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MATTERS REFERRED TO THE COMMISSION BY CODEX COMMITTEES

MATTERS REFERRED FROM THE 36TH SESSION OF THE COMMISSION

PROCESSED CHEESE: REPORT OF THE ELECTRONIC WORKING GROUP

Introduction

1. The 36th session of the CAC decided to make a further effort to determine if it is possible to develop a Codex standard for processed cheese. The Commission agreed to establish an electronic working group (eWG) led by New Zealand and Uruguay to undertake this further work and report back to the 37th session of the CAC. The CAC agreed that the eWG:

- Would conduct a study on the possibility to develop standard(s) for processed cheese and, depending on the outcome of the study, prepare project document(s) for new work on standard(s) for processed cheese that would clearly define: (i) the scope of the standard(s) and the products to be covered; (ii) the compositional aspects of these products, i.e. minimum cheese content; and (iii) acceptability of use of gelatine, starches and stabilizers in the manufacture of processed cheese; and
- Could also consider the possibility of developing a standard covering products analogous to processed cheese where cheese and milk products have been substituted by non dairy ingredients.

Summary of process

2. A total of 43 member countries, 1 member organization (EU) and 3 non-governmental observer organizations registered to participate in the working group. A list of eWG members and respondents is set out in Annex 1.

3. A questionnaire covering the main issues was circulated to all participants (see Annex 2). Responses were received from 32 countries and 1 observer organization. Some countries and organizations also offered comments that were not part of the questionnaire. One member organization (the EU) did not respond formally to the questionnaire as such but offered some general comments. Similarly one non-governmental observer organization (IDF) did not submit any response to the questionnaire but offered its technical support to the working group. The work of the eWG was conducted in English and Spanish.

Analysis of responses

Scope and product coverage

4. Twenty-seven countries reported the existence of a national standard for processed cheese but the scope of such national standards varied significantly. Some countries had detailed and specific standards covering processed cheese and other types of processed cheese products, and a number of these countries reported that their standards were broadly aligned with the revoked Codex *Standard for Processed Cheese and Spreadable Processed Cheese*. Other countries had broad standards for processed cheese that covered a wide range of products, and two countries had only a product definition. One country reported that its standard was voluntary; four countries had no standard.

5. Most countries that replied considered that an essential characteristic of processed cheese is that it is produced through a process of grinding, melting by heat and emulsifying the cheese mix, with or without added dairy ingredients or food flavourings/flavouring additives, to produce a product with the requisite characteristics. Some of the essential characteristics listed include cheese content, spreadability or sliceability, smooth blended texture and product stability. Some countries mentioned organoleptic characteristics. Processed cheese is generally regarded as a dairy-based food, in which there should be no

substitution of dairy ingredients. From the responses it can be concluded that there is a fair degree of agreement and common understanding on the essential characteristics of processed cheese.

6. With regard to Question 1.3, responses varied from those countries that supported the statement that the term processed cheese be limited to products containing cheese and milkfat (for standardization) to others who considered the name appropriate to describe products containing cheese, milkfat and other dairy ingredients. Countries that favoured the use of only cheese and milkfat suggested that products including other dairy ingredients should use different names. Some of the countries that allowed other dairy ingredients suggested they should be justified according to technological need, or should be limited by imposing maximum lactose content.

7. With regard to Question 1.4 about the need to include the manufacturing process in any international standard, responses varied with some 21 countries stating that they saw description of the manufacturing process as an integral part of the standard, considering it should be brief, and only showing its essential steps. Others did not see this as essential and suggested that there was no need to describe the process as long as the essential ingredients and product characteristics and composition were clearly specified and indicated. Some members expressed concern that inclusion of detailed manufacturing processes could stifle product innovation as underlined by the wide range of processed cheese and processed cheese products traded internationally. On the other hand one member considered the characteristic process(es) should be included, to avoid misleading consumers. Some countries proposed that a standard should not be more restrictive than that for cheese, which specifies a manufacturing process but allows for alternative processing techniques that result in an end product with similar physical, chemical and organoleptic characteristics. One country suggested the manufacturing process could be summarized in an annex. Balance of analysis would indicate a preference for inclusion of the manufacturing process in any international standard.

Composition of the products and minimum cheese content

8. The aim of this question was to obtain members' views about cheese content of processed cheese. In this questionnaire many countries commented that cheese content is an important characteristic of processed cheese.

