

Soy Information Service

1868 Whangarei Heads Rd
R D 4, Whangarei,
New Zealand
<<http://www.soyonlineservice.co.nz>>

Ph 64-9- 4340564
Fx: 64- 9-4340567
www.soyonlineservice.co.nz

September 7 2006

Dr Michael Shelby,
CERHR Director, NIEHS, PO Box 12233,
MD EC-32,
Research Triangle Park. NC 27709,
USA

Comments on the NTP-CERHR Panel Reports on Reproductive and Developmental Toxicity of Genistein in Soy Infant Formulas

-

Dear Dr Shelby,

We have studied your file. We see a plethora of incorrect information which has been submitted by industry interests. Several rely on the phone survey done by Dr Brian Strom and his colleagues, which has been heavily criticized in a number of peer-reviewed and published papers. The Strom research was, for instance, examined by expert panels in the UK and discounted.....specifically disregarded in fact.

Our submission is that several expert Governmental Committees in the UK (eg Committee on Toxicity in Foods and the Environment; Scientific Advisory Committee, Nutrition. SACN) have examined all the evidence, and more, before you and have arrived at these findings

(a) SACN Refs. PEG/2002/01 and PEG/2002/02

- 1 "Strom et al (2001) and Sharpe et al (2002) raise significant concerns"
- 2 "the use of soy-based infant formulas is of concern. There is clear evidence of potential risk"
- 3 "There must be an onus on industry to better inform the general public, and, through a health professional, parents actually using these products to feed their infants

(b) As a result, the United Kingdom's Chief Medical Officer of Health in his January 2004 monthly newsletter to all health professionals in the UK wrote, inter alia, "**Health Policy Advice: Advice Issued on Soya-based Infant Formulas**" "Soy based infant formulas have a high phytoestrogen content which could pose a risk to the long-term reproductive health of infants".

Additionally, the US Academy of Sciences has published a text-book for the guidance of regulators called "Hormonally Active Agents in the Environment" That states unequivocally that

the phytoestrogen content of soy infant formulas is “in the range known to cause thyroid harm”

We at Soy Information Service believe that specific health risks of phytoestrogens, (principally genistein) in soy formulas to infants have been authoritatively identified by the best expert committees on both sides of the Atlantic, and that health professionals and parents should be so informed

Yours Sincerely,

Soy Information Service peer

Richard F James, Director