

**From:** [Sharon Ayres](#)  
**To:** 9(2)(a)  
**Subject:** Impossible Beef labelling query  
**Date:** Friday, 13 May 2022 3:30:00 pm  
**Attachments:** [image001.png](#)  
[image002.png](#)

Good afternoon 9(2)(a),  
New Zealand Food Safety (NZFS) Food Compliance Services has received a query regarding the labelling of an Impossible Beef product. Please see photos attached that were supplied to us.  
The labelling in the photos provided do not comply with the [Australia New Zealand Food Standards Code](#) regarding food produced using gene technology.

Could you please provide the following information:

- Are these photo of NZ-market product?
- Copies or photos of labels for NZ-market variants you distribute.
- A copy of the ingredients/specification/label that is provided with product that goes to food service (e.g. Hell Pizza).



# ALL FLAVOR. NO COW.

Burgers, tacos, lasagna...use like **ground beef** in your favorite recipes!

Make the Impossible Burger at home:

**Pre-heat pan** to MEDIUM-HIGH, or **grill** to HIGH heat.

**Cook a 1/4 lb. patty 5-6 min**, flip halfway through.

**Cook to taste.** Fully cooked when interior is 160°F.

For more recipes & tips visit [ImpossibleFoods.com/recipes](http://ImpossibleFoods.com/recipes)



Nutrition Facts	Amount/serving		%DV			
3 servings per container	<b>Total Fat</b>	14g	<b>18%</b>	<b>Total Carb.</b>	9g	<b>3%</b>
	Saturated Fat	8g	<b>40%</b>	Dietary Fiber	3g	<b>11%</b>
	<i>Trans</i> Fat	0g		Total Sugars	<1g	
Serving size 4oz. (113g)	<b>Cholesterol</b>	0mg	<b>0%</b>	Incl. <1g Added Sugars	1g	<b>1%</b>
	<b>Sodium</b>	370mg	<b>16%</b>	<b>Protein</b>	19g	<b>31%</b>
Calories per serving <b>240</b>	Vitamin D 0mcg 0% • Calcium 170mg 15% • Iron 4.2mg 25%					
	Potassium 610mg 15% • Thiamin 2350% • Riboflavin 15%					
	Niacin 50% • Vitamin B6 20% • Folate 30%					
	Vitamin B12 130% • Phosphorus 15% • Zinc 50%					



**INGREDIENTS:** WATER, SOY PROTEIN CONCENTRATE, COCONUT OIL, SUNFLOWER OIL, NATURAL FLAVORS, 2% OR LESS OF: POTATO PROTEIN, METHYLCELLULOSE, YEAST EXTRACT, CULTURED DEXTROSE, FOOD STARCH MODIFIED, SOY LEGHEMOGLOBIN, SALT, SOY PROTEIN ISOLATE, MIXED TOCOPHEROLS (VITAMIN E), ZINC GLUCONATE, THIAMINE HYDROCHLORIDE (VITAMIN B1), SODIUM ASCORBATE (VITAMIN C), NIACIN, PYRIDOXINE HYDROCHLORIDE (VITAMIN B6), RIBOFLAVIN (VITAMIN B2), VITAMIN B12

**CONTAINS: SOY GLUTEN FREE**

Manufactured by: Impossible Foods Inc. 400 Saginaw Dr. Redwood City, CA 94063 Hello@ImpossibleFoods.com

KEEP REFRIGERATED. IF PURCHASED FROZEN, THAW IN REFRIGERATOR AND USE SEALED WITHIN 10 DAYS.

