

codex alimentarius commission

FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD HEALTH
ORGANIZATION

JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel.: +39(06)57051 Telex: 625825-625853 FAO I E-mail: Codex@fao.org Facsimile: +39(06)5705.4593

Agenda Item 3

**CX/MMP 00/5
December 1999**

JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON MILK AND MILK PRODUCTS
Fourth Session
Wellington, New Zealand, 28 February – 3 March 2000

DRAFT STANDARD FOR UNRIPENED CHEESE INCLUDING FRESH CHEESE

**REVIEW OF COMMENTS AND REVISED DRAFT STANDARD FOR UNRIPENED CHEESE
INCLUDING FRESH CHEESE**

(Prepared by the International Dairy Federation)

Governments and interested international organizations are invited to comment on the attached draft standard for Unripened Cheese Including Fresh Cheese at Step 6. Comments should be sent to:

Ms Debra Tuifao,
Codex Committee on Milk and Milk Products
MAF Policy, Ministry of Agriculture and Forestry
P O Box 2526
Wellington, New Zealand
Fax: +64 4 4744206
e-mail: tuifaod@maf.govt.nz

with a copy to the Secretary, Codex Alimentarius Commission, FAO, Viale delle Terme di Caracalla, 00100 Rome, Italy **not later than 25 January 2000.**

The Draft Standard will be considered at Step 7 by the Committee at its 4th Session.

INTRODUCTION

At the 3rd session in May 1998, the Codex Committee on Milk and Milk Products (CCMMP) decided to return the Draft Standard for Unripened Cheese Including Fresh Cheese to Step 6 in order to incorporate provisions for Cream Cheese. The Committee agreed that the IDF should redraft the text and that it should be circulated for government comments prior to consideration at the Committee's next session (ALINORM 99/11, para. 79).

The redrafting has been carried out on the basis of the Draft Standard tabled at the 3rd session of the Committee (Annex to CL 1997/31-MMP) in light of the written comments submitted to it. The following principles have been applied:

1. The review has been done in light of written comments submitted¹. Each written comment received has been examined individually as well as in light of other comments made.

¹ CX/MMP 98/5-Add.2, CRD 18 and 19 tabled at the 3rd session of the CCMMP.

2. The review also includes recommendations for amendments, where appropriate, that are considered consequential from the decisions taken at the Session under Agenda item 4 (Draft Code of Principles concerning Milk and Milk Products)², item 5 (Common Labelling Provisions of Milk Product Standards)³ and item 6 (Draft and Draft Revised Standards at Step 7)⁴ and item 9 (Methods of Analysis and Sampling for Milk Products)⁵
3. The relevant decisions taken by the 23rd Session of the Codex Alimentarius Commission in accordance with the recommendations of the 27th session of the Codex Committee on Food Labelling (CCFL) and the 31st session of the Codex Committee on Food Additives and Contaminants (CCFAC) have been incorporated. Consequently, government comments related to these issues, which were submitted at an earlier stage, have not been reviewed.
4. The general approach used has been that a Government comment is accepted unless proper technological, scientific, editorial or similar arguments make it advisable not to follow it or to amend it.
5. Where Governments have expressed different views, possible solutions are provided with the aim of facilitating a decision. They take into account technical justification and/or existing commercial trading practices.

Abbreviations used in this document:

GSUDT: Draft General Standard for the Use of Dairy Terms (CODEX STAN 206-1999)

GSLPF: General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1-1985, Rev. 1-1991)

1. SCOPE

1.1 THIRD SENTENCE - SUBORDINATED STANDARDS

The 3rd CCMMP agreed on an additional phrasing to the last sentence which was included in standard A-6, however, qualify the standards referred to by inserting the word “Codex”.

Recommendation no. 1:

The additional phrasing to the last sentence, as agreed by the 3rd session of the CCMMP for A-6 should be added, however, with the inclusion of the word “Codex”.

2. DESCRIPTION

2.1 UNRIPENED CHEESES INCLUDING FRESH CHEESES

Comments submitted:

New Zealand referred to the fact that some whey protein cheeses (such as Ricotta) are regarded as unripened cheese, wherefore the definition should be extended accordingly.

Discussion:

Like Whey Cheese, Whey Protein Cheese is a product that falls outside the definition of cheese in Standard A6. It differs primarily from cheese with respect to the whey protein to casein ratio of the end product due to the partly or exclusively use of whey, although it is manufactured by similar technologies.

Unripened cheese is defined by standard A-6 as a “cheese”, that is, has a whey protein to casein ratio not exceeding that of milk. Extension of the definition of unripened cheese to include whey protein cheese will therefore have consequences for standard A-6. Further, whey protein cheeses can also be manufactured as a ripened product.

² ALINORM 99/11, paras 7-20 and Appendix II.

³ ALINORM 99/11, paras. 21-29 and Appendix III.

⁴ ALINORM 99/11, paras. 30-79 and Appendices IV-XI.

⁵ ALINORM 99/11, paras. 89-91 and Appendix XII.

Recommendation no. 2:

The definition of unripened cheese should be retained, and possibilities for the legal recognition of whey protein cheeses should be further considered. The IDF has initiated such consideration.

2.2 CREAM CHEESE

Comments submitted:

Spain reiterated an earlier comment that, as Cream Cheese is an individual variety cheese, it should continue to be regulated by an individual cheese standard, in particular due to concern with the list of permitted ingredients (section 3.2) and the additives list (section 4), which are broader than the lists in the former standard C-31 for Cream Cheese.

Some countries (**India, Norway and United Kingdom**) and **the IDF** submitted comments on the restriction of Cream Cheese to products manufactured from cow's milk. The restriction was questioned or requested to be deleted.

Discussion:

Retention of a separate standard for Cream Cheese

The 3rd CCMMP decided that the Draft Standard for Unripened Cheese should be redrafted in order to incorporate provisions for cream cheese (ALINORM 99/11, para. 79). If the Committee should decide otherwise at its next session, the reestablishment of a separate standard should be drafted with the objective to use the accelerated procedure.

Origin of milk

Cream Cheese is an individual variety that actually covers a relatively wide range of products. A major part of the products traded are flavoured products. Restriction to cow's milk is therefore not justified in this case. As a consequence, the phrase "made from cow's milk only" should be deleted. The general labelling principle, as specified in the revised GSUDT (Section 4.1.2), applies.

Recommendation no. 3:

Taking into account the above comments and discussion, the following amended description of Cream Cheese is recommended:

"Cream Cheese is a soft, spreadable, unripened and rindless cheese which has a white to light cream colour with no holes. The texture is smooth to slightly flaky, and the cheese spreads and mixes readily with other foods."

3.2 PERMITTED INGREDIENTS

3.2.1 Starter cultures

Comments submitted:

France pointed out a translation error in the French version of the Draft Standard.

