



Enquiries to: Food Safety Standards and
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Dear Sir / Madam

Submission: A1186 – Soy leghemoglobin in meat analogue products

Thank you for the opportunity to provide a submission on the 2nd Call for submissions report for Application A1186.

This submission provides technical advice and comments related to this issue. The submission does not represent a Queensland Government position, which will be a matter for the Queensland Government when notification is made by the FSANZ Board to the Australia and New Zealand Ministerial Forum on Food Regulation.

Consideration may need to be given to providing suitable information on the iron content of soy leghemoglobin meat analogue products to the public and health professionals, to assist people manage their iron intake when required for medical reasons. This may include people that suffer from haemochromatosis and abnormally store iron, and on the contrary people with anaemia. Since meat analogue products containing soy leghaemoglobin are new to the market, it is likely that most people will be unaware they are a good source of iron and that it is more bioavailable than in alternative meat analogue products.

This issue could be managed by the inclusion of suitable labelling information, such as listing the amount of iron present in the nutrition information panel (NIP). This information is mandatory in the United States, where the label for Impossible Burger indicates an amount of iron and %DV (daily value) of 4.2 mg per 113 g serve (3.7 mg/100 g) and 25% DV per 113 g serve, respectively. However, NIP requirements in the Food Standards Code do not require iron to be included unless a nutrition content or health claim is made in relation to iron. As such, there is not a mandatory requirement for the declaration of iron to enable consumers to make an informed choice. The issue may be resolved without changes to the Code, if the applicant makes nutrition content claims in relation to iron in Australia. However, mandatory measures may need to be considered if such iron rich meat analogue products become widely available. While soy leghemoglobin meat analogues may initially not be a frequently consumed product, this could quickly change as they become more readily available, affordable and accepted.

Food Safety Standards and Regulation Unit
Health Protection Branch
Department of Health
Queensland Government

17 September 2020