

Food Safety Issues and Border Rejections in Indonesia's Spice Exports to Europe

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Director of Food Safety and Quality Standard Control
National Food Agency

Delivered on:

Seminar of Sustainable Spices Initiative Indonesia

Tangerang
October 10, 2024





REGULATIONS



National Food Control System for Fresh Food

Mandate for ensuring of Safety, Quality, Nutrition, Labels, and Advertisement of Fresh Food (Food Law No. 18/2012)

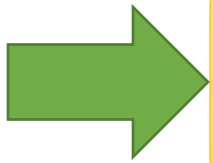
Article 108, Paragraph 3 (c):

Food Governing Body has the authority to control food safety aspects on fresh food, which including:

- Food Safety Standards, Food Quality, and Food Nutrition
- Food Labeling and Advertisement Standards

Article 149:

when this Law comes into effect, existing government body dealing with food at the time of this Law's enactment will continue to carry out their duties until a food governing body is established based on the provisions of this Law.



The Food Governing Body mentioned this regulation is the National Food Agency (based on Presidential Regulation 66/2021)

The NFA's Role in the Control of Food Safety

Food Law No. 18/2012

Article 108, Paragraph 3 (c):

Food institutions are given the authority to control the safety of fresh food, including:

- Food Safety Standards, Food Quality, and Food Nutrition
- Labeling and Advertisement Standards for Food

Presidential Regulation Number 66 of 2021 on the National Food Agency

Article 2:

The NFA has the duty to carry out government responsibilities in the food sector

Article 3:

- The NFA does the coordination functions
- The NFA does formulation, stipulation, and implementation of food safety policy.

- ❑ Registration and Certification
- ❑ Control of all fresh food



Deputy for Consumption Diversification and Food Safety

Directorate of Food Consumption Diversification

- ❑ Food consumption analysis
- ❑ Strengthening food diversification
- ❑ Promotion and Education of Food Consumption Patterns

Directorate of Food Safety and Quality Standards Formulation

- Cooperation and Harmonization of the safety and quality standards of Fresh Food
- Formulation of the safety and quality standards of fresh Food
- Formulation of standards for facilities to produce the Safe and Quality Food
- Food Safety Institutions

Directorate of Food Safety and Quality Standards Control

- ❑ Fresh Food Registration
- ❑ Surveillance
- ❑ Food Safety and Quality Control
- ❑ Facilities control
- ❑ Inspection and investigation into Food Safety Cases

 : Food safety guarantee

Regulations on Pre-Market Control

Registration Obligation

Based on Government Reg No 86/2019 on Food Safety



1. Food handler/FBO must fulfil sanitation standard to ensure food safety and/or human safety (Article 4)



2. Fresh plant-based food either produced domestically or imported, and distributed in labeled packaging must have registration number Article 38)

Law No. 11 of 2020 direvisi revised to Law No. 6 of 2023 on Stipulation of Government Regulation in Lieu of Law (PerPu) No.2 of 2023 on Job Creation



Government Regulation No. 5 of 2021 on the Implementation of Risk-Based Business Licensing

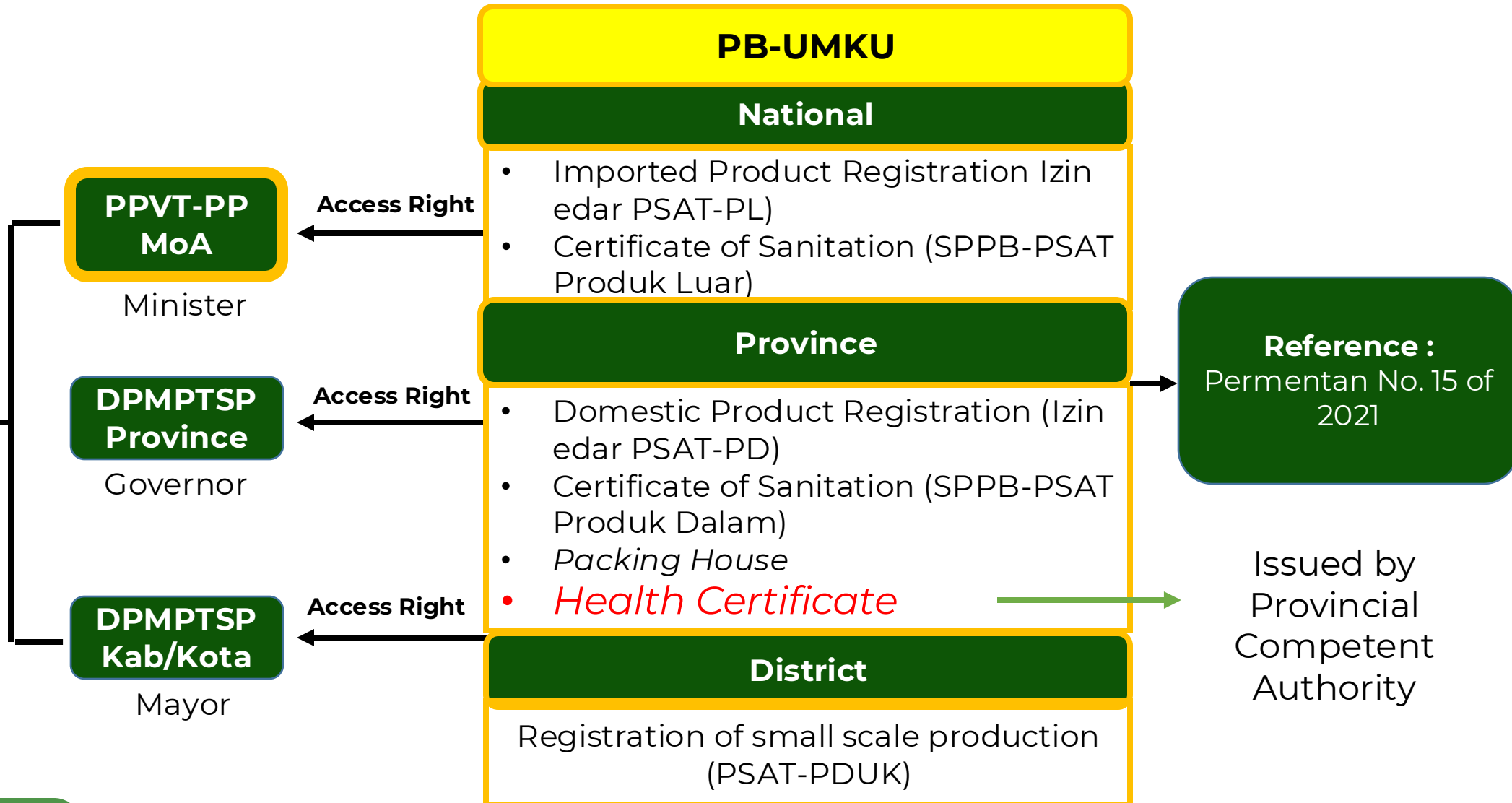
Article 36 (1)

