



AUSTRALIAN FOOD SOVEREIGNTY ALLIANCE

Submission on Impossible Foods Soy Leghemoglobin Permission

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Addressed to submissions@foodstandards.gov.au

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About the Australian Food Sovereignty Alliance (AFSA)

The Australian Food Sovereignty Alliance (AFSA) is a farmer-led civil society organisation made up of organisations and individuals working together towards a food system in which people can create, manage, and choose their food and agriculture systems. AFSA is an independent organisation not aligned with any political party. We have around 700 farmer, individual, and organisational members.

AFSA provides a balanced voice to represent farmers. We connect small- and medium-scale Australian farmers for farmer-to-farmer knowledge sharing, work with all levels of government for scale-appropriate and consistent regulations and standards for agriculture, and advocate for fair pricing for those selling to the domestic market.

We are part of a robust global network of civil society organisations involved in food sovereignty and food security policy development and advocacy. We are members of the International Planning Committee for Food Sovereignty (IPC), La Via Campesina – the global movement of peasant farmers, and Urgenci: the International Network for Community-Supported Agriculture, and work regularly with Slow Food International and many of its Australian chapters. We also support the Australasian representative on the Civil Society Mechanism (CSM), which relates to the UN Committee on World Food Security (CFS).

Our vision is to enable regenerative and agroecological farming businesses to thrive. Australians care now more than ever about the way their food is produced, including its social and environmental impacts. Food produced on small- and medium-scale regenerative farms is increasingly in demand, and government is bound to heed changing community expectations and facilitate and encourage the growth and viability of regenerative agriculture, thereby protecting the environment and human and animal health.

As a key stakeholder and representative body of small- and medium-scale producers Australia-wide, AFSA is appreciative of the opportunity to submit on Impossible Food's permission application for soy leghemoglobin.

Context

On 20 December 2019 Food Standards Australia New Zealand (FSANZ) called for comment on an application by Impossible Foods Inc to permit soy leghemoglobin in meat analogue products using a genetically modified strain of yeast.

This was the first call for submissions. AFSA notes a second round of public consultation will be undertaken in 2020 and looks forward to active participation in the consultation process going forward.

Recommendations

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| Recommendation 1 | FSANZ should investigate more thoroughly the risks associated with this food substitute as there are emerging public health and safety concerns. |
| Recommendation 2 | Any permission granted to Impossible Foods should be qualified with strict labelling requirements imposed so that a purchaser is clearly informed that the food substitute contains genetically modified ingredients. |
| Recommendation 3 | Any permission granted to Impossible Foods should be qualified with strict labelling requirements imposed so that a purchaser is clearly aware that the product is not actually meat, ie edible tissues from an animal consumed as food ¹ . |

Issues

The risk assessment conducted by FSANZ fails to take into account reported health issues

While the FSANZ Risk and Technical Assessment Report concludes there are no health and safety risks associated with the soy leghemoglobin it is not clear where or by whom the testing referenced within the report was conducted. In fact, the report refers to Impossible Foods own data and report submission. We question therefore the independence of the testing upon which the assessment has been made.

We also note in this respect that the applicants own testing revealed that rats that were fed the soy leghemoglobin experienced unexplained weight gain and showed signs of toxicity, but that these adverse findings were dismissed as “non adverse” or as having “no toxicological relevance”², a

¹ “What is meat? A perspective from the American Meat Science Association”

<https://academic.oup.com/af/article/7/4/8/4775089>

² “Rat Feeding Study Suggests the Impossible Burger May Not Be Safe to Eat”

<https://www.gmoscience.org/rat-feeding-studies-suggest-the-impossible-burger-may-not-be-safe-to-eat/>

finding that seems to have been similarly adopted without question by FSANZ.

