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 6: Draft General Standard for Processed Cheese

DEADLINE: 20 February 2016

BACKGROUND
1. The 38th Session of the Commission (CAC38), taking into account the recommendation of the CCEXEC70 and recognizing the progress made, agreed to adopt the proposed draft General Standard for Processed Cheese at Step 5, noting the reservations of Egypt and the EU.

2. The Commission requested New Zealand to convene a physical Working Group (pWG) and to consider hosting a physical meeting of CCMMP to look at the outstanding issues as outlined in the Circular Letter, CL 2015/15-MMP, issued in May 2015. The Commission confirmed the time frame for the completion of work, i.e. 2016, as outlined in the Project Document presented to CAC37.

3. The PWG met in December 2015 and prepared a draft standard for comments. The report of the PWG is attached at Appendix I.

REQUEST FOR COMMENTS
4. Comments at Step 6 are hereby requested on Draft General Standard for Processed Cheese (Appendix I).

5. Governments and international organizations wishing to provide comments should do so in writing preferably by e-mail to the above addresses before 20 February 2016. Comments should be in accordance with the general guidance for the provision of comments (see Annex to this Circular Letter).

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1. REP15/EXEC para. 19
2. REP15/CAC paras 83-84 and Appendix IV
Appendix I

DRAFT GENERAL STANDARD FOR PROCESSED CHEESE
(At Step 6)

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 applies only to products that are named according to this Standard. Products not complying with one or more parts of this Standard, in particular to the compositional provisions in Section 3, even if they are similar in nature to processed cheese, shall be named with different names. Such names (e.g. “processed cheese preparation”, “processed cheese spreads”, “processed cheese food” or “processed dairy product”) should not create an erroneous impression and be acceptable in the country of sale.

2. DESCRIPTION

Processed cheeses are the milk products obtained:

(i) from cheese as described in 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, to produce a homogeneous, smooth and stable oil-in-water emulsion.

Varying the processing technology and composition will result in different textures from stringy, spreadable, semi-solid to sliceable.

Named-variety(els) 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 name.

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.1 Raw materials

Category a. Cheese*;
Category b. Milk products rich in fat (e.g. butter*, butteroil*, ghee*, cream*, cream powder*);
Category 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 the provisions below.

3.1.1 Processed cheese with minimum cheese content of 75%

Cheese (category a) constitutes the only type of permitted raw material, except that milk products rich in fat (category b) may be added for fat content standardization of the final product.

3.1.2 Processed cheese with minimum cheese content of 51%

Cheese (category a) constitutes at least 51% of the total raw materials (categories a, b and c) on a dry matter basis in the final product.

3.1.3 Processed cheese designated with the qualifier “spreadable”

Cheese (category a) constitutes the largest among the three categories a, b and c.

However, for spreadable processed cheese with fat in dry matter (FDM) >45%, cheese constitutes at least 30% of the total raw materials (a, b and c) on a dry matter basis in the final product.

3 It is recognized that emulsifying salts do not function directly as emulsifiers.
3.1.4 Named Variety(ies) Process(ed) Cheese(s)

(i) The cheese variety(ies) referenced in the name constitutes at least 51% of the ingoing cheese(s) (category a) on a dry matter basis in the final product.

(ii) For strong-flavoured cheeses, such as matured blue-veined cheese, mould and bacterial surface-ripened cheese, or goat cheese(s), referred to in the name of process(ed) cheese a minimum percentage of the ingoing named-variety cheese(s) (category a) on a dry matter basis in the final product need not be specified.

3.2 Permitted ingredients

- Sodium chloride, and potassium chloride as a salt substitute;
- Water;
- 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

<table>
<thead>
<tr>
<th>Fat in dry matter (FDM)</th>
<th>Minimum dry matter</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Processed cheese</td>
<td>Processed cheese designated as &quot;spreadable&quot;</td>
</tr>
<tr>
<td></td>
<td>3.1.1</td>
<td>3.1.2</td>
</tr>
<tr>
<td>Equal to or above 50%</td>
<td>57%</td>
<td>50%</td>
</tr>
<tr>
<td>Equal to or above 30%</td>
<td>34%</td>
<td>34%</td>
</tr>
<tr>
<td>Below 30%</td>
<td>29%</td>
<td>29%</td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>Functional Class</th>
<th>Processed cheese (51%)</th>
<th>Processed cheese (75%)</th>
<th>Processed cheese designated as “spreadable”</th>
</tr>
</thead>
<tbody>
<tr>
<td>Colours</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Emulsifying Salts</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Acidity Regulators</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Preservatives</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Emulsifiers</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Stabilizers</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Thickeners</td>
<td>[X]</td>
<td>-</td>
<td>X</td>
</tr>
<tr>
<td>Anticaking Agents</td>
<td>X</td>
<td>X</td>
<td>-</td>
</tr>
</tbody>
</table>

(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 cheeses with stringy texture, stabilisers may be used.

