European Union comments on
Codex Circular Letter CL 2011/20-CAC/MMP

Subject: Request for information on the possibility of further work to develop standard(s) covering processed cheese

The European Union (EU) thanks the Codex Secretariat for having prepared a Circular Letter to explore the possibility of further work on processed cheese and are pleased to submit the following answers to the questionnaire attached to the Circular Letter.

FORM FOR SUBMITTING INFORMATION RELATING TO POSSIBLE WORK ON PROCESSED CHEESE

This form may be retyped if more space is needed under any heading provided that the general format is maintained.

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

EUROPEAN UNION (EU)

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

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

No substantial trade problems specific to processed cheese have been reported in the EU, neither on exports from the EU, nor on imports to the EU.

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

The EU is not aware of situations where diversity of legislation creates substantial problems for trade in processed cheese.

4. 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):

The EU is not aware of situations where absence of legislation creates substantial problems for trade in processed cheese.

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

5. Do you consider that Codex should undertake further work to develop a standard (or more than one standard) covering processed cheese?
The EU is of the opinion that Codex should not undertake any work to develop a standard (or more than one standard) covering processed cheese. The Codex Committee on Milk and Milk Products spent an enormous amount of time trying to reach consensus on the revision of the standards on processed cheese, but this proved to be impossible despite the organisation of several physical working groups on that issue. In addition to that, the fact that no problems in international trade of processed cheese exist leads to the conclusion that Codex should not waste its scarce resources on this issue where consensus is unlikely.

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

6. 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.

7. 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):

No potential impediment to international trade has ever been substantiated.

8. 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:

CCMMP spent an enormous amount of time trying to reach consensus on the revision of the standards on processed cheese, but this proved to be impossible despite the organisation of several physical working groups on that issue. In particular no consensus could be found on the product composition (notably the cheese content), the scope, and the permitted ingredients. Development of regional standards on processed cheese...
cheese, as was mentioned at the Codex Alimentarius Commission, would go against the rules for developing regional standards which by definition should only deal with products traded in one region. Clearly processed cheese is a product internationally traded and the development of regional standards would very likely lead to different sets of rules according the regions and therefore introduce trade complications.