

codex alimentarius commission



FOOD AND AGRICULTURE
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Agenda Item 4 (b)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON MILK AND MILK PRODUCTS

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PROPOSED DRAFT REVISED STANDARDS FOR INDIVIDUAL CHEESES COMMENTS AT STEP 3

Comments from: Argentina, Australia, Canada, Germany, New Zealand, Switzerland and United States

General

ARGENTINA

4.4.1. Colours

We suggest allowing the use of “Curcumin (INS N° 100)” for cheeses. In the review of some current drafts standards it has been removed from allowed colours list. Our national legislation permits its use in order to correct the natural seasonal variability of the colour in the raw material used for the manufacturing of cheese or in order to obtain a product with the same colour along the year or give some cheeses a specific color.

The “Titanium Dioxide (INS N° 171)” is allowed for Provolone Cheese as “bleaching agent” and as “colour” for Cream Cheese. We propose assigning the same function: "colour" in both cases.

AUSTRALIA

Australia supports addressing as many requirements for individual cheeses as possible in the Codex General Standard for Cheese (Codex Stan A-6) rather than proliferating identical text throughout individual cheese variety standards. We note that several sections of the draft standards for individual cheeses are identical and Australia therefore recommends these sections of individual standards be shortened or removed and only fully covered in the Codex Stan A-6.

This is particularly so for additives/processing aids and Australia supports general listings in the GSFA and the processing aid inventory with special permissions by exception rather than inclusion in many individual standards.

SECTION 3.2. PERMITTED INGREDIENTS - Australia points out that allergies to rice, corn and potato also occur.

CANADA

Canada would like to offer the following comments that pertain to each of the individual cheeses:

Section 4 Food Additives:

Canada supports the addition of carbon dioxide (INS 290) in milk for cheesemaking as an acidity regulator at a GMP level. Canada recommends that where preservatives are permitted, sodium sorbate should be added to the individual listing. As well, where stabilizers/thickeners permit carageenan and its salts, calcium carageenan should be added to the individual listing. These additives have a history of safe use, are technologically necessary, and are currently being assessed by the Codex Committee on Food Additives and Contaminants (CCFAC) for the uses indicated.

Section 7 Labelling:

Canada notes that the raw materials for the cheeses include both cow and buffalo milk and recommends adding the following statement to Section 7.1 Name of the Food - “If the consumer would be misled by the omission, the animal source of the milk shall be declared in a manner acceptable in the country of sale to the final consumer.”

7.2 Country of Origin - Canada supports removing the square brackets in the footnote which would retain the examples used to clarify “substantial transformation”.

GERMANY

Based on the example of Cheddar (C-1), Germany would first like to submit comments which apply to all standards for individual cheese varieties.

a) Scope

For reasons of clarification, the following sentence, which used to be contained in earlier documents, should be re-inserted as first sentence in section 1 “Scope”: **“The name of the product may be used exclusively for cheese complying with this standard.”**

b) Description

Comparable to the Standard for Emmental (C-9), the words **“manufactured and”** should be inserted after **“the cheese is”** in the last sentence of the first paragraph of section 2 “Description”.

Instead of the explanatory notes in footnote 1, reference should only be made to Appendix VI of ALINORM 03/11.

Section 2 “Description” of the Standard for Emmental (C-9) contains taste requirements while this is currently not the case for the other standards. In view of the fact that taste is an important differentiating factor between the individual cheese varieties, the typical taste should also be described for all other varieties of cheese. Germany therefore suggests to entrust the International Dairy Federation with the formulation of “typical taste” requirements.

For some cheese varieties, minimum ripening periods should be introduced as they have in principle an influence on the typical characteristics of a certain cheese variety.

Concrete suggestions for minimum ripening periods will be made under 2) within the scope of our comments on the standards for individual cheeses. In addition to that, the question arises whether this step should be accompanied by a definition of additional ripening parameters, e.g. temperatures. Germany therefore suggests to entrust the International Dairy Federation with the further development of such details.

As long as this has not been completed, the currently indicated temperature values should be (temporarily) deleted.

