

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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**AGENDA ITEM NO. 6
ADD.1**

CX/FL 01/08-

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

**CODEX COMMITTEE ON FOOD LABELLING
TWENTY-NINTH SESSION
OTTAWA, CANADA, 1 - 4 MAY 2001**

**DRAFT AMENDMENT TO THE GENERAL STANDARD FOR THE
LABELLING OF PREPACKAGED FOODS
(CLASS NAMES)
(ALINORM 01/22, APPENDIX VI)**

GOVERNMENT COMMENTS AT STEP 6

COMMENTS FROM:

**UNITED KINGDOM
EUROPEAN COMMUNITY**

**DRAFT AMENDMENT TO THE GENERAL STANDARD FOR THE
LABELLING OF PREPACKAGED FOODS (CLASS NAMES)
(ALINORM 01/22, APPENDIX VI)**

GOVERNMENT COMMENTS AT STEP 6

UNITED KINGDOM:

The United Kingdom is aware that this issue has remained unresolved for some time. We have therefore taken this opportunity to reconsider the matter, and our position, in detail. We have taken full account of the need to ensure that consumers receive sufficient information from ingredient lists to make properly informed choices.

We now take the view that the draft amendment is unsatisfactory. It is misleading to the consumer to allow an ingredient described as “milk protein” or “milk protein product” to contain only 30/35% milk protein. There is no provision in the present proposal for substances (other than those covered in paragraph 4.2.1.4) making up the remaining 65-70% of the ingredient to be declared in the ingredient list. This may mislead consumers by implying that the product has a higher milk protein content than is actually the case because of the position in the ingredient list of the term “milk protein” or “milk protein product” (ingredients being listed in descending order of ingoing weight – paragraph 4.2.1.2). This implication will be reinforced if the new proposals to introduce quantitative ingredient declarations are adopted in their present form (CL 2000/35-FL).

The United Kingdom would therefore encourage the Committee to reconsider, in place of the present proposal, the approach already adopted by the member states of the European Union. There the term “milk protein” is permitted to be used for ingedient listing purposes to describe “any caseins, caseinates or whey proteins, or any mixture of these”. This class name has been in use within the EU since 1993 and has given rise to no problems.

EUROPEAN COMMUNITY:

The European Community remains in favour of adding just one class name, "milk proteins", for ingredients in this class.

For many years, Community legislation (Directive 2000/13/EC) has allowed the use in the list of ingredients of the class name "milk proteins", which covers all proteins obtained from milk (casein, caseinates and whey proteins), i.e. products with a high protein content. The use of this class name has not given rise to any criticisms or to any particular problems.

The European Community therefore considers that the class name "milk proteins" should be used only for ingredients with a high milk protein content (for example 50 %).

The use of the class name "product containing milk proteins" for products with a low protein content would lead to confusion. On the one hand, this expression is too vague to provide consumers with sufficient information and, on the other, it is likely to mislead them as to the actual milk protein content of the product in question.