



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME**  
**FAO/WHO COORDINATING COMMITTEE FOR EUROPE**

Twenty-eighth Session

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**PROPOSED DRAFT CODEX REGIONAL STANDARD FOR AYRAN**

**Comments at Step 3**

**(Turkey, IDF)**

**TURKEY**

**Background:**

The Codex Alimentarius Commission at its 33<sup>rd</sup> Session (Geneva, Switzerland, 5<sup>th</sup> – 9<sup>th</sup> July 2010) agreed to encourage relevant coordinating committees (i.e. CCNEA and CCEURO) to consider the development of regional standards for ayran. At its 27<sup>th</sup> session (Warsaw, Poland, 5<sup>th</sup> to 8<sup>th</sup> October 2010) the CCEURO Committee had decided to start new work on the development of the Regional Standard for Ayran. The CCEURO further agreed that subject to approval by the 34<sup>th</sup> Session of the Commission (Geneva, Switzerland, 4<sup>th</sup> – 9<sup>th</sup> July 2011). The work continued in an e-WG led by Turkey and the document was elaborated by physical working group chaired by Turkey.

**Turkey Position:**

Turkey request to revise the Proposed Draft Standard with the following:

1. At the first sentence delete the words “a fermented milk product” and add the words “a Drink Based on Fermented Milk” in the first paragraph of Section 2 (Description). So the first sentence would read “Ayran is a Drink Based on Fermented Milk as defined in Codex Standard for fermented milks CODEX STAN 243-2003) and composite milk product as defined in Section 2.3 of the General Standard for the Use of Dairy Terms (CODEX STAN 206-1999) obtained by.....”
2. At the first sentence delete the words “by adding water” in paragraph (b) of Section 2 (Description). So the first sentence would read “(b) fermentation of milk with adjusted dry matter content prior to fermentation with or without compositional modification as limited by the provision in Section 3.3.....”
3. Since the term “potable water” is an ingredient, it should be deleted from the section 3.1 Raw Materials and added to the section 3.2 Permitted Ingredients.

**IDF (International Dairy Federation)**

The International Dairy Federation (IDF) participated in the CCEURO Physical Working Group (PWG) on a proposed draft regional standard for ayran which was held on 29<sup>th</sup>-31<sup>st</sup> May 2012, in Istanbul (TR), and welcomes the opportunity to comment on the proposed draft standard that resulted from this meeting.

**GENERAL PRINCIPLES OF OUR COMMENTS:**

As general principles, IDF contends that:

- This draft regional standard should, as a minimum requirement, not contradict the requirements specified in the Codex Standard for Fermented Milks (Codex Stan 243-2003). Indeed it our understanding from discussions at the PWG Meeting that it is intended that the proposed draft regional standard should be in conformance with this existing Standard.
- The development of this regional standard should not re-open discussion on issues in fermented milks already decided upon in the development of that standard.
- The draft regional standard should, as far as possible, encompass ayran as already produced and sold in the CCEURO region. It is IDF's understanding that Codex standards are not intended or do not seek to prohibit products that are already sold legally on the market(s) of (a) country/countries but rather to facilitate fair trade (internationally or intra-regionally) in such products.

Our comments that follow are based on these general principles.

**1. SCOPE:**

IDF supports the scope as contained in the first sentence of ANNEX II of CX/EURO 12/28/6 and the basis for same as outlined in para.7 of the report contained in that document. However, as the meaning, intent and consequences of the second sentence of the Scope as drafted is at best unclear, IDF would recommend that this sentence be deleted from this section of the draft standard. If necessary suitably clear wording could be inserted as follows in Section 2. "*This Codex Regional Standard for ayran is in conformity with the Codex Standard for Fermented Milks CODEX STAN 243-2003*". Wording similar to this is already used in the Codex standards for individual varieties of cheese. Of course if such wording is used then the draft regional standard is obliged to conform in full with CODEX STAN 243-2003.

**2. DESCRIPTION:**

IDF contends that the definition in the opening paragraph of this section of the proposed draft should state that ayran is *a composite milk product as defined in Section 2.3 of the General Standard for the Use of Dairy Terms (CODEX STAN 206-1999)*, at least as far as the product produced as outlined in under (a) in this section is concerned.

Subject to meeting the criteria in other sections of Codex STAN 243-2003, ayran as described under (a) in this section, could fall into the category of Drinks Based on Fermented Milks (DBFMs) as described in section 2.4 of that standard. Of course if it were to be regarded as a DBFM it should also meet the requirements pertaining to the other Sections of that standard for this category of products. Thus in this regard a minimum level of fermented milk in the end product should be specified in Description (a) to ensure that it meets the definition of a composite milk product which requires that it is a product in which the milk, milk products, or milk constituents are an essential part in terms of quantity in the final product.

