

Wednesday 9th September 2020

Food Standards Australia New Zealand
Canberra

Via email to: submissions@foodstandards.gov.au

SUBMISSION: Application A1186 – soy leghemoglobin in meat analogue products

Food Frontier is the independent think tank and expert advisor on alternative proteins in Australia and New Zealand. Food Frontier provides data and insights on alternative proteins and their economic, environmental and public health benefits.

2 The application by Impossible Foods (“Impossible”) follows the products’ successful release in multiple international markets, with over 100,000,000 units sold, and benefits from FSANZ’s “assessment of soy leghemoglobin and the LegH Prep conclud[ing] there are no public health and safety concerns associated with its use in meat analogue products at the proposed levels”.¹ This assessment aligns with other internationally comparable assessments including by Health Canada, the Singapore Food Agency, and the US Food and Drug Administration.

3 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.² Additional options, such as Impossible, will add to consumer choice in the Australian and New Zealand marketplace.

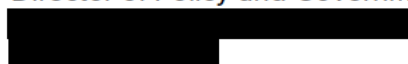
4 Economic modelling commissioned by Food Frontier and undertaken by Deloitte Access Economics found the domestic market for plant-based meat would grow from \$150 million in 2018-19 to \$3 billion in domestic sales by 2030, and employ over 6,000 Australians.³ These quantifiable socio-economic benefits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

5 Food Frontier understands that points raised during the first call for submissions have been addressed, and supports the expeditious approval of Impossible’s application, and the finalisation of this process.

Yours faithfully,



Director of Policy and Government Relations, Food Frontier



¹ Food Standards Australia New Zealand. *Supporting Document 1: Risk and Technical Assessment Report – Application A1186: Soy leghemoglobin in meat analogue products*. Canberra, Australia. August 6 2020.

² 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/>

³ 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/>