Dear Members of the 2020 Dietary Guidelines Advisory Committee:

We, the undersigned, urge the DGAC to amend its proposed protocol to answer the question: What is the relationship between types of dietary fat consumed and risk of cardiovascular disease? The proposed protocol would only include a literature search of studies published since 2000. We urge the DGAC to amend the protocol to ensure that the highest-quality randomized controlled trials with CVD or LDL-cholesterol endpoints conducted before 2000 are included either individually or as part of a meta-analysis or systematic review.

The results of numerous pre-2000 randomized controlled trials are invaluable because few post-2000 trials have had cardiovascular endpoints, and few post-2000 RCTs with LDL-cholesterol endpoints have been conducted in metabolic wards. Omitting these RCTs would exclude much of the most crucial evidence needed to answer the DGAC’s question.

Other expert committees that have answered this question have relied heavily on pre-2000 RCTs. For example, a 2017 advisory from the American Heart Association concluded that “taking into consideration the totality of the scientific evidence, satisfying rigorous criteria for causality, we conclude strongly that lowering intake of saturated fat and replacing it with unsaturated fats, especially polyunsaturated fats, will lower the incidence of CVD.” A key underpinning of that conclusion was that “randomized controlled trials that lowered intake of dietary saturated fat and replaced it with polyunsaturated vegetable oil reduced CVD by ≈30%, similar to the reduction achieved by statin treatment.” Those RCTs were published long before 2000.
Similarly, in 2016, the WHO published a systematic review and regression analysis on the effects of saturated fatty acids on serum lipids and lipoproteins. The vast majority of the RCTs included in that review were published before 2000. Likewise, the 2018 WHO draft guidelines on saturated and trans fats included numerous RCTs that were published before 2000.

According to USDA, the decision to exclude existing SRs and MAs was made because it was “suggested” by the National Academies’ report on the Dietary Guidelines. In fact, the Academies’ report noted that “with limited resources, it would be advantageous to leverage existing systematic reviews, meta-analyses, and reports to minimize unnecessary replication of efforts,” and the report concluded that the use of high-quality existing SRs and MAs “is generally appropriate and encouraged.”

We understand that it would be impractical to review all evidence on dietary fats and CVD published since the 1960s. However, the DGAC cannot conduct a scientifically rigorous review of the evidence on dietary fats and CVD if it excludes all high-quality pre-2000 RCTs with CVD or LDL-cholesterol endpoints.

Henry Blackburn, MD
Mayo Professor Emeritus
School of Public Health
University of Minnesota

Carlos A. Camargo, MD, DrPH
Professor of Emergency Medicine & Medicine
Harvard Medical School
Professor of Epidemiology
Harvard T.H. Chan School of Public Health
Conn Chair in Emergency Medicine
Massachusetts General Hospital

Alan Chait, MD
Edwin L. Bierman Professor of Medicine
Division of Metabolism, Endocrinology & Nutrition
University of Washington

William Dietz, MD, PhD
Director, Redstone Global Center for Prevention and Wellness
Milken Institute School of Public Health
George Washington University

Robert H. Eckel, MD
Professor of Medicine Emeritus
Division of Endocrinology, Metabolism and Diabetes
Division of Cardiology
Professor of Physiology and Biophysics, Emeritus
Charles A. Boettcher II Chair in Atherosclerosis
University of Colorado Anschutz Medical Campus

Christopher Gardner, PhD
Rehnborg Farquhar Professor of Medicine
Stanford Prevention Research Center
Stanford University
Antonio M. Gotto, MD, DPhil
Dean Emeritus
Weill Cornell Medicine
Provost for Medical Affairs Emeritus
Cornell University

Philip Greenland, MD
Harry W. Dingman Professor
Department of Preventive Medicine
Feinberg School of Medicine
Northwestern University

Frank Hu, MD, PhD, MPH
Chair, Department of Nutrition
Fredrick J. Stare Professor of Nutrition and Epidemiology
Harvard T.H. Chan School of Public Health

Lewis H. Kuller, MD, DrPH
Professor of Epidemiology Emeritus
Graduate School of Public Health
University of Pittsburgh

Bonnie F. Liebman, MS
Director of Nutrition
Center for Science in the Public Interest

JoAnn E. Manson, MD, DrPH
Professor of Medicine and the
Michael and Lee Bell Professor of Women's Health
Harvard Medical School
Professor, Department of Epidemiology
Harvard T.H. Chan School of Public Health

Michael Miller, MD
Professor of Cardiovascular Medicine, Epidemiology & Public Health
University of Maryland School of Medicine
Director, Center for Preventive Cardiology
University of Maryland Medical Center

Marion Nestle, PhD, MPH
Paulette Goddard Professor of Nutrition,
Food Studies, and Public Health Emerita
New York University

Eric Rimm, ScD
Professor of Medicine
Harvard Medical School
Channing Division of Network Medicine
Brigham and Women's Hospital
Director, Program in Cardiovascular Epidemiology
Harvard T.H. Chan School of Public Health
Jennifer G. Robinson, MD, MPH  
Professor, Departments of Epidemiology & Medicine  
Director, Prevention Intervention Center  
University of Iowa

Frank Sacks, MD  
Professor of Cardiovascular Disease Prevention  
Harvard T.H. Chan School of Public Health  
Professor of Medicine  
Harvard Medical School

Meir Stampfer, MD, DrPH  
Professor of Medicine  
Harvard Medical School  
Professor of Epidemiology and Nutrition  
Harvard T.H. Chan School of Public Health

Mary Story, PhD, RD  
Professor, Global Health, and Family Medicine and Community Health  
Associate Director for Academic Programs  
Duke Global Health Institute  
Duke University

Paul K. Whelton, MB, MD, MSc  
Show Chwan Professor of Global Public Health  
Department of Epidemiology  
Tulane University School of Public Health and Tropical Medicine  
Tulane University of Medicine

Walter Willett, MD, DrPH  
Professor of Epidemiology and Nutrition  
Harvard T.H. Chan School of Public Health  
Professor of Medicine  
Harvard Medical School