Business Licensing in the agricultural sector consists of the following subsectors:

- Plantation Subsector
- Food Crops Subsector
- Horticulture Subsector
- Livestock and Animal Health Subsector
- **Food Security Subsector**
- Agricultural Infrastructure Subsector"

Carried out by the NFA

The Implementation of Business Licensing – Sub sector Food security Based on Government Regulation No 5 of 2021



Regulation on *Post-Market*



PERATURAN BADAN PANGAN NASIONAL REPUBLIK INDONESIA

NOMOR 2 TAHUN 2024

TENTANG

PENGAWASAN TERHADAP PEMENUHAN PERSYARATAN KEAMANAN, MUTU, GIZI, LABEL, DAN IKLAN PANGAN SEGAR

DENGAN RAHMAT TUHAN YANG MAHA ESA

KEPALA BADAN PANGAN NASIONAL REPUBLIK INDONESIA,

Menimbang : a. bahwa untuk melindungi masyarakat dari risiko peredaran pangan segar yang tidak memenuhi persyaratan keamanan, mutu, dan gizi serta informasi mengenai pangan segar yang tidak benar dan menyesatkan, perlu dilaksanakan pengawasan terhadap pemenuhan persyaratan keamanan, mutu, gizi, label, dan iklan pangan segar;
b. bahwa berdasarkan ketentuan Pasal 108 ayat (3) huruf c Undang-Undang Nomor 18 Tahun 2012 tentang Pangan, Badan Pangan Nasional berwenang untuk melakukan pengawasan terhadap pemenuhan persyaratan keamanan, mutu, gizi, label, dan iklan pangan segar;
c. bahwa berdasarkan pertimbangan sebagaimana dimaksud dalam huruf a dan huruf b, perlu menetapkan Peraturan Badan Pangan Nasional tentang Pengawasan terhadap Pemenuhan Persyaratan Keamanan, Mutu, Gizi, Label, dan Iklan Pangan Segar;

Mengingat : 1. Undang-Undang Nomor 18 Tahun 2012 tentang Pangan (Lembaran Negara Republik Indonesia Tahun 2012 Nomor 227, Tambahan Lembaran Negara Republik Indonesia Nomor 5360) sebagaimana telah beberapa kali diubah terakhir dengan Undang-Undang Nomor 6 Tahun 2023 tentang Penetapan Peraturan Pemerintah Pengganti Undang-Undang Nomor 2 Tahun 2022 tentang Cipta Kerja

NFA Regulation No 2 of 2024 and NFA Regulation No. 9 of 2024 Supervision of Compliance with Requirements for Safety, Quality, Nutrition, Labeling, and Advertising of Fresh Food

➔ Conducting control of fresh food requirements in distribution based on risk-based priority supervision

Supervision on:

1. Food safety;
2. Food quality;
3. Food nutrition;
4. Food labelling; and
5. Food advertising.

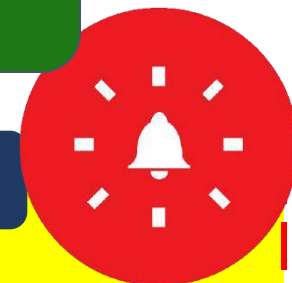
Fresh Food

Carried out through inspections of activities or processes:

1. Food production
2. Food storage
3. Food distribution
4. Food trade

Follow-up on Control

1. Imposing administrative sanctions in the case of violations (e.g., written warnings, revocation of licenses);
2. Taking samples;
3. Coordinating with relevant ministries;
4. Stopping advertising of related fresh food;
5. Providing guidance to business actors (farmers, livestock breeders, fishermen/aquaculture producers);
6. Reporting supervision results based on risk assessments



Food Safety Standard

NFA Regulation No 10 of 2024 on Maximum Level of Contaminants in Fresh Food

Proven by quantitative laboratory test results

Used as standards in the supervision of fresh food safety both pre-market and post-market

HEAVY METALS CONTAMINATION

- As** Arsenic
- Pb** Lead
- Cd** Cadmium

Spices (fresh and dry)
Cd 1 mg/kg
Pb 1,5 mg/kg

MICROBIAL CONTAMINATION

- 1. *Salmonella*;
- 2. *Listeria monocytogenes*;
- 3. *Eschericia coli* producing Shiga Toxin - STEC; and
- 4. *Bacillus cereus*.

Kelompok Pangan	Jenis Pangan	Parameter	n ⁽¹⁾	c ⁽²⁾	m ⁽³⁾	M ⁽⁴⁾
Rempah	Rempah Daun dan Rempah Lainnya (Kering)	<i>Salmonella</i>	5	0	Negatif/25 g	NA
		<i>Bacillus cereus</i>	5	2	10 ² koloni/g	10 ⁴ koloni/g

MYCOTOXINS CONTAMINATION

- 1. Aflatoxin B1;
- 2. Aflatoxin total;
- 3. Fumonisin; dan
- 4. Ocratoxin A (OTA)

