codex alimentarius commission

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

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Agenda Item 4

CX/FO 03/4-Add.2

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FATS AND OILS
Eighteenth Session
London, United Kingdom, 3 – 7 February 2003

DRAFT STANDARD FOR FAT SPREADS AND BLENDED SPREADS

COMMENTS AT STEP 6

The following comments have been received from European Community in response to CL 2002/21-FO.

EUROPEAN COMMUNITY

The European Community would like to present the following comments :

1. Scope and Description (2.1):
The European Community thinks that this regulation shall apply to products which remain solid at a temperature of 20°C.

3.1.2.1 Blended spreads
Blended spreads must contain a milk-fat content of between 10% and 80% of the total fat content

3.1.2.2 Blended spreads
Three-quarter fat blend must contain 60-62% fat, whereas the proposal states 59-61% fat.

In order to prevent people from using "blended spreads" as sales designations when only a low percentage of milk fat is used as ingredient and in order to make it possible a clear distinction between blended spreads and fat spreads, blended spreads shall contain more than 10% milk fat.

4. – Food additives

4.4. Preservatives

Justification should be provided from countries that wish to use benzoic acid and its salts (210-213) in these types of products. In the view of the European Community, sorbic acid and its salts (E 200 – 203) are sufficient for preservation of these products.

4.5. Thickening and stablising agents

Phosphoric acid and several phosphates (338, 339, 340, 341, 450 (i)) are proposed for different functions such as stablising agents and acidity regulators. This group of additives has a numerical ADI of 70 mg/kg b.w., therefore, their use should be limited by a maximum level and not by GMP.

In addition, it is superfluous to list cellulose (460 (ii)) and microcrystalline cellulose (460(i)) twice in the table. It should be also verified what is meant with starch acetate listed without INS-number.

4.12. Miscellaneous

The need for use of propylene glycol (1520) and silicon dioxide (551) should be justified.

7. Labelling

Fat hydrogenation and inter-esterification should be mentioned on the label, if required in the country of sale.

The term "reduced fat" may be used for products with a fat content of more than 41% but not more than 62%.

The terms "low fat" or "light" may be used for products with a fat contyent of 41 % or less.

Attention is drawn to the fact that the requirement to indicate the average fat content may lead to inconsistencies. Examples: According to the draft Standard, margarine is a product containing at least 80% fat. If 80% fat is indicated, less than 80% may be found (which would be quite normal, if 80% is an average). The control result would not be in compliance with the definition of the product. Similar problems would occur with half- and three-quarter fat products. In our opinion two aspects have to be addressed:

- a reference to an average fat content makes sense only, if the possible variation of the fat content is restricted. In a product with a declared fat content of 80% only 78% fat or even less may be found, though the average fat content is 80%. This leads to problems when testing compliance.

- Definitions and labelling requirements should be compatible.

Possible solutions:
- Results deviating by more than x percentage points from the declared value are regarded as unacceptable
- Half-fat products: only 40% fat can be declared.
- Margarine: 80% fat is a minimum fat content or,alternatively, results down to 80 - x % are accepted.

7.1.1 Name of the food

The use of the term margarine should be restricted to margarine 80-90% fat, three quarter fat margarine 60-62% fat and half fat margarine 39-41% fat, whereas it can be applied to all products in the proposal.