

OTHER ACTS

EUROPEAN COMMISSION

Publication of an application for approval of an amendment, which is not minor, to a product specification pursuant to Article 50(2)(a) of Regulation (EU) No 1151/2012 of the European Parliament and of the Council on quality schemes for agricultural products and foodstuffs

(2023/C 202/13)

This publication confers the right to oppose the amendment application pursuant to Article 51 of Regulation (EU) No 1151/2012 of the European Parliament and of the Council ⁽¹⁾ within three months from the date of this publication.

APPLICATION FOR APPROVAL OF AN AMENDMENT TO THE PRODUCT SPECIFICATION OF PROTECTED DESIGNATIONS OF ORIGIN/PROTECTED GEOGRAPHICAL INDICATIONS WHICH IS NOT MINOR

Application for approval of an amendment in accordance with the first subparagraph of Article 53(2), of Regulation (EU) No 1151/2012**'PARMIGIANO REGGIANO'****EU No: PDO-IT-0016-AM06 — 2.12.2021****PDO (X) PGI ()****1. Applicant group and legitimate interest**

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The 'Parmigiano Reggiano' Cheese Consortium is formed by 'Parmigiano Reggiano' cheesemakers. It is entitled to submit an amendment application under Article 13(1) of Ministry of Agricultural, Food and Forestry Policy Decree No 12511 of 14 October 2013.

2. Member State or Third Country

Italy

3. Heading in the product specification affected by the amendment(s)

- Name of product
 Description of product

⁽¹⁾ OJ L 343, 14.12.2012, p. 1.

- Geographical area
- Proof of origin
- Method of production
- Link
- Labelling
- Other: packaging, Cow Feeding Rules

4. Type of amendment(s)

- Amendment to product specification of a registered PDO or PGI not to be qualified as minor in accordance with the third subparagraph of Article 53(2) of Regulation (EU) No 1151/2012.
- Amendment to product specification of registered PDO or PGI for which a Single Document (or equivalent) has not been published not to be qualified as minor in accordance with the third subparagraph of Article 53(2) of Regulation (EU) No 1151/2012

5. Amendment(s)

The *Cheesemaking Standard* has been divided into articles to make it more structured and facilitate consultation, as well as bringing it into line with the *Rules on Identity Markings* and the *Cow Feeding Rules*, which were already structured in articles.

'Description of product' heading

Cheesemaking Standard

— Article 1

In the first paragraph, the Italian word for 'skimmed' has been changed from *scremato* to *decremato*.

This amendment has been included in point 3.2 of the single document.

The term previously used, *parzialmente scremato*, means 'semi-skimmed', which might suggest a required percentage fat content, whereas the process of skimming the cream off the milk to make 'Parmigiano Reggiano' cheese is based on experience and artisan technique, rather than a specific value.

The reference to 'cows' in the first paragraph has been changed to 'dairy cows'.

This amendment has been included in points 3.2 and 3.3 of the single document.

The aim here was to align the terminology with Article 1 of the *Cow Feeding Rules*, which refers to the dairy herd as comprising all milking cows, dry cows and heifers from the sixth month of gestation.

The following sentence from the first paragraph: *The milk must not undergo any heat treatment and additives may not be used.*

has been amended to read:

The milk must not undergo any heat treatment or physical or mechanical treatments such as centrifugation, bactofugation or microfiltration, and additives may not be used.

This amendment has been partially included in point 3.2 of the single document.

This change aims to make it clear that the milk cannot be subject to any heat treatment, physical treatment or mechanical treatment by expressly mentioning physical and mechanical treatments too and giving some examples of banned processes, to emphasise that the milk must be raw and untreated when it is used.

— Article 4

In the first paragraph:

— The following sentence: *'Parmigiano Reggiano' has the following characteristics:*

has been amended to read:

'Parmigiano Reggiano' may not be subjected to any treatment that impairs its chemical/physical or organoleptic characteristics and has the following characteristics:

This amendment has been included in point 3.2 of the single document.

Verbal or graphical references to 'Parmigiano Reggiano' PDO or the protected name 'Parmesan' (Court of Justice of the European Union, Case C-132/05, 26 February 2008) can be found in the labelling, presentation or advertising of a great many pre-packaged compound, prepared and processed foods currently on the market, particularly within the EU. The use of such references has increased significantly, both because of the reputation of the name 'Parmigiano Reggiano' (or 'Parmesan') and because 'Parmigiano Reggiano' cheese is such a versatile ingredient that can be used in many food preparations. These products often present several problems, particularly because the ingredient referred to as 'Parmigiano Reggiano' or 'Parmesan' is not in fact 'Parmigiano Reggiano' but rather a semi-finished product made from 'Parmigiano Reggiano' but which no longer has the characteristics required by the product specification because the cheese has been subjected to specific treatments such as dehydration or freeze-drying, or mixed with other ingredients.

It is necessary to prevent the reputation of 'Parmigiano Reggiano' from being exploited through the use of the name for the sole purpose of adding value to a final food product containing a semi-finished product made from 'Parmigiano Reggiano'. However, with the rules currently in force, difficulties have been encountered on the EU market in attempting to put a stop to this use of the PDO 'Parmigiano Reggiano' or the protected name 'Parmesan' for products which, despite being made from 'Parmigiano Reggiano' are no longer compliant with the product specification. Accordingly, the text now specifically states that 'Parmigiano Reggiano' may not be subjected to any treatment that impairs its chemical/physical or organoleptic characteristics, with the aim of making it clear that any product obtained using such treatments may no longer be referred to as 'Parmigiano Reggiano' PDO.

This amendment has been made because of specific difficulties identified in solving the problems described above, due to the lack of any clear provision in the 'Parmigiano Reggiano' PDO product specification. The amendment is necessary because of the numerous unlawful uses of 'Parmigiano Reggiano' PDO taking place on the EU market as a result of the product's reputation. The purpose of this amendment is therefore to help to ensure that the authenticity and reputation of 'Parmigiano Reggiano' PDO are protected on the EU market.

In the first paragraph, amendments have been made to the characteristics of 'Parmigiano Reggiano' cheese:

- The following sentence: *wheels measure 35-45 cm in diameter across the flat faces and 20-26 cm high;*

has been amended to read:

wheels measure 35-43 cm in diameter across the flat faces and 20-26 cm high;

- The following sentence: *external appearance: natural straw-coloured rind;*

has been amended to read:

rind colour: natural straw colour, which may change over time;

These amendments have been included in point 3.2 of the single document.

For many years, the wheels of cheese produced weighed around 40 kg on average, corresponding to a diameter of 40 cm across the flat faces, and values were rarely even close to the maximum limit. In recent years, however, there has been a gradual tendency towards making increasingly larger cheeses, in some cases nearing the maximum permitted diameter of 45 cm. While they are within the limits laid down in the product specification, at these maximum dimensions the cheeses can weigh around 50 kg, creating serious problems in moving, cleaning and portioning them, as the machinery used for these processes is usually designed for the average dimensions. Therefore, the maximum diameter of the flat faces has been reduced from 45 to 43 cm in order to prevent the problems in such operations as a result of cheeses being made at a diameter close to the maximum currently permitted by the product specification. This amendment will reduce the weight of a wheel of 'Parmigiano Reggiano' by around 4 kg, without compromising its quality characteristics, bringing the total weight down to around 46 kg.