20-00041R3



Kind regards,  
Sharon

Sharon Ayres ([she/her](mailto:shay@mpi.govt.nz)) | Senior Food Compliance Officer, Food Compliance Services  
Food Compliance & Response | New Zealand Food Safety - Haumaru Kai Aotearoa  
Ministry for Primary Industries - Manatū Ahu Matua | 11 Nikau Crescent, Mount Maunganui 3116 | Private Bag 12031, Tauranga Mail Centre 3143 | New Zealand  
Mobile: **9(2)(a)** | DDI: **9(2)(a)** | [sharon.ayres@mpi.govt.nz](mailto:sharon.ayres@mpi.govt.nz) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)

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[Subscribe to food recall updates](#)

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**From:** 9(2)(a)  
**To:** Sharon Ayres  
**Cc:** 9(2)(a)  
**Subject:** Re: FW: Impossible Beef labelling query  
**Date:** Monday, 16 May 2022 4:21:57 pm  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[Impossible\\_FS\\_SellSheet\\_Brick\\_Patty\\_8.5x11\\_ANZ\\_100121\(1\)\(1\).pdf](#)  
[ImpossibleFoods\\_ProductInfoSheet\\_65-00111\(2 x 113 g Impossible Burger Patties for AUS\\_NZ Retail\)\(1\).pdf](#)

Kia ora Sharon,

Trust this finds you well.

I'm happy to coordinate any queries you have.

If this query is in response to any claims from GE Free NZ - we helped clarify areas last week and there's a link to the Food Ticker article here for reference: <https://www.foodticker.co.nz/impossible-foods-rejects-complaint/>.

For our Retail 113g Beef Made From Plants patties currently available in Countdown nationwide, please see attached spec list and link to photo here:

- <https://www.countdown.co.nz/shop/productdetails?stockcode=198284&name=impossible-plant-based-burger-patties>

For our Foodservice 2.3kg Beef Made From Plants bricks currently available in Hells, BP and other foodservice partners, please see link to photo here and spec sheet attached:

ANZ 5lb Brick Renders

9(2)(b)(ii)

Please let me know if you have any questions. Those images supplied below do not match what is currently available in New Zealand via IFD.

Ngā mihi nui,

9(2)(a)  
9(2)(a)

--  
9(2)(a)  
He / Him  
NZ lead, Consultant  
9(2)(a)



On Fri, May 13, 2022 at 1:32 PM 9(2)(a) > wrote:

**From:** Sharon Ayres <[Sharon.Ayres@mpi.govt.nz](mailto:Sharon.Ayres@mpi.govt.nz)>  
**Sent:** Friday, 13 May 2022 3:31 pm  
**To:** 9(2)(a)  
**Subject:** Impossible Beef labelling query