9. Response to the question on minimum cheese content (2.1) was again divided with some 17 countries supporting the specification of a minimum cheese content while others were happy to leave this unspecified as long as the information is available from the label. Some other countries ensured cheese content in processed cheese by limiting non-cheese ingredients, or by requiring that cheese is the main ingredient, or the main dairy ingredient, or forms a specified proportion of the dairy ingredients. Where a minimum cheese content was suggested, the amount ranged from 30% to 80% though in many cases it was not clear how it was expressed. Eight countries expressed the view that if a minimum cheese content were to be set at the international level they could support it being set at 50%, and four other countries did not specify a minimum cheese content but were of the view that cheese should be the main ingredient. Three countries noted that it was not possible to quantify the percentage of cheese in the final product.

10. The question of cheese content was further confounded by the method of expression. Some countries expressed cheese content as a proportion of the cheese mix and others as a proportion of the finished product, and sometimes it was calculated on a 'whole basis' and sometimes on a 'dry matter basis'. This means that figures cannot be compared unless they are expressed on the same basis.

11. Some countries mentioned standards for named-variety processed cheese which specify, typically, a minimum content of 75% of the named cheese variety in the product. For named-variety processed cheese many countries suggested the declaration of the percentage of the named variety cheese in the final product.

12. In additional comments relating to cheese content, some countries suggested including a specification of maximum lactose content of 5% as a way of limiting the addition of dairy ingredients other than cheese and milkfat (for standardization). National legislation in a number of countries stipulated a maximum level for lactose.

13. Countries mentioned other factors of interest, including dry matter content (or conversely the moisture content), fat content in the dry matter, protein content, sensory characteristics, physico-chemical properties, content of non-dairy ingredients or characterizing foods, content of fresh cheese, salt content, pH, microbiological requirements and content of melting salts and other food additives. Several countries emphasized the need to ensure that dairy ingredients are not substituted by non-dairy ingredients.

Acceptability of gelatine, starch and stabilizers

14. Responses on this issue were divided. Fifteen countries allowed the use of gelatine, starch and stabilizers with technological justification or within specified limits; eleven countries did not allow starch or gelatine or both but allowed stabilizers; six countries did not support the addition of any of these substances in processed cheese. Some of the countries opposed to use of gelatine, starch and stabilizers in processed

cheese were prepared to accept their use in manufacture of processed cheese products/preparations. Some countries were opposed to the use of gelatine for cultural/religious reasons while others considered that use of substances such as gelatine and starch were not technologically justified, and had the potential to substitute for dairy ingredients and were therefore likely to mislead consumers. Some countries drew an analogy with the Codex standards for cheese, which do not allow starch as an ingredient (except for unripened cheeses).

Alternative Names

15. Most respondents were comfortable with the term processed cheese and did not see any need to look at alternative terminology. Some countries suggested the term melted cheese which is also the expression used to describe processed cheese in Spanish speaking countries. In a number of countries the local name for the product translated to melted cheese but considered the term processed cheese as accurate and did not see the need for any alternative terminology. Several countries suggested alternative names for products that fall outside the definition of processed cheese, such as “processed cheese product”, “processed cheese food”, “processed cheese preparation”, “processed cheese spread”, “blend of processed cheese and other dairy component” or “spreadable cheese”.

16. Most countries stated that a critical issue is to ensure that the name used is an accurate description of the product and does not mislead consumers as to the true nature of the product. Many countries stressed that products marketed as processed cheese must contain cheese.

Labelling of Processed Cheese

17. In addition, a major point emphasized by most respondents was that products marketed as processed cheese should be labelled in accordance with the *General Standard for the Labelling of Prepackaged Foods* (GSLPF) and the *General Standard for the Use of Dairy Terms* (GSUDT). These were important to clearly convey to consumers the nature of the product. Some countries mentioned the need to identify specific labelling requirements related to named variety cheese.

Other comments

18. Two responses provided additional comments that were not part of the questionnaire. Both emphasized that there is no need for a Codex standard for processed cheese. They noted the absence of trade problems, that trade in these products has grown steadily over the last few years and that there are no obvious gaps in safety and quality provisions of existing Codex horizontal texts that would justify new work on processed cheese. They also recalled that the Committee on Milk and Milk Products (CCMMP) had deployed intensive efforts and resources to develop an international standard on processed cheese for more than a decade but could not reach agreement in particular on the compositional aspects due to the wide variety of products currently traded.

