

Canada's Food Guide Consultation

Diabetes Canada

Submission to Health Canada

August 1, 2017

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Healthy eating is a key pillar in the management of type 1 diabetes, type 2 diabetes, gestational diabetes and prediabetes. As part of an overall healthy lifestyle, it can help improve glycemic control for people living with diabetes and reduce the incidence of type 2 diabetes in those at high risk. Diabetes Canada applauds Health Canada for its commitment to improve the food environment through the development and implementation of a new Healthy Eating Strategy. People with diabetes and those at risk of developing diabetes have a large stake in the food environment in Canada. Diabetes Canada would like to thank Health Canada for the opportunity to provide feedback on the revision of the Food Guide as part of the Healthy Eating Strategy. Diabetes Canada's 2013 Clinical Practice Guidelines for the Prevention and Management of Diabetes in Canada underscore the importance of a healthy diet for people with diabetes and endorse Canada's Food Guide (the Food Guide, the Guide) as a useful document to help direct choices and intake.

Diabetes Canada recognizes that the Food Guide is a practical tool that translates the science of nutrition and health into a healthy eating pattern. However, it can also act as a framework for policy development. As part of this consultation, in addition to feedback on the proposed new Guide, Diabetes Canada feels it is important to provide complementary public policy recommendations to facilitate and enhance implementation of the Guide, and has done so throughout.

Guiding Principle 1: A variety of nutritious foods and beverages are the foundation for healthy eating.

Health Canada recommends:

- Regular intake of vegetables, fruit, whole grains and protein-rich foods*, especially plant-based sources of protein
- Inclusion of foods that contain mostly unsaturated fat, instead of foods that contain mostly saturated fat
- Regular intake of water

*Protein-rich foods include: legumes (such as beans), nuts and seeds, soy products (including fortified soy beverage), eggs, fish and other seafood, poultry, lean red meats (including game meats such as moose, deer and caribou), lower fat milk and yogurt, cheeses lower in sodium and fat. Nutritious foods that contain fat such as homogenized (3.25% M.F.) milk should not be restricted for young children.

What do you like/dislike about Guiding Principle #1?

Diabetes Canada supports the concepts presented in Guiding Principle #1.

The language of the accompanying recommendations in their current form is somewhat technical and assumes a high level of health literacy and nutrition knowledge on the part of the reader. Specifically, the terms “protein-rich”, “plant-based sources of protein”, “unsaturated fat” and “saturated fat” may not be accessible to the general public. Further explanation of the recommendations would help to facilitate comprehension and uptake.

Diabetes Canada proposes the following enhancements:

- the recommendations be worded in simple language and supported by pictorials
- the final document contain information expanding on the recommendations similar to what is currently in the section titled *What this means for Canadians*
- the supporting information to the recommendations provide definitions for some of the more technical terms and examples of foods to eat more often and foods to limit, that are affordable, accessible, culturally diverse and representative of the varied diets associated with different ethnic backgrounds

What do you like/dislike about Recommendation #1?

Diabetes Canada supports the emphasis on whole foods consumption in Recommendation #1.

The organization advocates a balanced, varied intake for those with, and at risk of, diabetes. Many types of vegetables, fruits and whole grains have a low glycemic index (GI) and a diet rich in low GI foods has been shown to improve glycemic control.¹

Vegetables, fruits and whole grains also tend to be good sources of dietary fibre. A higher intake of fibre is recommended for people with diabetes than the general population due to demonstrated health benefits, including a decrease in cardiovascular disease risk, which is higher among those living with diabetes and prediabetes.¹