In the second paragraph of section 2 “Description”, the second sentence (“Alternative ripening conditions...”) should be deleted in all standards.

Germany rejects the use of ripening enhancing enzymes as they undermine the typical ripening process for a particular cheese, thus automatically making essential and typical characteristics (defined in the standard) superfluous. Accordingly, the indents referring to “safe and suitable enzymes to enhance the ripening process” in section 3.2 “Permitted Ingredients”, should be deleted in all standards.

The differentiation between products intended for direct consumption and products intended for further processing is rejected. The standards for individual cheese varieties are meant to create uniform requirements for products with a particular name. Lowering these requirements for cheese that is intended for further processing would contradict this objective.

For this reason and in order to avoid consumer deception, the last sentence of the second paragraph of section 2 “Description” should be deleted.

With respect to some cheese varieties, the weight also has a fundamental influence on the typical characteristics of these cheeses. Germany therefore suggests that, comparable to the Standard for Emmental (C-9), weight requirements are also defined for some standards for individual cheeses. Concrete suggestions for typical weights will be made under 2) within the scope of our comments on the standards for individual cheeses.

c) Food Additives

As a matter of principle, food additives should be used in a restrictive way to maintain the reputation and the quality of the products. When consumers think of dairy products, they actually think of products that are as close as possible to their natural state.

It can be gathered from the Attachment (p. 117) that it is generally agreed that the use of a particular food additive must be technologically justified. In this respect, it is to be examined for each individual food additive whether the technological necessity is given in the relevant standard.

For this reason, Germany declares itself against the introduction of the so-called “table approach”. The additives should be specified in a list, as has been the case so far, and the technological necessity should have to be explained by those who regard the use of a particular food additive as necessary.

Section 3.2 “Permitted ingredients” allows the use of “rice, corn and potato flours and starches”. The use of “anti-caking-agents” has thus become unnecessary. Germany therefore suggests to delete the additive functional class “anti-caking agents” from the table of food additives.

d) Labelling

In section 7, the words “**In addition to**” should be replaced with “**In accordance with**”.

This section refers to both the Codex General Standard for the Labelling of Prepackaged Foods and the General Standard for the Use of Dairy Terms. According to section 4.3.1 of the General Standard for the Use of Dairy Terms, “a product **may** be named as specified in the Codex Standard”. This is, however, in contradiction to the provision in section 4.1.1.1 of the General Standard for the Labelling of Prepackaged Foods, which reads as follows: “Where a name or names have been established for a food in a Codex Standard, at least one of these names **shall** be used.” This contradiction should be resolved by the Committee on Milk and Milk Products.

e) Name of the food

In section 7.1, the first sentence of the first paragraph should be as follows: “**In accordance with section 4.1.1.1 of the Codex General Standard for the Labelling of Prepackaged Foods only products in conformity with this standard shall be designated XXX**”.

In the respective standards for individual cheeses, XXX is to be replaced with the appropriate name.

The second paragraph of section 7.1 should be deleted.

The third paragraph of section 7.1 should refer to section 7.2 instead of section 7.3.

f) Declaration of milkfat content

With respect to section 7.3 “Declaration of milkfat content”, Germany suggests to establish tolerance levels for the varying fat contents.

g) Appendix

The Appendix should only contain information that is voluntarily applied by the relevant commercial partners. The second sentence of the Appendix is not in line with this objective and contradicts the first sentence which deals with the voluntary application. The second sentence should therefore be deleted.

NEW ZEALAND

New Zealand welcomes the work that IDF has put into developing these drafts and finds they are generally satisfactory.

SWITZERLAND

Switzerland welcomes the opportunity to submit comments on the above-mentioned Agenda Item.

We would like to thank IDF for revising the proposed draft Standards for individual cheeses and we acknowledge that this was an enormous task. Nevertheless, Switzerland would like to express its reservations regarding the outcome of the revision. In our general remarks, we would like to provide some input, which we hope, will contribute to a broader discussion on some of the issues which have been difficult to resolve in the past.

General Remarks

We were astonished to see how much the different Cheese Standards were aligned to each other.