X The use of additives belonging to the class is technologically justified.
- The use of additives belonging to the class is not technologically justified.

It is recognized that milk products, including processed cheese, may be mixed with flavouring ingredients and/or other characterizing ingredients, the resulting food being named in accordance with the General Standard for Use of Dairy Terms (CODEX STAN 206-1999) and the General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1-1985).
[The following table was not discussed by the PWG.]

<table>
<thead>
<tr>
<th>INS No.</th>
<th>Additive Name</th>
<th>Max. level</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>Colours</strong></td>
<td></td>
</tr>
<tr>
<td>101i,ii</td>
<td>Riboflavins</td>
<td>300 mg/kg</td>
</tr>
<tr>
<td>140</td>
<td>Chlorophyll</td>
<td>15 mg/kg</td>
</tr>
<tr>
<td>141i, ii</td>
<td>Chlorophylls, Copper Complexes</td>
<td>15 mg/kg</td>
</tr>
<tr>
<td>160a (i)</td>
<td>Beta-Carotene (Synthetic)</td>
<td>25 mg/kg</td>
</tr>
<tr>
<td>160a (ii)</td>
<td>Carotenes (Vegetable); Natural Extracts</td>
<td>600 mg/kg</td>
</tr>
<tr>
<td>160b</td>
<td>Annatto Extracts</td>
<td>15 mg/kg</td>
</tr>
<tr>
<td></td>
<td><strong>Emulsifying (or Melting) Salts</strong></td>
<td></td>
</tr>
<tr>
<td>325</td>
<td>Sodium Lactate</td>
<td>GMP</td>
</tr>
<tr>
<td>326</td>
<td>Potassium Lactate</td>
<td>GMP</td>
</tr>
<tr>
<td>327</td>
<td>Calcium Lactate</td>
<td>GMP</td>
</tr>
<tr>
<td></td>
<td><strong>Emulsifying (or Melting) Salts</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Acidity Regulators</strong></td>
<td></td>
</tr>
<tr>
<td>170i</td>
<td>Calcium Carbonate</td>
<td>GMP</td>
</tr>
<tr>
<td>260</td>
<td>Acetic Acid, Glacial</td>
<td>GMP</td>
</tr>
<tr>
<td>261</td>
<td>Potassium Acetate</td>
<td>GMP</td>
</tr>
<tr>
<td>262i</td>
<td>Sodium Acetate</td>
<td>GMP</td>
</tr>
<tr>
<td>263</td>
<td>Calcium Acetate</td>
<td>GMP</td>
</tr>
<tr>
<td>270</td>
<td>Lactic Acid</td>
<td>GMP</td>
</tr>
</tbody>
</table>

5 INS 160c(ii), Paprika extract, is included based on the decision at CCFA 2015 to request for comments/proposals on uses and use levels of paprika extracts for inclusion in Table 1 and 2 of the GSFA – the levels justified in processed cheese have yet to be confirmed – that shown in the table above is an indication only of such a level.