While the rind is usually a natural straw colour, fluctuations in environmental conditions during maturing (humidity, temperature) and the techniques used to clean cheeses and the frequency of cleaning can cause the rind colour to vary over the minimum 12-month maturing period. This means that the colour may not be uniform and can have some variation owing to natural causes, and the amendment has been made to make this clear.

The following has been inserted as a second paragraph: *For the textural characteristics of the cheese, reference should be made to the product categories defined in the Rules on Identity Markings.*

In order to ensure a more systematic reading of the product specification, the text now specifies that, in addition to the characteristics of 'Parmigiano Reggiano' cheese described and listed in Article 5 of the *Cheesemaking Standard*, account must also be taken of the textural characteristics (along with any permitted defects) defined and categorised in the *Rules on Identity Markings* section of the product specification, and more specifically in the *Product Categories* annex.

— Article 5

The first paragraph: *Grated 'Parmigiano Reggiano' and portions (with or without rind) must be packaged within the area of origin in order to guarantee quality, traceability and control.*

has been amended to read:

Grating, portioning and the subsequent packaging of grated 'Parmigiano Reggiano' and portions (with or without rind) must take place within the area of origin in order to guarantee quality, traceability and control.

This paragraph has been amended to match the terms already used in the second paragraph of point 3.5 of the single document.

The third paragraph: *As already established by the Prime Ministerial Decree of 4 November 1991, the designation of origin 'Parmigiano Reggiano' can also be used for grated cheese obtained exclusively from a whole cheese eligible for that designation of origin, provided that grating takes place within the cheesemaking area and that the grated cheese is then packaged immediately, without any treatment and without the addition of any substance capable of altering its shelf life or its original organoleptic characteristics.*

has been amended to read:

As already established by the Prime Ministerial Decree of 4 November 1991, the designation of origin 'Parmigiano Reggiano' can also be used for grated cheese obtained exclusively from a whole cheese eligible for that designation of origin, provided that grating takes place within the cheesemaking area and that the grated cheese is then packaged immediately, without any treatment and without the addition of any substance.

This amendment has been included in point 3.5 of the single document.

In the text referring to the packaging of grated 'Parmigiano Reggiano', the phrase 'without the addition of any substance capable of altering its shelf life or its original organoleptic characteristics' has been changed to 'without the addition of any substance'. The aim of this rewording is to make it unequivocally clear that the ban on adding substances applies to all substances.

A new paragraph has been added, reading as follows: *However, the use of 'trimmings' is also permitted under the conditions set out above.*

This amendment has been included in point 3.5 of the single document.

The possibility of using 'trimmings', as well as whole cheeses, for grated 'Parmigiano Reggiano' is now expressly stated.

Over the years, the market has been evolving in line with varying consumer requirements, meaning that there are now many more formats and types of portioned 'Parmigiano Reggiano' available on the market. In particular, whereas 1 kg used to be almost the only portion size available, consumers' changing habits mean that there is now demand for increasingly smaller formats (fixed weight of 150/200 g, rind-free miniature 'snack' portions, etc.). Obtaining these formats from 'Parmigiano Reggiano' cheeses results in a lot more offcuts (for example, the flat faces of the wheels of cheese, the core portion from the centre of the wheel, or portions that are over or under the fixed weight) that were not created in preparing large formats.

These offcuts, known as 'trimmings', are not packaged as portions but instead re-used by operators within the control system to prepare other formats, in particular grated 'Parmigiano Reggiano' as per Article 8. The purpose of this amendment was therefore to make it clear that grated cheese can be obtained from 'trimmings' as well as from whole cheeses.

In the fifth paragraph, amendments have been made to the characteristics of grated 'Parmigiano Reggiano' cheese:

- The following sentence: *rind content not more than 18 %*;

has been amended to read:

rind content not more than 18 % by weight;

- The following sentence: *homogenous, non-powdery appearance, with the proportion of particles measuring less than 0.5 mm in diameter not exceeding 25 %*.

has been amended to read:

homogenous, non-powdery appearance, with the proportion of particles measuring less than 0,5 mm in diameter not exceeding 35 %.

The first of these amendments has been included in point 3.5 of the single document.

The intention behind adding the expression 'by weight' is to define how this percentage is to be calculated.

Rather than a product quality parameter, this limit on the quantity of 'fine' particles in grated cheese was originally introduced, years ago, because of the risk of operators preparing grated 'Parmigiano Reggiano' PDO partially or entirely made up of dried cheese (by its nature fine and powdery). A limit was therefore established for particles measuring less than 0,5 mm in diameter.

Particle size is influenced by a number of factors (moisture, maturing, type of grater, grating pressure) and is therefore highly variable.

The market and production technology have evolved over recent years. There is increasing demand from operators for finer, more homogenous grated cheese, especially when it is to be mixed with other ingredients. On top of this, more mature cheese (30 months plus) and small formats (bite-size cubes and small portions) have become increasingly popular. Preparing these small formats produces a lot of offcut cheese (including small-sized offcuts), which is more susceptible to drying out, and when the cheese being grated is very mature, this makes it even more resistant, meaning that applying the same amount of pressure to the cheese gives a smaller grated particle size. This is why the percentage of particles measuring less than 0,5 mm in diameter is being changed from a minimum of 25 % to a minimum of 35 %, which is a more accurate reflection of the grated 'Parmigiano Reggiano' currently being produced, without compromising its quality characteristics.

- Article 7

A new paragraph has been added, reading as follows: *Offcuts of 'Parmigiano Reggiano' which are to be used by operators within the control system to prepare other formats are referred to as 'trimmings'*.

This last amendment has been included in point 3.5 of the single document.

As already stated for Article 5, and for the same reasons, the concept of 'trimmings' has been explained.

'Method of production' heading

Cheesemaking Standard

- Article 3

The following rule has been removed from the third paragraph: *The milk cannot be subjected to centrifugation processes*. This is because it has been moved to Article 1 and reworded to read: *The milk must not undergo any heat treatment or physical or mechanical treatments such as centrifugation [...]*. The reasons for this amendment are those given for the amendment to Article 1 under the *Description of product heading*.

The fifth paragraph: *The evening milk is partially skimmed [using the Italian term scremato] by letting the cream rise naturally to the surface in open-topped steel tanks. On delivery to the cheese dairy, the morning milk is mixed with the partially skimmed [scremato] milk from the previous evening. It may also be partially skimmed [scrematuro] by letting the cream rise naturally to the surface*.

has been amended to read:

*The evening milk is partially skimmed [using the Italian term *decremato*] by letting the cream rise naturally to the surface in open, naturally ventilated steel tanks. On delivery to the cheese dairy, the morning milk is mixed with the partially skimmed [*decremato*] milk from the previous evening. It may also be partially skimmed [*decrematura*] by letting the cream rise naturally to the surface.*

In point 3.4 of the single document the word 'previous' has been inserted in front of 'evening' in the interests of clarity.

Traditionally, the tanks were open vats in which the milk was left to settle so that the cream would rise to the surface. New technologies have been developed over the years, both to reduce space and to make plants cleaner and more efficient, and those tanks have been replaced by multi-level installations with lids that can be opened, so the description of the steel tanks as 'open-topped' has been changed to 'open, naturally ventilated'.

