

**OFFICE OF THE GOVERNOR**

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**PETITION FOR  
EXECUTIVE ACTION**

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**Date: June 7, 2022**

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**SUBMITTED TO**

The Honorable Tony Evers  
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**SUBMITTED BY**

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## **INTRODUCTION**

The Physicians Committee for Responsible Medicine is a nonprofit public health organization that advocates for preventive medicine through proper nutrition, encourages higher standards for ethics and effectiveness in medical research, and conducts clinical research on the relationships between food and disease. Established in 1985, the Physicians Committee is a national organization representing more than 175,000 members, including 17,000 physicians, as well as other medical professionals, scientists, and laypersons.

The Physicians Committee has monitored national nutrition policy since 1991, when the organization issued recommendations on the U.S. Department of Agriculture's Eating Right Pyramid, the food diagram that interpreted and accompanied the Dietary Guidelines for Americans. For each edition of the Dietary Guidelines since then, the Physicians Committee has actively participated in the public processes regarding the establishment of the Dietary Guidelines Advisory Committee and the subsequent publication of the advisory committee report and revised Dietary Guidelines.

In recent years, the Physicians Committee has lobbied for state and local legislation intended to control the spread of COVID-19. The organization also designed "Cooking & More to Combat COVID-19," a free curriculum to support those with underlying conditions and health disparities in reducing their risk of COVID-19. The program was co-hosted by the Navajo Nation office of the President and Vice President. A free eight-week "Fight COVID-19 with Food" nutrition class series followed. The Physicians Committee also publishes the Nutrition Guide for Clinicians, a diagnostic and treatment mobile application tool that includes critical chapters related to COVID-19.

As set forth below, the Physicians Committee requests that you take immediate action to halt the Department of Agriculture, Trade and Consumer Protection's ("DATCP") implementation of the recently announced Meat Talent Development and Meat and Poultry Supply Chain Resiliency Grant programs, both of which unjustifiably fund unhealthful food industries under the guise of addressing the COVID-19 pandemic.

## **LEGAL FRAMEWORK**

The American Rescue Plan Act ("ARPA") provides funds to states, territories and tribal government funds for the following purposes:

(A) to respond to the public health emergency with respect to the Coronavirus Disease 2019 (COVID-19) or its negative economic impacts, including assistance to households, small businesses, and nonprofits, or aid to impacted industries such as tourism, travel, and hospitality;

(B) to respond to workers performing essential work during the COVID-19 public health emergency by providing premium pay to eligible workers of the State, territory, or Tribal government that are performing such essential work, or by providing grants to eligible employers that have eligible workers who perform essential work;

(C) for the provision of government services to the extent of the reduction in revenue of such State, territory, or Tribal government due to the COVID-19 public health emergency relative to revenues collected in the most recent full fiscal year of the State, territory, or Tribal government prior to the emergency; or

(D) to make necessary investments in water, sewer, or broadband infrastructure.

42 U.S.C.S. § 802(c)(1). The ARPA also appropriated to the Secretary of Agriculture \$4,000,000,000 to, among other things, “make loans and grants and provide other assistance to maintain and improve food and agricultural supply chain resiliency.” American Rescue Plan Act of 2021, Pub. L. 117-2, § 1001(b)(4) (2021).

DATCP is an agency as that term is defined by the Wisconsin Administrative Procedure Act. Wis. Stat. § 227.01(1). Under the Act, agency action must be set aside or modified if “the agency has erroneously interpreted a provision of law and a correct interpretation compels a particular action.” Wis. Stat. § 227.57(5).

## **FACTUAL BACKGROUND**

Early this year, you announced “up to \$5 million in American Rescue Plan Act (ARPA) funding for meat talent development programming . . . to attract students to meat careers, provide financial support to students in Wisconsin meat processing training programs, support program development, and connect the meat processing industry with potential employees.” DATCP, Meat Talent Development (2022), <https://datcp.wi.gov/Pages/AgDevelopment/MeatTalentDevelopment.aspx>. To administer the program, DATCP stated that it “will work cooperatively with stakeholders and the industry to implement a program that strengthens Wisconsin’s meat processing supply chain and workforce.” *Id.*

Two weeks ago, you “created the Meat and Poultry Supply Chain Resiliency Grant, investing up to \$10 million to continue to grow Wisconsin’s meat processing industry and improve the long-term viability of the state’s livestock industry.” DATCP, Meat and Poultry Supply Chain Resiliency Grants (2022), <https://datcp.wi.gov/Pages/AgDevelopment/MeatPoultrySupplyChainResiliencyGrants.aspx>. “Funded through the American Rescue Plan Act (ARPA), Wisconsin meat processors will have the ability to apply for grants of up to \$150,000” distributed by DATCP. Press Release, Office of the Governor, *Gov. Evers Announces an Additional \$10 Million Investment in Meat Processing Infrastructure* (May 23, 2022), available at <https://content.govdelivery.com/accounts/WIGOV/bulletins/318c98d>.

These programs as touted as exemplifying the “Governor’s continued commitment to invest in and support programs that reduce barriers to employment, provide skills and job training opportunities, and ensure growth and retention of Wisconsin’s workforce, in addition to building long-term success in the state’s food processing industry.” *E.g.*, Press Release, Office of the Governor, *Gov. Evers, DATCP Announce Investment in Statewide Meat Talent Development* (Jan. 11, 2022), available at <https://content.govdelivery.com/accounts/WIGOV/bulletins/303e66d>.

