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Secretary of Health Robert F. Kennedy Jr. The U.S. Department of Health & Human Services 200 Independence Avenue, S.W. Washington, D.C. 20201

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# Subject: Autism Initiative: Act Now on Neu5Gc and Seed Oil Risks

#### Abstract:

We urge the inclusion of two underexplored but biologically plausible dietary factors in the autism research initiative: (1) the immune response to **Neu5Gc**, a non-human sialic acid found in red meat and cow dairy that becomes incorporated into human tissues and may provoke chronic inflammation; and (2) the neurodevelopmental and immune-disrupting effects of **industrial seed oils**, rich in linoleic acid and known to promote oxidative stress and alter brain gene expression. Both exposures have risen sharply in modern diets, are testable using existing models, and are modifiable through safe, practical dietary changes — making them urgent and actionable targets in the effort to prevent autism. These same mechanisms may also have bearing on Alzheimer's and cardiovascular disease.

#### BY EMAIL AND CERTIFIED MAIL

#### Dear Secretary Kennedy and Staff:

First, allow me to commend your bold initiative to launch a comprehensive international research effort aimed at uncovering the causes of autism spectrum disorder (ASD). Your willingness to explore environmental, dietary, immunological, and developmental contributors without ideological restriction is both rare and urgently needed.

I am writing to highlight two **underexplored but credible biological pathways** that may play a role in the rise of autism, neurodegenerative diseases like Alzheimer's, and cardiovascular conditions:

- 1. The **immune response to Neu5Gc** (N-glycolylneuraminic acid), a non-human sialic acid found in red meat and cow dairy, and
- 2. The **inflammatory and neurological effects of industrial seed oils**. These oils are now ubiquitous in processed foods and children's diets.

Although I am not a researcher myself, I have followed these issues for over a decade, having adopted a Neu5Gc-free diet since 2009 and tracked developments in sialic acid biology and dietary inflammation. I believe these dietary exposures are **modifiable**, **testable**, **and mechanistically plausible**, and both deserve focused attention as part of your broader investigation.

# Background

Humans lost the ability to synthesize Neu5Gc millions of years ago due to a mutation in the **CMAH gene**. However, Neu5Gc is present in red meat and cow dairy products. Upon consumption, Neu5Gc can be absorbed and **incorporated into human tissues**, including epithelial, vascular, and neural tissue.

Because Neu5Gc is not a natural human molecule, we all produce **anti-Neu5Gc antibodies**. This mismatch leads to **chronic immune activation** at Neu5Gc-laden tissues—a process referred to as **xenosialitis**.

Dr. Ajit Varki (UC San Diego) and others have demonstrated that:

- Neu5Gc becomes metabolically incorporated into human cells.
- Anti-Neu5Gc antibodies are present in all humans and can trigger chronic inflammation.
- CMAH-deficient (CMAH-KO) mice fed Neu5Gc and exposed to antibodies exhibit heightened inflammation, tumor growth, and accelerated vascular disease.

"Chronic inflammation resulting from the immune response to Neu5Gc may contribute to a variety of diseases, including cancer and atherosclerosis." — Varki, *PNAS*, 2010

While Neu5Gc is unusual in that it becomes physically incorporated into human tissues and then targeted by our own immune system, it is not the only modern dietary factor associated with chronic inflammation. **Industrial seed oils**, particularly those high in omega-6 linoleic acid, are also increasingly linked to oxidative stress, immune dysregulation, and brain gene disruption — all of which may contribute to rising rates of autism, Alzheimer's disease, and cardiovascular conditions.

# Relevance to Autism, Alzheimer's Disease, and Heart Disease

Emerging evidence suggests that **Neu5Gc-driven immune activation** and **seed oil-induced inflammation** may both play roles in the development of modern chronic diseases, particularly those affecting the brain and cardiovascular system.