Recommendation no. 4:

The French version should be verified.

3.2.2 Enzymes

Comments submitted:

The United Kingdom requested to add the following indent: "Safe and suitable enzymes [to assist in flavour development]", pointing out that they preferred the text in square brackets deleted.

Discussion:

The 3rd CCMMP agreed on a text as requested above for standard A-6. However, it is noted that the use of ripening enzymes is not justified for the manufacture of unripened cheese and such practice would be misleading to the consumer with regard to the nature (unripenedness) of the product.

Recommendation no. 5:

Retain the current wording of the second indent.

3.2.3 Gelatine and starch

Comments submitted:

France requested the deletion of gelatine and starch, because (i) they are not allowed for cheese (A-6) and (ii) the use results in the production of different products which are close to cheese and which may be perceived by consumers as belonging to this product family.

Germany and Spain recommended the deletion of the phrase “and/or in combination with stabilizers/thickeners listed in section 4”, as the phrase has no meaning when the stabilizers/thickeners in section 4 are permitted according to Limited by GMP.

The United Kingdom requested the maximum limit for starch raised to 2% (equals 20 g/kg).

Discussion:

It should be noted that the technological functions of starches and gelatine are similar to the function of the other stabilizers/thickeners permitted by the Draft Standard. As long as stabilizers/thickeners are permitted there are no reasons not to permit the use of gelatine and starches.

The use of these substances is restricted to the amount needed for functionality. This principle is regulated by the definition of “milk products” (section 2.2 of the GSUDT).

The definition emphasizes that milk products may contain ingredients functionally necessary for the processing. The addition of starches and gelatine in excess of what is functionally necessary is to be regarded as a replacement of milk constituents. There are two possibilities for stressing this fact in the standard:

- either to limit the use to a certain maximum, e.g. a limit of 5 g/kg as already specified with the understanding that, in the case of cheese, the addition in excess of this limit cannot be justified according to functionality,
- or to stress that these substances may only be used to the extent they are functionally needed for stabilizing purposes, taking into account any use of the stabilizers/thickeners listed in section 4.

The second option is considered to be more in line with the approach to additive provisions and is, in fact, stricter than the first option, because, in certain cases, the addition of 5 g/kg is more than sufficient to meet the functional needs.

The request to delete the phrase “and/or in combination with stabilizers/thickeners listed in section 4” has some merit.

It should be noted that gelatine and starch are not permitted by the general standard for cheese (A-6). Consequently, an inclusion of these substances in A-19 is a deviation, which needs to be taken into account in the text.

Recommendation no. 6:

Amend the indent relating to gelatine and starches as follows:

“- *Gelatine and starches: Notwithstanding the provisions in the Standard for Cheese (A-6) these substances can be used in the same function as stabilizers, provided they are added only in amounts functionally necessary as governed by Good Manufacturing Practice taking into account any use of the stabilizers/thickeners listed in section 4.*”

3.2.4 Vinegar

Comments submitted:

Canada questioned the need for listing vinegar in section 3.2 as acetic acid glacial (INS 260) is already listed in the additive list.

Discussion:

The additives listed in section 4 should comply with the specifications for food additives with regard to identity and purity as prepared by JECFA. According to the specifications for INS 260 (Compendium of Food Additives Specifications, Vol. 1, FAO Food and Nutrition Paper 52/1), the additive shall contain not less than 99.0% of chemically pure acetic acid and should meet the requirements for purity tests.

Vinegar cannot meet these requirements and would not be allowed unless specifically mentioned in section 3.2 of the Standard.

Recommendation no. 7:

Retain vinegar as a permitted ingredient.

3.2.5 Ingredients with anti-caking functions

Comments submitted:

The United States requested the addition of rice, corn, and potato flour to the list of ingredients as these substances are used as anti-caking agents.

Discussion:

The function is similar to anti-caking agents. Wheat flour is also currently used and should be added to the list provided by the US.

Recommendation no. 8:

Add the following new indent to the list of permitted ingredients:

“- Rice, corn, wheat and potato flours and starches: Notwithstanding the provisions in the Standard for Cheese (A-6), these substances can be used in the same function as anti-caking agents for treatment of the surface of cut, sliced, and shredded products only, provided they are added only in amounts functionally necessary as governed by Good Manufacturing Practice, taking into account any use of the anti-caking agents listed in section 4.”

3.3 COMPOSITION

Comments submitted:

The United States requested deletion of the section in its entirety.

Spain also requested deletion, as an individual standard should regulate the composition of Cream Cheese for Cream Cheese (C-31).

Argentina stated that compositional requirements should be defined for unripened cheeses in general as has been done for Cream Cheese. These cheeses are characterized by their high moisture content and can have variable fat contents.

Discussion:

The adoption of the new wording concerning compositional modified milk products (section 4.3.3 of the GSUDT) provides a new framework for provisions in individual milk product standards with respect to modified products (which are products having a composition beyond the reference level(s)).

The new provision states that compositional modified products may be named as specified in a milk product standard if the following three conditions are met:

1. It is named with a clear description of the modification made in association with the name of the reference product
2. The essential product characteristics are maintained
3. The limits of such compositional modifications are detailed in the standards concerned, as appropriate.

If the limitations for compositional modifications are not detailed in the standards, such modifications are not allowed. For this purpose, the following should be noted:

- The standard needs to address modifications, as appropriate.
- One can only use the term modification, if a reference product exists which can identify when a modification has taken place. For components, where reference levels are specified, a wording addressing modifications will always be necessary.
- For components, where no compositional criteria have been established, the restrictions deriving from the definition of cheese apply.

Milk fat content

It is questionable whether the name Cream Cheese can be used for products not containing any milkfat (e.g. “non-fat cream cheese”). According to section 4.3.3 of the GSUDT, it is a prerequisite for modifying the fat content beyond the reference level (60% fat in dry matter) that the essential characteristics are maintained. The name Cream Cheese indicates that one of the essential characteristics is that the cheese has been made from “cream”. Consequently, it is indirectly required by the GSUDT to specify an absolute minimum fat content for Cream Cheese.

Such an absolute minimum could be specified as 40 % FDM, which would allow for the use of the nutritional claim “reduced fat content”/“light” for this product (a 25% reduction of the reference fat content results in 45% fat in dry matter). However, it is considered appropriate that it is left to the CCMMP to decide which absolute minimum fat content is appropriate for Cream Cheese.

Milk protein and lactose contents

The definition and compositional criteria for “Cheese” will be addressed by a separate document that will be submitted by the IDF late 1999. This document will recommend a revised definition of cheese that will provide an indirect limit for the protein and lactose contents. If endorsed by the CCMMP, the revised general definition of cheese would provide sufficient guidance with regard to the protein and lactose levels in unripened cheeses.

