

IDF Europe comment on food labelling with respect to diabetes

Commission Proposal COM(2008) 40 for a Regulation on the provision of food information to consumers

There are an estimated 31.2 million people living with diabetes in the EU. This figure represents 8.62% of the total adult population of the EU27 and is expected to grow to 10.3% by 2025. The complications associated with diabetes can be extremely costly, both economically and socially. A key requirement to preventing these costly complications is maintaining good blood glucose (glycaemic) control. This in turn is highly dependent on knowing the carbohydrate content in food.

Diet is one of the cornerstones in diabetes care. Persons with diabetes can eat any foods recommended to the general population, as part of a balanced diet. With sufficient nutritional information, they can adequately manage their condition.

Clear and easily understandable food labelling is an essential part of enabling people with diabetes to make their everyday food choices. People with diabetes taking insulin or glucose-lowering tablets must match the timing and dosage of their medication to the quantity and nature of the carbohydrate contained in their meal to help maintain good or 'near normal' blood glucose (glycaemic) control. This is why carbohydrate information on the front of pack label is particularly important to good diabetes care.

Modern diabetes care – based on best practice for the prevention of complications – demands increasingly tight control of blood glucose levels for those with Type 1 or type 2 diabetes, and of course, for those with diabetes in pregnancy.

IDF Europe supports the Commission's proposal to make labelling mandatory for all pre-packaged food, and recommends its introduced to non pre-packaged foods, if possible.

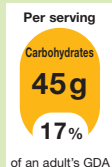
People with diabetes represent 31.2 million consumers who need clear and easily understandable information on the content and nutritional value of the food they buy.

Information on carbohydrates is particularly important for people living with diabetes.

FRONT OF PACK LABELLING

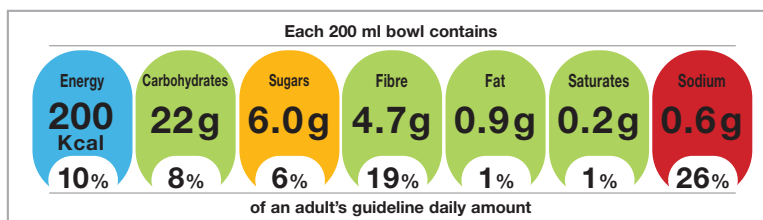
It is important for people with diabetes to have front of pack labelling which includes the amount of carbohydrates. IDF Europe supports the inclusion of the following information on the front of pack label in an easily readable format: energy, carbohydrate with specific reference to sugars, fat and of which saturated fats, fibre and sodium.

As consumers are often confused as to the difference between carbohydrates and sugars, it is essential to list both on the front of pack label.



PERSONS WITH DIABETES DO NOT REQUIRE SPECIAL FOODS, HOWEVER THEY MUST KEEP TRACK OF WHAT THEY EAT, SPECIFICALLY CARBOHYDRATES

For persons with diabetes, an important part of keeping blood sugar levels on track is through monitoring what one eats, more precisely the intake of carbohydrates. An insulin treated person needs to be able to evaluate the amount of carbohydrates consumed to be able to decide the dosage of insulin needs for each meal. By knowing how many carbohydrates are eaten, they are able to adjust their medication to improve blood sugar levels. This is why accurate and easily understandable food labelling is critical for persons with diabetes.



SIGNPOSTING OR 'TRAFFIC LIGHTS'

While IDF Europe supports the signposting of food to enable customers to most easily understand nutrient information, it is not enough for persons with diabetes who need to know the exact carbohydrate content of food. Signposting could be used to facilitate easier choices when balancing body weight, which is particularly relevant to persons with Type 2 diabetes. If GDA labelling remains in the proposal, IDF Europe calls for it to be considered a minimum standard whereby Member States can choose to go further and implement a traffic light system of labelling.

BACK OF PACK LABELLING

The back of pack label should specifically include the amount of carbohydrates per 100g or per 100 ml, and per portion. Both are necessary so that products may be compared easily and to better understand what is meant by a 'portion'. The number of portions per pack should also be stated.

As maintaining a balanced diet is recommended for all people, IDF supports the inclusion of the following nutrients on the back of pack label so one can make informed dietary choices:

- **Energy value**
- **Following nutrients**
 - protein
 - carbohydrate
 - fat
 - of which saturated fat
 - fibre
 - sodium

Nutrition Information	Per 100 ml	Per serving (1 bowl, 300 ml)
Energy	56 kcal 240 kJ	168 kcal 720 kJ
Protein	4.5 g	13.5 g
Carbohydrate of which sugars	8.8 g 1.2 g	26.4 g 3.6 g
Fat of which saturates	0.4 g 0.1 g	1.2 g 0.3 g
Fibre	1.9 g	4.7 g
Sodium	0.1 g	0.3 g

As people are often unclear as to the difference between carbohydrates and sugars, IDF Europe supports that the nutrition declaration is expressed as follows (Annex XIII, Part B, 1):


- carbohydrate
- of which
 - sugars
 - polyols
 - starch

When fighting against the epidemic of Type 2 diabetes, including the amount of fat, and specifically saturated fat, is particularly important. Also transfats are useful to declare.

IDF Europe supports the current rule that 15% of the recommended allowance of vitamins and minerals constitutes a significant amount. (Annex XI, Part A, 2)

ALCOHOLIC BEVERAGES

IDF Europe is disappointed that wine, beer and spirits are excluded from this proposal (Article 20(e)). All alcoholic beverages should be labelled to enable consumers and persons with diabetes to calculate the content of alcohol and carbohydrates, in addition to the energy value.

Alcohol Facts	
 Contains 5 Servings	Calories per 100 ml: 98 Alcohol per serving: 0.5 g Carbohydrates per serving: 13 g
Serving Size: 100 ml	

IDF Europe is also disappointed that where alcoholic beverages are labelled, the proposal calls for alcoholic strength to be indicated by vol %. This information should be consistent with other labelling and therefore expressed as g/100 ml. Carbohydrates should be expressed in g/100 ml. (Article 9, 20(e) 27, 40 and Annex X)

Concerning Council Directive 89/398/EEC on the approximation of the laws of the Member States relating to foodstuffs intended for particular nutritional uses (PARNUTS)

The rules on food labelling should also prohibit the use of misleading information.

The original PARNUTS Directive called for a report on 'Foods for persons suffering from carbohydrate-metabolism disorders (Diabetes)' which is set to reach the Parliament in April 2008. The report will examine the issue of allowing food manufacturers to use the claim that certain foods are 'suitable for diabetics'.

There is a consensus amongst scientific and medical experts that persons with diabetes do not need 'special foods'. There is no scientific evidence which would support the use of the claim 'suitable for diabetics' on foods aimed at people with diabetes. There is universal consensus across the entire European diabetes community that there must be an end to all product marketing which erroneously implies that there are foods particularly suited to people with diabetes.

IDF Europe would like to see foods labelled as 'suitable for diabetics' excluded from the scope of the PARNUTS Directive.