

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME****CODEX ALIMENTARIUS COMMISSION****35th Session****Rome, Italy, 2-7 July 2012****MATTERS REFERRED TO THE COMMISSION BY CODEX COMMITTEES
AND TASK FORCES****CONSIDERATION OF THE POSSIBILITY OF FURTHER WORK TO DEVELOP STANDARD(S) COVERING
PROCESSED CHEESE****(prepared by the CCMMP and Codex Secretariats)****BACKGROUND**

1. The 34th Session of the Commission agreed to suspend a decision on discontinuation of work on a standard for processed cheese until its next session and requested the Codex Secretariat to prepare, in close consultation with the Chairperson of the Committee on Milk and Milk Products (CCMMP), a Circular Letter to explore the possibility of further work. Accordingly CL 2011/20-CAC/MMP was issued to seek detailed information on trade problems associated with these products and responses to questions on the potential scope, content and technical specifications that might pertain to these products to facilitate further discussion on possible new standards covering processed cheese.

REVIEW OF THE RESPONSES

2. Responses to the CL were received from 21 member countries, 1 member organization and 1 observer organization¹. Annex 1 provides a summary of members' responses to the various questions set out in the circular letter. This paper provides an analysis of the responses to facilitate further consideration of this issue.

Trade Problems

3. The majority of responses (14) indicated there were no significant trade problems either because of diversity of legislation or absence of standards or legislative requirements. Among these respondents were some of the major exporters of processed cheese.

4. Those members (9) that stated that there were problems in international trade in these products cited the following reasons:

- inadequate or incorrect labelling of imported processed cheese, so consumers cannot determine the nature of the product they are purchasing and may be misled by imitation products or products with a low cheese content;
- differing standards in importing countries, leading to increased production costs to produce various formulations, and increased marketing costs;
- lack of standards in importing countries, leading to difficulty obtaining a permit to market the products;

¹ Algeria, Australia, Canada, Colombia, Costa Rica, Cuba, Ecuador, Egypt, European Union, France, Iran, Japan, Kenya, Lithuania, Mexico, New Zealand, Philippines, Poland, Slovak Republic, Switzerland, United States of America, Uruguay, International Dairy Federation. A compilation of comments submitted to CL 2011/20 CAC/MMP, in original language only, is available in electronic format only on the FAO ftp server at the following link: ftp://ftp.fao.org/codex/meetings/CAC/cac35/cac35_10_app2x.pdf

- there are few national standards and no international standard that countries can reference to ensure safety and quality and protect interests of consumers and producers, and for use by enforcement and anti-fraud officials;
- there are differences in requirements, even among countries that subscribe to Codex standards, that prevent marketing;
- products differ in composition; some products do not meet minimum requirements; replacement, or partial replacement, of milk fat by vegetable fat; addition of small quantities of starch as an ingredient;
- lack of reference documentation for sanitary certificates and sales permits.

Should Codex undertake further work to develop a standard (or more than one standard) covering processed cheese?

5. Fourteen of the twenty three members and observer organizations that responded to the circular letter did not support further work to develop a standard, while nine responses supported continuation of work on developing one or more Codex standards for processed cheese. Of these, one suggested it would be useful to document the needs of each region and one supported a regional standard for the Near East.

Basis for standard(s) (scope, content and technical specifications for processed cheese)

6. Respondents who considered Codex should undertake further work to develop standard(s) were asked to provide specific comments or suggestions on the scope, product composition, cheese content, permitted milk products, permitted non-milk products, other permitted ingredients, technical specifications and labelling provisions for each of the products for which an international standard was considered necessary.

7. The responses to this part of the questionnaire ranged from general suggestions for development of standards for processed cheese to more detailed suggestions covering scope, product description and composition. Responses included proposals for specific standards, including processed cheese, pasteurised processed cheese, UHT processed cheese, processed cheese spread, processed cheese preparations, cheese specialities, and analogue processed cheese containing non-dairy ingredients. One response proposed a general standard covering all possible types of processed cheese. Another response suggested standards for different heat treatments.

