

November 9, 2020

The Honorable Sonny Perdue
Secretary of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

The Honorable Alex Azar
Secretary of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Dear Secretaries Perdue and Azar:

As your Departments finalize the 2020 Dietary Guidelines for Americans (DGA), the Low-Carb Action Network (L-CAN) respectfully asks that the final document include a prominent statement that its recommendations are “Only for Healthy Americans” so that those with diet-related chronic diseases will know that these Guidelines are not appropriate for them. We further request that you begin work on alternative policy recommendations to inform the USDA Feeding Assistance Programs, since these programs must be appropriate for all Americans, both those who are healthy and those with diet-related chronic diseases. The DGA can inform the former group but not the latter. Other treatment guidelines need to be used to select foods for those populations with diet-related, chronic diseases.

L-CAN is a coalition representing medical doctors, nutritionists, and Americans who have benefitted from diets that are low in carbohydrates.

The statutory language authorizing the DGA states that this policy should be advice for the “general public,” and indeed, the general public was largely healthy in 1980, when the DGA was first issued. Yet today, the “general public” is clearly not healthy. Today, 60% of Americans have one or more chronic, diet-related disease.

This 60% includes 42.4% of adults with obesity.¹ In addition, more than half of Americans have pre-diabetes or type-2 diabetes.² The DGA policy has clearly failed to stem the tide of these terrible diseases. Although there can be many explanations for this failure, we would submit that telling the American public to obtain more than half of its calories from carbohydrates, including six servings of grains per day, is not a formula for good health. Upon being consumed, grains convert to sugar instantly in the body—the same as table sugar—and the science increasingly shows that the continuous consumption of sugar provokes obesity, diabetes and other metabolic conditions.

This issue is also relevant to Covid-19, since Americans with these underlying disease conditions have been shown to be far more vulnerable to complications from the Coronavirus, including hospitalization and death.

The DGA has long stated that its mission is the prevention, not the treatment, of chronic disease. However, the DGA has also stated that helping Americans “reach and maintain a healthy weight” was among its three primary goals.³ It is therefore inexplicable why the 2020 DGAC decided to exclude all studies on weight loss.

Even studies on disease prevention, which should qualify for consideration according to DGA’s goals, were excluded. L-CAN submitted 65 low-carb studies to the DGAC that have, as their primary goal, the mitigation of metabolic conditions that lead to diabetes, obesity, hypertension, and heart disease. We have an additional 70 studies that the DGAC did not consider in its review of scientific literature in which weight loss is not the primary goal. Nearly all these studies were excluded.

Because the 2020 DGA process did not include any consideration of studies designed to treat chronic disease, not even obesity, the DGA’s recommendations cannot be considered informed or appropriate for populations with diet-related diseases.

We therefore believe that the DGA should include a clear statement that its guidance is only for Americans who are healthy.

Secondly, we believe that an alternative policy must be developed to inform USDA Feeding Programs, since populations receiving this nutritional assistance suffer from high rates of diet-related diseases. The policy around USDA feeding programs should be revised to include additional policy guidance on disease *treatment* that would be relevant for the many millions of people with a chronic disease who are receiving this food assistance.

Thank you in advance, Mr. Secretaries, for considering our views.

Sincerely yours,

Low-Carb Action Network

¹ <https://www.cdc.gov/obesity/data/adult.html>

² <https://www.healthline.com/health-news/more-than-half-of-us-adults-have-diabetes-or-prediabetes-090915>

³ <https://health.gov/our-work/food-nutrition/about-dietary-guidelines>