

CODEX ALIMENTARIUS COMMISSION

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**Food and Agriculture
Organization of
the United Nations**



**World Health
Organization**

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CX 2/7.2

**CL 2011/20-CAC/MMP
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TO: Codex Contact Points
Interested International Organisations

FROM: Secretariat, Joint FAO/WHO Food Standards Programme,
Codex Alimentarius Commission,
Viale delle Terme di Caracalla,
00153 Rome, Italy

SUBJECT: **Request for information on the possibility of further work to develop standard(s) covering processed cheese**

DEADLINE: 17 February 2012

COMMENTS: **To:**

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BACKGROUND

1. The 34th session of the Commission agreed to suspend a decision on discontinuation of work on a standard on processed cheese until its next session and requested the Codex Secretariat to prepare, in close consultation with the Chairperson of the Committee on Milk and Milk Products (CCMMP), a Circular Letter to explore the possibility of further work. The Circular Letter would seek detailed information on trade problems associated with these products and responses to questions on the potential scope, content and technical specifications that might pertain to these products to facilitate further discussion on possible new standards covering processed cheese. The information gathered through this process would then be analysed and submitted to the Executive Committee and the Commission in 2012 for further discussion on the feasibility of new work in this area (ref. REP11/CAC, paras 154-159).

REQUEST FOR INFORMATION AND COMMENTS

2. Codex Members and Observers, as directed above, are invited to provide information relating to the possibility of further work to develop standard(s) covering processed cheese. Information should be submitted on the basis of the form, attached as Annex 1 to this Circular Letter.
3. Annex 2 provides background information on previous work on standardization of processed cheese in Codex.

Annex 1

FORM FOR SUBMITTING INFORMATION RELATING TO POSSIBLE WORK ON PROCESSED CHEESE

This form may be retyped if more space is needed under any heading provided that the general format is maintained.

- 1. Name of the member or international organization submitting comments:

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Part 1: Detailed information on trade problems associated with trade of processed cheese.

- 2. Set out details of the trade problems that have arisen, including name of the country, in regard to processed cheese:

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- 3. Provide specific information on situations where diversity of legislation creates problems for trade in processed cheese:

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- 4. Provide specific information on situations where absence of legislation has created problems for trade in processed cheese (indicate the name of the country where this situation applies):

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Part 2: Detailed information on potential scope, content and technical specifications that might pertain to processed cheese

- 5. Do you consider that Codex should undertake further work to develop a standard (or more than one standard) covering processed cheese?

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If you answered "yes" to Question 5, please complete the following questions 6 to 8:

- 6. Outline the basis for each standard you propose by describing:

- The scope of the product(s) to be covered (i.e. product name(s) and corresponding description(s), noting whether they contain cheese, other milk products, and non-milk products):

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- The composition of each of the product(s) (e.g. % fat in dry matter (FDM), % dry matter (DM)):

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- The amount of cheese in the product(s) and how the cheese content is expressed (i.e. whether expressed on a product weight basis or a dry matter basis):

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- Permitted milk products:

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- Permitted non-milk products (e.g. flavouring foods, vegetable oils):

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- Other permitted ingredients (such as gelatine) and functional classes of food additives:

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- The technical specifications for each of the product(s):

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- The labelling provisions specific to each of the product(s):

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.....

Ensure that the boundaries between products are clear, including the boundaries with related foods.

7. Please provide any further justification for each standard you propose, as described in the *Criteria for the Establishment of Work Priorities and the Guidelines on the Application of the Criteria for the Establishment of Work Priorities* (Criteria Applicable to Commodities)¹:

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8. Please explain, in your view, on what basis the proposed standard(s) may be acceptable internationally, bearing in mind the nature of previous discussions in CCMMP and CAC:

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¹ Codex Procedural Manual, 20th edition, pages 40-43 (English version).

Annex 2**BACKGROUND INFORMATION ON PREVIOUS WORK ON STANDARDIZATION OF PROCESSED CHEESE IN CODEX****Revision work undertaken by CCMMP**

CCMMP began work at its first session on a revised standard for processed cheese, as a result of a decision of its predecessor committee, the Joint FAO/WHO Committee of Government Experts on the Code of Principles Concerning Milk and Milk Products, sometimes known as the Milk Committee (MC), to consider revision of existing standards in its future programme of work, and a decision of the Codex Alimentarius Commission at its 19th session to review all Codex standards.

CCMMP met in 9 sessions between 1994 and 2010. During that time the committee's work on development of a standard for processed cheese involved:

- Six proposed draft standards, which were circulated for comments and presented to the committee;
- Five working groups or drafting groups, which held five physical meetings;
- A survey of Codex members and observers to gather information Codex members and observers were invited to submit information on name or designation of the product, quantity produced, labelling of cheese content, use of gelatine, starches and stabilizers, fat and dry matter content, and national legislation in relation to these points; and
- Two reviews by the committee as a whole of proposed draft standards section by section.

Details of the work are given in the references below.

Issues involved in standardizing processed cheese

CCMMP identified a number of issues that were central to the task of developing one or more standards for processed cheese. These included:

Approach

CCMMP considered whether to revise the previous standards or adopt a new approach. The committee agreed that the approach used in the previous standards was not satisfactory, and that a new approach was needed. The committee therefore considered drafts which aimed to cover the relevant products in one standard, which (at least initially) was kept simple without many detailed requirements; followed the format of other standards for milk products; set out minimum requirements; aimed to ensure fair international trade; and aimed to protect names of the most important dairy products in international trade and sufficiently ensure consumer protection accordingly.

Later drafts became more detailed, but in its directions to the final working group, CCMMP asked that in revising the standard the group should give full attention to its simplification.

The previous standards have been revoked (*see* further details below).

