

January 9, 2005

Ms. Loretta Carey  
Division of Standards and Labeling Regulations  
Office of Nutritional Products, Labeling and Dietary Supplements  
Center for Food Safety and Applied Nutrition (HFS-822)  
5100 Paint Branch Pkwy  
College Park, MD 20740

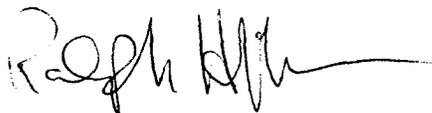
Dear Ms. Carey:

Enclosed are the changes to our labels that you requested. I have enclosed the proofs which should show the changes. Of note, we are not able to increase the font size on the Blue Cello Triangle label as all information will not fit. This is a repack label that we enclose in a box for our retail customers who pack random weight items. A summary of the changes are below:

Trifoglio Grated Parmesan – Bold % Daily Value and Amount Per Serving  
Arrezzo – Pure Grated Parmesan Cheese -- Removed 10 Months Aged statement  
Arrezzo – Grated Italian Combo Cheese - Bold % Daily Value and Amount Per Serving  
Cello – Shredded Imported Parmesan Cheese - Bold % Daily Value and Amount Per Serving  
Bella Rosa -(3) Removed wording related to “Fresh” and reference to 10 month aging

Please let me know if you require additional information

Sincerely,



Ralph Hoffman  
Director of Supply Chain

98P-1121

SUP 1

ed. 137

**Arthur Schuman Inc.**

10 New Branch Lane • Fairfield, New Jersey 07004

February 23, 2005

Ms. Loretta Carey  
Division of Standards and Labeling Regulations  
Office of Nutritional Products, Labeling and Dietary Supplements  
Center for Food Safety and Applied Nutrition (HFS-822)  
5100 Paint Branch Pkwy  
College Park, MD 20740

Dear Ms. Carey:

Enclosed are the changes to our labels that you requested. I have enclosed the proofs which should show the changes. Of note, we are not able to increase the print size on the Arrezzo Pure Grated Parmesan Cheese without the image becoming blurred. The following is attached:

Arrezzo – Grated Italian Combo Cheese – Larger size  
Trifoglio (3) – Increased the font size of the Net Weight  
Border – Removed “Fresh” from the label (original label on paper)

Please let me know if you require additional information

Sincerely,



Ralph Hoffman  
Director of Supply Chain

Randomly weighed

Arthur Schuman Inc.  
Fairfield, NJ 07004

Ingredients: Pasteurized  
condensed milk, cream, sugar,  
table salt, cheese cultures,  
whey, rennet, stabilizers.

CONTAINS MILK

PREMIUM SELECTION  
**CELLO**  
*Old World Traditional Flavor*



**ITALIAN COMBO**  
SUPERIOR QUALITY CHEESE

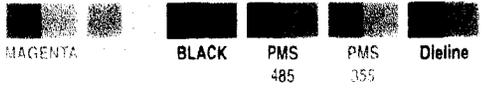
KEEP REFRIGERATED

Nutrition Facts:



**Buitoni**<sup>®</sup>

Freshly Shredded  
**PARMESAN CHEESE**



global imaging resource network  
**SCHWAB** SSP# 528246 07-07-05  
Saint Paul Sauce 15oz\_cc3\_ZSP

Curved die artwork goes into

**Freshly Shredded  
Parmesan Cheese**

Nutrition Facts		Amount/serving	%DV*	Amount/serving	%DV*
Serv. Size 1 Tbsp (5g)		<b>Total Fat</b> 1.5g	2%	<b>Total Carb.</b> 0g	0%
Servings About 28		Sat. Fat 1g	5%	Fiber 0g	0%
<b>Calories</b> 20		Trans Fat 0g		Sugars 0g	
Fat Cal. 10		<b>Cholest.</b> 5mg	1%	<b>Protein</b> 2g	
		<b>Sodium</b> 60mg	2%		
		Vitamin A 0% • Vitamin C 0% • Calcium 4% • Iron 0%			

\*Percent Daily Values (DV) are based on a 2,000 calorie diet.

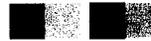
**INGREDIENTS:** PARMESAN CHEESE (PASTEURIZED MILK, CHEESE CULTURES, SALT, ENZYMES), NATAMYCIN TO PROTECT FLAVOR.