Regular intake of vegetables, fruits, whole grains and plant-based sources of protein, including legumes, nuts, seeds and dairy products, is an important part of the Mediterranean diet. A Mediterranean-style dietary pattern can improve glycemic control and cardiovascular risk factors, including systolic blood pressure, total cholesterol (TC), HDL cholesterol (HDL-C), ratio of TC to HDL-C and triglycerides in type 2 diabetes, and appears to have benefits for primary prevention of cardiovascular disease in people with and without type 2 diabetes.^{1,2} A legume-rich diet, either alone or as part of a low-GI or high-fibre diet, can lower fasting blood glucose and/or hemoglobin A1C, in people with and without diabetes.¹ As well, studies suggest that various types of unsalted nuts, consumed daily in moderate amounts, can improve blood lipids and hemoglobin A1C in those with diabetes.¹

Diabetes Canada proposes the following enhancement:

- more information regarding the quantity and frequency of vegetable, fruit, whole grain and protein intake be provided to further qualify the term “regular”
- a differentiation between sources of dietary protein be made so it is clear to Canadians that plant-based sources in particular may have some added health benefit
- a specific mention of dairy products be made with distinction from other protein sources by referring to them as “lower-fat calcium-rich foods”

An optimal diet is one that helps people to attain and maintain a healthy body weight while ensuring an appropriate, regular intake of macronutrients and micronutrients to reach their health potential. For those living with diabetes, the ideal macronutrient distribution depends on macronutrient quality, goals of the dietary treatment regimen and a person’s preferences and lifestyle.¹ There is evidence to show that personalized nutrition therapy provided by a registered dietitian is associated with enhanced dietary adherence, specifically in type 2 diabetes populations. Diabetes Canada encourages those with diabetes to benefit from individualized treatment/counselling for implementation of Recommendation #1 to help with blood glucose management.

Diabetes Canada proposes the following enhancement:

- the inclusion of a statement that encourages Canadians with a complex health history/particular dietary needs (e.g. living with diabetes) to seek guidance from

a registered health professional to personalize Recommendation #1 in order to achieve the best possible health outcomes

For many Canadians, limited access to safe, affordable, culturally appropriate, nutritious food is a barrier to healthy eating. Diabetes is more prevalent in food-insecure homes and food insecurity can make diabetes more difficult to manage. In order for people living with diabetes and all Canadians to adopt Recommendation #1, they need to be able to regularly and easily procure good quality vegetables, fruit, whole grains and protein-rich foods in their communities. It is critical therefore that the Healthy Eating Strategy fit within a larger pan-Canadian food security strategy.

Diabetes Canada proposes:

- the development of a strong coordinated partnership between Health Canada and Agriculture and Agri-Food Canada to address food insecurity in its proposed *Food Policy for Canada*
- Health Canada work with other federal departments and provincial, territorial and municipal governments to reduce the burden of food insecurity on Canadian households and systems
- the federal government establish and support collaborations with non-governmental organizations and not-for-profits that will help reduce food insecurity

What do you like/dislike about Recommendation #2?

Diabetes Canada supports the recommendation to limit saturated fat intake (found in fatty cuts of meat, palm kernel oil and high fat dairy products, for example) and aim to consume dietary fats that are unsaturated (from such sources as canola and olive oils, nuts, seeds and fatty fish).

People living with diabetes are two to three times more predisposed to developing coronary artery disease than the general population; restricting saturated fat intake to less than seven per cent of total daily energy helps to mitigate this risk.¹ Diabetes Canada also endorses moderate consumption of unsaturated fat in those with diabetes, with a recommendation of up to 20 per cent of total calories from monounsaturated fat and up to 10 per cent of total calories from polyunsaturated fat.¹ Nutrient terminology is not part of most Canadians' common vocabulary and is often not well understood. Its use may make it challenging for Canadians to act on this particular recommendation.

Diabetes Canada proposes the following enhancement:

- Recommendation #2 be further contextualized in some supporting text and examples of sources of unsaturated and saturated fats from a variety of culturally-diverse, affordable, accessible foods be provided

Trans fats derived from industrial hydrogenation are harmful to health. Diabetes Canada recommends people living with diabetes minimize intake of foods high in commercial trans fats. Diabetes Canada is aware that, as part of its Healthy Eating Strategy, Health Canada is exploring the elimination of commercially produced trans fats from the Canadian food supply. However, in the absence of current legislation banning industrial trans fats, Canadians continue to require strong guidance on reducing their trans fats consumption.

