

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
the United Nations



World Health
Organization

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Agenda Item 2, 3, 6, 7a, 8a and 8b

ASIA/19 CRD14

JOINT FAO/WHO FOOD STANDARDS PROGRAMME FAO/WHO COORDINATING COMMITTEE FOR ASIA

Nineteenth Session

Tokyo, Japan, 3-7 November 2014

COMMENTS OF INDONESIA

Agenda Item 2 Matters arising from the Codex Alimentarius Commission and other Codex Committees

II. MATTERS ARISING FROM OTHER COMMITTEES

Related to the recommendation of 34th of CCMAS, on:

1. the method for lipid content in the regional standard for Tempe; and
2. the conversion factor for determination of protein content,

Indonesia is on the opinion that:

1. Indonesia agree to replace method of analysis for lipid content in the Standard for tempe with ISO 12111|IDF 1:2010.
2. For conversion factor for determination of protein content, we have clarification that.

Based on the FAO's publication (FAO Food and Nutrition Paper 77, Food energy – Methods of analysis and conversion factors) and Food Scientist Journal, conversion factor of 6.25 for the determination of protein content is for general purposes. It is the fact that not all nitrogen in foods is found in protein compound, but also contained in variable quantities of other compounds, such as free amino acids, nucleotides, creatine and choline, where it is referred to as non-protein nitrogen (NPN). Only a small part of NPN is available for the synthesis of (non-essential) amino acids.

Furthermore, the nitrogen content of specific amino acids (as a percentage of weight) varies according to its molecular weight of the amino acid and the number of nitrogen atoms (from one to four, depending upon the amino acid in question).

Based on these facts as well as the difference on amino acid compositions of various proteins, nitrogen content of proteins actually varies from about 13 to 19 percent. This would approximately be equal to nitrogen conversion factors ranging from 5.26 (1/0.19) to 7.69 (1/0.13).

Jones (1941) suggested that $N \times 6.25$ be abandoned and replaced by $N \times$ a factor specific for the food. These specific factors, now referred to as "Jones factors", have been widely adopted. Jones factors for the most commonly eaten foods range from 5.18 (nuts, seeds) to 6.38 (milk). Specific (Jones) factors for the conversion of nitrogen content to protein content for soybean is 5.71.

Accordingly, Indonesia keeps on using conversion factor of 5.71 for the determination of protein content for tempe.

Related to the recommendation of 45th of CCFA, Indonesia agrees to refer to the Guidelines on Substances Used as Processing Aids (CAC/GL 75-2010) in the standard for Tempe.

Agenda Item 3 FAO/WHO Activities relevant to the region, identifying priorities and capacity development needs

Indonesia would like to express our thanks and appreciation for the FAO/WHO activities in Asia Region, especially in the areas of capacity building and the provision of scientific advice implemented since the 18th CCASIA.

In this regard, we note some activities related to Regional Consultations/ Workshops/ Seminars/ Meetings/ trainings and projects/ direct assistance to countries.

For the next project, we would like to submit that Indonesia still need assistance for capacity building in order to use of Codex standards and related texts as a basis for national legislation, and technical assistance and funding for scientific data collection, including testing, particularly the determination of maximum level for pesticides and contaminant.

Agenda Item 6 Discussion Paper On (I) The Classification Of “Compressed Soybean Curd”; And (II) The Food Additive Provisions For “Composite/Flavoured Soybean Milk”

4. FOOD ADDITIVES

4.1. General requirements-Requirements

Indonesia would like to propose some comments for the use of food additives as mentioned at Table 2 (are indicated by Bold font and underlining):

Colours :

We would like to propose food additive colours for Soybean curd and related products (2.2.2), Compressed soybean curd (2.2.3) and Dehydrated soybean milk film (2.2.4), in Indonesia we use the food additives colours for those products and usually used natural colours

Preservatives :

Indonesia is of the view that the used of preservatives for Compressed soybean curd (2.2.3) and Dehydrated soybean milk film (2.2.4) are unnecessary, we concern on reduction of preservatives exposure.