DISTRIBUTED BY BUITONI FOODS, SOLDI, 01144138 USA. © BUITONI FOODS 268946



Celebrate Simple Italian Goodness.

Contact Us  
1-800-727-0050  
BUITONI FOODS  
www.buitoni.com



PMS    Diefine  
356

global imaging resource network

**SCHAWK** SSP# 528246 07-11-05  
Saint Paul Parmesean Cheese Back



4"

4"

KEEP REFRIGERATED

**Nutrition Facts**

Serving Size 1 Tbsp (5g)  
Servings Per Container: 378

**Amount Per Serving**

**Calories 20** Calories from Fat 15

% Daily Value\*

Total Fat 1.5g	2%
Saturated Fat 1.0g	5%
Trans Fat 0g	
Cholesterol 4mg	1%
Sodium 30mg	1%
Total Carbohydrates 0g	0%
Dietary Fiber 0g	0%
Sugars 0g	
Protein 0g	0%

Vitamin A 0% • Vitamin C 0%

Calcium 6% • Iron 0%

\*Percent Daily Values are based on a diet of 2,000 calories a day. Your daily values may be higher or lower depending on your calorie needs:

	Calories	2,000	2,500
Total Fat	Less than	65g	80g
Sat Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Total Carbohydrates		300g	375g
Dietary Fiber		35g	30g

Calories per gram:  
Fat 9 • Carbohydrate 4 • Protein 4



**GRATED ITALIAN BLEND**

INGREDIENTS: PASTEURIZED COW'S MILK AND/OR SHEEP'S MILK, CHEESE CULTURES, SALT AND ENZYMES CONTAINS: MILK

MARKETED BY INDEPENDENT MARKETING ALLIANCE, HOUSTON, TX 77079

NET WT. 5 LBS. (2.27kg)



die line does not print

4"



**GRATED PARMESAN  
CHEESE**

INGREDIENTS: PASTEURIZED COW'S MILK,  
CHEESE CULTURES, SALT AND ENZYMES  
CONTAINS: MILK

MARKETED BY INDEPENDENT MARKETING ALLIANCE, HOUSTON, TX 77079

NET WT. 5 LBS. (2.27kg)

KEEP REFRIGERATED

**Nutrition Facts**

Serving Size 1 Tbsp (5g)  
Servings Per Container: 378

**Amount Per Serving**

Calories 20    Calories from Fat 15

% Daily Value\*

Total Fat 1.5g    2%

Saturated Fat 1.0g    5%

Trans Fat 0g

Cholesterol 4mg    1%

Sodium 30mg    1%

Total Carbohydrates 0g    0%

Dietary Fiber 0g    0%

Sugars 0g

Protein 2g    4%

Vitamin A 0% • Vitamin C 0%

Calcium 6% • Iron 0%

\*Percent Daily Values are based on a diet of 2,000 calories a day. Your daily values may be higher or lower depending on your calorie needs:

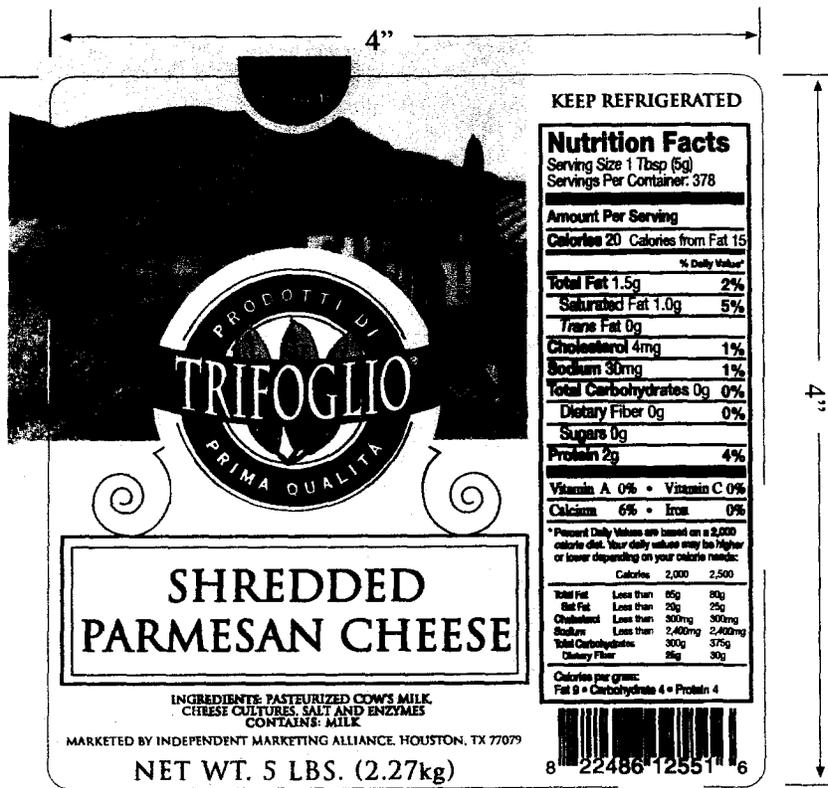
	Calories	2,000	2,500
Total Fat	Less than	65g	80g
Sat Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Total Carbohydrates		30g	37g
Dietary Fiber		35g	35g

