

7 February 2020

Standards Management Officer
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To whom it may concern:

On behalf of Allergy & Anaphylaxis Australia I wish to make a submission on **Soy Leghemoglobin in meat analogue products A1186**

Background

Allergy & Anaphylaxis Australia (A&AA) is a charitable, non-profit organisation established in 1993 to support and assist those affected by allergy and anaphylaxis. A&AA is dedicated to assisting individuals, their caregivers and all in the community in the management of allergic conditions including food allergy. A&AA's aim is to enable individuals and their families to enjoy an optimal quality of life whilst minimising risk to their health and wellbeing.

A&AA strives to raise awareness of allergy in the community and provides evidence-based information, resources and services to support children and adults living with allergic disease including food allergy. A&AA has members across all states and territories of Australia. We have a Medical Advisory Board that consists of several allergy specialists who are also members of Australia's peak medical body, ASCIA (the Australasian Society of Clinical Immunology and Allergy).

In 2014 A&AA partnered with ASCIA to develop the National Allergy Strategy with key stakeholder organisations. The National Allergy Strategy was launched in 2015. www.nationalallergystategy.org.au

Submission A1186 – Soy Leghemoglobin in meat analogue products

Summary

A&AA has no objection to the continuing assessment of soy leghemoglobin as an additive in meat analogues, whilst noting that this is a novel protein not normally part of the human diet. And also provided that consumers are made aware that this is a soy product. However A&AA has concerns about the existing labelling requirements under the Food Standards Code which may seem to enable manufacturers to avoid declaring the presence of soy leghemoglobin on a packaged food.

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Presence of soy protein

A&AA notes from the FSANZ supporting document that the “proteins were shown to be susceptible to pepsin digestion and were denatured at standard cooking temperatures and in acidic conditions that mimic the stomach environment”. And so presumably therefore if not subject to pepsin digestion, less than “standard cooking temperatures” or stomach acids would not be digested or denatured?

The underlying two issues are firstly the possibility that susceptible consumers may not always be consuming a denatured protein, and secondly, if so, whether an allergic response can become manifest before the protein in question has been subject to either pepsin or stomach acids. Accordingly A&AA has asked that FSANZ consult the scientific committee that provides expert knowledge on allergic disease to address this issue.

In addition A&AA cannot locate any indication of what exactly constitutes “standard cooking temperatures”, but would assume that cooking at anything less than “standard temperatures” would not denature the subject proteins. It would seem therefore that it is entirely possible that the soy proteins would be intact at the point of consumption in some cases.

Accordingly A&AA strongly supports the FSANZ observation that the allergen labelling provisions must apply to enable consumers to make an informed choice.

Labelling

A&AA notes that soy leghemoglobin would have to be declared in accordance with the Food Standards Code.

Where the product is sold in a package, in most cases there must be an ingredient list. A&AA is concerned that soy leghemoglobin may be declared by an alternative name (such as LegH Prep) which does not indicate the presence of soy protein, and urges FSANZ to include in any proposed amendment to the Food Standards Code a requirement that soy leghemoglobin must be declared as such.

The application indicates that the product’s function is as a flavour, or as a “flavour optimiser”, and could presumably be labelled as such. Whilst standard 1.2.3 requires allergens to be declared when present as an additive, or a component of an additive, standard 1.2.4 provides that a statement of ingredients need not list an ingredient or component of a flavouring substance. See 1.2.4 – 3 (a)

There seems no reason why a manufacturer could not expect to be able to rely on standard 1.2.4, and declare soy leghemoglobin in the ingredient list simply as “flavour” or “flavouring”. A&AA does not consider this acceptable, not just with respect to this product but with respect to potential allergens generally. The conflicting requirements of standards 1.2.3 and 1.2.4 should be resolved without delay.

In addition, a catering product may not show the presence of soy, and a customer in a catering situation, asking wait-staff if a menu item was free from soy, might be assured, after examining the packaging, that the product was indeed free from soy.

Exemption from declaration as allergen

Whilst there is no section of the application which addresses an exemption from standard 1.2.3 for declaration as an allergen, A&AA has noted the extensive detail on the allergenicity of soy leghemoglobin

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and anticipates that such application could be forthcoming, and would expect a high level of assurance that an exemption was appropriate.

Addition of iron

The FSANZ assessment also considers the role of soy leghemoglobin as a source of iron and has been evaluated as such. A&AA has no comment on that aspect apart from the uncertainty surrounding its usage and declaration as a mineral, a flavour, a flavour enhancer or a food ingredient in its own right, and suggests that its role be clearly enunciated in the next stage of the assessment. A&AA notes that “Comments received will be taken into account when deciding whether to develop draft variation(s) at the next stage of assessment.”

Risk Communication

A&AA notes the consultation process at section 4 of the assessment. An education campaign would also seem appropriate if the application were to succeed and the Code amended, given the nature of the ingredient and the role it plays in meat analogues.

Yours faithfully,

Allergy & Anaphylaxis Australia

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