

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda item 4.4, 4.5, 4.6, 4.7, 6, 13, and 14

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX ALIMENTARIUS COMMISSION

#### Forty-fifth Session

FAO Headquarters, Rome, Italy

21-25 November and 12-13 December 2022

#### Comments of Indonesia

#### AGENDA ITEM 4.4

#### CX/CAC 22/45/6

**Work from the Codex Committee on Fresh Fruits and Vegetables (CCFFV) for Adoption or Approval by the Commission**

#### Part 1 – Standards and related texts submitted for final adoption

**1. Proposed draft standard for onions and shallots**

Indonesia supports the adoption of Proposed draft standard for onions and shallots at Step 5/8.

**2. Proposed draft standard for berry fruits**

Indonesia supports the adoption of Proposed draft standard for berry fruits at Step 5/8.

**3. Proposed draft standard for fresh dates**

Indonesia supports the adoption of Proposed draft standard for fresh dates at Step 5/8.

#### Part 2 – Proposals to elaborate new standards and related texts

**4. Proposal for new work on development of Standard for Castilla lulo**

Indonesia would like to recall the discussion at the CCFFV22 meeting which highlighted the need for further information on production and trade data from other producing countries and therefore the committee agreed to request Colombia to revise the proposal by providing more trade information and submit it directly to CCEXEC.

However, based on the CCEXEC report (Para 10), It stated that “CCEXEC83, while recognizing the need to consider the standard development needs of developing countries and challenges they may face in data collection, underlined the importance of a critical assessment by subsidiary bodies on new work proposals against the criteria in the PM to ensure they were substantively complete before such proposals were forwarded to CCEXEC for critical review”.

With this regard, Indonesia would like to seek clarification on the result of CCEXEC’s critical review. Indonesia is of the view that if the trade data provided in the proposal still does not indicate that Castilla lulo is currently traded globally (data indicated that the product is only trade in limited regions), the proposal can be directed to be a regional standard, with the possibility to revise and to elevate it into a worldwide standard in the future, when the trade has developed as supported by the global trade data.

**5. Proposal for new work on development of Standard for fresh curry leaves**

Indonesia supports the proposal on the development of Standard for fresh curry leaves to be adopted as new work.

**AGENDA ITEM 4.5**

CX/CAC 22/45/7

Work from the Codex Committee on Contaminants in Food (CCCF) for adoption or approval by the Commission

**Part 1 – Standards and related texts submitted for final adoption**

1. **Code of practice for the prevention and reduction of cadmium contamination in cocoa beans**  
Indonesia supports the adoption of Code of practice for the prevention and reduction of cadmium contamination in cocoa beans at Step 8.
2. **Maximum levels for methylmercury in orange roughy and pink cusk eel**  
While not object the adoption of the MLs for methylmercury in orange roughy and pink cusk eel, Indonesia would like to express its particular concerns to the commission as well as to FAO/WHO, to the potential for disruption in international trade, particularly due to the varying competencies of each member country in conducting this methylmercury analysis. Therefore, to ensure that the MLs adopted can be implemented properly, global collaborations is needed to ensure that there is no competency gap in method of analysis.
3. **Maximum levels for total aflatoxins in maize grain, destined for further processing; flour meal, semolina and flakes derived from maize; husked rice; polished rice; sorghum grain, destined for further processing; cereal-based food for infants and young children (excluding foods for food aid programs), and cereal based food for infants and young children for food aid programs**  
Indonesia supports the adoption of MLs of 5 µg/kg for cereal-based food for infants and young children; and MLs of 5 µg/kg for polished rice

**Part 2 – Standards and related texts submitted for adoption at Step 5**

4. **Code of practice for prevention and reduction of mycotoxin contamination in cassava and cassava-based products**  
Indonesia supports the adoption of Code of practice for prevention and reduction of mycotoxin contamination in cassava and cassava-based products at Step 5.

**Part 3 – Work proposed for discontinuation**

5. **Maximum levels for lead in fresh eggs, dried garlic and molasses**  
Indonesia supports the discontinuation of the work on the establishment of the maximum levels for lead in fresh eggs, dried garlic and molasses.