The Italian terms for skimmed milk and the skimming process, *scremato* and *scrematura*, have been changed to *decremato* and *decrematura* in line with the amendment to Article 1 under the *Description of product heading*.

This last amendment has been included in point 3.4 of the single document.

The sixth paragraph: *The fat-to-casein ratio of the milk in the heating vats, calculated as the weighted average of all vat batches in a given day's production, cannot exceed 1,1 + 12 %.*

has been amended to read:

The fat-to-casein ratio of the milk in the heating vats, calculated as the weighted average of all vat batches in a given day's production, cannot exceed 1,10 + 10 %.

This last amendment has been included in point 3.4 of the single document.

The fat-to-casein ratio has been revised, reducing the tolerance from 12 % to 10 %, and '1,1' has been changed to '1,10' for clarity.

Based on various statistics and scientific studies, the average reference value for the fat-to-casein ratio in 'Parmigiano Reggiano' was found to be around 1,1, and since the artisan cheesemaking techniques used to make this cheese and differences in the fat content of the milk used, influenced both by season and by farming technique, can cause some fluctuation in this ratio, a tolerance was established, initially estimated at around 10 %.

An additional 2 % (from 10 to 12 %) was added to account for measurement and sampling uncertainty, as well as the fluctuations referred to above, which is why a ratio of 1,1 + 12 % was proposed when a minor amendment to the product specification was approved (OJ C 132, 13.4.2018, p. 7).

After that approval, when drawing up the control plan, the authorised control body (OCQPR Soc. Coop.) sent the Ministry of Agricultural, Food and Forestry Policy a request for clarification regarding the fat-to-casein ratio required for 'Parmigiano Reggiano' on 23 May 2018, asking whether the requirement that 'the fat-to-casein ratio of the milk in the heating vats [...] cannot exceed 1,1 + 12 %', as stated in the text, included measurement uncertainty.

The reply from the Ministry of Agricultural, Food and Forestry Policy was that this value of 1,1 + 12 % does not in itself cover measurement uncertainty, so the tolerance needs to be reduced by 2 percentage points in order to align the rule in the product specification with the principle underlying the original decision.

The seventh paragraph: *Up to 15 % of the morning milk can be set aside for the next day's cheesemaking. In this case, the milk, which must be kept at the dairy in suitable steel containers at a temperature not lower than 10 °C, must be left to stand in the skimming tanks, together with the evening milk, to allow the cream to rise to the surface.*

has been amended to read:

Up to 15 % of the morning milk can be set aside for the next day's cheesemaking. More than 15 % can be set aside as long as this quantity allows no more than one wheel of cheese to be made. This milk, which must be kept at the dairy in steel containers at a temperature not lower than 10 °C, must be left to stand in the skimming tanks, together with the evening milk, to allow the cream to rise to the surface.

The text now allows more than 15 % of the morning milk to be set aside for the next day's cheesemaking, provided that a larger percentage is needed to make at most one wheel of cheese. This addition to the text should allow small cheese dairies to have enough milk in the heating vat at certain times of year to make a whole cheese.

The eighth paragraph: *A continuous whey starter, a natural culture of lactic ferments obtained by leaving whey left over from the previous day's cheesemaking to spontaneously turn sour, is added to the milk.*

has been amended to read:

A continuous whey starter, a natural culture of lactic acid bacteria obtained by leaving 'sweet' whey left over from previous cheesemaking operations to spontaneously ferment in controlled temperature conditions, is added to the milk.

This amendment has been included in point 3.4 of the single document.

The following has been added in that same paragraph: *Neither lactic acid bacteria cultures for adjustment or strengthening nor nutritional supplements promoting the development of lactic flora may be added to the continuous whey starter. Only the addition of a single portion of milk is permitted.*

In the description of the characteristics of the continuous whey starter, 'lactic ferments' has been changed to the more technically correct 'lactic acid bacteria'. The ban on certain practices – the addition of lactic acid bacteria cultures or nutritional supplements that encourage the development of natural lactic acid bacteria – has also been made explicit. This change aims to make it clear that the continuous whey starter is a natural ingredient and highlight the role it plays in 'Parmigiano Reggiano' cheesemaking: the strong link between territory and product. This is why the continuous whey starter may only be obtained from the fermentation of the sweet whey left over from previous cheesemaking operations. The word 'day' has been removed with a view to giving cheesemakers the possibility of also adding, in consideration of the chemical, physical and microbiological characteristics of the milk, small quantities of continuous whey starter – the same starter that will be added to the milk in the heating vat the next day – to the evening milk left in tanks to allow the cream to rise to the surface. The purpose of this practice is to contribute lactic flora and slightly sour the milk overnight, making it more suitable for cheesemaking the next morning.

Finally, it has been made explicitly clear that it is possible to add a single portion of the dairy's milk, an authentic and unvarying local practice that was already an established tradition. This practice makes it possible to provide the lactic acid bacteria in the whey starter with growth-promoting nutrients.

The following sentence has been added at the end of the thirteenth paragraph: *The cheeses may be matured on wooden-shelved racks.*

This amendment has been partially included in point 3.4 of the single document.

In the interests of transparency, the possibility of maturing cheeses on wooden-shelved racks has been made clear, since the use of wood in 'Parmigiano Reggiano' cellars is a well-established and well-founded tradition which cannot be changed. As potential health or hygiene issues relating to the use of wood have been raised on some foreign markets (the United States in particular) in recent years, it is considered important to make it clear in the product specification that wood is an essential material and that – precisely as a result of forming part of an established tradition – it has never caused any health problems.

'Labelling' heading

Cheesemaking Standard

— Article 8

The following paragraph has been added:

Except when used as 'trimmings', offcuts from the faces and sides of wheels of cheese (pieces with more than 18 % rind) cannot bear the name 'Parmigiano Reggiano'.

This amendment has been included in point 3.6 of the single document.

The quality characteristics of 'Parmigiano Reggiano' are well defined in the product specification, and they include specific references to the cheese paste:

- *characteristic aroma and taste of the paste: fragrant, delicate and flavoursome without being strong;*
- *texture of the paste: fine-grained and flaky.*

Moreover, the product specification has capped the amount of rind present in grated cheese at 18 % since 1991 (Prime Ministerial Decree of 4 November 1991). Only grated cheese was concerned by the addition of this requirement, since the rind component is always less than 18 % on the formats with rind (whole cheeses and portions with rind). As described earlier in relation to 'trimmings', offcuts from the faces and sides of wheels of cheese (pieces with more than 18 % rind) are left over from the preparation of sales formats. If these offcuts are not to be used in the preparation of grated 'Parmigiano Reggiano', in which case the addition of cheese paste corrects the paste-rind balance, they can be sold. However, such offcuts comprise a large amount of rind and thus do not contain enough actual cheese paste to comply with the definition of the typical characteristics of 'Parmigiano Reggiano'. Accordingly, as they are no longer compliant with the product specification, they can no longer be sold as 'Parmigiano Reggiano'.

For the above reasons, as well as to provide consumers with accurate information and ensure fair competition between operators, unless used as 'trimmings', offcuts from the faces and sides of wheels of cheese (pieces with more than 18 % rind) cannot use the name 'Parmigiano Reggiano' PDO.

