

ORAL TESTIMONY TO THE USDA DIETARY GUIDELINES COMMITTEE

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The proposed 2010 Dietary Guidelines perpetuate the mistakes of previous guidelines in demonizing saturated fats and animal foods rich in saturated fatty acids such as egg yolks, butter, whole milk, cheese, fatty meats like bacon and animal fats for cooking. The current obesity epidemic emerged as vegetable oils and refined carbohydrates replaced these healthy, nutrient-dense traditional fats. Animal fats supply many essential nutrients that are difficult to obtain from other sources. Furthermore, basic biochemistry shows that the human body has a very high requirement for saturated fats and cholesterol in all cell membranes; if we do not eat saturated fats, the body will simply make them from carbohydrates, but excess carbohydrate increases blood levels of triglyceride and small, dense LDL and compromises blood vessel function. High-carbohydrate diets, moreover, fail to satisfy the appetite as well as diets rich in traditional fats, leading to higher caloric intakes and often to bingeing and splurging on empty foods, resulting in rapid weight gain.

The proposed guidelines will perpetuate existing nutrient deficiencies present in all American population groups, including deficiencies in vitamins A, and D, found in animal fats, vitamins B12 and B6 found in meat and seafood, as well as minerals like iron and zinc. Low intakes of vitamin K2, moreover, are associated with increases in the risk of osteoporosis, heart disease and cancer, and the main sources of vitamin K2 available to Americans are egg yolks and full-fat cheeses.

By restricting healthy animal fats in school lunches and diets for pregnant women and growing children, the Guidelines will perpetuate the tragic epidemic of learning and behavior disorders. The nutrients found in most abundantly and in some cases exclusively in animal fats—including choline, cholesterol and arachidonic acid—are critical for the development of the brain and the function of receptors that modulate thinking and behavior. Studies show that choline from egg yolks and liver helps the brain make critical connections and protect against neurotoxins; animal studies suggest that if choline is abundant during developmental years, the individual is protected for life from developmental decline. The National Academy of Sciences recommends 375 mg per day for children nine through thirteen years of age, 450 mg for pregnant women and 550 mg for lactating women and men aged fourteen and older. These amounts are provided by four or five egg yolks per day—but that would entail consuming 800-1000 mg cholesterol, a crime by USDA standards. The committee referred to this as the “choline problem.” Pregnant women and growing children especially need to eat as many egg yolks as possible—yet the Guidelines demonize this nutrient-dense food.

Choline is also essential to liver health. As the prevalence of obesity has grown to reach epidemic proportions, “fatty liver disease” has emerged as one of its casualties. It is estimated that 40 percent of obese Americans have fatty liver. One of the most common ways to induce this disease in animals is to feed diets deficient in choline and methionine, an amino acid found abundantly in meat. Restricting animal foods in our children’s meals will thus aggravate the consequences of the obesity epidemic.

The Guidelines lump *trans* fats together with saturated fats—calling them Solid Fats—thereby hiding the difference between unhealthy industrial *trans* fats and healthy traditional saturated fats. *Trans* fats contribute to inflammation, depress the immune system, interfere with hormone production and set up pathological conditions leading to cancer and heart disease, whereas saturated fats fight inflammation, support the immune system, support hormone production and protect against cancer and heart disease.

The vitamins and fatty acids carried uniquely in saturated animal fats are critical to reproduction. The 2010 Guidelines will increase infertility in this country, already at tragically high rates.

The Guidelines mandate salt restriction, which will lead to increased digestive problems, fatigue, mental decline and overeating. Salt is critical to digestion, maintenance of blood pressure and neurological development. If food is not adequately salted, people will need to consume more food in order to meet their requirements for sodium and chlorine. Food processors add more artificial flavors such as MSG to low-salt foods in order to maintain palatability. MSG is neurotoxic and is used to induce obesity in laboratory animals. (Do a Medline search for “MSG-induced obesity.”)

The 2010 proposed Guidelines represent a national scandal, the triumph of industry clout over good science and common sense. It must be emphasized that the Guidelines are not based on science but are designed to promote the products of commodity agriculture and—through the back door—encourage the consumption of processed foods. For while the USDA food police pay lip service to reducing our intake of refined sweeteners, *trans* fats, white flour and salt, this puritanical lowfat prescription ultimately leads to cravings and indulgence in chips, sweets, sodas, breads, desserts and other empty food-and-beverage-like products just loaded with refined sweeteners, *trans* fats, white flour and artificial flavorings.

While the ship of state is sinking under a health crisis of enormous proportions, the proposed 2010 Guidelines simply rearrange the deck chairs on the Titanic. Without more sensible recommendations, the trend to obesity, learning disorders, chronic disease and infertility will accelerate.

The Weston A. Price Foundation proposes starting over and adopting our Healthy 4 Life Dietary Guidelines, based on four food groups, always with an emphasis on quality through pasture-based feeding and organic, pesticide-free production methods:

HEALTHY 4 LIFE DIETARY GUIDELINES

Every day, eat high quality, whole foods to provide an abundance of nutrients, chosen from each of the following four groups:

- 1. Animal foods:** meat and organ meats, poultry, and eggs from pastured animals; fish and shellfish; whole raw cheese, milk and other dairy products from pastured animals; and broth made from animal bones.
- 2. Grains, legumes and nuts:** whole-grain baked goods, breakfast porridges, whole grain rice; beans and lentils; peanuts, cashews and nuts, properly prepared to improve digestibility.
- 3. Fruits and Vegetables:** preferably fresh or frozen, preferably locally grown, either raw, cooked or in soups and stews, and also as lacto-fermented condiments.
- 4. Fats and Oils:** unrefined saturated and monounsaturated fats including butter, lard, tallow and other animal fats; palm oil and coconut oil; olive oil; cod liver oil for vitamins A and D.

Avoid: foods containing refined sweeteners such as candies, sodas, cookies, cakes etc.; white flour products such as pasta and white bread; processed foods; modern soy foods; polyunsaturated and partially hydrogenated vegetable oils and fried foods.

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