



# The Codex General Standard for the Use of Dairy Terms - Its nature, intent, and implications

## Key messages:

- Codex Committee on Milk and Milk Products developed The Codex General Standard for Use of Dairy Terms (GSUDT) to ensure that dairy terms were being accurately applied to dairy products
- The definition of milk in the GSUDT refers to “normal mammary secretion of milking animals obtained from one or more milkings”
- The general principle laid down in the GSUDT is that dairy terms are reserved to milk and milk products conforming to this definition
- Common dairy terms (e.g., milk, cream, cheese, specific cheese names, butter, yogurt, etc.) are reserved for products that are made from milk and milk products because applying these terms to other products fundamentally misleads consumers
- The GSUDT should be interpreted and applied correctly to limit the potential misuse of dairy terms
- National authorities are encouraged to take this into consideration in order to ensure fair practices in food trade and provide consumers with the confidence that they are getting the quality and nutritional value they expect when they buy dairy products.

## Background and objectives

The Codex General Standard for Use of Dairy Terms (1) (GSUDT) provides guidance on the correct use of terms that are universally identified with dairy products. It was developed by the Codex Committee on Milk and Milk Products (CCMMP) in the late 1990s given increasing need to ensure that dairy terms were being accurately applied to dairy products and to limit the potential misuse of dairy terms on products that do not contain milk or its derivatives.

At a time when confusing marketing and naming practices are increasingly being used to describe imitation products and capitalize on the positive health perceptions of dairy, it is more important than ever for policymakers, food business operators and enforcement authorities to interpret and apply the GSUDT correctly.

## GSUDT scope and core principle

The GSUDT addresses categorization, labeling and promotional information for dairy foods and non-dairy foods that seek to use dairy terms. It is important to note that the scope applies to milk and milk products for further processing (intermediate dairy products and bulk products intended for further processing) as well to dairy foods and non-dairy foods for the end-consumer. The GSUDT does not apply to products intended for non-human-food uses such as animal feed or medical products.



Consistent with the Codex General Standard for the Labelling of Prepackaged Foods (2), a core principle of the GSUDT is that foods shall be described and presented in a manner that ensures consumers are not misled or confused. Labeling of dairy products or non-dairy products using dairy terms shall not be false, misleading, deceptive, or create an erroneous impression regarding its character in any respect, including being suggestive of any other product with which the food might be confused.

When naming modified dairy products, descriptors or qualifiers shall be included on the label of the product if their omission would mislead or confuse consumers. Common necessary qualifiers are needed when milk or dairy products are modified in the following ways: source species declarations (e.g., goat, buffalo), compositional modification (e.g., lactose free or modification of fat content, change in water content), modification of nutritional properties, extension of shelf life or change in physical conditions.

### GSUDT definitions and application to dairy products

The use of terms explained in the GSUDT include: “milk,” “milk product,” and “reconstituted milk products,” “recombined milk products” and “composite milk product.” The GSUDT is also clear that only products meeting the provisions of relevant Codex product Standards for milk and milk products may use the standardized name or term. Codex maintains 35 product standards for dairy products including cheeses, creams, fermented dairy products, dairy ingredients, and butter/spreads. Nearly all of these standards contained detailed compositional requirements (3).

### Use/Misuse of Dairy Terms when Applied to Non-dairy Products

The general principle laid down in the GSUDT is that dairy terms are reserved to milk and milk products. Products that do not contain milk or permitted milk constituents, but use dairy terms are not in compliance with the GSUDT (4). In other words, common dairy terms (e.g., milk, cream, cheese, specific cheese names, butter, yogurt, etc.) are reserved for products that are made from milk and milk products because applying these terms to other products fundamentally misleads consumers. Examples of common mis-uses of terms that are not permitted by the GSUDT can be found in the table at the end (please note that these examples are non-exhaustive) (5).

Further, with the introduction of cultured and lab-grown ingredients that seek to compete with milk and dairy foods, it is necessary to recall that the definition of milk in the GSUDT refers to “normal mammary secretion of milking animals obtained from one or more milkings...” (6). This means that products that are not “normal mammary secretions” obtained by milking animals do not fit the definition of milk found in the GSUDT. Finished products that do not contain dairy, but do contain cultured and lab-grown ingredients, would not meet the terms of the GSUDT to be labeled as milk or milk products.