Calories per gram:  
Fat 9 • Carbohydrate 4 • Protein 4



4"

die line  
does not print



4"

4"

KEEP REFRIGERATED

**Nutrition Facts**

Serving Size 1 Tbsp (6g)  
Servings Per Container: 378

**Amount Per Serving**  
Calories 20 Calories from Fat 15

	% Daily Value*
<b>Total Fat</b> 1.5g	2%
<b>Saturated Fat</b> 1.0g	5%
<b>Trans Fat</b> 0g	
<b>Cholesterol</b> 4mg	1%
<b>Sodium</b> 30mg	1%
<b>Total Carbohydrates</b> 0g	0%
<b>Dietary Fiber</b> 0g	0%
<b>Sugars</b> 0g	
<b>Protein</b> 2g	4%

**Vitamin A** 0% • **Vitamin C** 0%  
**Calcium** 6% • **Iron** 0%

\*Percent Daily Values are based on a diet of 2,000 calories per day. Your daily values may be higher or lower depending on your calorie needs:

	Calories	2,000	2,500
<b>Total Fat</b>	Less than	65g	80g
<b>Sat Fat</b>	Less than	20g	25g
<b>Cholesterol</b>	Less than	300mg	300mg
<b>Sodium</b>	Less than	2,400mg	2,400mg
<b>Total Carbohydrates</b>		300g	375g
<b>Dietary Fiber</b>		25g	30g

Calories per gram:  
Fat 9 • Carbohydrate 4 • Protein 4

**SHREDDED PARMESAN CHEESE**

INGREDIENTS: PASTEURIZED COW'S MILK, CHEESE CULTURES, SALT AND ENZYMES  
CONTAINS: MILK

MARKETED BY INDEPENDENT MARKETING ALLIANCE, HOUSTON, TX 77079

NET WT. 5 LBS. (2.27kg)



die line does not print

# Your Proof **IMPORTANT! ....PLEASE READ**

Enclosed is a proof for your inspection. This proof does not show quality of paper or exact colors to be used. It is sent to avoid printing errors and shows style and arrangement of type and related work as will appear in your final printed job. We assume no responsibility for errors not corrected on proof provided. Please read carefully and check entire proof for spelling, position, context and related matter. If there are changes, please mark clearly and accurately. If paper, ink, or job related samples are enclosed check to see that they meet your requirements. Client changes in copy and related work when proof is submitted should be avoided whenever possible. Unnecessary changes can be costly to you and may delay final delivery. Requested changes by client will be charged for. This order is now off our production schedule!

**Please return this proof promptly so we may reschedule to meet your projected delivery date.**

Proof 1 Item

**LABEL SIZE: 4" x 4" - Die cut**

**3/c - 872 Gold, 159 Orange, Black**

**Nutrition Facts**  
Serving Size: 1 tbsp. (approx. 5g)  
Servings Per Container: 63

Amount Per Serving		Calories 20		Calories from Fat 10	
		% Daily Value*			
Total Fat	1.0g		2%		
Saturated Fat	1.0g		5%		
Trans Fat	0g				
Cholesterol	5mg		2%		
Sodium	50mg		2%		
Total Carbohydrate	0g		0%		
Dietary Fiber	0g		0%		
Sugars	0g				
Protein	4.0g				
Vitamin A	0%	Vitamin C	0%		
Calcium	4%	Iron	0%		

\* Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:  
Calories 2,000 2,500

Total Fat	Less than 65g	80g
Sat Fat	Less than 20g	25g
Cholesterol	Less than 300mg	300mg
Sodium	Less than 2,400mg	2,400mg
Total Carbohydrate	300g	375g
Dietary Fiber	25g	30g

Calories per gram:  
Fat 9 • Carbohydrate 4 • Protein 4

Ingredients: Part-Skimmed Pasteurized Cow's Milk, Cultures, Salt, Enzymes.  
**CONTAINS: MILK**

DieLine - F.P.O.