6 Subject to JECFA approval for processed cheese

7 Subject to JECFA approval for processed cheese
<table>
<thead>
<tr>
<th>INS No.</th>
<th>Additive Name</th>
<th>Max. level</th>
</tr>
</thead>
<tbody>
<tr>
<td>296</td>
<td>Malic Acid (DL-)</td>
<td>GMP</td>
</tr>
<tr>
<td>297</td>
<td>Fumaric Acid</td>
<td>GMP</td>
</tr>
<tr>
<td>330</td>
<td>Citric Acid</td>
<td>GMP</td>
</tr>
<tr>
<td>338</td>
<td>Orthophosphoric Acid</td>
<td>2,200 mg/kg</td>
</tr>
<tr>
<td>500</td>
<td>Sodium carbonate</td>
<td>GMP</td>
</tr>
<tr>
<td>575</td>
<td>Gluconic delta-Lactone</td>
<td>GMP</td>
</tr>
<tr>
<td></td>
<td><strong>Preservatives</strong></td>
<td></td>
</tr>
<tr>
<td>200</td>
<td>Sorbic Acid</td>
<td>2,000 mg/kg</td>
</tr>
<tr>
<td>201</td>
<td>Sodium Sorbate</td>
<td>GMP</td>
</tr>
<tr>
<td>202</td>
<td>Potassium Sorbate</td>
<td>GMP</td>
</tr>
<tr>
<td>203</td>
<td>Calcium Sorbate</td>
<td>GMP</td>
</tr>
<tr>
<td>280</td>
<td>Propionic Acid</td>
<td>GMP</td>
</tr>
<tr>
<td>281</td>
<td>Sodium Propionate</td>
<td>GMP</td>
</tr>
<tr>
<td>282</td>
<td>Calcium Propionate</td>
<td>GMP</td>
</tr>
<tr>
<td>283</td>
<td>Potassium Propionate</td>
<td>GMP</td>
</tr>
<tr>
<td>234</td>
<td>Nisin</td>
<td>12.5 mg/kg</td>
</tr>
<tr>
<td>301</td>
<td>Sodium Ascorbate</td>
<td>GMP</td>
</tr>
<tr>
<td>302</td>
<td>Calcium Ascorbate</td>
<td>GMP</td>
</tr>
<tr>
<td>1105</td>
<td>Lysozyme Hydrochloride</td>
<td>GMP</td>
</tr>
<tr>
<td></td>
<td><strong>Anticaking Agents</strong></td>
<td></td>
</tr>
<tr>
<td>460i</td>
<td>Microcrystalline Cellulose</td>
<td>GMP</td>
</tr>
<tr>
<td>460ii</td>
<td>Powdered Cellulose</td>
<td>GMP</td>
</tr>
<tr>
<td>500i</td>
<td>Sodium carbonate</td>
<td>GMP</td>
</tr>
<tr>
<td>551</td>
<td>Silicon Dioxide (Amorphous)</td>
<td></td>
</tr>
<tr>
<td>552</td>
<td>Calcium Silicate</td>
<td>10 g/kg</td>
</tr>
<tr>
<td>553i</td>
<td>Magnesium Silicate (Synthetic)</td>
<td></td>
</tr>
<tr>
<td>553iii</td>
<td>Talc</td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Emulsifiers</strong></td>
<td></td>
</tr>
<tr>
<td>322</td>
<td>Lecithins</td>
<td>GMP</td>
</tr>
<tr>
<td>471</td>
<td>Mono- and Diglycerides of fatty acids</td>
<td>GMP</td>
</tr>
<tr>
<td>472a</td>
<td>Acetic and Fatty Acid Esters of Glycerol</td>
<td>GMP</td>
</tr>
<tr>
<td>472b</td>
<td>Lactic and Fatty Acid Esters of Glycerol</td>
<td>GMP</td>
</tr>
<tr>
<td>472c</td>
<td>Citric and Fatty Acid Esters of Glycerol</td>
<td>GMP</td>
</tr>
<tr>
<td>472e</td>
<td>Diacetyl tartaric and Fatty Acid Esters of Glycerol</td>
<td>10,000 mg/kg</td>
</tr>
<tr>
<td>472f</td>
<td>Tartaric, Acetic and Fatty Acid Esters of Glycerol (Mixed)</td>
<td>GMP</td>
</tr>
<tr>
<td>473</td>
<td>Sucrose Esters of Fatty Acids</td>
<td>10,000 mg/kg</td>
</tr>
<tr>
<td>476</td>
<td>Polyglycerol Esters of Interesterified Ricinoleic Acid</td>
<td>5,000 mg/kg</td>
</tr>
<tr>
<td></td>
<td><strong>Stabilizers</strong></td>
<td></td>
</tr>
<tr>
<td>401</td>
<td>Sodium Alginate</td>
<td>GMP</td>
</tr>
<tr>
<td>402</td>
<td>Potassium Alginate</td>
<td>GMP</td>
</tr>
<tr>
<td>403</td>
<td>Ammonium Alginate</td>
<td>GMP</td>
</tr>
<tr>
<td>404</td>
<td>Calcium Alginate</td>
<td>GMP</td>
</tr>
<tr>
<td>406</td>
<td>Agar</td>
<td>GMP</td>
</tr>
<tr>
<td>407</td>
<td>Carrageenan</td>
<td>GMP</td>
</tr>
<tr>
<td>410</td>
<td>Carob Bean Gum</td>
<td>GMP</td>
</tr>
<tr>
<td>412</td>
<td>Guar Gum</td>
<td>GMP</td>
</tr>
<tr>
<td>413</td>
<td>Tragacanth Gum</td>
<td>GMP</td>
</tr>
<tr>
<td>414</td>
<td>Gum Arabic</td>
<td>GMP</td>
</tr>
<tr>
<td>415</td>
<td>Xanthan Gum</td>
<td>GMP</td>
</tr>
<tr>
<td>416</td>
<td>Karaya gum</td>
<td>GMP</td>
</tr>
<tr>
<td>417</td>
<td>Tara Gum</td>
<td>GMP</td>
</tr>
<tr>
<td>424</td>
<td>Curdlan</td>
<td>GMP</td>
</tr>
<tr>
<td>418</td>
<td>Gellan Gum</td>
<td>GMP</td>
</tr>
<tr>
<td>440</td>
<td>Pectins (Amidated and Non-amidated)</td>
<td>GMP</td>
</tr>
</tbody>
</table>