We have listed some recommendations, which - to our understanding - lead to the levelling of the different Cheese Standards, as follows:

- According to Recommendation no. 5, specific conditions / elements in the production of the cheeses were considered as "unnecessary additional detail". To our understanding, this is not the case, because these details are necessary to understand why certain characteristics are developed in one cheese but not in others. Therefore, we do not agree with this recommendation and thus propose that relevant technological details be inserted in the individual Standards.
- According to Recommendation no. 6, the terminology for the texture is aligned. The result is that for instance Cheddar and Tilsiter have the same texture, even though one is a hard cheese and the other is a semi-hard cheese. We have taken note of the fact that IDF has initiated work "*...with the aim of identifying even better texture descriptors and will report to the CCMMP when conclusions can be made*".

We therefore propose that the cheese descriptors remain in square brackets until IDF develops better texture descriptors.

- We do not agree with Recommendation no. 20, because we believe that for cheese with a variety name, no distinction should be made whether it is used for further processing or used for direct consumption. Consumers could be misled about the true nature of the variety cheese used for the processed product if it is not produced in the same way as that for direct consumption.
- We further propose the deletion of Recommendation no. 24, since the justification for the addition of ripening enhancing enzymes in the list of permitted ingredients is of purely economic character.
- Regarding Recommendation no. 36, we agree that all additives should be considered on a Standard-by-Standard basis and only be included if they are found to be technological necessary. We'd like to point out that according to the Section on Food Additives in the Format for Codex Commodity Standards (Procedural Manual, 13th Edition), it is stated that "this section should contain the names of the additives permitted and, where appropriate, the maximum amount permitted in the food." It is further stated that the Standard should include a tabulation with the "Name of the additive, its maximum level (in percentage or mg/kg)". Therefore, tables which simply indicate the functional additive classes which are technologically justified can only be considered as additional information.

Furthermore, we do not agree with the addition of INS 508 Potassium Chloride to all Cheese Standards, with the exception of C-16 and C-31.

- As regards Recommendation no. 52, we believe that the country of origin (country in which the cheese was produced) should be indicated in all cases, as this indication is of great relevance in international trade. We would like to point out that according to the CCFICS Guidelines for Generic Official Certificate Formats and the Production and Issuance of Certificates (*CX/GL 38-2001*) the country of dispatch (considered as Country of Origin) is required.

Bearing in mind the enormous difficulties encountered in the identification of the specific characteristics of the named cheese varieties and in a bid to obtain a compromise wording, also considering the levelling of the C-Standards as proposed, we wonder whether the different C-Standards should be maintained. The remaining differences between the individual cheese standards are negligible and could mislead consumers. Therefore, we would like to propose that the Standards be grouped as follows:

| <i>New Standard (or Annex to A6)</i> | <i>Existing C-Standards to be replaced</i> |
|--|---|
| Soft mould surface ripened cheese | Brie, Camembert, Coulommiers |
| Firm / semi-hard cheese | Edam, Gouda, Tilsiter, Saint-Paulin, Danbo, Havarti, Provolone. |
| Hard cheese | Cheddar, Samsø |
| Hard cheese with holes | Emmental |
| Soft, spreadable fresh cheese | Cream Cheese* |
| Soft, rind less unripened cheese with soft curd granules | Cottage Cheese |
| Unripened, rind less cheese with parallel-oriented fibrous protein structure | Mozzarella |

* We believe that this proposal could help resolving the discussion on the term "cream cheese" in languages other than English. In the labelling section, provisions for the use of the variety name "cream cheese" could be incorporated.

Some specific remarks:

We object to Recommendation no. 38 which allows the use of Natamycin in Mozzarella. The use of Natamycin in mozzarella contradicts the recommendation which foresees that Natamycin should not be present beyond the depth of 5 mm of the cheese rind because the intake of Natamycin is not desired. In the case of Mozzarella, the cheese surface is consumed, therefore Natamycin should not be used to treat the surface of Mozzarella cheese.

We strongly support Recommendation no. 47, as this recommendation makes clear that Natamycin should not be used on the surface of sliced, cut, shredded, or grated cheese.

