

codex alimentarius commission



FOOD AND AGRICULTURE
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JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

Agenda Item 4 (q)

CX/MMP 06/7/8 Add. 1
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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON MILK AND MILK PRODUCTS

Seventh Session

Queenstown, New Zealand, 27 March - 1 April 2006

PROPOSED DRAFT STANDARD FOR PROCESSED CHEESE COMMENTS AT STEP 3

Comments from: Argentina, Australia, Japan, New Zealand and Venezuela

General

ARGENTINA

Argentina is pleased to have the possibility of making comments to the present document.

AUSTRALIA

Australia is pleased to provide the following comments on CX/MMP 06/7/8 (Nov 2005) "Proposed Draft Standard for Processed Cheese" and wishes to commend the International Dairy Federation for their efforts in taking the lead in this project.

NEW ZEALAND

New Zealand has been a part of the Working Group that developed this proposal, and thanks the IDF for its leadership that has enabled the Working Group to make significant progress on a difficult standard. We have noted the key points in paragraph 7 on which the working group aimed to get consensus.

New Zealand believes that the somewhat novel approach taken by the WG provides a good basis for solving the remaining issues and making further progress. Obtaining consensus on the concepts proposed would be a major step forward in the development of this standard.

Section 1. Scope

ARGENTINA

Argentina suggests deleting the clarification (1) in the footnotes. To maintain consistency with the other Codex Standards, Argentina considers that it is not necessary to clarify products not covered by the Standard.

NEW ZEALAND

New Zealand supports the proposed text. More specifically we agree with the concept that the standard applies only to those products that are named as 'Processed Cheese'.

Section 2. Description

NEW ZEALAND

New Zealand supports the proposed text. More specifically we agree with the concept that the standard applies only to those products that are named as 'Processed Cheese'.

Section 3. Essential Composition and Quality Factors

Section 3.1 Raw Materials

ARGENTINA

Argentina agrees with the figure stipulated for milk products rich in fat (category b) in point (c), so it suggests deleting the brackets.

In the final paragraph, Argentina suggests stipulating the cheese content at 50% of the ingoing milk products to be able to refer to the variety of cheese in the designation of Processed Cheese.

Argentina considers that in this way it is assured that the cheese constitutes the main category in the end product and, consequently, the relevant component (approximately 75%) of the total cheeses used for its production.

JAPAN

Concerning the sentence "Of the above three categories of raw materials, cheese shall constitute the largest category."

Processed cheese should be composed of cheese as the most important ingredient both on a product weight basis and a dry matter basis because it is a product of cheese.

Therefore, we propose to add the following underlined words after "cheese shall constitute the largest category."

"Of the above three categories of raw materials, cheese shall constitute the largest category on a dry matter basis and a product weight basis."

Reason

1 As the water contents of milk and milk products as raw materials for processed cheese are various, if we adopt "the largest category only on a product weight basis", there will be some cases where cheese does not constitute the largest category on a dry matter basis. This may mislead consumers.

An example is as follows.

	Category of Raw Materials	3.1 a)	3.1 b)	3.1 c)	Total
	Products of raw materials	Cheese	Butter	Skim milk powder	
(1)	Percent(%), product weight basis	34	33	33	100
(2)	Dry matter (%) of the raw material products	55	84	95	
(3)		18.7	27.7	31.4	77.8
(1)×(2)/100					
(4)	Percent(%), dry matter basis	24.0 *	35.6	40.4	100
(3) ×100/77.8					

* The percentage of cheese (24.0%) shows that cheese does not constitute the largest category of the three categories.

- 2 For example, in Japan, approximately 104,000 tonnes of processed cheese was produced in 2004, which is the 5th largest production of the world. Approximately 91,000 tonnes of cheese was used as the raw material for its production. It means that almost all of the raw materials of processed cheese was cheese. In order to ensure this characteristic of processed cheese, cheese should constitute the largest category not only on a product basis but also on a dry matter basis.

NEW ZEALAND

New Zealand supports the concepts in these sections concerning the allowance for a range of combinations of raw materials, the proportion of cheese in the final products, and the limitation on the use of products rich in fat in spreadable processed cheese.

New Zealand recommends that the two paragraphs in 3.1 referring to cheese content should be moved to section 3.3, Composition.

In the case of processed cheese that is required to be qualified as spreadable, the phrase “categories (a) and (b) may, in combination, constitute the largest category” should be deleted, as it does not ensure a significant cheese content. We propose an alternative condition: that category (a), cheese, should be larger than category (c). In addition we recommend that the requirement to label the product as spreadable should be clearly linked to section 7.1.2.

New Zealand can agree with the approach to Named Variety Processed Cheese (NVPC) especially when linked to the provision in Section 7.1.5.

3.2 Permitted Ingredients

ARGENTINA

Argentina agrees with the inclusion of gelatine and starches as permitted ingredients for these milk products, so suggests deleting the square brackets.

NEW ZEALAND

New Zealand supports the concepts in these sections concerning the allowance for a range of combinations of raw materials, the proportion of cheese in the final products, and the limitation on the use of products rich in fat in spreadable processed cheese.

New Zealand recommends that the two paragraphs in 3.1 referring to cheese content should be moved to section 3.3, Composition.

In the case of processed cheese that is required to be qualified as spreadable, the phrase “categories (a) and (b) may, in combination, constitute the largest category” should be deleted, as it does not ensure a significant cheese content. We propose an alternative condition: that category (a), cheese, should be larger than category (c). In addition we recommend that the requirement to label the product as spreadable should be clearly linked to section 7.1.2.

New Zealand can agree with the approach to Named Variety Processed Cheese (NVPC) especially when linked to the provision in Section 7.1.5.

