

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: [codex@fao.org](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda Item 5, 6, 7

CRD11

Original Language Only

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD HYGIENE

Fiftieth Session

Panama, 12 – 16 November 2018

#### Comments of Indonesia

AGENDA 5: Proposed draft revision of the General Principles of Food Hygiene (CXC 1-1969) and its HACCP Annex at Step 4

Specific Comments:

Paragraph 4 :

Indonesia does not support the creation of a new term "review of hazards"

Rationale :

The new term "review of hazards" is part of HACCP its self, therefore it is no need to use review of hazards.

Q1: There has been mixed views about this table –views are requested on whether it is useful or whether it should be deleted?

Indonesia agree with existing table, that is useful as a guideline toward HACCP

Q2: Are there any FAO/WHO programmes which can be referenced here?

No comments

Q3: Original text from CXC 1–1969 has been moved to the section on water. Is there agreement that this text fits here?

Indonesia agrees that the original text from CXC 1–1969 fits in the section of water

Q4: Do we need a paragraph to discuss monitoring of temperature of premises, equipment and food?

The text in para 63 also address similar issue. Agree that the text may not be needed

Q5: Further discussion is required to determine whether the word 'Sanitation' should be used or whether it should be defined as there may be an issue when this term is translated. As a suggestion, the word 'Cleanliness' has been used in the title – is this acceptable? If it is, it can be

used within the text.

Indonesia finds the word 'sanitation' to be the most complete; it should be defined in the document. Changing of term 'sanitation' to term of 'disinfection' somehow will be affects the whole document that using term 'sanitation', e.g CAC RCP 53, CACRCP 15, etc, that is concern us.

Rationale :

The term of sanitation has been used widely in Indonesia.

Q6: Validation has been added to Principle 6 on verification because the application text for Principle 6 included a statement on validation. However, it may be more appropriate to include 'Validation' under Principle 3. What do members think? The definitions which were here have been moved to an earlier section.

Indonesia agrees with adding validation to Principle 6 on verification.

Q7: Decision tree at Diagram 2 provided by Brazil and amended by UK. Are Members content with this inclusion?

Indonesia agrees the improved decision tree at Diagram 2. However there is concern arise, CCP decision tree introduces a new concept "Higher GHP control" which is not defined. The

distinction between "PRPs", "GHP measure" and "Control measures" is not clear.

Q8: This section has been retitled and includes additional text – are members content with the amendments?

Indonesia is content with the amendments.

AGENDA 6: Revision to the Code of Practice for Fish and Fishery Products (CXC 52-2003)

Paragraph 4.1

Indonesia agrees with addition of the sentences “chilled rapidly and” Refer to Section 9-bis for further information on control of scrombotoxin

Related to shellfish, Indonesia request data to support on the shellfish is there a report of the formation of scrombotoxin if any. Indonesia agrees shellfish to enter if there are suggestions it is removed

Paragraph 5.3.3.1.1

Indonesia agrees the addition of the word “during and’ and (e.g scrombotoxin)

Indonesia added the word “Vacuum or modified atmosphere packaging (MAP)” because in sub section 9.2.2 it was written “Vacuum or modified atmosphere packaging, so it must be synchronized. Indonesia agrees with addition of the paragraph “For fish susceptible to scrombotoxin formation, refer to Section 9-bis “Harvesting, Processing, Storage and Distribution of Fish and Fishery Products at Risk for Scrombotoxin (Histamine) Formation” for information on the control of histamine, including guidance for harvest vessel operations”

Paragraph 9.1.5

Indonesia agrees with addition of the word “decomposition”

Paragraph 9.2.2.

Indonesia agrees with addition of the word “subsequent scrombotoxin”

Paragraph 9.3.1

Indonesia agrees with addition of the word “scrombotoxin”

Indonesia agrees with addition of the word “decomposition”

Paragraph 9.4.2

Indonesia agrees with addition of the word “decomposition”

Paragraph 9.4.3

Indonesia agrees with addition of the word “microbiological contamination” and “scrombotoxin”

Indonesia agrees with addition of the word “decomposition”

Paragraph 9.4.4

Indonesia agrees with addition of the word “scrombotoxin”

Paragraph 10.2.1

Indonesia agrees with addition of the word “scrombotoxin”

Paragraph 10.2.2

Indonesia agrees with addition of the word “scrombotoxin”

Indonesia agrees with addition of the word “decomposition”

Paragraph 10.4

Indonesia agrees with addition of the word “scrombotoxin”

Paragraph 10.5

Indonesia agrees with addition of the word “scrombotoxin”

Indonesia agrees with addition of the word “decomposition”

Paragraph 10.6

Indonesia agrees with addition of the word “scrombotoxin”

Paragraph 10.7

Indonesia agrees with addition of the word “scrombotoxin”

Indonesia agrees with addition of the word “decomposition”

Indonesia agrees with addition of the word “and scombrotoxin formation”.