Table 2

Food additive/ functional class	Soybean milk and related products (2.2.1)			Soybean curd and related products (2.2.2)		Compressed soybean curd (2.2.3)	Dehydrated soybean milk film (2.2.4)
	Soybean milk (2.2.1.1)	[Composite /flavoured soybean milk (2.2.1.2)]	Soybean- based beverage (2.2.1.3)	Semisolid soybean curd (2.2.2.1)	Soybean curd (2.2.2.2)		
Acidity regulators	-	[-] <u>[X]</u>	X	X	X	X	-
Antioxidants	-	[-] <u>[X]</u>	X	-	-	-	-
Colours	-	[-] <u>[X]</u>	X	<u>X</u>	<u>X</u>	<u>X</u>	<u>X</u>
Emulsifiers	-	[-] <u>[X]</u>	X	-	-	-	-
Firming Agents	-	-	-	X	X	X	-
Flavour enhancer	-	[-] <u>[X]</u>	X	-	-	-	-
Preservatives	-	[-]	-	-	-	X	X
Stabilizers	-	[-] <u>[X]</u>	X	-	X	-	-
Sweeteners	-	[-] <u>[X]</u>	X	-	-	-	-

4.2. Specific food additive provisions Food Additive Provisions

4.2.1. Composite/flavoured Soybean Milk and Soybean Soybean-based Beverage

Acidity regulators, antioxidants, colours, emulsifiers, flavour enhancer, ~~preservatives~~, stabilizers and sweeteners used in accordance with Tables 1 and 2 of the *General Standard for Food Additives (CODEX STAN 192-1995)* in Food Category 06.8.1 are acceptable for use in foods conforming to this standard.

Table 3

Functional Class	INS No.	Name of Food Additives	Maximum Level	Indonesian Comments
Colour	120	<u>Carmines and cochineal extract</u>	<u>100 mg/kg</u>	Indonesia proposes to add carmines and cochineal extract as colour for this products with the ML of 100 mg/kg. We permit the use of this food additive and our industries use this colour. The proposed ML has already given the technological function.
	150c	Caramel III-	20000 mg/kg	Indonesia proposes to delete the strikethrough

Functional Class	INS No.	Name of Food Additives	Maximum Level	Indonesian Comments
	<u>150c</u>	ammonia caramel <u>Caramel III</u> <u>ammonia process</u>	<u>1500 mg/kg</u>	for Caramel III ammonia process due to we permit the use of this food additives. We also propose the ML of 1500 mg/kg, the current ML is exceeding the ADI and the proposed ML has already given the technological function.
	160a(i), a(iii),e,f	Carotenoids	2000 <u>150 mg/kg</u>	Indonesia proposes the ML of 150 mg/kg, the current ML is exceeding the ADI and the proposed ML has already given the technological function.
Sweetener	<u>960</u>	<u>Steviol glycosides</u>	<u>200 mg/kg as steviol equivalent</u>	Indonesia proposes to add Steviol glycosides as sweetener with the ML of 200 mg/kg. We permit the use of this food additive and the proposed ML has already given the technological function.

4.2.2. Soybean Curd

Indonesia proposes to add food additive colour for this product, as follow :

Stabilizers, Colour, Acidity regulator, firming agent and stabilizers used in accordance with Tables 1 and 2 of the Codex General Standard for Food Additives (CODEX STAN 192-1995) in ~~food category~~ Food Category 06.8.3 are acceptable for use ~~for~~ in foods confirming to this standard

4.2.3. Compressed Soybean Curd,

Table 4

Functional Class	INS No.	Name of Food Additives	Maximum Level	Indonesian Comments
Preservatives	262ii	Sodium diacetate	1000 mg/kg	The used preservatives in this product is unnecessary
<u>Colour</u>	<u>160bi</u>	<u>Annatto extracts, bixin based : Aqueous Processed Bixin, Solvent-Extracted Bixin, Oil-Processed Bixin</u>	<u>20 mg/kg (as bixin with norbixin 28% to bixin)</u>	Indonesia proposes to add Annatto extracts, bixin based : Aqueous Processed Bixin, Solvent-Extracted Bixin, Oil-Processed Bixin as colour with the ML of 20 mg/kg. We permit the use of this food additive and the proposed ML has already given the technological function.
<u>Acidity regulator</u>	<u>338</u>	<u>Orthophosphoric acid</u>	<u>1000 mg/kg (as total phosphorus)</u>	Indonesia proposes to add Orthophosphoric acid as acidity regulator with the ML of 1000 mg/kg. We permit the use of this food additive and the proposed ML has already given the technological function.

