

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of  
the United Nations



World Health  
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - Fax: (+39) 06 5705 4593 - E-mail: [codex@fao.org](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

CL 2015/2-MMP  
February 2015

**TO:** Codex Contact Points  
Interested International Organizations

**FROM:** Secretariat, Codex Alimentarius Commission  
Joint FAO/WHO Food Standards Programme  
Viale delle Terme di Caracalla, 00153 Rome, Italy

**SUBJECT:** **Request for Comments at Step 3: Proposed Draft Standard for Processed Cheese**

**DEADLINE:** **31 March 2015**

**COMMENTS:**

<b>To:</b> Codex Contact Point for New Zealand Ministry for Primary Industries Wellington New Zealand email: <a href="mailto:CodexNZ@mpi.govt.nz">CodexNZ@mpi.govt.nz</a>	<b>Copy to:</b> Secretariat Joint FAO/WHO Food Standards Programme Viale delle Terme di Caracalla 00153 Rome, Italy email : <a href="mailto:codex@fao.org">codex@fao.org</a>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

## BACKGROUND

1. The 37<sup>th</sup> Session of the Codex Alimentarius Commission agreed to reactivate the CCMMP to initially work by correspondence. The Commission further established a Physical Working Group (PWG) led by New Zealand and co-chaired by Uruguay and working in English and Spanish, to prepare a proposed draft standard for circulation for comments at Step 3.<sup>1</sup>
2. The PWG met in January 2015 and prepared a proposed draft standard for comments. The report of this PWG is attached at Appendix I.

## REQUEST FOR COMMENTS

3. Comments at Step 3 are hereby requested on Proposed Draft Standard for Processed Cheese (Appendix II).
4. Governments and international organizations wishing to provide comments should do so in writing **preferably by e-mail** to the above addresses before **31 March 2015**. Comments should be in accordance with the general guidance for the provision of comments (see Annex to this Circular Letter).

---

<sup>1</sup> REP14/CAC, para. 112

## Appendix I

**Report of the Physical Working Group on Processed Cheese  
Brussels, Belgium, 20-22 January 2015  
(for information)**

1. The physical working group met in Brussels, 20-22 January 2015 and was chaired by Dr Steve Hathaway (NZ) with Ms Daniela Escobar (Uruguay) as co-chair. 24 member countries, one member organisation and two observer organizations attended the working group. The list of participants is attached.
2. The chair of the working group provided background information on the work on processed cheese over the years in the CCMMP; the decision of the CAC37 for the PWG to develop a proposed draft standard for processed cheese; and the preparatory work undertaken by an electronic working group and the summary of comments made by member countries. He noted that from written comments received, issues relating to the use of gelatine and starches, composition, and food additives still remained controversial with member countries providing divergent views. Thus here were considerable challenges for the PWG in drafting a proposed standard to enter the Codex step-wise process
3. The co-chair also noted the general view of members in their written comments for the need for compromise and flexibility in order to develop the proposed standard.
4. The PWG first had a general discussion on the working draft that was circulated in September 2014.

**GENERAL DISCUSSION**

5. It was recognized that a number issues would require in depth consideration, such as the use of gelatine and starch, the composition of processed cheese and the permitted food additives.
6. It was noted by some delegations that the use of gelatine and starch and the use of some food additives pertained mainly to their established use in processed cheese spreads, but not processed cheese as envisaged in the proposed draft standard. A tighter definition of the scope of the Standard would provide clarity to the discussion on these issues.
7. The PWG further noted that many of the sections in the working draft deferred to national legislation, which was not appropriate as the aim of the Standard was to provide harmonized international provisions to facilitate trade.
8. The PWG agreed to firstly review the working draft in its entirety and square bracket controversial issues. The PWG then returned to those issues section by section to finalize the draft.

**SECTION-BY-SECTION DISCUSSION****1. Scope**

9. It was recognized that due to the wide range of processed cheese and processed cheese-like products or preparations being traded internationally, and the different designations assigned to these products, it would be difficult to cover all of these products under a general standard for processed cheese. It was also the understanding from the decision of the CAC36, that the scope should be limited to processed cheese as defined in section 2. In view of this, the PWG agreed to more clearly identify those products that were not covered by the Standard to avoid any misunderstanding on the scope. A new paragraph indicating examples of those products not covered by the Standard was developed.

