

Soyfoods Association of North America

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Comment to the Dietary Guidelines Advisory Committee

January 29, 2009

The Soyfoods Association of North America, which represents the interests of small and large soyfood manufacturers, processors, suppliers, farmers, and other industry stakeholders, appreciates the opportunity to comment on the development of the *2010 Dietary Guidelines for Americans* and urges the Committee to reference soyfoods more prominently in the final report.

Soyfoods are a healthy choice for all Americans. Soyfoods often contain significant amounts of key nutrients that Americans are advised to consume more of, and are low in nutrients that Americans should be consuming less of. For example, fortified soymilk, the most popular soy product consumed by Americans, is a “high” source of calcium and vitamin D and a “good source” of vitamin A, as defined by the FDA. It also provides protein, iron and potassium. Whole soybeans, or edamame, are “high” sources of fiber, magnesium, potassium, and calcium. In addition, soyfoods are cholesterol free and low in saturated fat and calories. Soyfoods fit into nearly every category of USDA’s *MyPyramid*—including milk, vegetables, meat and beans, grains, and oils—and can help Americans in meeting federal dietary recommendations.

Soyfoods contain high quality protein with all nine essential amino acids and can meet the needs of children and adults when consumed as the sole source of protein. According to the FDA protein quality determination method, soyfoods are the only plant-based protein equivalent to eggs and milk.¹ A 2007 evidence-based review² and a more recent clinical

¹ Food and Agricultural Organization of the United Nations. Protein quality evaluation. Report of Joint FAO/WHO Expert Consultation, No. 51. Rome, 1991. As cited in Code of Federal Regulations, CFR21 101.9(c)(7).

² Cope M, Erdman J, Allison D. “The potential role of soyfoods in weight and adiposity reduction: an evidence-based review.” *Obesity Reviews* 2007.

study³ find that soy protein is as good as other protein sources for promoting weight loss and that including soy in the diet is a strategy for weight management.

Soyfoods contribute to overall health for Americans throughout the lifecycle. In 1999, the FDA approved a health claim for soy protein and coronary heart disease. In 2008, four evidence-based reviews confirmed that soy protein lowers total and LDL cholesterol.^{4,5,6,7} The American Institute for Cancer Research's 2007 report found that a plant-based diet that includes soyfoods can help reduce the risk of developing cancer.⁸ More recently, clinical trials exploring the role of soy in protecting against breast cancer and prostate cancer have shown promise.

The American diet continues to broaden to include more culturally diverse and nutrient-rich foods. A variety of affordable soy products provide choices for Americans seeking more plant-based options because of cultural, religious, health, or medical reasons. A recently released *National Health Statistics Report* found nearly one in 200 American youths reported practicing a vegetarian diet.⁹ In 2008, 28 percent of Americans consumed soyfoods and more than a third consumed soy products at least a few times per week.¹⁰

We strongly recommend that the *2010 Dietary Guidelines* reflect the changing dietary preferences and needs of the American public. We urge the Committee to strongly consider featuring soyfoods more prominently in its recommendations for the *2010 Dietary Guidelines for Americans*. Thank you.

³ Lukaszuk J, Luebbegs P, Gordon B. "Preliminary Study: Soy Milk as effective as skim milk in promoting weight loss." *J Am Diet Assoc*. 2007;107:1811-1814.

⁴ McDonald A. "Effects of Soy Protein on Total Cholesterol and LDL-Cholesterol: Review of Published Studies 1998-2008." Radiant Development., May, 23, 2008. Submitted to FDA in response to the review of the soy protein health claim, FDA Docket No. 2007N-0464 on June 18, 2008.

⁵ Anderson J. "Soy Protein Effects on Serum Lipoproteins: A Quality Assessment and Weighted Analysis of Randomized, Controlled Studies." Submitted to FDA in response to the review of the soy protein health claim, FDA Docket No. 2007N-0464 on June 18, 2008.

⁶ Solae LLC. "Evidence-Based Review In Support of The Soy Protein & Coronary Heart Disease Health Claim." Submitted to FDA in response to the review of the soy protein health claim, FDA Docket No. 2007N-0464, June 5, 2008.

⁷ Harland JI and Haffner TA. "Does 25g soya protein reduce blood cholesterol: a systematic review and meta analysis". H-E-A-R-T UK 21st Annual Medical & Scientific Meeting 2007, 2007 June:27-29. Heriot-Watt University, Edinburgh, UK.

⁸ World Cancer Research Fund / American Institute for Cancer Research. *Food, Nutrition, Physical Activity, and the Prevention of Cancer: a Global Perspective*. Washington DC: AICR, 2007.

⁹ Barns, Patricia, et al. *Complementary and Alternative Medicine Use Among Adults and Children: United States, 2007*. U.S. Department of Health and Human Services, Center for Disease Control and Prevention and the National Center for Health Statistics. December 10, 2008. Accessed at: <http://www.cdc.gov/nchs/data/nhsr/nhsr012.pdf> on January 12, 2009.

¹⁰ Mintel International Group Limited. "Soy-based Food and Drink - US - December 2008: Executive Summary". *Mintel Oxygen*. December, 2008.