UNITED STATES

The U.S. supports the horizontal approach in the development of milk and milk product standards whenever possible. The Codex Alimentarius Commission's Procedural Manual recognizes this approach and only allows for deviations from horizontal standards when those deviations are fully justified and supported by available scientific evidence and other relevant information. This includes the food additive and contaminant provisions developed by the Codex Committee on Food Additives and Contaminants, the hygiene provisions developed by the Codex Committee on Food Hygiene, and the labeling provisions established by the Codex Committee on Food Labeling. The U.S. recommends that milk and milk product standards reference the work of these groups to identify additive, contaminant, hygiene and labeling provisions within the standards whenever possible rather than duplicate their work within milk and milk products standards.

The U.S. supports the identification of food additive classes in the standards and recommends that the standards not list additives individually, but rather defer to CCFAC to identify the specific additive provisions included within the classes provided in the standards.

Common Issues Relating To Standards For Individual Cheese Varieties

4. Food Additives

The U.S. recommends that the CCMMP refer the use of pimaricin back to CCFAC to be put on JECFA's priority list for an exposure assessment for its use on shreds and cuts in standards C1, C4, C5, C9, C15 and Mozzarella standard. In addition, we also recommend that this exposure assessment also consider the use of pimaricin when added to Mozzarella cheese during the kneading and stretching process.

The U.S. recommends deletion of sodium nitrate and potassium nitrate from the list of preservatives in standards C3, C4, C5, C6, C7, C9, C11, C13 and C15.

We believe that the public health safety concerns associated with nitrates, such as the formation of nitrosamines in these products, outweigh any technological purpose for the use of nitrates in cheese making.

The U.S. notes that Beta-Apo-8'-Carotenoic Acid, Methyl or Ethyl Ester (INS 160f), Chlorophyll (INS 140), Chlorophylls, Cu-Complexes (INS 141i), and Chlorophyllins, Cu-Complex, Na & K Salts (INS 141ii) are not approved for use in foods sold in the U.S. Foods containing these colors are deemed adulterated when sold in the U.S.

Proposed Draft Revised Standard for Cheddar (C-1)

CANADA

4. Food Additives

Canada supports the addition of INS no.140 Chlorophyll, INS no.101 Riboflavin and INS no.100(ii) Tumeric as Colours. Chlorophyll is listed in the GSFA, Table 3, for general use, CCFAC is reviewing Riboflavin at Step 6, and Tumeric is recognized by JECFA as a colour.

Canada recommends that INS. No 200, 202, 203, 280, 281, 282 be moved from the category of "Surface/Rind treatment only" to the category of "Preservatives" since they are technologically required as preservatives in the whole cheese and have a history of safe use. Canada recommends the maximum level of the preservatives of sorbic acid, potassium sorbate, calcium sorbate, and sodium sorbate to be 3,000 mg/kg of cheese, singly or in combination, calculated as sorbic acid, as it is technologically justifiable and is a good manufacturing practices level.

Appendix

Canada recommends that a sentence be added after the word "cheddared" in 1.2 of the Method of Manufacture. This explanation now exists in the 1966 Cheddar standard and provides a traditional reference for the process of cheddaring. For example, "...the curd is cut into blocks which are turned and progressively piled, keeping the curd warm, which results in the curd becoming compressed, smooth and elastic."

GERMANY

In section 2 "Description", the first sentence of the second paragraph should be as follows:

"For Cheddar ready for consumption, the ripening procedure to develop flavour and body characteristics is normally from 3 months."

In section 3.3 "Composition", the reference level should be set to "45% to 55%".

NEW ZEALAND

Section 3.3, Composition

The proposed reference level for milkfat in dry matter (48-55%) is no longer appropriate for product labelled as Cheddar, without qualification. The range should be extended to account for cheddar cheese that is on the market, some of which is outside the proposed range.

UNITED STATES

2. Description

The U.S. recommends deleting “Gas holes are generally absent, but few splits are acceptable” from the third sentence and revising the sentence to read: “Few openings are acceptable.” Gas holes are considered a defect rather than a characteristic of the cheese.