The table above lists various food additives and their maximum levels for use in food products, along with additional information such as preservation and anticaking properties. Each entry includes the additive name, the level of use, and any special notes about the level's application.
<table>
<thead>
<tr>
<th>INS No.</th>
<th>Additive Name</th>
<th>Max. level</th>
</tr>
</thead>
<tbody>
<tr>
<td>461</td>
<td>Methyl Cellulose</td>
<td>GMP</td>
</tr>
<tr>
<td>466</td>
<td>Sodium Carboxymethyl Cellulose</td>
<td>GMP</td>
</tr>
<tr>
<td>1400</td>
<td>Dextrins White and yellow, Roasted Starch</td>
<td>GMP</td>
</tr>
<tr>
<td>1401</td>
<td>Acid Treated Starch</td>
<td>GMP</td>
</tr>
<tr>
<td>1402</td>
<td>Alkaline Treated Starch</td>
<td>GMP</td>
</tr>
<tr>
<td>1403</td>
<td>Bleached Starch</td>
<td>GMP</td>
</tr>
<tr>
<td>1404</td>
<td>Oxidised Starch</td>
<td>GMP</td>
</tr>
<tr>
<td>1405</td>
<td>Enzyme Treated Starch</td>
<td>GMP</td>
</tr>
<tr>
<td>1410</td>
<td>Monostarch Phosphate</td>
<td>GMP</td>
</tr>
<tr>
<td>1412</td>
<td>Distarch Phosphate</td>
<td>GMP</td>
</tr>
<tr>
<td>1413</td>
<td>Phosphated Distarch Phosphate</td>
<td>GMP</td>
</tr>
<tr>
<td>1414</td>
<td>Acetylated Distarch Phosphate</td>
<td>GMP</td>
</tr>
<tr>
<td>1420</td>
<td>Starch Acetate esterified with Acetic Anhydride</td>
<td>GMP</td>
</tr>
<tr>
<td>1421</td>
<td>Starch Acetate esterified with Vinyl Acetate</td>
<td>GMP</td>
</tr>
<tr>
<td>1422</td>
<td>Acetylated Distarch Adipate</td>
<td>GMP</td>
</tr>
<tr>
<td>1440</td>
<td>Hydroxypropyl Starch</td>
<td>GMP</td>
</tr>
<tr>
<td>1442</td>
<td>Hydroxypropyl Distarch Phosphate</td>
<td>GMP</td>
</tr>
<tr>
<td>1450</td>
<td>Starch Sodium Octenyl Succinate</td>
<td>GMP</td>
</tr>
</tbody>
</table>

5. **PROCESSING AIDS**

The processing aids used in products covered by this standard shall comply with the *Guidelines on Substances used as Processing Aids* (CAC/GL 75-2010).

6. **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.

7. **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).

8. **LABELLING**

In addition to the provisions of the *General Standard for the Labelling of Prepackaged Foods* (CODEX STAN 1-1985), the *General Standard for the Use of Dairy Terms* (CODEX STAN 206-1999) and *Guidelines for the Use of Nutrition and Health Claims* (CAC/GL 23-1997), the following specific provisions apply:

8.1 **Name of the food**

8.1.1 The name of the food shall be “Process Cheese” or “Processed Cheese”.

The name of the food shall be qualified by the term “spreadable” when the relevant provisions of section 3.1.3 apply.

In the case of named variety(ies) processed cheeses covered by section 3.1.1 or 3.1.2, the name of the food shall be “Process(ed) ________”, or “________ Process(ed) Cheese”, the blank being filled with the variety name(s) as appropriate in accordance with Sections 2 and 3.1.4 of this Standard.
The name of the food shall be qualified by the term “stringy” if stabilizers are added to obtain a texture that exhibits stringy and chewy characteristics when the product is heated.

**8.2 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.

**8.3 Declaration of cheese content**

In the case of products covered by section 3.1.2 or 3.1.3, the ingoing percentage of cheese in the formulation (m/m) shall be declared.

In the case of products covered by section 3.1.4, the ingoing percentage of the referenced named variety(ies) cheese(s) in the formulation (m/m) shall be declared.

**8.4 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, either as (i) a percentage by mass, or (ii) grams per serving as quantified in the label provided the number of servings is stated.

**8.5 Labelling of non-retail containers**

Information required in Section 8 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 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.