Spices (dry)
Aflatoxin B1 15 µg/kg
Aflatoxin Total 20 µg/kg
Ocratoxin A 20 µg/kg



Indonesia's Spice Exports to Europe



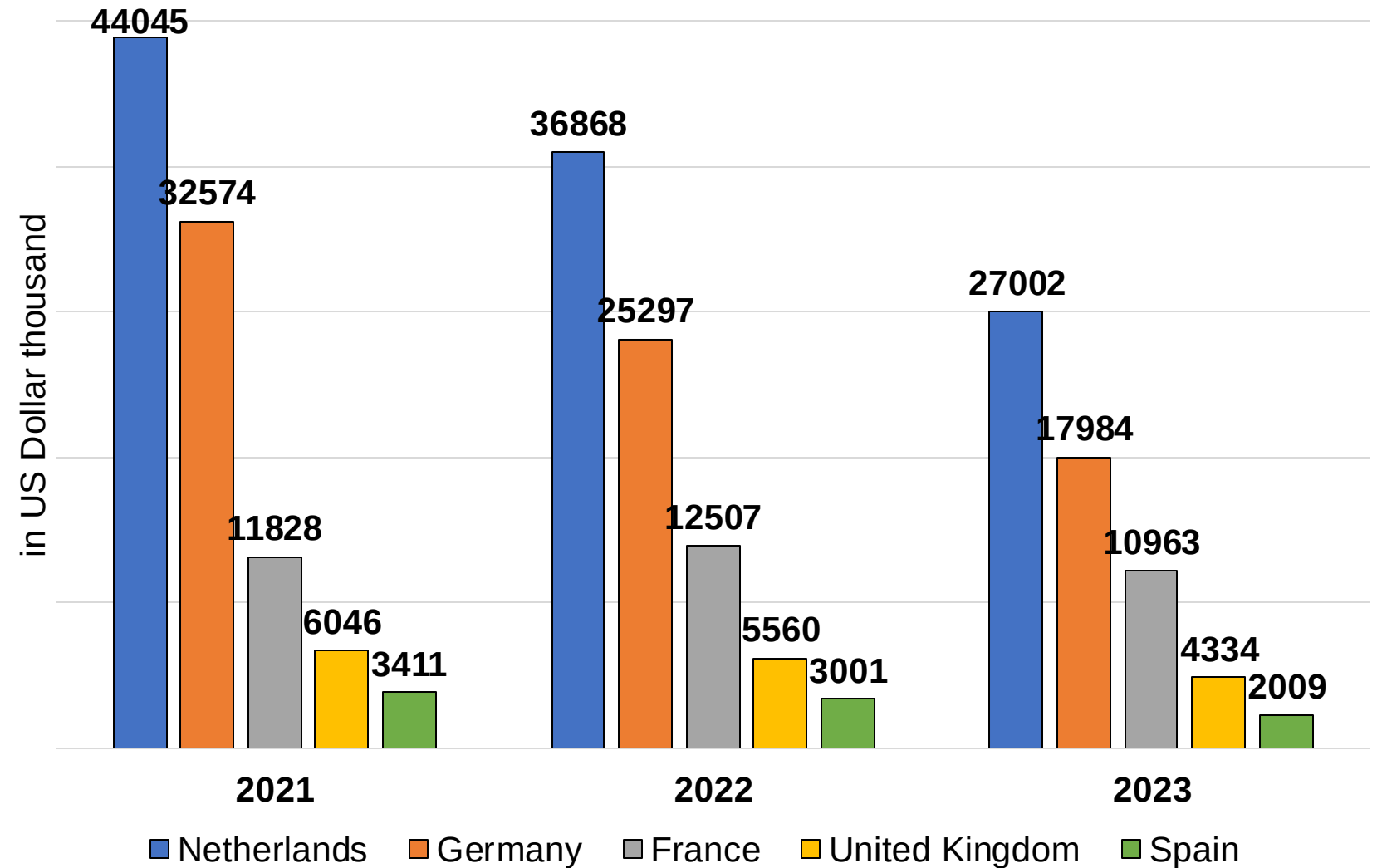
Indonesia's Agricultural Products Exports to Europe (US Dollar thousand)



Top 5 importing markets for spice exported by Indonesia

1. Netherland
2. Germany
3. France
4. United Kingdom
5. Spain

Source: trademap.org

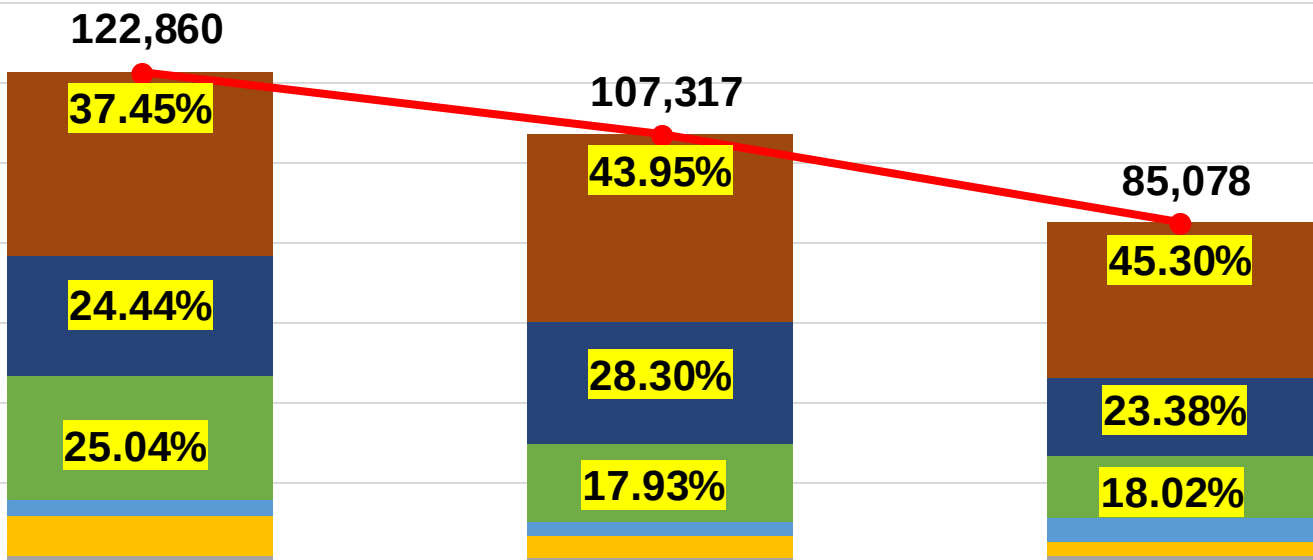


Indonesia's Spice Exports to Europe (US Dollar thousand)

Source: trademap.org



Top 3 Spice Comodities



	2021	2022	2023
Nutmeg	46,008	47,167	38,543
Cinnamon	30,027	30,367	19,890
Pepper, fruits of the genus capcisum or the genus pimenta	30,766	19,244	15,329
Cloves	4,347	3,833	6,073
Vanilla	9,774	5,170	3,472
Ginger, saffron, tumeric, mixtures of spices	1,923	1,330	1,592
Cardamoms	15	201	171
Juniper berries and seeds of anise, badian, caraway or fennel, coriander, cumin	-	5	8
TOTAL	122,860	107,317	85,078

