CONSIDERATION OF PROPOSED DRAFT STANDARDS AND RELATED TEXTS AT STEP 5
Government Comments

CODEX COMMITTEE ON MILK AND MILK PRODUCTS

SPAIN

Proposed Draft Revised Standard for Creams, Whipped Creams and Fermented Creams (ALINORM 01/11, Appendix VI)

Section 3.2. Permitted ingredients

Paragraph 57 of ALINORM 01/11 states that the Committee agreed to include gelatine and starches at the same level as stated in the Proposed Draft Standard for Unripened Cheese. However, the Draft Standard lays down a maximum of 6 g/kg singly or in combination with the thickening and modifying agents listed in section 4. This contradiction must be clarified.

The “similar heat treatments” mentioned in the first line of section 3.2. should be specified.

Proposed Draft Revised Standard for Fermented Milks (ALINORM 01/11, Appendix VII)

Section 2. Description

Section 2.1 of the Draft Standard gives three alternatives for controlling the count of specific microorganisms for individual products because of the difficulty to do so at the time of consumption.

The Kingdom of Spain is of the opinion that the closest alternative to the "time of consumption" and "minimum durability" is the "point of sale to the final consumer", and therefore supports this option.

The final sentence in Section 2.1. of the Draft Standard A.11 requires qualifying because the addition of other cultures other than those specified for fermented milks mentioned in this section could create different products if no limits are placed on the maximum number of those which can be added. It is therefore proposed to replace the wording with the following:

"In addition to the specific cultures of fermented milks mentioned above, other cultures can be added to fermented milks in quantities that do not alter their characteristics".
Section 2.3. Composite fermented milk products

Since composite fermented milk products already exist on the market with 50% of non-dairy ingredients and this same percentage is in compliance with the General Standard for the Labelling of Prepackaged Foods, we propose that this limit should prevail and not 30%.

Section 3.3. Composition

We broadly agree with section 3.3. of Draft Standard A-11 with the following proviso: The table for this section can be considerably reduced. We therefore propose replacing it with the following:

<table>
<thead>
<tr>
<th></th>
<th>Fermented Milks</th>
<th>Kefir</th>
<th>Kumys</th>
<th>Mild Yoghurt</th>
</tr>
</thead>
<tbody>
<tr>
<td>Milk protein. Protein content is 6.38 multiplied by the total Kjeldahl nitrogen determined (% w/w)</td>
<td>min 2.8%</td>
<td>-</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Titrable acidity, expressed as % lactic acid (% w/w)</td>
<td>min 0.6%</td>
<td>min 0.7%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sum of specific microorganisms defined in section 2.1 (cfu/g, in total)</td>
<td>min 10^7</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Labelled additional microorganisms (optional) (cfu/g, total)</td>
<td>min 10^6</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ethanol (% vol./w)</td>
<td></td>
<td>min 0.5%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Yeasts (cfu/g)</td>
<td></td>
<td>min 10^4</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

In composite fermented milk products the above criteria apply to the fermented milk part in the products, however the microbiological criteria (based on the proportion of fermented milk) are valid up to the point of sale to the final consumer. These microbiological requirements do not apply to products heat-treated after fermentation.

Section 7.1 Name of the food

We propose removing the quotation marks in the third paragraph of section 7.1.1.

UNITED STATES OF AMERICA

*Proposed Draft Revised Standard for Creams, Whipped Creams and Fermented Creams (ALINORM 01/11, Appendix VI)*

*Proposed Draft Revised Standard for Fermented Milks (ALINORM 01/11, Appendix VII)*

*Proposed Draft Revised Standard for Whey Powders (ALINORM 01/11, Appendix VIII)*

The United States recommends the adoption of the above standards at Step 5. However, the United States notes that these standards contain a number of critical issues in square brackets. As a result, member countries may not be able to accurately evaluate the impact of these standards on their economies. The United States recommends that the Executive Committee remind committees that text advanced to Step 5 should contain the least amount of technical data in square brackets and the committee’s should try to resolve a great number of issues prior to recommending advancement of the text to Step 5.

CODEX COORDINATING COMMITTEE FOR ASIA

*Proposed Draft Standard for Aqueous Coconut Products (ALINORM 01/15, Appendix II)*

MALAYSIA

4. Food Additives

Malaysia would like to propose that sodium benzoate as a preservative should not be permitted in the product as the product is pasteurized.

POLAND

We propose to set up requirements for heavy metals which are harmful to health.