Indonesia agrees with addition of the word “and scombrotoxin formation”.

Paragraph 10.8

Indonesia agrees with addition of the word “scrombotoxin”

Indonesia agrees with addition of the word “decomposition”

Indonesia agrees with addition of the word “and scombrotoxin formation”.

Indonesia agrees with addition of the word “pathogenic microbial growth, scombrotoxin formation”.

Paragraph 10.9

Indonesia agrees with addition of the word “scrombotoxin”

Indonesia agrees with addition of the word “and to prevent scombrotoxin formation”

Paragraph 10.13

Indonesia agrees with addition of the word “scrombotoxin”

Paragraph 11.3.1.1

Indonesia agrees with addition of the word “and microbiological” and “scombrotoxin”

Paragraph 11.3.5.2

Indonesia agrees with addition of the word “scrombotoxin”

Indonesia agrees with addition of the word “decomposition”

Indonesia agrees with addition of the word “and scombrotoxin formation”.

Paragraph 11.3.5.3

Indonesia agrees with addition of the word “scrombotoxin”

Indonesia agrees with addition of the word “decomposition”

Paragraph 11.3.7.1

Indonesia agrees with addition of the word “affect”

Indonesia agrees with addition of the word/sentences “all species of ” and “have the following scientific and common names”

Paragraph 12.1

Indonesia agrees with addition of the sentence “Refer to Section 9-bis for technical guidelines for the control of scombrotoxin”

Paragraph 12.2.1

Indonesia agrees with addition of the word “scrombotoxin”

Indonesia agrees with addition of the word “decomposition”

Paragraph 12.2.4

Indonesia agrees with addition of the word “scrombotoxin”

Paragraph 12.2.5

Indonesia agrees with addition of the word “scrombotoxin”

Paragraph 12.4

Indonesia agrees with addition of the paragraph “The temperature should also be sufficiently controlled to prevent the formation of histamine in susceptible species”

Indonesia agrees with addition of the word “(ideally below 4 °C)”

Paragraph 12.4.6

Indonesia agrees with addition of the word “microbiological contamination”

Indonesia agrees with addition of the word “growth of microbial pathogens and”

Indonesia agrees with addition of the sentence “provided the salt concentration is sufficient to inhibit scombrotoxin formation”

Paragraph 12.5.2

Indonesia agrees with addition of the word “scrombotoxin”

Paragraph 13. 1

Indonesia agrees with addition of the paragraph “For fish at risk for scombrotoxin formation, the times of product exposure between refrigerated and hot smoking temperatures should be monitored to control histamine formation (refer to Section 9-bis for technical guidelines on histamine control)”

Paaragraph 13.1.1

Indonesia agrees with addition of the sentence “Refer to Section 9-bis.1 for fish susceptible to scombrotoxin”

Paragraph 13.1.2

Indonesia agrees with addition of the sentence “(e.g. 0-8C°)”

Paragraph 13.1.3

Indonesia agrees with addition of the word “scrombotoxin”

Indonesia agrees with addition of the word “decomposition”

Paragraph 13.1.4

Indonesia agrees with addition of the word “scrombotoxin”

Paragraph 13.1.10

Indonesia agrees with addition of the word “scrombotoxin”

Indonesia agrees with addition of the word “decomposition”

Indonesia agrees with addition of the sentence “and scombrotoxin formation in susceptible species”

Paragraph 13.1.11

Indonesia agrees with addition of the word “scrombotoxin”

Indonesia agrees with addition of the word “decomposition”

Paragraph 13.1.12

Indonesia agrees with addition of the word “scrombotoxin”

Indonesia agrees with addition of the word “decomposition”

Paragraph 13.1.13

Indonesia agrees with addition of the word “scrombotoxin”

