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The  
**Antigo**  
**Cheese**  
Company

907 9th Avenue  
P.O. Box 503  
Antigo, WI 54409-0503

Telephone  
(715) 623-2301  
1-800-356-5655  
FAX: (715) 623-4501

Web Site: [WWW.newnorth.net/antigo.cheese](http://WWW.newnorth.net/antigo.cheese)

May 25, 2000

Ms. Felicia Satchell  
Chief Foods Standards Branch  
Food & Drug Administration  
Office of Food and Labeling (HSS-158)  
Center for Food Safety and Applied Nutrition  
200 C. Street SW  
Washington DC 20204

Dear Ms. Satchell:

The purpose of this letter, pursuant to the provisions of 21CFR Section 130.17, is to request a temporary permit to produce and test market Parmesan Cheese produced by the make procedure described in the Parmesan Standard, 21CFR para. 133.165, with the exception that we propose to age the cheese for six-months instead of the standard ten months.

In order to achieve the texture, taste and functional characteristics of a cheese that has aged for ten months we add an additional safe and suitable enzyme (which has been recognized as safe for use in foods including cheese). Attached is a copy of our proprietary make procedure for Parmesan cheese which is aged for six months.

The reasons we are applying for this temporary permit to market six months old Parmesan cheese are as follows:

1. Our customers are requesting a six-month Parmesan to meet competitive situations.
2. Six-month Parmesan is as nutritionally equivalent and safe as a ten month Parmesan.
3. Curing and holding periods required to produce a ten month Parmesan are quite expensive. A six month cheese enables us to reduce our costs which in turn will reduce the costs to the consumer. We find and our tests confirm that the organoleptic properties

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of our six- month Parmesan are equivalent to our ten month Parmesan. Internal and external sensory evaluation and external nutritional analysis confirm that the nutritional equivalency of the two products are comparable. This test data is included with this application.

As required by 21CFR para. 130.17 we are submitting the following information for a temporary permit to produce and market Parmesan cheese aged for six-months which is identical in all aspects to the standard of identity for Parmesan cheese of ten months with the exception of the 4-months aging difference.

Upon your review, we request a TMP take effect upon date of issuance.

Upon the successful completion of our tests, we will propose the aged standard for Parmesan Cheese be reduced from ten months to six-months.

Thank you for your consideration of this request and application. Please call me at 715-623-2301 if you require any additional information.

Sincerely,



Leo Malone  
Sales/Marketing Manager

Enclosures

- 1) Applications pursuant to 21CFR paragraph 130.17
- 2) Parmesan Make Procedure
- 3) Proposed Label
- 4) Research and Tests Results

**Name of Address of Applicant**

The Antigo Cheese Company

907 9th Avenue

P.O. Box 503

Antigo, Wisconsin 54409-0503

**Statement Regarding Applicant Producing the Product**

**Antigo Cheese has produced and sold Parmesan Cheese to the retail, food service and ingredient distribution chains since 1993.**

## References to Applicable Standards of Identity

The Antigo Cheese Company requests temporary permit to produce and sell Parmesan Cheese which has been aged for six-months rather than the traditional ten months.

## Description of the Proposed Variation

The Parmesan Cheese we propose will be identical in all regards to standard Parmesan cheese except for the reduced storing time from ten months to six-months. Characteristics including texture, flavor and color will remain the same. Moisture will be at 32% maximum, minimum milk fat content of 32%, as determined by the method described in Section 133.5 (A)(B) and (D). Our make procedure for this proposed product is attached as Exhibit A.

## Basis for Belief that the Food is Wholesome

The wholesomeness, flavor, texture and nutritional characteristics of the six-month aged Parmesan we propose will be equivalent to our current ten month Parmesan cheese. No unique or novel ingredients or processes are involved in the production of this product. The additional enzyme used has been recognized as GRAS by FDA and has a long history of usage in cheese manufacture.

External sensory evaluation indicates the proposed Parmesan is organoleptically equivalent to our current ten month Parmesan cheese. (See Exhibit B)

Nutritional equivalency analysis was conducted by a reputable, independent laboratory, MVTL Laboratories, New Ulm Minnesota. The results show the proposed six month Parmesan to be nutritionally equivalent on DRV or RDI values to the current ten month Parmesan (See Exhibit C). The proposed six month Parmesan complies with the current standard of identity for Parmesan, with exception to the ten month aging requirement.

### **The Amount of Any New Ingredient and Deviation from the Standard**

The only deviation is the use of another enzyme which is commonly used in the cheese industry and has history of safe and suitable use with the advantage of a shorter curing period. No other new ingredients are proposed.



### **Purpose for the Variation from the Standard**

- 1) Response to customer requests.
- 2) To meet anticipated competitive situations, domestic and potential future threats regarding imported cheese with standards different from our own.
- 3) To take advantage of new enzymes and aging techniques.
- 4) To eventually petition amending the current standard of identity regarding the 10-month aging requirement.

### **Variations Advantage to the Consumer**

Lower production, aging and inventory costs which may be passed on to the consumer. Lower costs will enable small manufacturers, like Antigo Cheese, to be more competitive and thereby stimulate competition in the market place.

