codex alimentarius commission

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

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Agenda Item 5 **CX/FO 01/5-Add.1**

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FATS AND OILS
Seventeenth Session
London, United Kingdom, 19 – 23 February 2001

PROPOSED DRAFT STANDARD FOR FAT SPREADS AND BLENDED SPREADS GOVERNMENT COMMENTS AT STEP 3

The following comments have been received from Canada, Japan and Thailand in response to CL 1999/3-FO and CL 2000/24-FO.

CANADA

1. Scope

The scope statement clearly identifies that products *"...with a fat content of less than 2/3 of the dry matter (excluding salt)"* are excluded from the standard. This raises a question of the remaining 1/3 of the dry matter. This is a significant portion of non-fat content, however, there are no criteria established indicating just what this 1/3 non-fat component may consist of. Canada is of the opinion that criteria for the non-fat component should be established.

2. Description

2.1 Fat Spreads and Blended Spreads

Canada suggests that the sentence currently in the standard be replaced by the following:

"The products covered by this standard are foods that are plastic and fluid emulsions, principally of water and edible fats and oils."

Furthermore, it is suggested that the phrase in square brackets be deleted.

2.2 Edible Fats and Oils

Canada supports the definition for "Edible Fats and Oils" as contained in the draft standard.

3. Essential composition and quality factors

3.1.1 Fat Spreads

3.1.1.1 Canada does not support the addition of milk fat to these types of products. Addition of milk fat, along with the addition of some colours increases the potential for marketing "imitation dairy products" and practices which could deceive the consumer with respect to the true nature of the product.

Canada is of the opinion that there should be another essential composition factor included in the criteria for these products. Canada recommends that it should be stipulated that the erucic acid content should not exceed 5%. In many countries these types of products are consumed by individuals as an alternative to

butter or other dairy spreads. Animal studies have indicated a link between consumption of high amounts of erucic acid and the development of myocarditis (heart lesions).

3.1.1.2 Canada supports the fat content specifications for margarine; however, the specifications for the reduced fat products should be simplified. It is suggested that products be simply referred to as "calorie-reduced" with the fat content indicated. Therefore, instead of four possible names for "half fat margarine" it could be referenced as "50% calorie-reduced margarine".

In addition to reducing the fat content, it is essential that the caloric content also be reduced. It is suggested that this section of the standard be modified such that the essential composition and quality criteria also reflects a reduction in calories in addition to a reduction in fat content.

3.1.2 Blended Spreads

3.1.2.2 As indicated in our comments with respect to Section 3.1.1.2, Canada suggests that this section can be simplified by referring to "calorie-reduced" blends with an indication of the percentage of caloric reduction. As in 3.1.1.2, it will be necessary for the essential composition and quality criteria include both fat content and caloric reduction.

8. Methods of analysis and sampling

Canada suggests that there is a requirement for the inclusion of a method for determining the fatty acid content if an erucic acid limit is established. In that regard, we suggest AOCS Ce 1f-96 (Determination of cis- and trans- fatty acids in hydrogenated and refined oils by capillary GLC).

JAPAN

Name of the Standard →(Standard for Margarines and Blended Margarines)

For the name of the Standard, the words "margarines" and "blended margarines "should be used instead of 'fat spreads' and 'blended spreads' respectively because the standard is applicable to margarines, the word margarine has long been used in the current CODEX standard and consumers are more familiar with it. The "margarines" and "blended margarines" referred to here should include margarines plus fat spreads of 3.1.1 below and blended margarines plus blended fat spreads of 3.1.2. below, respectively. Thus, in this paper, the titles written in brackets after an arrow are the new reformed titles in accordance with the requests herein .