**Double Check your proof!**

**Please reply email or fax for approval.**

<b>Client: BRANDYWINE PKG</b>		<b>Date Proofed: 12-1-05</b>	<b>Back-up: 233/pc</b>
<b>Jacket # 118829</b>	<b>P.O.# -</b>	<input type="checkbox"/> I Have Found This Proof Satisfactory OK to Print As Shown	
<b>Approved by:</b>	<b>Date:</b>	<input type="checkbox"/> I Have Found This Proof Needs Revisions <input type="checkbox"/> Make Correction Noted <input type="checkbox"/> Requires Another Proof	

KEEP REFRIGERATED  
 CONSERVARE IN FRIGORIFERO  
 33°F - 40°F



**IMPORTED**  
**GRATED PARMESAN CHEESE**  
**FORMAGGIO PARMAGIANO GRATTUGGIATO**

**NET WT 5 LB (METRIC WT 2.27kg)**  
**PESO NETTO 5 LB (PESO NETTO kg 2,27)**



**Nutrition Facts/Dati Nutritivi**

Serving Size/Porzione 1 Tbsp (5g)  
 Serv. Per Cont. Approx./Porz. Per Cont. 454

Amount Per Serving/Quantità per Porzione	
Calories/Calorie 20	Calories from Fat/Calorie di Grassi 15
% Daily Value* /% Valore Giornaliero*	
<b>Total Fat/Totale Grassi</b> 1.5g	<b>2%</b>
Saturated Fat /Grassi Saturi 1g	<b>5%</b>
Trans Fat 0g: Fat 0g del Transpoto	
<b>Cholesterol/Colesterolo</b> 4mg	<b>1%</b>
<b>Sodium/Sodio</b> 30mg	<b>1%</b>
<b>Total Carbohydrate/Totale Carboidrati</b> 0g	<b>0%</b>
<b>Protein/Proteina</b> 2g	<b>4%</b>

Calcium/Calcio 6%  
 Not a significant source of dietary fiber, sugars, Vitamin A, Vitamin C and Iron. Non è una fonte significante di Fibre Alimentare, zucchero, Vitamina A, Vitamina C y Ferro.

\*Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs.  
 \*Le Percentuali Giornalieri sono calcolate in base ad una dieta de 2,000 calorie. I vostri valori giornalieri potrebbero essere più alti o più bassi secondo il vostro fabbisogno.

	Calories/Calorie: 2,000	2,500
Total Fat/Totale Grassi	Less than/Meno di 65g	80g
Sat. Fat/Grassi Saturi	Less than/Meno di 20g	25g
Cholesterol/Colesterolo	Less than/Meno di 300mg	300mg
Sodium/Sodio	Less than/Meno di 2,400mg	2,400mg
Total Carbohydrate/Totale Carboidrati	300g	375g
Dietary Fiber/Fibre Alimentare	25g	30g

Calories per gram/Calorie per gramo:  
 Fat/Grassi 9 • Carbohydrate/Carboidrati 4 • Protein/Proteina 4

INGREDIENTS: PASTEURIZED COW'S MILK, CHEESE CULTURES, SALT, ENZYMES.  
 CONTAINS MILK

INGREDIENTI: LATTE VACCINO PASTORIZZATO, FERMENTI LATTICI, SALE, ENZIMA.  
 INGREDIENTI: LATTE

KEEP REFRIGERATED  
 CONSERVARE IN FRIGORIFERO  
 33°F - 40°F



**GRATED ITALIAN COMBO CHEESE**  
**A BLEND OF PARMESAN AND ROMANO CHEESE**  
**MISCUGLIO DI PARMIGIANO E ROMANO GRATTOGGIATO**

**NET WT 5 LB (METRIC WT 2.27kg)**  
**PESO NETTO 5 LB (PESO NETTO kg 2.27)**



**Nutrition Facts/Dati Nutritivi**

Serving Size/Porzione 1 Tbsp (5 g)  
 Serv. Per Cont. Approx./Porz. Per Cont. 378

