

Estimated Implications of PDGN

Estimations by R Hakeem

Background

With due respect to the team involved and without any intent to make anyone responsible, I am sharing these observations because of my perception that it is in the best interest of masses and future of nutrition in Pakistan. It is very painful to state this but, I have to say that in view of my estimates its harmfulness (narrated below) I strongly feel that public be informed about the errors in the document and current version removed from FAO website.

I have already submitted my observation and request to the authors but haven't got any response. I am trying other channels also to prevent the public harm and unanimity of fellow nutritionists specially who served as experts for this document can speed up the process.

A copy of the observations I sent to authors is attached that include complete page wise list of areas of concerns. You can share your comments in Q no 10 of the survey, by quoting the serial number of the concern. I am also enclosing a copy of PDGN with line numbers and areas of concern underlined.

PDGN 2018 and Public Nutrition in Pakistan

PDGN 2018 if trusted and followed by public and professionals would lead to the following:

1. Increased energy density and decreased nutrient density of diets because of the following:

- a. Wrong information is given about food sources of nutrients and energy and nutritive value of foods. Energy values are in general underestimated and vitamin and mineral value over estimated at most places in the document including gross misrepresentation of scientific facts e.g. mentioning apples as rich in Iron and milk as rich in vitamin C.
- b. PDGN promoting a lower consumption of non-starchy vegetables by merging potatoes with vegetables without specifying number of serving from non-starchy vegetables, giving an unusual classification of vegetables where peas beans etc. are categorized as leafy vegetables

2. Lead to increase in obesity and chronic diseases because of the following:

- a. Promotes the use of total fats, saturated fats and trans-fats
 - i. As compared to FBDG 2005 a lower amount of cereals and vegetables is suggested, consequently a larger proportion of energy is provided by milk meat and fats. The suggested diets provide around 40% calories from fats.
 - ii. Consumption of saturated fats is promoted by removing the dietary message that guided about limiting the use of solid fats, consumption of ghee is promoted by adding it on the title picture, giving a misconception that only red palm oil has saturated fats.
 - iii. Consumption of trans-fats is promoted by adding it on the title picture, and instead of highlight its harms by highlight in avoidance of Vanaspati ghee, reader is given a wrong concept that trans-fats are produced by frying the foods.
- b. Promotes underestimation of obesity by suggesting a higher cut-off values

- c. Undermines the high risk of diabetes by giving a lower prevalence

Lead to Poor maternal nutrition

- a. PDGNs are likely to promote poor maternal nutrition as mother's nutritional status is not where found to be focused because of its impact on her own health. Maternal nutrition is mentioned as a tool to give birth to healthy babies and provider of milk. For example breast feeding is suggested for an indefinite period without considering its impact on maternal nutrition.
- b. Amount of food suggested for pregnant and lactating women are not sufficient to fulfil the upper end of the requirements

Lead to Poor child nutrition:

- a. In Pakistan stunting is a major issue and stunted not only have higher risk of obesity but even at a relatively lower fat percentage pose higher health risks to them as compared to non-stunted children. Instead of focusing on the need for nutrient dense foods for catch up growth, in PDGN stunting is defined as chronic energy deficiency. It gives a message that by consuming energy dense food child will grow taller.
- b. Amount of food suggested for various ages are not sufficient to fulfil the upper end of the requirements
- c. Recommendations for complimentary feeding are too confusing to be followed e.g. it excels all beverages.

PDGN 2018 and Public Nutrition in Developing Countries world wide

Because of the number and type of technical mistakes, PDGNs are going to have a negative impact on nutrition worldwide by shattering the credibility of Nutritionists but that of FAO publications and projects.

As FAO publications are an affordable source of information for professional in developing countries, diminishing of trust on FAO publications would be a great loss. Presence of mistakes in the document, lack of realization of its impact and complete disregard for preventing public harm are situations that gives a very alarming reflection on the state of affairs within the official sectors concerned.

Annexure 1

COMMENTS ON PDGN 2018 submitted to Authors

BY RUBINA HAKEEM

FBDG could play an important role in determining the nutrition situation of people. Concern about recently launched FBDGs for Pakistan title as PDGN has already been raised. In order to contribute to the process of revising the document observations and view are being shared here. A section wise narrative summary of the observations based on specific observations is given along with page-wise list of observations.

Executive Summary of the Observations

REVIEW OF THE NUTRITION SITUATION in PDGN

FBDGs are designed and revised to provide updated evidence based dietary guidelines to prevent and control nutrition related issues. The quality of review of scientific evidence is a core determinant of the usefulness of the guidelines. In many developing countries availability of country specific scientific evidence is a challenge that needs to be met by making intelligent use of local and locally applicable international data. In PDGN, it could not be ascertained after reading the two section that what new evidence has emerged in relation to the nutrition situation in Pakistan since 2005, and how has it provided rationale for modifying the guidelines. It would have been useful if the scope/procedure/criteria of review and issues if any faced by the authors were given in the document. The variations in writing styles and standard of cited references are too vast to determine the purpose and target beneficiaries for this review. Even where primary or secondary data could have been cited, other professionals' slides, blogs and commercial sites have been used. Even where available evidence form local studies is not included. At a few places the Interpretations of data is unexpected. Unfortunately the hard work loses its purpose due to the confines mentioned above. A comprehensive list of concerns is given in the list of observations.