**9. METHODS OF ANALYSIS AND SAMPLING**

*[The following tables were not discussed by the PWG.]*

**9.1 Methods of analysis**

<table>
<thead>
<tr>
<th>Provision</th>
<th>Method</th>
<th>Principle</th>
<th>Note</th>
<th>Type</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>[milk]Fat</td>
<td>Depending on lactose, starch and dextrin contents: ISO 1735</td>
<td>IDF 5 or ISO 8262-3</td>
<td>IDF 124-3 (higher carbohydrate contents &gt;5% m/m and/or extreme inhomogeneity).</td>
<td>Gravimetry (Schmid-Bondzynski-Ratzlaff)</td>
<td>Gravimetry (Weibull-Berntrop)</td>
</tr>
<tr>
<td>[milk]Protein</td>
<td>ISO 8968-1</td>
<td>IDF 20-1</td>
<td>Titrimertry (Kjeldahl)</td>
<td>This method measures total protein and does not specifically measure milk protein if nitrogen of other origin is present.</td>
<td>I</td>
</tr>
<tr>
<td>Provision</td>
<td>Method</td>
<td>Principle</td>
<td>Note</td>
<td>Type</td>
<td>Comment</td>
</tr>
<tr>
<td>---------------------------</td>
<td>-----------------------------------------</td>
<td>---------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------</td>
<td>------</td>
<td>-------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Dry matter</td>
<td>ISO 5534</td>
<td>IDF 4 + Corr 1:2013</td>
<td>Gravimetry, drying at 102°C</td>
<td>I</td>
<td>Method is validated for processed cheese.</td>
</tr>
<tr>
<td>[Milk]fat in dry matter</td>
<td>ISO 1735</td>
<td>IDF 5 or ISO 8262-3</td>
<td>IDF 124-3 and dry matter is measured by ISO 5534</td>
<td>IDF 4, FDM may be obtained by calculation</td>
<td>I</td>
</tr>
<tr>
<td>Sodium chloride</td>
<td>ISO 5943</td>
<td>IDF 88</td>
<td>Potentiometry (determination of chloride, expressed as sodium chloride)</td>
<td>II</td>
<td>The method is applicable to processed cheese containing more than 0.2 % (mass fraction) of chloride ion.</td>
</tr>
<tr>
<td>Added phosphate</td>
<td>ISO/TS 18083</td>
<td>IDF RM 51</td>
<td>Calculation from phosphorus content and nitrogen content</td>
<td>IV</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>The cheese varieties Cheddar, Cheshire, Edam, Emmental, Gouda, Gruyerzer (Gruyère), Hergards, Tilsiter, Samso and Svecia generally have P/N ratios within the limits stated in the scope. A number of cheese varieties e.g. white mould cheeses, cheeses of the Munster type, most goat cheeses and different non-matured and matured cream cheeses may have lower P/N ratios. Limited amounts of milk or whey powder and ham can be present as optional ingredients without significantly changing the P/N ratio. In other cases, the applicability of the approach should be critically evaluated before use.</td>
</tr>
<tr>
<td>Total phosphorus</td>
<td>ISO 2962</td>
<td>IDF 33</td>
<td>Spectrophotometry</td>
<td>II</td>
<td>Processed cheese is within the scope of the method. r and R values are listed with the method. Collaborative study results are not provided or referenced.</td>
</tr>
<tr>
<td>Citrate emulsifying agents and pH-controlling agents</td>
<td>ISO 12082</td>
<td>IDF 52</td>
<td>Calculation based on citric acid content and lactose content</td>
<td>IV</td>
<td>Processed cheese is within the scope of the method. Available validation data are not fulfilling ISO 5725-2, therefore TS/RM.</td>
</tr>
<tr>
<td>Citric acid</td>
<td>ISO/TS 2963</td>
<td>IDF/RM 34</td>
<td>Enzymatic determination</td>
<td>IV</td>
<td></td>
</tr>
<tr>
<td>Lactose</td>
<td>ISO 5765-1/2</td>
<td>IDF 79-1/2</td>
<td>Lactose - Enzymatic method: Part 1 – Glucose moiety or Part 2 – Galactose moiety</td>
<td>II</td>
<td></td>
</tr>
</tbody>
</table>

### 9.2 Methods of sampling

<table>
<thead>
<tr>
<th>PROVISION</th>
<th>METHOD</th>
<th>NOTE</th>
</tr>
</thead>
</table>
| Sampling  | ISO 707|IDF 50| General instructions for obtaining a
| | sample from a bulk |
REPORT OF THE CCMMP PHYSICAL WORKING GROUP ON THE GENERAL STANDARD FOR PROCESSED CHEESE

1. The Physical Working Group (PWG) met in Montevideo, Uruguay, from 8 – 10 December 2015 and was chaired by Dr Steve Hathaway of New Zealand. 19 member countries, one member organisation and 2 observer organisations attended the PWG. The participants’ list is attached in the Annex.

2. The meeting was opened by Mr Martin Alvez, Counsellor, Ministry of Foreign Affairs, Uruguay, and was also addressed by Mr Enzo Benech, Vice-Minister for Agriculture, Livestock and Fisheries, Uruguay.

3. The PWG discussions were guided by the decision of the CAC38 and comments submitted in response to CL2015/22-MMP.

4. The PWG considered the draft as presented in CL2015/22-MMP and the proposals as prepared by the New Zealand secretariat (working paper on the draft general standard for processed cheese) and took into account all written comments submitted.