Products analogous to Processed Cheese

19. The terms of reference of the eWG also called for an examination of the possibilities for developing a standard for products analogous to Processed Cheese where some or all of the dairy ingredients are replaced by non-dairy substitutes (e.g. vegetable oils instead of milkfat).

20. Response to specific questions was sought only if a country saw the need to develop one or more international standards covering products analogous to processed cheese. Some 13 countries and one member organization stated clearly that they did not support any international standard for analogous products. Some of the reasons stated included that the GSLPF and the GSUDT already contained adequate guidance relevant to analogous products. It was noted that there was potentially a huge range of products to be covered, that a standard would be quickly outdated due to technological development, that there was no impediment to trade and that trade had grown steadily. A further comment was that such analogous products are often used for further processing and are made to specifications of the food industry. One country suggested it would be useful to develop a discussion paper on the topic. Some 17 countries provided specific comments to one or more of the questions without stating clearly if they were in favour of developing an international standard for analogue products. Three countries stated clearly in their questionnaire response that they supported development of international standard or a definition. One observer, the Association of European Coeliac Societies(AOECS), pointed out that products analogous to processed cheese pose an extremely high risk for coeliacs if gluten is used because cheese analogues cannot be distinguished from cheese e.g. at breakfast buffets.

21. From the responses it was clear that the products are produced and marketed in a number of countries. Some countries had or were developing national standards for various types of analogous products made with dairy and non-dairy ingredients. Some of the names mentioned include sandwich slice, blend of processed cheese and vegetable fat and/or oil, processed analogue cheese with (partial) dairy origin, processed cheese with vegetable protein, cheese-based specialty food, imitation processed cheese

and food preparations. Some countries have a national standard covering the composition and labelling of such products.

22. Members who commented on this issue were concerned about the naming and labelling of such products. Eight countries stated that it would not be appropriate to use the term 'cheese' or any other dairy term in the name of products analogous to processed cheese as this would be misleading and not consistent with the GSUDT and the GSLPF. Twelve other countries considered the word 'cheese' could be used as part of the name, with appropriate qualification, where the product does in fact contain cheese.

Conclusions

23. This questionnaire has elicited a substantial number of responses covering all Codex regions and including both exporting and importing countries. It was clear that processed cheese and related products are produced and traded in a wide range of countries. A significant number of countries have national standards for one or more types of processed cheese and processed cheese products. Some of the existing national standards are based on the revoked Codex Standard for Processed Cheese.

24. As anticipated there was near unanimity with regard to the product characteristics and method of processing of processed cheese and countries did not see any issues with the current name. All agreed that any product that is labelled as processed cheese must contain cheese with the addition of milkfat for standardization and some allowed other dairy ingredients, usually within specified limits. There was however a range of views on matters related to product composition and how the cheese content should be controlled and declared. As expected a number of countries would like to see minimum cheese content to be prescribed in any standard either on a whole product basis or as percentage of dry matter similar to what was specified in the revoked processed cheese standards. Some countries ensure cheese content by limiting non-cheese ingredients, or imposing a maximum lactose content, or requiring it to be the main ingredient. Other members were of the view that there was no need to prescribe a minimum but more important for the product to clearly indicate the cheese content on the label.

25. On the issue of acceptability of gelatine, starch and stabilizers there are a range of national requirements and positions. In some countries national standards do not prohibit the use of gelatine, starch or stabilizers in the production of processed cheese. Others explicitly prohibit the use of some or all of these substances for cultural or other reasons. Some consider their use is not technologically necessary or justified, or that they may substitute for dairy ingredients. Given the range of views it is clear that the inclusion of provisions for use of gelatine and starch remains a point of difference both in terms of preference and national regulation. It is noteworthy that the usage of these substances is largely governed by national legislation and/or consumer preferences. A consensus at the international level remains a challenge. One possible option might be to provide for their use on the basis of national legislation or requirements.

26. With regard to products analogous to processed cheese, the main issue and concern was around product name, description and labelling. Some countries considered that analogues of processed cheese cannot and should not use the term 'cheese' or any other dairy term as such use would be misleading and inconsistent with the provisions of the GSUDT, though others considered the word 'cheese' could be used as part of the name, with appropriate qualification, where the product does in fact contain cheese. It was also pointed out that analogous products made with substitute ingredients are non dairy products and as such would fall outside the scope of CCMMP. Overall there was not a lot of support for the development of international standard(s) for such products.