But these programs benefit only a narrow and harmful segment of “the state’s food processing industry,” despite the administering agency’s stated mission of “promoting quality food, healthy plants and animals, sound use of land and water resources, and a fair marketplace.” DATCP, *Welcome to DATCP*, <https://datcp.wi.gov/Pages/Homepage.aspx> (last visited May 26, 2022). The programs also exacerbate the public health emergency that the ARPA seeks to address.

It is well-established that nutritional factors are key for the prevention and amelioration of the underlying health conditions that increase COVID-19 morbidity and mortality, particularly obesity, diabetes, and hypertension. A low-fat plant-based diet significantly improves control in each of these conditions and is superior in safety and efficacy, compared with other therapeutic diets.

Studies suggest that a plant-based diet may reduce the risk of developing severe COVID-19. A 2021 case-control study of health care workers in 6 countries revealed that those following plant-based diets had 73% lower odds of developing moderate to severe COVID-19, compared with those following other diets. In contrast, low-carbohydrate, high-protein diets were associated with 48% greater odds of moderate to severe COVID-19.<sup>1</sup>

Similarly, the smartphone-based COVID Symptom Study, including 592,571 participants of whom 31,815 developed COVID-19, found that dietary patterns that were highest in fruits, vegetables, and plant-based foods in general were associated with a 41% lower risk of severe COVID-19 and a 9% reduction of COVID-19 infection of any severity, compared with diets lowest in these foods.<sup>2</sup>

Additionally, nutrition may influence the effectiveness of vaccination due to its effect on underlying conditions that modulate immune response. In a 2021 study, the ability of the Pfizer COVID-19 vaccine to stimulate an effective immune response was studied in 86 health care workers. Response to the vaccine was inversely associated with waist circumference. In other words, increased body weight was associated with poorer vaccine efficacy. Elevated plasma cholesterol levels, high blood pressure, and smoking also impaired the response to the vaccine.<sup>3</sup>

Yet these newly announced ARPA-funded programs do nothing to improve food and agricultural supply chain resiliency with respect to plant-based foods. Instead, they dole out undeserved financial handouts to two food industries—meat and poultry—that worsen the health of Wisconsinites.

Consuming two or more servings of red or processed meat per week can increase one’s risk for colorectal cancer, according to a study presented in 2015 at the National Cancer Research Institute Cancer Conference. Researchers in that study examined dietary data from the UK Biobank, encompassing 500,000 men and women, for red meat consumption and bowel cancer incidence rates. Participants who ate red meat four or more times per week had a 42 percent increased risk for colorectal cancer, compared with those who ate it less than once per week. Those who consumed processed meat two or more times per week increased their risk for colorectal cancer by 18 percent, compared with those who consumed none.<sup>4</sup> Avoiding these products was associated with reduced risk.

The World Health Organization released a 2015 report based on an examination of more than 800 studies. The report classified consumption of red meat as “probably carcinogenic to humans” and consumption of processed meat as definitively “carcinogenic to humans,” the latter on the basis of sufficient evidence for colorectal cancer. The report also observed associations between red and processed meat consumption and stomach, pancreatic, and prostate cancers.<sup>5</sup> Processed meat is also associated with breast cancer risk, among other health problems.<sup>6</sup>

A 2019 University of Oxford study concluded that eating just one slice of bacon a day is linked to higher risk of colorectal cancer.<sup>7</sup> According to a more recent study published in the *International Journal of Cancer*, a diet high in red meat increases risk for colon cancer in women.<sup>8</sup> The American Medical Association now calls on U.S. “hospitals to improve the health of patients, staff, and visitors by . . . eliminating processed meats from menus.”<sup>9</sup> Adults born around 1990 have twice the risk of colon cancer and four times the risk of rectal cancer compared with adults born around 1950, according to the National Cancer Institute.<sup>10</sup>

According to a 2012 study from the Harvard School of Public Health, eating red meat increases the risk of dying prematurely, including from heart disease or cancer. Among a group of 121,342 individuals followed for up to 28 years, each daily serving of red meat increased the risk of dying by 12 percent. For processed meat (e.g., hot dogs, ham, or bacon), each daily serving increased the risk of death by 20 percent. Conversely, those individuals avoiding these products had corresponding reductions in risk, compared with those eating them.<sup>11</sup>

Red and white meat raise cholesterol levels equally, according to an NIH-funded randomized crossover study published in the *American Journal of Clinical Nutrition*. Researchers tested the effects of low-saturated-fat diets that drew their protein from red meat (beef and pork), white meat (chicken and turkey), or nonmeat sources (legumes, nuts, grains, and soy products) in 51 participants—all of whom tested each of the three diets separately for four weeks. They then did the same with high-saturated-fat diets, drawing their protein from the same red, white, and nonmeat sources, in 62 participants. Both white and red meat raised LDL (“bad”) cholesterol, compared with plant-based proteins and did so to about the same extent. The researchers pointed out that their findings supported favoring meatless protein sources and that white meat was no better than red meat when it comes to heart disease risk.<sup>12</sup>

## **CONCLUSION: ACTION REQUESTED**

To improve the health and wellbeing of Wisconsinites, we request an immediate halt to the Meat Talent Development and Meat and Poultry Supply Chain Resiliency Grant programs and their replacement with ARPA-funded programs that maintain and improve food and agricultural supply chain resiliency for plant-based foods that reduce the risk of developing severe COVID-19.

## **SCIENTIFIC REFERENCES**

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