5. The report highlights only those sections of the draft standard that were amended.

Scope

6. The PWG amended the scope to clarify those products that are covered by the standard as opposed to those not covered.

Permitted ingredients

7. The PWG:
   - did not see the need to list any flavouring foods, such as spices, in the list of ingredients as the draft Standard was in principle for plain processed cheese and the use of spices and flavouring substances were, in any event, allowed for use as per the provisions of the General Standard for the Use of Dairy Terms and therefore agreed to insert a footnote to indicate this. This was in line with a similar approach taken for other milk product standards;
   - deleted the reference to safe and suitable processing aids on the basis that the use of these substances was covered by Guidelines on Substances used as Processing Aids (CAC/GL 75-2010) and made a reference to this under the heading “processing aids”.

Compositional issues of processed cheese

8. The PWG discussed two specific issues:
   - whether cheese constituted the single largest ingredient out of the three raw material categories listed in section 3.1 and what this would mean in terms of the cheese content of the final product;
   - the minimum cheese content level.

9. The PWG also considered inclusion of a table to differentiate and specify the dry matter contents in relation to fat in dry matter levels for processed cheese and spreadable processed cheese.

10. There was agreement that cheese should constitute the single largest ingredient among the 3 raw material categories (i.e. >33%), but delegations had divergent views on a numerical minimum level of cheese content. Proposals were put forward for 75% and 51%.

11. To make provision for these proposals (i.e. 75% and 51%), the PWG agreed to group processed cheese according to the raw material inputs and to place these groups in the section on raw materials (section 3.1) to capture the relationship between raw materials and the product composition. It was also agreed to incorporate further groups for processed cheeses designated as spreadable, and named-variety processed cheeses, in this section.

12. The PWG developed a co-dependence between raw material and composition provisions and the labelling section (declaration of cheese content and product naming).

Processed cheese designated with the qualifier “spreadable”

13. There was discussion on an appropriate minimum cheese content for this group of processed cheeses.
14. Divergent views were expressed on the amount of cheese contained in these products with fat in dry matter content above 45%, with opinions ranging from those favouring 25% to 33%. The Chairperson reminded the PWG to keep in mind the mandate of Codex to facilitate international food trade while at the same time ensuring consumers are not misled.

15. France, as one of the members in favour of the 25% minimum cheese content, noted that many of these products within the scope of the draft Standard were already traded in the international market and there was need to recognize such products in the Standard. Nevertheless discussions on this category reflected the concerns with the low level of cheese in such products and the appropriateness of labelling these products as cheese. Products containing such low levels of cheese could be misleading to consumers who may be expecting a higher level of cheese content. Nonetheless there was recognition that it was considered necessary to address consumer concerns through specific labelling provisions.

16. Based on discussions, the PWG established a compromise level of 30%.

17. The Delegation of France did not support this decision.

Composition

18. In light of the discussion on raw material issues above, the PWG agreed to insert a table on compositional specifications in line with similar provisions under this section in other dairy standards.

Food additives

19. Much of the discussion focused on the technological justification for use of stabilizers and thickeners for the two groups of processed cheese (51% and 75%). There was divergent opinion on the need for these functional classes.

Stabilizers

20. There was support for the use of stabilizers in all three categories of processed cheese, recognizing its use in particular for stringy-textured processed cheese; UHT processed cheeses; and for spreadable processed cheese. The technological justification for this decision was that stabilizers bind cheese and other dairy ingredients and avoid water exudation. The Delegation of the United States of America was of the opinion that stabilizers should not be used when not technologically justified.

Thickeners

21. Members were divided on the use of thickeners for processed cheese 51% and it was retained in square brackets. It was agreed to exclude this functional class for use in processed cheese 75%; and for processed cheese designated as spreadable on the basis of a footnote recognizing that the usage should be in compliance with the definition of milk product (2.2 of the General Standard for the Use of Dairy Terms). The latter was based on the concern that usage of thickeners had the potential to displace dairy-based ingredients in the final product.

22. The Delegation of the European Union expressed the view that thickeners should be allowed in all categories of processed cheese including processed cheese 75% and did not support the decision taken by the PWG.

23. The PWG agreed that when comments were sought on the draft Standard, technological justification should be provided for the use of stabilizers and thickeners.

24. The PWG did not discuss the list of food additives that still needed to be developed and agreed that a proposal prepared by IDF would be included in the draft Standard and circulated for comments.

Labelling

25. The meeting agreed to relocate the reference to Guidelines for the Use of Nutrition and Health Claims (CAC/GL 23-1997) in the introductory paragraph to section 7.