27. The latest survey has confirmed the existence of one or more national standards for processed cheese in most of the countries that participated in the survey. Clearly the scope and coverage of these standards varied from country to country. Some regions such as the Mercosur countries have sought to promote regionally harmonized standards for processed cheese. What is less clear from the survey is the extent to which national standards are being used as a basis for trade. As noted in the previous analysis there are no known impediments to international trade in processed cheese and related products. There are a wide range of products being traded internationally, reflecting the evolution of markets in terms of product development and innovation and consumer preferences. Yet it is perhaps this diversity and range of products in the market place that has also prompted interest and demand for an international standard covering the core elements of product description, composition and use of specific substances. Some of the interest is also driven by concerns about product quality such as cheese content or protein content and shelf life.

28. In this regard it is worth mentioning the protection offered by provisions of the GSUDT and the GSLPF, as already noted by some respondents. Under the GSUDT, processed cheese, when named as such, is a milk product or a composite milk product and attracts conditions on its ingredients and labelling. The GSLPF requires date marking, storage instructions if necessary, and a list of ingredients including declaration of the ingoing percentage of cheese by weight at the time of manufacture.

Prospects for new work and possible way forward

29. The development of an international standard for processed cheese depends on the ability to forge international consensus on the core issues of product description, composition and acceptability of use of gelatine, starch and stabilizers. The latest survey carried out by the eWG has confirmed the existence of diverse national standards and strongly-held positions that reflect a combination of national preferences and obsolete international standards (the old revoked Codex Standards for Processed Cheese). In these circumstances it may be more productive to focus on general principles rather than specific provisions. Many countries continue to have strong positions/preferences on issues such as cheese content and acceptability of starch and gelatine. These positions reflect a combination of factors such as, the need for transparency about product composition, protection of dairy terms, fair trade, tradition and national standards and regulations. It is also useful to note that many of the countries calling for an international standard for processed cheese regard an international standard as providing the necessary assurance about their expectations on product composition, product description and fair trade. Some countries consider it is necessary to specify minimum heat treatment conditions or microbiological standards or both.

30. Against this background any renewed effort at developing an international standard for processed cheese might require a somewhat different approach to those adopted in the past and need to take account of the realities of international market and diversity of national standards and/or preferences.

31. Based on the analysis of the responses to the eWG, one possible approach might be to re-examine the prospects for constructing a generic standard for processed cheese along the lines of the existing Codex *General Standard for Cheese* (Codex Stan 283-1978) that includes broad provisions relating to scope, product description, essential composition and quality factors, food additives, contaminants, hygiene and labelling. Such an approach was tried before and any successful outcome will depend on the willingness of members to compromise on core issues.

32. Turning to particular issues, attempting to seek consensus around any specific level of cheese content might prove problematic. A generic standard could include a general statement that cheese should be the main ingredient of the product. Such a solution while not meeting the needs of those countries that are calling for inclusion of a specific level of cheese content, at least helps address some of their expectations and provide a basis for a more elaborate standard at the national level if this is indeed considered necessary. Such an approach also represents a de facto recognition of the diversity of products on the market and the wide market preferences.

33. A standard for processed cheese might look to existing Codex standards for precedents. There are standards for a variety of processed foods which include or are named for a characterizing ingredient, such as chocolate, fish sauce, fish sticks, fruit jams and jellies, mango chutney, luncheon meat, beef bouillon or consommé, fermented soy paste and drinks based on fermented milk. Some standards specify a minimum content of the characterizing ingredient, such as cocoa solids in dry matter, or content of a specific protein, or percentage of raw materials in the finished product. Others allow greater flexibility by specifying minimum nitrogen content or amino acid content, or requiring characteristic odour and taste, while others provide for alternative levels to be used according to national legislation, or require label declaration of the proportion of the characterizing ingredient.

34. Similarly given the divergent national positions on use of gelatine and starch it may not be possible to achieve consensus on the basis of their use or otherwise. A generic standard could provide a framework for countries to establish more specific national provisions covering use of gelatine, starch and stabilizers in accordance with Good Manufacturing Practice (GMP) or national preferences. This approach, while not ideal, is already applied in a number of committees to deal with issues where it is not possible to reach agreement on one specific value or provision. Another option could be to follow the pattern of some existing Codex standards for milk products, such as fermented milk products, dairy fat spreads, cream and prepared creams and unripened cheese, which allow for the use of gelatine and starch on condition that they are used only in amounts functionally necessary as governed by good manufacturing practice, taking into account any use of listed stabilizers and thickeners.

