

# codex alimentarius commission



FOOD AND AGRICULTURE  
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**Agenda Item 4 (d)**

**CX/MMP 02/9  
March 2002**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

### **CODEX COMMITTEE ON MILK AND MILK PRODUCTS**

#### **Fifth Session**

**Wellington, New Zealand, 8-12 April 2002**

#### **PROCESSED CHEESE (MINIMUM CHEESE CONTENT)**

#### **COMMENTS SUBMITTED IN RESPONSE TO CL 2001/20-MMP**

(Prepared by France, United States of America, and International Dairy Federation)

The following comments were received from: Argentina, Austria, Canada, Croatia, Czech Republic, France, Germany, Hungary, Ireland, Malaysia, Netherlands, New Zealand, Poland, Romania, Slovak Republic, Spain, Switzerland, United Kingdom, United States, and Uruguay.

**Question 1: Do your national regulations set a minimum cheese content requirement:****a) For processed cheese?**

Country	As a figure?	What is the minimum?	National legislation	In another manner?	Please explain the approach that establishes minimum cheese content	National legislation
Argentina	No	-	Argentine Food Code. Res. MERCOSUR N°134/96	Yes	The definition fixes that cheese must constitute the main ingredient Within dairy ingredients. Non dairy ingredients must not be present in a quantity higher than 30% of the end product.	Argentine Food Code. Res. MERCOSUR N°134/96
Austria	No			Yes	75% of the dry matter of the finished product has to be dry matter from cheese incl. Milk-fat.	Austrian Foodstuffs Code B32, Processed Cheese I, par. 1; Chapter B:32 (see footnote X)
Canada	Yes – for Processed Cheese Food and Processed Cheese Spread	Not less than 51% cheese	See comments	No	-	-
Croatia	No		Regulations on the quality of milk, dairy products, rennet and pure cultures (Sluzbeni List SFRJ 51/82, 27 August 1982	No		
Czech Republic	Yes	51% m/m	Decree of Ministry for Agriculture Nr. 328/1997 and Nr. 347/1999	Yes	Maximum 5% m/m lactose in product	-
France	No	-	See comments	No	See comments	-
Germany	No	-	-	Yes : 100%	No ingredients other than cheese allowed (with the exception of emulsifying salts)	Cheese Regulations §1 IV No. j
Hungary	No			Yes	See comments	ME 2-51/12/12

Ireland	No	-	-	No	-	-
Malaysia	Yes	Not less than 51% of dry matter derived fr. cheese	Regulation 101 (2), Food Regulations 1985.	-	-	-
Netherlands	No	-	No national legislation on a minimum cheese content	Yes	By common understanding it shall be at least 50% on cheese basis	-
New Zealand	No	The AUS/NZL Food Standards Code does not set a minimum cheese content (see also comments)	Australia New Zealand Food Standards Code	-	-	-
Poland	No	GMP	-	No	-	-
Romania	No	There are no legal fixed levels. The cheese is an component like other milk ingredients as the butter and cream	Professional Standard SP 1649-2000			
Slovak Republic	Yes	80%	Food Codex of the Slovak Republic, Chapter 6	No		
Spain	No	-	Annex 2 of the order of 29 November 1985, the standard for cheeses and processed cheeses (B.O.E 06.12.85)	No	-	Annex 2 of the order of 29 November 1985, the standard for cheeses and processed cheeses (B.O.E 06.12.85)
Switzerland	Yes	At least 80% m/m of the dry matter of the end product must be derived from the dry matter of cheese	LMV art.85 para 2.	No		

United Kingdom	No	See comments		See comments		
United States of America	No	-	See comments	Yes	See comments	Code of Federal Regulations, Title 21, Part 133.169
Uruguay	No	-	-	No	-	-

### **Comments**

#### **Canada**

Both contained in the Canadian Food and Drug Regulations (FDR) (B.08.041.1 and B08.041.3) and the Dairy Products Regulations (DPR) (Section 38 and 40).

#### **France**

Decree 88-1206 of 30 December 1988 – “Decree implementing the Law of 1 August 1905 on fraud and passing off in relation to products and services and the Law of 2 July 1935 organising and rationalising the dairy market with respect to cheese”.