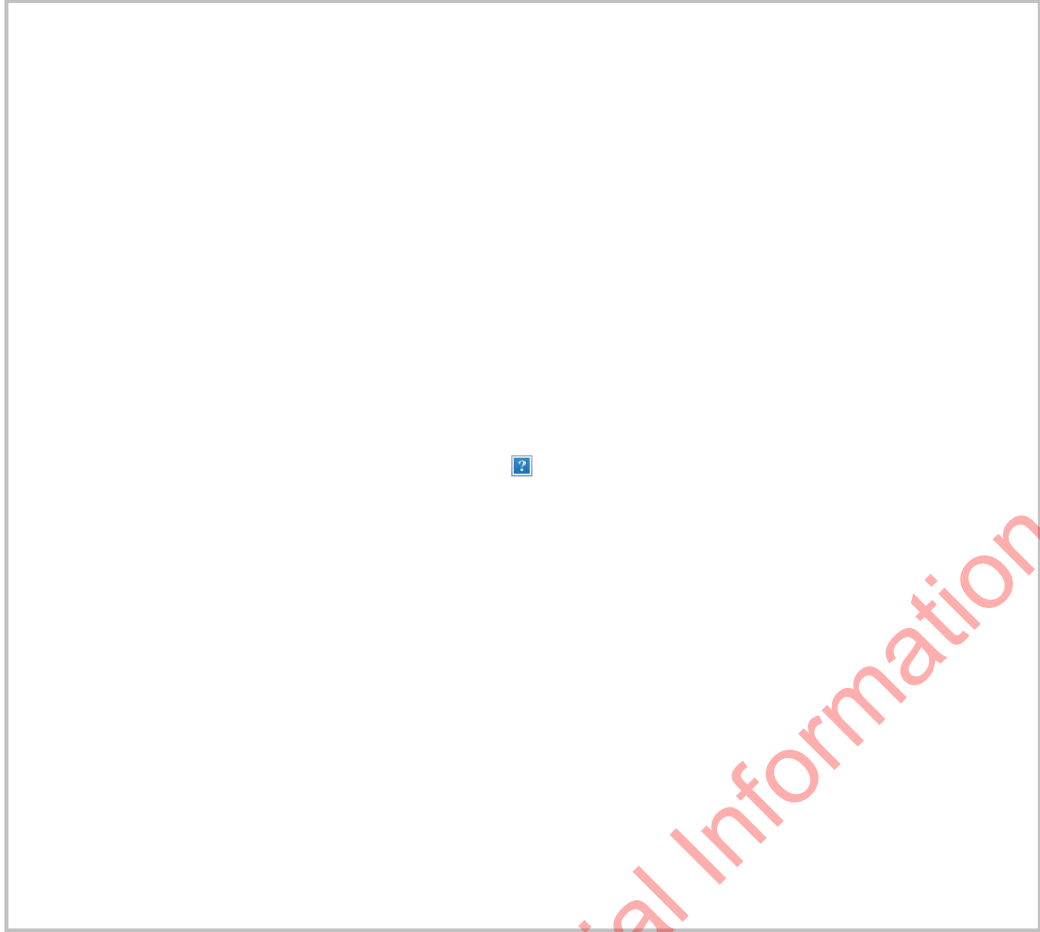
Good afternoon 9(2)(a),

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Kind regards,

Sharon

Sharon Ayres ([she/her](#)) | Senior Food Compliance Officer, Food Compliance Services

Food Compliance & Response | New Zealand Food Safety - Haumaru Kai Aotearoa

Ministry for Primary Industries - Manatū Ahu Matua | 11 Nikau Crescent, Mount Maunganui 3116 | Private Bag 12031, Tauranga Mail Centre 3143 | New Zealand

Mobile: [9\(2\)\(a\)](#) | DDI: [+9\(2\)\(a\)](#) | [sharon.ayres@mpi.govt.nz](mailto:sharon.ayres@mpi.govt.nz) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)

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# IMPOSSIBLE™

## PRODUCT INFORMATION SHEET

<b>ITEM DESCRIPTION:</b>	<b>Impossible Burger Patties Made From Plants [12 Units of 226 g Trays (2 x 113 g Patties)] for Australia/New Zealand Retail</b>		
<b>ITEM NUMBER</b>	65-00111	<b>EFFECTIVE DATE</b>	8/20/2021
<b>OUTER CASE GTIN</b>	11220000340012	<b>LAST MODIFIED</b>	8/20/2021
<b>INNER PACK UNIT UPC</b>	1220000340015		
<b>OUTER CASE, PACK SIZE</b>	12 x 226 g		
<b>INNER PACK SIZE</b>	226 g (2 x 113 g Patties)		

<b>CASE/PALLET INFORMATION (GMA Heat Treated Pallet)</b>	
<b>Case Dimensions (LxWxH)</b>	46.36 x 26.04 x 11.43 cm
<b>Case Cube</b>	0.0138 m <sup>3</sup>
<b>Case Net Weight</b>	2.72 kg
<b>Case Gross Weight</b>	3.53 kg
<b>TI x HI = Cases/Pallet</b>	9 x 9 = 81
<b>Pallet Dimensions (LxWxH)</b>	121.9 x 101.6 x 115.82 cm
<b>Pallet Net Weight</b>	220 kg
<b>Pallet Gross Weight (w/ pallet)</b>	308 kg
<b>Pallet Cube</b>	1.43 m <sup>3</sup>