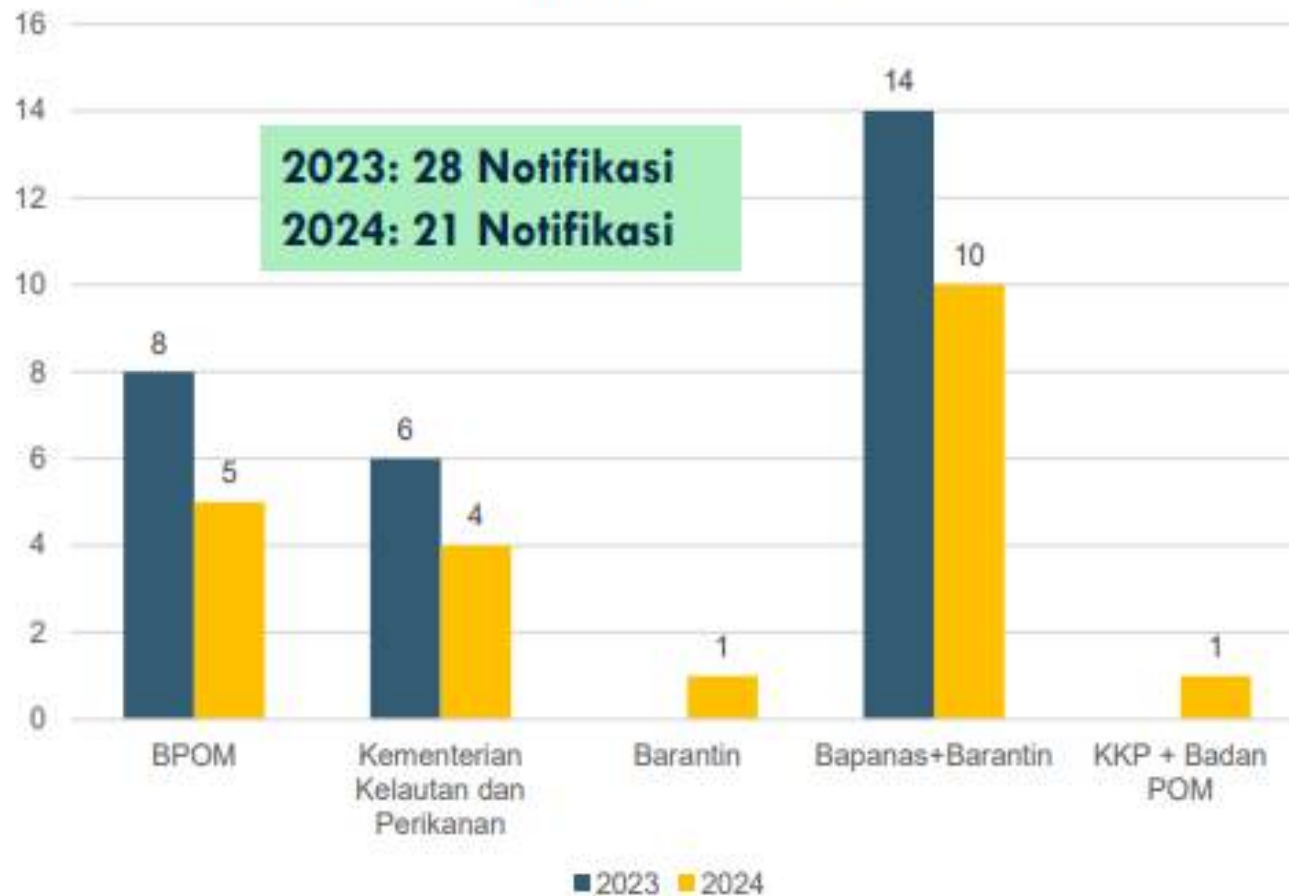


Border Rejections

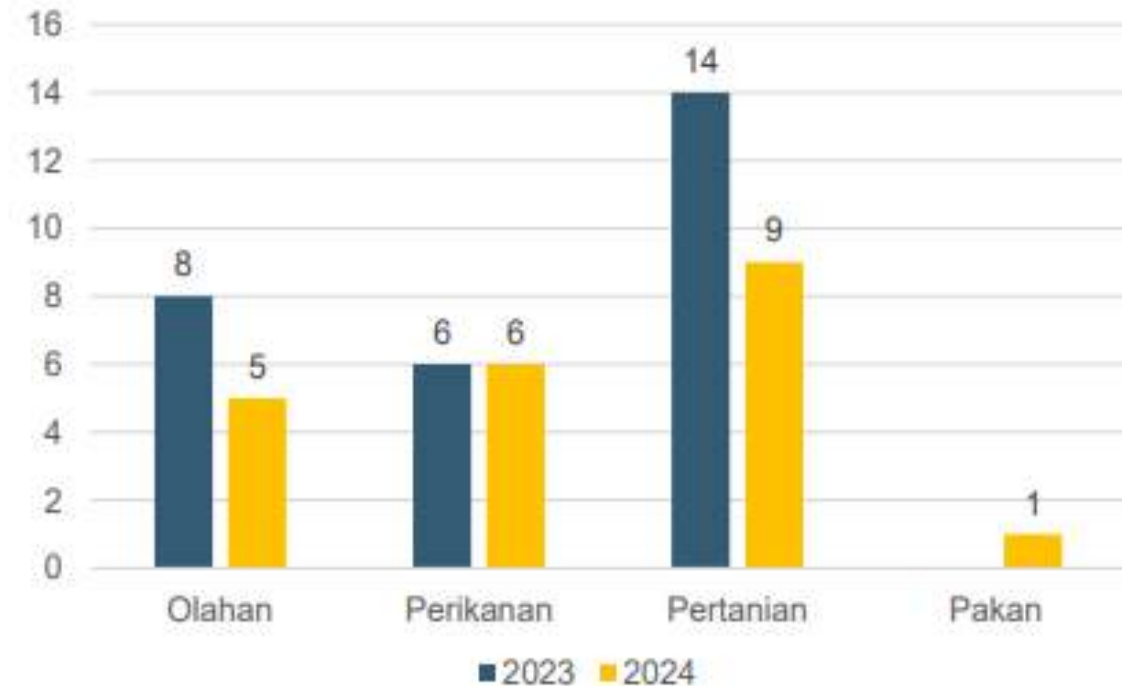


NOTIFICATIONS BASED ON INRASFF

**Klasifikasi Notifikasi berdasarkan CCP INRASFF
Tahun 2023-2024**



**Klasifikasi Notifikasi berdasarkan Jenis Produk
Tahun 2023-2024**

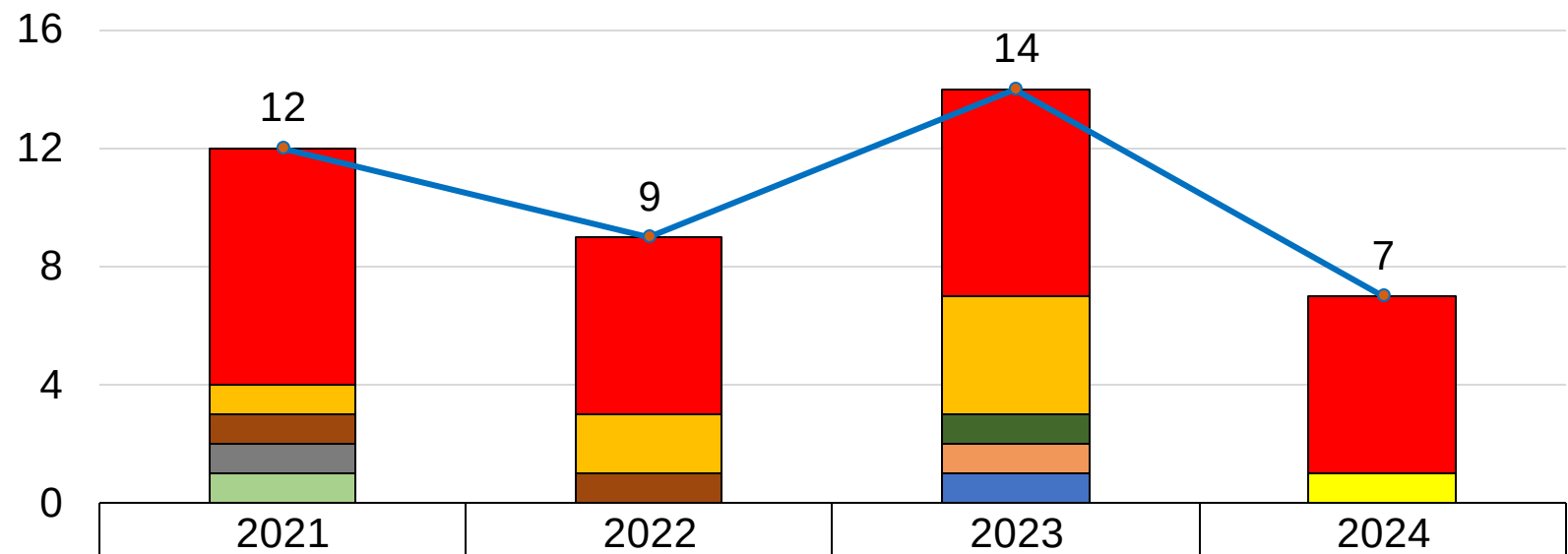


Source : BPOM, 2024

INRASFF (Indonesia Rapid Alert System for Food and Feed)

Border Rejection Notification For Spice Exported by Indonesia to Europe

Source : inrasff.pom.go.id



Reason for rejection:

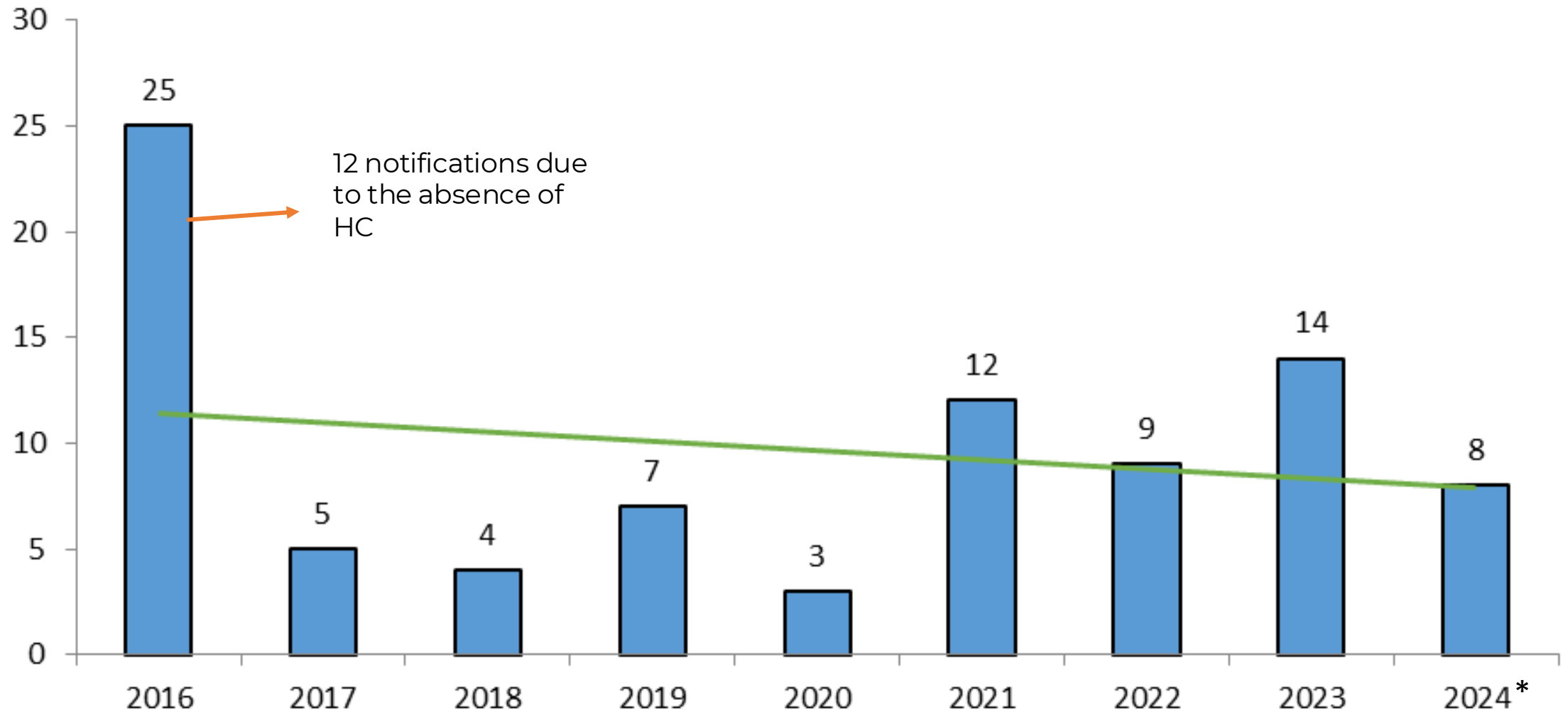
Chemical contamination (mycotoxin) that did not comply with the EU regulation

Commodity notified

(2021 – 2024):

- 1. Nutmeg (40 cases)**
- 2. Black Pepper (1 case)**

Notification of Nutmeg Rejection



Increased inspection frequency up to 20%

OKKP mandates the issuance of HC for nutmeg to be exported to the EU

* data as of October 7, 2024

Source : INRASFF

Health Certificate Requirement For Exports to the EU

- Issued by the competent authority of the exporting country (Indonesia: at Province level);
- Certifying that the goods meet the food safety standards required by the European Union; and
- This document ensures that products comply with EU regulations and are safe for consumption or use within EU member states.