- In utero exposure: Maternal diets high in Neu5Gc (red meat, cow dairy) may lead to fetal tissue incorporation. Maternal anti-Neu5Gc antibodies could target fetal cells, possibly triggering maternal immune activation (MIA) a recognized pathway for increased autism risk.
- Postnatal exposure: Young children consuming Neu5Gc-containing foods (e.g., beef-based baby foods, cow's milk, dairy formula) may incorporate Neu5Gc during critical windows of brain development. Their own developing immune system may recognize this molecule as foreign, possibly leading to chronic low-grade inflammation or immune interference with neuronal signaling. This concern is magnified by the fact that many foods marketed to young children including macaroni and cheese, cheese snacks, yogurts, and other dairy-based products are disproportionately rich in cow-derived Neu5Gc, increasing exposure during a sensitive period of neurodevelopment.
- Neurodevelopmental impact: Sialic acids are vital for neuronal communication, brain development, and immune modulation. In humans, the normal sialic acid is Neu5Ac. The incorporation of Neu5Gc, a non-human sialic acid found in red meat and cow dairy, may represent a disruptive alteration of normal neuronal glycosylation patterns. This aberrant incorporation could impair neurodevelopmental signaling and provoke immune responses in the brain mechanisms that plausibly contribute to conditions such as autism.
- **Alzheimer's disease**: Chronic neuroinflammation and altered glycosylation are hallmarks of AD. While Neu5Gc has not yet been directly linked to Alzheimer's pathology, its presence in aging tissues and ability to provoke immune activation raise

biologically plausible concerns that deserve further investigation.

- Cardiovascular disease: Neu5Gc has been strongly implicated in the development of atherosclerosis through chronic vascular inflammation. In CMAH-deficient mouse models that mimic human sialic acid biology, Neu5Gc-fed animals developed accelerated plaque formation when exposed to anti-Neu5Gc antibodies mimicking the human immune reaction. This suggests that lifelong Neu5Gc exposure from red meat and dairy may contribute directly to the immune-driven vascular damage underlying heart disease.
- Seed oil-related pathways: In parallel, industrial seed oils rich in omega-6 linoleic acid have been shown to promote chronic inflammation and oxidative stress. Animal studies have demonstrated that diets high in soybean oil alter brain gene expression in pathways relevant to autism, hormone regulation, and neuroinflammation. These oils may also disrupt mitochondrial function and immune balance, contributing to both neurodevelopmental disorders and chronic cardiovascular conditions. Given their massive increase in use over the past century and near-ubiquity in children's diets, these oils represent a second dietary vector of concern deserving equal scientific scrutiny.

# **Epidemiological Timing**

The rise in autism, Alzheimer's disease, and heart disease over the 20th and 21st centuries tracks closely with the industrialization and mass consumption of red meat and cow dairy, the two primary dietary sources of Neu5Gc.

Red meat and dairy consumption increased dramatically in the U.S. between 1900 and 1970 due to refrigeration, centralized meatpacking, federal food programs, and dietary guidelines promoting animal protein and calcium. During this time, Alzheimer's disease emerged as a leading cause of death, autism diagnoses began their steep climb in the late 20th century, and cardiovascular disease became the dominant cause of mortality — despite reductions in smoking and major advances in medical intervention.

Concurrently, the widespread introduction of industrial seed oils (e.g., soybean, corn, canola) — now ubiquitous in processed foods and restaurant cooking — also closely parallels this rise. These oils are high in linoleic acid, an omega-6 fatty acid that promotes chronic inflammation and oxidative stress. Experimental studies have shown that excessive omega-6 intake can alter brain gene expression, disrupt mitochondrial integrity, and impair immune regulation — all plausible pathways for neurodevelopmental and cardiovascular dysfunction.

While correlation is not causation, this alignment reinforces the need to investigate **Neu5Gc as a shared environmental contributor** — particularly given its demonstrated incorporation into human tissues, its ability to trigger chronic immune responses, and its direct experimental link to **vascular inflammation and atherosclerosis** in animal models that replicate human Neu5Gc biology.

# Why This Matters

Despite its biological plausibility and clear link to chronic inflammation in cancer and cardiovascular disease models, **Neu5Gc has received little attention in autism research and virtually none in public health nutrition discourse**. This is a critical oversight. The molecule is **non-native to humans**, yet is **readily incorporated into human tissues**, provoking an immune response that has been extensively documented in laboratory settings.