— Article 9

The following from the first paragraph: [...] *the logo shown below, depicting a wedge and a wheel of 'Parmigiano Reggiano' cheese and a small knife above the words 'PARMIGIANO REGGIANO', must be displayed on every pack. This logo must be printed in CMYK following the technical specifications laid down by the pertinent Consortium agreement.*



has been amended to read:

[...] *the logo shown below, containing a stylised depiction of a wedge and a wheel of 'Parmigiano Reggiano' cheese above the words 'PARMIGIANO REGGIANO', must be displayed on every pack. This logo must be printed in colour following the technical specifications laid down by the pertinent Consortium agreement.*



This amendment has been partially included in point 3.6 of the single document.

The logo has been changed to make it stylistically more modern and current. It, too, has been included under point 3.6 of the single document.

The second paragraph: *To allow consumers to find out how mature 'Parmigiano Reggiano' is, the minimum maturing time must be stated on the labelling of all pre-packaged portions of more than 15 g placed on the market.*

has been amended to read:

To make it possible to find out how mature 'Parmigiano Reggiano' is, the minimum maturing time must be stated on the label of all pre-packaged portions of more than 15 g placed on the market.

This amendment has been included in point 3.6 of the single document.

The reference to 'consumers' has been deleted, since the obligation to state the minimum maturity of the cheese has to apply to all pre-packaged cheese in portions of more than 15 g, including when it is to be sold to commercial operators (processing companies, mass catering businesses such as restaurants, etc.) and not just to end consumers. This amendment aims to make that clearer. On the basis of the definitions established in Article 2(2)(i) and (j) of Regulation (EU) No 1169/2011, 'labelling' has been changed to 'label' because the minimum maturity time must be stated on the packaging or container, and may not be stated in the documents.

The following has been added as a third paragraph:

As the aroma and taste of the paste of 'Parmigiano Reggiano' evolve over the course of the maturing process, in order to convey the organoleptic characteristics, the following descriptive adjectives may be used on the label, as well as the maturing time, for certain maturity classes:

- *delicato [delicate] (12-19 months);*
- *armonico [harmonious] (20-26 months approx.);*
- *aromatico [aromatic] (27-34 months approx.);*
- *intenso [intense] (35-45 months approx.).*

This amendment has been included in point 3.6 of the single document.

Introducing the requirement to state the minimum maturity of 'Parmigiano Reggiano' placed on the market in portions of more than 15 g gave rise to a need to express an organoleptic assessment using 'descriptive' adjectives that vary according to maturity. Because 'Parmigiano Reggiano' is matured for a long time, from 12 to more than 40 months, its aromas and flavours evolve, which is why the possibility of using 'descriptive' adjectives on labels has been added, to help consumers in their choice of product.

The fourth paragraph: *Stating the dairy's registration number or name on the labelling is only compulsory for grated cheese or portions originating from cheeses marked as 'Premium' pursuant to Article 15 of the 'Rules on Identity Markings'.*

has been amended to read:

Stating the dairy's registration number or name on the label is only compulsory for grated cheese or portions originating from cheeses marked as 'Premium' pursuant to Article 15 of the 'Rules on Identity Markings'.

On the basis of the definitions established in Article 2(2)(i) and (j) of Regulation (EU) No 1169/2011, 'labelling' has been changed to 'label' because the dairy's registration number or name must be stated on the packaging or container, and may not be stated in the documents.

Rules on Identity Markings

— Article 1: 'The markings'

The second paragraph: *2. Each dairy must mark its cheeses with origin information by:*

- (a) *attaching a casein disc to each wheel of cheese with the codes identifying it;*
- (b) *printing the words 'Parmigiano-Reggiano' in pin-dot lettering (see Image 1), the dairy's registration number and the year and month of production around the sides of the wheel using stencilling bands.*

has been amended to read:

2. Each dairy must mark its cheeses with origin information by:

- (a) *attaching a casein disc to each wheel of cheese or using an equivalent system that ensures the unique identification of each cheese (hereinafter 'disc' or 'discs');*
- (b) *printing the words 'Parmigiano-Reggiano' in pin-dot lettering (see Image 1 and Image 1-bis), the dairy's registration number, the year and month of production and the acronym 'DOP' [PDO] around the sides of the wheel using stencilling bands.*

These amendments have been included in point 3.6 of the single document.

Since technological developments might bring other ways of uniquely identifying 'Parmigiano Reggiano' cheeses in the future, the text now states the possibility of using other systems than casein discs.

A reference has been added to 'Image 1-bis', which has been added to the 'Sample Images' section.

The text now states that the stencilling bands used to imprint origin markings into the cheeses must also include the acronym DOP (PDO), as this acronym is already on the stencils being used today.

The third paragraph: *3. Selection markings are made by the 'Parmigiano Reggiano' Cheese Consortium in accordance with Art. 4, 5, 6, 7 and 8 below, once the checks have been performed by the authorised control body.*

has been amended to read:

3. *Selection markings are made by the 'Parmigiano Reggiano' Cheese Consortium, as established in Articles 4, 5, 6, 7 and 8 below, once the checks have been performed by the authorised control body.*

The word 'Articles' spelt out in full has replaced the abbreviation 'Art.'

— Article 3: 'Dairies' obligations'

The first paragraph: *1. At least 4 months before commencing activity, dairies intending to make 'Parmigiano Reggiano' cheese must apply to the Consortium, declaring that they have been included in the control system, in order to be allocated a registration number and request stencilling bands and casein discs for origin markings.*

has been amended to read:

1. *Before commencing activity, dairies intending to make 'Parmigiano Reggiano' cheese must apply to the Consortium, declaring that they have been included in the control system, in order to be allocated a registration number and request stencilling bands and discs for origin markings.*

The reference to '4 months' has been removed as this was considered too long a timeframe. The word 'casein' has been deleted in line with the amendment to Article 1.

The second paragraph: *2. The dairies are responsible for the proper use and preservation of stencilling bands and casein discs, which are supplied to them on the basis of trust.*

has been amended to read:

2. *The dairies are responsible for the preservation and proper use of stencilling bands and discs, which are supplied to them on the basis of trust.*

This amendment consists of rewording the sentence about preservation and proper use of stencilling bands and discs into a more logical order.

The fifth paragraph: *5. [...] In the event of non-compliance, the Consortium shall order the withdrawal of stencilling bands and discs and/or the imposition of a penalty, following the procedures established in the control plan.*

has been amended to read:

6. *[...] In the event of non-compliance, the Consortium shall order the withdrawal of stencilling bands and discs and/or the imposition of a penalty, in compliance with current legislation.*

It is clarified that any withdrawal of stencilling bands or discs and/or imposition of penalties by the Consortium must be in compliance with current legislation.

— Article 6: 'Cheese classification'

The second paragraph: *2. To make the quality inspection process as objective as possible, the inspection panels must cut into at least one wheel of cheese per batch, and never fewer than one cheese per thousand or part thereof, in order to assess the textural and organoleptic characteristics. [...]*

has been amended to read:

2. *To help the inspectors in their assessment of the cheeses, the inspection panels must cut into at least one wheel of cheese per batch, and in any case as many cheeses as are necessary in order to assess the textural and organoleptic characteristics. [...]*

The inspectors' activity in assessing 'Parmigiano Reggiano' cheese is now described more correctly by specifying that the purpose of cutting into the cheeses is to help them in the quality assessment process. Moreover, instead of referring to the minimum number of cheeses that inspection panels must cut into, the text now requires them to cut into as many cheeses as are necessary for the best assessment of the textural and organoleptic characteristics of the cheese paste, thus improving their assessment.

