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**Oral Presentation on the USDA Food Guidance System/
Food Guide Pyramid
Public Hearing**

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I want to take this opportunity to thank the USDA and its Center for Nutrition Policy and Promotion for conducting this very important public hearing on the Food Pyramid. I am Bill Sanda, Director of Public Affairs for Weston A. Price Foundation.

The Foundation is a non-profit 501(c)(3) food and nutrition education organization founded in 1999 dedicated to restoring nutrient-dense foods to our diet through education, research and activism. We support a number of movements that contribute to this objective including accurate nutrition education, organic and biodynamic farming, pasture feeding of livestock, community-supported farms, honest and informative labeling, prepared parenting and nurturing therapies. The board, membership and 225 local chapters of the Weston A. Price Foundation stand united in the belief that modern technology should be harnessed as a servant to the wise and nurturing traditions of our ancestors and that science and knowledge can validate those traditions. The Foundation's quarterly journal, *Wise Traditions in Food, Farming, and the Healing Arts*, is dedicated to exploring the scientific validation of dietary, agricultural and medical traditions throughout the world. The Foundation invites you to visit its informative and educational website at www.westonaprice.org.

Before I comment on the food pyramid design and present our recommendations, I want to make two points about nutrition and food:

A 1971 USDA study on nutrition titled, "An Evaluation of Research in the United States on Human Nutrition" ¹ reported:

- Major health issues are diet related;
- The solution to illness can be found in nutrition
- The real potential from improved diet is preventative in that it may defer or modify the development of a disease state

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- Better health, a longer lifespan and greater satisfaction from work, family and leisure time are some of the benefits from improved nutrition

Interestingly, this study was never released to the public by the Nixon Administration, yet the findings are most critical to our welfare.

In addition, many now believe that we have more altered our food supply in the past 50 years than we have in the last 10,000 years when humans started to shift from hunters/gathers to farming.

Given these findings as well as many others, nutrition, food and our diets obviously play a most significant role in our health and well-being.

In our opinion, an effective approach to healthy nutrition is to go back to the four basic food groups and the eating practices recommended 60-70 years ago in books on nutrition and dietetics written before the introduction of imitation foods in the 1950s.

The Weston A. Price Foundation makes the following recommendations:

First and foremost, abandon the current Food Pyramid concept and return the proposed Food Guidance/Dietary Guidelines to a plan that stresses high quality foods from four basic groups.

Everyday, eat high quality, unprocessed foods from each of the following four groups:

- 1. Animal foods: meat, poultry, fish, eggs and whole milk products***
- 2. Grains and legumes: whole grain baked goods, breakfast porridges, beans***
- 3. Fruits and Vegetables: preferably fresh or frozen***
- 4. Fats and Oils: unprocessed saturated and monounsaturated fats including butter and other animal fats, palm oil and coconut oil, olive oil and peanut oil - an average of 35-40 percent of energy from food intake should come from beneficial fats and oils.***

Eat sparingly: sweets, white flour products, soft drinks and fried foods. Urge avoidance of processed foods containing refined and partially hydrogenated vegetable oils, highly sugared foods, especially those foods containing high fructose corn syrup as well as refined, highly processed protein isolates. Limit added sugars to no more than 10 percent of daily caloric intake.

I am aware of the fact that this statement contradicts the information given to both the health profession and the public since the development of the U.S. Dietary Guidelines in the 1970s. Our experience is that the current Food Pyramid does not give anyone

trying to use it any clear indication of the amounts of natural food products that would be appropriate versus the processed food products that would be selected. Our preference is that all of the food products used for forming meals and snacks should be natural and not the highly processed products that are so readily available in the supermarket. That would mean that there should be a minimal amount of products being promoted that are made or prepared with trans fatty acid-containing partially hydrogenated vegetable fats or with excessive amounts of the refined polyunsaturated oils with high amounts of omega 6 essential fatty acids. Natural, more saturated fat and oils such as butter, tallow, lard, coconut, palm and palm kernel oils should be encouraged rather than discouraged because of their health promoting components. These include the saturated fatty acids such as palmitic acid and lauric acid, both of which are needed in the diet - palmitic acid keeps lungs healthy and lauric acid helps the body fight many pathogenic bacteria and viruses.