Diabetes Canada proposes the following enhancement:

- a clear statement, as part of Recommendation #2, that Canadians should also endeavour to avoid consuming food sources of industrially prepared trans fats

What do you like/dislike about Recommendation #3?

Diabetes Canada supports Recommendation #3.

Water is a healthy hydration choice for all Canadians. In order to facilitate implementation of this recommendation, additional actions must occur across government. In many regions in Canada, access to free, safe, clean drinking water is not a reality. Far too many communities are affected by drinking water advisories, with First Nations communities being disproportionately impacted by issues of drinking water safety. When the availability of potable water is low or expensive or its quality is questionable, people may opt for less healthy hydration alternatives out of necessity. In order for Recommendation #3 to be a realistic choice for Canadians, they need to be able to access safe drinkable water on a daily basis.

Diabetes Canada proposes:

- the Government of Canada follow through on its commitment to end long-term drinking water advisories on public systems on reserves across the country by 2021
- the Government of Canada work with the provinces and municipalities to increase the availability of potable water in public spaces and homes across the country

Water is a life nutrient and plays an essential role in regulating various systems in the body. Though the recommended daily amount differs between people and depends on a variety of factors, Canadians need guidance on the quantity of water to consume.

They also require more information about the benefits of water to health, especially as they consider alternate options to sugary beverages.

Diabetes Canada proposes the following enhancement:

- further explanation be provided of what is meant by “regular” with respect to water intake
- additional details be given about the importance and healthfulness of water

Based on your experience working with older adults, children and youth, Indigenous populations, low-income people, newcomers, or people with low literacy, is there any further feedback that you would like to give us about Guiding Principle #1?

Older adults, Indigenous Peoples and certain ethnic groups are at greater risk of developing type 2 diabetes compared to the general Canadian population. Those living with diabetes and struggling with low income, low literacy and other challenges may find it more difficult to make healthy food choices and effectively manage their disease. Engagement of vulnerable populations throughout the Food Guide consultation process and in the implementation and evaluation phases is necessary to ensure meaningful representation from at risk groups.

Diabetes Canada proposes:

- regular and ongoing input from the above-listed populations at each phase of the consultation process and in the implementation and evaluation of federal food guidance in order to maximize benefits within these groups

Guiding Principle 2: Processed or prepared foods and beverages high in sodium, sugars or saturated fat undermine healthy eating.

Health Canada recommends:

- Limited intake of processed or prepared foods high in sodium, sugars or saturated fat
- Avoidance of processed or prepared beverages high in sugars*

* Processed or prepared beverages that can be high in sugars include: soft drinks, fruit-flavoured drinks, 100% fruit juice, flavoured waters with added sugars, energy drinks, sport drinks, and other sweetened hot or cold beverages, such as flavoured milks and flavoured plant-based beverages.

What do you like/dislike about Guiding Principle #2?

Diabetes Canada supports the concepts presented in Guiding Principle #2.

What do you like/dislike about Recommendation #1?

Diabetes Canada is in favour of Canadians reducing high intakes of sodium, sugar and saturated fat in their diet.

An eating pattern, like the DASH diet (Dietary Approaches to Stop Hypertension), that promotes vegetables, fruit, low-fat dairy products, whole grains, poultry, fish and nuts, is healthful. The DASH diet has been shown to decrease systolic and diastolic blood pressure, hemoglobin A1C, fasting blood glucose, weight, waist circumference, LDL cholesterol (LDL-C) and C-reactive protein, and increase HDL-C in those with type 2 diabetes compared to a control diet matched for moderate sodium intake.¹ Diabetes Canada recommends consuming less than 10 per cent of total daily energy from free sugar and endorses limiting saturated fat (as discussed above).¹ Canadians would benefit from more information about terms “limit” and “avoid” to help direct choices and intake.

