

European Union comments on
Codex Circular Letter CL 2021/92-OCS-FA
Request for comments on the use of trisodium citrate (INS 331(iii)) in Food
Category 01.1.1 “Fluid milk (plain)”

European Union Competence
European Union Vote

In reply to the question raised in CL 2021/92-OCS-FA, the European Union (EU) would like to provide the following comments:

In the EU, the technological need for trisodium citrate (INS 331(iii)) in Food Category 01.1.1 “Fluid milk (plain)” is recognised only for UHT goat milk since goat milk produces heavy sediment on UHT treatment.

There is an experimental evidence that trisodium citrate is able to act as an efficient stabilizer reducing ionic calcium (citrates react with calcium limiting the pH decrease and increasing the buffering capacity) which prevents formation of the sediment. Hence the amount of citrate is also an important parameter that governs the ionic calcium level. To the EU’s knowledge the maximum level up to 4000 ppm is appropriate to adjust the milk pH to an optimum range as regards the heat stability without having any possible adverse effect as for the nature and quality of goat milk.

Milk of bovine species is generally less sensitive to protein coagulation and therefore the use of trisodium citrate is not considered justified within the production conditions of milk of bovine species in the EU.