26. In light of the elaboration of the different groups of processed cheeses described in section 3.1, the PWG took the following decisions:

27. Section 7.1 - provided clarity in naming of products covered under categories of processed cheeses described in sections 3.1.2, 3.1.3 and 3.1.4 (products described as spreadable, stringy and named-variety processed cheeses). The PWG recognized that further drafting was needed to clarify the naming of spreadable processed cheeses to reflect the three triggers for the mandatory labelling of spreadable processed cheeses (sections 3.1.3, 3.3 and 4).

28. The PWG agreed to a provision for mandatory quantitative declaration of the amount of the cheese variety referenced in the name.
29. For strongly flavoured cheeses, the PWG did not see the need to specify any minimum percentage of the ingoing variety, but supported a mandatory declaration of the percentage of the named variety cheese.

30. The PWG agreed to mandatory declaration of the cheese content (section 7.3) for products falling within the product groups covered under sections 3.1.2, 3.1.3 and 3.1.4.

**Methods of Analysis and Sampling**

31. The PWG did not discuss this section and agreed that a proposal prepared by IDF would be included in the Standard and circulated for comments.

**Conclusion**

32. The PWG expressed its gratitude to the IDF for their technical support and contribution to the meeting.

33. The Chair of the meeting also thanked all the participants for their contribution to the discussions.

34. The Chair also expressed his appreciation to the Government of Uruguay for their support and collaboration in co-hosting this meeting.

**Next steps**

35. The PWG was advised that the report of the meeting and the revised draft General Standard for Processed Cheese (see Appendix 2) would be circulated for comment to all members and observers of the Commission before the end of 2015.

36. Based on comments received, New Zealand, as host government of CCMMP, will prepare a further report and recommendations for consideration and comments by members and observers by the end of March 2016.

37. New Zealand will prepare a final report reflecting all views based on the comments received, and submit through the Codex Secretariat to the 39th Session of the Commission (July 2016).
LIST OF PARTICIPANTS
LISTE DES PARTICIPANTS
LISTA DE PARTICIPANTES

CHAIRPERSON – PRÉSIDENT – PRESIDENTE

Steve Hathaway
Director
Food Science & Risk Assessment
Ministry for Primary Industries
25 The Terrace
Wellington
New Zealand
Steve.hathaway@mpi.govt.nz

MEMBERS – MEMBRES – MIEMBROS

AUSTRIA – AUTRICHE
Mr Karl Schober
Senior Officer
Ministry of Agriculture, Forestry, Environment and Water Management
Stubenring 12
Vienna
Austria
Karl.schober@bmlfuw.gv.at

BRAZIL - BRÉSIL - BRASIL
Mrs Milene Cé
Official Veterinarian
Ministry of Agriculture
AV Loureiro Da Silva
515/706 – Centro
Porto Alegre/RS 90010-420
Brazil
Milene.ce@agricultura.gov.br

Mr Sergio Bajaluk
Official Veterinarian
Ministry of Agriculture
Rua Dos Atiradores, 71
Pomerode-SC 89107-000
Brazil
Sergio.bajaluk@agricultura.gov.br

Mrs Cristina Mosquim
Technical of Regulatory Affairs
Viva Lacteos
Setor hoteleiro Sul
Qd.6, Conj.A,B.I.C.Salas 224/225
Complexo empresarial Brasil 21
Brasilia DF-CEP 70.316-109
Brazil
cristina@vivalacteos.org.br

CANADA - CANADÁ
Mrs Kathy Twardek
National Manager
Canadian Food Inspection Agency
1400 Merivale Road Tower 1
Floor 6, Room 321
Ottawa
kathy.twardek@inspection.gc.ca

Miss Jennifer Miner
A/National Manager
Canadian Food Inspection Agency
1400 Merivale Road Tower 1
Floor 6, Room 321
Ottawa
Jennifer.miner@inspection.gc.ca

CHILE – CHILI
Mr Diego Varela
Codex Focal Point
ACHIPIA
Nueva York 17 piso 4
Santiago
Chile
diego.varela@achipia.gob.cl

Mr Víctor Esnaola
Sectorialista lechero
ODEPA
Teatinos 40 piso 8
Santiago
Chile
vesnaola@odepa.gob.cl

COLOMBIA - COLOMBIE
Mr Alvaro Alejandro Gómez
Consejero
Embajada de Colombia
Dr. José Scoseria 2815
Montevideo
Uruguay
alvaro.gomez@cancilleria.gov.co

COSTA RICA
Arnoldo Herrera
Embajador
Embajador de Costa Rica Uruguay
Roque Graseras 740
Montevideo 11300
Uruguay
embarica@adinet.com.uy