35. If members of the Commission, as a whole, are willing to consider such an approach to any future work on processed cheese there may be a pragmatic basis to move forward on this issue and go some way to meeting members' expressed need for international guidance. It might also be that a general standard for processed cheese may provide a framework to consider the possible development of more detailed product parameters at some point in the future. A draft Project Document proposing the development of a generic standard for processed cheese is set out in Annex 3 of this report.

Recommendations

36. It is recommended that the Commission:
- a. **Note** the analysis and conclusions of the electronic working group on the issue of developing an international standard for processed cheese;
 - b. **Agree** that the divergent national requirements and preferences with regard to the core issues of cheese content, use of other dairy ingredients and acceptability of use of gelatine, starch and stabilizers remain significant impediments to forging international consensus unless members were open to considering alternative and more flexible approaches (along the lines set out in paras 29 to 35) to constructing a more general standard that provides a framework for such products while recognizing the differing national preferences particularly with respect to product composition;
 - c. **Note** that a draft Project Document (see Annex 3) has been prepared in line with Terms of Reference of the eWG and provides a possible basis for any new work that may be agreed;
 - d. **Agree** that any new work needs to be time limited; and
 - e. **Note** that there was no clear consensus in the eWG on the need for developing any Codex standards covering products analogous to processed cheese.
37. One member did not accept recommendation (c) and instead proposed that it should be written as follows:
- c. **Agree** to petition member countries for their level of commitment to compromise on the core issues, i.e. cheese content, use of other dairy ingredients, and use of stabilizers, gelatine and starch, before any new work is agreed to.

Annex 1**ELECTRONIC WORKING GROUP ON PROCESSED CHEESE: LIST OF PARTICIPATING MEMBERS AND OBSERVER ORGANIZATIONS**

1. Argentina
 2. Australia
 3. Austria
 4. Brazil
 5. Canada
 6. Colombia
 7. Costa Rica
 8. Cuba
 9. Czech Republic
 10. Denmark/Dinamarca
 11. Dominican Republic/Republica Dominicana
 12. Egypt/Egipto
 13. France/Francia
 14. Germany/Alemania
 15. Ghana
 16. Hungary/Hungria
 17. India
 18. Iran/Iran (Republica Islamica del)
 19. Iraq
 20. Ireland/Irlanda
 21. Jamaica
 22. Japan/Japon
 23. Kenya
 24. Korea/Corea
 25. Lebanon/Libano
 26. Libya/Libia
 27. Mexico/Mexico
 28. Morocco/Marruecos
 29. Netherlands/Paises Bajos
 30. Nicaragua
 31. Papua New Guinea/Papua Nueva Guinea
 32. Paraguay
 33. Poland/Polonia
 34. Russia/Rusia
 35. Saudi Arabia/Arabia Saudita
 36. Singapore/Singapur
 37. Spain/Espana
 38. Switzerland/Suiza
 39. Thailand/Tailandia
 40. Turkey/Turquia
 41. Uruguay
 42. United Kingdom/Reino Unido
 43. USA /Estados Unidos de America
 44. European Union/Union Europea
- Non-Governmental Organizations**
45. Association of European Coeliac Societies/Asociación de Sociedades Europeas de Celíacos
 46. European Chemical Industry/El Consejo de la Industria química europea
 47. International Dairy Federation/Federación Internacional de Lechería

Annex 2

QUESTIONNAIRE ON THE DEVELOPMENT OF STANDARDS FOR PROCESSED CHEESE AND PRODUCTS ANALOGOUS TO PROCESSED CHEESE**Processed cheese and processed cheese products based essentially on dairy ingredients****1. Scope and products to be covered**

A key issue is the scope of the standard and the products to be covered.

The term 'processed cheese' is used to cover products of varying compositional characteristics depending upon the country of manufacture. In some countries the range is restrictive and covers those products containing only cheese with milkfat added for fat standardisation. In other countries the name 'processed cheese' covers a range of products that contain not only cheese but other dairy products (e.g. milk protein concentrate (MPC), rennet casein, skim milk powder and/or whole milk powder) and/or other non-dairy ingredients that do not replace dairy ingredients, e.g. gums, starches.