**AGENDA ITEM 4.6**

CX/CAC 22/45/8

Work from the Codex Committee on Pesticides Residues (CCPR) for adoption or approval by the Commission

**Part 1 – Standards and related texts submitted for final adoption**

1. **Guidelines for the recognition of active substances or authorized uses of active substances of low public health concern that are considered exempted from the establishment of Codex MRLs or do not give rise to residues**  
Indonesia supports the adoption of Guidelines for the recognition of active substances or authorized uses of active substances of low public health concern that are considered exempted from the establishment of Codex MRLs or do not give rise to residues at Step 8.
2. **MRLs for different combinations of pesticide/commodity(ies)**  
Indonesia supports the adoption of MRLs for different combinations of pesticide/commodity(ies) as listed in the REP22/PR Appendix II at Step 5/8.

**3. Revision of Classification of Food and Feed (CXA 4- 1989): definitions for edible offal, fat, meat and muscle, including the definitions for the portion of the commodity to which MRLs apply and which is analyzed for fat and muscle**

Indonesia supports the adoption of definition for edible offal, meat, muscle and fat, including definitions for the portion of the commodity to which MRL apply and which is analyzed for fat and muscle

**4. Revision of the Classification of Food and Feed (CXA 4- 1989): Consequential amendment to Class D, Processed Food of Plant Origin. Inclusion of additional commodities for citrus fruits pulps (dried) and oils (edible) and soya flour**

Indonesia supports the adoption of consequential amendment to Classification of Food and Feed, Class D, related to the inclusion of additional commodities for certain citrus fruits pulps (dried) and oils (edible) as well as soya flour

**Part 2 – Work proposed for discontinuation**

**5. MRLs for different combinations of pesticides/commodity(ies) in the Step Procedure recommended for withdrawal (discontinuation)**

Indonesia supports the discontinuation of work on the establishment of MRLs for different combinations of pesticides/commodity(ies) as listed in the REP22/PR Appendix VI.

**Part 3 – Codex standards and related texts proposed for revocation**

**6. CXLs for different combinations of pesticide/commodity(ies) proposed for revocation**

Indonesia supports the revocation of CXLs for different combinations of pesticide/commodity(ies) as listed in the REP22/PR Appendix III.

**7. Guidelines on the use of mass spectrometry for the identification, confirmation and quantitative determination of residues (CXG 56- 2005)**

Indonesia supports the revocation of the Guidelines on the use of mass spectrometry for the identification, confirmation and quantitative determination of pesticide residues considering the adequacy of CXG 90-2017 *Guidelines on Performance Criteria for Methods of Analysis for the Determination of Pesticide Residues in Food and Feed* with regard to mass spectrometry.

**AGENDA ITEM 4.7**

**CX/CAC 22/45/9**

**Work from the Codex Committee on Spices on Culinary Herbs (CCSCH) for adoption or approval by the Commission**

**Part 1 – Standards and related texts submitted for final adoption**

**1. Draft Standard for dried floral parts – Saffron**

Indonesia supports the adoption of Draft Standard for dried floral parts – Saffron at Step 8.

**2. Draft Standard for dried seeds – Nutmeg**

Indonesia supports the adoption of Draft Standard for dried seeds – Nutmeg at Step 8.

**3. Proposed draft Standard for dried or dehydrated chilli pepper and paprika**

Indonesia supports the adoption of Proposed draft Standard for dried or dehydrated chilli pepper and paprika at Step 5/8.

**4. Amendments to the labelling provisions of non-retail containers in the eight existing spices and culinary herbs (SCH) standards**

Indonesia supports the adoption of the amendments to the labelling provision of non-retail containers in the eight existing spices and culinary herbs standards as listed in the REP22/SCH Appendix II Part A

**Part 2 – Standards and related texts submitted for adoption at Step 5****5. Proposed draft Standard for dried small cardamom**

Indonesia supports the adoption of Proposed draft Standard for dried small cardamom at Step 5.

**6. Proposed draft Standard for spices derived from dried fruits and berries (Part A - Allspice, Juniper berry, Star anise)**

Indonesia supports the adoption of Standard for spices derived from dried fruits and berries (Part A – Allspice, Juniper berry, Star Anise at Step 5.

