



**TO:** Codex Contact Points  
Interested International Organizations

**FROM:** Secretariat, Codex Alimentarius Commission  
Joint FAO/WHO Food Standards Programme  
Viale delle Terme di Caracalla, 00153 Rome, Italy

**SUBJECT:** **Request for Comments at Step 5: Proposed Draft General Standard for Processed Cheese (CCMMP)**

**DEADLINE:** **19 June 2015**

<b>COMMENTS:</b>	<b>To:</b> Secretariat Joint FAO/WHO Food Standards Programme Viale delle Terme di Caracalla 00153 Rome, Italy email : <a href="mailto:codex@fao.org">codex@fao.org</a>	<b>Copy to:</b> Codex Contact Point for New Zealand Ministry for Primary Industries Wellington New Zealand email: <a href="mailto:CodexNZ@mpi.govt.nz">CodexNZ@mpi.govt.nz</a>
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## BACKGROUND

1. The 37<sup>th</sup> session of the Codex Alimentarius Commission agreed to start new work on a general standard for processed cheese along the lines set out in the project document<sup>1</sup> and to reactivate the Codex Committee on Milk and Milk Products (CCMMP) to initially work by correspondence. The Commission also agreed to establish a Physical Working Group (PWG), led by New Zealand and co-chaired by Uruguay and working in English and Spanish, to prepare a proposed draft general standard for processed cheese.
2. The proposed draft standard, prepared by the PWG, was circulated for comments at Step 3 as CL 2015/2-MMP in February 2015.
3. New Zealand, as the Chair of CCMMP, prepared a revised Proposed Draft Standard (Annex 1) on the basis of the comments received in response to CL 2015/2-MMP. A report prepared by New Zealand including the analysis of the comments received is in Annex 2.

## REQUEST FOR COMMENTS

4. Comments at Step 5 on the Proposed Draft General Standard for Processed Cheese (Annex 1).
5. Governments and international organizations wishing to provide comments should do so as directed above before **19 June 2015**. Comments should be in accordance with the general guidance for the provision of comments (Annex 3).

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<sup>1</sup> CX/CAC 14/37/10 Add.1.

**PROPOSED DRAFT GENERAL STANDARD FOR PROCESSED CHEESE  
(AT STEP 5)**

**1. SCOPE**

This Standard applies to processed cheese, including named-variety processed cheese, intended for direct consumption or further processing, in conformity with the description in Section 2 of this Standard.

This standard does not apply to products similar in nature and named as, for example, processed cheese preparations, processed cheese spreads and processed cheese food.

**2. DESCRIPTION**

**Processed cheeses**<sup>1</sup> are the milk products obtained

- (i) from cheese as described in CODEX STAN 283-1978, with or without the addition of other raw materials and permitted ingredients,
- (ii) by melting and emulsifying the mixture,
- (iii) with the aid of heat and emulsifying (or melting) salts in a well-mixed medium<sup>2</sup>, to produce a homogeneous, smooth and stable oil-in-water emulsion.

Named-variety (ies) processed cheeses are processed cheeses, as defined above, characterized by the use in their manufacture of one or more recognized varieties of cheese, and a reference to these in their designation.

**3. ESSENTIAL COMPOSITION AND QUALITY FACTORS****3.1 Raw materials**

- a. Cheese\*;
- b. Milk products rich in fat (e.g. butter\*, butteroil\*, ghee\*, cream\*, cream powder\*);
- c. Milk and milk products other than the above (e.g. milk concentrates, buttermilk, milk powders\*, milk proteins, whey powders\*, lactose\*).

\* For further details, see relevant Codex standards.

The use of these raw materials shall be in conformance with Section 3.3.

**3.2 Permitted ingredients**

- Sodium chloride, and potassium chloride as a salt substitute;
- Water;
- Safe and suitable processing aids;
- Vinegar;
- Lemon juice;
- Cultures of harmless bacteria and enzymes;
- Nutrients where allowed in accordance with the *General Principles for the Addition of Essential Nutrients to Foods* (CAC/GL 9-1987).

**3.3 Composition**

Cheese should be the single largest ingredient of the raw materials described in 3.1 on a dry matter basis.

**4. FOOD ADDITIVES**

Only those functional classes indicated in the table below may be used for the product categories specified. Within each class, and where permitted according to the table, only those individual additives listed may be used and only within the limits specified. The list of additives will be developed.