**2. Description**

10. The PWG considered whether it was necessary to differentiate and provide descriptions for several categories of processed cheese, i.e. semi-solid and spreadable processed cheese; solid and sliceable processed cheese, for purposes of clarity and in particular to assist with further provisions on food additives and composition.
11. There were varying views on this matter. Some members of the PWG were of the opinion that description of these categories was not necessary as they were not otherwise referred to in the Standard. However, it was recognised that processed cheese came in varying textures.
12. Other members were of the view that it was necessary to retain the categories to facilitate understanding of the additives section, but that if the category descriptions were to be retained, reference to "high moisture" and "dry matter" should be deleted.
13. As a compromise and noting that the core issue was related to texture of processed cheese, the working group agreed to insert a footnote to indicate that varying processing technologies and composition could result in processed cheese with different textures, ranging from semi-solid to sliceable. This footnote was retained in square brackets for further consideration.

14. The PWG also considered a proposal from France to indicate that “*processed cheese could be obtained by processing techniques involving melting and emulsifying with the aid of heat of a mixture of the cheese and/or products obtained from milk which gives an end-product with similar physical, chemical and organoleptic characteristics as the product defined in a(i).*” France considered that this proposal would allow for future innovation and technological developments and would ensure that the Standard would remain current, even long into the future. It was also noted that this proposal was in line with the *General Standard for Cheese* (CODEX STAN 283-1978). The delegation of France requested its reservation be noted.

15. The PWG did not support this proposal as it would imply that processed cheese could be made from ingredients other than cheese. The PWG also noted that the CODEX STAN 283-1978 did not govern the production of processed cheese, but rather cheese, which was an ingredient of processed cheese.

16. The PWG agreed to retain a footnote 3 to clarify that emulsifying salts referred to in 2.1 (ii) do not function directly as emulsifiers. IDF provided reference to published information that emulsifying salts increase the emulsifying potential of casein by forming complex soluble salts and soluble alkaline paracaseinate (Na, K) from the casein cations which are available in the cheese as insoluble calcium paracaseinate. Thus the soluble alkaline paracaseinate obtained acts as an emulsifier and forms the emulsion (CL1997/32-MMP).

### **3 Essential composition and quality factors**

#### **3.1 Raw materials**

17. The PWG agreed to include a footnote to cheese in 3.1a (footnote 3) to clarify that cheese should maintain its intrinsic components.

18. The PWG considered a proposal of the United States of America to delete the list in 3.1c in the working draft or to retain the list in square brackets as the products listed went beyond what was needed for processed cheese. The PWG did not agree to this proposal and the list was maintained.

#### **3.2 Permitted ingredients**

19. The PWG considered a proposal to include lemon juice as another permitted ingredient in addition to vinegar, as well as a proposal to rather refer to “acidifying agents”, since vinegar and lemon juice were not the only acidifying agents in use.

20. The PWG did not agree to the proposal to refer to “acidifying agents” as such agents were better addressed in section 4 food additives. It was agreed to retain vinegar as a permitted ingredient and to add lemon juice to the list.

21. The PWG further agreed to delete the square brackets around “cultures of harmless bacteria and enzyme”.

22. The PWG considered a proposal to include spices and other seasonings in the list of permitted ingredients. There were diverse views on this matter. Some members of the PWG noted that according to section 4.5 of the *General Standard for Use of Dairy Terms* (CODEX STAN 206-1999), the use of such ingredients were not excluded and proposed a footnote to address this matter. Some other delegations questioned why spices might be addressed through a footnote, rather than in the main list of permitted ingredients. Questions were also raised on whether the inclusion of flavourings, such as spices, was in line with the agreed scope of the Standard. The delegations of Denmark and Austria pointed out that their inclusion could have implications for other parts of the Standard.

23. The PWG agreed to retain the footnote in square brackets noting that the issue of flavoured processed cheese might need to be addressed in another way, by extending the Standard to specifically address flavoured processed cheese, similar to the approach taken in the *Standard for Fermented Milk* (CODEX STAN 243-2003).

24. The PWG simplified the requirement for nutrients, as the proposed wording seemed to imply defining maximum and minimum levels which was not within the remit of CCMMP.

25. The PWG agreed that gelatine was not technologically justified for use in processed cheese and that modified starches would be described in the additive section.

