

August 12, 2020

The Honorable Sanford Bishop Jr., Chair
House Appropriations Subcommittee on
Agriculture, Rural Development, Food and Drug
Administration, and Related Agencies
2407 Rayburn House Office Building
Washington, DC 20515

The Honorable Jeff Fortenberry, Ranking Member
House Appropriations Subcommittee on
Agriculture, Rural Development, Food and Drug
Administration, and Related Agencies 1514
Longworth House Office
Washington, DC 20515

Dear Chairman Bishop and Ranking Member Fortenberry,

We are a group of established U.S. and international nutrition scientists, including three former members of different Dietary Guidelines Advisory Committees, who recently authored a “State of the Art Review” on saturated fats that was published in the *Journal of the American College of Cardiology*.¹ In this paper, we examined the health effects of saturated fats, and based on our findings, we respectfully request that Congress encourage the U.S. Departments of Agriculture (USDA) and Health and Human Services (HHS) give serious and immediate consideration to lifting the limits placed on saturated fat intake for the upcoming 2020 Dietary Guidelines for Americans (DGA). This request is based on a review of the most rigorous scientific data available.

We have a deep commitment to ensuring that population-wide nutrition recommendations are based on rigorous science. Concurrently, we share the concern that making recommendations based on anything but the most rigorous science available is likely to have unintended or even potentially harmful consequences to health.

During the course of the workshop, we discussed the latest scientific understanding of saturated fatty acids and their potential connection to heart disease and stroke. Broadly speaking, we concluded that the best and most updated science fails to support current limits on consuming these fats. Our findings and thinking are summarized below.

Since the launch of the DGA in 1980, Americans have been advised to consume a diet “low in saturated fats.” In 2005, the DGA added a specific limit of 10 percent of calories from these fats, and this recommendation has endured since that time. The current 2020-2025 Dietary Guidelines Advisory Committee, in its recently released scientific report, recommends continuing a 10 percent limit on saturated fats, for both adults and children.² The conclusion of our paper is that this cap is not supported by the current or most rigorous evidence.

A critically important consideration is the growing recognition by scientists in the field that the effect of saturated fats on health cannot be considered in isolation but instead must be analyzed as part of the

¹ Astrup A, Magkos F, Bier DM, Brenna JT, de Oliveira Otto MC, Hill JO, King JC, Mente A, Ordovas JM, Volek JS, Yusuf S, Krauss RM, Saturated Fats and Health: A Reassessment and Proposal for Food-based Recommendations: JACC State-of -the-Art Review, *Journal of the American College of Cardiology* (2020), doi: <https://doi.org/10.1016/j.jacc.2020.05.077>.

² Dietary Guidelines Advisory Committee. 2020. *Scientific Report of the 2020 Dietary Guidelines Advisory Committee: Advisory Report to the Secretary of Agriculture and the Secretary of Health and Human Services*. U.S. Department of Agriculture, Agricultural Research Service, Washington, DC., Part D, Chapter 9, p. 36.

larger food matrix (i.e., the composition of specific foods) in which these fats exist. It is now known that the impact of nutrients on health needs to be considered in the context of the overall diet (i.e., the other nutrients and foods people consume), the type and degree of food processing that a food undergoes, and other crucial factors such as a person's metabolic health and propensity for disease.

As we write in the paper, "Whole-fat dairy, unprocessed meat, eggs and dark chocolate are SFA-rich foods with a complex matrix that are not associated with increased risk of CVD. The totality of available evidence does not support further limiting the intake of such foods."

Our paper also concludes the following:

- Numerous meta-analyses of both controlled randomized trials and observational studies over the past decade have found no significant evidence for effects of saturated fat consumption on cardiovascular or total mortality. Furthermore, there is evidence that saturated-fat intake may be associated with a lower risk of experiencing a stroke.
- Recommendations to lower saturated fat consumption have been based primarily on the evidence that this will lower LDL, the type of cholesterol in the blood that has been linked to heart disease risk. However, it is now known that there is more than one type of LDL, and that in the majority of individuals, reducing dietary saturated fat does **not** lower the type (small dense LDL) that is most strongly associated with heart disease risk. This may help to explain why lowering saturated fat intake in trials has not been found to reduce cardiovascular mortality.
- The health effect of these fats varies significantly depending on the specific type of saturated fatty acid as well as the specific food source in which it is found. Evidence indicates that it is important to consider the food matrix when evaluating the impact of fatty acids on cardiovascular risk. For example, some foods, such as dark chocolate, whole-fat dairy, and unprocessed meat, have a relatively high saturated-fat content but show no association with increased cardiovascular risk.

We conclude that there is no strong scientific evidence that the current population-wide upper limits on commonly consumed saturated fats in the U.S. will prevent cardiovascular disease or reduce mortality. A continued limit on these fats is therefore not justified.

We seek to communicate this critical information to other scientists and governing bodies so as to enhance the evidence base for upcoming policy recommendations and research. Undoubtedly, Americans deserve a recommendation for dietary saturated fat that is based on the most current and rigorous science available. We hope that Congress can encourage the 2020-2025 Dietary Guidelines process, in whatever way possible, to critically review the most up-to-date evidence on saturated fats and modify this policy position on these fats accordingly.

Sincerely,



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cc: U.S. House Appropriations Subcommittee on Agriculture, Rural Development, Food and Drug Administration, and Related Agencies

U.S. Senate Appropriations Subcommittee on Agriculture, Rural Development, Food and Drug Administration, and Related Agencies