**AGENDA ITEM 6****CX/CAC 22/45/13****Other matters related to Codex Subsidiary Bodies****Proposal for revision of the Standard for Kimchi (CXS 223-2001)**

Since the Codex Standard for Kimchi (CXS 223-2001) was last amended in 2017 and considering the possibility of developments/innovations related to the use of raw materials and/or fermentation technology which will have an impact on changes in the scope, definition, food additives and other matters contained in the standard, Indonesia is of the view that Codex should take initial means to further process the new work proposal to revise the standard in accordance with the rules stated in Codex Procedural Manual. Indonesia is of the view that the information contained in the proposed project document is clear and sufficient and already consistent with the criteria in the Codex Procedural Manual.

Related to the section 3 the main aspects to be covered of the project document, Indonesia suggests that the proposed change of definition not only focus on modify the common and/or commodity name of the “Chinese cabbage” as the main ingredient of Kimchi, but also opening up possibilities of using other species/types of cabbage as the main ingredient, considering that currently kimchi is also produced in other regions which only have other species/type of cabbage.

**New work proposal for the development of principles and guidelines on the use of remote audit and verification in regulatory frameworks**

Indonesia would like to express its appreciation to Chair and co-chair for working up this project document. Indonesia supported the preparation of this document. This project document also has fulfilled the criteria contained in the Codex Procedural Manual, particularly regarding Proposals to Undertake New Work or to Revise a Standard and Criteria for the Establishment of Work Priorities.

Guidelines related to remote audit and verification can be useful for competent authorities as a complement to physical/onsite audit activities that have been practicing so far. In practicing remote audit and verification, there are several things that need to be considered, such as information technology, completeness of documents, track record of company in certification and the competency of both auditors and auditees.

In carrying out a remote audit as complement for onsite audit, remote audit can be applied such as only for low-risk product, renewal certificate, surveillance and etc.

Challenges that may occur in conducting remote audit such as natural land conditions (which might make signaling difficult), ICT infrastructure, Human Resources capabilities, confidential documents (related to data security), time differences between auditors and auditees (auditors should adjust to auditees), there are also several aspects that require organoleptic assessment or evaluation like senses (smell, taste etc.), time constraints (limit) and language differences.

**AGENDA ITEM 13****CX/CAC 22/45/20****60<sup>th</sup> Anniversary of the Codex Alimentarius Commission: 1963 – 2023**

Indonesia would like to express its appreciation to Codex for the work done for almost 60 years in developing scientifically-based food standards which have been used as reference in the international food trade and in many cases serve as a basis for national standard or regulation.

In the past few years, Indonesia has been actively involved in the standard development process as well as in the leadership in Codex works. So, we will use this opportunity to plan for our active and effective participation and also contribution in the future works of Codex.

Indonesia has several ministries/agencies that have authority in the food sector. In order to support the celebration of the achievement of Codex for almost 60 years, Indonesia will hold a series of events involving all stakeholders including competent authorities, experts, food business operator, and also consumer, to build awareness of Codex and of course food safety, and to engage high-level political support for Codex work. This undeniably will have major impact on the food safety system in Indonesia.

Indonesia will share information on these activities through Codex Secretariat and will also involve the Codex family in these activities, as we have done before.

#### **AGENDA ITEM 14**

#### **CX/CAC 22/45/21**

#### **Participation of the European Union as Adviser to the Member for Europe in the Executive Committee of the Codex Alimentarius Commission**

Indonesia would like to thank FAO and WHO Legal Offices for preparing a very precise and detailed document related to the participation of EU as adviser to the member for Europe in the CCEXEC meeting.

Indonesia noted that according to the rules of procedures, Executive committee shall consist of the Chairperson and the Vice-chairpersons of the Commission, the Regional Coordinators, and Members elected on the geographical basis. In addition, we also noted that a Member organization shall not be eligible for election or designation, nor to hold office in the Commission or any subsidiary body. So, in our understanding, EU is not a member of CCEXEC and therefore could not participate in CCEXEC in its own name.

In addition, Indonesia would like to highlight Para 29 of the document that citing the results of CAC18 meeting that adopted recommendation from the CCGP on the composition of the Executive Committee. It is said that "*The delegate of member may be accompanied by not more than two advisors from the same geographic location*". However, we could not find out these rules in the Codex Procedural Manual.

Indonesia is of the view that the absence of detailed rules regarding who may become advisors will continue to cause problems and questions regarding who is entitled to attend the CCEXEC meetings. Therefore, Indonesia proposes the Commission to consider this matter and to take initial means in order to solve the problems.