The text of the French regulations does not specify any specific quantity in numerical terms. Cheese is one ingredient among other dairy ingredients such as butter and cream. The Decree does impose minimum milk solid and milk fat content levels.

#### **Hungary**

Indirect regulations for processed cheese: the product can be made from cheeses with addition of water and milkfat necessary to adjust the fat content and also of other milk products. Quantity of the later can be only so much, that lactose content of the final product must not exceed 5% (m/m).

#### **New Zealand**

Standard 2.5.4 of the Code specifies that processed cheese must be made from cheese and products obtained from milk. In addition, any food labelled “processed cheese” would be interpreted as containing cheese as a “characterising ingredient”, the percentage content of which must be declared on the label (Standard 1.2.10). Finally, under fair trading law in New Zealand, it would be considered misleading or false labelling for a food labelled “processed cheese” not to contain any cheese, so there is a de facto requirement for some cheese content. The legal requirement for percentage labelling means that consumers can use this information to choose the product with their preferred cheese content.

For your reference, these Standards are available on the Internet:

- Standard 1.2.10: <http://www.anzfa.gov.au/foodstandards/foodstandardscodecontents/standard12/standard1210.cfm>
- Standard 2.5.4: [http://www.anzfa.gov.au/foodstandards/foodstandardscodecontents/standard25.cfm#\\_cheese](http://www.anzfa.gov.au/foodstandards/foodstandardscodecontents/standard25.cfm#_cheese)

#### **United Kingdom**

There are no UK regulations setting minimum levels for the cheese content of these products.

Processed cheese and processed cheese preparations, such as processed cheese spreads, which are sold in the UK are covered by the general provisions of the UK Food Labelling Regulations 1996. Such products would be expected to quantitatively declare their cheese content.

### United States of America

The United States manufactures a large volume of process cheese. By national legislation, the complete name of this product includes information concerning the variety of cheese used in its manufacture and detailed information is included in our answer to Question 1.c. A majority of the process cheese manufactured in the United States is named Pasteurized Process American Cheese. This indicates that American type cheeses (Cheddar, Colby, etc.) were used in its manufacture. While this would suggest that Pasteurized Process American Cheese is a named variety, we wish to make our position clearly understood and therefore are also responding to Question 1.a.

In the United States, standards establish the minimum cheese content for processed cheese and rely on compositional analysis of fat and moisture to ensure that the standards are met. To accomplish this, the standards limit the amount of ingredients other than cheese that may be used in processed cheese. The composition of the natural cheese used can influence the amount of cheese, however, in every instance at least 85% of the processed cheese is natural cheese (s). In addition, the type (s) of cheese used as raw materials is specified and certain varieties of cheese are not permitted as the cheese ingredient.

#### **b) For processed cheese preparations?**

Country	As a figure?	What is the minimum?	National legislation	In another manner?	Please explain the approach that establishes minimum cheese content	National legislation
Argentina	No	-	This product is not regulated by our National Legislation	No	-	-
Austria	No			Yes	51% of the dry matter of the finished product has to be dry matter from cheese incl. milk-fat	Austrian Foodstuffs Code B32, Processed Cheese, par. 4.1
Canada*						
Croatia	No			No		
Czech Republic	Yes	51% m/m	Decreets Nr. 328/1997, 347/1999	Yes	51% m/m	-
France	No	-	-	No	-	-
Germany	Yes	50% of the final product	Cheese Regulations, § 4 II sentence 2	-	-	-
Hungary	No	51% (m/m)%	ME 2-51/12/12	No		
Ireland	No	-	-	No	-	-
Malaysia	No	-	-	-	-	-
Netherlands	No	-	-	No	But from industry they support a minimum cheese content of 20%	-
New Zealand	No - see comments under 1a)	-	Australia New Zealand Food Standards Code			

Poland	No	GMP	-	No	-	-
Romania	No					
Slovak Republic	No			No		
Spain (see comment * at the last section)	-	-	-	-	-	-
Switzerland	Yes	At least 51% m/m of the dry matter of the end product must be derived from the dry matter of cheese	LMV Art 87 para 1 lett.a.	No		
United Kingdom	No	See comments under 1a				
United States of America	Yes	51%	See comments	No		
Uruguay	Not as a figure	Not in another way				

### **Comments**

#### **Canada**

There are no national compositional standards for such preparations nor are they known to be manufactured in Canada. These products are regulated as unstandardized foods under the Food and Drug Regulations.

