



July 14, 2011

**Comments to  
“Interagency Working Group on Food Marketed to Children:  
Preliminary Proposed Nutrition Principles to Guide Industry Self-Regulatory Efforts:  
FTC Project No. P094513**

The Soyfoods Association of North America (SANA), which represents the interests of small and large soyfood manufacturers, soy processors, suppliers, soybean farmers, and other industry stakeholders, appreciates the opportunity to comment to the Interagency Working Group on Food Marketed to Children (Working Group), comprised of representatives from the Federal Trade Commission (FTC), the Centers for Disease Control and Prevention (CDC), the Food and Drug Administration (FDA), and the United States Department of Agriculture (USDA) on the preliminary proposal for voluntary principles to guide industry self-regulatory efforts to improve the nutritional profile of foods marketed to children. SANA has some apprehension about these far-reaching principles. Despite their voluntary nature they could have a major impact on the economy without a clear understanding of the impact on children’s food choices and childhood obesity. In the case of the Interagency working group choosing to move forward, SANA urges the Working Group to ensure that ethnically diverse foods are included in the principles, especially those foods referenced in the 2010 Dietary Guidelines.

Soyfoods have been safely consumed for thousands of years by populations around the globe. The American diet continues to broaden to include more culturally relevant and nutrient rich foods. An increasing array of soyfoods provides numerous choices for Americans that seek 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.<sup>1</sup>

Soyfoods are a healthy choice for all Americans, and they fit into nearly every category of USDA’s *MyPlate* —including milk, vegetables, protein, and oils. Soyfoods often contain significant amounts of key nutrients that Americans are advised to consume more of, and they are cholesterol free and low in saturated fat and calories. For example, fortified soymilk, which is the most popular soy product consumed by Americans, is a “excellent source” of calcium and vitamin D and a “good source” of vitamin A, as defined by the Food and Drug Administration. It also provides protein, iron and potassium. According to the Dietary Guidelines and *MyPlate*, this beverage falls in the Dairy Group which should be how the Working Group classifies it under Principle A. Milk is listed in Table E-15 of the Dietary Guidelines Advisory Committee Report as the third largest source of saturated fat and in Table E-18 as the fifth largest source of cholesterol in the diets of U.S. adults. Although milk is a great source of many nutrients, with the prevalence of cardiovascular disease among U.S. adults and children, it may be prudent to highlight fortified soymilk as a healthy food from the dairy group to market to children.

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<sup>1</sup> 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.



There is a vast array of soyfoods that serve as meat alternatives in the Protein Group. The Dietary Guidelines and MyPlate included processed soy products such as tofu, soy-based burgers, sausages, strips, crumbles, and soy yogurts along with meats, legumes, nuts and seeds. Whole soybeans and edamame are “high” sources of fiber, magnesium, potassium, and calcium and would fit into the Vegetable Group or the Protein Group. A growing number of children are enjoying soyfoods in their homes as well as through the National School Lunch and Breakfast Programs.

Soyfoods are the only plant-based foods that contain all nine essential amino acids and provide complete protein equivalent to the protein quality of eggs and milk, according to the FDA protein quality determination method.<sup>2</sup> Soyfoods can meet the protein needs of children and adults when consumed as the sole source of protein and are high in fiber, a moderate source of energy, cholesterol free and very low in saturated fats. For Principle B, the Working Group can incorporate the guidance of the National Heart, Lung, and Blood Institute that provides information replacing high-fat meats with lower-fat soy-based meat alternatives ([http://www.nhlbi.nih.gov/health/public/heart/obesity/lose\\_wt/lcal\\_fat.htm](http://www.nhlbi.nih.gov/health/public/heart/obesity/lose_wt/lcal_fat.htm)).

In keeping with the Dietary Guidelines and MyPlate, the Soyfoods Association of North America urges the Working Group to develop principles for Marketing Food to Children and Adolescents that reflect the changing dietary preferences and needs of the broad American public. In 2008, 28 percent of Americans consumed soyfoods and more than a third consumed soy products at least a few times per week, according to Mintel.<sup>3</sup>

Thank you for accepting these comments. The Soyfoods Association of North America looks forward to working with you to finalize these guiding principles.

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<sup>2</sup> 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).

<sup>3</sup> Mintel International Group Limited. “Soy-based Food and Drink - US - December 2008: Executive Summary”. *Mintel Oxygen*. December, 2008.