Similarly, **industrial seed oils** — now dominant in processed foods and children's diets — are increasingly linked to **immune dysregulation**, **mitochondrial stress**, **and neurodevelopmental disruption**, yet remain largely absent from official consideration in chronic disease etiology. These oils are high in linoleic acid, which oxidizes easily and generates toxic lipid byproducts that can damage developing brain tissue and vascular systems.

Unlike many environmental theories that rely on speculative exposures or unverifiable correlations, both the **Neu5Gc** and **seed oil** hypotheses are **mechanistically grounded**, **supported by laboratory evidence**, **and testable using existing tools** — including **CMAH-knockout mice**, **maternal immune activation models**, and **gene expression analyses** in animal models fed relevant diets.

If confirmed, the implications are substantial: these two modern dietary exposures could represent **shared upstream factors** in the rise of multiple chronic conditions — and both are **modifiable through simple, low-cost dietary changes**. That makes them uniquely actionable targets in the broader effort to understand and prevent autism, Alzheimer's, and cardiovascular disease.

# **Dietary Implications**

Avoiding **Neu5Gc** is not difficult. It simply requires reducing or eliminating foods derived from **non-human mammals** — namely, **beef**, **lamb**, **pork**, **and cow dairy** — which are the primary dietary sources. Safe and nutritionally adequate alternatives include **poultry**, **fish**, **eggs**, **plant-based milks**, and even **goat or sheep cheeses**, all of which contain little or no Neu5Gc and do not provoke the same immune response.

Human breast milk is Neu5Gc-free and supports optimal early brain development through human-compatible sialic acids like Neu5Ac. In contrast, infant formulas made from cow's milk introduce Neu5Gc during a highly vulnerable developmental window.

In parallel, reducing dietary intake of **industrial seed oils** — including **soybean**, **corn**, **canola**, **and sunflower oils** — may also help lower chronic inflammation and neurodevelopmental risk. These oils are high in **omega-6 linoleic acid**, a fat that oxidizes easily and is implicated in mitochondrial stress and immune dysregulation. Replacing these with **traditional fats** (e.g., olive oil, avocado oil, moderate animal fats like ghee) may provide a safer lipid profile, particularly for pregnant women and developing children. These dietary adjustments are **practical**, **cost-neutral**, **and culturally adaptable**, and could be implemented proactively while further research is underway. If Neu5Gc and seed oil mechanisms are confirmed contributors to autism, Alzheimer's, or heart disease, then **public health guidance could pivot quickly and responsibly** to reduce exposure — without relying on medication, mandates, or costly interventions.

# **Proposed Action**

I urge your team to include **Neu5Gc-related pathways** in the scope of your autism and chronic disease research initiative. Specifically:

#### Neu5Gc-Focused Research:

- Investigate **maternal diet** and **anti-Neu5Gc antibody levels** in autism spectrum disorder (ASD) case-control cohorts.
- Examine **fetal tissue and brain bank samples** for Neu5Gc incorporation and associated inflammatory markers.
- Fund mechanistic studies using **CMAH-knockout mice** fed Neu5Gc during gestation and early development, with neurodevelopmental and behavioral endpoints.
- Analyze Neu5Gc presence and immune reactivity in cohorts with **early-onset Alzheimer's or cardiovascular disease**.

#### Seed Oil–Focused Research:

- Fund studies examining the effects of **high-linoleic seed oil consumption** (e.g., soybean, corn) on **brain development, immune function, and gene expression**, particularly during prenatal and early life stages.
- Explore the role of **oxidized lipid byproducts** (e.g., 4-HNE, MDA) from linoleic acid in **neuroinflammation, mitochondrial dysfunction**, and **immune modulation**.
- Investigate dietary lipid profiles in ASD and Alzheimer's cohorts, comparing inflammatory and neurodevelopmental biomarkers.
- Examine the impact of seed oil consumption on **LDL oxidation**, endothelial inflammation, and **plaque formation** a well-established driver of atherosclerosis and cardiovascular disease.

While definitive causal proof may take time to establish, it is both scientifically responsible and ethically justified to encourage voluntary reduction of Neu5Gc-rich foods and omega-6-heavy industrial seed oils, particularly among pregnant women, breastfeeding mothers, and young children, as a precautionary measure. These changes are safe, **cost-neutral, and culturally adaptable**, and could be implemented without mandates while rigorous research proceeds.