Diabetes Canada proposes the following enhancement:

- include guidance on consumption frequency and/or amount in the recommendation and/or accompanying Food Guide resources to help contextualize the terms “limit” and “avoid”

Some processed items, like frozen and canned vegetables and fruit and canned sources of protein (e.g. legumes, fish, etc.), are more easily accessible and affordable for those struggling with food insecurity. These represent healthy choices if they are prepared with little to no added sugar, salt or fat. Canadians should be made aware that some processed foods can be appropriate options, depending on added ingredients.

Diabetes Canada proposes the following enhancement:

- a specification in Recommendation #1 that some processed foods, like frozen and canned vegetables and fruit and canned sources of protein, can appropriately be included in a healthy diet if they are packaged and prepared with little to no added sugar, salt or fat
- some further explanation to identify processed foods that are unhealthy and therefore to be avoided

Diabetes Canada supports the goal for Canadians to decrease their intake of highly processed foods, while adjusting the palate to less salty, fatty, sugary options. However, there is a concern that efforts to decrease the amount of sodium, sugar and saturated fat in products may have undesirable consequences. A reduction of sugar content, for example, may come at the cost of an increase in the use of intense non-nutritive sweeteners and other additives. Health Canada should make a significant effort to reduce the risk of unintended consequences that ultimately do not provide Canadians with a healthier food environment.

Diabetes Canada proposes:

- the government explore models that can mitigate the risk of unintended outcomes and incent companies to reduce sodium, sugar and saturated fat in their products over time without the addition of artificial ingredients

What do you like/dislike about Recommendation #2?

Diabetes Canada supports the recommendation that Canadians avoid processed or prepared beverages high in sugars.

Diabetes Canada advocates for a reduction in Canadians' consumption of sugary beverages. Studies show that, on average, these drinks contribute to 35 per cent of adults' daily sugar intake, which has been estimated at 110 grams per days (equivalent to 26 teaspoons of sugar).³ Over 25 per cent of children and youth age five to 19 say they consume sugary drinks every day.⁴ Excessive sugar consumption has been linked to higher rates of weight gain and, independently, increased risk of type 2 diabetes and gestational diabetes.³ Given that sugar is ubiquitous in the Canadian food supply and diet, additional efforts are needed to support the implementation of this recommendation.

Diabetes Canada proposes:

- the Government of Canada consider adopting a multi-faceted approach related to sugar-sweetened beverages, including launching an educational campaign to make Canadians aware of the health impacts of sugary drink consumption, applying a levy on sugar-sweetened beverages with revenues

generated going towards health promotion activities, legislating front-of-package labeling to help people make healthy choices, and restricting marketing of unhealthy food and beverages to children and youth

Based on your experience working with older adults, children and youth, Indigenous populations, low-income people, newcomers, or people with low literacy, is there any further feedback that you would like to give us about Guiding Principle #2?

Diabetes Canada supports the development of resources and/or tools to accompany the Food Guide that would help educators and health organizations effectively disseminate healthy eating messages. These tools should be written in easy-to-understand, culturally appropriate language.

Guiding Principle 3: Knowledge and skills are needed to navigate the complex food environment and support healthy eating.

Health Canada recommends:

- *Selecting nutritious foods when shopping or eating*
- *Planning and preparing healthy meals and snacks*
- *Sharing meals with family and friends whenever possible*

What do you like/dislike about Guiding Principle #3?

Diabetes Canada supports the concepts presented in Guiding Principle #3.

The recommendations contained in this Guiding Principle would benefit from additional information to ensure public comprehension.