Whey protein/casein ratio

The definition for “Cheese” specifies a maximum limit for the whey protein to casein ratio (that of the milk used). Therefore, there is no need to further describe the framework for the protein composition.

Conclusion

In order to follow the intent of section 4.3.3 of the GSUDT, criteria for cream cheese addressing the compositional framework with regard to fat, moisture on fat free basis and dry matter contents within which compositional modifications can take place should be established.

Recommendation no. 9:

Pending the endorsement of a revised definition of cheese as recommended by the IDF late 1999, the following provision is recommended to constitute section 3.3 of the standard:

“Specific criteria for Cream Cheese:

	<u>Minimum:</u>	<u>Maximum:</u>	<u>Reference level:</u>
<i>Milk fat:</i>	<i>[40]% m/m in dry matter</i>	<i>-</i>	<i>60% m/m in dry matter</i>
<i>Moisture on fat free basis:</i>	<i>above 67% m/m</i>	<i>-</i>	<i>Not specified</i>
<i>Dry matter:</i>	<i>[35]% m/m</i>	<i>Restricted by the MMFB</i>	<i>Not specified</i>

Compositional modifications of Cream Cheese beyond the minima or maxima specified above for milkfat, moisture on fat free basis and dry matter are not considered to be in compliance with section 4.3.3 of the General Standard for the Use of Dairy Terms”.

Note: The CCMMP should decide whether to retain or amend the absolute minimum fat content (in dry matter) embraced by square brackets. If amended, the minimum dry matter content needs to be changed accordingly.

(3.4) OTHER CHARACTERISTICS

Comments submitted:

United Kingdom agreed with the first half of Recommendation no. 17 in CL 1997/31-MMP (which recommended that provisions on heat treatment of milk, heat treatment of coagulum and storage should not be retained), and found it unacceptable to retain any provisions that would imply mandatory pasteurization, as this would be contradictory to the view of the Codex Committee on Food Hygiene (CCFH).

France agreed with the deletion of provisions concerning heat treatment, but requested that the para. on storage at refrigerated temperature unless the product has been heat treated after fermentation and aseptically packed should be transferred to the Annex (to be established).

Discussion:

The UK viewpoint should be adopted. The French request concerning storage requirements are also covered by the Code of Hygienic Practice for Milk and Milk Products currently being developed by the CCFH.

Recommendation no. 10:

There is no need to include any provisions under “other characteristics”. Further, there is no need to include advice on storage conditions in the Annex. (See also **Recommendation no. 29**)

4 FOOD ADDITIVES

4.1 GENERAL APPROACH TO ADDITIVES

According to the Draft General Standard for Food Additives, additives with an ADI not specified should be allowed to foods in general according to GMP. However, stricter lists applying to specific commodities can supersede this general approach. In particular, restrictions are justified where no technological justification for their use is available.

Recommendation no. 11:

For the purpose of this review, the following principles apply:

- All requests for additives with [no numerical ADI specified] should be included, provided it’s functional class has already been inserted in the Draft Standard,
- Insertion of additional functional classes shall be technologically justified (class by class).
- Additives with numerical ADIs shall be justified individually as to whether they should be permitted and, if so, at which maximum level.

4.2 PROCESSING AIDS

Comments submitted:

Spain, Denmark and the UK submitted comments on processing aids.

Canada suggested the addition of INS 941 Nitrogen to the list of processing aids at GMP level.

Discussion:

The 3rd session of the CCMMP decided not address processing aids in the standards and recommended that there should be clearer guidance for Codex Committees in relation to the need to include provisions for processing aids in standards (ALINORM 99/11, para. 46).

For the time being, and pending further guidance with regard to the handling of processing aids, reference to these substances should not be included in standards.

Nitrogen should be retained in the list under foaming agents for whipped products. When used for foaming purposes, nitrogen is not a processing aid. When used as a packaging gas, it is.

Recommendation no. 12:

Remove processing aids from section 4 of the standard as a consequence of the decision of the 3rd CCMMP

Recommendation no. 13:

Retain INS 941 Nitrogen as foaming agents for whipped products.

4.3 ACIDS

Comments submitted:

Poland informed that acids are not allowed by Polish national legislation.

Canada requested the addition of a number of additional additives as follows:

170(i)	Calcium carbonate	GMP
296	Malic acid	GMP
334	Tartaric acid	GMP for the acid only, not more than 4.0% total tartrate salts
500	Sodium bicarbonate	GMP
500(i)	Sodium carbonates	GMP
501(ii)	Potassium bicarbonate	GMP
501	Potassium carbonate	GMP

Canada further informed that INS 507 is not permitted in Canada for unripened cheeses.

Discussion:

INS 170(i) functions as an anticaking agent while INS 170 is an acidity regulator. Also INS 500 and 501 are acidity regulators and should be listed as such at GMP level. Magnesium carbonates (INS 504) are allowed for cheese in general as well.

Numerical ADI-values have been established for INS 334, wherefore a specific technological justification is needed. A maximum of 2 g/kg is considered sufficient for the purpose of regulating the acidity; if added in excess of this limit tartaric acid functions as a sequestrant (melting salt) the functional class of which is not technologically justified.

Recommendation no. 14:

Add the following acids to the list:

296	Malic acid	Limited by GMP
-----	------------	----------------

Add the following acidity regulators to the list:

170	Calcium carbonates	Limited by GMP
[334	Tartaric acid (L(+)-)	max. 2 g/kg, singly or combined with permitted tartaric acid salts]*
500	Sodium bicarbonate	Limited by GMP
500(i)	Sodium carbonates	Limited by GMP
501(ii)	Potassium bicarbonate	Limited by GMP
501	Potassium carbonate	Limited by GMP

*) Inclusion recommended at max. 2g/kg, pending technological justification from the CCMMP delegation of Canada.

Add the following anticaking agents to the list for cut, sliced, grated and shredded products:

170(i)	Calcium carbonate	Limited by GMP
--------	-------------------	----------------

4.4 ACIDITY REGULATORS (SEE ALSO 4.3 ABOVE)

Comments submitted:

Canada informed that INS 575 is not permitted in Canada for unripened cheeses.

Recommendation no. 15:

Retain GDL as an acidity regulator. It is widespread used and permitted in a number of countries.

4.5 STABILIZERS/THICKENERS

Comments submitted:

Germany and United Kingdom requested the addition of INS 417 Tara gum. It has a function between Guar gum and Carob gum.

France requested that stabilizers and thickeners be restricted to composite products.

United Kingdom informed that INS 405 and 416 are not permitted in the EU and **Poland** informed that only INS 406, 407, 410, 412 and 415 are allowed as stabilizers/thickeners in Polish national legislation, and only to heat treated products.

Argentina requested a maximum limit to be specified for the group of stabilizers/thickeners, despite the fact that numerical ADI-values have not been specified for most of these substances. Argentina argues that the objective of such a restriction is to avoid their use to replace milk ingredients and to ensure the genuineness of the products. A maximum of 5 g/kg alone or in combination was suggested.