#### **3.3 Composition**

26. The working group had extensive discussion on composition. While it was the consensus of the PWG that the main ingredient should be cheese and that the percentage of cheese that the final product should comprise should be on a dry matter basis, the PWG could not agree on the exact wording nor the percentage of cheese and therefore kept the proposal in square brackets. France did not agree with this position.

27. The working group agreed that there was a need to include provisions on the use of named-variety process cheeses and provide an understanding of the quantitative values for the cheese varieties of the ingoing material. It was noted that addressing this matter in this section would avoid inclusion of detailed information on composition in the labelling requirements for named-variety cheeses. The working group agreed to amend this section by inclusion of text to clarify that “cheese content of varieties referenced in the designation of name-variety processed cheese should constitute a certain percentage of the ingoing material”, but that this did not apply to strongly flavoured cheese varieties. There was however no agreement on the exact wording or on the quantitative values (51% and 75%) suggested by the PWG. Also the reference to ingoing cheese rather than ingoing material was discussed. The text was therefore maintained in square brackets for further consideration.

#### 4. Food additives

28. The PWG agreed that the food additives should be presented in a tabular form as was the case for other milk product standards. The PWG noted that it would not be possible to identify all individual food additives for use in processed cheese at this stage, but as a first step would identify those functional classes which were technological justified for use in processed cheese. The PWG also agreed that the table could differentiate between use of some functional classes on the basis of moisture and fat content, for example, with  $\leq 25\%$  dry matter (DM) and  $<30\%$  fat in dry matter (FDM) and these examples were retained in square brackets.

29. In view of this decision, the PWG agreed to delete the general wording in the working draft as well as section 4.1 stabilisers.

30. The Delegation of Denmark provided a draft, indicating the functional classes used in processed cheese.

31. Several points as below were discussed and decided:

- Positive list and negative list: The PWG agreed to retain the functional class of thickeners to clarify that there is no technological justification for their use. The approach of using a negative list was consistent with other milk product standards and this approach would provide clarification in particular for those food additives which had multi-functions. Noting the concerns remained on the approach and view that thickeners were used in some countries, the entire row was placed in square brackets.
- Emulsifying salts and emulsifiers: After recalling that emulsifying salts do not function directly as emulsifiers, the PWG agreed to retain emulsifying salts and emulsifiers as two separate functional classes.
- Colours: Some concerns were expressed on the use of colours. However, it was clarified that colours are used and were technologically justified not only in processed cheese, but in several other cheeses. The PWG decided to retain colours in the table.
- Stabilizers: As modified starches may be used as stabilizers in processed cheese in some countries, the PWG agreed to put "-" in square brackets under the table row of processed cheese. The PWG drafted a footnote allowing stabilizers to be used in processed cheese with a stringy and sliceable texture, but there was no consensus on this it was put in square brackets.

32. The USA disagreed with emulsifiers being allowed in processed cheese in the first column of the table and requested its reservation be noted.

#### 7. Labelling

##### 7.1.2

33. In conjunction with the composition section, the PWG discussed extensively the naming of named variety(es) processed cheese. In order to help to reach consensus, the delegation of Denmark provided a draft to replace the working draft text. The proposal provided for three options on naming named-variety processed cheese to allow flexibility taking into account the different ways in which such processed cheeses were named in different countries. There were many concerns on the implications of some of the options. Germany pointed out the items “composition” and “labelling” needed to be separated. As there was no consensus on the minimum cheese content (section 3.3), they considered that it is not possible to propose in section 7.1.2 (i) that in principle a figure of 100% is proposed, thus Germany requested that its reservation be noted. However as no alternative text was provided to the PWG, the Danish proposal was retained in square brackets for further discussion.

### **7.1.3**

34. The PWG agreed to place the figure 40%, the minimum fat content of dry matter, in square brackets as the appropriateness of this figure needed further discussion.

### **7.3 Declaration of cheese content**

35. The PWG agreed to add one conditional clause in the beginning in order to adjust the mandatory declaration requirements for cheese content, while deleting the elaboration regarding firmness. The PWG decided to place the provision in square brackets as further discussion would be needed.

### **8. Methods of analysis and sampling**

36. The PWG group agreed to remove all the texts in 8.1 and 8.2 as it was beyond the capability of the PWG to develop the technical detail required at this stage of development of the proposed draft Standard. The working group agreed that New Zealand and IDF would develop a proposal for this section.

### **CONCLUSION**

37. The PWG agreed to recommend that the proposed draft Standard (Appendix II) be circulated for comments at Step 3.

38. The PWG expressed its appreciation to IDF for its continuing support while acknowledging its past support over the many years this topic has been on the Codex agenda.

