

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 4, 5, 6, 7, 8, 10, 11, 13.1

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Forty-second Session

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Comments of Indonesia

AGENDA ITEM 4

CX/CAC 19/42/3; CX/CAC 19/42/3 Add.1

Final adoption of Codex texts (at Steps 8, 5/8 and 5A)

Part 1 – Standards and related texts submitted for adoption

1. **Proposed draft standard for dried or dehydrated garlic (CCSCH)**
Indonesia supports the adoption of Proposed Draft Standard for dried or dehydrated garlic at step 5/8
2. **Proposed draft revision to the Standard for Named Vegetable Oils (CXS 210-1999): Addition of Palm Oil with a higher content of Oleic Acid (OXG) (CCFO)**
Indonesia supports the adoption of Proposed Draft revision to the Standard for Named Vegetable Oils (CXS 210-1999): Addition of Palm Oil with a higher content of Oleic Acid (OXG) at step 8
3. **Proposed draft revision to the Standard for Named Vegetable Oils (CXS 210-1999): Replacement of acid value with Free Fatty Acid for Virgin Palm Oil and Inclusion of Free Fatty Acid for Crude Palm Kernel Oil (CCFO)**
Indonesia supports the adoption of Proposed Draft revision to the Standard for Named Vegetable Oils (CXS 210-1999): Replacement of acid value with Free Fatty Acid for Virgin Palm Oil and Inclusion of Free Fatty Acid for Crude Palm Kernel Oil at step 5/8
4. **Revision of the Class Names and the International Numbering System for Food Additives (CXG 36-1989) (CCFA)**
Indonesia supports the adoption of Revision of the Class Names and the International Numbering System for Food Additives at step 5/8.
5. **Insertion of a footnote to the table entitled “References to Commodity Standards for GSFA Table 3 Additives (CCFA)**
Indonesia supports the adoption of Insertion of a footnote to the table entitled “References to Commodity Standards for GSFA Table 3 Additives”.
6. **Revised food-additive sections of Standard for Natural mineral waters and Bottled/packageged drinking waters (other than natural mineral waters) (CCFA)**
Indonesia supports the adoption for Revised food-additive sections of Standard for Natural mineral waters and Bottled/packageged drinking waters (other than natural mineral waters).
7. **The revised table on “Justified use” in food additive section in the Standard for Mozzarella (CXS 262- 2006) (CCFA).**
Indonesia supports the adoption for the revised table on “Justified use” in food additive section in the Standard for Mozzarella.
8. **MRLs for different combinations of pesticide/commodity(ies) for food and feed proposed by adoption by CCPR49 (CCPR)**
Indonesia supports the adoption of proposed draft of MRLs for different combinations of pesticide/commodity(ies) for food and feed at step 5/8.

- 9. Revision of the Classification of Food and Feed (CX/M 4-1989): Miscellaneous commodities not meeting the criteria for crop grouping (CCPR)**
Indonesia agrees with the format and codes for the single system to address miscellaneous commodities within the classification that did not meet the criteria for crop grouping and support the adoption at step 5/8 and 8.
- 10. Draft Guidelines for rapid risk analysis following instances of detection of contaminants in food where there is no regulatory level (CCCF)**
In principles, Indonesia supports the adoption of Draft Guidelines for rapid risk analysis following instances of detection of contaminants in food where there is no regulatory level at step 8. However, Indonesia would like to re-iterate its concern at CCCF-13 that the implementation of the proposed draft guideline will greatly affect trade and potentially cause problems in international trade, especially for developing countries. This is mainly due to two main factors. First, is related to the differences in understanding (or even a lack of understanding) about the technical details of the draft guidelines. This situation sometime even creates confusion about the Guidelines. Second factor, is related to the differences in technical capacity in applying the draft guidelines; especially regarding laboratory testing of unregulated contaminants.
- Therefore, following the adoption of this guidelines, Indonesia proposes that there must be a global effort (especially supported by FAO/WHO) to prepare more technical guidelines in the testing laboratory for the implementation of the proposed draft guideline, especially related to the TTC concept in risk management. This will enable countries to prepare and build adequate laboratory testing capabilities. We also propose that international technical cooperation should be established to accelerate this capability. Without laboratory testing capabilities, the TTC concept in unregulated contaminant risk management cannot be implemented fairly for each member country.
- 11. Methods of analysis / performance criteria for provisions in Codex standards**
Indonesia supports the adoption of Methods of analysis / performance criteria for provisions in Codex standards.
- 12. Preamble and document structure for the General Standard on Methods of Analysis and Sampling (CODEX STAN 234-1999)**
Indonesia supports the adoption of Preamble and document structure for the General Standard on Methods of Analysis and Sampling (CODEX STAN 234-1999) at step 5/8.