8. Four responses (Colombia, Costa Rica, Ecuador and Uruguay) offered detailed drafting proposals, for (a) processed cheese or spreadable processed cheese, of one or more varieties, and (b) processed cheese preparations. Costa Rica's proposal was supported by Cuba. Three of the four drafting proposals were based on the revoked standards (CODEX/STAN 285/1978, CODEX/STAN 286/1978, CODEX/STAN 287/1978 with variations).

Further justification for the proposed standards

9. Several countries provided detailed justification for further work. The justifications were that processed cheese production and trade is considerable and is increasing, there is diversity of legislation, and that standard(s) are needed for protection of consumers in terms of health and preventing fraudulent practice, and for fair trade. It was also suggested that the products are a source of milk protein and a standard would be helpful to meet consumer expectations.

Basis for acceptability of the proposed standards

10. Respondents that proposed standards were asked to provide further explanation on what basis the proposed standard(s) may be acceptable internationally, bearing in mind the nature of previous discussions in CCMMP and CAC. Among the explanations offered were:

- lack of resources in countries to develop scientific and technically-based standards;
- guidelines would encourage innovation and new technologies of production, and foster trade and technology sharing;
- the standards would establish the required functional properties, i.e. thermal stability.

ANALYSIS AND CONCLUSIONS

11. A majority of members that responded to the circular letter did not support continuation of work on processed cheese. Most of these members are major producers and exporters of processed cheese and did not identify any major trade problems for these products.

12. The nine countries that supported continuation of work argued that international standards are needed to standardise composition, product descriptions and labelling of these products, assist with development of national standards and facilitate regulation at the border. While the interest of these countries in the development of international standards is understandable it is important to examine these proposals against the following critical considerations:

- whether the problems identified provide a sufficient basis for continuation of work and whether the proposals for new work are consistent with the CAC *Criteria for the Establishment of Work Priorities* with particular reference to the criteria applicable to commodities;
- whether international standard(s) would be the most appropriate means of addressing the problems identified; and
- whether the proposed drafts offer a sound and sufficiently new approach for continuing work on the development of international standards for processed cheese taking into account previous work in CCMMP over a long period of time.

Criteria for the establishment of work priorities and criteria applicable to commodities

13. The information presented by countries calling for the continuation of work on processed cheese was examined against the CAC *Criteria for Establishment of Work Priorities* and the *Guidelines on the Application of the Criteria for the Establishment of Work Priorities (Criteria applicable to commodities)*. The analysis of the responses brought out the following:

Volume of production and consumption and trade

14. Despite the fact that some countries have raised concerns about real or potential barriers to trade in processed cheese, the volume of production and trade in these products have been increasing steadily in all parts of the world and the major producers and exporters of these products have not cited any significant problems in trade. The volume of production and trade is substantial but this may not in itself indicate the need for a standard for the product. Many other processed products are in trade without specific standards and major importers and exporters of processed cheese (Australia, Canada, European Union, Japan, New Zealand and Switzerland) did not identify any specific impediments to trade and saw no need for an international standard(s).

Diversification of national legislation and apparent resultant or potential impediments to international trade

15. The existence of diverse national legislation or the absence of national standards was presented as major reasons for seeking the establishment of international standard for processed cheese. Colombia cited problems in exporting to Ecuador and Peru because of absence of voluntary or mandated standards. Uruguay reported that while processed cheese was able to be traded freely within the MERCOSUR region on the basis of its regional technical regulations covering identity and quality of pasteurised or UHT processed cheese, trade outside this region was impeded by differing national requirements.

16. Notwithstanding the above comments, trade statistics provided by the countries of the Latin American region suggested that trade in processed cheese has grown steadily in recent years. While it is entirely correct that there are differing standards and requirements for processed cheese products in different parts of the world these do not seem to have created any major impediments to international trade in these products as reflected by the trade statistics. The problems associated with diversity of national legislation, or its absence, are unlikely to be overcome through the establishment of international standard(s). Such standard(s) would need to be very broad to accommodate the wide range of products currently in trade and allow for product development and innovation and producers and marketers would still need to formulate products according to the specific needs of their markets. Indeed this approach was one of the options considered by successive CCMMP working groups but failed because of strong national positions on provisions that were closely aligned with their respective national standards.

