

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
the United Nations



World Health
Organization

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Agenda Item 5(b)

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CODEX ALIMENTARIUS COMMISSION

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COMMENTS ON PROPOSED DRAFT STANDARDS AND RELATED TEXTS SUBMITTED TO THE COMMISSION FOR ADOPTION AT STEP 5

(Comments submitted by 18 June 2015)

KENYA

We have no objection with adoption of these standards at step 5 by the Commission .

Committee on Fats and Oils
Comité sur les graisses et les huiles
Comité sobre Grasas y Aceites

Standard for Fish Oils (Proposed Draft) (para. 47, Appendix III)

Comments of Costa Rica

COSTA RICA

Costa Rica agradece y apoya la gestión realizada sobre el Anteproyecto de Norma para aceites de pescado (párr. 47 y Apéndice III), sin embargo por el momento no emite comentarios.

Committee on Contaminants in Foods
Comité sur les contaminants dans les aliments
Comité sobre Contaminantes en los Alimentos

Maximum level for inorganic arsenic in husked rice (Proposed Draft) (para. 69, Appendix V)

Comments of Canada, Costa Rica and European Union

CANADA

General support.

COSTA RICA

Costa Rica apoya los niveles propuestos en el “Anteproyecto de nivel máximo para el arsénico inorgánico en el arroz descascarillado (párr. 69, Apéndice V)”.

EUROPEAN UNION

The EU would like to reiterate its reservation already introduced at CCCF on the proposed draft ML of 0.35 mg/kg for inorganic arsenic in husked rice, as the ML is considered to be too high, based on representative sampling performed within the European Union on rice from global origin. In view of these data, the proposed ML of 0.35 mg/kg for husked rice will not lead to a significant reduction of consumer exposure.

Code of Practice for the Prevention and Reduction of Mycotoxin Contamination in Cereals (CAC/RCP 51-2003) (general provisions applicable to mycotoxins in cereals) (Proposed Draft Revision) (para. 104, Appendix VII)

Comments of Canada and Costa Rica

CANADA

General support.), Canada fully supports adoption of the main text of the *Code of Practice for the Prevention and Reduction of Mycotoxin Contamination in Cereals*, i.e., the general provisions that are applicable to mycotoxins in cereals. We also support returning the annexes to step 2/3 for further consideration by the eWG, to be chaired by Brazil with the support of Canada and the United States of America, as co-chairs.

COSTA RICA

Costa Rica apoya el avance en el Trámite 5 (párr. 104, Apéndice VII). Del “*Anteproyecto de revisión del Código de prácticas para prevenir y reducir la contaminación de los cereales por micotoxinas (CAC/RCP 51-2003) (disposiciones generales aplicables a las micotoxinas en los cereales) en el Trámite 5 (párr. 104, Apéndice VII)*”.

**Committee on Milk and Milk Products
Comité sur le lait et les produits laitiers
Comité sobre la Leche y los Productos Lácteos**

General Standard for Processed Cheese (Proposed Draft) (CL 2015/15-MMP, Annex 1 and Annex 2, para.13)

Comments of Argentina, Canada, European Union, Japan, Morocco, Saudi Arabia and United States of America

ARGENTINA

Argentina está de acuerdo con los lineamientos generales del proyecto de norma sobre el queso procesado.

Con respecto al contenido de queso de una variedad referida en la denominación de venta del queso fundido se sugiere especificar que el queso de esa variedad, utilizado como materia prima, sea el componente mayoritario de la totalidad de los quesos utilizados en su elaboración (punto 7.1.2).

En lo referente a los temas propuestos para una posterior consideración se apoya la propuesta de desarrollar la lista de aditivos y de métodos de análisis con la asistencia de la FIL. Se está de acuerdo con la denominación “*queso procesado*” como alternativa de “*queso fundido*”, con la salvedad de que en la versión en inglés debería decir “procesado” en lugar de “processado” como figura en el proyecto. Se solicita además que no se reemplace el término español “feteable” (punto 2. DESCRIPCIÓN) ya que en Argentina es un término que se utiliza frecuentemente.

Argentina apoya la adopción de la norma en paso 5 y la continuación del trabajo en el ámbito del grupo electrónico correspondiente.

CANADA

GENERAL COMMENTS

It is noteworthy that the previous Draft Standard at Step 3 contained myriad points of contention which relate, in part, to composition and food additives.

Due to their nature and significance to an international processed cheese standard as well as the polarized views amongst countries who submitted comments on such issues, Canada is of the view that further discussions and considerations are required before the document is ready to move to Step 5. This is especially important on issues such as composition, where consensus was not yet within reach based on the comments submitted by member countries.