10685

KEDUTAAN BESAR REPUBLIK INDONESIA
BRUSSEL

Boulevard de la Woluwe 38 - 1200 Brussel, Telp. (+32) 2 775 01 20, 2 779 09 15
Fax. (+32) 2772 82 10, <http://www.kemlu.go.id/brussel>, email: kbri.brussel@skynet.be

Kepala Perwakilan RI

BERITA BIASA

KILAT


Andri Hadi
Duta Besar RI LBPP

Nomor : B-00079/Brussel/230306
Kepada Yth. : 1. Menteri Luar Negeri u.p. Dirjen Amerop, PIt. Sahli Bidang Diplomasi Ekonomi
2. Menteri Pertanian u.p. Sekjen, Dirjen Perkebunan, Ka Barantan
3. Kepala Badan Pangan Nasional u.p. Sestama, Deputi PKKP
4. Kepala Badan POM u.p. Sestama, Deputi PPO
Info Yth. : 1. Dir. Eropa 1, Dir. KSI Amerop, Dir. PKKI, Dir. HPE - Kemenlu
2. Karo KLN, Dir. Tanhun dan Penyegar, Dir. PPH Bun, Kapus KTKHN - Kementan
3. Dir. PSKMP, Dir. PPSKMP - Bapanas
4. Dir. PPPO - BPOM
5. Keppris UE
Dari : Duta Besar RI Brussel
Jumlah : 4 halaman
Perihal : Notifikasi RASFF Komoditas Pala Indonesia Periode Januari-Februari 2023 dan Laporan Pertemuan dengan FASFC Pos Pelabuhan Antwerp Belgia

Ringkasan Berita

Notifikasi temuan aflatoxin pada sistem *EU Rapid Alert System for Food and Feed* (RASFF) menunjukkan peningkatan pada periode Januari-Februari 2023 ini sebanyak 6 notifikasi dengan potensi *border rejection*. Salah satu notifikasi berasal dari Belgia sehingga pada tanggal 1 Maret 2023, KBRI Brussel melakukan pertemuan online dengan *the Federal Agency for the Safety of Food Chain* (FASFC) Pos Pelabuhan Antwerp Belgia untuk membahas metode pengambilan sampel pala dari Indonesia yang dilakukan FASFC di pelabuhan yang ditengarai ada perbedaan dengan metode di Indonesia. Pertemuan menggarisbawahi kiranya perlu dilakukan upaya perbaikan penanganan ekspor pala ini dari hulu ke hilir oleh instansi terkait untuk menghindari temuan ulang dan kenaikan frekuensi pengecekan oleh otoritas pelabuhan di Uni Eropa dari saat ini 30% menjadi 50%.

Merujuk perihal tersebut di atas, dengan hormat disampaikan hal-hal sebagai berikut:

Demikian disampaikan, atas perhatian dan arahan lebih lanjut dari pusat kami ucapkan terima kasih.

Petugas Komunikasi

Farhan Dwi Putra

Brussel, Maret 2023

Pembuat Berita

Arief Rachman
Atase Pertanian

Brafax Number: B-00079/Brussel/230306 in March 2023 regarding RASFF Notification of Indonesian Nutmeg Commodities for the Period of January-February 2023

There has been a significant increase in the findings of aflatoxin/ochratoxin fungi in Indonesian nutmeg commodities exported to the EU (4 notifications in Q1 2022 increased to 6 notifications in Q1 2023).

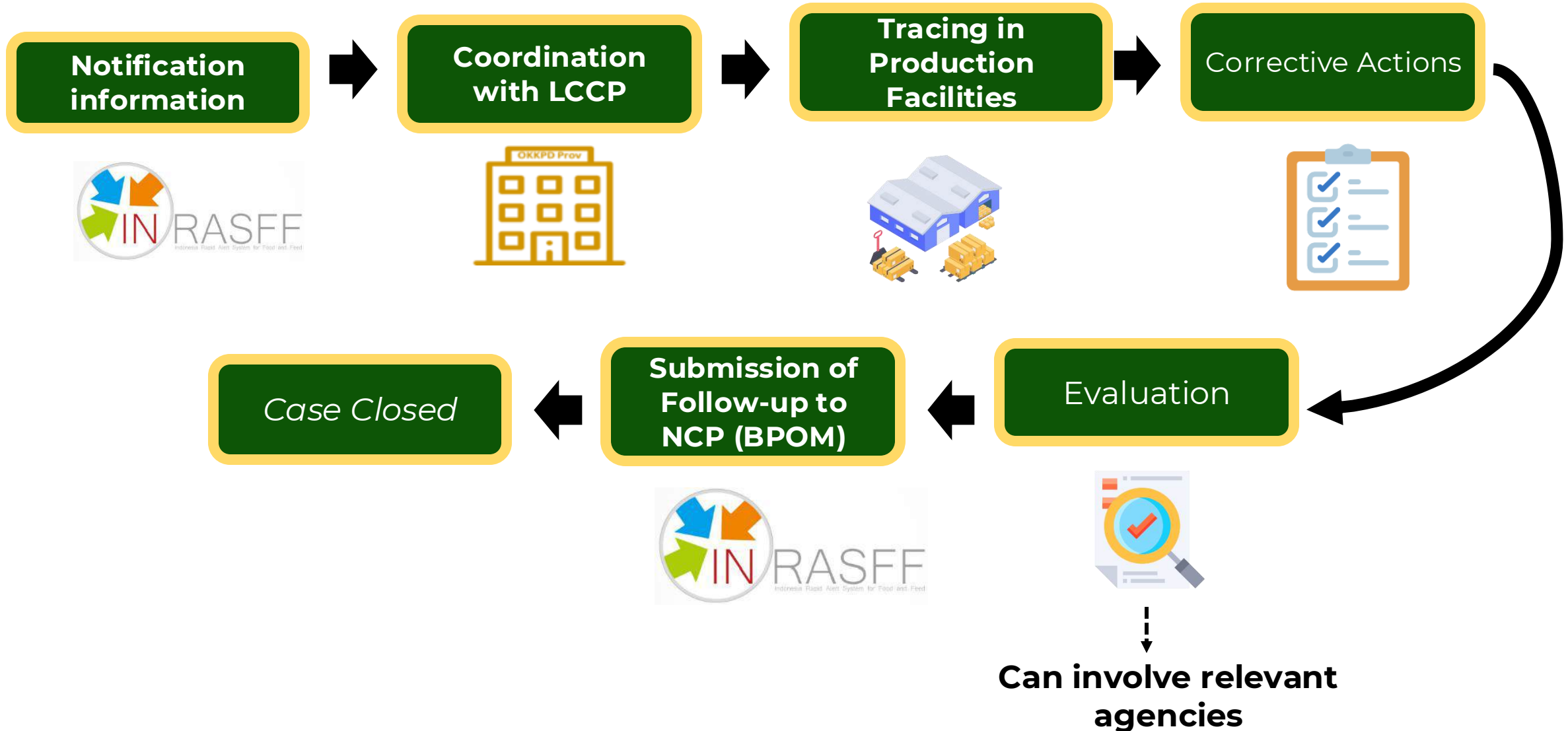
Efforts for improvement are needed from upstream to downstream to avoid an increase in sampling frequency from 30% to 50%.



