

**American Society for Nutrition (ASN) Comments on the draft World Health Organization (WHO)
Guideline: Total fat intake for adults and children draft guideline**

ASN Comment on WHO Summary of evidence chapter of draft guideline (page 20-27):

The priority health outcome considered by the WHO to develop the total fat intake guideline was unhealthy weight gain (as assessed by various measures of body fatness including body weight, BMI, waist circumference, skinfold thickness, percentage body fat), and adverse events (i.e., potential harms). Investigations used to support a total fat recommendation often do not have data on energy balance of the individuals participating in the study. Metabolic implications of the quantity and type of fat consumed are impacted by whether one is in negative, positive, or stable energy balance. Thus, within any effort to derive a number for total fat consumption, there should be some comment about the energy balance of subjects. Any report and recommendations issued should note the absence of such valuable data, if that is the case, and the subsequent implications for any recommendations made.

ASN Comment on WHO Evidence to recommendations chapter of draft guideline (page 28-31):

ASN appreciates that the recommendation related to total fat is considered *conditional* because some individuals who reduce their fat intake might replace energy from dietary fat with energy from low nutrient density foods, reducing their overall health benefit. It is important to frame all recommendations in the context of overall diet quality and dietary patterns vs. specific food components or food groups.

ASN Comment on WHO Recommendations and supporting information chapter of draft guideline (page 32-35):

The recommendations in the WHO draft guideline for total fat, saturated fat, and *trans* fat are in line with recommendations from other expert committees and authoritative documents, including the 2020 *Dietary Guidelines for Americans*, which recommend that saturated fat consumption be less than 10% of calories per day and that *trans* fat consumption to be as low as possible; the 2020 Dietary Guidelines Advisory Committee Scientific Report which found that “Strong evidence demonstrates that replacing saturated fatty acids with polyunsaturated fatty acids in adults reduces the risk of coronary heart disease events and cardiovascular disease mortality;” and the 2005 National Academies report “Dietary Reference Intakes for Energy, Carbohydrate, Fiber, Fat Fatty Acids, Cholesterol, Protein and Amino Acids” which recommends that adults consume 20-35% of calories from fat.