



International Diabetes Federation
European Region

IDF Europe
International Diabetes Federation

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IDF Europe position on “diabetic food”

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Subject: Council Directive 89/398/EEC on the approximation of the laws of the Member States relating to foodstuffs intended for particular nutritional uses
Foods for persons suffering from carbohydrate-metabolism disorders (Diabetes)

IDF Europe would like to provide its comments on the proposed legislative options:

- Option A** adopt a Commission Directive laying down specific compositional criteria for these products:
Option B amend Directive 89/398/EEC to delete these products from Annex 1, but allow marketing of such products under the provisions of Article 9 of the Directive;
Option C amend Directive 89/398/EEC so that foods labeled as ‘suitable for diabetics’ are excluded from the scope of that Directive.

IDF Europe supports Option C

There is a consensus amongst scientific and medical experts that persons with diabetes do not need ‘special foods’. Persons with diabetes can eat any foods recommended to the general population, as part of a balanced diet. With sufficient guidance they can adequately manage their condition. There is no scientific evidence which would support the use of the claim ‘suitable for diabetics’ on foods aimed at people with diabetes. In our view, there is universal agreement among the entire European diabetes community that an end to all marketing of products as particularly suited to people with diabetes would be a good thing. Naturally some foods are more appropriate than others, but so are they for the general population.

We note that DSNB is an international scientific expert group which has concentrated on developing guidelines for nutrition for people with diabetes. Their guidelines are the basis of National guidelines in most EU member states (www.dnsg.org).

Option B is not supported by scientific evidence. This proposal does not take into account all issues needed. Foods for persons with diabetes should not be considered to be Article 9 products, because there is no scientific justification for the particular nutritional need. There would be no specific nutritional criteria for foodstuffs labeled ‘suitable for diabetics’ which the member states could use to evaluate whether the label should be accepted or rejected.

Foods that are currently labeled ‘diabetic’ are no healthier or more suitable for people with diabetes than other foods. Such labeling is misleading for persons with diabetes:

- Some people mistakenly believe that food with a ‘diabetic’ labeling is beneficial and they can eat those products freely, which in most cases is harmful. Some of these foods contain high levels of saturated fats, not recommended for people with diabetes (or others). Others contain artificial sweeteners which themselves may have adverse effects.
- Currently ‘diabetic’ labeling tends to be used on chocolates, jams, sweets, biscuits and similar foods. Labeling these types of foods as ‘diabetic’ undermines important messages about healthy eating, and as we have mentioned all of these are permitted in moderation for people with type 1 and type 2 diabetes who are receiving regular healthcare.
- ‘Diabetic’ foods are usually more expensive than other products.



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There is no single food that people with diabetes cannot eat and they do not have to cut out sugar totally. But, like everyone, people with diabetes should try to eat only small amounts of foods that are high in sugar or fat (especially saturated fat), or both. When choosing suitable foods diabetics can already utilize the information of foods labeled with claims such as 'low-sugar', 'low-fat' which are regulated by the Nutrition and Health Claims Regulation. The new regulation gives more reliable information.

Carbohydrate quantities, sources and distribution throughout the day should be selected to facilitate near-normal long-term glycaemic control (HbA1c-levels). Modern diabetes care 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. For those treated with insulin or glucose-lowering tablets, the timing and dosage of the medication has to match the quantity and nature of the carbohydrate contained in the meal. In order to facilitate this, it is imperative that general labeling of all foodstuffs available in the EU becomes obligatory and contains detailed information of ingredients of food including carbohydrate content in an accessible and readily understandable format.

We strongly recommend that you appraise yourselves of current nutritional guidelines relating to diabetes from the DSNG website. If you wish to discuss this submission further, please do not hesitate to contact us.

With kind regards

Tony O'Sullivan
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Der Präsident

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Council Directive 89/398/EEC
on the approximation of the laws of the Member States
relating to foodstuffs intended for particular nutritional uses
Foods for persons suffering from carbohydrate-metabolism disorders (Diabetes)

The German Diabetes Society (Deutsche Diabetes Gesellschaft, DDG)

fully agrees

to the IDF Europe statement (enclosed)
and supports the legislative Option C

(amend Directive 89/398/EEC so that foods labeled as
,suitable for diabetics' are excluded from the scope of that Directive)

Prof. Dr. med. Thomas Haak

The President of the German Diabetes Society

Diabetes erforschen und verhindern, behandeln und heilen.

Deutsche Diabetes-Gesellschaft

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