

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda items 3, 4(a), 7(a), 7(b), 7(c), 7(d), 8, 9, 13

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON PESTICIDE RESIDUES

54th Session

Beijing, P.R. China

26 June - 1 July 2023

Comments submitted by Indonesia

The Government of Indonesia would like to congratulate the 54th Session of the Codex Committee on Pesticide Residues for its work and take this opportunity to submit the following comments.

Agenda item 3

CX/PR 23/54/2

Matters referred to the Committee by the Codex Alimentarius Commission and/or its Subsidiary Bodies

Indonesia would like to reiterate our concerns about EtO and 2-CE raised during the 16th Session of the CCCF as stated in CRD 21. Provision of EtO and 2-CE must be established because they have the potential to cause health and trade issues. These substances are not always associated with pesticide residues. It can also come from other sources such as food additives carryover, pollutants (from its use as sterilizer, smoke, etc. that pollutes the environment), or natural occurrence. All of these sources have a potential to contaminate food. During the discussion in 16th Session of the CCCF, there were questions about whether EtO and 2-CE should be viewed as a contaminant, pesticide, or impurity in a food additive.

Indonesia is of the view that Codex should take the initial means to take up this work due to the increasing safety issue of the EtO contamination in international food trade. Indonesia encourages Codex to include EtO and 2-CE in the priority list to be immediately evaluated by FAO/WHO expert bodies and proposes JMPR in collaboration with JECFA to evaluate those substances.

Agenda item 4a

CX/PR 23/54/3

Matters arising from FAO and WHO

In accordance with the information given by FAO on the One Health framework, Indonesia is also encouraging integrated pest management as part of our effort to promote the sustainable development of agriculture.

In addition, Indonesia supports the reduction of food safety incidents caused by ethylene oxide and other contaminants as informed by INFOSAN secretariat.

Agenda item 7a

CX/PR 54/23/6

Revision of the Classification of Food and Feed: Class B – Primary Food Commodities of Animal Origin and Class E - Processed Foods of Animal Origin (All Types) (at Step 4)

Indonesia agrees on the proposed revision of the Classification of Food and Feed, especially:

- Class B (Primary Food Commodities of Animal Origin) on the additional type 10a: Miscellaneous Primary Food Commodities of Animal Origin, for inclusion of honey and other bee products; and
- Class E (Processed Foods of Animal Origin)

Due to it can be specified and classified based on the morphology and potential of similar pesticide residues in the commodities.

Agenda item 7b

CX/PR 23/54/7

Revision of the Classification of Food and Feed: Tables on examples of representative commodities for commodity groups in different types under Class B and Class E (at Step 4) (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 with the respective Tables 9 and 10 on examples of the selection of representative commodities.

Agenda item 7c

CX/PR 23/54/8

Revision of the Classification of Food and Feed: Portion of the commodity to which the MRLs apply, and which is analysed for Group 006 Assorted Tropical and Sub-tropical fruits - Inedible Peel and Group 023 Oilseeds

Group 006 Assorted Tropical and Sub-tropical fruits Inedible Peel

Indonesia is of the opinion that it is necessary to set different MRLs for portions of bananas and pineapples as follows:

- Banana flesh without skin
- Banana after removal of crown tissue and stalks.
- Pineapple flesh without skin
- Pineapple after removal of the crown

Group 023 Oilseeds and oilfruits

Indonesia agrees with the proposed revision of the portion of the commodity to which maximum residue limits applies (and which is analysed) for Group 023 Oilseeds and oilfruits.

Agenda item 7d

CX/PR 23/54/9

Revision of the Classification of Food and Feed: Review the Guidelines on Portion of Commodities to which MRLs apply and which is analysed (CXG 41-1993) with a comparison to the Classification of Food and Feed

Indonesia agrees to revoke the Guidelines on the portion of commodities to which MRLs apply and which is analyzed (CXG 41-1993) in order to eradicate redundancy, as these provisions have been incorporated into the Classification of Food and Feed (CXA 4-1989).

Agenda item 8

CX/PR 23/54/10

Coordination of work between CCPR and CCRVDF: Joint CCPR/CCRVDF working group on compounds for dual use

Indonesia agrees to the recommendation proposed by a Joint CCPR/CCRVDF EWG and the revision by CCRVDF26 regarding the coordination of work between CCPR and CCRVDF on compounds with dual use, e.g., developing a list of compounds with dual use as a pesticide and veterinary drug for which no or only one Codex MRL has been established; identifying dual-use compounds that have different Codex MRLs for a similar edible commodity of animal origin; and recommending on a case-by-case basis, a single, harmonised MRL(s) for the compound(s) and affected commodity(ies).

Agenda item 9

CX/PR 23/54/11

Management of Unsupported Compounds without Public Health Concern Scheduled for Periodic Review

Indonesia agrees on both proposals regarding managing unsupported compounds without public health concerns scheduled for periodic review and options for efficient data support that many stakeholders could address.

Agenda item 13

CX/PR 23/54/15

Enhancement of the operational procedures of CCPR and JMPR

Indonesia recalls its comment in CL 2022/75-PR to support EWG's recommendation for a proposed work plan and possible schedule to improve the operational procedures of CCPR and JMPR.