Subject: National Toxicology Program

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From: Brandon LaGreca

To: "Shelby, Michael (NIH/NIEHS) [E]" <shelby@niehs.nih.gov>

Conversation: National Toxicology Program

Dr. Michael D. Shelby, CERHE Director NIEHS PO Box 12233 MD EC-32 Research Triangle Park, ND 27709

Dear Dr. Shelby:

I am writing to comment on the National Toxicology Program's draft reports on Genistein and Soy Formula.

As a health care provider, I am deeply concerned about the expert panel's conclusion that soy infant formula should be considered "safe until proven otherwise." Although the panel raises valid questions about the quality of many of the studies they examined, the failure of researchers to prove absolute danger does not prove safety, and many studies indicate that safety must not be assumed. Over the years, expert independent scientists — including leading toxicologists from the FDA's and NIEHS's own laboratories — have expressed serious concerns about the effect of soy phytoestrogens on brain, thyroid and reproductive development. We need to take their conclusions seriously.

I believe the United States should follow the examples of the Israeli Health Ministry and British Dietetic Association to warn parents and pediatricians about the potential dangers of soy infant formula. NIEHS should recommend that babies not receive soy infant formula except as a last resort. Better yet, we should also follow the example of the French Food Agency, which will soon require manufacturers to remove almost all the isoflavones from soy infant formula. These actions would help protect our babies.

I hope this letter will encourage the panel to reconsider its conclusions and to commit to the precautionary principle of "better safe than sorry." Thank you,

Brandon LaGreca, LAc