#### **United States of America**

U.S. legislation establishes standards for processed cheese preparations with lower cheese contents. These preparations are identified as “process cheese food” and “process cheese spread” and national regulations covering these process cheeses are included in the Code of Federal Regulations, Title 21, Parts 133.173 and 133.179.

**c) In processed cheese bearing a variety name?**

Country	As a figure?	What is the minimum?	National legislation	In another manner?	Please explain the approach that establishes minimum cheese content	National legislation
Argentina	Yes	75% of the variety in the cheese blend used as ingredient	Argentine Food Code. Res. MERCOSUR N°134/96	No	-	-
Austria	Yes *	75% of th named cheese	Austrian Foodstuffs code B32, Processed Cheese I, par. 2	No		
Canada	Yes – for Processed (naming the variety) Cheese	No	-	Yes	See comments	The same regulations as question 1A, under sections B.08.040 (FDR) and Section 36 (DPR)
Croatia	Yes	Minimum cheese content for processed cheese is established only for processed cheese labeled using specific type of cheese. Such type of processed cheese must contain minimum <u>75%</u> of type of cheese mentioned in label.	Regulations on the quality of milk, dairy products, rennet and pure cultures (Sluzbeni List Gaz. SFRJ 51/82, 27 August 1982, and Regulations prom. in Narodne Novine 55/92	No		
Czech Republic	Yes <sup>1</sup>	51% m/m	Decrees Nr. 328/1997, 347/1999	Yes	See over	-
France	Yes	50% of the fats used	Cf. Decree 88-1206 of 30 December 1988.	No	-	-
Germany	No	-	-	Yes 100%	The general requirements for processed cheese apply (- 100%) as well as the	§17 Cheese Regulations, §17 No. 5 Foodstuffs and Consumer Goods Law
Hungary	No			Yes	See comments	ME 2-51/12/11

<sup>1</sup> Ingredients: cheese of type name, butter, milk fat or cream are allowed for standardization only. Any other milk ingredients are not allowed.

Ireland	No	-	-	Yes	Reference to Formulation/Recipe records	See comments
Malaysia	No	-	-	-	-	-
Netherlands	No	-	-	Yes	By common understanding it shall be at least 50%	-
New Zealand	No - see Comments under 1a and below		Australia New Zealand Food Standards Code, Standard 1.2.10			
Poland	No	GMP	-	No	GMP	-
Romania	Yes	About 50% of raw materials used				
Slovak Republic	No	-	-	No		
Spain	Yes	50% m/m of the total dry matter of the processed cheese	Annex 2 of the order of 29 November 1985, the standard for cheeses and processed cheeses (B.O.E 06.12.85)	No	-	Annex 2 of the order of 29 November 1985, the standard for cheeses and processed cheeses (B.O.E 06.12.85)
Switzerland	Yes	Products without PDO: the melting mix must consist of at least 50% of the cheese referred to. Products with PDO: the melting mix must consist of at least 75% of the cheese referred to.	LMV Art 84 para 2 lett. B/c	Yes	For processed cheese with Glarner Kräuterkäse, a cheese with a very strong flavour, the requirements are different. The quantity of cheese used for the processed cheese must be such that the typical flavour in the end product is achieved only with cheese.	LMV Art 84 para 2 lett a.
United Kingdom	No	See comments			See comments	



United States of America	No	-	-	Yes	See comments	Code of Federal Regulations, Title 21, Part 133.169
Uruguay	Not as a figure	Not in another way				

### **Comments**

#### **Austria**

X) footnote: The ÖLMB is not a law or ordinance but an expert opinion agreed among authorities, academic community, consumers, industry and other interest parties.

#### **Canada**

The standard states that the product shall be made by mixing the named variety cheeses with heat and may contain (only) water, added milk fat, salt, vinegar, sweetening agents and permitted additives but that the milk fat and moisture content of the final product cannot exceed the varietal cheese % moisture by more than (3 or 5%) and must not have less than (2 or 3%) minimum milkfat of those varieties.