Amenability of the commodity to standardisation

17. Despite the best efforts of the CCMMP to find consensus over a long period of time the Committee was unable to reach agreement on core components of processed cheese. The specific drafting proposals for standard(s) submitted in response to CL 2011/20-CAC/MMP do not offer any new or viable basis for continuation of work. Three of the proposals are based on the revoked standards. They were revoked because CCMMP analysis had determined that these standards were outdated and not technically sound. For instance they do not make a clear distinction between processed cheese and processed cheese preparations since the cheese content of each product is determined by different means that are not compatible.

18. It is also worth noting that the four proposals that have made specific recommendations on the core components of processed cheese (cheese content, use of specific substances and product description) were the very same components that were the subject of extensive debate in CCMMP working groups over nine meetings spanning a fourteen year period. Among the suggestions were provisions relating to cheese content and use of various substances(such as Starch and Gelatine) in production of processed cheese. These are indeed the very components/areas where the CCMMP was unable to reach international consensus. The proposals also illustrate the diversity of opinions on these products. The latest proposals do not provide any new or viable basis for continuation of work.

19. Calls for development of regional standard(s) would likely face the same issues as development of international standard(s) and raise concerns about potential barriers to international trade in products that are traded globally. This is apparent from the comments of Uruguay, which reported on the existence of differing standards/requirements within the Latin American region. In any case, given the global nature of processed cheese trade, it is questionable if a regional standard for processed cheese will be of particular relevance or value. Members of the Commission hold very divergent views on the value of regional standards as evidenced by the comments of various regional coordinating committees.

20. In the current situation, the development of international standard(s) for processed cheese is unlikely to address the problems identified by respondents. Specific standard(s) for processed cheese would add very little to the protection already offered by existing Codex standards. As far as is known, the revoked standards were adopted by only in a small number of countries and was hardly being used by industry.

Coverage of the main consumer protection and trade issues by existing or proposed general standards

21. A number of existing Codex standards are relevant to processed cheese. The *General Standard for the Use of Dairy Terms* (CODEX STAN 206-1999) and the *General Standard for the Labelling of Prepackaged Foods* (CODEX STAN 1-1985) are relevant to the naming and labelling of the products and the *General Standard for Cheese* (CODEX STAN 283-1978) and standards for specific cheese varieties are relevant to the raw materials. There are other general standards relating to hygiene, food additives, contaminants, methods of analysis and sampling that provide guidance on specific components of processed cheese. In fact these standards apply to processed cheese as well as to a wide range of other processed foods.

Conclusions

22. The proposals submitted in response to the circular letter underscore the same difficulties that were faced by CCMMP during its fourteen years of deliberations on this issue. As noted in para 11 of the Report of last meeting of the Physical Working Group on the Proposed Draft Standard for Processed cheese² *'the fundamental difficulty with attempting to develop this standard arises from the requirement for the standard to address the very large variety of products marketed as processed cheese while retaining scope for innovation.'* The reality is that processed cheese, as we know it, is a generic description for a whole range of products with varying compositional and functional characteristics. The products currently developed and sold in markets around the world have been driven by a combination of traditional practices, consumer tastes and preferences, technological developments and functional characteristics. The wide range of processed cheese products that are sold around the globe illustrate the influence of product innovation and market driven growth. In many ways processed cheese and related products are not very different to the wide range of processed foods that are found in supermarket shelves in different parts of the world. Absence of Codex

² Report of the Physical Working group on the proposed draft standard for processed cheese, CX/MMP 10/9/4, August 2009

standards does not appear to have impeded the production and trade in these products. Consumer health and safety interests in relation to these products are already well covered by existing horizontal standards and there has been little or no need to establish commodity specific standards. Similarly the general standards relating to labelling, product description and nutritional declaration address all the essential matters to support regulation and consumer information at the national level.

23. In conclusion the proposals submitted in response to the circular letter do not provide any new or pragmatic basis for continuation of work on the development of one or more Codex standards for processed cheese. Continuation of work on processed cheese would be hard to justify against the CAC *Criteria for the Establishment of Work Priorities* and the *Criteria applicable to commodities*. There is no international consensus on some of the core components such as the amount of cheese, use of various ingredients such as gelatine and starch, labelling and product description. While the absence of a commodity standard for processed cheese may well be source of difficulty for some importing and exporting countries there is sufficient guidance available to countries through various horizontal standards relating to food hygiene, food labelling, food additives and contaminants to address the core interests relating to product description and consumer information. Absence of specific standards for processed cheese does not raise any food safety concerns. One way to address the legitimate interest of those countries concerned to ensure that processed cheese sold in their markets meet particular requirements (such as minimum protein levels and declaration of dairy and non dairy ingredients) might be through the establishment of specific regulations at the national level.

