

codex alimentarius commission



FOOD AND AGRICULTURE
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Agenda Item 4 (d)

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

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PROPOSED DRAFT STANDARD FOR PROCESSED CHEESE COMMENTS AT STEP 3

Comments from: Malaysia, Mexico, Japan and Thailand

MALAYSIA

Malaysia would like to propose the inclusion of “filled milk powders” and “vegetable oil” in the proposed draft standard as indicated in bold and underlined text as follows:

3. ESSENTIAL COMPOSITION

3.1 Raw Materials

a) For Process(ed) Cheese described in Section 2(a):

[For adjustment [both] upwards [and downwards] of the fat content of the final product]: Milk Fat Products*, Butter*, Cream*, [Dairy Spreads*], [Cream Powder*], [Filled Milk Powder], [milk] and [Milk Powders*]

3.2 Permitted ingredients

- vegetable oils

MEXICO

3.2 Permitted Ingredients:

Do not consider starch for inclusion in this section, as it is not permitted for the manufacture of processed cheese under Mexican regulations (it is only permitted for the manufacture of so-called style cheese).

7.1.2 As processed cheese can be called Processed Cheese, according to the variety of cheese, Mexico adopts an indiscriminate position to the point of not clearly defining the percentage breakdown, point 7.1.3 (60% instead of 75%).

JAPAN

Japan would like to submit the following comments on the Proposed Draft Standard for Process(ed) Cheese.

2.DESCRPTION

As the name of a product should provide proper information of the product not to mislead consumers, the product should be composed of cheese as the most important ingredient to name it ‘Process(ed) Cheese’.

Therefore, we propose to insert the following phrase after the word ‘product’ in the chapeau part of the description that was tentatively developed by the Drafting Group.

“,where cheese constitutes the largest single dairy ingredient used as raw material on product basis,”

The section 2 should read as follows:

2. *Description*

Process(ed) Cheeses ~~are~~ is the milk products, where cheese constitutes the largest single dairy ingredient used as raw material on product basis, obtained by:

- a) mixing, melting and emulsifying cheese and the raw materials specified in Section 3.1(a) of this Standard, with the aid of heat and emulsifying salts,
and/or
- b) processing techniques which include melting cheese and the raw materials specified in Section 3.1(b) of this Standard to give an emulsified end-product which has similar physical, chemical and sensory characteristics as the product defined under (a).

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.1a)

Japan is of the opinion that the purpose of addition of milk products should be limited only for adjustment of fat content and quantity of these products should also be limited.

Taking it into account that the section 2.1 and 2.2 of the existing standard (Codex General Standard for Process(ed) Cheese and Spreadable Process(ed) Cheese, CODEX STAN A-8(b)-1978) implies the same idea, we would like to propose to amend 3.1a) as follows.

- a) For Process(ed) Cheese described in Section 2(a):

For adjustment both upwards and downwards of the fat content of the final product: Milk Fat Products*, Butter*, Cream*, Dairy Spreads*, Cream Powder*, Milk and Milk Powder*. These products other than cream, butter and butteroil do not exceed 5% lactose content in the final product.

3.3 Composition

Based on the actual status in Japan, we propose 40% as minimum dry matter content (m/m).

In the case spreadable process(ed) cheese would be included in this standard, we would propose 30% as minimum dry matter content in spreadable process(ed) cheese.

4. FOOD ADDITIVES

As emulsifying agents are not always used in Section 2(b) and the use of certain additives for certain sub-categories of Process(ed) Cheese should be restricted, the necessity for application of a table approach should be further considered.

Use of emulsifiers, stabilizers/thickeners and anticaking agents are authorized in Japan and regarded safe with long history of use and also these additives are essential for producing a certain variety of processed cheeses. Furthermore, the application of these food additives promotes to develop and produce a variety of processed cheeses and contributes to increase of milk products consumption. Consequently, we propose to remove the square brackets on Emulsifiers, Stabilizers/thickeners (for higher moisture and/or low fat Processed Cheese) and anticaking agents (for sliced, shredded, grated and powdered products, only).

Optional ingredients for the purpose of flavouring products are permitted in the existing standard. These ingredients are essential for stable production of process(ed) cheese, as flavors of certain cheese are unstable. Therefore, we propose to add the following two categories of additives in the section 4:

- Flavour enhancers
- Flavouring agents

7.1 Name of the food

7.1.2 4th bullet

Because named variety(ies) cheese(s) is produced in accordance with Section 2(a), and other dairy ingredients except for cheese should be used only for adjustment of the fat content. From the viewpoint of ensuring consumer confidence in the product, use of other dairy ingredients should be limited to a minimum content. Therefore, we propose that other dairy ingredients do not exceed 10%.

7.1.3

As the blend value varies depending on characteristics of final products and cheese varieties used as raw materials, it is not practical to develop minimum ratio (%) of dry matter content in the final products. Therefore, we propose to delete this section.

7.3 Declaration of cheese content

The higher percentage of cheese content in the final products does not necessarily assure the higher quality of the products. However, the declaration of cheese content is likely to mislead consumers the higher is the better and raise excessive competition in dairy market in pursuit of the higher content that is not related to the product quality. Therefore, we propose to delete this section.

To ensure confidence of consumer in process(ed) cheese and avoid misleading consumer, we propose to make difference between denomination of 2(a) and that of 2(b) and insert the following sentence into Section 2 as mentioned above.

“Cheese constitutes the largest single dairy ingredient used as raw material on product basis”.

THAILAND

We would support the context of this code in processing and quantitative declaration the content of cheese for the consumer information and the requirements for the formulation is different in each country.