1. Scope

UPPER LIMIT OF CONTENT - THE UPPER LIMIT OF FAT CONTENT, 90%, IN THE STANDARD SHOULD NOT BE DEFINED BECAUSE PRODUCTS FOR OTHER USES THAN SPREADS WITH FAT CONTENT EXCEEDING 90% ACTUALLY EXIST. MOREOVER, CONSIDERING THE FACT THAT THERE IS NO UPPER LIMIT OF FAT CONTENT IN THE CODEX STANDARD FOR BUTTER, THE UPPER LIMIT OF FAT CONTENT IN THE STANDARD IS NEITHER NECESSARY.

2. Description

2.1 Fat Spreads and Blended Spreads→ (2.1 Margarines and Blended Margarines)

The words 'that is firm and spreadable at 20°'should be deleted. Considering the variety of forms of margarines and fat spreads available nowadays and the expected development of various types of products in the future, many fat products would not be 'firm and spreadable at 20°'.

3. Essential composition and quality factors

3.1 Composition

3.1.1 Fat Spreads→ (3.1.1 Margarines)

3.1.1.2 The Fat content

There seems to be no rational reasons and merits in defining different types of 'fat spreads' by their fat content at intermittent or discontinuous intervals as it would only confuse consumers. Thus products with a fat content of 80% or more should be defined as margarines and products with a fat content of less than 80% should be defined as fat spreads. In addition, these fat spreads should have their fat content labelled on the product.

3.1.2 Blended Spreads → (3.1.2 Blended Margarines)

Blends and blended spreads are products which were originally derived from margarines and fat spreads. Therefore, the word blended margarine should be used instead of blend and the word blended fat spread should be used instead of blended spread.

Blends →Blended margarines

Blended spreads→Blended fat spreads

3.1.2.2 The Fat Content

Definitions of blends and blended spreads by their fat content at intermittent or discontinuous intervals seems unnecessary for the same reasons in 3.1.1.2. Thus, like in 3.1.1.2, products with a fat content of 80% or more should be defined as blended margarines and those with a fat content of less than 80% should be defined as blended fat spreads. Blended fat spreads should have their fat content labelled on the product.

3.2 Permitted Ingredients

The following ingredients should be added to the list of permitted ingredients in the Standard because fat spreads containing these are actually available:

Sugar alcohol (reducing starch syrup, reducing maltose syrup); Fruit; Processed fruit; Chocolate; Cocoa; Nut paste; Spice; Liquor; Vinegar.

4. Food additives

The following food additives in the Standard cannot be used for margarines and fat spreads in Japan because they are not acknowledged as food additives in Japan.

4.1 Colours - 160e, 160f

4.3 Emulsifiers - 432, 433, 434, 435, 436, 472(d), 472(f), 474, 479a, 479b, 481, 482

4.4 Preservatives - 203, 212, 213

4.5 Thickening and stabilizing agents - 402, 403, 404, 463, 464, 465, 500(iii)

4.6 Acidity regulators - 261, 263, 326, 331(i), 331(ii), 335(i)

4.7 Antioxidants - 302, 308, 309, 319, 389

4.8 Antioxidant synergists - EDTA

4.10 Flavour enhancers - 624, 626, 628, 629, 630, 632, 633, 959

4.11 Miscellaneous - 920, 938, 942

Moreover, out of the food additives in the Standard, the maximum levels of the following additives permitted for addition to margarines and fat spreads in Japan are as follows;

	Maximum Level
4.4 Preservatives	
200, 202, 210, 211	1000 mg/kg Singly or in combination
4.5 Thickening and stabilizing agents	
405	1.0 g/kg
461, 466	2.0 g/kg Singly or in combination
4.6 Acidity regulators	
327, 333, 341, 526	10 g/kg
4.7 Antioxidants	
310	100 mg/kg
321	200 mg/kg
4.10 Flavour enhancers	
509, 623	10 g/kg
4.11 Miscellaneous	
405	600 mg/kg

THAILAND

Section 3. Essential Composition and Quality Factors

Thailand would like to propose the fat content of Blend at 80-90% in order to be consistent with the fat content in margarine.