4.2.4. Dehydrated Soybean Milk Film

Functional Class	INS No.	Name of Food Additives	Maximum Level	Indonesian Comments
Preservatives	220-225,227-228,539	Sulfites	200 mg/	The used preservatives in this product is unnecessary
<u>Colour</u>	<u>100i</u>	<u>Curcumin</u>	<u>200 mg/kg</u>	Indonesia proposes to add Curcumin as colour with the ML of 200 mg/kg. We permit the use of this food additive and the proposed ML has already given the technological function.
	<u>101(i)-(iii)</u>	<u>Riboflavins</u>	<u>150 mg/kg (as riboflavins)</u>	Indonesia proposes to add riboflavins as colour with the ML of 150 mg/kg. We permit the use of this food additive and the proposed ML has already given the technological function.
	<u>120</u>	<u>Carmines and cochineal extract</u>	<u>200 mg/kg (as carminic acid)</u>	Indonesia proposes to add Carmines and cochineal extract as colour with the ML

Functional Class	INS No.	Name of Food Additives	Maximum Level	Indonesian Comments
				of 200 mg/kg. We permit the use of this food additive and the proposed ML has already given the technological function.
	<u>141(i), 141 (ii)</u>	<u>Chlorophylls and chlorophyllins, copper complexes</u>	<u>30 mg/kg as cuprum</u>	Indonesia proposes to add Chlorophylls and chlorophyllins, copper complexes as colour with the ML of 30 mg/kg. We permit the use of this food additive and the proposed ML has already given the technological function.
		<u>Annatto extracts, bixin based : Aqueous Processed Bixin, Solvent-Extracted Bixin, Oil-Processed Bixin</u>	<u>10 mg/kg (as bixin with norbixin 28% to bixin)</u>	Indonesia proposes to add Annatto extracts, bixin based : Aqueous Processed Bixin, Solvent-Extracted Bixin, Oil-Processed Bixin as colour with the ML of 10 mg/kg. We permit the use of this food additive and the proposed ML has already given the technological function.
	<u>160ai, 160aiii, 160e, 160f</u>	<u>carotenoids</u>	<u>200 mg/kg</u>	Indonesia proposes to add carotenoids as colour with the ML of 200 mg/kg. We permit the use of this food additive and the proposed ML has already given the technological function.
	<u>163</u>	<u>Anthocyanins</u>	<u>400 mg/kg (as anthocyanin)</u>	Indonesia proposes to add Anthocyanins as colour with the ML of 400 mg/kg. We permit the use of this food additive and the proposed ML has already given the technological function.

Agenda Item 7a Proposed Draft Regional Standard For Laver Products

4. FOOD ADDITIVES

[4.2 Seasoned Laver Products]

Food Additives except colors used in accordance with Tables 1 and 2 of the *Codex General Standard for Food Additives* in food category 04.2.2.2 and 04.2.2.8 or listed in Table 3 of *the General Standard for Food Additives* are acceptable for use in this product.

Indonesia would like to proposes some comment for the use of food additives as mentioned at Table.

Food category 04.2.2.2 :

Functional Class	INS	Name of Food Additives	Maximum Level	Indonesia Comment
preservatives	200-203	Sorbic Acid and Its Salts	500, as sorbic acid	Indonesia proposes to add sorbic acid and its salt as preservatives with The ML of 500 mg/kg as sorbic acid. We permit the use of this food additive and the proposed ML has already given the technological function.
	220-225, 227-228	Sulphites	100,as SO2 residue	Indonesia proposes to add sulphites as preservatives with The ML of 100mg/kg as SO2 residu. We permit the use of this food additive and the proposed ML has already given the technological function.
Colour retention	504i	Magnesium carbonate	1250, as total magnesium (Mg)	Indonesia proposes to add megnesium carbonate as colour retention with The ML of 1250 mg/kg as as total magnesium. We permit the use of this food additive and the proposed ML has already given the technological function.
	528	Magnesium hydroxide	1250, as total magnesium (Mg)	Indonesia proposes to add megnesium hydroxide as colour retention with The ML of 1250 mg/kg as as total magnesium. We permit the use of this food additive and the proposed ML has already given the technological

