

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 3a,4a,4b,6,7abcd,8,9,12,13

CRD25

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ORIGINAL LANGUAGE

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

51st Session

Macao SAR, P.R. China, 8-13 April 2019

COMMENTS OF INDONESIA

The Government of Indonesia would like to submit the following comments:

Indonesia would like to congratulate for the 51st session Codex Committee on Pesticide Residues. Indonesia would like to thank the Committee for this work and also would like to use this opportunity to offer comments.

Agenda Item 3(a) Matters referred to CCPR by CAC and/or other subsidiary bodies

Indonesia agrees that CAC41 (2018) adopted draft and proposed draft MRLs for pesticides/commodity combination at step 8 and 5/8 (with omission of step 6/7) nothing the reservation of the EU supported by Norway and Switzerland for the reasons provided in CX/CAC 18/41/4 (REP 18/CAC, para 47, Appendix III).

Agenda Item 3(a) Discussion paper on Guidelines for the determination of pesticides as endocrine disruptors and harmonized risk management approaches in respect of their presence in foods

Indonesia agrees on the revision of the Classification of Food and Feed (CXM 4-1989), revocation of maximum residue limits for pesticides and discontinuation of work on a number of proposed draft and draft MRLs for pesticide / commodity combinations in the Step Procedure. (REP17/CAC, Appendix VII).

Indonesia supports the issue raised by India in CRD4 relating to pesticides as endocrine disruptors and support the discussion paper prepared by India with title Guidelines for the determination of pesticides as endocrine disruptors and harmonized risk management approaches in respect of their presence in foods. These are important thing to concern because related to human health.

Agenda Item 4(a) Matters of interest arising from FAO and WHO

Indonesia agrees that FAO/WHO Scientific Advice collected pesticide monitoring plans and individual food consumption data in order to perform a probabilistic assessment of the acute exposure for 47 pesticides having an acute reference dose.

Agenda Item 4(a) JECFA/JMPR Working Group on the revision of the residue definition

Indonesia agrees that JECFA/JMPR working group organized back-to-back with the FAO/WHO/OECD workshop made the following recommendations to harmonize the methodology used for pesticides and veterinary drugs

Agenda Item 4(a) Acute probabilistic exposure assessment for pesticides

Indonesia agrees on Joint FAO/WHO Meetings on Pesticide Residues (JMPR) now routinely considers the need to set an acute reference dose (ARfD) for all pesticides it evaluates. In order to characterize the risk for those chemicals for which an ARfD is established, an acute dietary exposure assessment may be performed using deterministic or probabilistic methodologies.

However, establishment of value acute reference dose also needs representative database from Asia countries.

Agenda Item 4(b) Matters of interest arising from other international organizations

Indonesia agrees with The Food and Agriculture Organization of the United Nations (FAO) and International Atomic Energy Agency (IAEA), through the Joint FAO/IAEA Division of Nuclear Techniques in Food and Agriculture (herein after "Joint FAO/IAEA Division"), work with Member Countries to contribute to food security and sustainable agricultural development by use of nuclear techniques and biotechnology.

Agenda Item 6 Proposed MRLs for pesticides in food and feed (at Steps 7 and 4)

Indonesia supports the advancement of the proposed draft MRLs in food and feeds at steps 7 and 4.

Indonesia supports the proposed MRLs for pesticides in food and feed, especially: Abamectin, Lambda-cyhalothrin and profenofos.

Agenda Item 7(a) Class C – Primary feed commodities, Type 11: Primary feed commodities of plant origin

Indonesia agrees on the conclusion 1 and supports Canada proposed on separating out grasses from cereal grains because of the difficulty in identifying appropriate representative commodities.

Agenda Item 7(b) Class D – Processed foods of plant origin, All types in Class D

Indonesia agrees on the CCPR which is invited to consider the revised Class D (Appendix I)

Agenda Item 7(c) Transfer of commodities from Class D to Class C

Indonesia agrees on the recommendation about transfer of commodities from Class D (Processed Food Commodities Of Plant Origin) to Class C (Primary Animal Feed Commodities)

Agenda Item 7(d) Proposed table on examples of representative commodities for commodity groups in different types under Class C and Class D (for inclusion in the Principles and Guidance for the Selection of Representative Commodities for the Extrapolation of MRLs for Pesticides to Commodity Group (CXG 84-2012))

Indonesia agrees on the revision of the Classification commodity class D and C and Guidance for the Selection of Representative Commodities for the Extrapolation of MRLs for Pesticides to Commodity Group.

Agenda Item 7(f) Any Class, Type on miscellaneous commodities, not meeting the criteria for crop grouping

Indonesia agrees on CCPR which is considering the format and codes in Appendices I and II taking into account the agreement made at CCPR50

Agenda Item 7(g) Class B – Primary food commodities of animal origin, Common definition of edible animal tissues for the establishment of MRLs of pesticides and veterinary drugs for compounds with dual uses as pesticides and veterinary drugs for use by CCPR and CCRVDFPR

Indonesia agrees on the common definition for edible animal tissues to facilitate the establishment of MRLs for pesticides and veterinary drugs for compounds with dual uses (pesticides and veterinary drugs)

Agenda Item 8 Discussion paper on the opportunity to revise the Guidelines on the use of mass spectrometry for the identification, confirmation and quantitative determination of pesticide residues (CXG 56-2005)

Indonesia supports the new work on the revision of the guidelines on the use mass spectrometry for the identification, confirmation and quantitative determination of pesticide residue and the establishment of the EWG.

Indonesia proposes to add HPLC tolerance intervals of the absolute retention time in phase 1, since the document only provide information on GC tolerance intervals of the absolute retention time in phase 1, to be inline with Figure 1. Schematic Representation of Screening and Confirmation in Appendix II.

Agenda Item 9 Discussion paper on the review of the IESTI equations

Indonesia supports the conclusion of the IESTI equation which is used as a proxy for estimating the acute dietary exposure at international level. The risk assessment of pesticide residues in food is one of the key function of the JMPR.

Agenda Item 12 Discussion paper on the management of unsupported compounds

Indonesia agrees on the management of unsupported compounds, national registration of pesticides and priority list of pesticides for evaluation by JMPR

Agenda Item 13 National registrations of pesticides

Indonesia agrees on the recommendation regarding the NATIONAL REGISTRATIONS OF PESTICIDES (Based on information submitted in reply to CL 2017/50-PR) (Prepared by the Electronic Working Group chaired by Germany co-chaired by Australia)