— Article 7: 'Ink-stamping'

The first paragraph: *During the quality inspections referred to in Article 6, the cheeses shall be stamped in indelible ink with a provisional marking assigning one of the following categories as defined in the Annex:*

has been amended to read:

During the quality inspections referred to in Article 6, the cheeses shall be stamped in indelible ink, or using an equivalent system, with a provisional marking assigning one of the following categories as defined in the Annex:

Following the quality inspection and classification, it is current practice for the inspectors to mark the cheeses with an ink stamp provisionally marking them with the quality category they have been assigned – one, two or three – until the cheeses undergo the subsequent marking process, that can take place with effect from 7 days after the inspection, as instructed by the control body. As technology is evolving, this amendment aims to make it possible to use different mechanisms for this temporary identification of cheeses.

— Article 9: 'Cancellation of markings'

The following paragraph: *The markings shall be removed from category three cheeses [...] by Consortium staff [...].*

has been amended to read:

The origin markings shall be removed from around the sides of category three cheeses [...] by Consortium staff [...].

The origin markings on cheeses are: the words 'Parmigiano Reggiano' in pin-dot lettering (as well as the registration number of the dairy that made it, the year and month of production, and the abbreviation DOP [PDO]), printed around the sides of the wheel of cheese using a stencilling band; and the casein disc for traceability purposes, which is usually attached to the flat face of the wheel. When a cheese does not meet the requirements to use the PDO, the origin markings around the sides, including the words 'Parmigiano-Reggiano' in pin-dot lettering, are removed so that the cheese is no longer presented to consumers as 'Parmigiano Reggiano', whereas the casein disc, which is usually found on one of the flat faces of the wheel of cheese and needs to remain place to ensure traceability, is left attached. The purpose of the amendment is to make it clearer that the cancellation of origin markings concerns only those around the side of the wheel of cheese.

— Article 11: 'Appeals'

The first paragraph: *1. Dairies may appeal against the verdict of a quality inspection by contacting the Consortium in writing by recorded delivery up to 4 days after the end of each individual quality inspection session.*

has been amended to read:

1. *Dairies may appeal against the verdict of a quality inspection by contacting the Consortium in writing up to two (2) days after the end of each individual quality inspection session.*

The window of time in which the verdict of a quality inspection can be appealed against has been reduced from 4 days to 2 days. In order to simplify the administrative process, the text now states that appeals must be submitted in writing, and not necessarily sent by recorded delivery.

— Article 12: 'Requesting the correction of origin markings'

This article, which currently reads: *If work has to be performed on the part of the rind where the disc is located to correct defects that have developed during maturing, the dairy shall ask the Consortium to replace the disc with an indelible stamp. Dairies must keep removed discs and hand them over to the Consortium.*

has been amended to read:

1. *If a disc no longer adheres properly to the cheese following maturing, or work has to be performed on the part of the rind where the disc is located to correct defects that have developed during maturing, the dairy shall promptly ask the Consortium to replace the disc with an indelible stamp. Dairies must keep removed discs and hand them over to the Consortium.*

The text now also requires dairies to ask the Consortium to replace discs with indelible stamps when the disc no longer adheres properly to the cheese, and specifies that this request must be made promptly.

— Article 13: 'Requesting the cancellation of origin markings'

This article, which currently reads: *If defects develop during maturing that are so serious that the maturing process cannot continue, dairies are entitled to request, prior to the quality inspection, that the Consortium cancel the origin markings of the affected cheese or that the cheese be handed over in accordance with Article 9.*

has been amended to read:

If defects develop during maturing that are so serious that the minimum maturing process cannot continue, dairies are entitled to request, prior to the quality inspection, that the Consortium cancel the origin markings around the sides of the affected cheese or that the cheese be handed over in accordance with Article 9.

'Minimum' has been added to make it clear that dairies may request the cancellation of markings during the minimum 12-month maturation period. Moreover, in line with the amendment to Article 9 and the provisions of that article, it is specified that the cancellation of origin markings concerns only those found around the sides of the wheel of cheese.

— Article 16: 'Costs'

The third paragraph: *Dairies shall be required to cover the cost of replacing stencilling bands that have worn out ahead of time or are otherwise damaged.*

has been amended to read:

Dairies may be required to cover the cost of replacing stencilling bands that have worn out ahead of time or are otherwise damaged.

'Shall' has been changed to 'may' because requesting payment of these costs is an option, not an obligation.

Annex

'Product Categories'

In point 3, concerning 'Parmigiano Reggiano' mezzano [medium], the following phrase: *well-executed corrections made to the sides or flat faces of the wheel that are minimal enough to avoid significantly impairing the cheese's external appearance, without any olfactory defects.*

has been amended to read:

corrections made to the sides or flat faces of the wheel that are minimal enough to avoid significantly impairing the cheese's external appearance, without any olfactory defects.

In application of the customs and practices relevant to the definition of the commercial categories of 'Parmigiano Reggiano' cheese, as referred to in Article 6 of the *Rules on Identity Markings* and more specifically in point (b) (*Market choice categories 0-1*) of the *Cheese classification* heading within section four (*Parmigiano-Reggiano Cheese*) of the 1990 *Provincial Compendium of Customs of the Reggio Emilia Chamber of Commerce, Craft Trades and Agriculture*, 'category 0' cheese may have 'certain minor well-executed corrections or minor issues awaiting correction that do not result in the cheese wheel becoming deformed'. This concept of 'correction' encompasses both aesthetic defects still present on the rind of a cheese, varying in terms of size, depth and possibly moisture content ('issue awaiting correction'), and the result of correcting an aesthetic defect, usually through cauterisation, to resolve or diminish the problem or remove moisture ('executed correction').

In the *Product Categories* annex to the *Rules on Identity Markings*, point 2 (*'Parmigiano Reggiano'* category 0 and category 1), item (a) (category 0) does not distinguish between 'executed corrections' or 'issues awaiting correction', but refers only to the fact that any correction must be small in size and not cause the cheese to be deformed.

Nowadays it is common practice for dairies to submit 'issues awaiting correction' to the quality inspection panel, in which case the cheeses are assigned the product category appropriate to the extent of the defect.

As the inclusion of the word 'well-executed' meant that this passage covered only 'executed corrections', this word has been removed, leaving it possible for category two cheeses to be submitted for inspection with both 'executed corrections' and 'issues awaiting correction'.

SAMPLE IMAGES

An image of the words 'Parmigiano-Reggiano' in pin-dot lettering around the side of a wheel of 'Parmigiano Reggiano' has been included for illustrative purposes.

'Other' heading

'Packaging' sub-heading

Cheesemaking Standard

— Article 6

This paragraph: *Portions of 'Parmigiano Reggiano' may be packaged for immediate sale in person at the same business that cut the portion.*

has been amended to read:

Grating, portioning, and pre-packaging for direct sale may be carried out at the retail outlet solely for the purpose of sale to the end consumer.

This amendment has been included in point 3.5 of the single document.

