

**THE USE OF VEGETABLE PROTEINS
IN MEAT PRODUCTS:****THE “OPTIMAL AMOUNT” APPROACH**

Recently the “Meat products Directive” (Council Directive 92/5/EEC amending and updating Directive 77/99/EEC on health problems affecting intra-Community trade in meat products and amending Directive 64/443/EEC) has been adopted by the Council.

In the meantime, this Directive has already been published in the O.J. (L 57, dd. 02.03.1992).

Concerning the incorporation into meat products of starch or proteins of animal or vegetable origin, Article 21 says that the Council should take a decision before 1 January 1993 on the maximum percentages permissible from a technological viewpoint.

If the level applied is lower than this maximum, it will not be obligatory to mention specifically the incorporation by way of front label declaration (cfr. Annex B, Chapter 5).

After having given this topic careful consideration, EUVEPRO arrived at the following position.

EUVEPRO is strongly opposed to fixing an arbitrary “numerical” maximum percentage permissible from a technological viewpoint but thinks that it should remain the responsibility of the manufacturer – the meat processor – to determine the “optimal amount” required.

It is a fact that there is no such thing as “one single level” of starch or proteins, which covers all possible technological applications. Indeed, different applications in different products would lead to a great number of different maximum percentages of starches or proteins needed for technological purposes. We would like to underline that for the moment there are more than 675 different meat products defined by national standards in the legislation of the Member States.

The application of an “optimal amount” (O.A.) is a logic consequence of the following considerations:

- The question of health risk is not even raised because here we are talking about the addition of a food ingredient to prepare a compound foodstuff. This reflection is very important because the “meat products directive” is said to be dealing with health problems;



- As confirmed by the Codex Committee on Processed Meat and Poultry products (CXPMP) and endorsed by the Codex Alimentarius Commission (CAC)-session in July 1991, the determination of quantitative limits is not the appropriate way to apprehend the complexity and the specificity of the functional usage. As a matter of fact, the usage, as a functional ingredient, up to the optimal amount required perfectly balances the quantity used and the purpose sought for each specific application. In other words, the use will be limited by the quality of the product.

According to the “Commission’s interpretative communication on the names under which foodstuffs are sold”, additional labelling provisions are only required if the resulting products differ from goods generally known under the same name in the community to such an extent that it cannot be regarded as belonging to the same category. As the characteristic of a meat product will mostly be the meat content and as a minimum meat content should be respected, there is no deception of the consumer.

Also the USDA has stated that soya proteins in meat products do not need special labelling anymore but can be mentioned on the ingredient list.

In addition, EUVEPRO would like to point out that, in the broader context of GATT (cfr. Draft GATT Sanitary and Phytosanitary Measures), measures to limit the use of certain established food ingredients in certain foodstuffs will certainly be interpreted as a barrier of trade!

It is important to understand that the possibility to use an “optimal amount” should not be interpreted as some sort of “ad libitum” facility given to meat processors. Indeed, this would mean that starch or protein should be used according to GMP at a level not higher than is necessary to achieve the intended purpose, i.e. to fulfill the technological need for the product being produced.

The use of the concept of “Optimal Amount” (O.A.) in conjunction with the one of GMP, the latter one already being introduced in other EC-Directives under preparation, meets the objectives of:

- Ensuring consumer safety and product wholesomeness, which should in any case be the first aim of a Directive dealing with “health” matters;
- Facilitating intra-Community trade;
- Providing a reasonable degree of flexibility in the choice and application of the different types of starches and proteins.



Furthermore, the enforcement authorities may (and will) request justification from the meat processors of the level he considers being G.M.P.

Adherence to the GMP-concept, far from giving excessive freedom to use starch or proteins in meat products, forces the meat processor to behave in a responsible manner.

But, since this is a dynamic and adaptable concept, it will help this meat processor to better fulfill his role, which is to provide a range of attractive, wholesome and nutritious products, legally manufactured and marketed, amongst which individual customers may choose.

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Brussels, May 2007