Proposed Draft Revised Standard for Edam (C-4)

ARGENTINA

2. Description

We think that there is no justification with regard to restricting use of ripening film in the manufacture of rindless Edam Cheese for spherical shape.

We suggest amending last sentence of first paragraph as follows: “All shapes are also sold without ¹ rind”.

GERMANY

In section 2 “Description”, a weight ranging from 0.3 to 20 kg as well as a minimum ripening period of five weeks should be inserted. Accordingly, point 1 of the Appendix is to be deleted.

Proposed Draft Revised Standard for Gouda (C-5)

ARGENTINA

2. Description

We think that there is no justification with regard to restricting use of ripening film in the manufacture of rindless Gouda Cheese for flattened cylinder shape.

We suggest amending last sentence of first paragraph as follows: “All shapes are also sold without rind”.

GERMANY

In section 2 “Description”, a minimum ripening period of five weeks as well as a weight ranging from 0.3 to 30 kg should be established. In the second paragraph of section 2 “Description”, the following clause should be deleted: “**and Gouda of low weights (<2,5 kg)**”.

In section 3.2 “Permitted ingredients”, there should be an additional indent for pepper and caraway because of the traditional use of these spices.

In section 3.3 “Composition”, the reference level for milkfat should be set to 45% to 55%. Footnote 2 on page 22 is to be changed accordingly.

The penultimate sentence (“Gouda...the term “baby””) of section 3.3 “Composition” and, correspondingly, point 1 of the Appendix should be deleted.

Proposed Draft Revised Standard for Havarti (C-6)

GERMANY

In section 2 “Description”, a minimum ripening period of three weeks should be established.

The fourth paragraph of section 7.1 “Name of the food” introduces a special arrangement for “Cream Havarti”. This paragraph should be deleted.

Proposed Draft Revised Standard for Emmental (C-9)

GERMANY

Germany appreciates that a compromise could be found. To prevent this single undertaking from being reopened, Germany refrains from commenting on individual aspects of this agreement.

The milkfat contents in section 3.3 “Composition” were not covered by this single undertaking. With respect to this section, Germany suggests to delete the fat content grade “equal to or above 60% / 67% dry matter content”.

For reasons of clarification, the word “min.” should be inserted both before the propionic acid content and the calcium content values. With respect to propionic acid, the wording should be as follows: “propionic acid * in cheese ready for sale:”.

In point 1 of the Appendix, the word “min.” should be inserted before the two values in the line “weight”.

UNITED STATES

2. Description

The U.S. recommends deleting “but individual countries may on their own territory permit weights from 9 kg and above if the consumer would not be misled with respect to the identity of Emmental” from the third sentence and revising the sentence to read as follows:

“Emmental is typically produced in wheels or blocks that are 40 kg or more, but other weights may be produced, provided that the cheese exhibits similar physical, biochemical, and sensory properties.”

Reference to national legislation has been used by the CCMMP in various standards to address primarily labelling issues. The use of this type of language in the description of a Codex cheese standard is inappropriate.

Proposed Draft Revised Standard for Tilsiter (C-11)

GERMANY

In section 2 “Description”, the minimum ripening period should be set to five weeks and a weight ranging from 1.5 to 20 kg should be indicated.

In section 3.2 “Permitted ingredients”, there should be an additional indent for pepper and caraway because of the traditional use of these spices.

Proposed Draft Revised Standard for Paulin (C-13)

GERMANY

No ripening period has been established so far for this kind of cheese. The ripening period of one week mentioned in section 2 of this draft should therefore be deleted.

The provisions of point 1 and point 3 of the Appendix should also be deleted.

Proposed Draft Revised Standard for Provolone (C-15)

GERMANY

In section 2 “Description”, the minimum ripening period should be set to fifteen days and a weight ranging from 0.3 to 50 kg should be indicated. In the last sentence of the second paragraph of section 2 “Description”, the clause “**and Provolone of low weights (< 2 kg)**” should be deleted.

In section 3.3 “Composition”, the reference level should be set to “40% to 50%”.