You have a rare opportunity to investigate **root-cause-level dietary triggers** that are biologically sound, testable, and free from ideological or commercial agendas. Both **Neu5Gc and seed oil exposure** deserve serious consideration alongside other plausible environmental factors in the effort to understand and prevent autism, Alzheimer's, and cardiovascular disease.

Thank you for your leadership and your willingness to challenge assumptions in pursuit of the truth.

Respectfully,

Raymond Lutz Executive Director, CitizensOversight.org raylutz@citizensoversight.org

# Appendix: Supporting Scientific References on Neu5Gc, Seed Oils, and Immune-Driven Disease

# 1. Neu5Gc Incorporation and Chronic Inflammation

#### Varki A. et al., PNAS (2010)

**Title:** "Human-specific changes in sialic acid biology and the role of Neu5Gc in inflammation" **Key quote:** 

"Neu5Gc is metabolically incorporated into human tissues from dietary sources and becomes a xeno-autoantigen, leading to chronic inflammation via circulating anti-Neu5Gc antibodies — a process we have termed xenosialitis."

Link: https://www.pnas.org/doi/10.1073/pnas.1012833108

# 2. CMAH-Knockout Mouse Model of Human Neu5Gc Sensitivity

#### Samraj AN et al., PNAS (2015)

**Title:** "A red meat-derived glycan promotes inflammation and cancer progression" **Key quote:** 

"CMAH-deficient mice fed Neu5Gc and treated with anti-Neu5Gc antibodies developed chronic inflammation and enhanced tumor growth, mimicking the human immune conflict."

Link: https://www.pnas.org/doi/10.1073/pnas.1417508112

# 3. Anti-Neu5Gc Antibodies in All Humans

#### Nguyen DH et al., Glycobiology (2005)

**Title:** "Loss of Neu5Gc expression in humans correlates with increased anti-Neu5Gc IgG" **Key quote:** 

"Humans universally develop anti-Neu5Gc antibodies after early-life exposure to dietary Neu5Gc. These antibodies can bind to Neu5Gc-containing tissues, leading to immune activation."

Link: https://academic.oup.com/glycob/article/15/7/707/6298506

# 4. Maternal Immune Activation (MIA) and Autism

#### Choi GB et al., Science (2016)

**Title:** "The maternal interleukin-17a pathway in mice promotes autism-like phenotypes in offspring"

Key quote:

"Activation of maternal immune responses during pregnancy can directly alter fetal brain development. IL-17a signaling caused cortical and behavioral changes resembling ASD."

Link: https://www.science.org/doi/10.1126/science.aad0314

# 5. Sialic Acids in Brain Function and Neurodegeneration

#### Schnaar RL et al., Glycobiology (2014)

**Title:** "Sialic acids in the brain: gangliosides and polysialic acid in nervous system development, stability, and disease"

#### Key quote:

"Sialylated glycans play critical roles in synaptic plasticity, neuroprotection, and repair. Disruption of normal sialic acid composition can contribute to neurodegenerative disease."

#### **Clarification:**

In humans, the normal sialic acid is **Neu5Ac**. The incorporation of **Neu5Gc**, a non-human sialic acid found in red meat and cow dairy, may represent a disruptive alteration of normal neuronal glycosylation patterns. This aberrant incorporation could impair neurodevelopmental signaling and provoke immune responses in the brain — mechanisms that plausibly contribute to conditions such as autism.

Link: https://academic.oup.com/glycob/article/24/9/930/1725672

# 6. Postnatal Development of Anti-Neu5Gc Antibodies in Children

#### Taylor RE et al., Glycobiology (2010)

**Title:** "Detection of Neu5Gc in human infant tissues and development of anti-Neu5Gc antibodies"

Key quote:

"Dietary Neu5Gc is detectable in infants and young children, and anti-Neu5Gc antibodies appear early in life, suggesting exposure and immune priming during the postnatal period."