Butter should be used instead of margarine. Milk and cheese products should preferably be full-fat. Nut and bean milks should be used judiciously knowing that they are not an appropriate replacement for cow or goat milk, and imitation cheese should be avoided. Eggs should be farm raised as opposed to factory raised.

Only during the last century has man's diet included a high percentage of refined carbohydrates. Our ancestors ate fruits and grains in their whole, unrefined state. In nature, sugars and carbohydrates—the energy providers—are linked together with vitamins, minerals, enzymes, protein, fat and fiber—the bodybuilding and digestion-regulating components of the diet. In whole form, carbohydrates support life, but refined carbohydrates are inimical to life because they are devoid of bodybuilding elements.

Grain products should be made with natural fats, not partially hydrogenated vegetable fats and oils. Amounts of grain products should be individualized with the realization that many individuals are carbohydrate sensitive. Grain products made with sugar or high fructose corn syrup and normally served as desserts should be recognized as foods for occasional consumption that may have excessive calories for some individuals. Fruits and vegetables should be encouraged to be grown organically.

Part of the reason for the existence of the Food Pyramid and Dietary Guidelines is the mistaken belief that these guidelines will decrease the development of heart disease in adults. The concept has been extended to children, and the idea of feeding children lower fat diets in an effort to ward off the development of heart disease in later life has gained acceptance among some pediatric research groups. In our opinion, this approach to feeding children is not healthy.

Pediatric clinicians noted a number of years ago that children who were put onto low-fat and low-cholesterol diets failed to grow properly.² And when researchers prominently associated with the American Heart Association fed children lower fat diets and measured some of the markers they consider important predictors of heart disease, they learned that these lower fat diets were causing the very problems they wanted to prevent. The children whose genes would normally have been producing the desirable

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form of LDL (light fluffy LDL) started to make the dangerous form of LDL (the small dense LDL).³

Beneficial fats and oils are found in meat and fish and fat in vegetables, nuts, and grains, or they can be added to foods through cooking and as dressings and sauces. A spoonful of beneficial fat or oil can be easily added to soup or stew or mixed dishes or hot cereals.

Beneficial fats are dairy fats such as butter, cream, and whole milk. Beneficial fats are natural fats from properly fed animals, poultry, and fish. These animal fats supply vitamin A, vitamin D, and the proper cholesterol needed for brain and vision development. Animal vitamin A is critical for growing children as they do not adequately convert the vitamin A precursor -- beta-carotene -- found in plants. The animal fats also supply other fat-soluble nutrients that support the immune system such as glycosphingolipids. Fish oils such as cod liver oil also supply important elongated omega-3 fatty acids as well as vitamins A and D.

Beneficial oils are those readily extracted from fruits such as olive oil, palm oil, coconut oil, and they are traditionally unrefined. Beneficial oils are also those that are unrefined and extracted from many nuts and seeds. Some of these oils are called omega-3 oils, omega-6 oils, and omega-9 oils. Oils with plenty of omega-3 include flaxseed oil and perilla oil; those with moderate amounts of omega-3 fatty acids include unrefined canola oil, soybean oil, and walnut oil. Many oils such as unrefined corn oil, safflower oil, and sunflower oil do not have much omega-3 but are typically high in omega-6 fatty acids, and they should be used in small amounts.

Foods for children should be chosen so that they supply a mixture of these different fats and oils. No one fat or oil can properly suit all purposes, although many of the good quality animal fats come close. They also need an amount of elongated omega-3 fats that come primarily from fatty fish and fish oils. Children need adequate amounts of the stable saturated fats; they need enough of the monounsaturated fats or oils; and they need an adequate amount and a proper balance of the essential fatty acids, which come primarily from the omega-3 and omega-6 oils. Importantly, these oils should not be partially hydrogenated or refined.

The members of the Weston A. Price Foundation thank you for the opportunity to speak today. We will be forwarding you an extensive set of written comments on the food pyramid based on our recommendations presented here.

References:

¹ Weir, C. Edith, "An Evaluation of Research in the United States on Human Nutrition, Report No. 2, Benefits from Nutrition Research," Human Nutrition Research Division, Agricultural Research Service, U. S. Department of Agriculture, August 1971.

² Smith, MM, and F. Lifshitz, Pediatrics, Mar 1994, 93:3:438-443.

³ Dreon, MD et al, American Journal of Clinical Nutrition 2000;71:1611-1616.

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