#### **Hungary**

Indirect for processed cheese bearing a variety name: the amount of the specified cheese varieties must be at least min 75% (m/m). Solids content of the sliceable cheese can be lower by max. 4% than that of the specified cheese or than the arithmetical mean of solids content of the used cheeses.

#### **Ireland**

SI No. 92 of 2000 European Communities (Labelling Presentation and Advertising of Foodstuffs) (Amendment) Regulations 2000 – this would require the content of the named cheese to be listed under QUID (Quantity Ingredient Declaration)

#### **New Zealand**

Where a food label specifies a particular variety of cheese (e.g. “Processed Cheddar Cheese”), the percentage content of that variety must be labelled, as the characterising ingredient, as per Standard 1.2.10.

#### **United Kingdom**

There are no UK regulations covering the minimum cheese content of processed cheese bearing a varietal name. The Food Labelling Regulations 1996 describe, among other things, Quantified Ingredient Declaration (QUID) requirements. Named variety processed cheese would be required to give a quantitative declaration of the varietal cheese present.

#### *Minimum cheese content of processed cheese and of processed cheese preparations*

Processed cheese preparations, such as processed cheese spread, are available in the UK and are often targeted at the children’s market. Such products would be expected to give a quantitative declaration of the cheese content of the product.

### United States of America

In the United States, standards establish the minimum cheese content for processed cheese bearing a variety name and rely on compositional analysis of fat and moisture to ensure that the standards are met. To accomplish this, the standards limit the amount of ingredients other than cheese that may be used in processed cheese. The composition of the natural cheese used can influence the amount of cheese, however, in every instance at least 85% of the processed cheese is natural cheese(s). In addition, the type(s) of cheese used as raw materials is specified and certain varieties of cheese are not permitted as the cheese ingredient. One or more varieties of cheese may be used provided that they are specified on the label in accordance with national legislation.

**Question 2: Can you agree with the first proposal provided in the report of the working group on cheeses (CX/MMP 00/7) and discussed during the 4<sup>th</sup> session of the Codex Committee on Milk and Milk Products that:**

**“the product is qualified by a cheese content, in quantity or characterization terms.”**

Country	a) In the case of processed cheese?		b) In the case of processed cheese preparations?	
	Yes or No	Please explain your agreement or if you disagree, could you modify the proposal to make it satisfactory?	Yes or No	Please explain your agreement or if you disagree, could you modify the proposal to make it satisfactory
Argentina	No	Is not possible to modify this proposal to make it satisfactory for us because it doesn't exist to the date available technology to be able to determine the quantity of cheese	No	Is not possible to modify this proposal to make it satisfactory for us because it doesn't exist to the date available technology to be able to determine the quantity of cheese
Austria	No	This proposal is too general, too vague, no clear definition what is meant by quantity and quality . It should be made clear that minimum limits of cheese contents are the basis. The following proposal was elaborated which is supported by us (see table)	No	See 2a
Canada	Yes	We believe that this product is presented to the consumer as a “type” of cheese and is consumed by both children and elderly people, often as a replacement for other cheeses or other dairy products. In light of this, we feel that the nutritional value of this product is important (i.e. protein, calcium, minerals). Therefore if the name of “cheese” is used within the product name, cheese must be a significant ingredient (on a dried weight basis) and utilize the product(s) “cheese” as per the A-6 standard.	Yes	Same comments as Question 2 a. If this is not agreed upon, we would suggest that an alternate name be proposed for these products (perhaps without reference to the word “cheese”). As well, the addition of the term “preparation” does not clarify the difference in this product from processed cheese.
Croatia	Yes		No	

