

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX ALIMENTARIUS COMMISSION

**Forty-sixth Session**

**FAO Headquarters, Rome, Italy**

**27 November - 2 December 2023**

### COMMENTS OF INDONESIA

#### ITEM 3: AMENDMENTS TO THE PROCEDURAL MANUAL

Indonesia supports the approval of the proposed amendments to the Codex Procedural Manual (Section 6, Section 2 and Editorial changes to Section 2, Section 3, and Section 7).

#### ITEM 4.1: FAO/WHO COORDINATING COMMITTEE FOR ASIA

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

**Amendment of the labelling provisions for non-retail containers in the Regional Standards for Fermented Soybean Paste (Asia) (CXS 298R-2009) and Edible Sago Flour (Asia) (CXS 301R-2011), and the Standards for Gochujang (CXS 294-2009) and Chilli Sauce (CXS 306-2011) to align with the General Standard for the Labelling of Non-retail Containers of Foods (CXS 346- 2021)**

Indonesia supports the adoption of the proposed amendment of the labelling provisions for non-retail containers in the several Regional Standards.

#### ITEM 4.3: CODEX COMMITTEE ON FOOD HYGIENE

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

##### 1. **Guidelines for the Safe Use and Reuse of Water in Food Production and Processing (General Section and Annex I)**

Indonesia supports the adoption of the Guidelines for the Safe Use and Reuse of Water in Food Production and Processing (General Section and Annex I) at Step 5/8.

##### Part 2 – Proposals to undertake new work or revise a standard

##### 2. **New work proposal on the development of Guidelines for food hygiene control measures in traditional markets for food**

Indonesia supports the proposal on the development of Guidelines for food hygiene control measures in traditional markets for food to be adopted as new work.

##### 3. **Proposed Revision of the Guidelines on the Application of the General Principles of Food Hygiene to the control of Pathogenic Vibrio Species in Seafood (CXG 73-2010)**

Indonesia supports the proposed revision of the Guidelines on the Application of the General Principles of Food Hygiene to the Control of Pathogenic Vibrio Species in Seafood to be adopted as new work.

**ITEM 4.5: CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS****Part 3 – Work proposed for discontinuation****MRLs for Ivermectin (sheep, pigs and goats – fat, kidney, liver and muscle)**

Indonesia supports the discontinuation of the work on MRLs for Ivermectin (sheep, pigs and goats – fat, kidney, liver and muscle).

**ITEM 4.7: CODEX COMMITTEE ON FOOD ADDITIVES****Part 1 – Standards and related texts submitted for final adoption****Inclusion of the provision for trisodium citrate (INS 331(iii)) in FC 01.1.1 in the General Standard for Food Additives (GSFA) (CXS 192-1995)**

Indonesia supports the adoption at Step 8 of the provision for trisodium citrate (INS 33 (iii)) to be included in FC 01.1.1 in the GSFA.

**ITEM 4.8: CODEX COMMITTEE ON CONTAMINANTS IN FOODS****Part 1 – Standards and related texts submitted for final adoption****1. Code of Practice for prevention and reduction of mycotoxin contamination in cassava and cassava-based products**

Indonesia supports the adoption of the Code of Practice for prevention and reduction of mycotoxin in cassava and cassava-based products at Step 8.

**2. ML for total aflatoxins in dried chilli and nutmeg, and ML for ochratoxin A in dried chilli, paprika, and nutmeg**

Indonesia supports the adoption of ML for total aflatoxin in nutmeg. However, for total aflatoxin and ochratoxin A in dried chilli, due to the limited data, Indonesia proposes that the statement “these MLs could be reviewed within 3 years if sufficient data is available” as agreed during the Committee session should be recorded in the CAC report.

**ITEM 4.9: CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS****Part 2 – Proposals to undertake new work or revise a standard****Review and update of Principles for Traceability/Product Tracing as a Tool within a Food Inspection and Certification System (CXG 60-2006)**

Indonesia supports the proposal of review and update of Principles for Traceability/Product Tracing as a Tool within a Food Inspection and Certification System to be adopted as new work.