RECOMMENDATIONS

24. It is recommended that the 35th Session of the Commission note the following conclusions from the latest analysis:

- i. the majority of countries that responded to the circular letter did not identify any major impediments or problems associated with international trade in processed cheese products;
- ii. processed cheese and related products as currently produced and traded internationally represent a diverse range of products with varied compositional and functional characteristics and are not readily amenable to standardisation;
- iii. evaluation of the four specific proposals for developing a Codex standard for processed cheese did not provide any new or viable basis for continuation of work as these included differing suggestions on the core components of processed cheese (cheese content and use of additives and stabilisers) on which the CCMMP was unable to reach consensus over a long period of time;
- iv. existing Codex standards (both generic and general commodity) provide adequate guidance on essential health and safety aspects of these products and labelling for consumer information;
- v. countries have the option of specifying, in national regulations, such compositional requirements as minimum protein levels to address specific nutritional objectives; and
- vi. the responses and specific proposals do not provide any new or pragmatic basis for continuing work on the development of standards for processed cheese.

Summary of responses to CL 2011/20-CAC/MMP – Processed Cheese

1. Name of the member or international organization submitting comments:

Responses were received from 21 members, 1 member organization and 1 observer organization.

Part 1: Detailed information on trade problems associated with trade of processed cheese.

1. Set out details of the trade problems that have arisen, including name of the country, in regard to processed cheese:

	Responding country	Comments
1.	Algeria	Labelling of imported processed cheeses
2.	Australia	PC products are traded freely in international trade. No known problems or impediments to international trade.
3.	Canada	Not aware of any significant problems
4.	Colombia	Problems of marketing in Ecuador and Peru because there is no voluntary standard, legislation, or international reference framework. No problem in Colombia with manufacture and marketing.
5.	Costa Rica	Lack of homogeneous criteria for designation, composition and labelling when trading with Central America, the Caribbean and North America, resulting in reformulation costs for both imported and exported products. This is increasingly relevant as trading volumes have increased in recent years. Imitation processed cheese products are traded in these markets.
6.	Cuba	Having eliminated the Codex standards, Codex is left with no reference standard at the international level.
7.	Ecuador	Ecuador is finalising a national standard based on Codex Stan 286. Codex standards are needed for processed cheese, and similar products. It is in the interests of cheese manufacturers, consumers and national authorities. It is desirable to differentiate between milk-based products and those containing proportions of non-milk ingredients, in order to create fair trading conditions and provide label information so as to avoid misleading consumers.
8.	Egypt	No evidence of any significant problem
9.	EU	No substantial trade problems reported in the EU, for exports or imports
10.	France	No trade problems found in France, for exports or imports
11.	Iran	A – Iran uses feta cheese as the base, price is higher, competition difficult B – Imitation cheese not correctly labelled, customers compare price
12.	Japan	No trade problems confirmed
13.	Kenya	None, but lack of standard(s) is a challenge for local and imported processed cheese.
14.	Lithuania	- - -
15.	Mexico	Not aware of any.
16.	New Zealand	No apparent issues. Consumer protection and fair trade covered by other relevant Codex standards.
17.	Philippines	Not applicable
18.	Poland	No trade problems reported by competent authorities, for both import and export.

	Responding country	Comments
19.	Slovak Republic	No trade problems
20.	Switzerland	No trade problems from lack of a standard. US market requires a food safety notification, but this is not a trade restriction.
21.	Uruguay	Outside MERCOSUR region, manufacturers must adapt formulations and labelling for each country.
22.	USA	Not aware of any problems.
23.	IDF	No evidence of any significant problem.

