

Consorzio del Formaggio Parmigiano-Reggiano

Sede: Via J. F. Kennedy, 18 - IT 42100 Reggio Emilia - Cod. Fiscale P. IVA 00621790351
tel + 39 0522 307741 - fax + 39 0522 307748 e-mail staff@parmigiano-reggiano.it

dicembre 21, 2005

Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Comments on Docket No. 2000P-1491,
A Petition Dated August 8, 2000 Requesting That
FDA Amend the Current Standard of Identity in
Part 133 (21 CFR Part 133)

Dear Docket Officer:

This comment is submitted on behalf of the Consorzio del Formaggio Parmigiano-Reggiano (Consorzio Parmigiano-Reggiano or Consorzio), a consortium organized in 1934, and charged by the Italian government with the responsibility of certifying Parmigiano Reggiano cheese produced in a defined area of Italy, and meeting specific quality standards. Parmigiano Reggiano is one of the most famous European geographical indications. The term "Parmigiano" means "of or from Parma"; the term "Reggiano" means "of or from Reggio", the centers of the geographic location in Italy in which Parmigiano Reggiano cheese is produced. When producers of such cheese meet predetermined quality standards, the Consorzio authorizes those producers to mark and identify their cheese with the certification marks "Parmigiano Reggiano."

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Parmigiano Reggiano cheese is a hard grating cheese which is eaten in chunks, slivers or grated. This world famous cheese is produced from unpasteurized raw milk drawn from cows feeding on plants growing in this particular area of Italy. The cheese produced from such milk is carefully crafted in a traditional manner, conforming to the Consorzio's certification standards. Such traditional cheesemaking is an artistic craft, the historical fruit of Benedictine and Cistercian monks who originated the recipe eight centuries ago in the Middle Ages; it is not a manufacturing science.

The animals from which the milk is produced, the food which these animals are fed, and the manner in which Parmigiano Reggiano cheese is crafted all effect the flavor of the finished cheese. Additives and preservatives are strictly prohibited; unpasteurized raw milk, salt and rennet are the only ingredients used, and permitted to be used, in the production of this cheese. It is the naturalness of its processing, and the allegiance to the geographical origin of its ingredients, of or from Parma; of or from Reggio, that creates this unique cheese. Accordingly, the flavor of such a traditional cheese is determined by where it is made, its geographical origin. The plants the animals eat in order to produce the milk, the unpasteurized raw milk from which the cheese is produced and the aging of the cheese determine the flavor and the aroma of the finished product. The flavor of Parmigiano (of or from Parma) Reggiano (of or

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from Reggio), Parmesan (of or from Parma) cheese is drastically different depending on how long it is aged, and how it is handled while aging.

In order for cheese to be certified as Parmigiano Reggiano, one of the criterion such cheese must meet is to be aged a minimum of 12 months. Most of this cheese is aged much longer. Parmigiano Reggiano cheese, or Parmesan cheese - its protected designation of origin throughout the 25 member states of the European Union - requires at least 12 months aging to develop a unique structure and flavoring which consumers associate and expect with such an exceptional full-flavored aged cheese. Such attributes cannot be developed in 6 months.

The stated reasons promoted in the Petition for changing the FDA aging standard, modern manufacturing procedures, commercially available enzymes and modern manufacturing equipment, may provide a manufacturer with economic benefit by reducing the cost of inventory, thereby making it possible for the manufacturer to devote some of their production resources to the manufacture of other cheese products, but such expediencies will not promote honest and fair dealing in the interest of consumers. Such a cheese may be safe and edible, but it is not Parmesan cheese. Such cheese is not a product of the unique traditional production that only the particular Italian geographical origin can guarantee to the consumer.

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Grating is but one manner in which Parmesan cheese is eaten. However, it is well known that grated cheese rapidly oxidizes. Excessive oxidation destroys the taste, texture and flavor of the cheese that has been grated. It is recommended that Parmigiano Reggiano cheese be grated on food immediately prior to eating. Parmesan cheese grated in this manner will still possess the unique taste and aroma of the finished cheese. To maintain the characteristics of Parmigiano Reggiano cheese, and to insure the original organoleptic qualities to the greatest extent possible, grating for packaging must be carried out in the area of production and the packaging of the grated cheese must take place immediately, without any treatment or the addition of any substances such as used to modify the preservability of other cheeses.

A cheese aged only 6 months cannot possibly compare to a cheese aged 12 months. The difference in flavor is enormous. Decreasing the present FDA 10-month aging standard for curing time by 40% will not promote honesty and fair dealings in the interest of consumers. The preservation of the naturalness of Parmigiano Reggiano is an important attribute of its ability to age for a long period of time, thus developing the balance of flavors and aromas that make it unique in the world. Proper aging is what gives birth to the flavors and aromas consumers expect.

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It is respectfully submitted that there is no need for, and it is inappropriate to amend the aging standard. As the FDA is well aware, international negotiations are presently being conducted at the World Trade Organization to determine the appropriateness of recognizing Geographical Indications (GI) and Protected Designations of Origin (PDO) for food products produced in the United States as well as other countries. Adopting the proposed change in production technique will further harm the reputation of Parmesan cheese, one of the most famous Geographical Indications, recognized as a Protected Designation of Origin by the 25 member States of the European Union and the 23 member States belonging to the Lisbon Union, the union of countries which have ratified the Lisbon Agreement for the Protection of Appellations of Origin. Cheese produced under a 6-month aging process may be produced faster, in greater quantities and for a cheaper price, as the Petition advocates, but it will not be Parmesan cheese.

The protection of Parmigiano Reggiano as a Geographical Indication is a commitment of the U.S. government by virtue of what is agreed upon in Article 22.2 of the TRIPS Agreement. A change in the aging standard by the FDA during international negotiations on the recognition of Geographical Indications and Protected Designations of Origins, by acting on a petition that has been dormant for over 5 years, is untimely.

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There simply is no need to act on this Petition at the present time. Deferring such a decision in view of the continuing World Trade Organization negotiations would appear to be a better course of action.

Respectfully submitted,

CONSORZIO DEL FORMAGGIO PARMIGIANO-REGGIANO

By

Andrea Bonati, President



- CC European Commission
- Directorate General for Agriculture
 - Directorate General for Trade
 - Directorate General for Health and Consumer protection
- CC Delegation of the European Commission to the United States
- CC Italian Ministry of Agricultural Policies – Directorate General for quality of agricultural products and foodstuff and consumer protection
- CC Embassy of Italy in the United States