Czech Republic	Yes	It is necessary to have limit of lactose in product too, we propose maximum 5% m/m – see Codex Stan A-8 a,b/1978, 2.2	Yes	
France	Yes	See comments.	No	The proposed formulation is not sufficiently compatible with the wide range of products present on the market.
Germany	No	No for reasons of consumer protection Germany supports the rules as laid down in Codex STAN A-8 (A-C) – 1978	No	Question 2a.
Hungary	Yes		Yes	
Ireland	No	This phrase is meaningless without some attempt to define, in numerical terms, the term “quantity”. This could be done by including a minimum of X% (20% ?)Cheese	No	This phrase is meaningless without some attempt to define, in numerical terms, the term “quantity”. This could be done by including a minimum of X% Cheese (here X could be lower than 2 (a) above.
Malaysia	-	-	-	-
Netherlands	Yes	-	Yes	-
New Zealand	Yes	* (see comments)	Yes	* (see comments)
Poland	Yes	Characterization terms – to be specified	Yes	
Romania	Yes	The cheese role is important, but the fixed level is not relevant, because the big number of cheese types. Also, the analyse methods for determination of cheese content utilised are not disponibles in the present.	No	This formulation is not sufficiently adapted to the large number of products who are now on the market.
Slovak Republic	Yes		No	
Spain	No	See comment ** in the last section of this document	-	See comment * in the last section of this document
Switzerland	Yes	As the product is called “processed cheese preparation” consumers would be deceived if the product does not contain a considerable amount of cheese. Therefore a qualification concerning the cheese content is necessary.	Yes	As the product is called “processed cheese preparation” consumers would be deceived if the product does not contain a considerable amount of cheese. Therefore a qualification concerning the cheese content is necessary.
United Kingdom		See Comments		See Comments
United States of America	No	At this time, the U.S cannot endorse this proposal. However, the concept of product qualification based on the actual cheese content does have some possibilities. We suggest that this option is pursued that the cheese content be integral to the requirement limitation.	No	At this time, the U.S cannot endorse this proposal. However, the concept of product qualification based on the actual cheese content does have some possibilities. We suggest that this option is pursued that the cheese content be integral to the requirement limitation.
Uruguay	Yes		No	

## Comments

### **France**

The proposal for processed cheese to be qualified in characterization terms is of considerable interest, in that this makes it possible to recognise that the cheese performs a significant function, while avoiding the complex debates which would be associated with a numerical approach. Indeed, in view of the wide variety of processed cheeses and the requirements of the regulations in place, it would be difficult to set a precise figure. In any case, the quantity of cheese varies according to the desired result (organoleptic characteristics for example), and even according to the nature of the cheese used (cured cheese, non-cured cheese, for example). It would not be possible to measure the quantities of cheese used with the analysis methods currently available (cf. reply to question No. 4).

### **New Zealand**

New Zealand agrees that “processed cheese” and “processed cheese preparations” are characterised by a cheese content. As outlined above, the Code and the Fair Trading Act require any food whose name includes the word “cheese” to contain some cheese.

### **United Kingdom**

#### *Questions 2 and 3*

The ‘UK proposal’ was suggested as a possible way forward to the last session of the CCMMP. It was offered as a constructive suggestion but is not a view that the UK is necessarily strongly wedded to. Indeed we believe that the Danish proposal also has considerable merit.

Having further considered the issue, the UK believes that declaration of the cheese content of processed cheese, and of processed cheese products, puts consumers in a better position to make an informed choice about the products on offer. Therefore we see the opportunity to combine the two proposals into one.

We are still discussing the issue of minimum cheese contents for processed cheese and processed cheese preparations with interested parties, and will inform you of progress when possible.

### **Question 3: Can you agree with the second proposal provided in the report of the working group on cheeses (CX/MMP 00/7) and discussed during the 4<sup>th</sup> session of the Codex Committee on Milk and Milk Products.**

#### **“cheese is a significant ingredient of ....”**

Country	a) “ ... processed cheese ...”		b) “...processed cheese preparations”	
	Yes or No	Please explain your agreement or if you disagree, could you modify the proposal to make it satisfactory?	Yes or No	Please explain your agreement or if you disagree, could you modify the proposal to make it satisfactory
Argentina	Yes	-	Yes	-
Austria	No	“significance” is to be defined by minimum cheese contents	No	This proposal is too vague – see answer to question 2a)