Provide specific information on situations where diversity of legislation creates problems for trade in processed cheese:

	Responding country	Comments
1.	Algeria	No national legislation for processed cheese. Authorities in charge of monitoring and fraud prevention refer to Codex standards.
2.	Australia	---
3.	Canada	---
4.	Colombia	Few national standards in the region; differences in requirements prevent marketing in the majority of countries that subscribe to Codex standards.
5.	Costa Rica	1. Products differ in composition (fat, protein or moisture content) 2. Some products do not meet minimum requirements, e.g. non-dairy raw materials to replace dairy. 3. No Codex rules that countries can reference for protection of health and interests of consumers and producers.
6.	Cuba	Cuba now has no international standard as reference to ensure safety and quality and protect commercial interests
7.	Ecuador	N/A
8.	Egypt	No evidence of any significant problem
9.	EU	Not aware of situations where diversity of legislation creates problems for trade
10.	France	Do not know of cases where diversity of legislation creates problems for trade
11.	Iran	Variations of formulation and technology affect the product's price. Inadequate labelling means consumers cannot recognize imitation cheese, leading to confusion on price
12.	Japan	No trade problems have been confirmed.
13.	Kenya	None
14.	Lithuania	Products with the same composition have different labelling requirements in different importing countries, e.g. naming, nutrition labelling.
15.	Mexico	Mexico has no official standard. General standards apply – no trade problem.
16.	New Zealand	No apparent issues. Consumer protection and fair trade covered by other relevant Codex standards.

	Responding country	Comments
17.	Philippines	Not applicable
18.	Poland	No trade problems
19.	Slovak Republic	Not aware of trade problems
20.	Switzerland	- - -
21.	Uruguay	Uruguay applies the MERCOSUR standard for processed cheese. Diversity of regulations in importing countries hinders trade as export products must comply with the MERCOSUR standard and that of the importing country. Companies must reformulate according to importing countries' regulations.
22.	USA	Not aware of any international trade problems.
23.	IDF	No evidence of any significant problem.

Provide specific information on situations where absence of legislation has created problems for trade in processed cheese (indicate the name of the country where this situation applies):

	Responding country	Comments
1.	Algeria	Lack of Algerian regulations and Codex standards poses problems for marketing and trade in terms of technical specifications: mainly replacement, or partial replacement, of milk fat by vegetable fat, and addition of small quantities of starch as an ingredient.
2.	Australia	- - -
3.	Canada	- - -
4.	Colombia	Problems of marketing in Ecuador and Peru because there is no voluntary standard, legislation, or international reference framework. No problem in Colombia with manufacture and marketing.
5.	Costa Rica	Products are on the national market not meeting minimum compositional requirements (e.g. use of non-dairy raw materials, fat, protein or moisture content) that are misleading to the consumer and create unfair competition.
6.	Cuba	Pre-marketing permission relies heavily on Codex standards. Without a Codex standard products could be in the market which do not meet requirements.
7.	Ecuador	Absence of legislation has frequently caused problems for manufacturing, importing and marketing cheese products, and for obtaining sanitary certificates and sales permits as there is no reference documentation for safety and identity of the products.
8.	Egypt	No evidence of any significant problem.
9.	EU	Not aware of situations where absence of legislation creates substantial problems.
10.	France	Do not know of cases where absence of legislation would create problems.
11.	Iran	Various formulations and technology, incorrect labelling, and common labelling for all types of processed cheese could affect trade.
12.	Japan	No trade problems confirmed.
13.	Kenya	None, since there is no standard or guideline.
14.	Lithuania	- - -

	Responding country	Comments
15.	Mexico	No identified problem.
16.	New Zealand	No apparent issues. Consumer protection and fair trade covered by other relevant Codex standards.
17.	Philippines	No applicable
18.	Poland	No trade problems reported.
19.	Slovak Republic	Not aware of any problems
20.	Switzerland	- - -
21.	Uruguay	- - -
22.	USA	Unaware of any international trade problems.
23.	IDF	No evidence of any significant problem in international trade.

Part 2: Detailed information on potential scope, content and technical specifications that might pertain to processed cheese

Do you consider that Codex should undertake further work to develop a standard (or more than one standard) covering processed cheese?