Functional Class	INS	Name of Food Additives	Maximum Level	Indonesia Comment
				function.
sweetener	960	Steviol Glycosides	40 as steviol equivalent	Indonesia proposes to add steviol glycosides as sweetener with The ML of 40 mg/kg as steviol equivalent. We permit the use of this food additive and the proposed ML has already given the technological function.
	951	Aspartame	1000	Indonesia proposes to add aspartame as sweetener with The ML of 1000 mg/kg. We permit the use of this food additive and the proposed ML has already given the technological function.
	955	Sucralose/trichlorogalactosucrose	150	Indonesia proposes to add sucralose as sweetener with The ML of 150 mg/kg. We permit the use of this food additive and the proposed ML has already given the technological function.
colouring	101i-iii	Riboflavins	150, as Riboflavins	Indonesia proposes to add riboflavins as colouring with The ML of 150 mg/kg as riboflavins. We permit the use of this food additive and the proposed ML has already given the technological function.
	140	Chlorophyll	GMP	Indonesia proposes to add chlorophyll as colouring with The ML of GMP. We permit the use of this food additive and the proposed ML is safe because this food additives has ADI value "not limited "
	150a	Caramel I – plain	GMP	Indonesia proposes to add caramel I-plain as colouring with The ML of GMP. We permit the use of this food additive and the proposed ML is safe because this food additives has ADI value "not specified "
	160bi	Annatto extracts, bixin based : Aqueous Processed Bixin, Solvent-Extracted Bixin, Oil-Processed Bixin	20, as bixin with notbixin 28% to bixin	Indonesia proposes to add Annatto extracts, bixin based : Aqueous Processed Bixin, Solvent-Extracted Bixin, Oil-Processed Bixin as colouring with 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.
	160ai, 160aiii, 160e, 160f	Carotenoids	200	Indonesia proposes to add carotenoids as colouring with The ML of 200 mg/kg. We permit the use of this food additive and the proposed ML has already given the technological function.
	162	Beet red	GMP	Indonesia proposes to add beet red as colouring with The ML of GMP. We permit the use of this food additive and the proposed ML is safe because this food additives has ADI value "not specified "
	163	Anthocyanins	1000, as anthocyanins	Indonesia proposes to add anthocyanins as colouring with The ML of 1000 mg/kg as anthocyanins. We permit the use of this food additive and the proposed ML has already given the technological function.

Food category 04.2.2.8

Functional class	INS	Name of food additives	Maximum Level	Indonesia Comment
preservatives	200-203	Sorbic Acid and Its Salts	1000, as sorbic acid	Indonesia proposes to add Sorbic Acid and Its Salts as preservatives with The ML of 1000 mg/kg as sorbic acid. We permit the use of this food

Functional class	INS	Name of food additives	Maximum Level	Indonesia Comment
				additive and the proposed ML has already given the technological function.
	220-225, 227-228	Sulphites	200, SO ₂ residue	Indonesia proposes to add Sulphites as preservatives with The ML of 200 mg/kg as so ₂ residue. We permit the use of this food additive and the proposed ML has already given the technological function.
Colour retention	504i	Magnesium carbonate	625, as total magnesium (Mg)	Indonesia proposes to add Magnesium carbonate as colour retention with The ML of 625 mg/kg as total magnesium. We permit the use of this food additive and the proposed ML has already given the technological function.
	528	Magnesium hydroxide	625, as total magnesium (Mg)	Indonesia proposes to add Magnesium hydroxide as colour retention with The ML of 625 mg/kg as total magnesium. We permit the use of this food additive and the proposed ML has already given the technological function.
sweetener	960	Steviol Glycosides	40, as steviol equivalent	Indonesia proposes to add Steviol Glycosides as sweetener with The ML of 40 mg/kg as steviol equivalent. We permit the use of this food additive and the proposed ML has already given the technological function.
	954	Saccharins	160	Indonesia proposes to add Saccharins as sweetener with The ML of 160 mg/kg. We permit the use of this food additive and the proposed ML has already given the technological function.
	955	Sucralose/trichlorogalactosucrose	150	Indonesia proposes to add Sucralose/trichlorogalactosucrose as sweetener with The ML of 150 mg/kg. We permit the use of this food additive and the proposed ML has already given the technological function.
colouring	101i-iii	Riboflavins	100, as riboflavins	Indonesia proposes to add Riboflavins as colouring with The ML of 100 mg/kg. We permit the use of this food additive and the proposed ML has already given the technological function.
	140	Chlorophyll	CPPB	Indonesia proposes to add chlorofyll as colouring with The ML of GMP. We permit the use of this food additive and the proposed ML is safe because this food additives has ADI value "not limited"
	150a	Caramel I – plain	CPPB	Indonesia proposes to add caramel I-plain as colouring with The ML of GMP. We permit the use of this food additive and the proposed ML is safe because this food additives has ADI value "not specified "
	160bi	Annatto extracts, bixin based : Aqueous Processed Bixin, Solvent-Extracted Bixin, Oil-Processed Bixin	20, as bixin with notbixin 28% to bixin	Indonesia proposes to add Annatto extracts, bixin based : Aqueous Processed Bixin, Solvent-Extracted Bixin, Oil-Processed Bixin as colouring with The ML of 20 mg/kg 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.
	160ai, 160aiii, 160e, 160f	Carotenoids	200	Indonesia proposes to add Carotenoids as colouring with The ML of 200 mg/kg. We permit the use of this food additive and the proposed ML has already given the technological function.
	162	Beet red	CPPB	Indonesia proposes to add beet red as colouring with The ML of GMP. We permit the use of this

