

# codex alimentarius commission



FOOD AND AGRICULTURE  
ORGANIZATION  
OF THE UNITED NATIONS

WORLD  
HEALTH  
ORGANIZATION



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**Agenda Item 6**

**CX/FL 01/8**

**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:**

**NEW ZEALAND  
SPAIN**

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

**GOVERNMENT COMMENTS AT STEP 6**

**NEW ZEALAND:**

New Zealand supports the definition proposed by CCMMP, which is:

*Milk Protein Products: Milk products containing a minimum of 35% (m/m) of any type(s) of milk protein. If the content exceeds 50% (m/m), the word 'product' may be omitted.*

The reasons are as follows:

- The term “milk protein product” informs consumers of the presence of milk protein in foods, and the definition is straightforward.
- The term “milk protein” may optionally be used if the protein content is above 50%. The term is used only in ingredients lists and will not be mistaken as implying that pure protein has been added.
- The range of protein content is broad enough to cover the range of milk products with a significant protein content that are used as ingredients.

In addition, we note that the use of class names is not mandatory under the GSLPF, so it is always possible to use a more specific product name.

**SPAIN:**

The Name “Milk Protein Products” is quite confusing, at least in Spanish, since the term “Products” is undefined and could lead one to believe that there are various compound products, in this case, from milk proteins.

On the other hand, the definition that appears in item 50 of ALINORM 01/22, where it includes the possibility of using the names: “Milk protein” or “Milk protein products”, depending on whether their protein content surpasses 50% (m/m) or a minimum of 35% (m/m), respectively, does not clarify anything for consumers, because consumers are really interested in the total amount of protein added, and this cannot be verified just by naming the ingredient.

Therefore, we can deduce from the foregoing that, not only do both names not clarify anything for consumers, but rather, to the contrary, they could lead to mistakes, making them think that they are dealing with different ingredients when, in reality, the only thing that varies is the percentage of milk protein in each one.

We propose once again that the class name be “Milk protein” exclusively and that it have a minimum content of 35% (m/m).