## Appendix II

**PROPOSED DRAFT GENERAL STANDARD FOR PROCESSED CHEESE  
(AT STEP 3)**

**1. SCOPE**

This Standard applies to processed cheese, including named-variety processed cheese, intended for direct consumption or further processing, in conformity with the description in Section 2 of this Standard.

This standard does not apply to products similar in nature and named as, for example, processed cheese preparations, processed cheese spreads and processed cheese food.

**2. DESCRIPTION**

**Processed cheeses<sup>2</sup>** are the milk products obtained

- (i) from cheese (CODEX STAN 283-1978), with or without the addition of other raw materials and permitted ingredients,
- (ii) by melting and emulsifying the mixture,
- (iii) with the aid of heat and emulsifying (or melting) salts in a well-mixed medium<sup>3</sup>, to produce a homogeneous, smooth and stable oil-in-water emulsion.

Named-variety(ies) processed cheeses are processed cheeses, as defined above, characterized by the use in their manufacture of one or more recognized varieties of cheese, and a reference to these in their designation.

**3. ESSENTIAL COMPOSITION AND QUALITY FACTORS****3.1 Raw materials**

- a. Cheese\*<sup>4</sup>;
- b. Milk products rich in fat (e.g. butter\*, butteroil\*, ghee\*, cream\*, cream powder\*);
- c. Milk and milk products other than the above (e.g. milk concentrates, buttermilk, milk powders\*, milk proteins, whey powders\*, lactose\*).

For further details, see relevant Codex standards.

The use of these raw materials shall be in conformance with Section 3.3.

**3.2 Permitted ingredients<sup>5</sup>**

- Sodium chloride, and potassium chloride as a salt substitute;
- Water;
- Safe and suitable processing aids;
- Vinegar;
- Lemon juice
- Cultures of harmless bacteria and enzymes;
- Nutrients where allowed in accordance with the *General Principles for the Addition of Essential Nutrients to Foods* (CAC/GL 9-1987).

**3.3 Composition**

[Cheese should be the single largest ingredient of the raw materials described in 3.1 and at least 51% of dry matter in the final product originates from cheese.]

[The cheese content of the variety(ies) referenced in the designation of named-variety(ies) processed cheeses should constitute at least [51/75\*] % (w/w) of the ingoing materials.

<sup>2</sup> [Varying the processing technology and composition will result in different textures from semi-solid to sliceable]

<sup>3</sup> [It is recognized that emulsifying salts do not function directly as emulsifiers.]

<sup>4</sup> The cheese must maintain intrinsic components

<sup>5</sup> [It is recognized that flavouring ingredients and/or other characterizing ingredients may be added in accordance with section 4.5 of the *General Standard for Use of Dairy Terms* (CODEX STAN 206-1999) ]

This does not apply to strongly flavoured cheese varieties (e.g. matured blue cheese or matured cheese from goat's milk). ]

#### 4. FOOD ADDITIVES

Only those functional classes indicated in the table below may be used for the product categories specified. Within each class, and where permitted according to the table, only those individual additives listed may be used and only within the limits specified. The list of additives will be developed.

<b>Functional Class</b>	<b>Processed Cheese</b>	<b>Processed Cheese with <math>\leq</math>[25%] DM and <math>&lt;</math>[30%] FDM</b>
Colours	X	X
Emulsifying Salts	X	X
Acidity Regulators	X	X
Preservatives	X	X
Emulsifiers	X	X
Stabilizers <sup>3</sup>	[-]	X <sup>1</sup>
Thickeners	-	-
Anticaking Agents	X <sup>2</sup>	-

1) Usage to be in compliance with the definition of milk product (2.2 of the *General Standard for Use of Dairy Terms* (CODEX STAN 206-1999))

2) For the surface treatment of sliced and shredded products, only

3) [In the case of processed cheese with a stringy and sliceable texture, stabilizers may be used]

#### 5. CONTAMINANTS

The products covered by this Standard shall comply with the Maximum Levels for contaminants that are specified for the products in the *General Standard for Contaminants and Toxins in Food and Feed* (CODEX STAN 193-1995).

The milk used in the manufacture of the products covered by this Standard should comply with the maximum levels for contaminants and toxins specified for milk by the *General Standard for Contaminants and Toxins in Food and Feed* (CODEX STAN 193-1995) and with the maximum residue limits for veterinary drug residues and pesticides established for milk by the Codex Alimentarius Commission.

