
From:
Sent: Friday, 14 February 2020 11:28 AM
To: submissions
Subject: GE FREE Northland submission- lodged w/ Food Standards Australia NZ re US company: Impossible Foods Application A1186 - Soy leghemoglobin in meat analogue products

Submission on **Application A1186** - Soy leghemoglobin in meat analogue products

Submission to: Food Standards Australia NZ (FSANZ)

Name:

Email:

Thank you for the opportunity to submit.

Our community group makes this submission on behalf of our members, Maori and Pakeha.

We submit that "FSANZ" DECLINE the application by Impossible Foods in its entirety.

We share the concerns of many Northlanders and Aucklanders (where our membership is based) as well as other Kiwis regarding FSANZ's flawed past approvals of various harmful GE/GMO foods (sold unlabelled, undermining consumer right to know and putting the elderly, those with low immune systems, pregnant women and also children at particular risk).

In our view, many FSANZ decisions regarding GE/GMO foods/ingredients that have been based on inadequate safety data and assumptions that are not scientifically sound.

Public confidence in FSANZ and food safety requires a higher standard than that reflected by FSANZ's acceptance of limited and biased data and promotional claims by industry players and those with a pecuniary interest. NZ has no commercial GE/GMO / gene edited crops or animals (or cloned animals) and we do not want unlabelled, risky GE/GMO imported foods in our food chain.

FSANZ needs to decline this application honour its obligations to protect the public health and consumer right to know. Controversial fake-meat products containing LegH Prep that includes GE/GMO soy leghemoglobin are significantly different in nutritional and toxicological profile from naturally produced meat.

These products cannot be "generally regarded as safe" (GRAS) and should not to be considered a dietary meat substitute.

The lack of long term dietary studies requires that FSANZ make no approval. Instead FSANZ must require comprehensive data needed for a genuine safety assessment.

We stress that FSANZ must recognise the risk of misleading the public under current labelling rules. Food at restaurants, takeaway premises, etc are not required to inform consumers. This application exemplifies why GM labelling and consumer warning should be mandatory in all situations.

There are novel untested proteins created in the production process of LegH Prep with potential to impact on food safety and anaphylaxis that demands independent testing before any further consideration by FSANZ.

It is critical that people are not misled to interpret that this soy-based ultra-processed product is equivalent to naturally produced meat protein.

Long-term dietary studies, equivalent to the human lifetime, must test the formulated products including evaluating the estrogenic potential of soy at different ages and the combined effects of chemicals (such as Glyphosate based herbicides) used in crop production.

The right of Kiwis and Australians to avoid such projects and GE/GMO content must be protected, in the interest of consumer "right to know", our food sovereignty, and traceability. We do not want this toxic, highly processed, GMo food in our food chain. It would be unethical to approve it based on the applicants flawed data/ application and lack of robust long term feeding trials (on rodents etc)

In addition to the European decision regarding such types of lab produced synthetic food, independent NZ scientists recommend that all commercial products containing genetically modified soy leghemoglobin (SLH) produced from genetically modified yeast *Pichia pastoris*, and referred to as LegH Prep - include the following labelling:

i. Not a dietary substitute for meat protein

In addition to including the following legally required statements:

ii. Genetically Modified

iii. Contains soy

(5) It is critical that the population does not interpret that this soy-based ultra-processed product is equivalent to naturally produced meat protein.

We support the detailed/ substantive submissions by GE FREE NZ and Physicians & Scientists for Global Responsibility Charitable Trust (New Zealand).

Please keep our community group informed of any opportunity to be heard and the process and your decision regarding this controversial application.