The current version of the product specification provides for the possibility of portioning and packaging 'Parmigiano Reggiano' for immediate sale in person at the retail outlet at which portioning takes place. That possibility was included on the basis of the principles expressed by the Court of Justice of the European Union (paragraph 62 of the judgment of 20 May 2003 in Case C-469/00). This also makes it possible for businesses to provide a service to end consumers, as cutting portions from wheels or parts of wheels of cheese is a time-consuming process and it would be very difficult for points of sale – particularly when busy – if portions could only be cut on request from the consumer.

As the Court of Justice judgment also cites the grating process, this amendment includes the express possibility of grating and packaging also taking place at the retail outlet for direct sale to the end consumer, for the same reasons given above. This clarification is also necessary because of the frequent objections raised in recent years with the bodies responsible for checks in relation to the possibility of grating and packaging 'Parmigiano Reggiano' cheese at retail outlets for direct sale.

'Cow Feeding Rules' heading

Cow Feeding Rules

— Article 1: 'Scope'

A second, a third and a fourth paragraph have been added to Article 1.

The second paragraph reads:

The milk must be produced on farms located in the area of origin and included in the control system.

This sentence has been inserted into point 3.3 of the single document, and the following have been deleted: the sentence from point 3.3 that read *The milk is from cows reared in the defined geographical area*; the sentence from point 3.4 that read *The farms that rear the dairy cows whose milk is to be processed into 'Parmigiano Reggiano' must be located within the defined geographical area*; and the reference to the milk being 'produced' from point 3.4 of the single document.

It has been made clear that the cow's milk used as raw material must be produced in the defined geographical area on farms that are subject to official controls to verify compliance with the product specification.

The third paragraph reads:

The rearing of replacement dairy cows ('restocking') must be carried out in the area of origin and included in the control system as a specific activity of a dairy farm. The rules laid down in Article 9 apply to livestock originating from other production sectors.

This amendment has been included in point 3.3 of the single document.

The text now includes an explicit reference to the rearing of replacement dairy cows ('restocking'), i.e. the rearing of female calves and heifers that will join the dairy herd in the future, together with the necessary reference that this is a specific activity of a dairy farm. Given this structural and functional link with dairy farming, the text now requires restocking to take place in the defined geographical area and be subject to official controls to verify compliance with the product specification.

Finally, a reference is made to Article 9 of the *Cow Feeding Rules*, which governs the entry of livestock from production chains other than the 'Parmigiano Reggiano' chain onto dairy farms or restocking units.

The fourth paragraph reads:

Dairy farms that had restocking activities located outside the area of origin as at 5 January 2021 may continue to conduct this activity outside the area of origin provided that it is included in the control system.

This amendment has been included in point 3.3 of the single document.

The amendment gives consideration to the representations made by certain businesses engaged in rearing livestock and producing milk to be made into 'Parmigiano Reggiano' cheese, which – as permitted by the current version of the product specification – have long been managing their own production cycles by using a restocking unit located outside the defined geographical area. The only purpose of this activity is to rear female calves and young heifers which, once mature, will replace dairy cows on dairy farms owned by the same businesses within the defined geographical area. This amendment therefore makes it possible to ensure the continuity of a business model organised in this way, albeit counterbalanced by making those businesses' restocking activities located outside the defined geographical area subject to the basic requirements laid down in Articles 5 and 9 of the *Cow Feeding Rules* and official controls to verify compliance with the product specification, provided that those activities were already in place when the application for an amendment was published in the Official Gazette of the Italian Republic.

— Article 4: 'Permitted fodder'

The second point of the first paragraph: *Dairy cows may be fed:*

— [...]

— *forage ryegrass, forage rye, forage oats, forage barley, forage wheat, forage maize [...];*

has been amended to read:

Dairy cows may be fed:

— [...]

— *forage ryegrass, forage rye, forage oats, forage barley, forage wheat, forage triticale, forage maize [...];*

Forage triticale, which has similar characteristics to other forage crops already permitted (barley, wheat, rye, etc.), has been included in the list of permitted fodder. As the use of forage triticale, either fresh or dried, may be of particular interest in the hillier parts of the defined geographical area, where it is particularly prevalent, the text now expressly includes the possibility of its use in order to maximise the possibility of using fodder from the local area.

— Article 5: 'Banned forages and by-products'

The first two paragraphs:

In order to prevent the environment of the cattle housing in which female calves, heifers up to the sixth month of gestation and dairy cows are reared from being contaminated with silage – including preventing contamination through soil and fodder – the use and possession of silage of any kind are prohibited.

Farms on which dairy cows are reared must ensure that entirely separate areas are used for any farming activities from other production chains (beef cattle, digesters, etc.). Cereal silage and by-products may be kept and used for those other farming activities.

have been amended to read:

In order to prevent the environment of the cattle housing from being contaminated with silage – including preventing contamination through soil and forage – and to permit the animals' rumens to adapt physiologically to a silage-free diet, dairy farms and restocking units are prohibited from using and possessing silage of any kind.

Farms on which dairy cows are reared and restocking units must ensure that entirely separate areas are used for any farming activities from other production chains (beef cattle, digesters, etc.). Cereal silage and by-products may be kept and used for those other farming activities.

The amendment to the first paragraph has been included in point 3.3 of the single document.

The purpose of this amendment is firstly to adapt the Article to reflect the amendments to Article 1 of the *Cow Feeding Rules*, including harmonising the terminology used, by establishing that, as was already the case for dairy farms, restocking units are also banned from using and possessing any kind of silage. Secondly, the amendment expressly includes a second fundamental reason for banning the possession and use of silage, in addition to preventing contamination of the housing environment: the need to allow the physiological adaptation of the animals' rumens to a silage-free diet (from a young age). For this second aspect, please refer to the reasons given for the amendments to Article 9 of the *Cow Feeding Rules*.

Similarly, the amendment to the second paragraph is also aimed at bringing the article into line with the amendments made to Article 1 of the *Cow Feeding Rules*.

The reference to *molasses in liquid form (except where use is permitted under Article 6)*, previously the sixth bullet item under point (b) of the fourth paragraph, has been deleted.

The absolute ban the use of molasses, originally brought in because of the frequent poor quality and highly variable characteristics of this product, has been removed (albeit with usage still regulated by Article 6) because this product is now entirely reliable thanks to modern production technology, the use of which is required by law. The use of molasses is even advisable in certain rations, such as hay-based rations, which have less sugar than fresh grass because the mild fermentation that turns grass into hay causes the loss of some sugar content.

Cattle housing is managed very differently nowadays, meaning that the risk of troughs and farm equipment becoming soiled – originally one of the main reasons advising extreme caution in the use of molasses inside housing – is now easily manageable.

— Article 6: 'Raw materials in non-forage feedstuffs'

The following paragraphs: *The following may also be used in complementary compound feed:*

— *carob up to a maximum quantity of 3 %;*

— *molasses up to a maximum quantity of 3 %.*

The administration of feedstuffs in the form of molasses blocks, including in crushed form, is permitted up to a maximum of 1 kg per head per day. The use of molasses blocks is not, however, compatible with the use of feedstuffs that contain molasses.