DENMARK - DANEMARK – DINAMARCA
Mr Claus Heggum
Technical Adviser
Danish Veterinary and Food Administration
Agro Food Park 13
Aarhus N
Denmark
chg@lf.dk
NETHERLANDS - PAYS-BAS - PAÍSES BAJOS
Mr Bart Vrolijk
Agricultural Counselor
Netherlands Embassy
Olga Colsetini 831
Buenos Aires C1107CDC
Argentina
BUE-LNV@MINBUZA.NL

PARAGUAY
Mr Raul Cano Ricciardi
Minister
Paraguay Embassy in Uruguay
Bulevar Artigas 434 esq. Luis de la Torre
Uruguayembaparsec@mre.gov.py
Montevideo
Uruguay

SWITZERLAND - SUISSE – SUIZA
Mr Mark Stauber
Head Food Hygiene
Federal Food Safety and Veterinary Office
Schwarzenburgstrasse 155
3003 Bern
Switzerland
Mark.stauber@blv.admin.ch

UNITED KINGDOM – ROYAUME-UNI – REINO UNIDO
Mrs Bobbie Warwick
Food Policy Advisor
DEFRA
Area 1A, DEFRA
Nobel House
17 Smith Square
London SW15 2BN
England
Bobbie.warwick@defra.gsi.gov.uk

UNITED STATES OF AMERICA
ÉTATS-UNIS D’AMÉRIQUE
ESTADOS UNIDOS DE AMÉRICA
Mr Chris Thompson
Acting Branch Chief
Dairy Standardization Branch
US Department of Agriculture
1400 Independence Ave, SW
Washington DC 20250
Christopher.d.Thompson@ams.usda.gov

Mr John Allan
Vice President
Regulatory Affairs & International Standards
International Dairy Foods Association
1250 H St. NW, Suite 900
Washington DC 20005
jallen@idfa.org

Mr Kenneth Lowery
International Issues Analyst
US Codex Office
1400 Independence Ave, SW
Washington DC 20250
Kenneth.lowery@fsis.usda.gov

Mr Robert Byrne
Director
Industry & Regulatory Affairs
Schreiber Foods Inc
400 N Washington Street
Green Bay WI 54301
Rob.byrne@schreiberfoods.com

URUGUAY
Mr Federico Lage
Third Secretary
Ministry of Foreign Affairs
Colonial 1206
Montevideo 11100
Uruguay
federico.iage@mrree.gub.uy

Mrs Maria Cecilia Da Silva
Veterinary Advisory
Dairy Products Health Control Department
Ministry of Livestock, Agriculture and Fisheries
Route 8 KM 17
Montevideo
Uruguay
mdasilva@mgap.gub.uy

Mrs Daniela Escobar Gianni
Senior Researcher
Laboratorio Tecnológico del Uruguay
Av. Italia 6201
Montevideo 11500
Uruguay
descobar@latu.org.uy

Mrs Karina Salvo
Laboratorio Tecnológico del Uruguay
Av. Italia 6201
Montevideo 11500
Uruguay
ksalvo@latu.org.uy

Mr Aldo Ibarra
Asesor Privado Cámara de Industria Láctea
Sta Mónica 2261
Montevideo 11500
Uruguay
alibarra04@gmail.com

Dr Oscar Gonzalez
Asesor Privado Cámara de Industria Láctea
Magallanes 1871
Montevideo 11500
Uruguay
ogonzalez@conaprole.com.uy

INTERNATIONAL NON-GOVERNMENTAL ORGANIZATIONS - ORGANISATIONS NON-GOUVERNEMENTALES INTERNATIONALES - ORGANIZACIONES NO GUBERNAMENTALES INTERNACIONALES

INTERNATIONAL DAIRY FEDERATION
Keith Johnston
Principal Research Technologist
 Fonterra
Private Bag 11029
Palmerston North
New Zealand
Keith.johnston@fonterra.com
Aurélie Dubois-Lozier  
Technical Manager  
International Dairy Federation  
Boulevard Auguste Reyers 70B  
Brussels 1030  
Belgium  
adubois@fil-idf.org

INTER AMERICAN INSTITUTE FOR COOPERATION IN AGRICULTURE
Mrs Maria Alejandra Bentancur Pena  
Project Management Specialist  
Inter-American Institute for Cooperation on Agriculture  
Luis P. Piera 1992  
Edificio MERCOSUR  
Montevideo 11200  
Uruguay  
Alejandra.bentancur@iica.int

CODEX SECRETARIAT - SECRÉTARIAT DU CODEX - SECRETARÍA DEL CODEX
Ms Verna Carolissen  
Codex Secretariat  
Food Standards Officer  
FAO  
Verna.Carolissen@fao.org

CCMMP SECRETARIAT – SECRÉTARIAT DU CCMMP - SECRETARÍA DEL CCMMP
Raj Rajasekar  
Ministry for Primary Industries  
25 The Terrace  
Wellington 6140  
New Zealand  
raj.rajasekar@mpi.govt.nz
ANNEX

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 strikethrough 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.