VENEZUELA

Place in the text:	Venezuela suggests:
Page 12 Section 3 Essential Composition and quality factors	Venezuela does not agree to the use of Gelatine and starches as it considers these ingredients affect the quality and identity of the product.

Section 3.3 Composition**AUSTRALIA**

Whilst Australia welcomes the suggested range for MFDM from "none" to 75% because it gives a broader range than the existing Codex standard A-8(b) Codex General Standard for Process(ed) Cheese and Spreadable Process(ed) Cheese (section 5.2 Composition of that standard lists a range of "less than 10" to 65 for MFDM); Australia also believes that there is no need to define an upper limit for MFDM in processed cheese. Furthermore, the Australian dairy industry has advised that there may be currently processed cheeses internationally traded that have an MFDM level higher than 75%; these products would be excluded by an upper limit for MFDM of 75%.

VENEZUELA

Place in the text:	Venezuela suggests:
Page 13 Section 3 Essential Composition and quality factors	The document does not include the fat in dry matter content and permitted food additives, which is considered an important factor for its assessment and making comments.

NEW ZEALAND

New Zealand considers the table approach outlining Fat in Dry Matter bands with corresponding Minimum Dry Matter limits is appropriate. An editorial point is that the table in section 3.3 should show column titles (i.e. Fat in Dry Matter for the first column, and Minimum Dry Matter for the other two). We cannot comment further on this section until the recommendations from IDF have been circulated.

We recommend that this section should be reformatted for clarity, taking into account our recommendations to move the provisions for cheese content and the provision for texture of spreadable processed cheese into this section, as follows:

Section 3.3.1 Cheese content, Section 3.3.1.1 Process(ed) cheese

Of the three categories of raw materials in 3.1, cheese shall constitute the largest category.

Section 3.3.1.2 Process(ed) cheese required to be qualified as spreadable

Alternatively to 3.3.1.1, the following requirements apply:

- Category (a), cheese, shall be larger than category (c)
- The combination of category (a) and (c) materials contain at least [40]% FDM
- The content of milk fat in dry matter in the end product is greater than 50% (m/m)
- The product still complies with Section 2, Description
- The end product has a texture that is suitable for spreading, and
- The end product designation is qualified as "spreadable" as specified in 7.1.2.

Note: Some process(ed) cheeses that do not conform to these requirements may nevertheless be spreadable. Labelling of such process(ed) cheeses is also covered by 7.1.2.

Section 3.3.1.3 Named Variety Process(ed) Cheese

The cheese variety(ies) referenced in the designation of Named Variety(ies) Process(ed) Cheese shall constitute at least [60]% (m/m) of the ingoing milk products.

Section 3.3.2 Milk fat in dry matter (FDM) content

Minimum milk fat content (m/m) in dry matter	Maximum milk fat content (m/m) in dry matter
None	75%

Section 3.3.3 Dry matter content

Depending on the fat in dry matter content according to the table below.

Milk fat content (m/m) in dry matter (FDM)	Minimum dry matter (m/m)	
	<i>Process(ed) Cheese</i>	<i>Process(ed) Cheese required to be qualified as "spreadable"</i>
Equal to or above 30% but less than 50%:	[...]	[...]
Equal to or above 50% but less than 75%:	[...]	[...]
Less than 30%:	[...]	[...]

Section 6. HygieneSection 6.1**ARGENTINA**

In point 6.1, Argentina suggests updating the version of the Recommended International Code of Practice – General Principles of Food Hygiene (CAC/RCP 1-1969, Rev. 4-2003) referred to.

Section 7. Labelling**ARGENTINA**

Argentina suggests updating the version of the Codex General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1-1985, Rev. 2-2003) referred to.

Section 7.1.2.**AUSTRALIA**

Australia believes that the standard should allow for the use of the noun “spread” to be used as an alternative to the qualifier “spreadable”; the consumer will not be misled by the alternative term and the term is already widely used.

NEW ZEALAND

The successful progression of this standard depends to large extent on the clarity of this section, particularly the provisions in section 7.1 concerning the naming and texture of spreadable processed cheese.

We suggest that section 7.1.2 could be made clearer by referring back to the specific section that requires such labelling.

We note that if a Processed Cheese has a spreadable texture, but is outside the composition provisions under which a product must be designated spreadable processed cheese, then the product can (but does not have to be) labelled ‘spreadable’ and the term ‘spreadable’ need not be stated in conjunction with the name “Processed Cheese”. An extra sentence under 7.1.2 would clarify this point.

Section 7.1.2 could then read as follows:

7.1.2 Where section 3.3.1.2 requires the use of the term “spreadable”, the term shall be stated in conjunction with the name “Process(ed) Cheese”.

Where the standard does not require the use of the qualifier 'spreadable', but the product nevertheless has a texture suitable for spreading, the term 'spreadable' may be used and not necessarily in conjunction with the name.

Section 7.1.3

NEW ZEALAND

Section 7.1.3 regarding the texture of spreadable processed cheese, is an essential quality provision, not a labelling provision. We therefore suggest it should be moved to the composition section, alongside other provisions for spreadable processed cheese.

Section 7.1.5 Name of the Food

ARGENTINA

In point 7.1.5., Argentina suggests expressing the percentage of the cheese variety, the name of which is used on the label, as a function of the total milk products instead of the total raw materials to be consistent with point 3.1. of the Standard.

Section 7.4 Declaration of milk protein content

VENEZUELA

Place in the Text:	Where it reads:	It should read:
Page 14 Section 7.4 Declaration of milk protein content	If the consumer would be misled by the omission, the total fat content shall be declared...	If the consumer would be misled by the omission, the total protein content shall be declared...