



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON CONTAMINANTS IN FOODS**

**Eleventh Session
Rio de Janeiro, Brazil, 3 – 7 April 2017**

To be held at the Windsor Marapendi Hotel, Rio de Janeiro, Brazil

Indonesia comments on agenda item 5, 6, 7, 8 and 10

Agenda Item 5 : Request for comments at Steps 3 and 6 on the proposed draft and draft revised maximum levels for lead in selected fruits and vegetables (fresh and processed) and other selected food categories in the General Standard for Contaminants and Toxins in Food and Feed (CODEX STAN 193-1995)

Name of product	Proposal	Indonesia Comment
Juices and nectars from berries and other small fruits	Consider lowering the ML for lead in juices and nectars exclusively from berries and small fruits from 0.05 mg/kg to 0.03 mg/kg, with the exception of juices and nectars derived exclusively from currants, elderberries, raspberries, and strawberries, which should be maintained at 0.05 mg/kg.	1. Indonesia supports ML of 0,03 mg/kg for Juices and nectars from berries and other small fruits
2. Jams (fruit preserves) and jellies:	Consider revising the ML for lead in jams (fruit preserves) and jellies from 1 mg/kg (currently at Step 5 at 0.1 mg/kg) to: <ul style="list-style-type: none"> • 0.2 mg/kg, or • 0.5 mg/kg, or • If agreement cannot be reached on a revised ML, consider whether it would be preferable to revoke the current ML of 1.0 mg/kg for jams and jellies than to retain an ML of 1.0 mg/kg that is inconsistent with other MLs for lead in the GSCTFF. 	3. Indonesia supports ML of 0,5 mg/kg for jams (fruit preserves) and jellies
4. Fish	0.3 mg/kg	5. Indonesia supports ML of 0,3 mg/kg for fish.

Agenda Item 6 : Request for comments at Step 3 on the proposed draft MLs for cadmium in chocolate and cocoa-derived products

Name of Product	Total dry solid of cocoa (%)	Proposed ML Mg/kg	Indonesian Comment
Milk chocolate ≥ 25 Family milk chocolate ≥ 20 Milk chocolate couverture ≥ 25 Table chocolate ≥ 20 Milk chocolate vermicelli/milk chocolate flake ≥ 20	$\leq 30\%$	0.1	Indonesia supports the proposed ML of 0,1 mg/kg
Dry mixtures of cocoa and sugars: Sweetened cocoa, sweetened cocoa powder, drinking chocolate ≥ 25 , Sweetened cocoa mix, Sweetened mixture with cocoa ≥ 20 , sweetened cocoa- flavored mix ≥ 20		0.65	Indonesia supports the proposed ML of 0,65 mg/kg
Chocolate ≥ 35 Gianduja chocolate ≥ 32 Semi – bitter chocolate para mesa ≥ 30 Chocolate Vermicelli/chocolate flakes ≥ 32 Bitter table chocolate ≥ 40	$>30\%-50\%$	0.3	Indonesia supports the proposed ML of 0,3 mg/kg
Chocolates and products with declared cocoa content more than 50% and less than 70%	$>50\%-70\%$	0.6	Indonesia supports the proposed ML of 0,6 mg/kg
Chocolates and products with declared cocoa content more than 70%	$>70\%$	0.8	Indonesia supports the proposed ML of 0,8 mg/kg

Agenda item 7 : Request for comments at Step 3 on the proposed draft Code of practice for the prevention and reduction of arsenic contamination in rice

Proposed Draft Code of Practice for the Prevention and Reduction of arsenic Contamination in Rice	Indonesia comments
1.1 [Arsenic is a toxic metalloid and inorganic arsenic is identified as a human carcinogen.] Soil in rice paddy fields can contain arsenic naturally and also can be polluted by irrigation water, rain and air that are contaminated with arsenic from anthropogenic sources such as mining and smelting and materials for agricultural and livestock production. Rice plants absorb arsenic from soil, especially when soil is in reducing conditions, and accumulate it in grain and straw. Rice may contain inorganic arsenic (arsenite and arsenate) and organic arsenic (monomethylarsonic acid and dimethylarsinic acid).	Indonesia would ask for clarification on the term “reducing condition” in line 5 of this section.
1.2 The effectiveness of measures in the Code of Practice can vary depending on local environmental conditions (e.g. soil properties, management regimes and, temperature). Field studies should be conducted to identify measures that are feasible	Indonesia proposes to replace the term “management regimes” with “water management” as referred to in this section is more to water management