Currently the meat substitute products made by Impossible Foods are only available in the United States, Macau, Hong Kong and Singapore. The limited adoption at this stage means that there has not been enough of a pool of eaters from which to draw evidence of the health effects of the soy leghemoglobin. Anecdotal evidence from consumers in the United States suggests that people are having reactions to the product such as nausea, stomach pain, palpitations and anxiety.³

It goes without saying that the nutritional qualities of the product are questionable, as evidenced by many, many reference articles, a small sample of which is below:

<https://www.health.harvard.edu/blog/impossible-and-beyond-how-healthy-are-these-meatless-burgers-2019081517448>

<https://www.healthline.com/nutrition/impossible-burger>

<https://www.vox.com/future-perfect/2019/10/7/20880318/meatless-meat-mainstream-backlash-impossible-burger>

AFSA submits that FSANZ should investigate more thoroughly the risks associated with this food substitute as there are clear emerging health and safety concerns. Being one of the world's "early adopters" for Impossible Foods substitute meat products is surely not a safe or rational path for Australian consumers.

Genetically modified ingredients

The key ingredient in the applicant's product is known as "heme" or soy leghemoglobin. This heme is genetically engineered by adding soy protein to genetically engineered yeast.

Genetically modified food has been around for decades now. Toxicity arising from the consumption of genetically modified food is now a well-known and much debated malady⁴. Given the health risks associated with genetically modified foods, we would argue that the applicant's products need to be clearly labelled as genetically modified, even in the fast food context.

AFSA therefore would ask that any permission granted to Impossible Foods should be qualified with strict labelling requirements imposed so that a purchaser is clearly informed that the food substitute contains genetically modified ingredients.

Truth in food labelling – misleading and deceptive "meat" claims

While we note that Impossible Foods packaging to date labels their product as, for instance, "**Burger Made from Plants**" the reality is that most consumers buying meat look past the labelling to the actual product behind the plastic wrapping. And therein lies the problem – the product truly does look like minced meat:

³ https://www.reddit.com/r/vegan/comments/8l4357/impossible_burger_making_me_sick/

⁴ "Will GMOs Hurt my Body? The Public's Concerns and How Scientists have Addressed Them"
<http://sitn.hms.harvard.edu/flash/2015/will-gmos-hurt-my-body/>



The location that such produce is placed in stores is also significant as the context adds to the deception – if they appear in the meat section then people are often misled into believing they are actually meat, which occurred recently in relation to a competitor product⁵.

AFSA believes that consumers deserve the opportunity and indeed have the basic human right to make informed choices about their food purchases. The labelling must clearly indicate that the plant-based burger is not meat.⁶

AFSA thanks FSANZ for the opportunity to submit and would welcome further discussion on this application.

⁵ “Shoppers Outraged over “Misleading” Vegan “Meat” Product Labelling” <https://7news.com.au/lifestyle/food/shoppers-outraged-over-misleading-vegan-meat-product-labelling-c-171612>

⁶ “Will the Australian Regulator Change its Tuna?” <https://www.allens.com.au/insights-news/insights/2019/08/will-the-australian-food-regulator-change-its-tuna/>

About Food Sovereignty

“Food sovereignty asserts the right of peoples to nourishing and culturally-appropriate food produced and distributed in ecologically-sound and ethical ways, and their right to collectively determine their own food and agriculture systems.”⁷

The core of food sovereignty lies in the following principles:

- Food is a human need and a basic right, rather than a commodity.
- Food systems should be democratically constructed, responding to diverse social, cultural and environmental conditions.
- Food systems should be based on a strong commitment to social justice: for farmers, food system workers, and the most vulnerable members of our society who experience food insecurity.
- Resilient food systems require long-term environmental sustainability, transitioning away from dependence on fossil fuels and chemical inputs.
- Resilient and sustainable food systems will be more localised and regionalised.
- Trade in food and agricultural products can enhance economic and social well-being but should be conducted on the basis of international solidarity, respecting and not undermining the food sovereignty ambitions of other peoples and countries.⁸

⁷ The Australian Food Sovereignty Alliance, <<https://afsa.org.au/?s=food+sovereignty+>>.

⁸ Patel, R. (2009). What does food sovereignty look like? *Journal of Peasant Studies*, 36(3), 663-671.