Questions:

- 1.1. Do you have a national standard for processed cheese or similar products? If so, what is its scope and what types of processed cheese products are covered?
- 1.2 What, in your view are the essential characteristics of processed cheese or similarly named products?
- 1.3 Should products named processed cheese be limited to those containing only cheese and milkfat for standardization? If so, how should processed cheese be defined to exclude other products?
- 1.4 In your view, should the manufacturing process be included in the standard for processed cheese?

2. Composition of the products

The cheese content of processed cheese is an important issue because the name of the product, interpreted according to the *General Standard for the Use of Dairy Terms*, suggests that it is a milk product with cheese as a characterizing ingredient. In previous discussions on processed cheese it has not been possible to reach consensus on the cheese content of processed cheese. Given this situation, it would be useful to get the views of eWG members on

- whether it is necessary to specify a minimum cheese content and if so how; or
- whether another characteristic of the product should be specified; or
- whether it is sufficient to disclose the ingoing percentage of cheese in the ingredients list.

Questions:

- 2.1 Should minimum cheese content be specified? If so, what should the minimum be and what should be the method of expression (e.g. whole cheese basis)?
- 2.2 Can you suggest an alternative way of specifying the essential characteristic(s) of processed cheese, other than cheese content? Please provide details.
- 2.3 Do you consider it is necessary to define maximum and minimum values for other parameters/components? Please provide details.

3. Acceptability of use of gelatine, starches and stabilizers in the manufacture of processed cheese

Gelatine, starches and stabilizers provide thickening, texture and stability to foods. Previous discussions on processed cheese did not result in any consensus on their use because of their potential to allow higher water content and/or to allow lower content of cheese or other dairy ingredients. The products might therefore be considered not to be milk products.

Questions:

- 3.1 Please outline your views on whether it is acceptable to use gelatine, starches or stabilizers as ingredients in processed cheese, and if so, under what conditions. If you consider it is not acceptable, please provide reasons.

4. Labelling of processed cheese

Processed cheese is a generic description for products that are marketed under a wide variety of names in different parts of the world.

Questions:

- 4.1 If you consider the term “processed cheese” is misleading, can you suggest an alternative name (e.g. melted cheese, processed cheese product)?

5. Other requirements

Question:

- 5.1 Please indicate any other minimum requirements you consider should be included in the standard(s).

Products analogous to processed cheese

This part of the questionnaire deals with the development of an international standard covering products analogous to processed cheese where cheese and milk products have been substituted partly or wholly by non-dairy ingredients. Typically these products are likely to contain varying proportions of non dairy fats and proteins.

Do you consider it is necessary to work on the development of an international standard for products analogous to processed cheese? If yes please respond to the questions set out below. If no please explain why you don't see the need for any work on such a product.

1. Scope and products to be covered

The main issue is the scope of the standard and what products should be covered in a standard for “products analogous to processed cheese”.

Questions:

- 1.1 What products analogous to processed cheese are sold on your domestic market, and what are some of the names used?
- 1.2 Do you have a national standard for these products? If so, what is its scope and what types of analogous products are covered?
- 1.3 In your view what are the essential provisions in an international standard for products analogous to processed cheese?

2. Composition of the products

The composition of products analogous to processed cheese should be clearly defined, including in particular the content of cheese and other dairy ingredients.

Questions:

- 2.1. Should minimum cheese content be specified? If so, what should the minimum be, what should be the method of expression (e.g. whole cheese basis)
- 2.2 Can you suggest an alternative way of specifying the essential characteristic(s) of products analogous to processed cheese, other than cheese content? Please provide details.
- 2.3. Should any other minimum compositional requirements be included in an international standard for products analogous to processed cheese? Please provide details.

3. Acceptability of use of gelatine, starches, stabilizers and in the manufacture of products analogous to processed cheese

Gelatine, starches and stabilizers provide thickening, texture and stability to foods. They have the potential to allow higher water content and/or to allow lower content of cheese or other dairy ingredients-

Questions:

- 3.1. Please outline your views on whether it is acceptable to use gelatine, starches or stabilizers as ingredients in products analogous to processed cheese, and if so, under what conditions. If you consider it is not acceptable, please provide reasons.
- 3.2 Do you consider it is necessary to define maximum and minimum values for other ingredients (i.e. non dairy proteins and non dairy fats)?

4. Labelling of products analogous to processed cheese

Products analogous to processed cheese are currently marketed under a variety of names. An issue that needs consideration is whether current names are accurate descriptions of the product(s) in terms of nature and composition.

