

**From:** [REDACTED] (SANTE)  
**Sent:** mercredi 6 octobre 2021 15:20  
**To:** [REDACTED] (SANTE)  
**Cc:** [REDACTED] (SANTE); [REDACTED] (SANTE); [REDACTED] (SANTE); [REDACTED] (SANTE); [REDACTED] (SANTE)  
**Subject:** BTO meeting JRS Food Ingredients 9 August / FW: Role of dietary fiber in EU strategies for improving nutrition

Dear [REDACTED],

Here the BTO from a meeting [REDACTED] and I had on 9 August, which was drafted mainly by [REDACTED] and which I had not yet circulated.

E2 was informed already about the issue mentioned falling under their competence.

[REDACTED], thanks for registering it.

Best

[REDACTED]

BTO

**Meeting with JRS Food Ingredients (virtual)**

**9 August 10:45 – 11:15**

**Subject:** Role of dietary fibre in EU strategies for improving nutrition

**Participants:**

JRS Food Ingredients: [REDACTED] ([REDACTED])

Sante.E1: [REDACTED], [REDACTED]

The meeting was organised on request of JRS Food Ingredients to discuss the role of dietary fibre in food reformulation and nutrition labelling.

JRS Food Ingredients shortly introduced the company, which, among others, produces fibre concentrates.

JRS Food Ingredients

- Particularly highlighted a product with a concentrate derived from wheat. This product is not derived from wheat bran, but from other parts of the wheat plant, which leads to another composition as compared to fibre from wheat bran/wholegrain wheat : the concentrate consists of 97% pure cellulose and hemicellulose and has the benefit of longer shelf life as compared to wheat bran fibre.
- Pointed to studies available that demonstrate that intake of this product increased insulin sensitivity and reduces the risk of developing diabetes. No health claim application has been filed for the wheat fibre concentrate but are working on it. This product can be used when reformulating products keeping the original sensory profile, e.g. in meat and dairy products, which would be technologically more difficult with wheat bran fibre. Here, e.g. fat could be replaced and the content of saturated fatty acids could be reduced.
- Enquired about the reason for not including fibre a) in the EU reformulation policy b) as a mandatory element in the nutrition declaration; asked if this would change in the context of Nutri-Score.

- Furthermore, they wanted to understand the background for exempting inulin from being considered as an additive when added to foods at levels below 3g/100g (inulin to be listed in that case as ingredient not additive), while no other derogations were granted for other fibre concentrates. Expressed the view that every dietary fibre concentrate should be on the food additives list of exceptions.

#### Sante

- Explained the EU reformulation initiatives within the frame of work coordinated by Directorate C, the EU frameworks on national initiatives on salt reduction and on selective nutrients, with annexes on saturated fat and added sugars. Health policy / nutrition policy remains mainly a competence of Member States, while the EU supports and coordinates such work.
- Explained that the list of nutrients that have to be declared in the nutrition declaration have been agreed by the legislators during the negotiations on Regulation (EU) No 1169/2011. Updated on the process of the revision of the Food Information Regulation, including the work on front-of-pack nutrition labelling.
- With regard to the question on additives, JRS Food Ingredients was referred to unit E2.

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**From:** <[REDACTED]@JRS.DE>  
**Sent:** Wednesday, July 7, 2021 2:04 PM  
**To:** JUELICHER Sabine (SANTE) <[REDACTED]@ec.europa.eu>  
**Subject:** Role of dietary fiber in EU strategies for improving nutrition

Dear Mrs. Juelicher,

I am writing to you, because I found your name in the organization chart and think that your unit is the most suitable contact address for my request.

*The J. Rettenmaier & Söhne company produces dietary fiber concentrates from plant-based raw materials like e.g. apple fiber or oat fiber. In addition, the company conducts intervention studies based on fiber and is involved in research projects such as the German interdisciplinary enable cluster [Food Reform - Enable Cluster 2.0 \(enable-cluster.de\)](#).*

Against this background, we deal intensively with the topics of food reformulation and nutrition labeling, which are also mentioned in the European Farm to Fork strategy. We are delighted to see that a lot is being done to improve the diet of the population. However, we see further potential with regard to dietary fiber. The importance of dietary fiber for human health is undisputed. Nevertheless, it is still not mandatorily included in the nutrition table and the potential offered by dietary fiber for food product improvement is still not given enough consideration in the reformulation strategy either.

I don't want to go into too much detail in this E-Mail, but I would like to get in contact with those responsible at the EU Commission to talk about the role of dietary fiber in the solutions that are being pursued to tackle non-communicable diseases.

If you are not the right contact person or if there are other official ways that enable to ask questions to the European Commission, I kindly asked you to refer me to the right contact person.

Thank you very much for your answer in advance,

Kind regards,



JRS Food Ingredients

J. RETTENMAIER & SÖHNE  
GRÜND. 1845



Fibers designed  
by Nature

Holzmühle 1  
73494 Rosenberg  
GERMANY

Tel: +49 (0) [redacted]  
Mobil: +49 (0) [redacted]  
E-Mail: [redacted]@irs.de  
Web: [www.irs.de](http://www.irs.de)



By the way, we want to stay in touch! Therefore we have stored your details. We attach great importance to the protection of your personal data and in our updated privacy statement we explain in a clear and comprehensible manner which information we store and for which purpose. You can find the latest version of our data protection rules online and always updated in our [Privacy Policy](#).