

# Greenwood Valley Cheese Company LLC

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May 7, 2001

Director, Division of Standards and Labeling Regulations  
Office of Nutritional Products Labeling and Dietary Supplements  
Center for Food Safety and Applied Nutrition (HFS 820)  
Food and Drug Administration  
200 C Street SW  
Washington, DC 20204

**File Ref: G1/1/1**

Re: Extension of Temporary Permit, Standard  
Of Identity for Parmesan Cheese  
Petition to Food and Drug Administration

Dear Sir or Madam:

I. Preface

1. This application is submitted in response to the notice ("Notice") given in the Federal Register dated December 29, 2000 (Volume 65, Number 251) pertaining to parties seeking to participate in the test marketing of grated Parmesan cheese that deviates from the current standards of identity set forth in 21 CFR §133.165 and 21 CFR 133.146. The Notice relates to a petition submitted to the Food and Drug Administration (FDA) by Kraft Foods, Inc. to amend the previously mentioned standards of identity for Parmesan cheese by reducing the period required to cure the product from ten (10) months to six (6) months. We hereby, request the FDA's approval to participate in the market test using Parmesan cured for six (6) months on the same terms and conditions that have been granted to Kraft Foods, Inc.
2. Greenwood Valley Cheese Company, LLC is a private label packer. That is, we process aged Parmesan cheese into a grated format then pack it into packages of various sizes and configurations that are standard to the industry, and then label the packages with the brand names of our customers. In addition, we have one brand that is proprietary to our company, "Mid America Farms".
3. In accordance with the Notice, the information below is submitted in support for our application to participate in the market test.

II. Description of the Test Products

1. The product we propose to manufacture for retail, foodservice and ingredient sales is grated Parmesan cheese produced from Parmesan cheese that is cured for six (6) months, rather than the 10 months specified in 21CFR § 133.165. With the exception for the difference in the length of curing, the product will meet all requirements of the standard of identity applicable to Parmesan cheese.
2. The manufacturing procedure adopted for the production of this cheese is described in Exhibit 1, marked "Confidential". We request your Department to treat our detailed scientific report supporting our manufacturing process to achieve mature aged Parmesan cheese within six months as STRICTLY Confidential and NOT available for public access.
3. The make procedure involves the combined use of a safe and suitable enzyme technology, coagulant type, and starter adjuncts capable of producing fully cured Parmesan within six (6) months in a manner that otherwise completely complies with all aspects of 21 CFR § 133.65. Otherwise, the manufacturing procedure is identical to the make procedure that conventionally has been used by cheese makers for Parmesan production. Using the new enzyme technology and make procedure outlined in Exhibit 1, it is possible to produce a Parmesan cheese suitable for grating in six (6) months, rather than the customary ten (10) month timeframe. In all other respects the product will meet the requirements described in 21 CFR § 133.165 except the cheese will have been cured for six (6) months.

III. Amount To Be Distributed / Area of Distribution

1. We seek approval for nationwide distribution covering a quantity of 19 million pounds per annum of product in retail, foodservice, and ingredient packages for the reasons outlined below.
2. There is a need to evaluate the cheese under different climatic conditions: high/low altitudes and environments with high/low extremes of temperature and humidity. In addition, we believe from a consumer marketing perspective that it is reasonable to test the product amongst different ethnic populations. A further market segment we wish to test is the foodservice sector who uses Parmesan cheese as a topping and

Director, Division of Standards and Labeling Regulations  
May 7, 2001  
Page 3

vital ingredient in some specialized sauces and other food preparations. A quantity of 19 million pounds will permit us to test for geographic, climatic and market sector acceptance.

3. Accordingly, for the factors outlined above, we seek approval for nationwide distribution covering a quantity of 19 million pounds per annum of product which will be distributed for retail, foodservice and ingredient uses.

IV. Nutritional Labeling

A copy of every label subject to our petition is attached in Exhibit 2, and marked "Confidential".

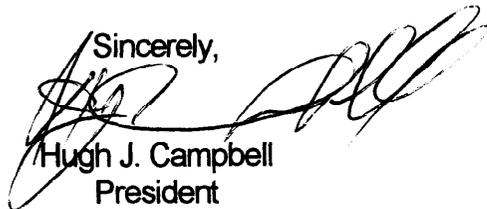
V. Conclusion

In keeping with the above information, the evidence submitted and exhibits enclosed with this application, we request the FDA's approval to participate in the market test to evaluate the use of Parmesan cheese cured for six (6) months rather than ten (10) months on the same terms and conditions that have been granted to Kraft Foods, Inc.

Because the particulars in the exhibits marked "Confidential" constitute trade secrets that are critical to the ability of our supplier to maintain a competitive position, we request that the FDA maintain the confidentiality of this material.

If you require any further information to assist your evaluation of our Petition, please feel free to contact me at the telephone number stated on the letterhead.

Sincerely,



Hugh J. Campbell  
President

Attachments (3)