<sup>1</sup> Varying the processing technology and composition will result in different textures from spreadable, semi-solid to sliceable.

<sup>2</sup> It is recognized that emulsifying salts do not function directly as emulsifiers.

<b>Functional Class</b>	<b>Processed Cheese</b>	<b>Processed Cheese with ≤25% DM and &lt;30% FDM</b>
Colours	X	X
Emulsifying Salts	X	X
Acidity Regulators	X	X
Preservatives	X	X
Emulsifiers	X	X
Stabilizers	X <sup>1</sup>	X <sup>1</sup>
Thickeners	X	X
Anticaking Agents	X <sup>2</sup>	-

<sup>(1)</sup> Usage to be in compliance with the definition of milk product (2.2 of the *General Standard for Use of Dairy Terms* (CODEX STAN 206-1999)).

<sup>(2)</sup> For the surface treatment of sliced and shredded products, only.

## 5. CONTAMINANTS

The products covered by this Standard shall comply with the Maximum Levels for contaminants that are specified for the products in the *General Standard for Contaminants and Toxins in Food and Feed* (CODEX STAN 193-1995).

The milk used in the manufacture of the products covered by this Standard should comply with the maximum levels for contaminants and toxins specified for milk by the *General Standard for Contaminants and Toxins in Food and Feed* (CODEX STAN 193-1995) and with the maximum residue limits for veterinary drug residues and pesticides established for milk by the Codex Alimentarius Commission.

## 6. HYGIENE

It is recommended that the products covered by the provisions of this standard be prepared and handled in accordance with the appropriate sections of the *General Principles of Food Hygiene* (CAC/RCP 1-1969), the *Code of Hygienic Practice for Milk and Milk Products* (CAC/RCP 57-2004) and other relevant Codex texts such as Codes of Hygienic Practice and Codes of Practice. The products should comply with any microbiological criteria established in accordance with the *Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods* (CAC/GL 21-1997).

## 7. LABELLING

In addition to the provisions of the *General Standard for the Labelling of Prepackaged Foods* (CODEX STAN 1-1985) and the *General Standard for the Use of Dairy Terms* (CODEX STAN 206-1999), the following specific provisions apply:

### 7.1 Name of the food

7.1.1 The name of the food shall be "Process(ed) Cheese".

In addition, appropriate qualifiers describing the fat content may be used in line with the *Guidelines for Use of Nutrition and Health Claims* (CAC/GL 23-1997).

7.1.2 The name of named variety (ies) processed cheese shall be Process(ed) \_\_\_\_\_ Cheese, the blank being filled with the variety name(s), as appropriate in the country of sale.

7.1.3 Use of nutrition claims such as reduced fat can be part of the designation and shall be in line with the *Guidelines for the Use of Nutrition and Health Claims* (CAC/GL 23-1997).

### 7.2 Declaration of milk fat content

The milk fat content shall be declared in a manner found acceptable in the country of sale to the final consumer, either (i) as a percentage by mass, (ii) as a percentage of fat in dry matter, or (iii) in grams per serving as quantified in the label provided that the number of servings is stated.

### 7.3 Declaration of cheese content

If the consumer would be misled by the omission, the ingoing percentage of cheese in the formulation (m/m) shall be declared.

**7.4 Declaration of milk protein content**

If the consumer would be misled by the omission, the milk protein content shall be declared in a manner acceptable in the country of sale to the final consumer, either as (i) a percentage by mass, or (ii) grams per serving as quantified in the label provided the number of servings is stated.

**7.5 Labelling of non-retail containers**

Information required in Section 7 of this Standard and Sections 4.1 to 4.8 of the *General Standard for the Labelling of Prepackaged Foods* (CODEX STAN 1-1985), and, if necessary, storage instructions, shall be given either on the container or in accompanying documents, except that the name of the product, lot identification, and the name and the address of the manufacturer or packer shall appear on the container, and in the absence of such a container on the processed cheeses themselves. However, lot identification, and the name and address of the manufacturer or packer may be replaced by an identification mark, provided that such a mark is clearly identifiable with the accompanying documents.