Canada	Yes	We believe that this product is presented to the consumer as a “type” of cheese and is consumed by both children and elderly people, often as a replacement for other cheeses or other dairy products. In light of this, we feel that the nutritional value of this product is important (i.e. protein, calcium, minerals). Therefore if the name of “cheese” is used within the product name, it must be meaningful (quantity, characterization, nutritionally) and utilize the product(s) “cheese” as per the A-6 standard.	Yes	Same comments as Question 3 (a). If this is not agreed upon, we would suggest that an alternate name be proposed for these products (perhaps without reference to the word “cheese”). As well, the addition of the term “preparation” does not clarify the difference in this product from processed cheese.
Croatia	Yes		No	
Czech Republic	No	We can agree (Yes), if the proposed limit of lactose 5% m/m would be accepted.	Yes	It can be accepted as alternative definition for these products. In every case it is necessary to give limit maximum 51% m/m cheese.
France	Yes	See comments	No	The proposed formulation is not sufficiently compatible with the wide range of products present on the market.
Germany	No	See question 2a	No	See question 2a
Hungary	Yes		Yes	
Ireland	No	Again this phrase is meaningless without some attempt to define in numerical terms “quantity”. This could be done including “a minimum of X% (20% ?) Cheese	No	Again this phrase is meaningless without some attempt to define in numerical terms “quantity”. This could be done including “a minimum of X% % Cheese (here X could be lower than in 3(a)
Malaysia	Yes	To include other optional ingredients to the ingredients list in para 2.1 (Codex Standard A-8 (c) – 1978) so as not to limit the ingredients to dairy products only.	-	-
Netherlands	No	The cheese content in processed cheese has to be at least 50% w/w or 43% on dry matter composition	Yes	-
New Zealand	No	*(see comments)	No	*(see comments)
Poland	No		No	
Romania	Yes	This proposition is really interesting because is possible to considerate the cheese like an important ingredient but not within an fixed and fixed level.	No	This formulation is not adapted for the products who are now on the market.
Slovak Republic	Yes		No	
Spain	Yes	See comment ** in the last section of this document	-	See comment * in the last section of this document
Switzerland	Yes	In case the expression “significant” is explained we can agree with this wording. Otherwise it is too imprecise and this could result in difficulties in international trade.	Yes	In case the expression “significant” is explained we can agree with this wording. Otherwise it is too imprecise and this could result in difficulties in international trade.

United Kingdom		See comments question 2		See comments question 2
United States of America	No	Significant is too vague a term to regulate minimum cheese content in processed cheese.	No	Significant is too vague a term to regulate minimum cheese content in processed cheese preparations.
Uruguay	No		Yes	

### **Comments**

#### **Austria**

	<b>Dry matter (min.)</b>	<b>Cheese content (min.) (solids of cheese, based on the dry matter of the finished product)</b>
Sliceable processed cheese		
Sliceable with fat in dry matter of 50% or more	50%	43%
Sliceable with fat in dry matter lower than 50%	34%	43%
Spreadable processed cheese		
Spreadable with fat in dry matter of 50% or more	40%	20%
Spreadable with fat in dry matter lower than 50%	30%	20%
Processed cheese preparation	20%	10%

#### **France**

This proposal too is of considerable interest, in that this makes it possible to recognise that the cheese performs a significant function, while avoiding the complex debates which would be associated with a numerical approach. Indeed, in view of the wide variety of processed cheeses and the requirements of the regulations in place, it would be difficult to set a precise figure. In any case, the quantity of cheese varies according to the desired result and even the nature of the cheese used (cured cheese, non-cured cheese, for example). It would not be possible to measure the quantities of cheese used with the analysis methods currently available (cf. reply to question No. 4).

#### **New Zealand**

New Zealand law does not require that cheese be a “significant ingredient” of “processed cheese” or “processed cheese preparations”. The term “significant” is ambiguous in the absence of a clear definition. As outlined above, the legal requirement for percentage labelling means that consumers can choose their preferred cheese content.

**Question 4: In the absence of an international method of analysis to determine cheese content in processed cheeses, does your country have a national method of analysis? If your answer is yes, what is this method ?**

Country	Yes or No	Details / comments
Argentina	No	
Austria	No	Not today because we do not know any existing analytical methods to do so. But the national regulations allow the authorities to control the physical inventory in the production location of the national producers and there the amount of cheese content used in processed cheese or cheese preparation can be controlled.
Canada	No	We do not have a method of analysis. However we assess these products by reviewing the product formulation and verifying the theoretical and actual added ingredients.
Croatia	No	
Czech Republic	No	But it is possible to check the recipes of products and to determine of lactose content of the product.
France	No	
Germany	No	
Hungary	No	No national method of analysis to determine cheese content in processed cheeses. (The actual cheese(s) content of the product can be controlled indirectly so, that producer is obliged to make the product according to the product specification sheet approved by the authority and fulfilment is controlled by the authority with random on-the-spot checks in the plant)
Ireland	No	As for Customs purposes control can be by reference to Formulation/Recipe records
Netherlands	No	
New Zealand	No	
Poland	No	
Romania	No	
Slovak Republic	No	
Spain	No	See comment *** in the last section of this document
United Kingdom	No	See comment
Switzerland	No	
United States of America	No	In the U.S., lab analyses are performed to monitor compliance with compositional requirements. By regulation, the amounts of other ingredients used are limited, thus ensuring that the cheese content is achieved.
Uruguay	No	