<b>SHIPPING &amp; STORAGE CONDITIONS</b>	
Frozen (-23.3°C to -17.8°C); Double Stack OK	

<b>SHELF LIFE</b>	
<b>Frozen (from manufacture)</b>	6 months / 180 days
<b>Refrigerated (once thawed)</b>	10 days

<b>COUNTRY OF ORIGIN</b>	United States
--------------------------	---------------

<b>CLAIMS</b>	
<b>Gluten Free</b>	Yes
<b>Organic</b>	No
<b>Kosher</b>	Yes
<b>Halal</b>	Yes

<b>LOT CODE EXPLANATION</b>
Manufacturing site (3 letters) Year (2 digits) Julian Date (3 digits) OZ Line number (2 digits) Time Stamp (4 digits with colon) Equipment type (1 letter)
EX: GWEYYXXX0Z HH:MM A

<b>ALLERGEN LIST</b>
Soy

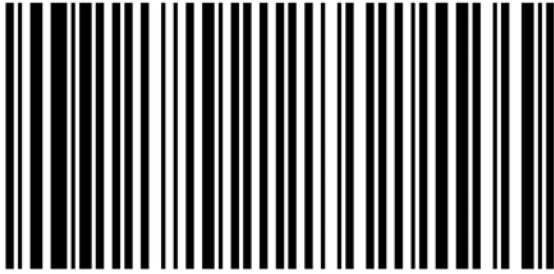
<b>TYPICAL NUTRITION PER 100g</b>	
<b>Calories (kcal)</b>	202
<b>Protein (g)</b>	16.7
<b>Total Fat (g)</b>	11.4
<b>Saturated Fat (g)</b>	5.2
<b>Trans Fat (g)</b>	0
<b>Total Carbohydrate (g)</b>	8.2
<b>Total Sugar (g)</b>	0.6
<b>Dietary Fibre (g)</b>	4.8
<b>Cholesterol (mg)</b>	0
<b>Sodium (mg)</b>	325
<b>Potassium (mg)</b>	591
<b>Calcium (mg)</b>	155.1
<b>Iron (mg)</b>	3.5
<b>Thiamin (Vitamin B1)</b>	0.16
<b>Riboflavin (mg)</b>	0.16
<b>Niacin (mg)</b>	5.0
<b>Vitamin B6 (mg)</b>	0.3
<b>Vitamin B12 (µg)</b>	2.0
<b>Phosphorus (mg)</b>	170.9
<b>Zinc (mg)</b>	4.4

<b>INGREDIENT STATEMENT</b>
<b>Ingredients:</b> Water, Plant Protein (21%) (Soy), Sunflower Oil, Coconut Oil, Thickener (INS 461), Glutamic Acid, Natural Flavours, Cultured Dextrose, Modified Starch, Yeast Extract, Soy Leghemoglobin (genetically modified), Salt, Antioxidant (INS 307b), Vitamins and Minerals (Zinc Gluconate, Niacin (Vitamin B3), Thiamine Hydrochloride (Vitamin B1), Pyridoxine Hydrochloride (Vitamin B6), Riboflavin (Vitamin B2), Vitamin B12).
<b>Contains: Soy</b>
<b>Product contains an allium derivative</b>

# IMPOSSIBLE™

## PRODUCT INFORMATION SHEET

### OUTER CASE GTIN BARCODE (GS1-128)



(01)1122000340012

### INNER PACK UPC BARCODE (EAN-13)



1 220000 340015

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# IMPOSSIBLE™

# PUT ME ON YOUR MENU



**BOOST  
TRAFFIC**



**ATTRACT NEW  
CUSTOMERS**



**IMPROVE SAME  
STORE SALES**

## MEAT ON A MISSION

People love meat. After all, it's delicious and they want to keep eating it. But they're looking for a better way. So we made Impossible™ Beef Made From Plants: meat made from plants, for people who love beef mince. Delicious and better for the planet.