**8. METHODS OF ANALYSIS AND SAMPLING (TO BE DEVELOPED)****8.1 Methods of analysis****8.2 Methods of sampling**

**Annex 2****Report and Recommendations Arising from CL 2015/2-MMP: Proposed Draft General Standard For Processed Cheese**

1. The 37<sup>th</sup> session of the Codex Alimentarius Commission (CAC) agreed to start new work on a standard for processed cheese along the lines set out in the project document. The Commission further agreed to reactivate the Codex Committee on Milk and Milk Products (CCMMP) and initially work by correspondence. The Commission also agreed to establish a Physical Working Group (PWG) led by New Zealand and co-chaired by Uruguay and working in English and Spanish to prepare a proposed draft standard for processed cheese. A proposed draft standard prepared by the PWG was circulated as CL 2015/2-MMP, Request for Comments at Step 3: Proposed Draft Standard for Processed Cheese.
2. This report summarizes and evaluates the comments received in response to the Circular Letter.
3. Comments were received from Argentina, Australia, Canada, Colombia, Costa Rica, Cuba, Czech Republic, Denmark, Dominican Republic, European Union, France, Germany, Hungary, Italy, Japan, Kenya, Mexico, New Zealand, Peru, Philippines, Slovak Republic, Switzerland, United Kingdom, United States and Uruguay (24 member countries and 1 member organization).<sup>1</sup>

**General comments**

4. Of the general comments received a great majority of countries appreciated the work of the PWG and the progress that was made in drafting a revised standard. Some of these expressed agreement with the approach taken in the proposed draft standard, while some suggested a change of direction. One suggested that the standard should be broader in scope, while another suggested the standard should focus on one group of processed cheese. One country anticipated a further working group meeting.
5. Other countries noted the controversial nature of the work and expressed concern at lack of progress on contentious issues (in particular cheese content) and considered that agreement seems unlikely. It was also noted that there are no trade issues, and that a standard might create restrictions or impediments to trade. Some of these countries considered work should cease, or should be discontinued if agreement cannot be reached within a suitable timeframe. Some countries therefore did not provide specific comments on the proposed draft standard.
6. The level of participation in the Physical Working Group and the number of responses to the circular letter indicate a continuing high level of interest in the work. There is continuing positive input and willingness to find solutions.
7. While acknowledging the views of those countries that have questioned the relative value of continuing work, the deliberations on this issue have been guided by the decision of the 37<sup>th</sup> session of the CAC which was to ask CCMMP to start work on developing a General Standard for Processed Cheese along the lines set out in the Project Document<sup>2</sup>. It is therefore proposed that efforts continue on the development of an international standard for processed cheese.

**Progress with development of proposed draft standard**

8. The proposed draft standard is based on the discussions at the PWG and analysis of responses to CL 2015/2-MMP and reflects significant progress on previous efforts. In particular progress was made in the following areas:
  - Greater clarity around scope and description of processed cheese and exclusion of products such as processed cheese preparations, processed cheese spreads and processed cheese food from the scope of the standard;
  - Explicit recognition that *'varying the processing technology and composition will result in different textures from spreadable, semi-solid to sliceable'* (see footnote 1 of the Proposed draft standard);
  - Broad agreement that the use of Gelatine was not technologically justified in products falling under the proposed definition of processed cheese;
  - Agreement to consider provisions for the use of modified starches in the food additive section;
  - Allow the use of stabilizers and thickeners in both categories of processed cheese in the food additives section of the proposed draft standard;
  - The standard covers only plain processed cheese; reference to the *General Standard for the Use of Dairy Terms* in the labelling section of the proposed draft standard adequately addresses the use of flavouring substances such as spices;

<sup>1</sup> Copy of the comments received are available on <ftp://ftp.fao.org/Codex/Meetings/CCMMP/CCMMP10/>

<sup>2</sup> CX/CAC 14/37/10 Add.1

- Simplified provision relating to labelling of named variety processed cheese; and
- Inclusion of a specific provision in the labelling section that provides for the declaration of the ingoing percentage of cheese in the formulation if the consumer would be misled by its omission.

### Minimum cheese content

9. There is however no consensus on the issue of minimum cheese content. The report of the Physical Working Group and the comments to the circular letter point to continuing differences of opinion among members and it is therefore neither appropriate nor possible to include a specific minimum cheese content figure in the proposed draft standard. There does, however, seem to be support for retaining the statement that 'cheese shall be the single largest ingredient of the raw materials described in 3.1 on a dry matter basis'.