Sugar-based products and/or propylene glycol- and glycerol-based products are also permitted, either in liquid form or mixed into feed, up to a maximum of 300 g per head per day.

have been amended to read:

Carob, beet and cane molasses, malt extract, propylene glycol and glycerol may also be used in complementary compound feed up to a maximum overall quantity of 6 %.

The use of sugar-based products, including those in liquid or molasses-based form (cane or beet molasses), malt extract, propylene glycol and glycerol, in the diets of milking cows, whether administered to individual cows or added to the total mixed ration, is limited to 800 g per head per day. These products may not be administered via drinking water.

The article simply merges the limits on carob and molasses (and other similar sugar products), previously divided into 3 % molasses + 3 % carob, into a single overall limit of 6 %.

The use of sugar products, including molasses which were previously banned by Article 5, has been extended from only molasses blocks to a broader group of similar products and regulated by the setting a maximum daily limit that is considered appropriate for supplementing the high-fibre rations typical of the 'Parmigiano Reggiano' production chain.

The use of these products is particularly suitable today compared to when the previous version of the product specification was drafted, because the total mixed ration has now entered widespread use, and they can perform a useful function: they bind the ration and make it less powdery, resulting in a more homogenous mixture and a more hygienic housing environment.

The fifth paragraph: *Without prejudice to Article 8, other products and feedstuffs permitted by current legislation for use in dairy cows may also be used subject to testing by the 'Parmigiano Reggiano' Cheese Consortium, which shall notify the competent bodies once it has verified the compatibility of such products and feedstuffs.*

is now the fourth paragraph and has been amended to read:

Without prejudice to Article 8, other products and feedstuffs permitted by current legislation for use in dairy cows may also be used subject to assessment by the 'Parmigiano Reggiano' Cheese Consortium, which shall notify the competent bodies once it has verified the compatibility of such products and feedstuffs with the principles laid down in Article 2.

In relation to the ban on the use of certain raw materials in non-forage feedstuffs and products for feeding dairy cows, the term 'testing' has been changed to 'assessment'. It is now specified that compatibility must be checked against the 'General principles governing feed' laid down in Article 2 of the *Cow Feeding Rules*.

— Article 7: 'Use of simple and compound complementary feed, fortified and non-fortified'

The fourth paragraph has been deleted. It read: *The total quantity of crude fat from products and by-products of soya, flax, sunflower, maize germ and wheat germ must not exceed 300 g per head per day.*

Without changing the rationale underlying this specific requirement or the overall approach of the product specification to the use of fats – which must be strictly regulated – the above method of quantifying the fat contribution of certain ingredients used to make non-forage feedstuffs has been replaced by the method described in the last paragraph in order to make checks more feasible, since it is extremely difficult to distinguish between the fats provided by 'products and by-products of soya, flax, sunflower, maize germ and wheat germ' alone, and much easier to check the overall fat quantity administered, both in terms of paperwork (based on feed information sheets or the ingredients placed in the TMR mixer) and from an analytical perspective.

The following, previously the second paragraph of Article 8, has been moved here to become the fourth paragraph: *Dairy cows cannot be fed any soap or fat of animal or vegetable origin (oil, tallow, lard, butter), either directly or as an ingredient in feed.*

The third paragraph of Article 8: *Lipids of vegetable origin may be used to carry and protect micronutrients, up to a maximum quantity of 100 g per head per day.*

is now the fifth paragraph of Article 7 and has been amended as follows:

Vegetable oils and fats of any type or form may be used only as premix carriers and for the protection of amino acids, vitamins, minerals and other nutrients up to a maximum quantity of 50 g per head per day.

The changes to the text that used to be in Article 8 consist of changing 'lipids of vegetable origin' and 'micronutrients' to 'vegetable oils and fats' and 'amino acids, vitamins, minerals and other nutrients' respectively, as they are more exhaustive terms.

The limit of vegetable oils and fats added 'as is' in any type or form is reduced from 100 g to 50 g per head per day because these substances must have the sole function of protecting amino acids, vitamins, minerals and other nutrients, rather than being used as a covert way of adding fats that are otherwise banned, a practice that is rendered pointless by reducing the overall quantity, while maintaining their use as a carrier for amino acids such as methionine or vitamins such as choline.

The following has been added as a sixth paragraph: *In order to avoid negative interference with ruminal fermentation and deterioration of milk quality, the daily amount of lipids (assessed as ether extract) administered to milking cows:*

- *must not exceed 4,0 % of total dry matter;*
- *must not exceed 700 g in terms of quantity administered through non-forage feedstuffs as defined in Article 2 of these Rules.*

The maximum daily limit of lipids that can be administered to milking cows through the permitted products has been set at 4 % of total dry matter in the ration. This overall limit is met through the limit on fat administered through non-forage feedstuffs. Instead of a limit of 300 g on fat that could be administered through oilseeds (soya, flax, sunflower, maize germ and wheat germ), which was very difficult to verify, this has been replaced with a limit of 700 g of fats that can be administered in non-forage feedstuffs via the fats naturally present in all of the feed materials (therefore also including maize, for example).

— Article 8: 'Banned feed materials and banned products'

The following from the first bullet point of the first paragraph: *all food of animal origin: fishmeal, meat, blood, plasma, feathers, miscellaneous slaughter by-products and dried milk and egg processing by-products;*

has been amended to read:

all food of animal origin: fishmeal, meat, blood, plasma, feathers, miscellaneous slaughter by-products as well as dried milk and egg processing by-products;

The text has been reworded by replacing the conjunction *and* with *as well as*.

In the eighth bullet point of the first paragraph, *farmed algae* has been changed to just *algae*, as its origin cannot be verified and because the products currently on the market and therefore subject to the rules in force guarantee sufficient levels of overall safety.

The following from the second bullet point of the fourth paragraph: *the antioxidants butylated hydroxyanisole, butylated hydroxytoluene and ethoxyquin.*

is now the second bullet point of the second paragraph and has been amended to read:

the antioxidants butylated hydroxyanisole, butylated hydroxytoluene and ethoxyquin, unless administered with vitamins for technological purposes as stabilising agents.

The expression 'unless administered with vitamins for technological purposes as stabilising agents' has been added because the listed antioxidants have actually always been used in feed in that way, since they are contained in the vitamin premixes that feed mills use to produce the feedstuffs, in order to ensure the stability and quality of fat-soluble vitamins, such as vitamin A (which is easily oxidised and therefore cannot be used without stabilising agents). However, recent amendments to legislation mean that ingredients have to be listed on the end product, meaning that they could appear on information leaflets, giving rise to apparent non-compliance even though the situation has not actually changed.

Therefore, the text has been adapted to reflect the fact that the law requires these products to be listed in information leaflets when used in premixes. The ban on these products as stand-alone ingredients in feedstuffs, however, remains, as the intention behind that rule is to prevent them from being used as a solution to problems arising from the use of poor-quality feed materials.

— Article 9: 'Livestock originating from other production sectors'

The first two paragraphs of Article 9:

Dairy cows from production chains other than the 'Parmigiano Reggiano' chain may not be introduced into the environments in which milking cows and dry cows are kept until at least four months after their arrival on the holding.

During this period the dairy cows must be fed in compliance with these Rules and any milk they produce may not be delivered to cheese dairies.

have been amended to read:

The introduction of livestock from production chains other than the 'Parmigiano Reggiano' chain, and therefore not included in the control system, onto dairy farms or restocking units must take place no later on the day on which the animal reaches 10 months of age.