### Why accurate naming is essential

Ensuring that national or regional legislation/regulation is consistent with the principles of the GSUDT helps to:

- Minimize the potential for consumers to be misled
- Recognize the unique nutritional value of dairy and its proven health benefits and safeguard for potential negative health impacts from imitation products
- Meet international trade obligations



As more and more dairy imitators are being marketed around the globe, it is essential to understand international consensus on the use of dairy terms, reevaluate practices in the marketplace, and to take specific action to ensure consumers are not misled. A process of frequent reevaluation, particularly as new technologies are applied to the marketplace, will protect consumers, ensure fair practices in food trade and provide consumers with the confidence that they are getting the quality and nutritional value they expect when they buy dairy products.

For further information please refer to the IDF Bulletin 507/2020.

#### Misuses of designations

- The name “butter”, “vegetable butter”, “vegetable-based butter”, “plant butter” and “butter blend” for fat spreads containing vegetable oil
- The designations “vegetable oil cheese”, “rice cheese”, “plant-based cheese”, and “margarine cheese”
- The margarine names “rama” (7), “edelram”, “butella”, “beurrine” and “cremex” (according to the language in the country of sale)
- The name “coffee creamers” for coffee whiteners without milkfat
- The names “oat milk”, “almond yoghurt”, “soy cream”, “oat milk” and “rice milk” for plant -based products
- The name or statement “Camembert alternative” or other similar expressions such as “style”, “type”, “method”, “imitation”, “flavor”, “substitute” or “like”.
- The name “dairy free coconut yoghurt”
- The terms “milk” or a name of a milk product as the name of finished consumer products that do not contain dairy ingredients and are produced from cultured or lab-grown ingredients (8)

#### Deliberate misspelling of designations

- Mylk – M\*lk
- Frawmage – cheeze
- Camemvert
- Mozzarizella

#### Descriptions of the use or the functionality

- “Made exactly like butter”
- “Real alternative to cream”
- “Like cheese”, “like butter”, etc.

#### Descriptions on non-dairy products that demean or discredit dairy products

- An illustration of a cow with a dash over
- Statements like: “the creamy taste of cream without the bad conscience” or “contains none of the less good”
- Campaigns such as “equal to milk but made for humans”

#### General presentation of products

- Pictures of cows, churns, milk cans, etc. on the package of non-milk products
- Statements such as “Think cow’s milk... without the cow and milk part”



## Endnotes

- (1) CXS 206-1999 Available at: [http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FStandards%252FCXS%2B206-1999%252FCXS\\_206e.pdf](http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FStandards%252FCXS%2B206-1999%252FCXS_206e.pdf)
- (2) CXS 1-1985. Available: [http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FStandards%252FCXS%2B1-1985%252FCXS\\_001e.pdf](http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FStandards%252FCXS%2B1-1985%252FCXS_001e.pdf)
- (3) A complete list of Codex dairy standards is available here: <http://www.fao.org/fao-who-codexalimentarius/codex-texts/list-standards/en/>
- (4) Some specific exemptions are provided for traditionally named products (cocoa butter, canned coconut milk/cream). These exemptions are provided because of both long-established practice and since these products are not typically marketed as replacements/substitutes for the dairy terms utilized.
- (5) Examples provided not intended to be exhaustive.
- (6) CXS 206-1999.
- (7) The term “rama” is very close to the German name for cream “rahm”.
- (8) With the introduction of cultured and lab-grown ingredients that seek to compete with milk and milk products, it is necessary to recall that the definition of milk, refers to “normal mammary secretion of a milking animal (or animals) obtained from one or more milking’s...” This means that products that are not “normal mammary secretions” and obtained by milking an animal or animals do not fit the definition of milk stated in the GSUDT. Finished consumer products that do not contain dairy ingredients, but do contain cultured or lab grown ingredients, would not meet the terms of the GSUDT to be labeled as milk or milk products.