AGENDA ITEM 5

CX/CAC 19/42/5; CX/CAC 19/42/5 Add.1

Adoption of Codex texts at Step 5

- 1. Draft Principles and guidelines for the assessment and use of voluntary Third-Party Assurance (vTPA) programmes (CCFICS)**
Indonesia supports the adoption of Draft Principles and guidelines for the assessment and use of voluntary Third-Party Assurance (vTPA) programmes at step 5. Indonesia has some concern and proposes that the Draft Principles and Guidelines should clearly explain that the use of vTPA will not shift the responsibility from the national food control system
- 2. Review of the Standard for Follow-up Formula (CXS 156-1987): Proposed draft Scope, Description and Labelling for follow-up formula for older infants (CCNFSDU)**
Indonesia supports the adoption of Standard for Follow-up Formula (CXS 156-1987): Proposed draft Scope, Description and Labelling for follow-up formula for older infants at step 5.
- 3. Proposed draft standard for dried oregano (CCSCH)**
Indonesia supports the adoption of Proposed draft standard for dried oregano at step 5.
- 4. Proposed draft standard for dried roots, rhizomes and bulbs — dried or dehydrated ginger (CCSCH)**
Indonesia supports the adoption of Proposed draft standard for dried roots, rhizomes and bulbs — dried or dehydrated ginger at step 5.
- 5. Proposed draft standard for dried basil (CCSCH)**
Indonesia supports the adoption of Proposed draft standard for dried basil at step 5.

6. Proposed draft standard for dried floral parts – dried cloves (CCSCH)

Indonesia supports the adoption of Proposed draft standard for dried floral parts – dried cloves at step 5.

7. Proposed draft standard for saffron (CCSCH)

Indonesia supports the adoption of Proposed draft standard for saffron at step 5

AGENDA ITEM 6

CX/CAC 19/42/7

Revocation of Codex Texts**1. Provisions for monosodium tartrate (INS 335(i)), monopotassium tartrate (INS 336(i)) and dipotassium tartrate (INS 336(ii)) in the Standard for Processed Cereal-Based Foods for Infants and Young Children (CXS 74-1981) (CCNFSDU)**

Indonesia supports to revoke the Provisions for monosodium tartrate (INS 335(i)), monopotassium tartrate (INS 336(i)) and dipotassium tartrate (INS 336(ii)) in the Standard for Processed Cereal-Based Foods for Infants and Young Children (CXS 74-1981).

2. CXLs for different combinations of pesticide/commodity(ies) for food and feed (CCPR)

Indonesia supports to forward the proposed draft of CXLs for different combinations of pesticide/commodity(ies) for food and feed for revoaction.

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

Indonesia supports to revoke the Methods of analysis for provisions in Codex standards – CXS 234 – 1999.

AGENDA ITEM 7

CX/CAC 19/42/8; CX/CAC 19/42/8 Add.1

Proposals for New Work**1. Project document for new work on the consolidation of Codex Guidelines related to equivalence (CCFICS)**

Indonesia supports the adoption of Project document for new work on the consolidation of Codex Guidelines related to equivalence

2. Project document for new work on development of guidelines for the control of Shiga toxin-producing Escherichia coli (STEC) in beef meat, leafy greens, raw milk and cheese produced from raw milk, and sprouts (CCFH)

Indonesia supports the adoption of Project document for new work on development of guidelines for the control of Shiga toxin-producing Escherichia coli (STEC) in beef meat, leafy greens, raw milk and cheese produced from raw milk, and sprouts

3. Proposal for new work to develop Guidelines for compounds of low public health concern that could be exempted from the establishment of CXLs (CCPR)

Indonesia supports the result of CCPR52 meeting that agreed to start new work on the development of guidance for compounds of low public health concern that could be exempted from the establishment of CXLs.

4. Revision of the Code of practice for the prevention and reduction of lead contamination in foods (CXC 56-2004) (CCCF)

Indonesia supports the adoption of Revision of the Code of practice for the prevention and reduction of lead contamination in foods as a new work (CXC 56-2004).

