



October 4, 2017

**VIA ELECTRONIC SUBMISSION**

Division of Dockets Management  
Food and Drug Administration  
Department of Health and Human Services  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

**Re: Docket No. FDA-2017-P-2229-0001; American Bakers Association Citizen Petition**

The Council for Responsible Nutrition (CRN) respectfully submits these comments to the Food and Drug Administration (FDA) in response to the citizen petition submitted by the American Bakers Association (ABA) regarding the Agency's definition of dietary fiber, which was included in FDA's final rule on nutrition labeling. CRN is the leading trade association for the dietary supplement and functional food industry, representing manufacturers of dietary ingredients and of national brand name and private label dietary supplements.<sup>1</sup>

The actions requested in the ABA petition are as follows:

- A. ABA requests the Commissioner to promptly revoke the definition of dietary fiber in 21 C.F.R. 101.9(c)(6)(i) and revert to the chemical definition of dietary fiber.
- B. If the Commissioner does not revoke the definition of dietary fiber, ABA requests the Commissioner to adopt a less burdensome definition of dietary fiber, such as the definition adopted by Health Canada.
- C. If the Commissioner does not revoke or adopt a less burdensome definition of dietary fiber, ABA requests the Commissioner to fix the existing definition as detailed herein.
- D. ABA requests the Commissioner to immediately stay the definition of dietary fiber in the interim.

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<sup>1</sup> The Council for Responsible Nutrition (CRN), founded in 1973 and based in Washington, D.C., is the leading trade association representing dietary supplement and functional food manufacturers, marketers and ingredient suppliers. CRN companies produce a large portion of the functional food ingredients and dietary supplements marketed in the United States and globally. Our member companies manufacture popular national brands as well as the store brands marketed by major supermarkets, drug stores and discount chains. These products also include those marketed through natural food stores and mainstream direct selling companies. CRN represents more than 150 companies that manufacture dietary ingredients, dietary supplements and/or functional foods, or supply services to those suppliers and manufacturers. Our member companies are expected to comply with a host of federal and state regulations governing dietary supplements and food in the areas of manufacturing, marketing, quality control and safety. Our supplier and manufacturer member companies also agree to adhere to additional voluntary guidelines as well as to CRN's Code of Ethics. Learn more about us at [www.crnusa.org](http://www.crnusa.org).

We request that FDA address the issues raised in the ABA petition and in the comments that CRN and other organizations submitted on FDA's draft guidance regarding dietary fiber (FDA-2016-D-3401).

CRN further supports the comments already provided in response to the ABA petition that, until these concerns are addressed by FDA, the Agency should immediately stay the definition of dietary fiber in the interim.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrea Wong". The signature is fluid and cursive, with a large loop at the end.

Andrea Wong, Ph.D.

Vice President, Scientific & Regulatory Affairs