

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 2, 5c, 5d and 8

CRD 18

Original language only

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD ADDITIVES

#### Fiftieth Session

#### Comments of Indonesia

#### Item 2

Note 301 “interim maximum level until CCFA50” associated with benzoate in FC 14.1.4 in the General Standard for Food Additives (CXS 192-1995)

Comment:

Based on discussion on the last Codex Committee on Food Additives and taking into account the safety and industrial capability, Indonesia supports the maximum level of benzoates in FC 14.1.4 at 250 mg/kg.

#### Item 5c

#### Recommendation 1

Question	Comment
<i>QI What expression of the MLs (i.e. as ingoing or residual or both) is supported by the available data,taking into account the relationship between ingoing and residual amounts, in relation to the protectionof human health, i.e. inhibitory effect on bacteria (especially Cl. botulinum), nitrosamines formation in all routes and ADI?</i>	Indonesia considers no new scientific advice needed
<i>QII Does exposure to nitrites and nitrates pose a health risk? What are recent exposures from all sources and from food additive uses? What is the relative contribution of dietary exposure from foodadditive uses relative to exposure from other sources (fruits, vegetables and drinking water)?</i>	Indonesia considers no new scientific advice needed
<i>QIII Does exposure to nitrosamines (exogenous and endogenous) pose a health risk? What are recent exposures from all sources and from food additives to nitrosamines generated during: i) the production process in foods; ii) heat-treatment in the domestic setting; and iii) gastrointestinal transit?</i>	Indonesia considers new scientific advice needed for QIII in order to have an update information on recent exposures
<i>QIV What are appropriate levels (ingoing and residual) necessary to inhibit Cl. botulinum in view of risk (nitrosamines, ADI being exceeded) and benefit (microbiological safety) considerations taking intoaccount other factors affecting microbial growth?</i>	Indonesia considers no new scientific advice needed
<i>QV To what extent does the use of additives such as ascorbic acid in conjunction with nitrates and nitrites reduce nitrosamine formation and mitigate the potential health risk from the use of nitrates andnitrites? Is available information sufficient to allow the safe use of nitrates and nitrates at higher levels when used in conjunction with these additional additives?</i>	

**Recommendation 3**

Option A: *Waiting for the new scientific advice and addressing the CA concerns (and if relevant the SA concerns for which no new scientific advice will be required) only afterwards, i.e. when the new scientific advice is available*

Option C: *Addressing the CA concerns (and if relevant the SA concerns for which no new scientific advice will be required) prior to the new scientific assessment and using the information obtained in the new scientific assessment*

Comment :

In order to have an effective and efficient time management Indonesia supports option C for action by CCFA to consider assigning an INS number to this food additive before inclusion in the GSFA.

**Item 5d****Recommendation 1:**

Consider the definitions of unprocessed (food raw materials or fresh food) and minimally processed (plain) foods for inclusion in the *General Standard for Food Additives* (CXS 192-1995)

**Comment:**

Indonesia considers that the terms 'plain' and 'minimally processed' have different meaning. Based on Food Category System in the GSFA, the term 'plain' is only used in food products in FC 01.0, 'plain' refers to product that is not flavoured, nor contains fruit, vegetables or other non-dairy ingredients, nor is mixed with other non-dairy ingredients, unless permitted by relevant standards.

**Recommendation 2:**

Consider the provision not to use food additives in unprocessed (food raw materials or fresh food) and to restrict the use of food additives in minimally processed (plain) foods.

**Comment:**

Indonesia supports recommendation 2 and regarding the use of food additives in 'plain products', Indonesia also supports to restrict the use of food additive. Indonesia proposes the following modification to the decision tree (see on next page):

**Recommendation 3:**

To consider the following options to technological justification for the use of a food additive in minimally processed (plain) foods:

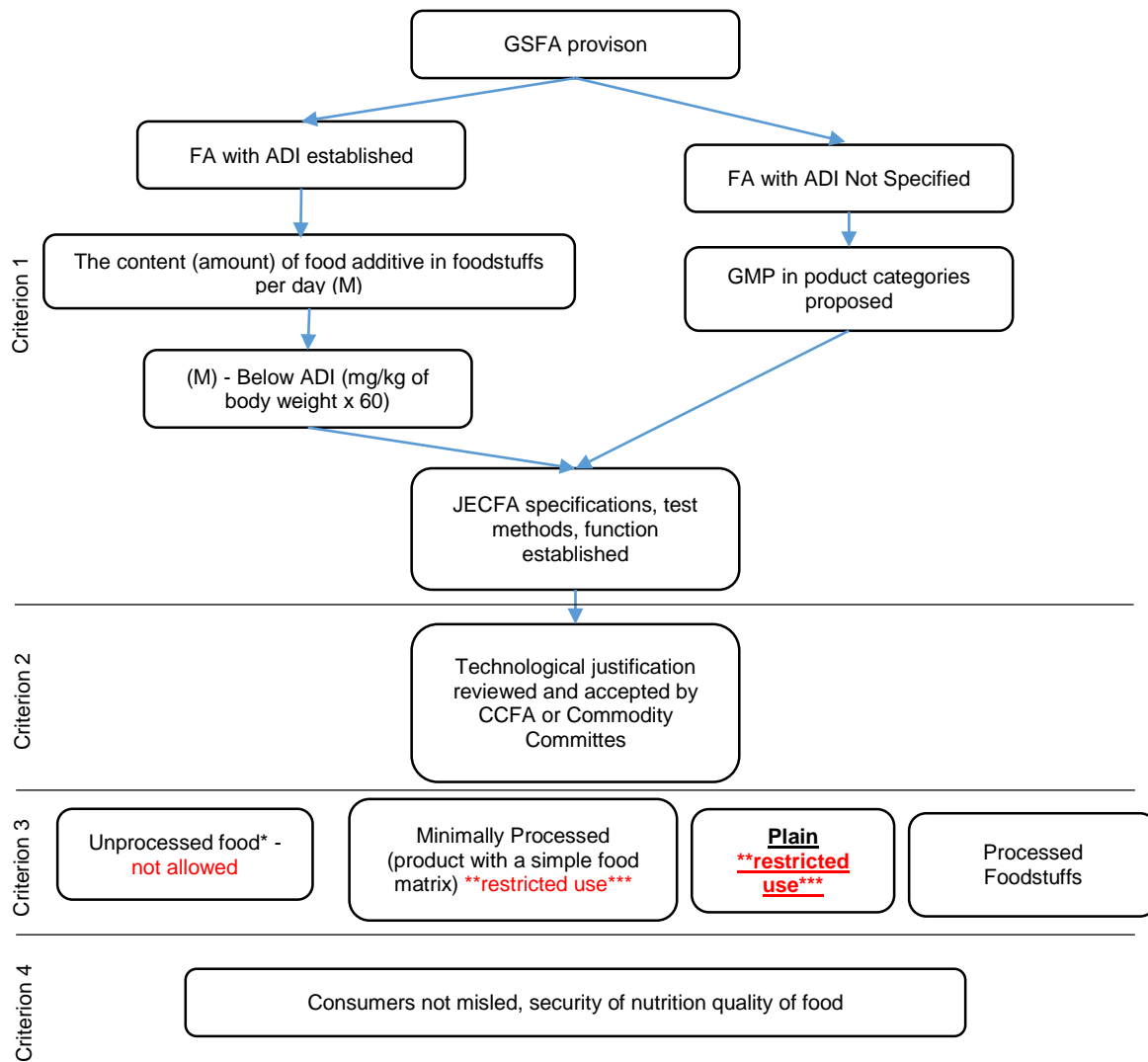
Option 1 - the decision should be made taking into consideration:(1) the technological necessity, (2) a possible change in the nutritional value of food, (3) the risk of misleading consumers about the organoleptic and physicochemical properties the minimally processed (plain) food;

Option 2 - the decision should be made taking into consideration:(1) the technological necessity, (2) the risk of misleading consumers about the organoleptic and physico-chemical properties the minimally processed (plain) food;

Option 3 - the decision should be made taking into consideration:(1) the technological necessity.

**Comment:**

Indonesia supports option 2. Consideration of nutrition value in foods related to the use of food additives are already mentioned in the General Principles for the Use of Food Additives of the Preamble of the GSFA.



**Item 8**

**I. General Standard for Food Additives (GSFA)**

**Recommendation 1:**

That the Committee utilize a new process by which provisions entered into the Step Process at Step 2 will automatically be circulated for comment at Step 3 by the subsequent GSFA EWG.

**Comment:**

Indonesia supports the Committee to use the proposed new process for reviewing the provisions currently in the step process.

**Recommendation 4:**

That the Committee consider the addition of the following bolded text to the Background section of the INS in order to clarify the relationship between the INS and the GSFA:

*The International Numbering System for Food Additives (INS) is intended as a harmonised naming system for food additives as an alternative to the use of the specific names, which may be lengthy. Inclusion in the INS does not imply approval by Codex for use as food additives. The list may include those additives that have not been evaluated by the Joint FAO/WHO Expert Committee on Food Additives (JECFA) or are not included in the General Standard for Food Additives (CODEX STAN 192-1995)*

**Comment:**

Indonesia supports the addition of text to clarify the relationship between INS and the GSFA.

**V. Processing Aids**

**Recommendation 10:** That the Committee consider the following related options:

Option 1 - Maintain the Processing Aids Database as an up-to-date reference on the use of processing aids;

Option 2 - As a future priority not to be completed at this time, review/amend the *Guidelines on Substances used as Processing Aids* (CAC/GL 75-2010)

**Comment:**

Indonesia supports option 2. The first step needs to be taken is to review the Guidelines on substances used as Processing Aids (CAC/GL 75-2010) and continued by updating the processing aids database.