Functional class	INS	Name of food additives	Maximum Level	Indonesia Comment
				food additive and the proposed ML is safe because this food additives has ADI value "not specified "
	163	Anthocyanins	500, as Anthocyanins	Indonesia proposes to add Anthocyanins as colouring with The ML of 500 mg/kg as Anthocyanins. We permit the use of this food additive and the proposed ML has already given the technological function.

Agenda Item 8a Status of implementation of the Strategic Plan for the CCASIA 2010-2014

Indonesia would like submit some activities as implementation of the Strategic Plan for the CCASIA 2010-2014.

For Action 1.6:

- Indonesia held national seminars on Codex activities for all stakeholders to recognize the importance of Codex.
- Indonesia co-hosted one Codex Committee meeting, i.e. CCFFP in 2012, and plan to be co-hosted one Codex Committee meeting, i.e CCNFSDU in next November 2014.

For Action 4.3:

- Indonesia led the eWGs for preparing Proposed Regional Standard for Tempe.
- Indonesia with France, as co-chair, led the eWG to review standards follow-up formula.
- Indonesia with India lead the eWG for preparing Proposed Draft Standard on Black, White, Green Pepper
- Indonesia lead the eWG to review of Mycotoxins in spices for prioritization of the work in spices

For Action 4.4:

Indonesia has submitted data on arsenic in rice to WHO GEMs/Foods.

For Action 5.2:

For disseminating of relevant information on Codex, Indonesia has conducted seminars on the importance of Codex standards and activities, and has updated information on Codex Work at national Codex website.

Agenda Item 8b Draft Strategic Plan for the CCASIA 2015-2020

Goal

Considering the activity of each goal and objective, Indonesia proposes to change the sequence of goal. The goal number 4 is proposed to be number 2.

The new sequence of goal is into:

1. To promote contribution of Asian Members to the work of the Codex Alimentarius Commission (CAC) and its subsidiary bodies (Objective 1);
2. To improve the scientific and technical capacities of the Asian Members (Objective 5 and 6)
3. To Enhance communication and coordination Among Asian Members (Objective 2); and
4. To Obtain the maximum benefit from Codex activities (Objective 3 and 4).

Rationale: With new sequence, goal number 1,2,3 are goal to increase the participation of Asian countries in Codex works, and goal number 4 related to how to use of Codex Standards and related texts as a basis for national legislation.

OBJECTIVE 1:

- Indonesia agrees to open the square brackets of **[and the FAO / WHO expert bodies]**. Rationale: It will encourage Asian countries to participate in Codex activities and subsidiary bodies and expert bodies, so that Asian countries are also active in the preparation of scientific data to support the preparation of Codex standards.
- Indonesia proposes to change the rationale to be:

~~To achieve~~ maximum participation and submit appropriate comments and data from Asian Members are essential for making sound decision at the sessions of CAC and its subsidiary bodies **and the FAO/WHO expert bodies.**"

- Indonesia proposes to change sequence of activity 1.4 to be 1.1

Rationale: Before other activities, an understanding of the Codex rules and procedural manuals are the basic of all other activities.

OBJECTIVE 2:

Indonesia agrees to open the square brackets of the Activity 2.2.

Rationale: Indonesia agrees that CCASIA only have one website which will be always maintained by different CCASIA coordinator, that history of the CCASIA activities can be traced. For implementation, including to solve the security problem as the reason of Japan could not continue website which built by Indonesia, we need build the good system for CCASIA website which can be operated by a different CCASIA coordinator.