

# CODEx ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Items 5,6,11,13,14,16,17

CRD17

ORIGINAL LANGUAGE

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON CONTAMINANTS IN FOODS

13<sup>th</sup> Session

Yogyakarta, Indonesia, 29 April – 3 May 2019

### Comments of Indonesia

#### **AGENDA ITEM 5 - PROPOSED DRAFT MLS FOR LEAD IN SELECTED COMMODITIES IN THE GSCTFF (CXS 193-1995) (AT STEP 4)**

Indonesia wishes to thank electronic Working Group led by USA for preparing the Proposed draft MLs for lead in selected commodities in the GSCTFF (CXS 193-1995).

Indonesia supports recommendations of the eWG as provided in the document related to the maximum limit of lead in wine and edible offal.

#### **AGENDA ITEM 6 - PROPOSED DRAFT MAXIMUM LEVELS FOR CADMIUM IN CHOCOLATE AND COCOA-DERIVED PRODUCTS**

Indonesia wishes to thank electronic Working Group led by Ecuador for preparing new work on Maximum Levels (MLs) for cadmium in chocolate and cocoa derived products.

Regarding the alternative options to the establishment of MLs for cadmium in chocolate and cocoa derived products, with taking into account that this agenda has been discussed since 2014 and existing data still unclear between eWG members, Indonesia supports the recommendation of the committee to postpone the proposal for establishing MLs for the remaining chocolate categories and cocoa powder categories.

#### **AGENDA ITEM 11 - ESTABLISHMENT OF NEW MLs FOR LEAD IN PRIORITIZED COMMODITIES ACCORDING TO A STRUCTURED PRIORITIZATION APPROACH**

Indonesia appreciates the work performed by Brazil for preparing discussion paper on The Establishment of New Maximum Levels for Lead in Commodities According to A Prioritization Approach. Regarding the recommendation of the eWG, Indonesia would like to provide the following comment:

- Indonesia is of the view that prioritization criteria is not only related to the impact of exposure and international trade but should also consider the complexity and diversity of the food category e.g spices, seafood, herbal tea and processed fish. Spices have very diversified type (seed, herb, rhizome, leaf, root, etc) so it will be difficult to determine the single maximum levels for this category.
- Indonesia proposes the eWG to review the proposed prioritization list of foods.
- Indonesia considers that new work to set ML should be start after eWG review the prioritization list.
- Indonesia supports call for data on the lead contamination.
- Indonesia supports the recommendation of the eWG to identify other foods that are highly consumed by children and their respective consumption.

#### **AGENDA ITEM 13 - REVISION OF THE CODE OF PRACTICE FOR THE PREVENTION AND REDUCTION OF LEAD CONTAMINATION IN FOODS**

Indonesia wishes to express its appreciation to the chair, United States of America and co-chair United Kingdom, for leading the eWG on the Revision of the Code of Practice for the Prevention and Reduction of Lead Contamination in Food.

Indonesia considers that there is sufficient additional information available on lead sources and mitigation measure to justify revisions to the *Code of Practice for the Prevention and Reduction of Lead Contamination* (CXC 56- 2004) and therefore agrees to forward the project document for revisions to CXC 62-2006 (Appendix I) to CCEXEC/CAC for approval as new work. However, Indonesia considers that the COP should be feasible for small-scale farmers and small scale industries to apply.

**AGENDA ITEM 14 DISCUSSION PAPER ON THE DEVELOPMENT OF A CODE OF PRACTICE FOR THE PREVENTION AND REDUCTION OF CADMIUM CONTAMINATION IN COCOA**

Indonesia appreciates the work performed by Peru for preparing discussion paper on Development of a Code of Practice for The Prevention and Reduction of Cadmium Contamination in Cocoa Beans.

Indonesia considers that there is sufficient information on mitigation measures to support the development of a code of practice in the area of cocoa field production and post-harvest (fermentation, drying and storage processes) and therefore agrees to forward the project document in Appendix I for the development of a COP for the prevention and reduction of cadmium contamination in cocoa beans for approval as new work by the Codex Alimentarius Commission (CAC42, 2019).

**AGENDA ITEM 16 - ESTABLISHMENT OF MLs FOR HCN IN CASSAVA AND CASSAVA-BASED PRODUCTS AND OCCURRENCE OF MYCOTOXINS IN THESE PRODUCTS**

Indonesia would like to thank Nigeria as Chair of the EWG for leading eWG on Establishment of MLs for HCN in cassava and cassava-based products and occurrence of mycotoxins in these products.

Indonesia proposes that the document should focus on the establishment of the maximum level for HCN, especially in fermented cassava product. The discussion of maximum level for mycotoxin could be discussed in the next project/work.

**AGENDA ITEM 17 - ESTABLISHMENT OF MLs FOR TOTAL AFLATOXINS IN CEREALS (WHEAT, MAIZE, SORGHUM AND RICE), FLOUR AND CEREAL-BASED FOODS FOR INFANTS AND YOUNG CHILDREN)**

Indonesia wishes to thank electronic Working Group led by Brazil for preparing discussion paper on Establishment of MLs for total aflatoxins in cereals (wheat, maize, sorghum and rice), flour and cereal-based foods for infants and young children.

Indonesia supports recommendations of the eWG as provided in the document. Indonesia considers that rice flour should be included in the category of polished rice and applied the same ML. Indonesia also supports the inclusion of sorghum in the food categories selected for new work.