#### 6. HYGIENE

It is recommended that the products covered by the provisions of this standard be prepared and handled in accordance with the appropriate sections of the *General Principles of Food Hygiene* (CAC/RCP 1-1969), the *Code of Hygienic Practice for Milk and Milk Products* (CAC/RCP 57-2004) and other relevant Codex texts such as Codes of Hygienic Practice and Codes of Practice. The products should comply with any microbiological criteria established in accordance with the *Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods* (CAC/GL 21-1997).

#### 7. LABELLING

In addition to the provisions of the *General Standard for the Labelling of Prepackaged Foods* (CODEX STAN 1-1985) and the *General Standard for the Use of Dairy Terms* (CODEX STAN 206-1999), the following specific provisions apply:

## **7.1 Name of the food**

### **7.1.1** The name of the food shall be "Process(ed) Cheese"

In addition, appropriate qualifiers describing the fat content may be used.

### **7.1.2** [The name of named variety(es) processed cheese shall be as follows:

- (i) Where the cheese variety name(s) referenced meets the compositional requirements for variety content of this Standard, the name shall be either Process(ed) \_\_\_\_\_ Cheese or Process(ed) Cheese with \_\_\_\_\_, the blank being filled with the variety name(s), as appropriate in the country of sale
- (ii) Where the cheese variety name(s) referenced constitute(s) all ingoing cheese material, the name is Process(ed) \_\_\_\_\_ Cheese, the blank being filled with the variety name(s).
- (iii) In other cases, the ingoing amount (w/w) of the cheese variety(ies) referenced shall be declared in the list of ingredients]

### **7.1.3** Use of nutrition claims such as reduced fat can be part of the designation and shall be in line with the *Guidelines for the Use of Nutrition and Health Claims* (CAC/GL 23-1997). For the purpose of nutrient comparative claims, the minimum fat content of [40%] fat in dry matter constitutes the reference.

## **7.2 Declaration of milk fat content**

The milk fat content shall be declared in a manner found acceptable in the country of sale to the final consumer, either (i) as a percentage by mass, (ii) as a percentage of fat in dry matter, or (iii) in grams per serving as quantified in the label provided that the number of servings is stated.

## **7.3 Declaration of cheese content**

[If the consumer would be misled by the omission, the ingoing percentage of cheese in the formulation (m/m) shall be declared.]

## **7.4 Declaration of milk protein content**

If the consumer would be misled by the omission, the milk protein content shall be declared in a manner acceptable in the country of sale to the final consumer, either as (i) a percentage by mass, or (ii) grams per serving as quantified in the label provided the number of servings is stated.

## **7.5 Labelling of non-retail containers**

Information required in Section 7 of this Standard and Sections 4.1 to 4.8 of the *General Standard for the Labelling of Prepackaged Foods* (CODEX STAN 1-1985), and, if necessary, storage instructions, shall be given either on the container or in accompanying documents, except that the name of the product, lot identification, and the name and the address of the manufacturer or packer shall appear on the container, and in the absence of such a container on the processed cheeses themselves. However, lot identification, and the name and address of the manufacturer or packer may be replaced by an identification mark, provided that such a mark is clearly identifiable with the accompanying documents.

## **8. METHODS OF ANALYSIS AND SAMPLING (TO BE DEVELOPED)**

### **8.1 Methods of analysis**

### **8.2 Methods of sampling**



## Appendix III

## LIST OF PARTICIPANTS

## CHAIRPERSON

**Steve Hathaway**

Director  
Science & Risk Assessment  
Ministry for Primary Industries  
New Zealand  
[steve.hathaway@mpi.govt.nz](mailto:steve.hathaway@mpi.govt.nz)

## VICE-CHAIRPERSON

**Daniela Escobar**

Senior Researcher  
Laboratorio Tecnológico Del Uruguay  
AV. Italia 6201  
Montevideo 11500  
Uruguay  
[descobar@latu.org.uy](mailto:descobar@latu.org.uy)

## MEMBER COUNTRIES

## ARGENTINA

**Mr Gaston Funes**

Counsellor of Agricultural Affairs  
Ministry of Agriculture  
Avenue Louise 225  
Brussels  
Argentina  
[funes@agricola-ue.org](mailto:funes@agricola-ue.org)

