

To all Interested Parties

26 July 2000

Reference:

Dear Sir/Madam

FOOD LABELLING: DEFINITION OF THE TERM "MEAT" FOR THE PURPOSES OF QUID DECLARATION AND INGREDIENT LISTING

This letter seeks your views on the attached draft discussion document, prepared by the European Commission, which proposes a definition of "meat" for the purposes of food labelling and makes consequential proposals relating to QUID declarations, and ingredient listing, for products containing meat.

The proposal

The attached draft discussion document proposes a definition for "meat" that is intended only for the purposes of labelling products containing meat (eg for ingredient listing and as the basis for QUID declarations). Basically, it is proposed that the term "meat" only be used to describe skeletal muscle (see Part I of the Annex), with limits being placed on the amount of fat and connective tissue that can be included (see Part II of the Annex). The figure for "connective tissue" probably refers to the percentage of collagen in fat-free meat protein. The proposed definition would be considerably tighter than the existing definition of "meat" in the Meat Products and Spreadable Fish Products Regulations 1984 (as amended). If it is agreed, there will need to be a consequential examination of the reserved descriptions of meat products in those Regulations.

A supplementary definition, "meat co-products", is also proposed, which would cover mechanically recovered meat (MRM) and any other animal parts considered suitable for human consumption which were not covered by the definition of "meat".

For the purposes of ingredient listing, the indications "meat" and "meat co-product" would need to include reference to the relevant species from which they had been derived. Alternatively, the term "meat co-product" may be replaced by the specific name of the product (eg "lamb's liver"). MRM would continue to need to be identified separately, as described in MAFF's letter to all interested parties dated 12 May 1997 (copies of which are available from Janet McKenzie). It is not clear whether it is also the intention that all "meat" and all "meat co-product" ingredients would be grouped under these headings and identified by those terms in the list of ingredients (eg "meat (beef, pork, lamb, chicken)" or "meat co-products (mechanically recovered beef, pork and lamb)").

For the purposes of QUID, it is proposed that products containing a mixture of meats from more than one species should give declarations for each of the species used in the ingredient list. It is not clear whether it would be acceptable, as an alternative, to give a QUID declaration for the total meat, plus any of the meats specifically mentioned in the name of the food (eg a "pork sausage" containing pork, chicken and beef would give a QUID declaration for the total meat and the pork rather than separate declarations for the pork, the chicken and the beef).

Your comments

We are not sure when this document is likely to be discussed in Brussels, but it is possible there could be a meeting in September. **If possible, I would be grateful if any comments you have on the attached paper could, therefore, be sent to Matthew Carden by 31 August 2000.** If you can't meet this deadline but would like to submit comments, just let us know and send them in as soon as you can after this date.

Please feel free to pass this document to anyone with an interest in this issue, or alternatively you can send us their contact details and we will arrange for copies to be sent to them. A list of our existing consultees is available on request from Janet McKenzie. This consultation package is also available from our website, where a summary of the responses received will also be published. All the comments received will also be available for public examination. Please contact Janet McKenzie for more details. **If you would prefer your comments not to be made publicly available, please indicate this in your letter, explaining your reasons.**

Further information

If you need any further information about the issues covered in this letter, please contact me or Matthew Carden, or Kevin Hargin if your enquiry relates specifically to the definition of meat or issues relating to the Meat Products and Spreadable Fish Products Regulations 1984 (as amended). If the mailing information used to send you this letter has changed, please let Janet McKenzie have your new details.

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Yours faithfully

Keith Gregory

EUROPEAN COMMISSION
HEALTH & CONSUMER PROTECTION DIRECTORATE-GENERAL

Brussels,
SANCO.02/JFR D(2000)

DRAFT

COMMISSION DISCUSSION DOCUMENT

Subject: **definition of the term “meat” for labelling purposes.**

Aim

Directive 2000/13/EC on the labelling, presentation and advertising of foodstuffs has two aims: to improve consumer information and ensure the smooth operation of the internal market. In order to implement the rules concerning the nature and characteristics of foodstuffs, it was considered necessary to draw up a harmonised definition of the term “meat”.