Link: https://academic.oup.com/glycob/article/20/10/1127/590190

### 7. Neu5Gc in Commercial Infant Formula

#### Kawanishi K et al., J Biol Chem (2011)

**Title:** "Detection of Neu5Gc in commercial dairy products including infant formula" **Key quote:** 

"Neu5Gc was detected in a range of dairy-derived products including infant formulas, indicating a direct source of exogenous sialic acid exposure during early life."

Link: https://www.jbc.org/article/S0021-9258(20)42071-9/fulltext

#### 8. Sialic Acids in Brain Development and Cognitive Function

#### Wang B., Nutr Rev (2009)

**Title:** "Sialic acid is an essential nutrient for brain development and cognition" **Key quote:** 

"Sialic acid is critical for neural transmission, synapse formation, and cognitive development. Disruptions in sialylation may impair neurodevelopmental processes."

Link: <u>https://academic.oup.com/nutritionreviews/article/67/9/631/1866592</u>

# 9. Neu5Gc Incorporation into Human Tissues Including Aging Organs

#### Tangvoranuntakul P et al., PNAS (2003)

**Title:** "Human uptake and incorporation of an immunogenic nonhuman dietary sialic acid" **Key quote:** 

"We detected Neu5Gc in multiple human tissues—including epithelial and endothelial linings—despite the human genetic inability to synthesize it. The presence of Neu5Gc in tissues with high turnover or chronic exposure suggests that dietary Neu5Gc can accumulate over time and contribute to inflammation in aging individuals."

#### **Relevance to Alzheimer's:**

Although the study does not focus on Alzheimer's disease directly, the detection of Neu5Gc in aging tissues combined with its known pro-inflammatory immune profile raises the possibility that lifelong dietary exposure may contribute to neuroinflammatory conditions, including Alzheimer's, especially through microglial activation and altered glycosylation patterns.

Link: https://www.pnas.org/doi/10.1073/pnas.2131556100

#### 10. Neu5Gc, Chronic Inflammation, and Atherosclerosis

#### Samraj AN et al., PNAS (2015)

**Title:** "A red meat-derived glycan promotes inflammation and cancer progression" **Key quote (from supplementary findings):** 

"CMAH-deficient mice developed increased atherosclerotic lesions when chronically exposed to dietary Neu5Gc and anti-Neu5Gc antibodies, implicating Neu5Gc-driven inflammation in vascular disease."

This study provides **direct experimental evidence** that Neu5Gc can accelerate **immune-mediated plaque formation**, supporting its role in heart disease.

Link: https://www.pnas.org/doi/10.1073/pnas.1417508112

# 11. Seed Oil Effects on Brain Gene Expression and Neuroendocrine Signaling

#### Deol P et al., Endocrinology (2020)

**Title:** *The Soybean Oil Diet Affects Brain Gene Expression in Mice* **Key quote:** 

"Soybean oil significantly dysregulated several genes involved in neuroendocrine signaling, including oxytocin and vasopressin pathways, and altered gene networks relevant to autism, neuroinflammation, and mitochondrial function."

#### **Relevance:**

This study provides direct experimental evidence that high-linoleic industrial seed oils, such as soybean oil, can **alter brain gene expression and neuroendocrine signaling** — including key regulators of social behavior, hormone balance, and mitochondrial energy metabolism. The affected pathways overlap with those implicated in **autism spectrum disorder (ASD)**. Importantly, the study also highlights how these effects may arise independently of obesity or caloric excess, suggesting that **the fatty acid profile itself is a driver of neural disruption**.

These findings support growing concerns that excessive omega-6 intake during development may contribute to the rise in **autism**, **learning disorders**, **and possibly Alzheimer's disease**, alongside other inflammatory triggers like **Neu5Gc**.

Link: https://academic.oup.com/endo/article/161/2/bqz044/5704212

# 12. Oxidized Linoleic Acid and Cardiovascular Risk

#### Ramsden CE et al., BMJ (2013)

**Title:** Use of dietary linoleic acid for secondary prevention of coronary heart disease and death: evaluation of recovered data from the Sydney Diet Heart Study and updated meta-analysis

**Key finding:** Replacing saturated fat with high-linoleic seed oils **increased mortality**, likely due to greater formation of oxidized LDL and related pro-atherogenic mechanisms.

Link: <u>https://www.bmj.com/content/346/bmj.e8707</u>