

Thursday 13th February 2020

Food Standards Australia New Zealand
Canberra

Via email to: submissions@foodstandards.gov.au

SUBMISSION: Application A1186 – soy leghemoglobin in meat analogue products

To whom it may concern,

Food Frontier is Australia and New Zealand's independent think tank and industry advisor for alternative proteins (plant-based and cultivated meat). We believe that diversifying protein production globally is critical to feeding the world's growing population in the decades ahead. Our vision is a nutritious, sustainable and future-proof protein supply.

2 By supporting safe and sustainable solutions to the need for global protein diversification, Food Frontier helps future-proof our food system with alternatives that both meet evolving consumer demands and require fewer resources than industrially produced meat.

Impossible's application and the global context

3 The application by Impossible Foods ("Impossible") follows the products' successful release in the USA, Singapore and Hong Kong markets, with other markets under application, including a pending decision by the European EFSA. With tens of millions of units sold through foodservice and grocery channels, Impossible's heme-containing product is well established and safely enjoyed by consumers.

4 The diversification of alternative protein products available in the marketplace enables greater consumer choice, a fundamental objective Food Frontier supports. Recent research by leading market research agency Colmar Brunton has identified that one-in-three Australians are consciously limiting their meat consumption, with an additional 10 percent entirely meat-free.¹ Additional options, such as Impossible, will add to consumer choice in the Australian and New Zealand marketplace.

5 Economic modelling commissioned by Food Frontier and undertaken by Deloitte Access Economics found the domestic market for plant-based meat would grow from \$150 million in 2018-19 to \$3 billion in domestic sales by 2030, and employ over 6,000 Australians.² These quantifiable socio-economic benefits can only be built on an underpinning commercially viable and innovative regulatory framework.

6 Food Frontier encourages FSANZ to consider the application by Impossible in the context of fostering an internationally competitive domestic food sector. The Australian market for alternative proteins is evolving and growing rapidly, with more than 100 products on grocery shelves in Australia, and widespread availability in both foodservice and retail. The recent launch of plant-based meat company v2food, a collaboration between CSIRO and Competitive

¹ Food Frontier and Life Health Foods (research conducted by Colmar Brunton). *Hungry for Plant Based: Australian Consumer Insights*. Melbourne, Australia. October 2019. Available at: <https://www.foodfrontier.org/reports/>

² Lawrence, S and King, T. Food Frontier. *Meat the Alternative: Australia's \$3 Billion Opportunity*. Melbourne, Australia. 2019. Available at: <https://www.foodfrontier.org/reports/>

Foods, has demonstrated the ability of Australian manufacturers to successfully compete with global competitors in the sector, and begin to build a diverse market offering for consumers.

7 Impossible is sold and consumed in multiple international markets, and regulated by the standards within those markets, such as the FDA in the USA. Food Frontier considers it important that the principle of pursuing globally consistent standards is upheld, and that Australia considers standards in those markets in its deliberations. FSANZ has reflected this in its considerations of the FSANZ Act assessment requirements, specifically section 5.3 of the Call for Submissions noting Subsection 18(2) of the Act pertaining to the promotion of consistency between domestic and international food standards.

The safety assessment by FSANZ

8 Impossible has submitted detailed safety data to both FSANZ and the US FDA, including a dietary exposure assessment. FSANZ has noted that “the maximum proposed use level and likely use level scenarios are considered to be conservative” and that “it is unlikely that consumption of meat analogue products containing soy leghemoglobin would pose a risk of iron exceedances to the Australian and New Zealand populations.”

9 Food Frontier further notes that “FSANZ’s risk and technical assessment concluded that soy leghemoglobin in the form of LegH Prep is safe for human consumption at levels up to 0.8% soy leghemoglobin. The safety assessment of the source organism, *P. pastoris* and novel proteins, did not identify any public health and safety concerns. The source organism is a well characterised yeast with a recognised safe history of use for the production of food enzymes; it is neither pathogenic nor toxigenic.”

Summary

10 Food Frontier supports the application by Impossible for the approval of soy leghemoglobin derived from *P. pastoris*, and believes that FSANZ’s approval will give consumers access to more choices for nutritious and flavoursome plant-based alternative protein products in the Australia and New Zealand marketplace.

11 Food Frontier further supports FSANZ’s preliminary position to develop a draft variation to the food standards Code to permit the use of soy leghemoglobin.

12 Food Frontier also supports the rigorous food safety oversight provided by FSANZ, and its efforts to maintain a strong, robust system based on scientific evidence. We welcome the opportunity to continue to engage with FSANZ and provide further information as needed.

Yours faithfully,