From:
Sent: Sunday, 9 February 2020 9:28 PM
To: submissions
Subject: submissions – Application A1186 Soy leghemoglobin in meat analogue products

A1186 Soy leghemoglobin

Thank you for the opportunity to make this submission

- *In the United States (U.S.), soy leghemoglobin has Generally Recognized as Safe (GRAS) status for use in ground beef analogues at levels not exceeding 0.8% (GRN 737).* However Impossible Foods' GRAS status for SLH is not an assertion by the FDA that the food in question is safe. It means the company says that the food is safe and it, and not the FDA, is responsible for ensuring the safety of the food. This may protect the FDA from liability in case something goes wrong. But they do not protect the consumer.

- *Impossible Foods produces soy leghemoglobin from the fermentation of P. pastoris that has been genetically modified to express the protein. The remainder of the total protein fraction in the LegH Prep is accounted for by residual proteins from the P. pastoris production strain. Yet* 46 other new proteins have been found. Have these been assessed for safety?

- Feeding study times were limited to 14 days, 28 days and 7-8 weeks, despite telling the FDA that they would conduct a 90-day trial. Why was the longer, promised trial not done?

- Groups of 6 were used for the 14 day and 7-8 week studies. Are these acceptable numbers?

- Despite short trials differences were discovered such as unexplained weight gain, blood changes suggesting inflammation or kidney disease onset, and possible signs of anaemia but all were dismissed as irrelevant to the studies. Longer studies and larger groups may well have resulted in more significant outcomes.

I can't help comparing the lack of criticism of these animal feeding trials to the one conducted by Professor Seralini's team when testing for toxicity in GM corn and the application of the pesticide Roundup.

How strange that the studies which showed worrying side effects in animals exposed to novel foods are thoroughly criticised and dismissed to the point of having them rejected by the publication which published them, on the grounds of type of test

animal used, number of animals used, duration of tests etc when this application appears to tick all of the boxes a la FSANZ style.
https://www.gmwatch.org/en/latest-listing/51-2012/14217-scientists-response-to-critics-of-seralinis-study

I notice this novel creation will be just below the % needed to be labelled. Will this be checked, or will it not fall into the already lax GM labelling rules in Australia anyway?