Current legislative situation

Directive 64/433/EEC on health problems affecting intra-Community trade in fresh meat and its associated directives contains a definition of meat drawn up for the purposes of hygiene and health protection for consumers.

The definition of the term “meat” for labelling purposes should be compatible with the definition of meat in the “hygiene” directives, which covers all parts of animals fit for human consumption from a public health point of view.

This definition is intended only for the purposes of labelling products containing meat and to which QUID should apply. The definition is applied to these products to indicate their composition in terms of the list of ingredients and for other labelling requirements laid down by Directive 2000/13/EC.

The products covered correspond basically to meat-based products (prepared meals, preserved meat, sausage products), but the list of products to which QUID applies is the subject of other work, which should be distinguished from the aim of this document.

Furthermore, the general provisions for the application of QUID¹, which have been validated by regulatory committee, are also relevant to products containing meat. Nevertheless, some specific provisions may be necessary in order to apply QUID to these products, and these are set out in point 4.

3. Draft definitions

At the meeting of the group of experts on labelling held on 19 January 2000, the Member States indicated their preference for a definition of meat corresponding to the perception of the term “meat” by the consumer: the category name “meat” would be reserved for skeletal muscle. As a result, other edible parts, which are included in the definition of meat within the meaning of the “hygiene” directives, should come under another category to be defined jointly.

It is therefore worthwhile supplementing the definition of the term “meat” with that of the category “meat co-product(s)”; the two categories cover the scope of the definition of meat in the “hygiene” directives.

Mechanically recovered meat should be included in the category of “meat co-product(s)”.

Draft definitions of these two terms are set out in part I of the Annex.

The fat content and the proportion of connective tissue, which are naturally associated with muscles, should be limited in order not to deceive the consumer as to the actual composition of the products and to ensure fair competition between operators.

These limit values take into account the compositional characteristics for each species and good manufacturing practices. In order to simplify monitoring, only two categories of species have been adopted.

The total maximum fat and connective tissue content are set out in part II of the Annex.

Given the legitimate expectations of consumers (preferences for certain species, religious practices, etc), but also differences in price, the mention of the species used should be accompanied by the term “meat” or “meat co-product(s)”.

In order to give them force in law, these definitions should be inserted with other category definitions in Annex I to Directive 2000/13/EC in accordance with the procedure laid down in Article 20 thereof.

¹General guidelines for implementing the principle of Quantitative Ingredients Declaration (QUID), reference III/5260-rev-5/98-EN.

4. Guidelines for the use of these definitions

All the guidelines of the QUID reference document¹ apply, except in the following cases:

- For products containing a mixture of meats from more than one species, the respective percentages per species must be included in the list of ingredients.
- For products containing meat in which bones or cartilage are naturally embedded (eg chicken thighs), the bone and cartilage content of the meat must not exceed natural proportions.
- In accordance with the statement of the standing committee for foodstuffs on the 26th of June 1996, the reference to “mechanically recovered meats” and the percentage thereof must be separate from the other ingredients.

ANNEX

Part I

Definition	Designation
1. Skeletal muscles of species of mammals and birds recognised as fit for human consumption with naturally included or adherent tissue, where the total content of fat and connective tissue does not exceed the values set out in Part II.	“Meat”, followed by the name(s) of the animal specie(s) from which it comes.
2. Parts of animals other than those defined in 1 recognised as fit for human consumption and coming from the same species.	“Meat co-product(s)”, followed by the name(s) of the animal specie(s) from which it (they) come(s).
	This designation may be replaced by the specific name of the meat co-product(s).

Part II

Maximum authorised content for fat and connective tissue (Part I, 1)

Species	Fat (%)	Connective tissue (%)
Mammals except rabbits and mixtures of species	25	25
Birds and rabbits	15	10