



AUSTRALIAN
**FOOD &
GROCERY**
COUNCIL

AFGC SUBMISSION

**2ND CALL FOR SUBMISSIONS - APPLICATION A1186
SOY LEGHEMOGLOBIN IN MEAT ANALOGUE PRODUCTS**

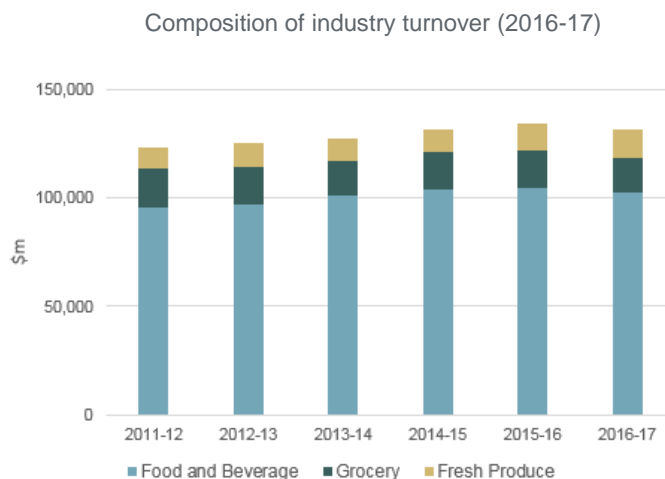
17 September 2020

Sustaining Australia

PREFACE

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry.

There are over 180 member companies, subsidiaries and associates who together comprise 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors.



With an annual turnover in the 2016-17 financial year of \$131.3 billion, Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity.

The diverse and sustainable industry is made up of over 36,086 businesses and accounts for over \$72.5 billion of the nation's international trade. These businesses range from some of the largest globally significant multinational companies to small and medium enterprises. Industry made \$2.9 billion in capital investment in 2016-17 on research and development.

Food, beverage and grocery manufacturing together forms Australia's largest manufacturing sector, representing 36 per cent of total manufacturing turnover in Australia.

The food and grocery manufacturing sector employs more than 324,450 Australians, representing almost 40 per cent of total manufacturing employment in Australia.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost 42 per cent of the total persons employed being in rural and regional Australia.

It is essential to the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

OVERVIEW

The Australian Food and Grocery Council (AFGC) welcomes this opportunity to comment on Food Standards Australia New Zealand's (FSANZ) 2nd call for submissions (2nd CFS) on *Application A1186 Soy leghemoglobin in meat analogue products*.

The AFGC has reviewed FSANZ's risk assessment which provides comprehensive, detailed and convincing scientific evidence that the application by Impossible Foods to amend the Australia New Zealand Food Standards Code (the Code) to permit the use of soy leghemoglobin in the form of liquid cell lysate preparation (Leg H Prep) in meat analogue products (including the Impossible™ Burger, meatballs, sausages, and as fillings in buns and dumplings) at levels no more than 0.8% weight for weight in raw product presents no consumer foods safety or health implications. Consequently, the AFGC supports *Application A1186 Soy leghemoglobin in meat analogue products*.

GENERAL COMMENTS

The AFGC supports FSANZ's conclusions at 1st and 2nd CFS that soy leghemoglobin in the form of LegH Prep is safe for human consumption in meat analogue products at levels up to 0.8%. It also supports soy leghemoglobin (in the form of LegH Prep) as a nutritive substance to be listed in the Code section S17—3 as a permitted form of iron. Furthermore, it supports LegH Prep meeting the definition of a food produced using gene technology as it is derived from a genetically modified (GM) *P. pastoris* strain and is therefore required to be labelled as 'genetically modified' under the Code section 1.5.2—4.

Permitting soy leghemoglobin in meat analogies across Australia and New Zealand will promote an innovative competitive food industry.

SPECIFIC COMMENTS

FSANZ AFFIRMS THE SAFETY OF SOY LEGHEMOGLOBIN AT PROPOSED LEVELS

The AFGC notes that FSANZ's risk and technical assessment has used internationally accepted processes and practices to assess safety and has deemed that the consumption of meat analogue products that contain soy leghemoglobin in the form of Leg H Prep is safe. Additionally, no further substantive scientific evidence or new arguments were received (in response to the 1st Call for Submissions) that would alter the conclusions of FSANZ.

SOY LEGHEMOGLOBIN IN MEAT ANALOGUE PRODUCTS MEETING A GROWING CONSUMER NEED

Meat analogue products containing soy leghemoglobin derived from *P. pastoris* will provide consumers with access to more choices for nutritious and flavourful plant-based alternative protein products. The demand for plant-based foods is growing domestically and globally as indicated by the sale of over 100 million 113g servings of Impossible Burger internationally.

As stated in our previous submission, this application, if approved, will assist consumers to construct healthy diets aligned to the Australia and New Zealand Dietary Guidelines with a meat substitute that potentially has superior attributes to current market offerings of plant-based products. The AFGC notes that the applicant initially plans to import packaged raw and frozen Impossible meat analogue products into Australia and New Zealand for sale to retail and catering outlets.

CLEAR LABELLING

The AFGC has no concerns regarding labelling of soy leghemoglobin in meat-analogues.

It notes that existing requirements for ingredient labelling and allergen declarations apply to the meat analogue products containing soy leghemoglobin that is sold packaged (e.g. frozen burger patties). For consumers concerned about allergen labelling of ingredients, the applicant has stated the common name of this ingredient is 'soy leghemoglobin' and that packaged food products would carry a 'soy' declaration.

As stated above, as leghemoglobin is produced using gene technology as it is derived from a GM *P. pastoris* strain, it the meat analogue will be required to be labelled as 'genetically modified' under the Code section 1.5.2-4.

Lastly, current labelling requirements for nutrition content and health claims would apply to meat analogue products containing soy leghemoglobin as per the Code Std 1.2.7 and section S4—5 of existing pre-approved general level health claims (if a systematic review to substantiate any food-health relationship is not notified).

CONCLUSION

The AFGC commends FSANZ for the thoroughness with which the science, methodology and safety confirmation of the production and potential use of leghemoglobin in food products has been further assessed and issues raised in the 1st round addressed.

The AFGC fully supports the application progressing through the food regulatory system as rapidly as possible.

RECOMMENDATION

The Australian Food and Grocery Council recommends the amendment to the Australia New Zealand Food Standards Code sought in *Application A1186 Soy leghemoglobin in meat analogue products*.

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