Amount Per Serving/Quantità per Porzione	
Calories/Calorie 20	Calories from Fat/Calorie di Grassi 15
% Daily Value* /% Valore Giornaliero*	
<b>Total Fat/Totale Grassi</b> 1.5g	<b>2%</b>
Saturated Fat /Grassi Saturi 1g	<b>5%</b>
Trans Fat / Fat del Transposto 0g	
<b>Cholesterol/Colesterolo</b> 4mg	<b>1%</b>
<b>Sodium/Sodio</b> 30mg	<b>1%</b>
<b>Total Carbohydrate/Totale Carboidrati</b> 0g	<b>0%</b>
<b>Protein/Proteina</b> 2g	<b>4%</b>

Calcium/Calcio 6%

Not a significant source of dietary fiber, sugars, Vitamin A, Vitamin C and Iron. Non è una fonte significativa di Fibra Alimentare, Vitamina A, Vitamina C y Ferro.

\*Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs.

\*La Percentuali Giornalieri sono calcolate in base ad una dieta de 2,000 calorie. I vostri valori giornalieri potrebbero essere più alti o più bassi secondo il vostro fabbisogno

	Calories/Calorie: 2,000	2,500
Total Fat/Totale Grassi	Less than/Meno di 65g	80g
Sat. Fat/Grassi Saturi	Less than/Meno di 20g	25g
Cholesterol/Colesterolo	Less than/Meno di 300mg	300mg
Sodium/Sodio	Less than/Meno di 2,400mg	2,400mg
Total Carbohydrate/Totale Carboidrati	300g	375g
Dietary Fiber/Fibre Alimentare	25g	30g

Calories per gram/Calorie per gramo:  
 Fat/Grassi 9 • Carbohydrate/Carboidrati 4 • Protein/Proteina 4

**INGREDIENTS: PASTEURIZED COW'S MILK, AND/OR SHEEP'S MILK, CHEESE CULTURES, SALT, ENZYMES.**

**CONTAINS: MILK**

**INGREDIENTI: LATTE VACCINO E/O LATTE OVINO PASTORIZZATO, FERMENTI LATTICI, SALE, ENZIMA.**

**INGREDIENTE: LATTE**

6 1/2"

10"

✓ Bill Laker  
OK

# LEPRINO

Item:



ARG07102LEP

**SHREDDED PARM/ROM/PEC BLEND**

Lot Code:



12345678

Pack Size:

2 X 15 LBS

Net Pounds:



30

Pack Date:

12/21/04

Ingredients: Romano (Part Skim Milk, Rennet, Salt, and Enzymes)

Parmesan (Pasteurized Part Skim Cow's Milk, Rennet, Salt, Enzymes)

Pecorino (Sheeps, Milk, Rennet, and Salt)

arthur schuman inc., 40 new dutch lane, fairfield, nj 07004

973 227-0030 [www.arthurschuman.com](http://www.arthurschuman.com)

Build Label  
OK

**LUIGINOS SPECIFICATION #: 900643**

**Item:**



**ARG0900643L**

**FRESH GRATED PARMESAN CHEESE**

**Lot Code:**



**12345678**

**Pack Size:**

**2 X 25 LBS.**

**Net Pounds:**



**50**

**Pack Date:**

**03/30/04**

INGREDIENTS: PASTEURIZED PART-SKIM MILK, CHEESE CULTURES,  
SALT, ENZYMES, POWDERED CELLULOSE TO PREVENT CAKING

ARTHUR SCHUMAN INC., 40 NEW DUTCH LANE, FAIRFIELD NJ 07004  
973.2270030 WWW.ARTHURSCHUMAN.COM

Bill Label  
OK

# CELLO

Item:   
CEL07610

## CELLO GRATED PARMESAN

Lot Code:   
12345678

Pack Size: 6 X 5 LBS.

Net Pounds:   
30

Pack Date: 02/14/04

INGREDIENT: PASTEURIZED COW'S MILK CHEESE CULTURES  
SALT AND ENZYMES.