However IDF contends that ayran is not a fermented milk product (i.e. a fermented milk) as described in Section 2.1 of Codex Standard for Fermented Milks CODEX STAN 243-2003). It is clear to us that a product which involves the mixing of fermented milk with potable water (and/or other milk ingredients) would be a composite milk product as defined in Section 2.3 of the General Standard for the Use of Dairy Terms (CODEX STAN 206-1999), not a fermented milk per se, as outlined in Section 2.1 in CODEX STAN 243-2003.

Furthermore the same product cannot be both a fermented milk product and a composite product, albeit it may be a product made by mixing a fermented milk with water.

As regards the description under (b) in this section, IDF believes that since the process described involves the mixing of milk with water prior to fermentation and not to one involving the fermentation of milk as such, the resultant product would not be a fermented milk, as it would not meet the definition of a fermented milk in Section 2.1 of the Codex Standard for Fermented Milks. The modification of milk composition by the addition of water is not one of the means of such modification permitted under Section 4.2.2 of General Standard for the Use of Dairy Terms (CODEX STAN 206-1999); the

modification by the addition or withdrawal of milk constituents is what is permitted for this purpose. Of course if the fermentation of milk is carried out as a first step then followed by the mixing with potable water as a second step of what could be regarded as a single manufacturing process then the resulting product would meet the description under (a) and in that case description in (b) would not be necessary.

The product produced under description (b) may be a composite product as defined in in Section 2.3 of the General Standard for the Use of Dairy Terms (CODEX STAN 206-1999) but it would not meet the definition of either of the composite milk products included in Codex Standard 243-2003.

Another way this could be addressed is by replacing water by milk permeate in description (b). Milk permeate is already included (and described) in the Codex Standard for Milk Powders and Cream Powders CODEX STAN 207-1999), the Codex Standard for Evaporated Milks, (CODEX STAN 28-1971) and the Codex Standard for Sweetened Condensed Milks Milks, (CODEX STAN 281-1971)<sup>1</sup> as a means of standardising the milk protein content of these milk products. IDF is aware that this approach is used by ayran producers in some countries. If this approach is adopted by CCEURO, as a consequence the wording in sec. 2. as well as in sec. 3.1 has to be changed accordingly

## Sec. 2

„ (a) mixing yoghurt/alternate culture yoghurt as defined ... with water and/or milk permeate or  
 (b) fermentation ..... by adding water and/or milk permeate “

## Sec. 3.1

milk, yoghurt, alternate culture yoghurt,  
 potable water and/or milk permeate”

One additional point on this section, IDF understands from our members that some Ayran produced and sold in the CCEURO region is made by mixing Alternate Culture Yoghurt (using cultures of *Streptococcus thermophilus* and any *Lactobacillus* species) as defined in Section 2.1 of Standard 243-2003, with potable water, and not only by mixing yoghurt (using the two specific cultures of *Streptococcus thermophilus* and *Lactobacillus delbrueckii* subsp. *bulgaricus*) with potable water. IDF suggested this to the PWG but it was not adopted and the standard as in CX/EURO 12/28/6 does not include this. As such products are on the market in the CCEURO region, IDF suggests that CCEURO should consider further the inclusion of such products in this draft regional standard.

## 3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

### 3.1. RAW MATERIALS

Given our suggestions in the last section, as a consequence IDF would suggest that if adopted then the first bullet point of Section 3.1 should be amended to read:-

Milk or yoghurt or alternate culture yoghurt,  
 Potable water and/or milk permeate

### 3.2. PERMITTED INGREDIENTS

For consistency with other Codex milk product standards IDF suggests that in the third bullet point the words *products obtained from milk* be used instead of *dairy ingredients*.

Flavoured ayran products - the draft regional standard as contained in CX/EURO 12/28/6, only addresses plain (unflavoured) ayran; there should be some discussion at CCEURO as regards flavoured ayran. The outcome of these discussions may require this section being expanded to cover the addition of flavouring foods; it also has consequences in Section 8 of the draft where wording similar to that contained in Section 7.1.3 of Codex Standard 243-2003 could be used.

### 3.3. COMPOSITION

As regards the minimum protein, min. microbiological counts for starter cultures and for labelled microorganisms IDF would propose that the approach used in the Codex Standard for Fermented

<sup>1</sup> Therein milk permeate is defined as the product obtained by removing milk proteins and milk fat from milk, partly skimmed milk or skimmed milk by ultrafiltration.

Milks 243-2003 be followed:-

**Minimum Protein Content:-**

In Standard 243-2003, the minimum protein content of fermented milks is specified as 2.7%. For the composite products contained in Codex Stan 243-2003 (Flavoured Fermented Milks and Drinks based on Fermented Milks) there is no min. protein content stipulated. Rather the following provisions can be found:

Flavoured Fermented Milks (section 2.3): ... contain a maximum of 50% (m/m) of non-dairy ingredients (such as....) and /or flavours

Drinks Based on Fermented Milk (section 2.4): ... contain a minimum of 40% (m/m) fermented milk.