	Responding country	Comments
1.	Algeria	Essential to develop standards and specifications so as to protect against fraudulent practices and to strengthen monitoring measures.
2.	Australia	Does not support development of international standard at this time or regional standards. CCMMP employed all means to develop a standard, but could not agree on composition.
3.	Canada	Does not support continued work: lack of consensus and lack of significant problems in trade. CCMMP was unable to resolve fundamental issues. Large variety of products marketed as processed cheese.
4.	Colombia	Yes, resume work on revising the standards for processed cheese and processed cheese preparations
5.	Costa Rica	Yes, two standards are proposed.
6.	Cuba	Codex should undertake new work
7.	Ecuador	Yes. Codex should undertake work on at least 2 technical standards for processed cheese.
8.	Egypt	No. Further work is not likely to be conclusive. Food safety issues covered by horizontal Codex standards. Support the view of CCMMP.
9.	EU	Should not undertake any work to develop standard(s). Consensus was impossible in CCMMP, no problems in international trade, should not waste scarce Codex resources.
10.	France	Should not undertake further work. Consensus was impossible in working group, unlikely in future, no problems in international trade.
11.	Iran	Yes, regional standard could be useful for trade, and need a standard for imitation processed cheese.
12.	Japan	Supports CCMMP decision to discontinue work. Wide varieties of processed cheese

	Responding country	Comments
		in international market, very difficult to develop a comprehensive standard.
13.	Kenya	Yes, one comprehensive standard covering all types of processed cheeses.
14.	Lithuania	Yes
15.	Mexico	Not required, but can document needs of geographic areas.
16.	NZ	No. CCMMP could not agree on important aspects of any potential standard, further work unlikely to be productive.
17.	Philippines	Do not support further work. Diversity of legislation per country, CCMMP could not reach consensus.
18.	Poland	Does not support undertaking further work. CCMMP could not reach consensus, no trade problems. Regional standards discrepant to Codex procedures and might cause barriers to trade.
19.	Slovak Republic	No. No consensus was reachable.
20.	Switzerland	No. CCMMP could not find consensus. No regional standards because it is produced and traded worldwide.
21.	Uruguay	Yes, a standard with different categories according to functionality, flavours and heat treatment. Consider another standard for products with low dairy content using non-dairy ingredients.
22.	USA	No. Supports CCMMP decision to discontinue work and revoke existing standards. Products in trade did not reflect existing standards, nevertheless no known or potential impediments to trade.
23.	IDF	No. CCMMP could not reach agreement, IDF has been closely involved, further work is unlikely to be conclusive, supports view of CCMMP.

If you answered "yes" to Question 5, please complete the following questions 6 to 8:

Outline the basis for each standard you propose by describing:

The scope of the product(s) to be covered (i.e. product name(s) and corresponding description(s), noting whether they contain cheese, other milk products, and non-milk products):

The composition of each of the product(s) (e.g. % fat in dry matter (FDM), % dry matter (DM)):

The amount of cheese in the product(s) and how the cheese content is expressed (i.e. whether expressed on a product weight basis or a dry matter basis):

Permitted milk products:

Permitted non-milk products (e.g. flavouring foods, vegetable oils):

Other permitted ingredients (such as gelatine) and functional classes of food additives:

The technical specifications for each of the product(s):

The labelling provisions specific to each of the product(s):

Ensure that the boundaries between products are clear, including the boundaries with related foods.

	Responding country	Comments
1.	Algeria	Processed cheese, processed cheese spread, processed cheese preparations, cheese specialities. More information will be sent after consulting the national dairy industry.

	Responding country	Comments
2.	Australia	---
3.	Canada	---
4.	Colombia	<i>Drafting proposals provided for:</i> <i>Processed cheese or spreadable processed cheese, of one or more varieties</i> <i>Processed cheese preparations</i>
5.	Costa Rica	<i>Drafting proposals provided for:</i> <i>Processed cheese or spreadable processed cheese, of one or more varieties</i> <i>Processed cheese preparations</i>
6.	Cuba	Supports Costa Rica's proposal. Important to establish clear demarcation between the products, and between them and other similar foods.
7.	Ecuador	<i>Drafting proposals provided for:</i> <i>Processed cheese or spreadable processed cheese, of one or more varieties</i> <i>Processed cheese preparations</i> <i>Based on Codex Stan 286 and 287.</i>
8.	Egypt	---
9.	EU	---
10.	France	---
11.	Iran	Processed cheese (spreadable, sliceable, block) with minimum 51% natural cheese Analogue processed cheese with dairy and non-dairy ingredients Proposed composition
12.	Japan	---
13.	Kenya	General standard with a range of composition and cheese content addressing all possible types of processed cheese. Cheese content on dry matter basis...
14.	Lithuania	---
15.	Mexico	N/A
16.	NZ	---
17.	Philippines	---
18.	Poland	---
19.	Slovak Republic	---
20.	Switzerland	---
21.	Uruguay	<i>Drafting proposal provided for processed cheese, pasteurized processed cheese and UHT processed cheese.</i>
22.	USA	---
23.	IDF	---