**Comments**

**United Kingdom**

The UK does not have a method of analysis for measuring the cheese content of these products. We would very much welcome a validated method that achieved this aim. However in the absence of analytical methods, the percentage cheese added at the mixing bowl stage should be declared as the cheese content. This can be checked through audit.

## **Additional comments**

### **Czech Republic**

The distinction of processed cheeses and processed cheese preparations is made by the Czech national regulations in which the maximum limit for processed cheese is fixed to 5% (m/m) of lactose content. The minimum content cheese must be required to be 51% (m/m) for both kinds of products. The method of the determination of lactose content has been used in international practice but the determination of cheese content proportional share has been checked according to prescriptions concerned. We are not familiar with any analytical determination so that differentiation between the protein content originated in cheese and the protein content originated in milk powder and other substitutional raw materials could be properly done. Codex standard A-8 a,b has been adhered to in the legislature of the Czech Republic.

### **New Zealand**

New Zealand is in a transitional phase of regulation of food standards. After 20 December 2002, the new joint Australia New Zealand Food Standards Code (the Code) will be the primary standard in force, so our reply focuses on the requirements of the Code and omits other current legislation.

### **Spain**

#### **(\*) Questions 1b), 2b) and 3b)**

In the legislation of Spain, the denomination "Processed Cheese Preparations" does not exist; all products which would be included in this group are covered by the denomination "Processed cheeses".

#### **(\*)(\*) Questions 2a) and 3a)**

We feel that the requirement for a minimum cheese content in processed cheese, apart from being impossible to control due to the diversity of cheeses and other raw materials used, is not in itself meaningful with regards to the flavour, texture and nutritive value of the processed cheese given the following:

- Since the flavour is dependent on the cheese used and the degree to which it is ripened, it would be incorrect to set a minimum cheese content for all processed cheeses.  
In addition, it is important not to forget that the Standard to be established for "Processed Cheeses" (Standard A-8) should be of an all-encompassing nature and, as a consequence, it should be possible to use cheeses manufactured in farms, which generally have more pronounced flavours than processed cheeses, whereas in order to attain the same "bouquet" from industrially manufactured cheeses, six or seven times the amount to the same cheese would be required.
- The texture depends jointly on the fat content in dry matter, the amount of lactose and the number of paracasein molecules intact in rennet. This latter number, in turn, depends on the degree to which the cheeses used in the manufacture of processed cheese are ripened, and, at times, on the melting salts and manufacturing process.
- With regards to the nutritive value, it is evident that the processed cheese components (fat and proteins, fundamentally) are obtained not only from the cheese, but also from the mixture with other raw milkfat materials used in manufacturing process (milk powder, butter, etc.). In view of these considerations, we believe that the only possible means of approximation, with respect to the establishment of a minimum cheese content in processed cheese is to make clear in the definition of processed cheese that "cheese is a significant ingredient".

#### **(\*)(\*)(\*) Question 4**

We do not have an analytic method, nor are we aware of the existence of a bibliography concerning an analytic method that would permit the detection of the minimum solids content of cheese in the dry matter of the processed cheese when the following may be used in the manufacture of processed cheese:

- Cheeses containing lactose, for example ultrafiltrated cheeses and unfermented cheeses (both with a maximum of up to 8% lactose).
- Cheeses without lactose, whose solids are the sum of proteins, fats, salts and aromatic products in which the fat content may be from 0 to 75% of the dry matter and the salts combined with the aromatic products may oscillate from 4% to 10% of the dry matter.
- Other dairy ingredients, such as milk powder and butter, which also contain protein, lactose and fat.