## **Test Timetable**

The Antigo Cheese requests the tests of six-month aged Parmesan for a period of 15 months upon approval of the request. This 15-month period will enable Antigo to evaluate our results within a similar time table granted to other applicants with this same type of cheese.

## **Probable Amount of Six-Month Parmesan to be Distributed**

**Up to 20 million pounds.**

## **Areas of Distribution**

We propose the six-month Parmesan will be distributed and sold throughout the United States.

### **Manufacturing Address**

The proposed product will be produced at The Antigo Cheese Company, 907 9<sup>th</sup> Avenue, Antigo, Wisconsin, 54409.

## **Distribution in the State of Manufacture**

The Parmesan Cheese we propose will be distributed in the state of Wisconsin.

### **Why-Not Distributed in a State of Manufacturer**

Not applicable. As noted above product will be distributed in the State of Wisconsin where we propose to manufacture.



### **Reasons for Distribution in to Several States**

Our customer base includes major marketers who sell our product nationally. They have requested this product and it would be impossible to limit the marketing of this proposed Parmesan to small geographic areas. This proposed test will allow our customers to test the product nationally and remain competitive in the marketplace.

## **EXHIBIT B**

**Results of external sensory evaluation showing the proposed six month Parmesan is statistically equivalent to ten month parmesan.**

## **EXHIBIT C**

Results of nutritional equivalency testing showing the proposed six month Parmesan is nutritionally equivalent to ten month Parmesan.



MINNESOTA VA

1126 N. Front St. - New Ulm  
1411 S. 12th St. - Bismarck,  
710 S. 14th St. - Grand Fork  
35 W. Lincoln Way - Nevada

LABORATORIES, INC.

557 - Fax 507-359-2890  
558 - Fax 701-258-9724  
45 - Fax 701-772-0028  
559 - Fax 515-382-3885



MATT DOCHTERMAN  
THE ANTIGO CHEESE COMPANY  
907 9TH AVE  
ANTIGO WI 54409-0503

Report Date: 24 Apr 2000

Lab Number: 00-M10000  
Work Order #: 3782  
Account Number: 001068

Date Sampled:  
Time Sampled:  
Date Received: 6 Apr 2000

Sample Description: 10 MONTH PARMESAN CHEESE

NUTRITIONAL INFORMATION PER 100 grams

Analyte	Result
Moisture	30.53 g
Ash	5.81 g
Calories	403.61 Kcal
Calories from Fat	261.1 Kcal
Total Fat	29.01 g
Fat, Saturated	18.42 g
Cholesterol	77.0 mg
Sodium	1016 mg
Total Carbohydrate Content	< 0.01 g
Sugars	< 0.2 g
Protein - Kjeld N x 6.38	35.63 g
Vitamin A	1782.8 IU
Vitamin C	5.1 mg
Calcium	1046 mg
Iron	0.268 mg

Original Results  
April 200

Approved by: Michael K. Grob  
Michael K. Grob, Laboratory Manager



- New Ulm, MN 56073 - 800-782-3557 - Fax 507-359-2890  
 - Bismarck, ND 58502 - 800-279-6885 - Fax 701-258-9724  
 Grand Forks, ND 58201 - 800-272-7645 - Fax 701-772-0028  
 ay - Nevada, LA 50201 - 800-362-0855 - Fax 515-382-3885



Report Date: 24 Apr 2000

MATT DOCHTERMAN  
 THE ANTIGO CHEESE COMPANY  
 907 9TH AVE  
 ANTIGO WI 54409-0503

Lab Number: 00-M9999  
 Work Order #: 3782  
 Account Number: 001068

Date Sampled:  
 Time Sampled:  
 Date Received: 6 Apr 2000

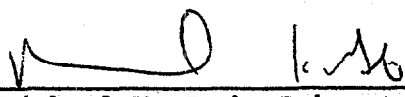
Sample Description: 6 MONTH PARMESAN CHEESE ENZYME ADDED

NUTRITIONAL INFORMATION PER 100 grams

Analyte	Result
Moisture	30.65 g
Ash	5.53 g
Calories	396.98 Kcal
Calories from Fat	255.1 Kcal
Total Fat	28.34 g
Fat, Saturated	18.18 g
Cholesterol	76.3 mg
Sodium	915.0 mg
Total Carbohydrate Content	1.33 g
Sugars	< 0.2 g
Protein - Kjeh N x 6.38	34.15 g
Vitamin A	1184.4 IU
Vitamin C	4.1 mg
Calcium	972.0 mg
Iron	< 0.247 mg

Chris

Original Results  
 April 2000

Approved by:   
 Michael K. Grob, Laboratory Manager

MVTL guarantees the accuracy of the analysis done on the sample submitted for testing. It is not possible for MVTL to guarantee that a test result obtained on a particular sample will be the same on any other sample unless all conditions affecting the sample are the same, including sampling by MVTL. As a mutual protection to clients, the public and ourselves, all reports are submitted as the confidential property of clients, and authorization of publication of statements, conclusions or extracts from or regarding our reports is reserved pending our written approval.

AN EQUAL OPPORTUNITY EMPLOYER

... MONIN cheese enables us to reduce our costs which in turn will...