Please provide any further justification for each standard you propose, as described in the *Criteria for the Establishment of Work Priorities and the Guidelines on the Application of the Criteria for the Establishment of Work Priorities* (Criteria Applicable to Commodities)³:

	Responding country	Comments
1.	Algeria	---
2.	Australia	---
3.	Canada	---
4.	Colombia	<p>1. Protection of consumers in terms of health and preventing fraudulent practice. The products are a source of milk protein; a standard guarantees this input, avoids misleading consumers with imitation products lacking the protein content, and enables the products to be differentiated. Processed cheese is commonly used in sandwiches and consumption is increasing worldwide.</p> <p>2. Diversity of national legislation (see previous responses)</p> <p>3. There is worldwide trade, within and between regions and within countries. Trade statistics provided.</p> <p>4. Full commodity standards are needed for processed cheese and processed cheese preparations, to standardise trade and marketing, and thus facilitate trade.</p>
5.	Costa Rica	<p>The Codex Alimentarius constitutes the basis of food legislation in Latin America and the Caribbean. This guarantees that standards do not create obstacles to trade, are technically justified and are a reference point in cases of trade dispute. When negotiating trade agreements with countries outside the region there might be no international framework for protecting health and consumer interests.</p> <p>In terms of the criteria for future work:</p> <ul style="list-style-type: none"> a) Cheese production is considerable and is increasing b) There is no international coherence of national legislation on processed cheese, nor agreement among the main producers c) There are substantial and increasing trade volumes in processed cheese in the region d) The volume of production and trade justifies standardisation relating to quality and labelling e) The existing Codex standards have been revoked; a standard is required for consumers and fair trade f) No other international work is known. <p>A standard would be consistent with Codex strategic objectives.</p>
6.	Cuba	Supports Costa Rica
7.	Ecuador	N/A
8.	Egypt	---
9.	EU	No potential impediment to trade has ever been substantiated
10.	France	---
11.	Iran	---
12.	Japan	---

³ Codex Procedural Manual, 20th edition, pages 40-43 (English version).

	Responding country	Comments
13.	Kenya	The product is already traded internationally
14.	Lithuania	---
15.	Mexico	N/A
16.	NZ	---
17.	Philippines	---
18.	Poland	---
19.	Slovak Republic	---
20.	Switzerland	---
21.	Uruguay	Important to have a standard to defend the authenticity of a product that has cheese and dairy products as main ingredients, and distinguish from products with low milk content or where dairy content has been substituted by non-dairy ingredients. Consider drafting another standard for products with low dairy content that permits non-dairy ingredients; differentiation is fundamental to avoid misleading consumers.
22.	USA	---
23.	IDF	---

Please explain, in your view, on what basis the proposed standard(s) may be acceptable internationally, bearing in mind the nature of previous discussions in CCMMP and CAC:

4	Colombia	In countries without standards manufacture and trade of processed cheese may wither away, and trade within and between regions would deteriorate.
5	Costa Rica	The revocation of the Codex standards leads to a scientific and legal vacuum in countries that base themselves on Codex standards. Such countries lack resources to develop scientific and technically-based standards; consumer health may be jeopardised or they may be misled; there may be technical barriers to trade. Therefore guidelines should be established for this type of cheese, encouraging innovation and new technologies of production, and that foster trade and technology sharing.
6	Cuba	Supports Costa Rica.
7	Ecuador	The two proposed standards avoid overlapping product definitions. The proposed minimum cheese content defines the identity of the product, without excluding the compositional requirements for functionality, i.e. stability of solid-liquid phases during thermal exposure, and differentiates processed cheese and a cheese-based preparation.
21	Uruguay	A Codex reference would overcome the existing disparity of criteria between countries. It would clearly differentiate processed cheeses with a high dairy content from those without. This would facilitate transparent trade.