Canada maintains its previously mentioned views that in the absence of known impediments to international trade and market access, an international processed cheese standard is not warranted at the present time. However, should this work continue, Canada recommends that the proposed draft be brought back to Step 3 for further discussion with member countries to ensure that contentious issues, such as those related to composition, are adequately addressed and consensus is reached before proceeding further. If consensus cannot be reached, Canada recommends discontinuation of this work.

SPECIFIC COMMENTS

3.3 COMPOSITION

Canada supports cheese being the single largest ingredient of the raw materials.

Considering that the Draft Standard permits the use of milk and milk products such as milk and whey powders, milk proteins, etc., Canada suggests that a percent amount of cheese be indicated. This should help preclude situations where cheese may well be the single largest ingredient of the raw materials but winds up being in low amounts in the finished product.

Canada noted that the proposed percentages in Section 3.3 of the Draft Standard in CL 2015/2-MMP were removed from this Draft Standard.

4. FOOD ADDITIVES

Canada supports the use of stabilizers and thickeners in processed cheese when functionally necessary provided their use does not exceed a specified limit e.g., 0.5 %.

EUROPEAN UNION

The European Union and its Member States (EUMS) are of the view that the text is not ready for adoption at Step 5 due to the fact that a number of technical issues in the proposed draft standard still need further consideration and clarification.

JAPAN

General Comments

Japan agrees with the Proposed Draft General Standard for Processed Cheeses at Step 5.

Specific Comments

Regarding the Section 3.3(Composition), if numeric minimum cheese content would be included in the standard, Japan prefers the text in the first brackets in CL 2015/2-MMP:

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.

(Rational)

As the name of a product should provide proper information of the product not to mislead consumers, the product should be composed of at least 51% cheese in dry matter basis of final product as the single largest ingredient

MOROCCO

Le Maroc voudrait soumettre les observations suivantes

(i) Observations générales

Le Maroc soutient l'idée à ce que la norme soit strictement réservée aux fromages fondus. Les autres types de produits à base de fromage fondu comme « préparations à base de fromage fondu », « pâte à tartiner à base de fromage fondu » et « aliment à base de fromage fondu » méritent d'être traités dans des normes spécifiques.

(i) Observations Spécifiques

Paragraphe : 2. Description :

Il serait souhaitable que le dernier paragraphe soit complété de manière précise par le pourcentage de fromage dominant par rapport aux autres fromages composants le produit ;

Justificatif :

Ceci pour éviter toute fraude possible relative au coût du produit.

Paragraphe : 3.3/Composition :

La notion « plus important » du paragraphe est large et porte confusion. Il est suggéré que ça soit remplacé par un taux précis. Ainsi que la teneur de la matière grasse proportionnelle à la matière sèche devrait être fixée clairement.

Justificatif :

- *le consommateur a le droit de savoir quel est le taux de fromage prédominant ;*
- *le consommateur doit être informé sur le taux de matière grasse ;*
- *plusieurs réglementations exigent que les mentions de l'étiquetage soient précises.*

SAUDI ARABIA

Specific Comments

3.2 Permitted ingredients

- Sodium chloride, and potassium chloride as a salt substitute;
- Water;
- Safe and suitable processing aids; **(listed in paragraph 4).**

4. FOOD ADDITIVES***Functional Class*****Natural Colours**

Only natural colors are permitted in cheese.

6. HYGIENE

It is recommended that the products covered by the provisions of this standard **shall** 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.

UNITED STATES OF AMERICAGeneral comments:

Presently, it is unclear what rationale was used for revising the standard, nor is it clear that there was consensus for those revisions among those who submitted comments. The U.S. is concerned with the lack of agreement on numerous longstanding and contentious issues, which we believe indicates that those issues require further discussion and agreement - especially with respect to the composition of the product and minimum cheese content as a percentage -by the entire physical working group.

The U.S. unequivocally maintains that a processed cheese standard that does not include minimum cheese content is not a standard at all. Given the very divergent views on composition expressed in comments submitted on the draft standard CL 2015/2 — MMP, it would appear that processed cheese is a product which is not capable of being standardized internationally.

We strongly urge that work be discontinued on this standard, but if such will not be the case, we would advocate that this standard go back to Step 3 for further discussion by the delegations, which would benefit from full industry representation on their delegations, regarding the outstanding points of contention until consensus is achieved or until it is agreed that the work be discontinued.

Specific Comments:

The revised document made the following significant changes:

3.3 Composition: Nearly half the country comments favored numerical composition requirements ➤ yet proposed figures were deleted.

4.0 Food Additives: The U.S. does not support the use of thickeners and stabilizers as they are not technologically justified when making a bona fide processed cheese, yet they are now permitted in the standard.

7.1.2. Name of the food: Name of named variety(ies) is not associated with any compositional requirements; rather it defaults to language in country of sale.