



Standards Management Officer
Food Standards Australia New Zealand
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16th September 2020

To whom it may concern:

Application A1186 Soy leghemoglobin in meat analogue products

Allergy & Anaphylaxis Australia (A&AA) reiterates its request that the issue of allergenicity be referred to the Food Allergy and Intolerance Scientific Advisory Group of experts in allergic disease to confirm FSANZ's stance and give A&AA more confidence in the medical science behind FSANZ's findings.

A&AA notes the following FSANZ response to submitters suggesting consulting a scientific committee that provides expert knowledge on allergic disease.

"FSANZ has access to external experts, in particular the Food Allergy and Intolerance Scientific Advisory Group. In regard to this application, analysis of the data did not raise concerns regarding allergenicity, therefore the scientific advisory group was not consulted.

Additionally, post-market surveillance data provided by international regulatory partners has not identified any confirmed adverse events following consumption of meat analogue products containing soy leghemoglobin. This is consistent with data provided by the applicant and the outcomes of FSANZ's safety assessment."

In addition, A&AA notes the following FSANZ response to a submitter's comment that "The USFDA has said that, Conformational similarity or functional similarity among proteins is not an indication of the safety of proteins for consumption."

"FSANZ did not base its safety assessment only on structural or sequence similarity but rather considered the totality of the evidence, which in this case consisted of a full molecular characterisation, assessment of physicochemical properties, toxicology, nutritional and dietary intake assessment. After considering all the evidence FSANZ concluded there are no public health and safety concerns associated with the use of LegH Prep in meat analogue products at the proposed levels."

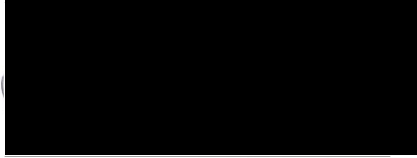
Allergy & Anaphylaxis Australia – *Your trusted charity for allergy support*

PO Box 7726, Baulkham Hills NSW 2153
Ph: 02 9680 2999

www.allergyfacts.org.au

A&AA provides advice through its website and directly to those with allergies, and their carers, about the safety of foods and their ingredients and components. To provide information on the safety of soy leghemoglobin to a person with a soy allergy, A&AA, or indeed any other like professional or organisation, would expect to receive advice that has been reviewed in Australia and New Zealand, as thoroughly as possible. In that context A&AA urges FSANZ to seek endorsement of its findings and conclusions from the Food Allergy and Intolerance Scientific Advisory Group.

Yours faithfully,





CEO
Allergy & Anaphylaxis Australia

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