

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of  
the United Nations



World Health  
Organization

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Agenda 3,6

FFP/34 CRD/21

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS

Thirty-fourth Session

Ålesund, Norway, 19 – 24 October 2015

### Comments prepared by Indonesian Delegates

#### Agenda Item 3

Appendix IV CX/FFP 15/34/4

#### DRAFT CODE OF PRACTICE FOR PROCESSING OF FISH SAUCE

##### Section 8. Blending

Indonesia would like to propose in third bullets as follow:

- All utensils should be clean, **rust-free and should be made from non-hazardous material and be able to prevent product contamination.**

##### Rationale:

All utensil used for blending process should comply with these utensils requirements to prevent from product contamination

#### Agenda Item 6

CX/FFP 15/34/7

#### PROPOSED FOOD ADDITIVE PROVISIONS IN STANDARDS FOR FISH AND FISHERY PRODUCTS

**Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets - Breaded or in Batter CODEX STAN 166-1989 (GSFA FC 09.2.2)**

INS.No	Additive	Max Level (mg/kg)	Indonesia Comments
407	Carrageenan and its Na, K, NH <sub>4</sub> salts (including Furcelleran)	GMP	Indonesia supports proposal
1401	Acid treated starches	GMP	Indonesia supports proposal
1402	Alkaline treated starches	GMP	Indonesia supports proposal
1420	Starch acetate esterified with acetic anhydride	GMP	Indonesia supports proposal

INS.No	Additive	Max Level (mg/kg)	Indonesia Comments
621	Monosodium L-glutamate	GMP	Indonesia supports proposal
622	Monopotassium L-glutamate	GMP	Indonesia supports proposal
160b(i)	Annatto extracts <del>bixin-based</del>	25 mg/kg expressed as bixin or norbixin	Indonesia proposes the use of Annatto extracts, bixin based : Aqueous Processed Bixin, Solvent-Extracted Bixin, Oil-Processed Bixin as colouring (INS. 160b (i)) for Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets - Breaded or in Batter CODEX STAN 166-1989 and the ML of 20 mg/kg as as bixin with notbixin 28% to bixin.  We permit the use of this food additive and the proposed ML has already given the technological function.This food additives already adopted by GSFA.
<del>160b(ii)</del>	<del>Annatto extract (norbixin-based)</del>		
407	Carrageenan and its Na, K, NH <sub>4</sub> salts (including Furcelleran)	GMP	Indonesia supports proposal
1420	Starch acetate esterified with acetic anhydride	GMP	Indonesia supports proposal

**Standard for Salted Atlantic Herring and Salted Sprat CODEX STAN 244-2004 (GSFA FC 09.2.5)**

**Acidity Regulators, antioxidants**

INS.No	Additive	Max Level (mg/kg)	Indonesia Comments
300	Ascorbic acid	GMP	Indonesia supports proposal
330	Citric acid	GMP	Indonesia supports proposal
<b>200-203*</b>	<b>Sorbates</b>	<b>200 mg/kg as sorbic acid, singly or in combination</b>	Indonesia proposes the ML of 1000 mg/kg as sorbic acid since the uses of sorbates with ML of 1000 mg/kg as sorbic acid not exceed the ADI. Indonesia is of the view that the ML is already adopted by GSFA.

**Standard for Salted Fish and Dried Salted Fish of the Gadidae Family of Fishes CODEX STAN 167- 1989 (GSFA FC 09.2.5)**

**Preservatives**

INS.No	Additive	Max Level (mg/kg)	Indonesia Comments
<b>200-203</b>	<b>Sorbates</b>	200 mg/kg expressed as sorbic acid, singly or in combination	Indonesia proposes the ML of 1000 mg/kg as sorbic acid since the uses of sorbates with ML of 1000 mg/kg as sorbic acid not exceed the ADI. Indonesia is of the view that the ML is already adopted by GSFA.

**Standard for Crackers from Marine and Freshwater Fish, Crustaceans and Molluscan Shellfish CODEX STAN 222-2001 (GSFA FC 09.2.5)**

INS.No	Additive	Max Level (mg/kg)	Indonesia Comments
Flavour enhancers			
621	Monosodium L-glutamate	Limited by GMP	Indonesia supports proposal

**Standard for Canned Shrimps or Prawns CODEX STAN 37-1981 (GSFA FC 09.4)**

INS.No	Additive	Max Level (mg/kg)	Indonesia Comments
338	<del>Orthophosphoric</del> <b>Phosphoric acid</b>	<del>850 mg/kg</del> <b>540 mg/kg as phosphorus, singly or in combination</b>	Indonesia proposes the ML of 2000 mg/kg as phosphorus since the uses of phosphoric acid with the ML of 2000 mg/kg not exceed the ADI. Indonesia also considers that GSFA has adopted phosphoric acid with the ML of 2200 mg/kg.

**Standard for Canned Tuna and Bonito CODEX STAN 70-1981 (GSFA FC 09.4)**

INS.No	Additive	Max Level (mg/kg)	Indonesia Comments
<b>Thickening Thickeners or and Gelling Agents</b> (for use in packing media only)			
1401	Acid treated starches (including white and yellow dextrins)	Limited by GMP	Indonesia supports proposal
1402	Alkaline treated starches	GMP	Indonesia supports proposal
1412	Distarch phosphate esterified	GMP	Indonesia supports proposal
1420/44 24	Starch acetate	GMP	Indonesia supports proposal
1442	Hydroxypropyl distarch phosphate	GMP	Indonesia supports proposal
260	Acetic acid, <b>glacial</b>	GMP	Indonesia supports proposal
<b>Acidity Regulators</b>			
450(i)	Disodium diphosphate	10 mg/kg expressed as $P_2O_5$ ?	Indonesia proposes the ML of 2000 mg/kg as phosphorus since the uses of phosphoric acid with the ML of 2000 mg/kg not exceed the ADI.

INS.No	Additive	Max Level (mg/kg)	Indonesia Comments
		<del>mg/kg as phosphorus, singly or in combination (includes natural phosphate)</del>	Indonesia also considers that GSFA has adopted phosphoric acid with the ML of 2200 mg/kg.

**Standard for Canned Crab Meat CODEX STAN 90-1981 (GSFA FC 09.4)**

INS.No	Additive	Max Level (mg/kg)	Indonesia Comments
<b>Acidity Regulators</b>			
330	Citric acid	GMP	Indonesia supports proposal
338	<del>Orthophosphoric</del> <b>Phosphoric</b> acid	40 mg/kg expressed as <del>P<sub>2</sub>O<sub>5</sub></del> , 2 mg/kg as phosphorus,	Indonesia proposes the ML of 2000 mg/kg as phosphorus since the uses of phosphoric acid with the ML of 2000 mg/kg not exceed the ADI. Indonesia also considers that GSFA has adopted phosphoric acid with the ML of 2200 mg/kg.
450(i)	Disodium diphosphate	singly or in combination (includes natural phosphate)	
<b>Flavour enhancers</b>			
621	Monosodium L-glutamate	GMP	Indonesia supports proposal

**Standard for Canned Sardines and Sardine-Type Products CODEX STAN 94-1981 (GSFA FC 09.4)**

Indonesia supports proposal

**Standard for Canned Finfish CODEX STAN 119-1981 (GSFA FC 09.4)**

Indonesia supports proposal