Canada suggested a number of stabilizers/thickeners added to the list, as follows:

333	Calcium citrate	4.0%
332	Potassium citrate	3.5%
331	Sodium citrate	3.5%
335	Sodium tartrate	GMP for the acid only, not more than 4.0% total phosphate, citrate, gluconate and tartrate salts
337	Sodium potassium tartrate	GMP for the acid only, not more than 4.0% total phosphate, citrate, gluconate and tartrate salts
339	Sodium phosphate, dibasic	3.5% of total phosphate salts
340	Potassium Phosphate, dibasic	3.5% of total phosphate salts
341(i)	Calcium Phosphate, dibasic	3.5% of total phosphate salts
450i	Sodium acid pyrophosphate	3.5% of total phosphate salts
450ii	Sodium pyrophosphate tetrabasic	3.5% of total phosphate salts
	Sodium hexametaphosphate	3.5% of total phosphate salts
541	Sodium aluminium phosphate	3.5% of total phosphate salts
576	Sodium gluconate	4.0% total phosphate, citrate, gluconate and tartrate salts

Canada further informed that INS 400-404, 416, 440, and 460 are not permitted in Canada for unripened cheeses.

Discussion:

Citrates, tartrates and phosphates may function in cheese either as stabilizers/thickeners or as sequestrants (melting salts) depending on the amount added to the cheese. As Canada has requested these additives listed under the functional class of stabilizers/thickeners, the amounts needed are considerably less than indicated by Canada.

The ADI of “not limited” has been allocated for citrates, wherefore the additive can be added according to GMP as a stabilizer.

A numerical ADI value has been allocated to tartrates, however a specific technological justification is lacking. A maximum of 2 g/kg of tartrates is sufficient for functionality as stabilizer.

A numerical ADI value has been allocated to phosphates, however specific technological justification are available. A maximum of 3.5 g/kg of phosphates is sufficient for functionality as stabilizer.

No numerical ADI value has been allocated to sodium gluconate, wherefore is should be permitted as at GMP level as a stabilizer. Amounts of 40 g/kg as requested by Canada will make gluconate function as a sequestrant.

With regard to the concerns expressed on the risk of misleading consumers and to ensure adherence to the definition of “milk product”, a similar approach as has been recommended for starch and gelatine (**Recommendation no. 6**) could assist in achieving full transparency with respect to the use at GMP level of these additives.

Recommendation no. 16:

Add the following introductory text:

“Stabilizers and thickeners including modified starches may be used in compliance with the definition for milk products and only to the extent they are functionally necessary taking into account any use of gelatine and starch as provided for in section 3.2.”

Recommendation no. 17:

Add the following additives to the list of stabilizers/thickeners

331	Sodium citrates	Limited by GMP
332	Potassium citrates	
333	Calcium citrates	
[335	Sodium tartrates	Max 2 g/kg of tartrates, singly, combined or combined with tartaric acid]*
337	Sodium potassium tartrate	

339	Sodium phosphates	Max. 3.5 g/kg, singly or combined, expressed as P ₂ O ₅
340	Potassium Phosphates	
341	Calcium Phosphates	
450(i)	Disodium diphosphate	
450(ii)	Trisodium diphosphate	
541	Sodium aluminium phosphate	
576	Sodium gluconate	Limited by GMP
417	Tara gum	Limited by GMP

*) Inclusion recommended at max. 2g/kg, pending technological justification from the CCMMP delegation of Canada.

4.6 MODIFIED STARCHES

Comments submitted:

France requested that modified starches be restricted to composite products.

United Kingdom noted that the EU classifies INS 1400, 1401, 1402, 1403, 1405, 1421 and 1423 as permitted food ingredients (not additives), while **Canada** informed, that none of the modified starches listed (INS 1400-1405, 1410, 1412-1414, 1420-1423, 1440, 1442 and 1450) are permitted in Canada for unripened cheeses.

Discussion:

Modified starches are classified as thickeners and the list should editorially be formatted as a subgroup under stabilizers/thickeners.

All of those substances listed, except INS 1423, have an ADI “Not specified”. However, to INS 1423 no ADI has been allocated. Other thickeners are permitted by the draft standard.

The introductory statement suggested above (Recommendation no. 16) may resolve the concerns of France.

Recommendation no. 18:

Format the list of modified starches as a sub-group under stabilizers/thickeners.

4.7 EMULSIFIERS

Comments submitted:

France requested that emulsifiers be restricted to composite products.

Canada informed that the emulsifiers listed (INS 322 and 471) are not permitted in Canada for unripened cheeses.

Recommendation no. 19:

Remove the list of emulsifiers.

4.8 COLOURS

Comments submitted:

France requested that colours are restricted to composite products and **Spain** expressed concerns with the extensive list of colours.

United Kingdom informed that INS 100, 101, 160a, c and e, and 162 are not permitted for unripened cheeses in the EU. The list of colours should be restricted to colours that are added to obtain a uniform colour (due to feeding patterns and seasonal variation). **Canada** informed that INS 100, 120, 141 and 162 are not permitted in Canada for unripened cheeses.

Germany requested the deletion of INS 160b.

Canada requested the addition of INS 100 (ii) (Turmeric) at GMP level and INS 160f (Beta-apo-8'-Carotenoic Acid, ethyl ester) at a maximum of 35 ppm, and **New Zealand and the United States** requested the addition of INS 171 (Titanium dioxide) at GMP level and at maximum 10 g/kg, respectively.

New Zealand further requested the addition of INS 928 (Benzoyl peroxide) at maximum 1 g/kg of milk as a bleaching agent.

India requested the deletion of INS 140 and 141 because (i) the justification provided (mask brownishing due to Maillard reaction) is not relevant for unripened cheeses due to storage at low temperatures and (ii) the use is considered misleading with respect to the true nature of the products.

Discussion:

As the draft standard does not regulate composite products, only those colours justified for plain products can be included. This restricts the list of colours to those aiming at achieving a uniform natural colour throughout the year and independent from feeding practices.

Maillard reaction is not related to storage temperatures but to extensive heat treatment of milk, coagulum, etc.

It is advisable to adjust the requests for additional additives to the list adopted for standard A-6 (cheese), and it should be noted that the 31st session of the CCFAC did not endorse INS 928 as it noted that this substance was evaluated as flour treatment agent only and agreed that the use as bleaching agent in cheese would have to be evaluated by JECFA.

Recommendation no. 20:

Retain permission to use INS 100, 101, 141, 160a,b,c,e and 162, however, adjusted to the list in standard A-6

Retain INS 140 as currently listed. Delete INS 120 (carmines). Add INS 160f and 171 with same limitations as for A-6 (cheese).

