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February 14, 2018

Mr. John Sheehan
Director, Subsistence Customer Operations & Chairman, Joint Subsistence Policy Board
DLA Troop Support
700 Robbins Avenue
Philadelphia, PA 19111-5096
Via email to: IngredientsRFI@dla.mil

Dear Mr. Sheehan:

On behalf of the American Soybean Association (ASA), I am writing to comment on the Defense Logistics Agency's "RFI to industry to assess the impact of reducing or eliminating certain ingredients from food products." The American Soybean Association (ASA) represents all U.S. soybean farmers on domestic and international policy issues important to the soybean industry. ASA has 26 affiliated state associations representing 30 soybean producing states and more than 300,000 soybean farmers.

We were surprised by the Defense Logistics Agency's (DLA) notice that proposed to prohibit a number of soy foods from military dining: Textured Vegetable Protein (TVP), Isolated Soybean Protein (ISP), Soy Protein Concentrate (SPC), and Vegetable Protein Product (VPP) when used as meat protein extenders. Soy is an important component of the American diet, providing high-quality protein that lowers blood cholesterol. Food service providers have, for many years, been utilizing soy ingredients to lower saturated fat, cholesterol and calories. The implication that soy is used as a filler for meat protein is simply incorrect.

Before requiring food companies to remove healthful, functional, and cost-effective soy protein from their products, we trust that the DLA would carefully consider the best science, including government sources. The Dietary Guidelines for Americans process includes an extensive review of the best available scientific literature. We have not seen any evidence of the resources and guidance that were used to develop this prohibition.

ASA would like to associate our comments with those provided by the Soyfoods Association of North America (SANA), of which ASA is a member. SANA's comments point out that removing soy protein ingredients would "increase the fat and calorie content of the products while reducing the nutritional quality of the finished foods." We urge the DLA to adopt SANA's recommendations that the Department of Defense align its standards with existing U.S government policy in the Dietary Guidelines. We also hope the DLA will accept SANA's invitation for a taste demonstration of meat products containing soy ingredients and would be happy to help sponsor such an event.

Thank you for your consideration.

Sincerely yours,

A handwritten signature in black ink that reads "John Heisdorffer". The signature is written in a cursive, flowing style.

John Heisdorffer
President