5. Development of a Code of practice for the prevention and reduction of cadmium contamination in cocoa beans (CCCF)

Indonesia supports the adoption of Development of a Code of practice for the prevention and reduction of cadmium contamination in cocoa beans as a new work.

- 6. Establishment of MLs for aflatoxins in certain cereals and cereal-based products including foods for infants and young children (CCCF)**
Indonesia supports the adoption of Establishment of MLs for aflatoxins in certain cereals and cereal-based products including foods for infants and young children as a new work.
- 7. Proposed draft guidance on internet sales/e-commerce (CCFL)**
Indonesia supports the adoption of Proposed draft guidance on internet sales/e-commerce as a new work.
- 8. Proposal for new work on allergen labelling: Revision to the General Standard for the Labelling of Prepackaged Foods: allergen labelling, and guidance on precautionary allergen or advisory labeling (CCFL)**
Indonesia supports the adoption of Proposal for new work on allergen labelling: Revision to the General Standard for the Labelling of Prepackaged Foods: allergen labelling, and guidance on precautionary allergen or advisory labeling as a new work.

AGENDA ITEM 8

CX/CAC 19/42/9

Discontinuation of Work

- 1. NRV-NCD for EPA and DHA long chain omega-3 fatty acids (CXG 2-1985) (CCNFSDU)**
Indonesia supports the discontinuation of NRV-NCD for EPA and DHA long chain omega-3 fatty acids (CXG 2-1985).
- 2. MRLs for different combinations of pesticide/commodity(ies) in the Step Procedure that were withdrawn (discontinued) by CCPR (CCPR)**
Indonesia agrees to discontinue the work with note that the draft and proposed draft MRLs withdrawn are attached as Appendix (VI).

AGENDA ITEM 10

CX/CAC 19/42/11 Add.1

Matters Referred to the Commission by Codex Committees**Matters for Action****CCPFV (Codex Committee on Processed Fruits and Vegetables)**

Indonesia would like to thank Chair of CCPFV for providing an update on the progress of CCPFV and recommendation for future CCPFV activities. We are of the view that the committee working by correspondence is not similar conceptually with an electronic working group (EWG), where the EWG should report back to Committee meeting for making decision. While recognizing that working by correspondence is one of the options available to efficiently organize the work of Codex, mechanism for reaching the consensus by correspondence is still confusing so that holding a physical meeting is still a better option for this purpose.

We noted that CAC 41 had requested CCGP to formulate procedure guidance for committees working by correspondence and it had been discussed during the last CCGP session. CCGP agreed to set up an EWG to develop criteria to identify work appropriate to be undertaken by committees working by correspondence and develop procedural guidance for such committees. Therefore, we could not support recommendation that committee working by correspondence recommend to CAC for final adoption the draft standards until CCGP finalized the procedure guidance. We agree to the option that CCPFV continues meeting by correspondence until the level of progress on standards is sufficient, and followed by physical meeting to finalized consensus, before submitting the draft standards to Commission for adoption.

AGENDA ITEM 11

CX/CAC 19/42/12

Codex Strategic Plan 2020 - 2025

Indonesia appreciates the efforts done the sub-committee of the Executive Committee in cooperation with Codex Secretariat for preparing the revised version of the draft Codex Strategic Plan 2020-2025. We support in principle the adoption of Codex Strategic Plan 2020-2025 by CAC 42.

The current draft is prepared according to the comments submitted in response to CL 2019/21. We noted that in the current drafts some provisions are on square brackets, especially in Codex Vision and Mission, and Goals number 1 and 2. We prefer to the previous version as contained in CL 2019/21 which were clearer and generally acceptable, as it is still relevant to the dual mandate of Codex.

AGENDA ITEM 13.1**CX/CAC 19/42/14 Add.1****Discussion Paper on Sustainable Funding of Scientific Advice Provided to Codex**

Indonesia thanks to all Members which prepared the Discussion Paper on Sustainable Funding of Scientific Advice Provided to Codex in response to the discussion during the last Commission session. Scientific advice programme is an important activity in developing science-based standards. The recommendation provided by Joint FAO/WHO Expert Committees and Meetings such as JECFA, JMPR, JEMRA and JEMNU will not only be used by related Codex Subsidiary Bodies, but also by Countries when developing their national standards and regulations. We support the recommendation contained in discussion paper to urge the FAO WHO to step up efforts to ensure sufficient and sustainable funding for the Joint FAO/WHO scientific advice programm