METHODS:

This section could have been more useful if it gave information about the following:

1. What kind of evidence was considered strong enough to modify the previous guidelines?
2. What the evidence was behind: (1) the modifications made in the messages, (2) modifications made in amount and type of food suggested for each age group, (3) modifications made in age groups
3. Which RDA was used for determining the amount and type of food suggested?
4. Which FCTs were used for assessing the nutritive value of suggested diets? Many of the nutritive values/characteristics given do not match any of the FCTs available on FAO website.
5. Were the guidelines pretested by the target users of the guidelines? e.g. could the PDGN be used as standalone document or what other resources a professional or

person would need for adopting the suggested diet e.g. how would they know about foods having similar nutritive value?

6. Nutritionists usually do not label any food as inherently good or bad and follow total diet approach which proposes that it is frequency and amount of various foods in the total diet that determines the quality of diet. Even when foods are to be categorized on the basis of any nutritional quality e.g. "nutrient density" or "energy density" any specific criteria is used. It is not been mentioned in the methods that what is the rationale is used for labeling foods as nutrient-dense, energy dense or rich source of any particular nutrient? In various sections of the document foods rich in protein and a number of micronutrients are labeled as junk/energy-dense foods. Furthermore same foods are listed as healthy in other section (e.g. Shami kabab).

PDGN

Food groups

1. As this heading is given under PDGN it could be assumed that the purpose of giving details of food groups is to educate the public about various food groups. But reading the text this assumption cannot be sustained as we find rampant use of several nutrition and health related technical terms that are not never heard by an average Pakistani
2. Overall the information given is inconsistent and includes a number of unusual, potentially misleading concepts (e.g. description of leafy and non-leafy vegetables, mentioning only red-palm oil instead of palm oil as being high in SFA) and stark inaccuracies (stating stearic acid as omega-9, referring to frying as a process that may convert cis to trans fats)

Recommended Dietary Allowances

1. It gives reference to different RDAs without giving any reason for doing so.
2. Instead of using a consistent authentic source variety of laymen's references are cited.
3. Text has several very confusing statements, e.g.
 - ".....main staple providing over 50% of energy, protein, vitamins and mineral" how can cereals provide 50% of each nutrient mentioned here; or
 - "The AMDR from meat and pulses group in the form of total calories is 5-35% " AMDR is for macronutrients only and not for foods

My Plate

Infographics used with FBDG are usually sketches (as given on the title page outer circle). Here inside the documents photographs are used. The main pic is a bit cluttered and not at all representative of the eating style of most Pakistanis. It would have been more acceptable and useful if a separate bowl was shown for curry. The infographic on the title page raise a few questions. In Pakistan most people associate the term ghee with "Vanaspatti-ghee" i.e. "hydrogenated oils" that is the richest source of Trans fats. Use of this term on the title of the guidelines gives a message that Ghee is not harmful. It could be taken as a license to use V-Ghee. As throughout the document this food group is labelled Fats and oils, use of the term ghee creates doubts about the intentions of the persons/s who did this. It would

support consumption of Ghee and contribute the elevation of health problems related to consumption of the Trans fats.

Amounts Of Food Suggested

The use of terms portion and servings is unusual.

As compared to previous guidelines a lesser amount of fruit, vegetable and cereals is suggested that translates into higher proportion of calories from fats even without adding any visible fats. No specific guidance is given about amount of fats that could be consumed daily. Amount suggested from other groups is insufficient to meet the energy requirements of all the person within the particular group. Thus if person having energy needs in the upper 10 percentiles follow the guidelines all the remaining calories are to be met by fats and sugars. Overall the suggested diet provides 36-40% of calories from fats even if a minimum amount is used in cooking. These dietary suggestions thus do not coincide with the dietary messages about fat consumption.

Reason for lowering suggested amount of fruit and vegetables is not understood. Keeping in mind that PDGN include potato in vegetable group, without specifying any specific amount from non-starchy vegetables nutrient density of suggested diet is expected to be lower than diet suggested in previous guidelines. Rationale for this strategy and underlying evidence if any needs to be given.

A few of the Food portions suggested are unusual e.g. 28 gram meat said to be 2-3 pieces of meat/fish.

Similar issues of miscalculations are seen in sample menus and recipes

Dietary messages

Messages about variety, type of preferred fat, 'fresh & home-made food, dark green leafy veg are omitted without giving any rationale for doing so.

Messages about body weight, whole grains, meat, pulses, whole grains, fortified foods, highly processed food are added. A much higher amount of milk is suggested for all

It is unclear, what is meant by "take extra care during pregnancy and lactation" and why breastfeeding for more than two years is suggested?

ANNEXURES

Reasons for adding several annexures that are not needed and are full of invalid information is not understood.

Conclusion & Request

While acceptance of errors and attempts to revise are appreciated and will be supported, the type and number of issues in the documents are doing more harm than good to the cause of nutrition not only in Pakistan but to all the beneficiaries of FAO documents by destroying trust on FAO documents, thus it needs to be taken back immediately.