**ITEM 4.10: CODEX COMMITTEE ON FOOD LABELLING****Part 1 – Standards and related texts submitted for adoption at Step 5****1. Guidelines on the Provision of Food Information for Pre-packaged Foods to be Offered via E-Commerce**

Indonesia supports the adoption of the Guidelines on the Provision of Food Information for Pre-packaged Foods to be Offered via E-commerce at Step 5.

## 2. Guidelines on the Use of Technology to Provide Food Information

Indonesia supports the adoption of the Guidelines on the Use of Technology to Provide Food Information at Step 5.

### Part 2 –Proposals to undertake new work or revise a standard

## 3. Amendments to the General Standard for the Labelling of Pre-packaged Foods (CXS 1-1985): Labelling of pre-packaged foods in joint presentation and multipack formats

Indonesia supports the proposal of the Amendments to the General Standards for the Labelling of Pre-packaged Foods: Labelling of pre-packaged foods in joint presentation and multipack formats to be adopted as new work.

## ITEM 4.11: CODEX COMMITTEE ON METHODS OF ANALYSIS AND SAMPLING

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

## 1. Methods of analysis / performance criteria / sampling plans for provisions in Codex standards (CXS 234–1999, CXS 193-1995)

Indonesia supports the adoption of Methods of analysis/ performance criteria/ sampling plans for provisions in Codex standards.

## 2. Revised General Guidelines on Sampling (CXG 50-2004)

Indonesia supports the adoption of Revised General Guidelines on Sampling at Step 8.

### Part 2 – Existing Codex standards and related texts proposed for revocation

## 3. Methods of analysis for provisions in Codex standards (CXS 234–1999)

Indonesia supports the revocation of the Methods of analysis for provisions in Codex Standards.

## 4. General Methods of Analysis for Contaminants (CXS 228- 2001)

Indonesia supports the revocation of the Methods of Analysis for Contaminants.

## ITEM 4.12: CODEX COMMITTEE ON PESTICIDE RESIDUES

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

## 1. MRLs for different combinations of pesticide/commodity(ies)

Indonesia supports the adoption of MRLs for different combinations of pesticide/commodity(ies) at Step 5/8.

## 2. Consequential amendments to the CXLs for peppers groups/subgroups to cover okra, martynia and roselle

Indonesia supports the adoption of consequential amendments to the CXLs for peppers groups/subgroups to cover okra, martynia and roselle.

## 3. Revision of the Classification of Food and Feed (CXA 4-1989) and consequential amendment to the Principles and Guidance on the Selection of Representative Commodities for the Extrapolation of MRLs for Pesticides to Commodity Groups (CXG 84- 2012) (completion of Class B - Primary commodities of animal origin and Class E – Processed commodities of animal origin and corresponding Table 9 and Table 10 of representative commodities)

Indonesia supports the adoption of the revision of the Classification of Food and Feed and consequential amendment to the Principles and Guidance on the Selection of Representative Commodities for the Extrapolation of MRLs for Pesticides to Commodity Groups at Step 5/8.

**4. Consequential amendment to the Classification of Food and Feed (CXA 4-1989) (revised definitions for the portion of the commodity to which MRLs apply and which is analyzed for Group 006 – Assorted tropical and subtropical fruits of inedible peel and Group 023 – Oilseeds and oilfruits)**

Indonesia supports the adoption of consequential amendment to the Classification of Food and Feed (CXA 4-1989) (revised definitions for the portion of the commodity to which MRLs apply and which is analyzed for Group 006 – Assorted tropical and subtropical fruits of inedible peel and Group 023 – Oilseeds and oilfruits).

**5. Consequential amendment to the: Classification of Food and Feed (CXA 4-1989) (additional commodity groups in Class A – Primary food commodities of plant origin and Class D – Processed commodities of plant origin; and Principles and Guidance on the Selection of Representative Commodities for the Extrapolation of MRLs to Commodity Groups (CXG 84-2012) (revised Group 12C – Eggplant and eggplant-like commodities, Table 2)**

Indonesia supports the adoption of the Consequential amendment to the: Classification of Food and Feed (CXA 4-1989) (additional commodity groups in Class A – Primary food commodities of plant origin and Class D – Processed commodities of plant origin; and Principles and Guidance on the Selection of Representative Commodities for the Extrapolation of MRLs to Commodity Groups (CXG 84-2012).

