

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 4.4, 5, 7.1, 10

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Forty-eighth Session

Rome, Italy

10-14 November 2025

COMMENTS OF INDONESIA

AGENDA ITEM 4.4

CX/CAC 25/48/6; CX/CAC 25/48/6 Add.1

Work of the Codex Committee on Contaminants in Foods (CCCCF)

Part 1 – Standards and related texts submitted for final adoption

ML of 2.0 mg/kg for lead in culinary herbs, dried for inclusion in CXS 193-1995

Indonesia supports the adoption of an ML of 2.0 mg/kg for lead in dried culinary herbs for inclusion in CXS 193-1995.

AGENDA ITEM 5

CX/CAC 25/48/10

Proposal for New Work

Part A – New work proposals submitted by active subsidiary bodies for approval by CAC48

New work on proposed draft food additive provisions of the GSFA

Indonesia supports the approval of new work on proposed draft food additive provisions for the GSFA, particularly concerning the inclusion of the Codex Standard CXS 249-2006 in column 5 of Table 3 for the food additive glycerol.

Priority list of pesticides for evaluation by JMPR

Indonesia supports the approval of the Priority List of Pesticides for evaluation by JMPR.

The conversion of the Regional standard for laver products (Asia) (CXS 323R2017) into an international standard

Indonesia supports the proposal to convert the Regional Standard for Laver Products (Asia) (CXS 323R-2017) into an international standard.

Part B – New work proposals not falling under the purview of active subsidiary bodies

Proposal for development of a standard for pasteurized camel milk

Indonesia would like to resubmit its comments in response to CL 2025/50-CAC, as follows:

Indonesia wishes to express its appreciation to the United Arab Emirates and the other co-author member countries for preparing the discussion paper and project document on the development of a Commodity Standard for Pasteurized Camel Milk. Indonesia is of the view that the documents provided are comprehensive and in accordance with the criteria set out in the *Procedures for the Elaboration of Codex Standards and Related Texts*. Considering the many beneficial properties and unique characteristics of camel milk, which distinguish it from other types of milk, it would be highly advantageous for Codex to proceed with the elaboration of a commodity standard for this product.

However, Indonesia suggests that the scope of the standard to be developed should be broadened to include not only pasteurized camel milk but also other widely traded camel milk products, such as camel milk powder. This would ensure the standard remains relevant to global trade dynamics.

AGENDA ITEM 7.1

CX/CAC 25/48/12 Rev.2

Other matters relating to Codex subsidiary bodies

A – Proposed amendment of the Standard for kimchi (CXS 223-2001)

Indonesia notes that Codex currently has an existing standard, the Standard for Pickled Fruits and Vegetables (CXS 260-2007). By definition, the products covered by this standard possess characteristics that may closely resemble those of kimchi.

This similarity arises because pickled fruits and vegetables can also be produced using cabbage—which is the primary raw material for kimchi—and both products undergo a fermentation process.

Therefore, it is essential for Codex to clearly delineate the distinctions between these two product categories. This clarification is necessary to prevent a single product from being inconsistently labelled or misidentified, thereby preventing consumer confusion.

B – Matters related to the Codex Committee on Fish and Fishery Products

Indonesia agrees that the CCFFP should remain active and work by correspondence for the time being, in order to review the standards within its scope of work.

C – Joint electronic working group of the Codex Committee on Pesticide Residues (CCPR) and the Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF)

Indonesia agrees with the proposal to convene a virtual meeting of the Joint EWG of CCPR and CCRVDF to facilitate discussion and resolutions of issues that constitute the mandate of the Joint EWG.

AGENDA ITEM 10

CX/CAC 25/48/15

Matters arising from FAO and WHO

Indonesia wishes to express its appreciation for the ongoing efforts of both the FAO and WHO to enhance global food safety and provide critical guidance to Member Countries.

In reference to the development of the forthcoming WHO guidance on the consumption of "Ultra-processed" foods (UPF), Indonesia submits the following considerations:

1. Critical Need for a Clear Definition

Indonesia emphasizes that the utility and scientific integrity of this guidance are critically dependent on a clear, scientifically-grounded, and unambiguous definition of the term "Ultra-processed food". A precise definition is necessary to ensure the guidance remains credible, science-based, and practical for implementation by Member Countries.

2. Risk of Miscategorization and Consumer Misperception

We hold significant concern that without such a precise definition, the UPF category risks becoming overly broad and imprecise. This ambiguity could lead to significant consumer misperception and the miscategorization of food products that are, in fact, safe, nutritious, and play a valuable role in healthy diets. The primary goal must be to provide guidance that accurately reflects food safety and nutritional science, not to inadvertently classify safe and healthy products as "unsafe," or even worse, "unhealthy". The guidance should therefore avoid creating confusion that could undermine public trust in safe food products or discourage evidence-based public-health practices.

3. Essential Distinction Between Processing and Formulation

To achieve the necessary clarity, Indonesia strongly emphasizes that the definitional framework must make a clear and explicit distinction between processing methods and product formulation.

- Processing (such as pasteurization, canning, or nutrient fortification) is an essential public-health measure. Such processing is essential for ensuring food safety by destroying or controlling pathogens, extending shelf-life to prevent spoilage and waste, and helps maintain or enhance nutritional value.

These functions are particularly critical for Indonesia — an archipelagic country where logistical constraints and geographic dispersion make reliable cold-chain distribution and timely food delivery challenging. In such contexts, appropriate food processing is indispensable for ensuring the safety, nutritional adequacy, and accessibility of foods across diverse regions.

- Formulation refers to the specific composition and ingredients used in a food product, including the type and quantity of added sugars, fats, salts, flavorings, and other functional or sensory components. Formulation determines the nutritional profile of a product and influences its contribution to a healthy or unbalanced diet. Therefore, the development of the definition should carefully consider this distinction to ensure that any classification appropriately reflects the role of formulation, rather than the mere act of processing itself.

Mixing these two distinct concepts in the definition could result in inaccurate classification and misleading guidance for both consumers and policymakers. A product that undergoes processing for safety should not be categorized identically to a product with a poor nutritional formulation. Therefore, a definition that maintains a clear separation between processing and formulation is essential to ensure that the guidance remains scientifically sound, practical, and effective in supporting public-health objectives. Indonesia is seriously concerned that failure to make this distinction could lead to misinterpretation and unintended negative implications for public health.

In summary, Indonesia supports the overarching goal of promoting healthy diets but urges that the development of UPF guidance be anchored in a precise definition that clearly differentiates processing from formulation. This will ensure that the guidance remains science-based, consistent with Codex principles, and correctly interpreted by consumers and policymakers. Indonesia is seriously concerned that failure to make this distinction could lead to misinterpretation and unintended negative implications for public health.