Question 7: Issues Relevant to the Region

(For Actions 3.2, 4.1, 6.2 of the Strategic Plan for the CCASIA 2009-2014)

Please describe up to 10 priority concerns and/or interests that you have related to Codex work currently undertaken or you would like to discuss in the future, and that you wish to share with other members of Asian region. Please include following aspects in your answer:

a) Name of subsidiary body that is most relevant to your concern and/or interest;
b) Reason for your concern and/or interest;
c) Status of work at the subsidiary body; and
d) Any actions you wish to have in the work of the subsidiary body in the future.

### Indonesia

The priority concerns and/or interests that you have related to Codex work as follows:

<table>
<thead>
<tr>
<th>No</th>
<th>Interest issues</th>
<th>Subsidiary body</th>
<th>Reason</th>
<th>Status of work</th>
<th>Actions in the future</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Maximum level for Arsenic in rice</td>
<td>CCCF</td>
<td>Indonesia is the largest rice consumer</td>
<td>Discussion paper</td>
<td>Maximum level setting</td>
</tr>
<tr>
<td>2.</td>
<td>Regional Standard for Tempe</td>
<td>CCASIA</td>
<td>Indonesia is tempe producer</td>
<td>Step 3</td>
<td>Establishment standard for tempe</td>
</tr>
<tr>
<td>3.</td>
<td>Maximum level for OTA in cocoa and cocoa products</td>
<td>CCCF</td>
<td>Indonesia is the 3rd largest producer of cocoa</td>
<td>Discussion paper</td>
<td>Maximum level setting</td>
</tr>
<tr>
<td>4.</td>
<td>Maximum level of HCN in cassava</td>
<td>CCCF</td>
<td>Indonesia produces cassava and also consumer of cassava</td>
<td>Discussion paper</td>
<td>Maximum level setting</td>
</tr>
<tr>
<td>5.</td>
<td>Histamine</td>
<td>CCFFP</td>
<td>Indonesia concern about trade implication/problem associated with histamine controls including sampling plans</td>
<td>Discussion paper</td>
<td>Maximum level setting</td>
</tr>
<tr>
<td>6.</td>
<td>Standard for Fish Oils</td>
<td>CCFO</td>
<td>Indonesia is Fish Oils producer.</td>
<td>Step 3</td>
<td>Establishment standard for fish oils</td>
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<tr>
<td>7.</td>
<td>Standard for Durian</td>
<td>CCFFV</td>
<td>Indonesia is Durian producer</td>
<td>Step 3</td>
<td>Establishment standard for durian</td>
</tr>
</tbody>
</table>
8. Standard for avocado  
   CCFFV  
   Indonesia is Avocado producer  
   Step 7  
   Establishment standard for avocado

9. Guidance to facilitate the establishment of Maximum Residue Limits for Pesticides for Minor Crops and Specialty Crops  
   CCPR  
   Establishing MRLs for minor crops was very important especially for developing countries including Indonesia as the lack of MRLs for exported products could create barriers to trade  
   Discussion paper  
   Establishment of Maximum Residue Limits for Pesticides for Minor Crops and Specialty Crops

10. Database on need for MRLs for developing countries  
    CCRVDF  
    Indonesia as developing country needs database  
    -  
    Establishment of Database on need for MRLs for developing countries

JAPAN

Your priority concerns and/or interests:

Science-based approach in Codex

The procedures taken in proposing maximum levels for some contaminants recently were not in accordance with the Codex procedure or policies established.

a) Codex Committee on Contaminants in Foods (CCCF)

b) See Annex 1.

c) Because of the above concern stated by Japan and several other countries at the 6th CCCF, the Committee agreed to retain the proposed draft maximum levels for inorganic or total arsenic in rice pending international validation of an analytical method(s) and subsequent data generation.

d) (CCCF or member countries)
   (i) Collection data from validated method(s)
   (ii) Evaluation these data
   (iii) Application of the ALARA principle
   (iv) Setting maximum level

   < Annex >

In accordance with the Codex principles and policies below, CCCF should elaborate an ML based on sound science.

- The Risk Analysis Principle Applied by the Codex Committee on Contaminants in Foods stipulates as follows:

  - "CCCF’s risk management recommendations to the CAC with respect to contaminants and toxins shall be guided by the principles described in the Preamble and relevant annexes of the Codex General Standard for Contaminants and Toxins in Food and Feed (GSCTFF)”;  

  - "CCCF shall endorse maximum levels only for those contaminants for which 1) JECFA or other FAO/WHO expert consultations have performed a quantitative risk assessment, 2) meets the criteria established as a significant contributor to total dietary exposure for consumers (as per the Codex Policy for Exposure of Contaminants and Toxins in Foods) and 3) the level of the contaminant in food or feed can be determined through appropriate sampling plans and analysis methods, as adopted by Codex. CCCF should take into consideration the analytical capabilities of developing countries unless public health considerations require otherwise”;
"CCCF shall take into account differences in regional and national food consumption patterns and dietary exposure as assessed by JECFA when recommending maximum levels for contaminants and toxins in food and feed"; and

Before finalizing proposals for maximum levels for contaminants and toxins, CCCF shall seek the scientific advice of JECFA about the validity of the analysis and sampling aspects, about the distribution of concentrations of contaminants and toxins in food or feed and about other relevant technical and scientific aspects, as necessary to provide for a suitable scientific basis for its risk assessment proposals to CAC".

The establishment of Maximum Levels in Annex I of the General Standard for Contaminants and Toxins in Food and Feed (GSCCTFF) stipulates as follows:

- MLs should be set as low as reasonably achievable and at levels necessary to protect the consumer. Providing it is acceptable from the toxicological point of view, MLs should be set at a level which is (slightly) higher than the normal range of variation in levels in food and feed that are produced with current adequate technological methods, in order to avoid undue disruptions of food and feed production and trade; 

- Proposals for MLs in products should be based on data from various countries and sources, encompassing the main production areas/processes of those products, as far as they are engaged in international trade; 

- In all cases, a validated method of analysis should be available with which a ML can be controlled; 

- The contaminant as it should be analyzed and to which the ML applies should be clearly defined; and 

- The product as it should be analyzed and to which the ML applies, should be clearly defined."