



GE Free New Zealand

In Food And Environment Inc.

PO Box 13402, Wellington, NZ

Tel: 027 479 4195

6 May 2022

Re: Recall Impossible Burger under the FSANZ Standards Code 1.5.2.

Tēnā koe,

We would like to raise a complaint on the omission of GM/GE labelling on major ingredients in the Impossible Food Burger range. We would like this product to be recalled from sale and correctly labelled.

The Impossible foods [website](#)ⁱ declare their two main ingredients are genetically engineered. They state –

“We use two key genetically engineered ingredients: heme (soy leghemoglobin) -- the “magic” molecule that makes certain meats taste so meaty -- and soy protein.”

This raises concerns over the absence of the labelling of the GE “soy protein concentrate” ingredient and consumers being provided the right information about the Impossible burger product to meet the rules of the Standards 1.5.2 code, Fair Trading Act and Weight and Measures Act 1987.

We note that both soy varieties and soy haemoglobin have been approved by [FSANZ](#)ⁱⁱ for entry into the Food Chain.

Labelling of food produced from Gene Technology

MPI clearly states in their [“Guide to Retail Food Labelling”](#)ⁱⁱⁱ what and how GM sourced foods are to be labelled. It states

Irradiated and genetically modified food:

“If any part of your food has been irradiated or genetically modified you must state this” (p.7).

What must be Provided

Listed GM Foods: “Information can accompany food OR be displayed with the food”(p.12)

The Food Standards Australia New Zealand Code – [Standard 1.5.2](#)^{iv} **Food Produced from Gene Technology (GM)** sets the legislative requirements for labelling of GM foods.

The 1.5.2 Standards code is Australia New Zealand the Food Standards Code that both countries abide by.

The 1.5.2 Standards code clearly states that all food that contains a **genetically modified food ingredient** must be labelled.

The Standards 1.5.2 Code highlights that the Fair Trading Act applies to claims of non-GMO, but does not state this for non-disclosure of GMO source ingredients.

The intent of the code is to provide fair and honest information for consumer choice. As stated -

1.5.2– 2 Food produced using gene technology means a food, which has been derived or developed from an organism, which has been modified by gene technology.

1.5.2 - 4: Requirement to label food as ‘genetically modified’

(1) - This section applies to a food for sale that consists of, or has as an ingredient, food that is a genetically modified food.

1.5.2-4 (5) - genetically modified food means a *food produced using gene technology that

(a) Contains novel DNA or novel protein; or

(b) Is listed in Section S26—3 as subject to the condition that its labelling must comply with this section.

In the last few months there has been widespread advertising of the Impossible Foods products being sold in Pizza chains and Countdown supermarkets. However, there appears to be clear labelling on the back of the package on the GE soy heme but no reference to the main ingredient [“Soy protein”](#)^v concentrate” being labelled as “genetically modified”.

The website is advising that more Impossible Foods products; Pork, Chicken, meatballs and sausages are coming to New Zealand in the future. We expect these will be validated as using FSANZ approved GMO varieties and that they will have the appropriate labelling.^{vi}

The presence of novel DNA is almost certain in the product given the soy protein concentrate appears to be the major ingredient in all these products. The Impossible Burger has 19g of protein sourced from GM soy protein or 31% its daily value (DV).

Further, The Journal BioMedical published a study by [Ahsan F. et al \(2018\)](#).^{vii} They raise the possibility of the dangers of soy if eaten in excess of 25g/day. They report that though there are

health benefits of fermented soy there are some warnings associated with processed forms of soy foods. We quote –

“...a possible disruption of thyroid, hormonal and sexual function... digestive distress, malnutrition, immune system breakdown, cognitive decline, infertility and even cancer”.

If the product is unlabelled then the consumer also is unaware of the level of soy they are consuming in their diet and therefore might have adverse effects on their health. This needs to be clearly stated on the packet.

Hells Pizza outlets, when rung and asked, were unable to advise customers that the Gourmet Vegan [Impossible Burger pizza](#)^{viii} is made from GE soy.

It is mentioned by MPI as outlined earlier and FSANZ that, if a customer asks at a take away outlet they should be told or see a display informing them of a GMO product being used. This is clearly stated on the FSANZ website.

[Where will I find GM listed on the label?](#)^{ix}

You will find the statement ‘genetically modified’ on the label either next to the name of the food (e.g. ‘**genetically modified soy beans**’), or in association with the specific GM ingredient in the ingredient list (e.g. ‘**soy flour (genetically modified)**’). ***If the food is unpackaged, then the information must accompany or be displayed with the food.***

Summary

The omission in labelling of the majority ingredient GE soy in Impossible burger does not meet the requirements in the 1.5.2 Standards code.

The declared use of GE soy that contains novel DNA and protein in Impossible Burger triggers a requirement to label.

Non-disclosure is a breach of the code but also deliberately misleading and a serious breach of customer trust who are seeking truthful clear labelling on food ingredients sourced from gene technology.

We ask that MPI recall the Impossible Food products and ensure that they are properly labelled as containing genetically modified soy, as the FSANZ Standards Code 1.5.2 requires.

Nga mihi,

Jon Muller

Secretary GE Free NZ

References:



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



Nutrition Facts	Amount/serving		Amount/serving	
		%DV		%DV
3 servings per container	Total Fat 14g	18%	Total Carb. 9g	3%
	Saturated Fat 8g	40%	Dietary Fiber 3g	11%
	<i>Trans Fat</i> 0g		Total Sugars <1g	
Serving size 4oz. (113g)	Cholesterol 0mg	0%	Incl. <1g Added Sugars	1%
	Sodium 370mg	16%	Protein 19g	31%
Calories per serving 240	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



- i <https://faq.impossiblefoods.com/hc/en-us/articles/360023038894-Do-your-products-contain-genetically-modified-ingredients->
- ii <https://www.foodstandards.gov.au/consumer/gmfood/applications/Pages/default.aspx>
- iii <https://www.mpi.govt.nz/dmsdocument/2965-A-guide-to-food-labelling>
- iv <https://www.foodstandards.gov.au/code/Documents/1.5.2%20GM%20foods%20v157.pdf>
- v <https://impossiblefoods.com/nz-en/products/beef>
- vi <https://faq.impossiblefoods.com/hc/en-nz/articles/4412101810839-Do-you-have-any-other-products->
- vii <http://biomedres.us/pdfs/BJSTR.MS.ID.002239.pdf>
- viii <https://order.hellpizza.nz/menu/pizza>
- ix <https://www.foodstandards.gov.au/consumer/gmfood/labelling/Pages/default.aspx>