<p>and effective for local or regional conditions. If possible, the field studies should be conducted across crop years because arsenic uptake in rice crops is highly variable from year to year. Implementation of measures that are likely to result in insufficient supply of rice to the market should be avoided.</p>	
<p>3. DEFINITIONS</p>	
<p>3.7 Flooded condition</p>	<p>Indonesia proposes to replace the term “flooded” with “anaerobic” to be consistent with the use of the term next.</p>
<p>3.8 Aerobic condition of soil in a paddy field where rice is grown is [a condition that a paddy field is more aerobic than flooded condition.] [in well drained, [non-puddled][non-flooded] and unsaturated soils.]</p>	<p>Indonesia propose to delete [a condition that a paddy field is more aerobic than flooded condition.] and [non-puddled]</p> <p>So the following sentence become : 3.8 <i>Aerobic condition</i> of soil in a paddy field where rice is grown is in well drained, non-flooded and unsaturated soils.</p>
<p>3.9 Intermittent ponding means a variety of possible water management practices in which a paddy field is alternately in flooded and aerobic/non-flooded condition.</p>	<p>To be consistent with the use term of anaerobic, so we propose to replace the term “flooded” with “anaerobic”</p>
<p>4. MEASURES TO PREVENT AND REDUCE ARSENIC CONTAMINATION</p>	
<p>[4.1 Inorganic arsenic is the most toxic form of arsenic. Measures to reduce arsenic (e.g., flooding/aerobic growth) may affect inorganic and organic arsenic differently. The most important goal is to reduce inorganic arsenic.]</p>	<p>Open the square bracket and to be consistent with the use term of anaerobic, so we propose to replace the term “flooding” with “anaerobic”</p>
<p>4.3.2 - Soil; • Identification of paddy fields in which arsenic concentration in soil is high and/or where rice with high concentration of [inorganic] arsenic is produced</p>	<p>Indonesia proposes to delete the term inorganic. So the sentence become : Identification of paddy fields in which arsenic concentration in soil is high and/or where rice with high concentration of arsenic is produced</p>
<p>4.4.2 Aerobic conditions or intermittent ponding during rice production, instead of flooded conditions, may reduce arsenic concentration in rice. Studies have shown aerobic soils reduce arsenic uptake as compared to flooded soils even when there are high amounts of arsenic in the soil. Intermittent ponding can also reduce availability of arsenic for plant uptake compared to flooded soils.</p>	<p>To be consistent with the use term of anaerobic, so we propose to replace the term “flooded” with “anaerobic”</p>
<p>4.4.3 However, if cadmium concentrations in rice are of concern in a geographic region, risk managers should ensure that implementation of arsenic control measures would not increase cadmium concentrations in rice to unsafe levels³. If appropriate, risk managers may consider implementation of source directed measures for cadmium reduction in soil, water or fertilisers that are used for rice production⁴.</p>	<p>Due to the presence of arsenic and cadmium opposite, and this COP describes the arsenic reduction, Indonesia is of the view that the explanation of the contradictive of the presence of arsenic and cadmium should not be explained in this COP. So we propose to delete this section.</p>
<p>5. MONITORING</p>	
<p>5.1 The effectiveness of measures should be monitored {by} [to assess] arsenic concentration in</p>	<p>open square bracket “by” and delete the term “to assess”</p>