## AUSTRIA

**Mr Karl Schober**

Senior Officer  
Ministry of Agriculture, Forestry, Environment and  
Water Management  
Stubenring 12  
Vienna  
Austria  
[Karl.schober@bmlfuw.gv.at](mailto:Karl.schober@bmlfuw.gv.at)

## CANADA

**Wassim Khoury**

National Manager  
Canadian Food Inspection Agency  
1400 Merivale Road Tower 1  
Floor 6, Room 321  
Ottawa  
[Wassim.khoury@inspection.gc.ca](mailto:Wassim.khoury@inspection.gc.ca)

## COSTA RICA

**Viviana Tinoco**

Consellor  
Embassy of Costa Rica  
489 Avenue Louise 1050  
Brussels  
[vtinoco@rree.go.cr](mailto:vtinoco@rree.go.cr)

**Mr Alejandro Patino**

Commercial Attache  
Embassy of Costa Rica  
489 Avenue Louise 1050  
Brussels  
[alejandro.patino@comex.go.cr](mailto:alejandro.patino@comex.go.cr)

## CUBA

**Jose Fu Wong**

Senior Specialist  
Ministry of Food Industry  
Avenida 41 No 4455 entre 48 y 50. Playa  
Cuba  
[Jose.fu@minal.cu](mailto:Jose.fu@minal.cu)

## CZECH REPUBLIC

**Dr Dana Triskova**

Head of Animal Origin Food Unit  
Ministry of Agriculture  
Tesnov 17  
Prague  
Czech Republic  
[dana.triskova@mze.cz](mailto:dana.triskova@mze.cz)

## DENMARK

**Mr Claus Heggum**

Chief Consultant  
Danish Agriculture and Food Council  
Agro Food Park 13  
Aarhus N  
Denmark  
[chg@lf.dk](mailto:chg@lf.dk)

**Mrs Jytte Kjaergaard**

Head of Section  
Danish Veterinary and Food Administration  
Stationsparken 31  
Glostrup  
Denmark  
[jk@fvst.dk](mailto:jk@fvst.dk)

## EUROPEAN UNION

**Mr Jose Paixao**

European Commission  
Rue Froissart 101  
Brussels 1079  
Belgium  
[Manuel.DEL-POZO-RAMOS@ec.europa.eu](mailto:Manuel.DEL-POZO-RAMOS@ec.europa.eu)

**Bernadette Klink-Kachan**

EU Codex Contact Point  
European Commission  
Rue Froissart 101  
Brussels 1079  
[Bernadette.Klink-Kachan@ec.europa.eu](mailto:Bernadette.Klink-Kachan@ec.europa.eu)

**Eva Maria Zamora Escribano**

Deputy Head of Unit  
Directorate General for Health & Consumers  
European Commission  
Rue Froissart 101  
Brussels 1079  
[eva-maria.zamora-escribano@ec.europa.eu](mailto:eva-maria.zamora-escribano@ec.europa.eu)

**Barbara Moretti**

Codex Administrator  
European Commission  
Rue Froissart 101  
Brussels 1079  
[Barbara.moretti@ec.europa.eu](mailto:Barbara.moretti@ec.europa.eu)

**Risto Holma**

Codex Administrator  
European Commission  
Rue Froissart 101  
Brussels 1079  
[risto.holma@ec.europa.eu](mailto:risto.holma@ec.europa.eu)

**Manuel DEL POZO**

European Commission  
[Manuel.DEL-POZO-RAMOS@ec.europa.eu](mailto:Manuel.DEL-POZO-RAMOS@ec.europa.eu)

FRANCE

**Julien Petitnicolas**

National Expert  
Ministry of Economy  
59, Boulevard Vincent Auriol  
Paris Cedex 13  
Paris 75703  
France  
[Julien.PETITNICOLAS@dgccrf.finances.gouv.fr](mailto:Julien.PETITNICOLAS@dgccrf.finances.gouv.fr)

**Jennifer Huet**

Project Manager  
French Dairy Interbranch Organisation  
42, rue de Chateaudun  
Paris Cedex 9  
France  
[jhuet@cniel.com](mailto:jhuet@cniel.com)

GERMANY

**Christian Busse**

Assistant Head of Division  
Federal Ministry of Food and Agriculture  
Rochusstrabe 1  
Bonn  
Germany  
[432@bmel.bund.de](mailto:432@bmel.bund.de)