ARTHUR SCHUMAN INC., 40 NEW DUTCH LANE FAIRFIELD NJ 07004  
973 227-0030 WWW.ARTHURSCHUMAN.COM

✓ Full label  
OK

# CELLO

Item:



CEL07612

## CELLO GRATED PARMESAN

Lot Code:



50740301

Pack Size:

2 X 5 LBS

Net Pounds:



10

Pack Date:

01/10/05

INGREDIENTS: PASTEURIZED COW'S MILK, CHEESE CULTURES,  
SALT AND ENZYMES.

arthur schuman inc., 40 new dutch lane, fairfield, nj 07004  
973.227.0030 www.arthurschuman.com

Bill Label  
OK

## CUSTOM FOODS

Item:   
ARG07204138CF

**FRESH GRATED PARMESAN CHEESE**

Lot Code:   
12345678

Pack Size: 2 X 15 LBS.

Net Pounds:   
30

Pack Date: 03/23/04

INGREDIENTS: PASTEURIZED PART-SKIM MILK, CHEESE CULTURES,  
SALT, ENZYMES, POWDERED CELLULOSE TO PREVENT CAKING

ARTHUR SCHUMAN INC. 40 NEW DUTCH LANE, FAIRFIELD NJ 07804  
973.227.0030 WWW.ARTHURSCHUMAN.COM

✓ Bill [unclear]  
ok

# CELLO

Item:



CEL07565

**CELLO GRATED PARMESAN 12/8 OZ CUPS**

Lot Code:



12345678

Pack Size:

12 X 8 OZ

Net Pounds:



6

Expiration Date:

07/25/05

INGREDIENTS: PASTEURIZED COW'S MILK, CHEESE CULTURES, SALT, ENZYMES

arthur schuman inc., 40 new dutch lane, Fairfield nj 07004

973 227-0030 www.arthurschuman.com

Bill  
OK

IMPORTED GRATED PARMESAN 2/15 # D-27668

Item:



ARG07108

Lot Code:



2345678

Pack Size:

2 X 15 Lbs.

Net Pounds:



30

Pack Date:

1 01 04

INGREDIENTS: PASTEURIZED PART-SKIM MILK, CHEESE CULTURES  
SALT, AND ENZYMES

arthur schuman Inc., 40 new dutch lane, fairfield, nj 07004  
973.227.0030 [www.arthurschuman.com](http://www.arthurschuman.com)

# ARG0751400VDK

Item:   
ARG0751400VDK

SPEC # 51410 FRESH GRATED PARM/ROM

Lot Code:   
50590401

Pack Size: 2 X 15 LB.

Net Pounds:   
30

Pack Date: 02/28/05

INGREDIENTS: PASTEURIZED COWS MILK, RENNET, SALT  
AND CELLULOSE (ANTI-CAKING AGENT)

arthur schuman inc., 40 new dutch lane, Fairfield nj 07004  
973 227-0030 www.arthurschuman.com

Full list  
OK

**BORDENS GRATED PARMESAN**  
**BFC INGREDIENT NUMBER: 80220**  
**DOMESTIC PARMESAN CHEESE GRATED**

**Item:**   
**ARG07142BOR**

**Lot Code:**   
**60400401**

**Pack Size:** **2 X 25 LBS**

**Net Pounds:**   
**50**

**Exp Date:** **05/10/06**

**Pack Date:** **02/09/06** **PO# 54288**

**INGREDIENTS: PASTEURIZED PART SKIM MILK, CHEESE CULTURES,  
SALT, ENZYMES AND CELLULOSE (ANTI-CAKING AGENT),  
arthur schuman inc, 40 new dutch lane, Fairfield nj 07004  
973 227-0030 [www.arthurschuman.com](http://www.arthurschuman.com)**

**Carey, Loretta A**

---

**From:** Ralph Hoffman [rhoffman@arthurschuman.com]  
**Sent:** Wednesday, June 08, 2005 4:43 PM  
**To:** Carey, Loretta A  
**Subject:** Amendment to TMP Permit Request Dated April 18, 2005

We have revised the first paragraph of our TMP Permit request dated April 18, 2005 with the following text.

"..In accordance with 21 CFR 130.17(i), and the notice appearing in the Federal Register of December 29, 2000 (65 FR 83040) (Docket No. 98P-1121), pertaining to an extension of a temporary permit to Kraft Foods for market testing Parmesan Cheese, Arthur Schuman Inc. hereby notifies the Food and Drug Administration that the Company accepts the invitation to participate in the extended market test of Parmesan Cheese..."

I have also attached the application without the appendicies in the PDF file. If you require additional information, please do not hesitate to call.