4.9 PRESERVATIVES

Comments submitted:

Germany and Spain requested the deletion of INS 280-283. **United Kingdom** informed that these are not permitted in the EU. **Canada** informed that INS 283 is not permitted in Canada for unripened cheeses.

Canada requested the inclusion INS 251-252 (Potassium and sodium nitrate) with a residue level in cheese of maximum 50 ppm. **United Kingdom** noted that INS 251 and 252 are only allowed at a maximum of 50 mg/kg in hard, semi-hard and semi-soft cheeses (i.e. not in extra hard and soft cheeses).

Canada further requested the inclusion of INS 201 (sodium sorbate). **Spain** requested deletion of INS 201 from the list of preservatives to cut, sliced and shredded products, as this additives is not allowed for cheese in general (standard A-6). **Poland** informed that only INS 202 was the only preservative allowed in Polish national legislation.

Canada also requested the insertion of INS 235 (Pimaricin) for surface treatment of cheese with the maximum limit of 20 ppm, calculated on weight of cheese.

Discussion:

Nitrates are not technological justified for unripened cheeses. Instead Nisin is used. Propionates are attractive alternatives to sorbates. It should be noted that propionates have the ADI “not limited”. This is not the case for sorbates. It is therefore in the interest of public health protecting to promote these alternatives to sorbates.

With regard to pimaricin, it is advisable to use the same specifications as in A-6 (i.e. for surface/rind treatment). It should be noted that unripened cheese is manufactured with rind formation in some countries.

Recommendation no. 21:

Retain provisions for propionates and sorbates. Insert INS 234 (nisin) at a maximum level of 12.5 mg/kg. Add pimaricin for surface treatment only with a maximum limit as for cheese in general (max. 2 mg/dm² of surface; not present in a depth of 5 mm).

4.10 FOAMING AGENTS

Recommendation no. 22:

As other gasses are used as foaming agents (e.g. such as carbon dioxide) INS 290 should be added as foaming agents for whipped products.

4.11 ANTICAKING AGENTS FOR CUT, SLICED, GRATED AND SHREDDED PRODUCTS, ONLY (SEE ALSO 4.3))

Comments submitted:

United States requested the increase of the maximum limit from 10 g/kg to 20 g/kg singly or in combination

United Kingdom noted that INS 460 is permitted at Limited by GMP level in the EU and that INS 551-553, 555, 556 and 559 were only permitted by the EU for sliced hard cheese.

Discussion:

The 3rd CCMMP adopted a list of anticaking agents permitted for surface treatment of cut, sliced, grated and shredded cheese in general. Unripened cheeses do not differ substantially from ripened cheese in this respect, wherefore the maximum limit of 10 g/kg as specified for cheese in general is sufficient for this standard as well.

Recommendation no. 23:

Adjust the list of anticaking agents to the list adopted for cheese in general (A-6).

4.12 PRESERVATIVES FOR CUT, SLICED, GRATED AND SHREDDED PRODUCTS, ONLY

Comments submitted:

United States and Canada requested the insertion of INS 235 (Pimaricin). **Canada** requested it restricted to surface treatment of grated or shredded cheese with the maximum limit of 10 ppm, calculated on weight of cheese, while **the US** requested a higher limit of 300 ppm and that it as well can be added during the kneading and stretching process.

Spain requested the deletion of preservatives for cut, sliced, grated and shredded products.

Discussion:

The 3rd CCMMP debated in detail a similar request to allow pimaricin to sliced, cut, grated and shredded products.

The matter was referred to the CCFAC, although the Committee felt that the substance should not be in the food as consumed. The 31st session of the CCFAC did not endorse the use, pending technological justification from Canada.

Recommendation no. 24:

INS 201 (sodium sorbate) should be deleted.

7. LABELLING

7.1 NAME OF THE FOOD

Comments submitted:

Denmark and the IDF expressed concern with the use of the so-called “standard wording” in all cases as it would make it mandatory to use the designations regulated by Codex. A proposed new text was provided by the IDF.

The Netherlands stated that, in the Netherlands, “cream cheese (in Dutch: “Roomkaas”) is a ripened cheese. In their opinion, the term “cream” refers in the first place to a high content of milkfat. It is suggested that a provision is included in the Standard that states that cream cheese can also be a ripened cheese.

France commented that the term “fresh cheese” is not suitable for hard and extra hard cheeses and should be restricted to products, which are sufficiently rich in water (an MFFB% of at least 57%). The

phrase “or fresh cheese” should be deleted from 7.1.2 and replaced with the following: “The designation “fresh cheese” may be awarded to a product whose MFFB is equal to or in excess of 57%”

Czech Republic stated that the term “fresh cheese” should be allowed only for products without heat treatment of coagulum or curd.

Canada agreed with the text in section 7.1 as drafted.

Discussion:

Consequential amendments

The text in the first sentence should be aligned with the text adopted for cheese (A-6), whey cheese (A-7) and Cheeses in Brine (A-17) by the 3rd CCMMP (ALINORM 99/11, para. 27, last indent). This amendment meets the concerns expressed by Denmark and the IDF.

The Dutch problem

Apparently, the problem raised is related to a cheese type which is only sold locally (domestic market of the Netherlands). The common situation worldwide is that cream cheese is an unripened cheese variety. The Dutch situation involves two difficulties. Firstly, the continuation of the present situation so that the Dutch variety “Roomkaas” can continue to be sold under that name and secondly, the name to be used on the Dutch market for the product “cream cheese” defined by the Standard A-19.

With regard to the first difficulty, it would be in accordance with the TBT Agreement to retain the present situation in the Netherlands, as the long established practice would suffice as a legitimate objective to deviate from the Codex standard in this respect. It should be noted, however, that if “Roomkaas” is traded internationally with a designation that is directly translated into other languages, the fact that the cheese is a ripened cheese will have to be stated in close proximity to the name. See also the discussion on the reservation of the name “cream cheese” below.

With regard to the second difficulty, there is a need to find another Dutch designation for the cream cheese defined by Standard A-19 in order not to confuse the Dutch consumer with regard to the true nature of product and to ensure correct consumer information.

Further, the Dutch problem may not be unique. Direct translation from English, French or Spanish into other languages of the designations specified in the Standard (as may be required by Section 8.2.2 of the GSLPF) can result in misleading or misinforming the consumer, also with regard to other names and terms regulated by Standard A-19. In most cases, the name of an individual variety cannot and should not be subject to translation. For instance, the name Cheddar is unique and should be used worldwide. In a few cases, national practices have been to translate the internationally defined name (cream cheese and cottage cheese).

Section 8.1.2 of the GSLPF specifies that labelling statements shall be clear. This is understood to include that the name of the food shall also be understandable to the consumer to whom the food is intended and not be misleading. A direct translation word for word from the official Codex languages (English, French, and Spanish) into other languages will in certain situations result in terms and phrases which are not clear to the consumer and may be directly misleading and, consequently, be in conflict with the general principles of the GSLPF (Section 3).