Section 3.4 should be deleted.

The Appendix should also be deleted.

UNITED STATES

The U.S. recommends deleting “Gas holes are generally absent” from the third sentence and revising the sentence to read as follows: “Few openings and splits are acceptable.” Gas holes in Provolone cheese are considered a defect rather than a characteristic of the cheese.

Proposed Draft Revised Standard for Cottage Cheese (C-16)

CANADA

4. Food Additives

Since the scope of the standard covers a dry curd cottage cheese and a cottage cheese with a creamy mixture, Canada suggests that the table for food additives include another column to cover the food additives permitted in the “creamy mixture”. We recommend that the permitted additive functional classes be: stabilizers and emulsifiers. Under stabilizers, Canada recommends to add algin (INS 400), calcium carageenan (subcategory of INS #407), sodium cellulose glycolate. Under emulsifiers, Canada recommends to add mono and di-glycerides (INS #471), calcium sulphate (INS #516) and polyoxyethylene (20) sorbitan monoleate; Polysorbate 80 (INS #433). These additives have a history of safe use and are technologically necessary.

7.1 Name of Food

Canada believes that the proposed names for this food are confusing particularly when combined with the qualifiers. Canada recommends that the name of food be “Cottage Cheese” or “Dry Curd Cottage Cheese”, or when a creamy mixture is added, “Creamed Cottage Cheese”. To avoid confusion, the only qualifier should be “Full Fat” for fat enriched products or nutritional claims in accordance with the Guidelines for the Use of Nutritional Claims.

GERMANY

Section 2 “Description” refers to both Codex Standard A-6 and Codex Standard 221-2001. But as the requirements of these standards are not completely the same, the question is how these differences affect the individual C-Standards and how the two standards are related to each other. This question should first be resolved by the Committee on Milk and Milk Products.

In section 7.1 “Name of the food”, the last sentence (“**Suitable qualifiers are ... Volume 1A**”) should be deleted.

UNITED STATES

4. Food Additives

Comment 1

The U.S. notes that there is a conflict between the food additive table and the food additive list. The table does not allow for preservatives, but the food additive list includes 7 preservatives. The U.S. recommends including preservatives in the table as they are technologically justified for use in Cottage cheese to improve quality and safety during shelf life.

Comment 2

The U.S. notes that some additives such as stabilizers and starches could be added to the creaming mixture rather than the cheese mass. The U.S. recommends adding a footnote to the heading in the additive table “cheese mass*.” The footnote would read as follows: “* includes creaming mixture.”

Comment 3

The U.S. recommends including colors for use in cottage cheese, as they are technically justified for use in cottage cheese for whitening the lower fat versions. The U.S. recommends the following color for inclusion in the additive list:

171 Titanium dioxide GMP

Proposed Draft Revised Standard for Coulomniers (C-18)

GERMANY

No ripening period has been established so far for this kind of cheese. The ripening period of ten days mentioned in section 2 “Description” of this draft should therefore be deleted.

In Section 3.4 “Essential sizes and shapes”, the line “weight” should be amended as follows: **“shape/weight: flat cylinder: 300 g – 500 g”**.

Proposed Draft Revised Standard for Cream Cheese (C-31)

ARGENTINA

3.3. Composition

We proposed addressing the minimum content of milk fat in dry matter in 40%.

CANADA

4. Food Additives

Canada recommends the addition of calcium carageenan (subcategory of INS #407), sodium tartrate (INS #335) and sodium potassium tartrate (INS #337) under the category of stabilizers and thickeners and sodium sorbate under the category of preservatives. These are being evaluated by CCFAC, are technologically justified, and have a history of safe use.

GERMANY

The second paragraph of section 1 “Scope” should be deleted.

Section 2 “Description” refers to both Codex Standard A-6 and Codex Standard 221-2001. But as the requirements of these standards are not completely the same, the question is how these differences affect the individual C-Standards and how the two standards are related to each other. This question should first be resolved by the Committee on Milk and Milk Products.

In section 3.3 “Composition”, a minimum fat content in dry matter of 25% is established.