While the minimum 2% protein given in the draft is likely to meet this requirement, it should also reference the requirement to meet the minimum percentage specified for fermented milk – at least as regards the product as specified under Description (a). The situation as regards the product described under (b) is a bit more complicated in this regard but as it is stated in Section 2 that this product should “*give an end-product of similar physical, chemical and organoleptic characteristics as the product defined under (a)*”, then it may be possible to state that this product should meet the compositional requirements as specified in (a).

Furthermore, IDF is aware that in some CCEURO member countries, the minimum figure for protein content in this category is 1.7% (rather than 2%) and these products are in conformity with the min. protein requirement for Drinks based on Fermented Milk as specified in Section 3.3 of Codex Standard 243-2003. These products would be outside the requirement as given in the draft of the proposed standard as contained in CX/EURO 12/28/6.

**Minimum content of starter cultures and labelled microorganisms**

IDF should like to point out that for the fermented milks listed in Section 3.3 of Codex Standard 243-2003 the minimum counts specified is  $10^7$  cfu/g. Again for a composite product based on fermented milk such as ayran, the minimum microbiological counts should be based on the proportion of fermented milk product contained in the end product – at least as regards the product as specified under Description (a). A level of  $10^6$  cfu/g as specified in CX/EURO 12/28/6 would be too low as it would represent the level due to the product containing just 10% fermented milk and this would not be a composite milk product as defined in Section 2.3 of the General Standard for the Use of Dairy Terms (CODEX STAN 206-1999). Again the situation as regards the product described under (b) is a bit more complicated in this regard but as it is stated in Section 2 that this product should “*give an end-product of similar physical, chemical and organoleptic characteristics as the product defined under (a)*”, then it may be possible to state that this product should again meet the compositional requirements as specified in (a).

As regards the provision which specifies that ayran should not be heat treated after fermentation. This is likely to be the subject of further discussion and decision at CEURO, as based on information from our members, ayran heat treated after fermentation is already (legally) on the markets of Germany, France, Switzerland and some other CCEURO countries.

**Salt content**

IDF notes that a max. salt content is specified – max. 1% (m/m) and asks if a min. content of salt (e.g. min. 0.4% (m/m)) should also be specified as its use seems typical for ayran.

**4. FOOD ADDITIVES**

IDF notes that a request inclusion of ayran heat-treated after fermentation, which was the subject of a written comment from one CCEURO Member, who was not present at the CCEURO WG Meeting. This request not discussed there and therefore there was no discussion on the draft standard which states that *food additives should not be used*.

Depending on the outcome if provisions as regards the inclusion of ayran heat-treated after fermentation are discussed and agreed at the CCEURO meeting, IDF would suggest that for such

products (heat treated after fermentation) the use of stabilizers such as Carob bean gum (INS 410), guar gum (INS 412), pectins (INS 440) and sodium carboxymethyl cellulose (INS 466) at least are justified, together with the stabilizing ingredients (gelatin and starch) listed in Section 3.2 of Codex Standard 243-2003; these provisions would be in compliance with the food additive provisions in Section 4 of the latter standard.

## 5. CONTAMINANTS

IDF supports this standard wording as used in all Codex milk product standards.

## 6. HYGIENE

IDF supports this standard wording as used in all Codex milk product standards.

## 7. PACKAGING AND STORAGE

IDF notes that this section is not included in Standard 243-2003 nor indeed any of the other milk product standards. Its provisions are already covered under Section 6 FOOD HYGIENE and as regards the second paragraph, also by the provisions of the Section 4.7.2 of the GSLPF. Hence IDF would propose that this section should be deleted from the draft for consistency with other milk products standards and since its provisions are addressed in other ways.

## 8. LABELLING

### 8.1. Name of the Food

If Ayran heat treated after fermentation is included in the draft regional standard, we would suggest that an additional Section [8.1.2?] would be required and IDF would request the CCEURO WG take cognisance of the approach used in Section 7.1.2 of Standard 243 – 2003 regarding the designations of heat treated products, which is as follows :

*Products obtained from fermented milk(s) heat treated after fermentation shall be named “**Heat Treated Fermented Milk**”. If the consumer would be misled by this name, the products shall be named as permitted by national legislation in the country of retail sale. In countries where no such legislation exists, or no other names are in common usage, the product shall be named “**Heat Treated Fermented Milk**”*

This is the form of words used in Standard 243-2003 for fermented milks heat treated after fermentation.

### 8.2. Declaration of Fat Content

IDF supports and indeed proposed to the PWG that ayran with the highest minimum fat content in CX/EURO 28/12/6, be designated as just *ayran* (without a fat level qualifier term). However, as regards the actual level specified as 1.8% in the draft, IDF is aware that in some CCEURO member countries, the minimum figure for fat content in this category is 1.7% (rather than 1.8%). These products would be outside the requirement as given in the draft of the proposed standard as contained in CX/EURO 12/28/6.