Product composition

CCMMP recognized that the composition of processed cheese, particularly the cheese content, is an important issue and made several attempts to address it. Early working groups advised that minimum content of cheese (in a quantified form) did not appear to be an approach that could obtain agreement, and national legislation did not generally specify minimum content of cheese. Two suggested alternatives were investigated but did not gain support. Instead CCMMP asked a later working group to include labelling provisions for cheese content for consumer information; and it asked the final working group to address cheese content.

At the meeting of the final working group on processed cheese in 2009, composition and cheese content were discussed at length, but the working group was not able to develop a text that met the needs of all delegations while being consistent with its mandate to simplify and improve the text. After considerable discussion, it was concluded that it would not be possible to reach an agreement on this point.

Scope

CCMMP limited the scope of its work by putting most of its effort into the product "processed cheese", excluding processed cheese products and processed cheese preparations. The final working group was asked to consider a labelling approach to distinguish between the products. The working paper prepared for the working group included options for labelling according to moisture content, and for declaration of cheese content, but these options were not pursued because they are related to the issue of product composition, on which there was no agreement.

Permitted ingredients

CCMMP considered the acceptability of use of gelatine, starches and stabilizers in the manufacture of processed cheese, for instance by reference to national legislation. However, again, possible options were not considered because the issue is related to product composition, on which there was no agreement.

Discussions on discontinuation of work

At its 9th meeting (2010), in view of the impossibility of further progressing the work on the proposed draft Standard for Processed Cheese, CCMMP agreed to discontinue the work on this matter.

The 33rd session of the Commission considered the recommendation from CCMMP, but deferred a decision on discontinuation of work in the light of renewed calls to continue work and requested the interested Coordinating Committees to discuss the necessity and the scope of regional standards and report their findings to the 34th Session. The 34th Session considered the reports from Coordinating Committees and a recommendation from the Executive Committee, as well comments from delegations and the Chairperson of CCMMP, before reaching the decision noted in the Background of the Circular Letter.

Previous standards

Until 2010 Codex had three standards covering processed cheese and processed cheese preparations:

- *Codex General Standard for Named Variety Process(ed) Cheese and Spreadable Process(ed) Cheese* (CODEX STAN 285-1978);
- *Codex General Standard for Process(ed) Cheese and Spreadable Process(ed) Cheese* (CODEX STAN 286-1978); and
- *Codex General Standard for Process(ed) Cheese Preparations (Process(ed) Cheese Food and Process(ed) Cheese Spread)* (CODEX STAN 287-1978).

These standards were elaborated by the MC.

Governments notified the MC of their acceptances of standards for milk products. At the last meeting of the MC in 1990, 6 countries notified acceptance of CODEX STAN 285-1978, and 5 countries notified acceptance of CODEX STAN 286-1978 and CODEX STAN 287-1978. Three of these countries accepted with reservations of various kinds.

The International Dairy Federation's (IDF's) 1996 report to CCMMP noted the difficulties in the task of revising the standards. It pointed out that there were overlaps between definitions and lack of transparency of the standards. CODEX STAN 286-1978 and CODEX STAN 287-1978 were not defined in relation to each other and were overlapping with regard to the amount of cheese to be used. National legislation to a wide extent had not followed the standards.

These standards were revoked by the 33rd session of the Commission on the recommendation of CCMMP, which had noted that they were outdated and not used by industry.

Horizontal standards and commodity standards applying to processed cheese

When considering standardization of processed cheese it should be noted that a number of horizontal standards and commodity standards apply and provide valuable guidance on essential aspects related to processed cheese. These include:

Aspect	Applicable standards
Ingredients	Standards for cheese, other milk products and other foods
Food additives	<i>General Standard for Food Additives</i> (CODEX STAN 192-1995)

Aspect	Applicable standards
Contaminants	<i>General Standard for Contaminants and Toxins in Food and Feed</i> (CODEX STAN 193-1995) Maximum Residue Limits for Veterinary Drugs in Foods Maximum Residue Limits for Pesticides in Foods
Hygiene	<i>General Principles of Food Hygiene</i> (CAC/RCP 1-1969) <i>Code of Hygienic Practice for Milk and Milk Products</i> (CAC/RCP 57-2004)
Labelling	<i>General Standard for the Labelling of Prepackaged Foods</i> (CODEX STAN 1-1985) <i>General Standard for the Use of Dairy Terms</i> (CODEX STAN 206-1999)
Methods of sampling and analysis	<i>General Guidelines on Sampling</i> (CAC/GL 50-2004) <i>Recommended Methods of Analysis and Sampling</i> (CODEX STAN 234-1999)

References

The following references give details of CCMMP work on processed cheese.

CCMMP sessions	References
First session (1994)	CX/MMP 94/5 (Part 2) ALINORM 95/11, paras 33, 52 and 123
Second session (1996)	CX/MMP 96/4, Part (a) ALINORM 97/11, para 73
Third session (1998)	CL 1997/33-MMP ALINORM 99/11, paras 84-88
Fourth session (2000)	CX/MMP 00/7 ALINORM 01/11, paras 76, 77 and 122
Fifth session (2002)	CL 2001/20-MMP CX/MMP 02/9, CX/MMP 02/9-Add.1 and CRD 13 ALINORM 03/11, paras 100 - 103
Sixth session (2004)	CX/MMP 04/6/7 ALINORM 04/27/11, paras 84-90
Seventh session (2006)	CX/MMP 06/7/8, CX/MMP 06/7/8-Add.2 ALINORM 06/29/11, paras 107-120
Eighth session (2008)	CX/MMP 08/8/5 ALINORM 08/31/11, paras 50-77
Ninth session (2010)	CX/MMP 10/9/4 ALINORM 10/33/11, paras 40-42