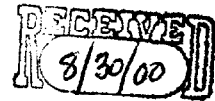




Kraft Foods

Rec'd 2/13/0

J. Edward Thompson  
Chief Food Law Counsel



August 28, 2000

Felicia Satchell, Chief  
Food Standards Branch (HFS-158)  
Division of Programs and Enforcement Policy  
Office of Food Labeling  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C Street, S.W.  
Washington, D.C. 20204

RE: Application for Extension of Temporary Permit  
Docket No. 98P-1121

Dear Ms. Satchell:

I am writing on behalf of Kraft Foods, Inc. pursuant to the provisions of 21 CFR Section 130.17 to request an extension of the temporary permit to test market grated parmesan cheese manufactured from parmesan cheese produced in conformance with the parmesan cheese standard, 21 CFR Section 133.165, except that it is produced with a minimum curing time of 6 months rather than the 10 months currently required by the parmesan cheese standard of identity. The temporary permit was issued on April 6, 1999 to commence no later than July 6, 1999.

During the period of the test market, our production and conversion facilities have been evaluating product to confirm that they can consistently meet the established taste, texture and other organoleptic benchmarks for grated parmesan cheese under the new process. The product has consistently met our requirements during shelf life evaluations.

Kraft has also monitored consumer reaction to the test product primarily by reviewing and evaluating consumer response data generated through our consumer resource information center. To date it appears that consumers are at least as satisfied with test product as they were with product produced with a ten-month cure. In fact, product complaints are down 9% in year 2000 as compared with the prior year on a complaints per MM units sold basis. Kraft will continue to evaluate this data as the majority of product produced under the permit is still well within the suggested shelf life

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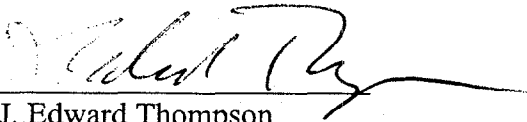
or still in our curing facilities. It will take to the end of the current year before we have an opportunity to evaluate finished product through a full seasonal cycle.

Concurrent with this request for an extension of the current permit, Kraft is filing a petition to amend the Parmesan Cheese standard to reduce the minimum curing time from 10 months to 6 months. A copy of that petition is enclosed.

While the form of the petition is simply to request that the minimum curing time be reduced from 10 months to 6 months, it occurred to us that it may make more sense, from an industry perspective as well as from the Agency's desire to minimize time spent on updating standards of identity, to move the curing requirement from a paragraph (a) identity requirement, to paragraph (b) make procedure. This may be preferable since it is certain that the industry will continue to refine the process to further reduce the required curing time to produce typical parmesan cheese. It is therefore likely that the agency will again be petitioned to further reduce the curing time within the foreseeable future. If paragraph (a) was revised to require use of pasteurized milk to preclude the survival of pathogenic organisms, the paragraph (b) sentence which now reads "The cheese is cured in a cool, ventilated room." could be revised to read: "The cheese is then cured in a cool, ventilated room for 10 months or until the characteristics of parmesan cheese have developed." This would be consistent with other ripened cheese standards, such as brick cheese, which recognizes the need for aging but does not prescribe a minimum cure time. We do not think leaving the appropriate time for aging to the expertise of the cheesemaker would negatively affect quality considering the competitiveness of the marketplace. I would be glad to discuss this further if you feel the agency would prefer this approach.

Please advise me if you need additional information or have any questions regarding our submission or the petition.

Respectfully submitted,  
KRAFT FOODS, INC.

  
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J. Edward Thompson  
Chief Food Law Counsel

Enclosure

SATCHELL.DOC