Indonesia agrees with addition of the word “decomposition”

Paragraph 13.1.14

Indonesia agrees with addition of the word “scrombotoxin”

Indonesia agrees with addition of the word “decomposition”

Paragraph 13.1.15

Indonesia agrees with addition of the word “scrombotoxin”

Paragraph 13.1.16

Indonesia agrees with addition of the word “scrombotoxin”

Paragraph 13.3.1

Indonesia agrees with addition of the word “scrombotoxin”

Paragraph 13.3.2

Indonesia agrees with addition of the word “scrombotoxin”

Indonesia agrees with addition of the word “decomposition”

Paragraph 17.2.1

Indonesia agrees with addition of the sentence “Refer to Section 9-bis for further information about histamine control”

Paragraph 17.3.1.1

Indonesia agrees with addition of the sentence “(and Section 9-bis.4.1 for scombrotoxin-forming fish)”

Paragraph 17.3.3

Indonesia agrees with addition of the word “scrombotoxin”

Indonesia agrees with addition of the word “decomposition”

Paragraph 17.3.5.1

Indonesia agrees with addition of the word “scrombotoxin”

Indonesia agrees with addition of the word “decomposition

Indonesia agrees with addition of the word “and 9-bis”

Paragraph 17.4.1

Indonesia agrees with addition of the word “scrombotoxin”

Indonesia agrees with addition of the word “decomposition

Paragraph 17.4.2.1

Indonesia agrees with addition of the word “scrombotoxin”

Indonesia agrees with addition of the word “decomposition

Paragraph 17.4.3

Indonesia agrees with addition of the word “scrombotoxin”

Indonesia agrees with addition of the word “decomposition

Indonesia agrees with addition of the sentence “for these it is necessary to refer to Section 9-bis of this Code”

Indonesia agrees with addition of the word “and 9-bis”

Paragraph 20.1

Indonesia agrees with addition of the word “scrombotoxin”

Indonesia agrees with addition of the sentence “Refer to Section 9-bis.3 for fish at risk of scombrotoxin formation.”

Paragraph 21.1.1

Indonesia agrees with addition of the paragraph “For fish susceptible to scombrotoxin formation, retailers should measure fish internal temperatures and perform sensory examination of representative fish before accepting delivery, and retailers should ensure that fish are purchased from suppliers that use HACCP or similar systems to prevent histamine formation”

AGENDA 7: Proposed draft code of practice on food allergen management for food business operators

Paragraph 116

Indonesia agrees with the oral alternate text

Paragraph 145

Indonesia finds paragraph 145 is more appropriate compare with paragraph 144, however there is some changing needed as follows.

145. All food products and ingredients should be accompanied by or bear adequate information to ensure other food manufacturers or processors can be informed whether the food contains an allergen. This includes any applicable precautionary allergen labelling (e.g. “may contain”). Nevertheless, it’s desirable to avoid the systematic use of such statements, which can reduce the available food in the market for allergic consumers.

## Rationale

There may occur cross contamination here. How the FBOs prevented cross contamination does not occurred

## Paragraph 155

Indonesia agrees with adding Consumers should also be educated to maintain their intestinal health by consuming healthy food recommended by World Health Organization.

AGENDA 8: Proposed draft guidance for the management of (micro)biological foodborne crises/outbreaks

a. The use of either “Food safety emergency”, “Food safety incident” or “Food safety event”

including to what extent the guideline should cover events of contamination of foodstuffs without human illness.

Indonesia agrees with term “Food safety emergency”. This term is in line with WHO term and has been used widely.

b. The use of the term “biological” instead of “(micro)biological” in the headline and the scope.

Indonesia finds term “biological” foodborne more appropriate. The scope of the Draft should be widened to cover other biological hazards such as microbiological, toxin, parasite and allergen.

c. Which of the two definitions on foodborne outbreaks that should be used if any.

Indonesia finds, this alternate definition is more appropriate :

Alternate: [A foodborne outbreak is an incident in which two or more persons experience a similar illness after ingestion of a common food, and epidemiologic analysis implicates the food as the source of the illness]

d. The use of “rapid risk assessment” and/or “outbreak assessment”

Indonesia prefer the use of the term "rapid risk assessment". This would align with term “Food safety emergency” as mentioned above (a)