In view of the name “cream”, this value cannot be accepted. The minimum fat content in dry matter should be set to 50%.

The use of nisin is not permitted for unripened cheese in the European Union and is therefore rejected.

In section 7.1 “Name of the food”, the penultimate paragraph should be deleted.

Proposed Draft Revised Standard for Camembert (C-33)

GERMANY

No ripening period has been established so far for this kind of cheese. The ripening period of ten days mentioned in section 2 “Description” of this draft should therefore be deleted.

An additional fat content grade should be inserted in section 3.3. The last line should be changed to **“equal to or above 55% but less than 60%”** and a new line saying **“equal to or above 60% but less than 85%”** should be added. Under “Corresponding minimum dry matter content”, a value of 50% should be added to this new line.

In section 3.4, the line “weight” should be amended as follows: **“shape/weight: flat cylinder (Camembert) or square (Carré du Camembert): approx. 80 g to 500 g.”**

In section 3.5 “Essential ripening procedure”, *Penicillium candidum* should also be allowed.

UNITED STATES

Comment 1

The U.S. recommends deleting “Gas holes are generally absent” from the third sentence and revising the sentence to read as follows: “Few openings and splits are acceptable.” Gas holes in Camembert cheese are considered a defect rather than a characteristic of the cheese.

Comment 2

The U.S. recommends that specific shape requirements in this section either be deleted or moved to the Appendix.

Proposed Draft Revised Standard for Brie (C-34)

GERMANY

No ripening period has been planned so far for section 2 “Description”. The ripening period of ten days which is now mentioned in section 2 “Description” of this draft should be deleted.

In the first indent of section 3.2 “Permitted ingredients”, the words “**and yeast**” should be deleted.

In section 3.3 “Composition”, the last line concerning the fat contents should be as follows: “**equal to or above 60% but less than 85%: 52%**”.

In section 3.4 “Essential sizes and shapes”, the words “**whole cheese of**” should be deleted.

UNITED STATES

Comment 1

The U.S. recommends deleting “Gas holes are generally absent” from the third sentence and revising the sentence to read as follows: “Few openings and splits are acceptable.” Gas holes in Brie cheese are considered a defect rather than a characteristic of the cheese.

Comment 2

The U.S. recommends that specific shape requirements in this section either be deleted or moved to the Appendix.

Proposed Draft Revised Standard for Mozzarella

ARGENTINA

8. Methods of Sampling and Analysis

We suggest deleting the reference to the method for identification of typical “pasta filata” structure by “Confocal Laser Scanning Microscopy” until an international recognized methodology exists to carry out the analysis.

GERMANY

In section 3.3 “Composition”, the values for the minimum dry matter content under “Mozzarella with low moisture” should be replaced with (from top to bottom) 36, 38, 40, 42, 44, 46.

In the third paragraph of section 7.1 “Name of the food”, the clause “describing the true nature of the product” should be deleted.

UNITED STATES

4. Food Additives

Comment 1

The U.S. notes that the maximum moisture levels in the proposed Mozzarella standard are significantly higher than on our domestic market and could mislead the consumer.

Comment 2

The U.S. notes that there is an error on the headings of the table. Both columns are labelled “Mozzarella with high moisture content.” The third and fourth column should have the heading “Mozzarella with low moisture content.”

Comment 3

Footnote 2 for stabilizers and thickeners has been taken from the footnote used in the creams standard and is inconsistent with the technical use in mozzarella cheese.

Comment 4

The U.S. notes that preservatives are technically justified in the surface treatment for both high moisture and low moisture Mozzarella. Column 2 of the table should be revised to indicate this.

IDF's Analysis

GERMANY

The recommendations no. 1 to 70 have already been incorporated into the draft standards. The comments made under 1) and 2) therefore also apply to the relevant recommendations and shall not be repeated here.

With respect to recommendation no. 13 (p. 98), Germany would, however, like to make an additional comment regarding the reference to section 9.3. This reference is to be deleted as there is no such section in the standard.

With respect to recommendation no. 70 (p. 139), Germany would like to comment that it is not necessary to address the "salting procedure" in the Appendices of these two standards.