

New Zealand Food Safety

Haumaru Kai Aotearoa

Project Officer Application A1163
Food Standards Australia New Zealand
PO Box 10559
The Terrace
Wellington 6036

18 July 2019

Dear Sir/Madam

Application A1163 – Food irradiation definition of herbs and spices (Call for submissions)

Thank you for the opportunity to comment on this application. The Ministry for Primary Industries (MPI) has the following comments to make;

MPI supports a variation to Standard 1.5.3 so that herbs and spices includes (but is not limited to) a herb or a spice described in Schedule 22.

While outside of the scope of this application, MPI wishes to comment that the lack of clarity as to the meaning of the terms 'herbs' and 'spices' is not limited to Standard 1.5.3. The terms 'herbs' and 'spices' are used in several other places in the Food Standards Code. One area where this lack of clarity has been problematic is in the area of alcoholic beverages where some standardised alcoholic beverages are permitted to contain 'spices' but not 'herbs'. With the innovation that is occurring in this space clarity would be beneficial to industry as well as government.

MPI notes that an assessment of public health and safety was not considered necessary by FSANZ given the nature of the changes sought by the application, but that any new herbs or spices would be subject to the Novel Food Standard, and if novel would be subject to a risk assessment.

Yours sincerely,

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Ministry for Primary Industries
Manatū Ahu Matua