It is therefore recommended that the wording permit the use of local names to replace the name specified in the standard.

A new wording should allow the use of alternate names defined in the country where the cheese is manufactured and/or sold, however, the general principle of not creating an erroneous impression with regard to the nature of the product should be respected. Obviously, this principle refers to the presentation to the end-consumer, that is, in the country of the retail sale. By specifying this principle, potential trade disputes are avoided. For instance, in the case where the consumer perception of a particular name differs between the manufacturing country and the country of retail sale, then it is the situation in the country of retail sale that governs the correct choice of designation. Where such problems do not exist, then the designation used in the country of origin can apply.

The term “fresh cheese”

Reference to the term “fresh cheese” is made in three of the paragraphs under 7.1 (1st and 2nd para. as well as in 7.1.2). If the French and Czech proposals are followed it would be necessary to compile the regulation of the use of the term in a separate paragraph.

The Czech proposal aims at restricting the use of the term to products which contain viable and abundant starter culture micro-organisms, and is apparently based upon the assumption that these products are only manufactured by the use of microbiological fermentation. However, acidified cheeses (e.g. Cottage Cheese) are considered as a fresh cheese in many countries.

The French proposal limits the use of the term to cheeses with a certain content of moisture on a fat-free basis. The selection of a particular figure can hardly be justified. It may therefore be more appropriate just to state the general principle that the term may be used provided it is not misleading to the consumer.

Recommendation no. 25:

Endorse the following text to replace the present text in section 7.1:

“The name of the food shall be unripened cheese or cream cheese, as appropriate. However, these names may be replaced by other variety names, provided that the product complies with the specific provisions of this Standard. Such designations include names which are specified in the national legislation of the country in which the product is manufactured and/or sold, or names existing by common usage, provided that such designations do not create an erroneous impression in the country of retail sale regarding the character and identity of the food.”

The words “unripened cheese” may be omitted in the designation of an individual cheese variety reserved by a Codex standard for individual unripened cheeses.

In case the product is not designated by an alternative or a variety name, but with the singular designation “unripened cheese”, the designation may be accompanied by a descriptive term such as provided for in Section 7.1.1 of Standard A-6.

Unripened cheese may alternatively be designated “fresh cheese” provided it is not misleading to the consumer in the country of retail sale.”

7.3 INGREDIENTS LISTING

Comments submitted:

United States suggested inserting the following text: “Rennet or other safe and suitable coagulating enzymes of animal, plant, or microbial origin may be declared as enzymes in the list of ingredients”.

Discussion:

The US proposal is not in compliance with the GSLPF (section 4.2). If insertion is agreed, it needs to be endorsed by the CCFL. However, it is recommended that the text refer to “coagulating enzymes” rather than just “enzymes”. The proposal may have horizontal consequences for other foods as well and the CCMMP should therefore consider recommending a class name for coagulating enzymes to be added to section 4.2.2.1 of the GSLPF.

Recommendation no 26:

Consider the insertion of the text suggested by the US, however modified as follows:

“Rennet or other safe and suitable coagulating enzymes of animal, plant, or microbial origin may be declared as coagulating enzymes in the list of ingredients”

Alternatively, consider recommending to the CCFL that a class name be added to section 4.2.2.1 of the GSLPF as follows:

“The following class names may be used for the ingredients falling within these classes:

Coagulating enzymes: Rennet or other safe and suitable coagulating enzymes of animal, plant, or microbial origin.”

8. METHODS OF ANALYSIS AND SAMPLING

Methods of analysis and sampling will be considered under Agenda Item 6 (CX/MMP 00/16).

APPENDIX

Comments submitted:

France submitted a proposal for information on usual fresh cheese manufacturing diagrams as follows:

1. Characteristics of appearance
 - 1.1 *Size and weight: Sold in containers of variable capacity*
 - 1.2 *Rind: none*
 - 1.3 *Flavour: mild, creamy or acidic with the typical flavour of a milk products cultured with lactic acid and flavour producing bacteria.*
2. Production method
 - 2.1 *Coagulation: Via the action of lactic bacteria, rennet or other suitable coagulating enzymes or combinations thereof.*
 - 2.2 *Fermentation process: should fermentation of milk ingredients be carried out, lactic acid-producing bacteria generally achieve this.*
 - 2.3 *Storage: unripened cheese, including fresh cheese, shall be stored in a refrigerator unless it has been heat-treated after fermentation and aseptically packaged*

Discussion:

The term “fresh” has different meanings in different countries. The French proposal aims at providing an advisory standard for a particular type of “fresh cheese” as understood in some countries.

The issue of “fromage frais” (the French translation of “fresh cheese”) has been considered earlier (CL 1997/31-MMP, recommendations no. 2 and 8). An annex to standard A-19 has also been considered earlier (CL 1997/31-MMP, recommendations no. 39).

It should be stressed that, in many countries, the term “fresh cheese” is used for acidified soft unripened cheeses such as Cottage Cheese and heat coagulated unripened cheese such as Mascarpone.

Reference is also made to **Recommendation no. 10**, which states that there is no need to include any provisions under “other characteristics”.

With regard to the individual paragraphs suggested, the following should be noted:

- Para. 1.1: The provision does not add any value to the trade and is therefore redundant
- Para. 1.3: The provision does not take into account that some of the products are manufactured by the use of acidifiers (additives)
- Para. 2.1: The provision does not take into account that some of the products are manufactured by the use of acidifiers (additives). It also contradicts the text in 2.2, which indicates that fermentation may not always take place.
- Para. 2.3: There is no need to include advise on storage conditions in the Annex, as storage temperatures are covered by the Code of Hygienic Practice for Milk and Milk Products currently being developed by the CCFH.

Recommendation no. 27:

Taking into account the recommendations with regard to the use of the term “fresh cheese” in section 7.1 of the standard (**Recommendation no. 25**), the value of the Annex is limited and should not be adopted.

If the CCMMP decides otherwise, it is recommended that the text be substantially amended as follows:

APPENDIX: Information on usual patterns of manufacturing fresh cheese

This text is intended for voluntary application by commercial partners and not for application by governments.

1. Appearance characteristics
 - 1.1 *Rind: none*

1.3 *Flavour: mild, creamy or acidic*

2. *Manufacturing method*

2.1 *Coagulation: By the action of lactic bacteria, rennet and/or other suitable coagulating enzymes, by acidification, by other coagulation methods, or by combinations thereof.*

2.2 *Fermentation process: should fermentation of milk ingredients be carried out, lactic acid bacteria generally achieve this.*

2.3 *Storage: at refrigerated temperatures unless the product has been subject to heat-treatment in connection with the packaging and aseptically packaged”*

If the above is adopted, the standard text referring to an Appendix should be inserted as an introductory text to the Standard itself, as follows:

“The Appendix to this Standard contains provisions which are not intended to be applied within the meaning of the acceptance provisions of Section 4.A (i) (b) of the General Principles of the Codex Alimentarius”

(**Note:** See also discussion and recommendations with regard to Appendices in the review of Proposed Draft Revised Standards for Individual Cheeses (C-series) including the Proposed Draft Standard for Mozzarella.)