**Mr Konrad Hauber**

Manager  
Hochland SE  
Kemptener Strasse 17  
Heimenkirch 88178  
Germany  
[Konrad.hauber@hochland.com](mailto:Konrad.hauber@hochland.com)

**Dr Joerg Rieke**

Executive Director  
Assn of the German Dairy Industry  
Jaegerstr. 51  
Berlin 10117  
Germany  
[rieke@milchindustrie.de](mailto:rieke@milchindustrie.de)

HUNGARY

**Gabor Kelemen**

Senior Councillor  
Dept of Food Processing  
Ministry of Agriculture  
Hungary  
[gabor.kelemen@fm.gov.hu](mailto:gabor.kelemen@fm.gov.hu)

INDIA

**Sunil Kumar Bakshi**

Deputy General Manager  
National Dairy Development Board  
NDDDB Campus  
Anand 388001  
India  
[sbakshi@nddb.coop](mailto:sbakshi@nddb.coop)

IRAN

**Bahram Hosseinzadeh**

Quality Control Manager  
Kalleh Dairy Company  
Amol 4616818961  
Iran  
[bahram-hosseinzadeh@kalleh.com](mailto:bahram-hosseinzadeh@kalleh.com)

**Khosrow Barazandegan**

Deputy Officer of Standard Development  
Standard Research Institute  
PO Box 31745-139  
Karaj, Iran  
[khosrowbarazandegan@yahoo.com](mailto:khosrowbarazandegan@yahoo.com)

**Seyed Amir Mohammad Mortazavian Farsani**

University Professor  
Shahid Beheshti University of Medical Services  
PO Box 19395-4741  
Tehran  
Iran  
[mortazvn@sbmu.ac.ir](mailto:mortazvn@sbmu.ac.ir)

## ITALY

**Ciro Impagnatiello**

Ministry of Agriculture, Food & Forestry Policies  
Via XX Settembre, 20  
Rome  
Italy  
[c.impagnatiello@politicheagricole.it](mailto:c.impagnatiello@politicheagricole.it)

## JAPAN

**Osamu Suganuma**

Japanese National Committee of IDF  
Japan  
[idfjapan@rapid.ocn.ne.jp](mailto:idfjapan@rapid.ocn.ne.jp)

**Goro Hanagata**

Japanese National Committee of IDF  
Japan  
[idfjapan@rapid.ocn.ne.jp](mailto:idfjapan@rapid.ocn.ne.jp)

## NICARAGUA

**Patricia Campbell**

Conseillere Ambassade  
Nicaragua Embassy  
Nicaragua  
[embanic.patricia.campbell@skynet.be](mailto:embanic.patricia.campbell@skynet.be)

## PARAGUAY

**Luis Molinas**

Paraguay Embassy  
[empar.molinas@skynet.be](mailto:empar.molinas@skynet.be)

## POLAND

**Magdalena Kowalska**

Codex Contact Point  
Agricultural & Food Quality Inspection  
International Cooperation Department  
30, Wspolna Str.  
Warsaw 00-930  
Poland  
[kodeks@ijhars.gov.pl](mailto:kodeks@ijhars.gov.pl)

## SPAIN

**Maria Teresa Iglesias Cristobal**

Technical Head  
Spanish Agency for Consumer Affairs, Food  
Safety and Nutrition  
Avenida de Cantabria, 52  
Madrid 28042  
Spain  
[mteresa.iglesias@consumo-inc.es](mailto:mteresa.iglesias@consumo-inc.es)

## SWEDEN

**Carmina Ionescu**

Codex Coordinator  
National Food Agency  
Box 622  
Uppsala 75126  
Sweden  
[Carmina.ionescu@slv.se](mailto:Carmina.ionescu@slv.se)

## SWITZERLAND

**Christina Blumer**

Scientific Officer  
Federal Food Safety and Veterinary Office  
Schwarzenburgstrasse 155  
3003 Bern  
Switzerland  
[christina.blumer@blv.admin.ch](mailto:christina.blumer@blv.admin.ch)

## THAILAND

**Pravee Vijchulata**

Associate Professor  
Kasetsart University  
50 Ngam Wong Wan Rd  
Ladyao Chatuchak  
Bangkok 10900  
Thailand  
[agrpvv@ku.ac.th](mailto:agrpvv@ku.ac.th)