Thank you

**Ralph Hoffman**  
Director of Supply Chain  
Arthur Schuman Inc  
[rhoffman@arthurschuman.com](mailto:rhoffman@arthurschuman.com)  
(973) 227-0030 x 157

Loretta Carey  
Division of Standards and Labeling Regulations  
June 8, 2005  
Page 3 of 6

**Application for an Extension of a Temporary Marketing Permit to Kraft Foods for Market Testing under 21 CFR § 130.17 (Docket No. 98P-1121): To Participate in the Extended Market Test of Parmesan Cheese**

**1. Name & Address of Applicant:**

Arthur Schuman Inc.  
40 New Dutch Lane  
Fairfield, NJ 07004  
Tel. 973-227-0030

**2. Producing the Food Involved:** Arthur Schuman Inc. is regularly engaged in the production of grated parmesan cheese at several facilities throughout the United States.

**3. Reference to Applicable Standards:** Arthur Schuman Inc. requests a temporary permit to market test grated Parmesan cheese aged for six months versus Parmesan cheese aged for ten months. The applicable standard for Parmesan cheese is listed in 21 CFR § 133.165. The applicable standard for grated cheese is listed in 21 CFR § 133.146.

**4. A Full Description of the Proposed Variation:** The proposed grated Parmesan cheese we wish to market will conform to the Parmesan cheese standard in every respect—except as to age. It will continue to be made by a general procedure set forth in § 133.165 (b) for Parmesan cheeses. It will retain its characteristic granular, Parmesan texture. It will grate readily. It will contain no more than 32% moisture and its solids will contain no less than 32% milkfat, as determined by the method prescribed in § 133.5 (a), (b), and (d). Only as to curing time—six months versus the currently required ten months—will it deviate from the existing Parmesan cheese standard. Our method for making this product is attached as Exhibit A.

**5. Basis on which Food is believed to be Wholesome:** The grated Parmesan cheese aged for six months for which we request the temporary permit is the same as our current Parmesan cheese aged for ten months as to flavor, texture, and nutritional characteristics.

It is also as wholesome as Parmesan cheese aged for ten months or for that matter other cheeses currently being marketed in the retail food service and ingredients market places.

We tested for nutritional equivalency by utilizing a respected, independent outside laboratory, Certified Laboratories, 200 Express Street, Plainview, NY 11803. The chemical analyses showed that our Parmesan cheese aged for six months was judged nutritionally equivalent on RDI or DRV (daily) values to our current Parmesan aged ten months—relative to fat, protein, calcium, sodium, and other nutritional characteristics. Our Parmesan cheese aged for six months also complied with the current standard of identity requirements for Parmesan cheese, with the exception of the aging requirement.

Loretta Carey  
Division of Standards and Labeling Regulations  
June 8, 2005  
Page 5 of 6

With lesser amounts of money being tied-up in inventory costs, 'barriers to entry' relative to the production of Parmesan cheese will also be lowered allowing for entry of new Parmesan cheese manufacturers—thereby creating new and additional competition in the marketplace.

**9. Proposed Labels:** Attached to this application please find our proposed labels for our Parmesan cheese aged for six months. The labels reflect each size in which we sell grated Parmesan cheese and request that the temporary permit cover. Since a majority of our current labels for Parmesan cheese do not refer to a ten-month aging, there is no need to reference on the proposed labels, a change to the new six-month aging period (See Exhibit C). However, we currently have three labels that specifically list the "10 Month" aging. Upon approval of the permit, we will change our artwork to reflect the 6 month aging or remove the declaration from the label.

**10. Time Period covered by the Temporary Marketing Permit:** Arthur Schuman Inc. desires to test the Parmesan cheese aged for six months in interstate commerce, involving retail, food service, and industrial/ingredient channels of business for a period of 15 months. We would like this period to begin immediately upon approval of this request. We need a period of this duration to adequately measure the dynamics of customer and consumer response among both our current customer base and potential new customers.

The nature and uncertainty of the food service and ingredients markets are often characterized by infrequent or irregular order patterns and cycles. Also, the myriad of end-use products that our Parmesan cheese is used in and the frequent customer testing (of new products) before (their) release as a retail product necessitates a testing period of this duration. This will allow for a large enough sample of marketplace conditions to validly evaluate customer and consumer marketplace acceptance.