DRAFT GROUP STANDARD FOR UNRIPENED CHEESE INCLUDING FRESH CHEESE⁶

[The Appendix to this Standard contains provisions, which are not intended to be applied within the meaning of the acceptance provisions of Section 4.A (i) (b) of the General Principles of the Codex Alimentarius.]

1. SCOPE

This Standard applies to unripened cheese including fresh cheese, intended for direct consumption or further processing, in conformity with the description in Section 2 of this Standard. Subject to the provisions of this Standard, Codex Standards for individual varieties of unripened cheese may contain provisions, which are more specific than those in this Standard and in these cases; those specific provisions shall apply.

2. DESCRIPTION

Unripened cheeses including fresh cheeses are products in conformity with Standard A6, which are ready for consumption shortly after manufacture.

Cream Cheese is a soft, spreadable, unripened and rindless cheese that has a white to light cream colour with no holes. The texture is smooth to slightly flaky, and the cheese spreads and mixes readily with other foods.

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.1 RAW MATERIALS

Milk and/or products obtained from milk.

3.2 PERMITTED INGREDIENTS

- Starter cultures of harmless lactic acid and/ or flavour producing bacteria and cultures of other harmless micro-organisms;
- Rennet or other safe and suitable coagulating enzymes;
- Sodium chloride;
- Potable water;
- Gelatine and starches: Notwithstanding the provisions in the Standard for Cheese (A-6), these substances can be used in the same function as stabilizers, provided they are added only in amounts functionally necessary as governed by Good Manufacturing Practice taking into account any use of the stabilizers/thickeners listed in section 4;
- Vinegar;
- Rice, corn, wheat and potato flours and starches: Notwithstanding the provisions in the Standard for Cheese (A-6), these substances can be used in the same function as anti-caking agents for treatment of the surface of cut, sliced, and shredded products only, provided they are added only in amounts functionally necessary as governed by Good Manufacturing Practice taking into account any use of the anti-caking agents listed in section 4.

3.3 COMPOSITION

Specific criteria for Cream Cheese:

⁶ Comments are being requested at Step 6. This Draft will be considered by the CCMMP at its 4th Session at Step 7.

	Minimum:	Maximum:	Reference level:
Milk fat:	[40]% m/m in dry matter	-	60% m/m in dry matter
Moisture on fat free basis:	above 67% m/m	-	Not specified
Dry matter:	[35]% m/m	Restricted by the MMFB	Not specified

Compositional modifications of Cream Cheese beyond the minima or maxima specified above for milkfat, moisture on fat free basis and dry matter are not considered to be in compliance with section 4.3.3 of the General Standard for the Use of Dairy Terms.

4. FOOD ADDITIVES⁷

Only those food additives listed below may be used and only within the limits specified. Additives not listed below but provided for in individual Codex standards for varieties of Unripened Cheeses may also be used in similar types of cheese within the limits specified within those standards.

INS No.	Name of food additive	Maximum level
Acids		
260	Acetic acid glacial	Limited by GMP
270	Lactic acid (L-, D- and DL-)	Limited by GMP
296	Malic acid	Limited by GMP
330	Citric acid	Limited by GMP
338	Orthophosphoric acid	2 g/kg, expressed as P ₂ O ₅
507	Hydrochloric acid	Limited by GMP
Acidity regulators		
170	Calcium carbonates	Limited by GMP
[334	Tartaric acid (L(+)-)	max. 2 g/kg, singly or combined with permitted tartaric acid salts] ⁸
500	Sodium bicarbonate	Limited by GMP
500(i)	Sodium carbonates	Limited by GMP
501(ii)	Potassium bicarbonate	Limited by GMP
501	Potassium carbonate	Limited by GMP
575	Glucono delta-lactone (GDL)	Limited by GMP
Stabilizers/thickeners		
Stabilizers and thickeners including modified starches may be used in compliance with the definition for milk products and only to the extent they are functionally necessary taking into account any use of gelatine and starch as provided for in section 3.2.		
331	Sodium citrates	Limited by GMP
332	Potassium citrates	
333	Calcium citrates	
[335	Sodium tartrates	Max 4 g/kg of tartrates, singly, combined or combined with tartaric acid] ⁹
337	Sodium potassium tartrate	

⁷ Additive provisions are subject to endorsement by the Codex Committee on Food Additives and Contaminants and to incorporation in the General Standard for Food Additives.

⁸ Pending technological justification from the CCMMP delegation of Canada.

⁹ Pending technological justification from the CCMMP delegation of Canada.

339	Sodium phosphates	
340	Potassium Phosphates	
341	Calcium Phosphates	Max. 3.5 g/kg, singly or combined, expressed as
450(i)	Disodium diphosphate	P ₂ O ₅
450(ii)	Trisodium diphosphate	
541	Sodium aluminium phosphate	
400	Alginic acid	
401	Sodium alginate	
402	Potassium alginate	Limited by GMP
403	Ammonium alginate	
404	Calcium alginate	
405	Propylene glycol alginate	5 g/kg
406	Agar	
407	Carrageenan and its Na, K, NH ₄ salts (includes Furcelleran)	
410	Carob bean gum	
412	Guar gum	
413	Tragacanth gum	
415	Xanthan gum	Limited by GMP
416	Karaya gum	
417	Tara gum	
440	Pectins	
460	Cellulose	
466	Sodium carboxymethyl cellulose	
576	Sodium gluconate	
	<u>Modified starches as follows:</u>	
1400	Dextrins, roasted starch white and yellow	
1401	Acid-treated starch	
1402	Alkaline treated starch	
1403	Bleached starched	
1404	Oxidized starch	
1405	Starches, enzyme-treated	
1410	Monostarch phosphate	
1412	Distarch phosphate esterified with sodium trimetaphosphate; esterified with phosphorus- oxychloride	Limited by GMP
1413	Phosphated distarch phosphate	
1414	Acetylated distarch phosphate	
1420	Starch acetate esterified with acetic anhydride	
1421	Starch acetate esterified with vinyl acetate	
1422	Acetylated distarch adipate	
[1423	Acetylated distarch glycerol] ¹⁰	
1440	Hydroxypropyl starch	
1442	Hydroxypropyl distarch phosphate	
	Colours	
100	Curcumin (for edible cheese rind)	Limited by GMP
101	Riboflavin	Limited by GMP

¹⁰ No ADI allocated. Its specification withdrawn.

