

Food Labeling

AMERICAN DIABETES ASSOCIATION

The important role that nutrition plays in maintaining and improving the nation's health has been well documented. In particular, self-management training in the area of nutrition is an essential component of the treatment of diabetes.

To make appropriate food choices and to select appropriate portion sizes, consumers must have information available to them that is truthful, meaningful, understandable, and complete. This information also must not be misleading. Food labels that include nutrition and ingredient information are the most efficient and practical way to communicate much of these data.

With the passage of the Nutrition Labeling and Education Act (NLEA) of 1990 (PL 101-535) and the subsequent implementation of the Food and Drug Administration (FDA) and the United States Department of Agriculture Food Safety and Inspection Service (FSIS) regulations, food labels are required to be uniform and truthful. The food label format

- includes a uniform list of nutrients for all products
- establishes new label reference values (*daily values*) for nutrients and food components
- defines standard serving sizes for about 140 food product categories
- defines descriptive label words and phrases (for example, *light*)
- defines health claims which can be made to describe the relationship be-

tween a food or food component and a disease or health-related condition

- requires a more informative ingredient listing

The FDA has also implemented similar nutrition labeling regulations for dietary supplements (vitamins, minerals, herbs, and other similar supplements).

The American Diabetes Association wholeheartedly supports the food and dietary supplements labeling regulations of 1993 and commends the FDA and the FSIS for their efforts.

SPECIFIC RECOMMENDATIONS

1. The nutritional meaning of an individual food should be considered only in the context of overall food consumption and health status. Food labels are necessary for this interpretation.
 - a) For healthy individuals, including those who have diabetes, no food or group of foods should be prohibited in the day's total food choices; however, certain foods should be eaten in moderation. For example, to meet the nutritional goal of having <10% of daily calories from saturated fat, foods high in saturated fat should be eaten in moderation.
 - b) For persons with diabetes, there is no scientific evidence to unnecessarily restrict sucrose and

other sugars; however, foods containing high proportions of added sugars should be used sparingly in the context of a healthful diet. If used, these foods should not be added to the meal plan but instead should be substituted for other carbohydrate in the meal plan.

- c) Food manufacturers are encouraged *not* to promote, advertise, and/or target a particular food or group of foods specifically to people with diabetes based on nutrient, ingredient, and/or health reasons.
- d) The present 21 CFR 105.67(a) label statement, "Diabetics: this product may be useful in your diet on the advice of a physician. This food is not a reduced calorie food," is not compatible with the above statements and should be deleted from federal regulations.

2. Food labels cannot compensate for inadequate nutrition knowledge. To use the information provided by food labels appropriately, consumers must be educated about and must be able to apply basic principles of good nutrition. This is particularly true for people with diabetes who must be knowledgeable about foods in relation to their diabetes self-management. This learning process is enhanced and facilitated by the guidance of the registered dietitian as well as other diabetes educators.
3. Although the vast majority of foods are required to have labeling, there are exceptions: foods manufactured by small businesses and foods prepared and sold in restaurants, in food stores, and by food service vendors. Because the primary purpose of labeling is to present truthful and uniform information, food retailers who are exempt from labeling are *encouraged* to provide consumers with scientifically sound and objective information that will assist in making appropriate

Originally approved June 1990.

Revised March 1994.

NLEA, Nutrition Labeling and Education Act; FDA, Food and Drug Administration; FSIS, Food Safety and Inspection Service; CFR, Code of Federal Regulations.

food choices. Companies or corporations exempt from labeling requirements who market food products to people with diabetes are *strongly encouraged* to include all food labeling information on their products.

4. The use of the American Diabetes Association name and/or logo in conjunction with a fund-raising message

from a food manufacturer, exchange information, and/or the diabetes quiz is acceptable on a food label if authorization is provided by the Association (*acceptable* is defined as acceptable under American Diabetes Association established policy and not prohibited under FDA regulations for health claims). This infor-

mation (e.g., name, logo, fund-raising message) should not be interpreted as either overt or implied endorsement by the American Diabetes Association of a specific food, as all foods (albeit some at moderate to low levels) may be incorporated into a meal plan for a person with diabetes.