rice.	
5.2 If agricultural land or ground waters used for growing rice are widely contaminated by natural sources, non-point source or {past} {historical} activities, monitoring of arsenic concentrations in soil and/or irrigation water may also be necessary.	open square bracket “historical” and delete the term “past”
6. RISK COMMUNICATION	
6.1 National or relevant food control authorities should share information on risks and benefits of consuming polished and/or husked rice among stakeholders in the light of arsenic concentrations and nutrient components, {noting that there are health benefits associated with consumption of husked rice} [considering concerns regarding arsenic concentrations and the nutritional benefits of rice consumption].	Delete the sentence [noting that there are health benefits associated with consumption of husked rice] and open the square bracket [considering concerns regarding arsenic concentrations and the nutritional benefits of rice consumption] with addition of “husked” before the term “rice” The sentence as follow : 6.1 National or relevant food control authorities should share information on risks and benefits of consuming polished and/or husked rice among stakeholders in the light of arsenic concentrations and nutrient components, considering concerns regarding arsenic concentrations and the nutritional benefits of husked rice consumption.
6.3 {It is known that during polishing process more arsenic is removed from husked rice that contains higher concentration of arsenic and that husked rice polished at the higher polishing rate results in polished rice with lower arsenic concentration.} Polished rice contains less inorganic arsenic than husked rice, because polishing removes inorganic arsenic in the bran layer. [Husked rice polished at the higher polishing rate results in polished rice with lower arsenic concentrations.] {Thus, husked rice containing high concentration of arsenic can} [may] be distributed and safely consumed after it is appropriately processed into polished rice.	The sentence as follow : 6.3 It is known that during polishing process more arsenic is removed from husked rice that contains higher concentration of arsenic and that husked rice polished at the higher polishing rate results in polished rice with lower arsenic concentration. Polished rice contains less inorganic arsenic than husked rice, because polishing removes inorganic arsenic in the bran layer. Thus, husked rice containing high concentration of arsenic may be distributed and safely consumed after it is appropriately processed into polished rice.
7.1.6 Effort to remediate arsenic in soil besides can used chemical compounds also used biologic agent (using microbe and hyper accumulator plant which tolerance of arsenic) that have ability to decrease arsenic in soil.	Proposal Indonesia

Agenda Item 8 : Request for comments at Step 3 on the proposed draft ML for AFT in RTE peanuts

Indonesia supports the proposed ML of 15 µg/kg for ready to eat peanuts

Agenda item 10 : Request for comments at Step 3 on the proposed draft Code of Practice for the Prevention and Reduction of Mycotoxin Contamination in Spices

Proposed Draft Code of Practice for the Prevention and Reduction of Mycotoxins in Spice	Indonesia comment
1. The production, processing, packing and distribution of spices can be very complex. These processes can span long periods of time and possibly include a wide range of establishments. Dried product processing generally involves cleaning (e.g. culling, sorting to remove debris), grading, sometimes soaking, slicing, drying, and	Para #1 line 1: To replace the term “packing” with “packaging” to be consistent with the title of section 2.3.5 Packaging Para #1 line 5 : To replace the term “ packing/repacking ” with

<p>on occasion grinding/cracking. Some spices are also treated to mitigate microbial contamination. Processing and packing/repacking may also take place in multiple locations over long periods, since spices are prepared for different purposes.</p>	<p>“packaging/repackaging”</p>
<p>11. It is also recommended to encourage research studies on the factors affecting the formation of mycotoxins.</p>	<p>Indonesia is of the view that this paragraph is not related directly to the operational of COP, so we proposes to delete this paragraph.</p>
<p>48. Drying methods: 1. Sun drying a. Drying should not occur directly on the ground. Use trays, tarpaulins, bamboo mats or drying yards, and make sure that these are clean as it is known that mould spores from previous use could recontaminate product during drying. Techniques for cleaning all of the above should be taught to farmers. Never use cow dung paste in bamboo mats to fill the holes.</p>	<p>Para # 48. 1. A : To add the words “of unhygienic materials” after the word “use” to make more clearly. The sentence as follow : “Never use of unhygienic materials (such as cow dung paste) to fills the holes of bamboo mats.”</p>
<p>48. Drying methods: 2. Controlled drying</p>	<p>Para # 48. 2. : Inconsistence bulleting system is applied (Need correction)</p>
<p>2.3.3 Storage after Drying and Cleaning</p>	<p>There is no recommendation on the temperature and the humidity for the storage. Propose to include the use of dehumidifier and or air condition.</p>
<p>76. Packing activities can occur in the growing/harvest area. Such packing operations should include the same sanitary practices, where practical, as packing spices in establishments or should be modified as needed to minimize risks. To prevent germination and growth of spores, the products must be dried to a safe moisture level prior to packing.</p>	<p>To replace the term “packing” with “packaging” to be consistent</p>