Question:

- 4.1 Do the names (question 1.1) accurately describe the nature of these products? If not do you have any alternative suggestions for describing products analogous to processed cheese?
- 4.2 Do you consider it is appropriate that products analogous to processed cheese make reference to the word "cheese" in the name?

5. Other requirements**Question:**

- 5.1 Please indicate any other minimum requirements you consider should be included in the standard(s).

Project Document

General Standard for Processed Cheese

1 Purpose and scope of the proposed document

The purpose of the proposed document is to construct a generic standard for processed cheese along the lines of the existing Codex *General Standard for Cheese* (CODEX STAN 283-1978) that includes broad provisions relating to scope, product description, essential composition and quality factors, food additives, contaminants, hygiene and labelling.

2 Relevance and timeliness

Processed cheese is a milk product (prepared with a mixture of cheeses and other ingredients) that is widely used in the home and in food establishments which provides advantages of shelf life, nutrition and safety.

The Commission in 2010 revoked standards for processed cheese and processed cheese products, following a recommendation from CCMMP that as they were outdated and no longer being used by industry.

CCMMP attempted to develop a revised standard for processed cheese over a long period of time but was unable to reach consensus on a number of core issues such as minimum cheese content and use of substances such as starch and gelatine. Accordingly the CCMMP decided to discontinue work at its 8th session in Feb 2010.

However discussions in the Commission and in FAO/WHO coordinating committees and responses to Circular Letters have indicated a substantial level of interest from a broad spectrum of Codex membership in developing a standard for processed cheese with a focus on developing a general standard.

3 Main aspects to be covered

The proposed standard will provide a framework for processed cheese while recognizing the differing national preferences particularly with respect to product composition, while allowing flexibility to accommodate divergent national requirements and preferences with regard to the core issues of minimum cheese content, use of other dairy ingredients and acceptability of use of gelatine and starch.

The standard could be developed along the lines of the existing Codex *General Standard for Cheese* (CODEX STAN 283-1978) that includes broad provisions relating to scope, product description, essential composition and quality factors, food additives, contaminants, hygiene and labelling.

4 Assessment against the criteria for the establishment of work priorities

General criterion

The proposed standard will contribute to consumer protection from the points of view of interest to Codex. It will:

- Provide a recognized standard for a product that is widely consumed in many countries as a milk product
- Contribute to food safety by detailing appropriate methods of processing (heat treatment) and composition
- Ensure fair practices in the food trade by providing a standard recognized in both exporting and importing countries, and include labelling of significant information (e.g. ingredient declaration and product composition)
- Satisfy needs of developing countries by providing a framework for more consistent national standards for processed cheese; and for a food with a relatively long shelf life with some products not requiring refrigeration
- Help to avoid misleading consumers on these products and will provide more transparency in international trade.

Criteria applicable to general subjects

(a) *Volume of production and consumption in individual countries and volume and pattern of trade between countries.*

Processed cheese is widely manufactured and traded. It may be manufactured from domestic or imported cheese; and the processed cheese may be consumed domestically or exported. The volumes of production and consumption and the market volume by country are indicated in the following tables:

Table 1. Production of processed cheese in European countries

Number of countries	Year	Production (tons)
15 ¹	2010	668,681 (est)

Source: Assifonte Report 2010

Table 2. Per capita consumption of processed cheese, top 10 countries reported in 2010

Country	Per capita consumption (kg)	
	2003	2010
Hungary	1.60	2.83
Saudi Arabia	2.31	2.78
Morocco	1.99	2.59
Egypt	1.99	2.46
Canada	2.32	2.12
France	1.74	1.75
Uruguay	1.19	1.53
Australia	1.21	1.45
Spain	1.13	1.34
United States	0.86	1.32

Source: datamonitor 2011

Table 3. Processed cheese market volume, top 10 countries reported

Country	Market volume (tons)	
	2003	2010
United States	248,400	407,100
Russia	101,000	146,300
Japan	102,000	130,900
France	107,900	113,400
Germany	91,600	98,000
Canada	74,800	72,700
Spain	47,300	61,100
Ukraine	25,600	55,100
Argentina	35,600	49,500
Poland	28,600	46,800
Total of 10	862,800	1,180,900

Source: datamonitor 2011

¹ Austria, Belgium, Czech Republic, Denmark, Finland, France, Germany, Ireland, Italy, Netherlands, Poland, Slovakia, Spain, Sweden, United Kingdom.