NFA's Strategies on Spices Notifications



Handling of INRASFF Notifications



Several Corrective Actions for INRASFF Notifications

- Tighten supervision at the raw material acceptance stage by increasing the number of sampled products.
- Conduct sorting and screening using UV light.
- Add trained personnel with experience for sorting.
- Conduct internal testing before testing by the OKKPD for HC issuance.
- Tighten delivery times.
- Verify the laboratory testing of nutmeg exports to the European Union.



Notification Status

INRASFF | Downstream

Source: https://inrasff.pom.go.id/

← → ↺

https://inrasff.pom.go.id/backadmin/downstreams

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Dashboard

PROSES BISNIS

Down Stream

Up Stream

Kalender I-CAN

FRONT END

Berita

MASTER DATA

Pengguna

Lembaga

🌙

Apriyanto Dwi Nugroho, STP, MSc
Competent Contact Point / Kementerian Pertanian

Downstream | Downstream

25

Cari...

#	NOMOR	JUDUL	TANGGAL DIBUAT	TANGGAL SELESAI	STATUS	AKSI
1	IN.DS.082141694	Indonesian export of "GREEN MUNG BEANS (PHASEOLUS AUREUS)" was found to contain pesticide residues that did not comply with regulations (IN.DS.2024.43.IFB13KK0651202)	19 Agustus 2024 15:21:41	27 September 2024 02:56:05	Selesai	
2	IN.DS.080544197	Indonesian export of "GREEN MUNG BEANS" was found to contain pesticide residues that did not comply with regulations (IN.DS.2024.42.IFBGK0386603)	19 Agustus 2024 15:05:44	27 September 2024 02:56:47	Selesai	
3	IN.DS.075104962	Indonesian export of "GREEN MUNG BEAN" was found to contain pesticide residues that did not comply with regulations (IN.DS.2024.41.IFK13330042801)	19 Agustus 2024 14:51:04	27 September 2024 02:56:58	Selesai	

Notification Status

Source: https://inrasff.pom.go.id/

Apriyanto Dwi Nugroho, STP, MSc

Competent Contact Point / Kementerian Pertanian

4	IN.DS.071941580	Indonesian export of "GREEN MUNG BEAN" was found to contain pesticide residues that did not comply with regulations (IN.DS.2024.40.IFB13HK0051901)	19 Agustus 2024 14:19:41	27 September 2024 02:57:14	Selesai	
5	IN.DS.011652981	Aflatoxine B1 in Nutmeg (IN.DS.2024.44.5995)	7 Agustus 2024 08:16:52	-	Proses CCP	
6	IN.DS.021931280	Nutmeg Indonesia Ochratoxin A (IN.DS.2024.38.5497)	24 Juli 2024 09:19:31	-	Proses CCP	
7	IN.DS.065428161	Ochratoxin A in nutmeg from Indonesia (IN.DS.2024.37.5049)	8 Juli 2024 13:54:28	-	Proses CCP	
8	IN.DS.071356469	Dioxins in vinasse from Indonesia (IN.DS.2024.34.1902)	13 Juni 2024 14:13:56	-	Proses CCP	
9	IN.DS.034512768	Aflatoxins in nutmeg from Indonesian (IN.DS.2024.33.3959)	27 Mei 2024 10:45:12	20 Agustus 2024 09:05:35	Selesai	
10	IN.DS.083109641	Aflatoxins in Indonesian nutmeg (IN.DS.2024.31.3795)	15 Mei 2024 15:31:09	20 Agustus 2024 09:05:21	Selesai	
11	IN.DS.064453793	Aflatoxins in Indonesian nutmeg (IN.DS.2024.30.3299)	25 April 2024 13:44:53	30 Juni 2024 13:37:47	Selesai	↑



Notification Status

Source: <https://inrasff.pom.go.id/>

Apriyanto Dwi Nugroho, STP, MSc
Competent Contact Point / Kementerian Pertanian



11	IN.DS.064453793	Aflatoxins in Indonesian nutmeg (IN.DS.2024.30.3299)	25 April 2024 13:44:53	30 Juni 2024 13:37:47	Selesai	
12	IN.DS.071348596	Unauthorised substances acephate, methamidophos and triazophos in dragon fruit from Indonesia (IN.DS.2024.24.1916)	21 Maret 2024 14:13:48	20 Agustus 2024 09:05:07	Selesai	
13	IN.DS.031309743	Cadmium in mangistan (IN.DS.2024.14.0796)	6 Februari 2024 10:13:09	6 Mei 2024 03:07:30	Selesai	
14	IN.DS.020225225	Mercury and Mineral Oil Hydrocarbons in Ground Cinnamon, from Indonesia (IN.DS.2023.06.8251)	27 Januari 2024 09:02:25	6 Mei 2024 01:50:32	Selesai	
15	IN.DS.040205025	Aflatoxins in nutmeg Indonesia GGB 23128932 (IN.DS.2024.01.0032)	5 Januari 2024 11:02:05	13 Maret 2024 02:53:09	Selesai	

Note:

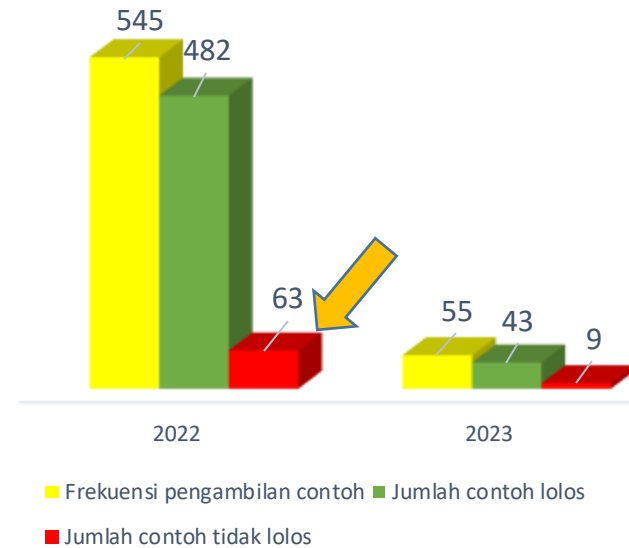
- 10 notifications from EU (8 cases of nutmeg, 1 case of dragon fruit, and 1 case of mangosteen)
- 5 notifications from Taiwan