### List of amendments

10. Taking into account the outcome of the PWG and analysis of comments to CL 2015/2-MMP the proposed draft standard has been amended as follows:

- Remove the square brackets from footnotes 2 and 3 and insert the word "spreadable" in footnote 2.
- Correct the footnote numbering (i.e. footnote 2 becomes footnote 1).
- Revise section 2 indent (i) to read, "from cheese as described in CODEX STAN 283-1978, with or without the addition of other raw materials and permitted ingredients."
- Delete footnote 4, "The cheese must maintain intrinsic components."
- Add an asterisk to the note following 3.1c to read, "\* For further details, see relevant Codex standards."
- Delete footnote 5, "It is recognized that flavouring ingredients and/or other characterizing ingredients may be added in accordance with section 4.5 of the *General Standard for Use of Dairy Terms* (CODEX STAN 206-1999)."
- Amend section 3.3 Composition to read, "Cheese should be the single largest ingredient of the raw materials described in 3.1 on a dry matter basis," and delete the remainder of the wording in section 3.3.
- In the table of functional classes permitted in processed cheese, remove the square brackets from the figures for maximum dry matter (DM) and fat in dry matter (FDM) in the header of the third column, permit stabilizers and thickeners in both categories of processed cheese, and delete note 3 following the table.
- Amend the second paragraph of 7.1.1 to read, "In addition, appropriate qualifiers describing the fat content may be used in line with the *Guidelines for Use of Nutrition and Health Claims* (CAC/GL 23-1997)."
- Amend 7.1.2 to read, "The name of named variety (ies) processed cheese shall be Process(ed) \_\_\_\_\_ Cheese, the blank being filled with the variety name(s), as appropriate in the country of sale."
- In 7.1.3 delete the sentence, "For the purpose of nutrient comparative claims, the minimum fat content of [40%] fat in dry matter constitutes the reference."

### Issues for further consideration

11. The following issues will need further consideration:

- Develop lists of appropriate additives in the permitted functional classes, with maximum levels, paying particular attention to the technological justification for colours, emulsifiers, stabilizers and thickeners. It is suggested that this work is progressed with the assistance of the International Dairy Federation (IDF) and submitted to the Committee on Food Additives for endorsement.
- Develop methods of analysis and sampling, noting countries' views. It is suggested that this work is progressed with the assistance of the International Dairy Federation (IDF) and submitted to the Committee on Methods of Analysis and Sampling for endorsement.
- Consider the name 'Queso processado' as an alternative to 'Queso Fundido' and the terms 'rebanable' or 'tajable' as replacements for 'feteable', based on comments from Spanish speaking countries.

### Overall conclusions and recommendations

12. While differences remain among members on several elements of the proposed draft standard particularly with regard to the issue of specifying a minimum cheese content, it is possible to conclude that substantive progress has been made in many areas and that the proposed draft standard provides a possible basis for further consideration and advancement.

13. Given that the CCMMP is working by correspondence, New Zealand as the Chair of CCMMP, noting the good progress that was made at the Physical Working Group meeting held in January 2015 and the two main areas where further work is needed relate to the sections dealing with food additives and methods of analysis, proposes to advance the Proposed Draft Standard for Processed Cheese to Step 5 and recommends that the Commission:

- Adopt the Proposed draft General Standard for Processed cheese at Step 5; and
- Agree that the CCMMP should continue to work by electronic means on the remaining sections and submit a revised draft standard for final adoption at the 39<sup>th</sup> session of the CAC.

**Annex 3****GENERAL GUIDANCE FOR THE PROVISION OF COMMENTS**

In order to facilitate the compilation and prepare a more useful comments' document, Members and Observers, which are not yet doing so, are requested to provide their comments under the following headings:

- (i) General Comments
- (ii) Specific Comments

Specific comments should include a reference to the relevant section and/or paragraph of the document that the comments refer to.

When changes are proposed to specific paragraphs, Members and Observers are requested to provide their proposal for amendments accompanied by the related rationale. New texts should be presented in underlined/bold font and deletion in ~~strikethrough font~~.

In order to facilitate the work of the Secretariats to compile comments, Members and Observers are requested to refrain from using colour font/shading as documents are printed in black and white and from using track change mode, which might be lost when comments are copied/pasted into a consolidated document.

In order to reduce the translation work and save paper, Members and Observers are requested not to reproduce the complete document but only those parts of the texts for which any change and/or amendments is proposed.