**11. Probable Amount of Product Distributed:** The probable amount of Parmesan cheese aged for six months that we will distribute for testing purposes during this requested 15 month period will be up to 40 million pounds. We need to test this product in the retail/consumer market, food service, and in the industrial/ingredients markets—among customers of significant size that are national in distribution. Additionally, manufacturing and production efficiencies dictate a test of this size and scope.

**12. Areas of Distribution:** The Parmesan cheese aged for six months will be distributed throughout the United States.

**13. Manufacturing Address:** The Parmesan Cheese will be grated and shredded by Arthur Schuman Inc., at 40 New Dutch Lane, Fairfield, NJ 07004 and distributed by Arthur Schuman Inc., from 145 Talmadge Road, Edison, NJ 08817.

**14. Distribution in State of Manufacture:** The Parmesan cheese aged for six months will be distributed by Arthur Schuman Inc. in the states of its manufacture.

Loretta Carey  
Division of Standards and Labeling Regulations  
June 8, 2005  
Page 4 of 6

The product itself has the same nutritional characteristics as Parmesan cheese aged for ten months and is as wholesome and nondeleterious as the current standard of identity Parmesan cheese. The curing enzyme used is safe and suitable for cheese-making with a long history of use in cheese-making. No novel ingredients or processes are used in its manufacture.

The amount of aging time in Parmesan cheese does not contribute positively or negatively to the product's wholesomeness and nondeleteriousness. Aging of a Parmesan cheese has historical precedence only as a means to develop presumably desirable flavor and textural characteristics—two characteristics we have been able to obtain in the proposed Parmesan cheese of six months age.

**6. The Amount of any New Ingredient to be Added:** We have made a Parmesan cheese aged for six months which has the taste, texture, and nutritional characteristics of the current standard of identity Parmesan cheese with no change in basic ingredients required by the standard. Additionally, no novel ingredients make procedures or manufacturing processes have been used. The only change made in the development of this product is the use of another enzyme—an enzyme commonly used in cheese-making with an ongoing history of safe and suitable use.

The product will still be comprised of pasteurized milk, salt, cultures and enzymes. We will only be using a different enzyme in addition to the one we use in our current Parmesan—which is aged for the presently required ten months. We will be doing this to develop the characteristic Parmesan flavor notes at an earlier age.

**7. Purpose of Effecting the Variation:** We are requesting this temporary permit to test market this shorter aged (six-month) Parmesan cheese so that we can collect data on customer and consumer acceptance. These data will be used in a subsequent petition to amend the current standard of identity for Parmesan cheese as to the aging requirement.

As stated earlier, we believe that with today's technology, it is no longer necessary to cure a Parmesan cheese for ten months to obtain the taste, texture and functionality that are commonly expected from Parmesan cheese. We believe the testing that we have done to date, both internally and externally, validates this claim. This proposed market test period and the resultant customer and consumer feedback will further validate this claim.

**8. Statement of How Variation is of Potential Advantage:** The proposed variation in the aging requirement for Parmesan cheese benefits consumers and end-users alike by ultimately lowering the cost of the product without a sacrifice in flavor, texture or nutrition. Aging and inventorying costs will be lower—creating an environment where total product costs will be lower—thereby allowing an opportunity for cheese manufacturers to better hold the line on costs to the ultimate consumer.

Loretta Carey  
Division of Standards and Labeling Regulations  
June 8, 2005  
Page 6 of 6

**15. Why Not Distributed in State of Manufacture:** Not applicable. Product will be distributed in states of manufacture.

**16. Reasons for Distribution into Other States:** Given our current production and distribution methods, it is not generally possible for a large producer to limit the distribution of a product to a single state or a small geographic area. From an industrial or food service perspective, we cannot control where our customers use and sell our product. However, it will allow this product to be adequately tested across a wide range of products, recipe applications and diverse consumer markets—thereby ensuring valid and projectible results.

In summary, we ask the FDA to consider favorably this application and the attached data to grant approval for a temporary permit to test market our six-month aged Parmesan cheese. This would serve as an initial step to be followed by a later petition to amend the aging requirements found in the current Parmesan Standard 21 CFR § 133.165.

Please feel free to contact me at 973-227-0030 Ext. 157 if you require additional information or assistance of any kind.

Respectfully Submitted,



Ralph Hoffman  
Director of Supply Chain  
Arthur Schuman Inc.