The Role of OKKP in Issuance of HC

Guidelines for HC Issuance EU REGULATION 401/2006

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

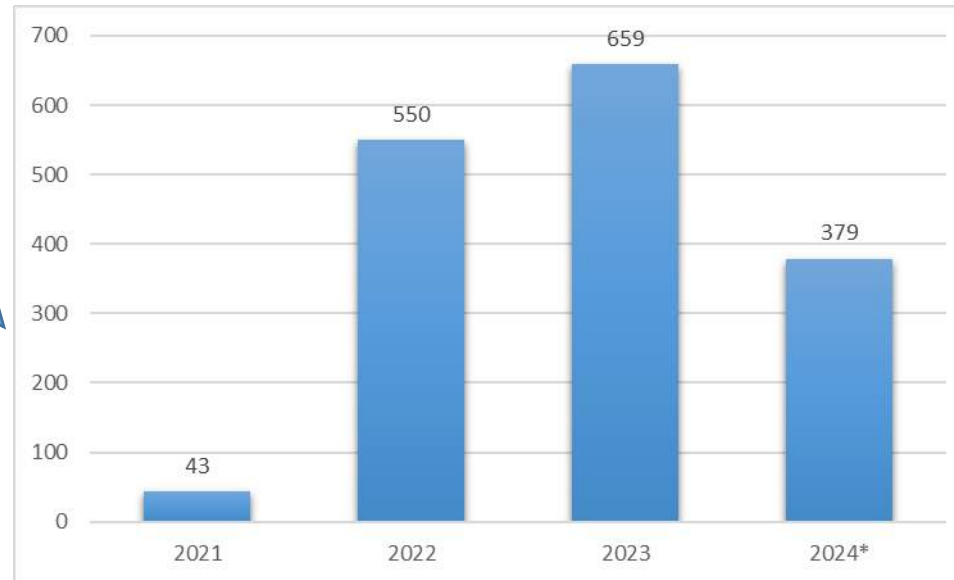
Lot weight (tonnes)	No of incremental samples	Aggregate sample Weight (kg) (in case of retail packings, weight of aggregate sample can diverge — see point D.2.1)	No of laboratory samples from aggregate sample
≤ 0,1	10	2	1 (no division)
> 0,1 – ≤ 0,2	15	3	1 (no division)
> 0,2 – ≤ 0,5	20	4	1 (no division)
> 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



In the process of HC issuance by OKKPD before nutmeg is shipped to the EU, if nutmeg is found to have aflatoxin/ochratoxin levels exceeding EU standards, HC will not be issued.

Sampling reduces the risk of rejection by 12% in 2022 and 16% in 2023

the number of HC issued by OKKP



Source : SIPSAT
Data as of 7 October 2024



HC Issuance and HC Export Volume for 2021

No.	Province	Total HC	Notification of HC	%	Volume (Kg)	Rejected Volume (Kg)	%
1	Jawa Timur	288	5	1,7%	2,316,712.20	9,700	0,42%
2	Sulawesi Utara	115	1	0.87%	1,054,630	4,000	0,39%
3	DKI Jakarta	46	1	2,17%	240,500	5,000	2,1%
4	Lampung	3	0	0%	22,975	0	0%
5	Jawa Tengah	28	2	7,2%	172,000	8,000	4,7%
6	OKKPP	16	-	0%	82,000	0	0%
	Total	496	9	1,81%	1,572,105	17,000	1,08%

consecutively

OT HC Issuance

**BADAN PANGAN NASIONAL**
NATIONAL FOOD AGENCY
Jalan Harsono RM Nomor 3 Ragunan, Pasar Minggu Jakarta 12550
Telepon (021) 7804476, 7807377, 7802619, 7804367 Faksimili (021) 7802619
Website: <http://badanpangan.go.id/>
Email: nfa_official@badanpangan.go.id

Nomor : B-553/KN.230/J/05/2022
Lampiran : -
Hal : Tindak lanjut penerbitan *Health Certificate*
dan notifikasi ekspor pala Indonesia

30 Mei 2022

Yth.
Kepala Dinas yang Menangani Urusan Pangan
di
Seluruh Indonesia

Menindaklanjuti rapat tentang penerbitan *Health Certificate* (HC) dan notifikasi ekspor pala Indonesia yang dilaksanakan pada hari Kamis 19 Mei 2022, bersama ini kami sampaikan hal-hal untuk dijadikan pedoman sebagai berikut:

1. Sesuai dengan Peraturan Pemerintah No. 5 Tahun 2021 tentang Perlizinan Berusaha Berbasis Risiko, penerbitan HC dilakukan oleh OKKPD sesuai kewenangan yang diberikan oleh Gubernur;
2. Pengambilan sampel dilakukan sesuai dengan EU Regulation 406/2006 oleh Petugas Pengambil Contoh (PPC) yang terlatih;
3. Apabila dari hasil pengujian sampel sebelum ekspor ditemukan ketidaksesuaian sebanyak 2 (dua) kali berturut-turut, OKKPD meminta pelaku usaha untuk melakukan perbaikan dan melaporkan hasilnya kepada OKKPD;
4. Penerbitan HC akan ditangguhkan sampai dengan adanya hasil perbaikan yang telah dilakukan oleh pelaku usaha dan disampaikan kepada OKKPD;
5. OKKPD dan pelaku usaha secara bersama-sama melakukan verifikasi terhadap perbaikan yang dilakukan dan dilaporkan oleh pelaku usaha;
6. OKKPD melaporkan temuan ketidaksesuaian dan tindakan perbaikan kepada Badan Pangan Nasional selaku OKKP Pusat.

Atas perhatian dan kerjasama Saudara kami sampaikan terimakasih.


Pit Sekretaris Utama,
Dr. Sarwo Edhy, SP, MM
NIP 196203221983031001

Tembusan:
Kepala Badan Pangan Nasional

If two non-conformities are detected consecutively based on lab analysis, the issuance of HC will be postponed until the business operator makes the corrective corrections.

Strategy for Reducing Nutmeg Export Notifications

- Orchard registration
- Guidelines for Good Nutmeg Cultivation
- Should implementation of GAP be mandatory for export?



1. NFA and Better Training for Better Food (BTSF) were organizing a Nutmeg Sampling Training on October 16–17, 2023 and Analysis on Mycotoxins in Nutmeg on October 18–20, 2023 in Bogor.
2. Speakers: Dr. Barbara de Santis and Dr. Francesca Debegnach from the Istituto Superiore di Sanità, Rome (ISS), Italy.

1. Improvement in the Land through the implementation of GAP

3. Improvements in Sampling by LCCP Officers

5. Establish food safety and quality testing laboratories in 5 (five) Provinces to support food inspection

2. Improvements in Nutmeg Handling at the Collector Trader Level

4. Improvement of laboratory in testing on nutmeg

Implementation of Sanitation for Collectors Supplying Exporters

**Makan Enak
Makan Sehat
Makan B2SA**



Badan Pangan Nasional

THANK YOU



#MakanEnakMakanSehatMakanB2SA

#IfItNotSafeItIsNotFood

#PanganKuatIndonesiaBerdaulat