

## SA HEALTH SUBMISSION ON -

### A1163 - Food Irradiation definition of herbs and spices

The purpose of this Application is to vary Food Standard 1.5.3 Irradiation of Food to remove the reference to Schedule 22 in relation to the definition of Herbs and Spices.

July 2019

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SA Health welcomes the opportunity to provide comment on A1163 - Food Irradiation definition of herbs and spices.

SA Health is of the view that the proposed definition for herbs and spices does not provide any further regulatory certainty for enforcement purposes. The proposed definition is basically a list of some plants and plant products that are considered to be herbs and spices with the proviso that lots of other plant material may also be herbs and spices. Providing an open-ended definition means that enforcement agencies will use the Schedule 22 as a guide but if the plant or plant product is not listed, then they still need to make a decision about whether the material is a herb or spice without specific information to aid the decision. Therefore there is no improvement of clarity in the decision process.

SA Health would prefer that no definition be provided in the Food Standards Code (Code) and rely on the Macquarie dictionary definition for herbs and spices. This is the case for the majority of foods that do not have a specific definition in the Code that rely on the dictionary definition to describe it.

If a definition is necessary to be included in the Code, then the Macquarie definitions could be listed in the Code or modifications of them which are agreed with consultation which aligns with the applicant's request.

**Herb** 1. A flowering plant whose stem above ground does not become woody and persistent. 2. Such a plant when valued for its medicinal properties, flavour, scent or the like.

**Spice** 1. Any of a class of pungent or aromatic substances of vegetable origin, as pepper, cinnamon, cloves, and the like, used as seasoning, preservatives.

Food classes in Schedule 22 were never intended as a set of definitions of foods that apply across the Code, If that was the case, the definitions in Schedule 22 for other foods may not align with the definitions in other parts of the Food Standards Code.

It is also important that the definition for herbs and spices should not include plant materials listed in Schedule 23 Prohibited plants and fungi.