(b) Diversification of national legislations and apparent resultant or potential impediments to international trade.

The electronic working group on Processed Cheese notes that 27 countries reported the existence of a national standard for processed cheese. The scope of such national standards varied significantly. Some countries had detailed and specific standards covering processed cheese and other types of processed cheese products and a number of these countries reported that their standards were broadly aligned with the revoked *Codex Standard for Processed Cheese and Spreadable Processed Cheese*. Other countries had only a product definition. One country reported that its standard was voluntary; four countries had no standard.

Responses to CL 2012/24-CAC indicated that the absence of an international standard for processed cheese might result in restrictions or prohibitions for certain products due to the use of different criteria regarding quality and safety and the lack of a uniform classification of these products. They also pointed out that lack of an international standard might lead to the proliferation of standards (national and voluntary) and thus lead to inequality in international trade.

The report of the CCMMP questionnaire on processed cheese (CX/MMP 10/9/4) indicated that national legislation for processed cheese varies in requirements for labelling format, permission for the use of gelatine, starch and stabilizers, the content of fat and dry matter, and the expression of fat content.

(c) International or regional market potential.

There is already a substantial international market in processed cheese. The trade data indicate that market volume has increased between 2003 and 2010 and per capita consumption has generally increased. An international standard is likely to facilitate development of the market and fair trade between countries provided it does not create impediments to trade.

(d) Amenability of the commodity to standardisation.

The Commission's working group on processed cheese found there was near unanimity with regard to the product characteristics and method of processing of processed cheese and countries did not see any issues with the current name. There was however a range of views on matters related to product composition and how the cheese content should be controlled and declared.

The standard would aim to accommodate these views. For instance it could include a general statement that cheese should be the main ingredient of the product. Such a solution, while not meeting the needs of those countries that are calling for inclusion of a specific level of cheese content, at least helps address some of their expectations and provides a basis for a more elaborate standard at the national level if this is indeed considered necessary. Such an approach also represents a de facto recognition of the diversity of products on the market and the wide market preferences.

(e) Coverage of the main consumer protection and trade issues by existing or proposed general standards.

The *General Standard for the Use of Dairy Terms* and the *General Standard for the Labelling of Prepackaged Foods* provide guidance on the naming and labelling of processed cheese. These would be referenced in the General standard for processed cheese, as well as other relevant standards for food additives, contaminants and hygiene. Specific labelling requirements for processed cheese and named-variety processed cheese would be added.

(f) Number of commodities which would need separate standards indicating whether raw, semi-processed or processed.

The proposal is for one general standard for processed cheese. The standard would include processed cheese intended for further processing, and may include provisions for named-variety processed cheese.

(g) Work already undertaken by other international organizations in this field and/or suggested by the relevant international intergovernmental body(ies).

No other international organizations have undertaken or are considering work on a standard for processed cheese.

5 Relevance to the Codex strategic objectives

The proposed work contributes to Objectives 1.1 and 1.2 of the Codex Strategic Plan 2014-2019.

Objective 1.1: Establish new and review existing Codex standards, based on priorities of the CAC.

As noted above, a new standard for processed cheese would replace and update revoked standards.

Objective 1.2: Proactively identify emerging issues and Member needs and, where appropriate, develop relevant food standards.

Member countries in several regions have indicated a need for an international standard for processed cheese.

6 Information on the relation between the proposal and other existing Codex documents

The standard for processed cheese would become part of the suite of Codex standards for milk products. It will relate particularly to the *General Standard for Cheese* and other cheese standards, and the *General Standard for the Use of Dairy Terms*. Relevant general texts will be referenced in the sections dealing with food additives, contaminants, hygiene and labelling.

7 Identification of any requirement for and availability of expert scientific advice

None identified.

8 Identification of any need for technical input to the standard from external bodies so that this can be planned for

Technical input will be needed to ensure the standard reflects current manufacturing practice and sound food technology. The International Dairy Federation will be an important source of technical input and expertise.

9 Proposed time-line for completion of the new work

The following timeline is proposed for the completion of the work, preferably for final adoption in 2016.

Timetable	Meeting	Progress
Late 2014-early 2015	First meeting of Physical Working group	Prepare first draft for consideration at step 3
June 2015	CAC	Step 5
Feb 2016	Second Meeting of Physical Working Group	Revise draft standard and advance to step 8
June 2016	CAC	Adopt at step 8