

Project Officer Application A1186
Food Standards Australia New Zealand
PO Box 10559
The Terrace
Wellington 6036

14 February 2020

Dear Sir/Madam

Application A1186 – Soy Leghemoglobin in meat analogue products

Thank you for the opportunity to comment on this application.

Safety

New Zealand Food Safety (NZFS) agrees with the FSANZ assessment that there are no public health and safety concerns associated with the use of soy leghemoglobin in meat analogue products at the proposed level of up to 0.8%, and supports the preparation of a draft variation to permit the use of soy leghemoglobin in meat analogue products.

Dietary intake assessment

The margins of exposure (MOEs) derived in the risk characterisation are lower than MOEs usually considered to represent a negligible risk level. We agree that this is not a dietary intake concern taking into account the body of knowledge on the safety of the source organism and proteins, and the conservative nature of the intake. However, the argument that the observed MOEs are acceptable would be further strengthened if it could be confirmed that the highest dose levels and the associated NOAEL used in the toxicity studies were the highest levels consistent with palatability and nutritional balance of the test diets.

In summary, NZFS agrees that the appropriate permissions should be:

- as a food produced using gene technology derived specifically from the GM production strain *Pichia pastoris*
- with a maximum permitted use level of 0.8% (w/w) in raw product
- as a permitted form of iron
- with identity and purity specifications for LegH Prep.

We will be happy to discuss any aspects of this submission with you.

Yours sincerely