

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 5, 6, 7, 8, 9, 10, 11, 13, 14, 15, 16

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ORIGINAL LANGUAGE

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON CONTAMINANTS IN FOODS

17th Session
15-19 April 2024

Comments submitted by Indonesia

Agenda Item 5: Maximum levels for lead in certain food categories (at Step 4)

Indonesia appreciates and thanks Brazil for preparing the document for the discussion under the agenda item 5.

Considering that lead in spices contribute minimally to the total dietary exposures to lead due to their relatively low consumption by weight, Indonesia would like to propose a single ML for both spices and herbs. The reason for this proposal is also to ease food control in the market.

Agenda Item 6: Sampling plans for methylmercury in fish (at Step 4)

Indonesia supports the development of the sampling plans for methylmercury in fish.

Agenda Item 7: Definition for ready-to-eat peanuts for the establishment of a maximum level for total aflatoxins in this product

Indonesia would like to seek clarification on the definition of Ready-to-Eat:

- whether raw shelled peanuts and raw in-shell peanuts can be consumed directly without undergo an additional processing /treatment.
- examples of additional processing which are proven to reduce levels of aflatoxins.

Agenda Item 8: Sampling plans for total aflatoxins and ochratoxin A in certain spices (at Step 4)

Indonesia welcomes and appreciates the work done by India as chair of the Electronic Working Group to prepare the document [CX/CF 24/17/8](#) related to Sampling Plans for Total Aflatoxins and Ochratoxin A in certain Spices.

Indonesia would like to make the following comments:

A. Spices With Large Particle Size

- The term of large particle size in this document should be defined for clarification, for example, EU uses terminology of “particle size comparable with peanuts or larger” to define large particle size.
- Considering that mycotoxins in food products are not evenly distributed, the weight for each of incremental sample of **100 g** might not adequately represent the quantity and variability of samples at each sampling point. Therefore, Indonesia proposes that the weight for each incremental sample of spices with larger particle size is **200g**. Consistent with this, the aggregate sample weight as shown in the table I and table II should be revised.

Table 1 Subdivision of lots into sublots depending on product and lot weight

Commodity	Lot Weight (tonnes)	Weight/number of sublots	No Incremental Samples	Aggregate Sample Weight (kg)
Spices with Large Particle Size	≥ 500	100 tonnes	100	20
	> 125 and < 500	5 sublots	100	20
	≥ 15 and ≤ 125	25 tonnes	100	20
	15	-	10-100*	2-20

(*) Depending on the lot weight — see table 2

Table 2 Number of incremental samples to be taken depending on the weight of the lot and number of subdivisions of the aggregate sample

Lot weight (tonnes)	No of incremental samples	Aggregate sample Weight (kg)	No of laboratory samples from aggregate sample
≤ 0.1	10	2	1 (no division)
> 0.1 – ≤ 0.2	15	3	1 (no division)
> 0.2 – ≤ 0.5	20	4	1 (no division)
> 0.5 – ≤ 1.0	30	6	1 (no division)
> 1.0 – ≤ 2.0	40	8 (- < 12 kg)	1 (no division)
> 2.0 – ≤ 5.0	60	12	2
> 5.0 – ≤ 10.0	80	16	2
> 10.0 – ≤ 15.0	100	20	2

B. Spices With Small Particle Size

- The weight for each incremental size of **100 g** for spices with small particle size should be defined for this section.

C. Powdered Spices

- Since spices in powdered form are normally traded in small quantity, the table 6 should be amended to include small quantity of lot weight.

Table 6. Minimum number of incremental samples to be taken depending on the weight of the lot of powdered spices

Lot weight (tonnes)	No of incremental samples	Aggregate sample Weight (kg)
≤ 0.01	3	0.1
> 0.01 – ≤ 0.5	10	0.4
> 0.5 – ≤ 5	25	1.0
> 5.0 – ≤ 10.0	35	16
> 10.0 – ≤ 15.0	50	20

- The weight for each incremental size of **40 g** for powdered spices should be defined for this section.

Agenda Item 9: Code of practice/guidelines for the prevention and reduction of ciguatera poisoning (at Step 4)

Indonesia supports the development of code of practice/guidelines for the prevention and reduction of ciguatera poisoning.

Agenda Item 10: Discussion paper on pyrrolizidine alkaloids in food and feed

Indonesia supports the development of Code of Practice for Weed Control to Prevent and Reduce Pyrrolizidine Alkaloid Contamination in Food and Feed.

Agenda Item 11: Discussion paper on tropane alkaloids in foods

Indonesia supports to include the addition of tropane alkaloids on Code of Practice for Weed Control to Prevent and Reduce Pyrrolizidine Alkaloid Contamination in Food and Feed.

Agenda Item 13: Request for comments on the recommendation for the establishment of maximum levels for cadmium and lead in quinoa

Indonesia supports maximum level of 0,2 mg/kg for cadmium and lead in cereal grains quinoa.

Agenda Item 14: Review of the Code of Practice for the Prevention and Reduction of Aflatoxin Contamination in Peanuts (CXC 55-2004)

Indonesia supports the revision of Code of Practice for the Prevention and Reduction of Aflatoxin Contamination in Peanuts.

Agenda Item 15: Review of the *Code of Practice for the Reduction of Aflatoxin B1 in Raw Materials and Supplemental Feedingstuffs for Milk-Producing Animals (CXC 45-1997)*

Indonesia supports the revision of Code of Practice for the Reduction of Aflatoxin B1 in Raw Materials and Supplemental Feedingstuffs for Milk-producing Animals.

Agenda Item 16: Development of a Code of practice for the prevention and reduction of cadmium contamination in foods

Indonesia supports the development of Code of practice for the prevention and reduction of cadmium contamination in foods. The Code of Practice for the Prevention and Reduction of Cadmium Contamination in Cocoa Beans should be adapted as an annex in that CoP.