

October 21, 2005

Barbara O. Schneeman, Ph.D.
Director, Office of Nutritional Products,
Labeling, and Supplements
CFSAN
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

Re: U.S. Government draft positions for the Codex Committee on Nutrition and
Foods for Special Dietary Uses [Docket No. 05-0006N]

Dear Dr. Schneeman:

The Consumer Healthcare Products Association (CHPA) appreciates the opportunity to provide comments concerning U.S. Government positions in preparation for the 27th session of the Codex Committee on Nutrition and Foods for Special Dietary Uses this November in Bonn. CHPA represents manufacturers of dietary supplements and nonprescription, or over-the-counter (OTC) medicines. CHPA, founded in 1881, is committed to promoting the increasingly vital role of OTC medicines and dietary supplements in the healthcare system through science, education, and advocacy.

As we stated at the October 18 public meeting on draft U.S. Government positions, CHPA encourages the U.S. Government to modestly amend its position within the “guidelines for the use of nutrition claims: draft table of conditions for nutrient contents (part B containing provisions on dietary fibre).” We encourage the U.S. to support a definition of dietary fiber with carbohydrate polymers with a degree of polymerization (DP) of not lower than 3. We agree that a clarification referring to a cutoff that excludes mono- and disaccharides would be appropriate if a DP of 3 were included in the definition (rather than a DP of 10, as previously supported by the U.S. Government, and as bracketed for further CCNFSDU discussion).

A number of studies have supported the benefits of non-digestible carbohydrates with a DP of 3 and greater – a DP which should be included within the fiber definition. (See, for example, “The effect of the daily intake of inulin on fasting lipid, insulin and glucose concentrations in middle-aged men and women,” Jackson, et al., 82 British Journal of Nutrition 23-30 (1999); “Addition of inulin to a moderately high-carbohydrate diet reduces hepatic lipogenesis and plasma triacylglycerol concentrations in human,”

page 2

Letexier, et al., 77 American Journal of Clinical Nutrition 559-64 (2003); and “A combination of prebiotic short- and long-chain inulin-type fructans enhances calcium absorption and bone mineralization in young adolescents,” 82 American Journal of Clinical Nutrition 471-6 (2005).)

We hope the U.S. Government will make this modest change in its position, and we thank you for the opportunity to provide our views.

Sincerely,



David C. Spangler
Vice President – International &
Assistant General Counsel

cc: Nancy Crane, FDA

ccnfsdu05/s