Every pound of Impossible Beef Made From Plants (instead of beef mince from cows) uses:



**LESS  
WATER**



**LESS GREENHOUSE  
GAS EMISSIONS**



**LESS  
LAND**

## ANY WAY YOU WANT IT

Spiced, sauced, braised, grilled, you name it — if you know how to cook beef mince, you know how to cook Impossible Beef Made From Plants.

[ImpossibleFoods.com/Sell-Impossible](https://ImpossibleFoods.com/Sell-Impossible)



**MADE  
FROM  
PLANTS**

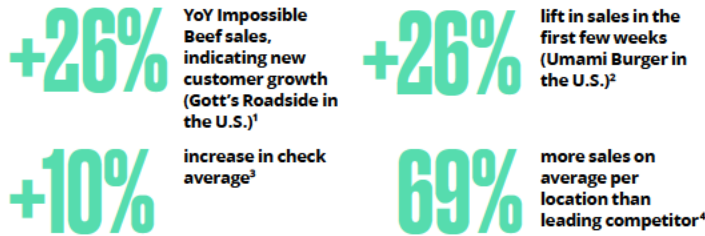
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## GOOD FOR YOUR BUSINESS

Putting Impossible™ products on your menu can drive your sales revenue, foot traffic and brand perception.

Customers have experienced:



We're here to help. Whether it's training, guidelines, or marketing materials — our team has you covered.

To see what we offer, check out:

[ImpossibleFoods.com/Foodservice](https://ImpossibleFoods.com/Foodservice).

## MADE FOR EVERYONE

92% of Impossible Foods consumers in the US eat meat from animals.<sup>5</sup>

## THE IMPOSSIBLE FOODS DIFFERENCE

Delicious, mouthwatering meat with the sizzle and taste you love — made from plants. It's packed with 18.8 g of protein per 113g serving and is a good source of iron and fibre — but contains no animal hormones or antibiotics. It's also made with far fewer natural resources. Impossible Beef Made From Plants: better for the planet, good for your business.

## SERVE IMPOSSIBLE FOODS

Request a sample from your rep.

Place an order with your distributor.

Reach out through [ImpossibleFoods.com/Sell-Impossible](https://ImpossibleFoods.com/Sell-Impossible).

Item Codes	Description	Pack Size
60-00029	Impossible Beef Made From Plants 2.3kg Brick	4 x 2.3kg bricks
60-00030	Impossible Burger Patties Made From Plants, 113g Patties	4 x 10 113g patties

## NUTRITION INFORMATION

### Impossible Beef Made From Plants 2.3kg Brick

NUTRITION INFORMATION			
Servings Per Package: 20			
Serving Size: 113 g			
	Average Quantity Per Serving	% Daily Intake* (Per Serving)	Average Quantity Per 100 g
Energy	953 kJ (228 kcal)	11%	843 kJ (202 kcal)
Protein	18.8 g	38%	16.7 g
Fat, Total	12.8 g	18%	11.4 g
- Saturated	5.9 g	25%	5.2 g
Carbohydrate	9.2 g	3%	8.2 g
- Sugars	0.7 g	1%	0.6 g
Dietary Fibre	5.4 g	18%	4.8 g
Sodium	367 mg	16%	325 mg
Potassium	668 mg		591 mg
% RDI (Per Serving) <sup>†</sup>			
Calcium	175.3 mg	22%	155.1 mg
Iron	4.0 mg	30%	3.5 mg
Thiamin (Vitamin B1)	0.18 mg	15%	0.16 mg
Riboflavin (Vitamin B2)	0.18 mg	12%	0.16 mg
Niacin	5.7 mg	50%	5.0 mg
Vitamin B6	0.34 mg	19%	0.3 mg
Vitamin B12	2.3 µg	100%	2.0 µg
Phosphorus	193.1 mg	19%	170.9 mg
Zinc	5.0 mg	35%	4.4 mg

\*Percentage of daily intakes are based on an average adult diet of 8700 kJ  
<sup>†</sup>Percentage recommended dietary intake (AU/NZ)