**Yupa Laojindapun**

Senior Standards Officer  
National Bureau of Agricultural Commodity and  
Food Standards  
50 Ngam Wong Wan Rd  
Ladyao Chatuchak  
Bangkok 10900  
Thailand  
[yupa@acfs.go.th](mailto:yupa@acfs.go.th)

## UNITED KINGDOM

**Miss Bobby Warwick**

Food Policy Adviser  
Dept of Environment, Food & Rural Affairs  
Area 3A, Nobel House,  
17 Smith Square  
London  
England  
[bobbie.warwick@defra.gsi.gov.uk](mailto:bobbie.warwick@defra.gsi.gov.uk)

## UNITED STATES OF AMERICA

**Diane Lewis**

Director  
Grading and Standards Division  
Dairy Programs  
US Dept of Agriculture  
1400 Independence Ave, SW  
Washington DC 20250  
United States  
[Diane.lewis@ams.usda.gov](mailto:Diane.lewis@ams.usda.gov)

**John Sheehan**

Director  
Division of Plant and Dairy Food Safety  
Center for Food Safety and Applied Nutrition  
U.S. Food and Drug Administration  
Harvey W. Wiley Federal Building  
5100 Paint Branch Parkway  
College Park, MD 20740  
United States  
[john.sheehan@fda.hhs.gov](mailto:john.sheehan@fda.hhs.gov)

**Kenneth Lowery**

International Issues Analyst  
US Codex Office  
1400 Independence Ave, SW  
Washington DC 20250  
United States  
[Kenneth.lowery@fsis.usda.gov](mailto:Kenneth.lowery@fsis.usda.gov)

## URUGUAY

**Monica Larrechart**

Jefe de Departamento Control Sanitario de Lácteos  
Ministerio de Agricultura y Pesca  
Constituyente 1476  
Montevideo 11100  
Uruguay  
[mlarrechart@mgap.gub.uy](mailto:mlarrechart@mgap.gub.uy)

**Valeria Csukasi**

Miniter  
Mission of Uruguay to the European Union  
Av F. D Roosevelt, 22  
1050 Brussels  
Belgium

**Federico Lage**

Third Secretary  
Ministry of Foreign Affairs  
Colonia 1206  
Montevideo 11100  
Uruguay  
[federico.lage@mrree.gub.uy](mailto:federico.lage@mrree.gub.uy)

## CODEX SECRETARIAT

**Ms Verna Carolissen**

Codex Secretariat  
Food Standards Officer  
FAO  
[Verna.Carolissen@fao.org](mailto:Verna.Carolissen@fao.org)

**Ms LingPing Zhang**

Codex Secretariat  
Food Standards Officer  
FAO  
[Lingping.Zhang@fao.org](mailto:Lingping.Zhang@fao.org)

## INTERNATIONAL NON-GOVERNMENT ORGANIZATIONS

**Mr Marc Vermeulen**

Director  
CEFIC  
4 Avenue E. Van Nieuwenhuyse  
Brussels 1160  
Belgium  
[mve@cefic.be](mailto:mve@cefic.be)

**Keith Johnston**

Principal Research Technologist  
Fonterra  
Private Bag 11029  
Palmerston North  
New Zealand  
[Keith.johnston@fonterra.com](mailto:Keith.johnston@fonterra.com)

**Rycken Laurence**

Nutrition Officer  
IDF  
Boulevard Auguste Reyers 70B  
Brussels  
Belgium  
[lrycken@fil-idf.org](mailto:lrycken@fil-idf.org)

## GENERAL GUIDANCE FOR THE PROVISION OF COMMENTS

In order to facilitate the compilation and prepare a more useful comments' document, Members and Observers, which are not yet doing so, are requested to provide their comments under the following headings:

- (i) General Comments
- (ii) Specific Comments

Specific comments should include a reference to the relevant section and/or paragraph of the document that the comments refer to.

When changes are proposed to specific paragraphs, Members and Observers are requested to provide their proposal for amendments accompanied by the related rationale. New texts should be presented in underlined/bold font and deletion in ~~strikerough font~~.

In order to facilitate the work of the Secretariats to compile comments, Members and Observers are requested to refrain from using colour font/shading as documents are printed in black and white and from using track change mode, which might be lost when comments are copied/pasted into a consolidated document.

In order to reduce the translation work and save paper, Members and Observers are requested not to reproduce the complete document but only those parts of the texts for which any change and/or amendments is proposed.