



17 September 2020

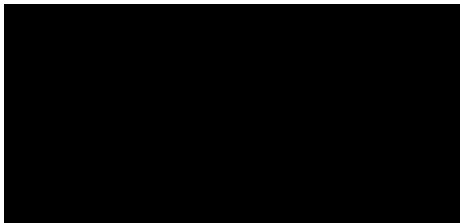
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the 2nd Call for submissions – Application A1186: Soy leghemoglobin in meat analogue products.

Yours sincerely



Chief Executive



***2nd Call for submissions – Application
A1186: Soy leghemoglobin in meat
analogue products***

**Submission by the New Zealand Food & Grocery
Council**

17 September 2020

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the **2nd Call for submissions – Application A1186: Soy leghemoglobin in meat analogue products.**
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$40 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$34 billion in export revenue from exports to 195 countries – representing 65% of total good and services exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 45% of total manufacturing income. Our members directly or indirectly employ more than 493,000 people – one in five of the workforce.

The Application

3. Impossible Foods Inc commercialised the Impossible™ Burger in 2016. The burger was subsequently served on Air New Zealand flights from Los Angeles to Auckland. Impossible Foods now wants the soy leghemoglobin (used in the LegH Prep which in turn is used in the Impossible™ Burger) to be included in the Food Standards Code so that it might be added to other meat analogue products to provide nutrition (such as iron), flavour and aroma of the traditional animal derived counterpart. The intention is that soy leghemoglobin would be used at levels up to 0.8% weight for weight in raw product.

OVERARCHING COMMENTS

4. NZFGC continues to support the inclusion of soy leghemoglobin in the Food Standards Code. We note that the submissions received to the 1st Call for Submissions did not provide any substantive scientific evidence or new arguments that would change the conclusions of FSANZ’s evaluation of the safety of soy leghemoglobin in the form of LegH Prep and that, as a result, FSANZ is maintaining its position that LegH Prep is safe for human consumption in meat analogue products at levels up to 0.8% based on the previous key findings from the risk and technical assessment.
5. In terms of identifying levels of soy leghemoglobin in foods, manufacturers would need to hold documentation that validated the amount of LegH Prep added to meat analogue products. This commercial-in-confidence documentation would need to be available to enforcement agencies should the need arise.
6. NZFGC is aware that the generic labelling provisions in Standard 1.2.4 of the Food Standards Code will apply. Additionally, since novel DNA and novel protein from GM *P. pastoris* will be present in the final food product from the LegH Prep ingredient, products containing LegH Prep will need to be labelled as GM at retail and relevant information must be available on request from a consumer by a food business supplying food for immediate consumption (fast food) or by a caterer.
7. Internationally, while the 1st CFS reported that Legh Prep had been approved in the US, Canada, Singapore and Hong Kong/Macau, approval in the EU continues to be pending. There continue to be no reported adverse effects from consumption. We note the safety assessments of these countries have supported the FSANZ conclusion in relation to the safety assessment.
8. We note comments on the 1st CFS suggested that products containing LegH Prep could be substantially higher in sodium than meat products delivering the same iron. While this may be the case for some products, the nutrition Information panel should make

comparison clear to the consumer and the variation for other nutrients, including sodium, evident.

9. The 2nd CFS includes updated information from the applicant that around 100 million quarter-pound servings of meat analogue products containing soy leghemoglobin had now been sold. Post market surveillance identified one complaint per 600,000 servings but none of these complaints had been confirmed as an adverse event due to consumption of the products. We note that in an environment of heightened demand for non-animal products, soy leghemoglobin has a role to play that can complement other products on the market to meet demand.
10. NZFGC supports the draft variation as prepared by FSANZ and for the amendment to proceed.