**Part 2 – Proposals to undertake new work for approval**

**6. Priority list of pesticides for evaluation by JMPR**

Indonesia supports the proposed priority list of pesticides for evaluation by JMPR to be adopted as new work.

**7. Development of Guidance for monitoring the stability and purity of reference materials and related stock solutions of pesticides during prolonged storage**

Indonesia supports the proposal of the Development of Guidance for monitoring the stability and purity of reference materials and related stock solutions of pesticides during prolonged storage to be adopted as new work.

**ITEM 4.14: CODEX COMMITTEE ON GENERAL PRINCIPLES**

**Part 1 – Proposals submitted for approval**

**1. Review of the procedures in section 3 of the PM, guidelines for subsidiary bodies**

Indonesia supports the approval of the review of the procedures in section 3 of the PM, guidelines for subsidiary bodies.

**2. Issuing of a Circular Letter soliciting proposals from Members on inconsistencies in language, and superseded content of the PM, apart from section 3**

Indonesia supports the approval of the Issuing of a Circular Letter soliciting proposals from Members on inconsistencies in language, and superseded content of the PM, apart from section 3.

**ITEM 8: APPLICATION OF THE STATEMENTS OF PRINCIPLE CONCERNING THE ROLE OF SCIENCE IN THE CODEX DECISION-MAKING PROCESS AND THE EXTENT TO WHICH OTHER FACTORS ARE TAKEN INTO ACCOUNT (SOP)**

Indonesia appreciates the work done by the Chairperson and Vice-chairpersons in preparing this document to analyze comments from all members and observers regarding the Guidance on the Application of SoP. Indonesia hopes that the availability of this document will assist the decision-making process in Codex in the future.

Regarding the proposal for addressing the outstanding issues as included under each specific question as mentioned in the document CX/CAC 23/46/21, Indonesia has the following comments:

**Should the guidance cover new work proposals?**

The stage of reviewing a new work proposal is the initial phase of scrutinization to consider whether the proposed new work may potentially cause issues in the future. Therefore, Indonesia is of the view that this guidance document should also cover new work proposals. Indonesia believes that it is necessary so that issues related to OLF can be identified earlier.

**Considering the discussions on other legitimate factors during CAC45, is there a need for any further guidance on this aspect?**

In relation to OLF, Indonesia believes that there are currently differing views among countries regarding what factors can be categorized as OLF. Therefore, Indonesia is of the opinion that further discussions on the definition of OLF and the criteria or examples of factors included in it, should be conducted at the Commission level.

**Placement of the guidance**

Indonesia supports that once the guidance finalised and endorsed, it should be included in the existing Codex Chairperson's Handbook and any future handbook for delegates.

**ITEM 9: NEW FOOD SOURCES AND PRODUCTION SYSTEMS**

Indonesia appreciates the analysis of the comments prepared by Chair and Vice-chairpersons as presented on the CX/CAC 23/46/22.

Indonesia has the same opinion that there is still range of views with regard to how Codex might work on NFPS. In line with the conclusions of CAC45, where the Commission could not find consensus on the need for a new cross-cutting coordination mechanism for NFPS, Indonesia believes that the current structure and mechanism of Codex is sufficient to cover issues related to NFPS. Indonesia also notes that based on the Codex Procedural Manual – Criteria for the establishment of subsidiary bodies of the Codex Alimentarius Commission, a new Codex Subsidiary Body is formed when there is a proposal for the elaboration of a standard, code of practice, or related text in area not covered by the terms of reference of any existing subsidiary bodies. Therefore, members who wish to propose a new work on NFPS could submit discussion papers and/or new work proposals either to existing Codex Committees or the CCEXEC for further consideration and final decision by CAC.