**Ingredients:** Water, Soy Protein Concentrate, Sunflower Oil, Coconut Oil, Thickener (INS 461), Glutamic Acid, Natural Flavours, Cultured Dextrose, Modified Starch, Yeast Extract, Soy Leghemoglobin (genetically modified), Salt, Antioxidant (INS 307b), Soy Protein Isolate, Vitamins and Minerals (Zinc Gluconate, Niacin (Vitamin B3), Thiamine Hydrochloride (Vitamin B1), Pyridoxine Hydrochloride (Vitamin B6), Riboflavin (Vitamin B2), Vitamin B12)  
**Contains: Soy**

### Impossible Burger Patties Made From Plants, 113g Patties

NUTRITION INFORMATION			
Servings Per Package: 10			
Serving Size: 113 g (1 patty)			
	Average Quantity Per Serving	% Daily Intake* (Per Serving)	Average Quantity Per 100 g
Energy	953 kJ (228 cal)	11%	843 kJ (202 cal)
Protein	18.8 g	38%	16.7 g
Fat, Total	12.8 g	18%	11.4 g
- Saturated	5.9 g	25%	5.2 g
Carbohydrate	9.2 g	3%	8.2 g
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\*Percentage of daily intakes are based on an average adult diet of 8700 kJ  
<sup>†</sup>Percentage recommended dietary intake (AU/NZ)



1. Source: Gott's Roadside in the U.S. 2. Source: Umami Burger in the U.S. 3. Source: Business Insider 2019  
 4. Source: NPDI Supply Track, February 2020 5. June 2021 Brand Tracker, n=1512

**From:** 9(2)(a)  
**To:** [Sharon Ayres](#)  
**Cc:** 9(2)(a)  
**Subject:** RE: Impossible Beef labelling query  
**Date:** Thursday, 19 May 2022 2:23:13 pm  
**Attachments:** [158125\\_210619155\\_Redacted.pdf](#)

This attachment is withheld pursuant to 9(2)(b)(ii) of the OIA

Hi Sharon,

The soy protein that we get is from a Non-GMO Identity Preservation (IP) program (program details available upon request). Each lot that we get from our supplier comes with a PCR analysis for soy traits (see attached example; please note certain information, such as our supplier and ingredient trade name have been redacted since we consider this confidential information). If you need to see an unredacted version, please let me know. I would need assurance that the unredacted information provided would be held in confidence and not disclosed to any persons outside your agency.

If you have any further questions on this matter, please feel free to reach out to me directly.

Regards,  
9(2)(a)

----- Forwarded message -----

**From:** Sharon Ayres <[Sharon.Ayres@mpi.govt.nz](mailto:Sharon.Ayres@mpi.govt.nz)>  
**Date:** Wed, 18 May 2022 at 10:56 AM  
**Subject:** RE: FW: Impossible Beef labelling query  
**To:** 9(2)(a)  
**Cc:** 9(2)(a)

Good afternoon 9(2)(a),

Thanks very much for that information.

In addition, do you have an assurance or similar from your supplier that could be provided as evidence that the soy protein is not genetically engineered?

Kind regards,

Sharon

Sharon Ayres ([she/her](#)) | Senior Food Compliance Officer, Food Compliance Services

Food Compliance & Response | New Zealand Food Safety - Haumaru Kai Aotearoa

Ministry for Primary Industries - Manatū Ahu Matua | [11 Nikau Crescent, Mount Maunganui](#) 3116 | Private Bag 12031, Tauranga Mail Centre 3143 | New Zealand

Mobile: +9(2)(a) | DDI: +9(2)(a) | [sharon.ayres@mpi.govt.nz](mailto:sharon.ayres@mpi.govt.nz) | Web: [www.mpi.govt.nz](http://www.mpi.govt.nz)

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9(2)(a)

She / Her / Hers

Director, Regulatory Affairs



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