

---

**From:**  
**Sent:** Thursday, 13 February 2020 10:55 PM  
**To:** submissions  
**Cc:** standards management  
**Subject:** submission by Linda Zelka Grammer to 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:

Contact details:

Email:

Thank you for the opportunity to make a submission, so that together we can achieve sound public health and food sovereignty/ biosecurity outcomes and protect consumer "right to know" and traceability.

My submission is that FSANZ decline the application by Impossible Foods.

Our farming family is extremely concerned about FSANZ's inappropriate approvals of various GE/GMO foods in the past. This is an issue of high public concern in both NZ and Australia because of many FSANZ decisions 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.

FSANZ urgently needs to lift its game and honour its obligations. 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.

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.

I strongly support the more substantive submissions by GE FREE NZ and Physicians & Scientists for Global Responsibility Charitable Trust (NZ)

Please keep me informed of any opportunity to be heard and the process and your decision.