140	Chlorophyll	Limited by GMP
141	Copper chlorophylls	15 mg/kg, singly or combined
160a(i)	β-Carotene (synthetic)	25 mg/kg
160a(ii)	Carotenes (natural extracts)	600 mg/kg
160b	Annatto extracts	
	- normal coloured	10 mg/kg (on bixin/norbixin basis)
	- orange coloured	25 mg/kg (on bixin/norbixin basis)
	- deep orange coloured	50 mg/kg (on bixin/norbixin basis)
160c	Paprika oleoresins	Limited by GMP
160e	β-apo-carotenal	35 mg/kg
160f	β-apo-8'-Carotenoic acid, ethyl ester	35 mg/kg
162	Beet red	Limited by GMP
171	Titanium dioxide	Limited by GMP

Preservatives

200	Sorbic acid	1 g/kg of cheese, singly or combined, calculated as sorbic acid
202	Potassium sorbate	
203	Calcium sorbate	
234	Nisin	12.5 mg/kg
280	Propionic acid	Limited by GMP
281	Sodium propionate	
282	Calcium propionate	
283	Potassium propionate	
	<u>For surface/rind treatment only:</u>	
235	Pimaricin (natamycin)	2 mg/dm ² of surface. Not present in a depth of 5 mm

Foaming agents (for whipped products only)

290	Carbon dioxide	Limited by GMP
941	Nitrogen	Limited by GMP

Sliced, cut, shredded and grated products only (surface treatment)

Anticaking agents

460	Cellulose	Limited by GMP
551	Silicon dioxide amorphous	10 g/kg singly or in combination. Silicates calculated as silicon dioxide
552	Calcium silicate	
553	Magnesium silicates	
554	Sodium aluminosilicate	
555	Potassium aluminosilicate	
556	Calcium aluminium silicate	
559	Aluminium silicate	
560	Potassium silicate	

Preservatives

200	Sorbic acid	1g/kg of cheese, expressed as sorbic acid
202	Potassium sorbate	
203	Calcium sorbate	
280	Propionic acid	Limited by GMP
281	Sodium propionate	
282	Calcium propionate	
283	Potassium propionate	

5. CONTAMINANTS

5.1 HEAVY METALS

The products covered by this Standard shall comply with the maximum limits established by the Codex Alimentarius Commission.

5.2 PESTICIDE RESIDUES

The products covered by this Standard shall comply with the maximum residue limits established by the Codex Alimentarius Commission.

6. HYGIENE

6.1 It is recommended that the products covered by the provisions of this standard be prepared and handled in accordance with the appropriate Sections of the Recommended International Code of Practice - General Principles of Food Hygiene (CAC/RCP 1-1969, Rev. 3-1997), and other relevant Codex texts such as Codes of Hygienic Practice and Codes of Practice.

6.2 From raw material production to the point of consumption, the products covered by this standard should be subject to a combination of control measures, which may include, for example, pasteurization, and these should be shown to achieve the appropriate level of public health protection.

6.3 The products should comply with any microbiological criteria established in accordance with the Principles for the Establishment and Application of Microbiological Criteria for Foods (CAC/GL 21-1997).

7. LABELLING

In addition to the provisions of the Codex General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1 - 1985, Rev. 1-1991; *Codex Alimentarius*, Volume 1A) and the General Standard for the Use of Dairy Terms (CODEX STAN 206-1999), the following specific provisions apply:

7.1 NAME OF THE FOOD

The name of the food shall be unripened cheese or cream cheese, as appropriate. However, these names may be replaced by other variety names, provided that the product complies with the specific provisions of this Standard. Such designations include names which are specified in the national legislation of the country in which the product is manufactured and/or sold, or names existing by common usage, provided that such designations do not create an erroneous impression in the country of retail sale regarding the character and identity of the food.

The words “unripened cheese” may be omitted in the designation of an individual cheese variety reserved by a Codex standard for individual unripened cheeses.

In case the product is not designated by an alternative or a variety name, but with the singular designation “unripened cheese”, the designation may be accompanied by a descriptive term such as provided for in Section 7.1.1 of Standard A-6.

Unripened cheese may alternatively be designated “fresh cheese” provided it is not misleading to the consumer in the country of retail sale.

7.2 DECLARATION OF MILKFAT CONTENT

The milk fat content shall be declared in a manner found acceptable in the country of sale to the final consumer, either (i) as a percentage by mass, (ii) as a percentage of fat in dry matter, or (iii) in grams per serving as quantified in the label, provided that the number of servings is stated.

Additionally, the following terms may be used:

<i>High fat</i>	(if the content of FDM is above or equal to 60%)
<i>Full fat</i>	(if the content of FDM is above or equal to 45% and less than 60%)
<i>Medium fat</i>	(if the content of FDM is above or equal to 25% and less than 45%)
<i>Partially skimmed</i>	(if the content of FDM is above or equal to 10% and less than 25%)
<i>Skim</i>	(if the content of FDM is less than 10%)

7.3 INGREDIENTS LISTING

Rennet or other safe and suitable coagulating enzymes of animal, plant, or microbial origin may be declared as coagulating enzymes in the list of ingredients.¹¹

7.4 LABELLING OF NON-RETAIL CONTAINERS

Information required in Section 7 of this Standard and Sections 4.1 to 4.8 of the General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1-1985, Rev. 1-1991; *Codex Alimentarius*, Volume 1A) and, if necessary, storage instructions, shall be given either on the container or in accompanying documents, except that the name of the product, lot identification and the name and address of the manufacturer or packer shall appear on the container, and, in the absence of such a container on the cheese itself. However, lot identification and the name and address of the manufacturer or packer may be replaced by an identification mark, provided that such mark is clearly identifiable with the accompanying documents.

8. METHODS OF SAMPLING AND ANALYSIS

See *Codex Alimentarius*, Volume 13.

[APPENDIX: INFORMATION ON USUAL PATTERNS OF MANUFACTURING FRESH CHEESE

This text is intended for voluntary application by commercial partners and not for application by governments.

1. APPEARANCE CHARACTERISTICS

- 1.1 Rind: none
- 1.2 Flavour: mild, creamy or acidic

2. MANUFACTURING METHOD

- 2.1 Coagulation: By the action of lactic bacteria, rennet and/or other suitable coagulating enzymes, by acidification, by other coagulation methods, or by combinations thereof.
- 2.2 Fermentation process: should fermentation of milk ingredients be carried out, lactic acid bacteria generally achieve this.

Storage: at refrigerated temperatures unless the products has been subject to heat-treatment in connection with the packaging and aseptically packaged.]

¹¹ Alternatively, the CCMMP may decide to recommend that the following class name is added to section 4.2.2.1 of the GSLPF: "Coagulating enzymes: Rennet or other safe and suitable coagulating enzymes of animal, plant, or microbial origin."