Diabetes Canada proposes the following enhancement:

- further explanation of each recommendation with content similar to that contained in *What this means for Canadians*, including a definition of the term “nutritious”

The prevalence of overweight and obesity has increased dramatically in Canada among both children and adult populations in the recent past. It is so widespread in 2017 that it is being called an epidemic. As body weight increases, so too does the risk of developing various chronic conditions. Obesity is associated with incidence of type 2 diabetes, several types of cancer and major forms of cardiovascular disease, to name only a few.⁵ An estimated 80 to 90 per cent of people with type 2 diabetes are overweight or obese.¹ Research suggests that insulin sensitivity, glycemic control, hypertension and dyslipidemia improve in people with, and at risk of developing, type 2 diabetes when they are able to achieve a modest weight loss.¹

Canadians would benefit from Food Guide messaging that promotes a healthy body weight. When people feel comfortable navigating the complex food environment and confident making healthy choices, they are more easily able to achieve and maintain a healthy weight and manage their chronic disease. The increase in the number of meals consumed outside the home is one of the many factors contributing to overweight and obesity and deserves special attention.

Diabetes Canada proposes:

- the addition of recommendations as part of Guiding Principle #3 that encourage Canadians to work toward their best weight, including:
 - pay attention to hunger and fullness cues to avoid overeating
 - focus on reducing calories by improving daily eating patterns, watching portion sizes and eating balanced, nutritious meals⁶

- eat out less often; prepare and consume foods at home
- use menu labeling to help guide healthy choices when eating out

What do you like/dislike about Recommendation #1, #2 and #3?

Diabetes Canada supports these recommendations.

Encouraging Canadians to shop in places that offer a variety of healthy foods, including retail stores and markets and even from producers themselves is a necessary step to promoting a healthy eating pattern. Consumption of foods that are minimally processed should occur more often. Furthermore, Canadians must develop and use food skills to plan and prepare meals that they can enjoy with one another. Through the creation of healthy eating environments, a healthy eating pattern can be promoted.

Based on your experience working with older adults, children and youth, Indigenous populations, low-income people, newcomers, or people with low literacy, is there any further feedback that you would like to give us about Guiding Principle #3?

Diabetes Canada's feedback and suggestions for strengthening Guiding Principle #1 and #2 and the Food Guide overall can also be applied to Guiding Principle #3.

Considerations:

- *Determinants of health*
- *Cultural diversity*
- *Environment*

What do you like/dislike about the considerations?

Diabetes Canada is in agreement with these.

The considerations are key factors that influence healthy eating. The importance of each consideration could be emphasized by integrating all of them into each of the Guiding Principles, rather than having them as stand-alone ideas.

Diabetes Canada proposes the following enhancement:

- incorporate the considerations into the Guiding Principles by addressing the impact and implications that the determinants of health, cultural diversity and the environment have on each recommendation

Revising Canada's Food Guide is one component in a suite of initiatives that form the Healthy Eating Strategy. There is great value to having consistent messaging between the various prongs of throughout the Strategy. Ideally, restrictions in marketing to children should complement the content of the revised Food Guide. Creating a marketing environment that is supportive of Food Guide principles will help change behaviours. Similarly, the content of the new Food Guide should align with the proposed front-of-package labeling system.

Diabetes Canada proposes:

- the Government of Canada prioritize the integration of all coinciding policy windows contained within the Healthy Eating Strategy and maximize cohesion between them

Diabetes Canada is a national health charity representing 11 million Canadians living with diabetes or prediabetes. The organization leads the fight to end diabetes by helping those affected live healthy lives, preventing the onset and consequences of the disease, and working to discover a cure. It has a heritage of excellence, innovation and leadership. It is supported in its efforts by a community-based network of volunteers, employees, health care professionals, researchers and partners. By providing education and services, advocating on behalf of people with diabetes, supporting research and translating it into practical applications, the organization is delivering on its mission.

Diabetes Canada is pleased to submit feedback to Health Canada in this consultation phase. Healthy eating is crucial in the prevention and management of diabetes. The organization is supportive of Health Canada's efforts to improve eating habits, promote health and decrease disease risk. Diabetes Canada will continue to be an active participant in future consultations regarding the Healthy Eating Strategy and will encourage its membership to do the same.

Thank you for the opportunity to provide input.

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