



Office of Policy and  
Program Development

Labeling and Program Delivery Division  
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1/10/2013

Robert Hibbert  
Morgan, Lewis & Bockius LLP  
1111 Pennsylvania Ave., NW  
Washington, DC 20004-2541

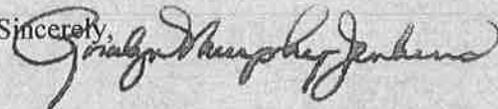
Dear Mr. Hibbert:

This letter is in response to your June 8, 2012 petition submitted on behalf of your client SunOpta, Inc. (SunOpta), regarding the naming of oat fiber. The petition requests that the Food Safety and Inspection Service (FSIS) determine that the proper nomenclature for an oat fiber ingredient is "oat fiber" when used as a binder in meat and poultry products.

As you know, FSIS has historically not permitted the use of the term "fiber" for the naming of ingredients. FSIS has recommended and approved a descriptive naming approach using the terms "isolated," "modified," and "product," e.g., "isolated oat product." Because the subject ingredient is under the jurisdiction of Food and Drug Administration (FDA), FSIS requested comment from FDA for the naming of "fiber" ingredients that contain varying amounts of fiber (e.g., a minimum of 85 percent). While the FDA has not established a definition for "fiber," we have received confirmation from FDA that it does not object to an ingredient declaration of "( )" fiber when the ingredient contains 85 percent or more dietary fiber based on an appropriate AOAC method of analysis. Furthermore, to accurately describe the basic nature of such ingredients, the source of the fiber, e.g., "oat" or "oat hull," should be included as part of the name.

As referenced in your petition, SunOpta's oat fiber ingredient contains 93 to 97 percent fiber. Therefore, FSIS does not object to labeling the subject ingredient as "oat fiber" in the ingredients statement of meat and poultry products in which it is used as a binder. FSIS will clarify this policy by amending the entry "Oat Hull Fiber" and "Oat Fiber" in FSIS Directive 7120.1 at its next posting.

If you have any questions or concerns, please contact Mr. Mark Reo at (301) 504-0878.

Sincerely,  


Rosalyn Murphy-Jenkins, Director  
Labeling and Program and Delivery Division

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