This amendment has been included in point 3.3 of the single document.

The key elements that make 'Parmigiano Reggiano' cheese unique can be summarised as follows:

- Territory: this is to be understood in terms of soil, air and water and is essential for its ability to generate food for livestock and keep active the 'good' microflora that are crucial for making and maturing the cheese. In particular, the ban on the use of silage of any kind for dairy cows and the role of forage from pasture such as permanent and temporary grasslands are recognised as key elements for preserving this territory. The delicate microbiological balance necessary for cheesemaking can only be preserved through careful management of the soil, cattle housing and cheese dairies.
- Livestock: livestock management, proper nutrition in particular, helps animals to develop the ability to transform the rations they are fed into milk, their productive response, health and longevity. It therefore makes sense for the product specification to encourage greater focus on these issues, including when new information becomes available.
- 'Good' microorganisms for cheesemaking: these have always been considered to play an essential role in making 'Parmigiano Reggiano' cheese unique.

All the rules of the current product specification are designed to promote a favourable microbiological habitat from the field to the farm to the dairy. In particular, banning silage of all kinds in the rearing of female calves, heifers up to the sixth month of gestation and dairy cows, coupled with a hay-based diet, form the cornerstones of an approach to the selection of the flora specific to the 'Parmigiano Reggiano' production area, in terms of both 'good' and 'bad' flora.

On the basis of these brief fundamentals, it is considered important that the product specification evolve and lay down rules on managing the female calves and heifers that, once mature, will produce milk to be made into cheese. For a long time now, the rules on the diet fed to milking cows in the product specification have also applied to dry cows and heifers from the sixth month of gestation. These rules are not just aimed at preventing any deterioration in the quality characteristics of the milk, since the latter two categories do not produce milk, but also (and above all) to guide producers towards a farming model that is consistent with the basic cornerstones: the ban on use of silage, hay-based rations, ruminal ability to process fibre and a focus on all the cattle on the farm. As already mentioned, the current product specification extends the ban on the use and possession of silage of all kinds to the rearing of female calves and heifers up to the sixth month of gestation.

The main aim behind requesting an amendment whereby the introduction of any livestock from other production chains onto a dairy farm, or onto the units, listed in the control system, on which a dairy farm's specific restocking activities are conducted, must take place by the age of 10 months is to improve and increase the cow's capacity to adapt for life to the typical diet of the holdings included in the 'Parmigiano Reggiano' PDO control system and already fed to the cows reared directly in the production area, with the use of forage and a ban on the feeding of silage.

While theoretically speaking these animals should ideally be brought onto holdings as soon as they are weaned so that they can be adapted for life to the typical diet of the farms included in the control system for 'Parmigiano Reggiano' PDO, 10 months of age is considered sufficiently early to achieve a clear improvement on the situation under the current product specification. This proposal represents a fair compromise, avoiding imposing a major economic burden on those who are currently rearing young livestock outside the 'Parmigiano Reggiano' PDO production chain.

Moreover, in view of the general tendency to impregnate heifers at an increasingly early age, in some cases close to 12 months, the requirement that animals be introduced by 10 months would ensure that fertilisation takes place on farms within the PDO production chain with the aim of genetic improvement.

Requiring that cattle be fed a silage-free diet from their 10th month of life aims to ensure that their rumens develop with hay, which means that they can be expected to develop anatomical and histological characteristics that are better suited to the subsequent stage of milk production, meaning that the cows will function better on that type of diet. It is widely thought that feeding female calves and heifers a diet based on the predominant use of dry forage, rather than silage, has a positive influence on their morphological development, resulting in greater abdominal depth and increased ingestion capacity, and reduces the risk of excessive fat cover (something which the misuse of maize silage is particularly prone to causing).

Recent research has found that feeding hay to heifers brings benefits in terms of dry matter intake and growth, and that consuming hay rather than silage has a positive impact on the animal's forage utilisation capacity, presumably as a result of a better morpho-functional development of the growing heifer's rumen. It should also be added that the use of rations that are acidogenic due to a starch-heavy imbalance, as rations based on cereal silage (and maize silage in particular) typically tend to be, can cause tissue damage in the ruminal mucosa (erosion) and the liver (abscesses). This damage, which is irreversible, makes the animals more susceptible to other diseases and less efficient in processing rations based on high-fibre, bulky forage, such as the hay-based rations that are typical of the farms included in the 'Parmigiano Reggiano' PDO control system. This damage is very rare in animals whose diet is based on unensiled forage, hay in particular.

In comparison with silage use, feeding heifers fresh forage and hay also drastically reduces the risk of them ingesting mycotoxins, the potential effects of which include impairing the animal's immune system, making it more prone to disease and thus reducing its longevity.

This amendment also seeks to improve controls in the certified production system of 'Parmigiano Reggiano' cheese, giving the end consumer increased assurance that the product complies with the product specification.

The product specification currently prohibits the use and possession of silage of any kind in the rearing of female calves, heifers up to the sixth month of gestation, and dairy cows. The 'quarantine' requirement laid down in Article 9 of the *Cow Feeding Rules* in the current product specification is specifically aimed at reducing the risk of spore contamination in the environment in which dairy cattle whose milk is used to make 'Parmigiano Reggiano' are housed, which is why during this 'quarantine' period operators are required to properly segregate cows from production chains other than the 'Parmigiano Reggiano' chain, keep their milk separate and keep the relevant farm records.

Over time, the checks carried out to make sure that the 'quarantine' rules are being followed in compliance with the current product specification have revealed numerous failures to respect the 'quarantine' requirement in the terms laid down in the control plan for 'Parmigiano Reggiano' PDO.

More specifically, the authorised 'Parmigiano Reggiano' PDO control body found 12 instances of 'major non-compliance' in checks on compliance with the 'quarantine' requirement between 2012 and 2017. These instances of 'major non-compliance' led to the consequences laid down in the 'control table' relating to the handling of the raw material and, in particular, to the exclusion of the product from the PDO, as well as the adoption of remedial measures by the affected operators in order to eliminate the cause or causes. In the same period, the authorised control body found 639 instances of 'minor non-compliance' that led to the adoption of remedial measures by the affected operators in order to eliminate the cause or causes.

Moreover, instances of 'major non-compliance' recorded in 2018 (5) and 2019 (4) show a proportional increase on the previous period (2012-2017), implying that it is becoming more common.

Requiring that cows be brought into the chain by the age of 10 months would, firstly, be much easier for the authorised control body to check, since the animal's age (since birth) can be easily found out from databases, whereas the current 'quarantine' checks centre on a stage in the cow's life (sixth month of gestation, milking or dry period) which varies depending on when impregnation occurred.

Furthermore, 'quarantine' as it is currently understood would no longer be necessary since, as already mentioned, from the age of 10 months the cow would have sufficient time to adapt to the typical diet (because, on average, it will still be approximately another 12-14 months before it starts producing milk) and there would be no risk of the operator mismanaging the segregation of animals in 'quarantine' and their milk flows that might cause issues with the cheese (something that could occur at present if a cow is already lactating when brought onto the farm).

— Article 10: 'Entry of new farms into the production chain'

The third paragraph of Article 9: *Agricultural holdings not belonging to the 'Parmigiano Reggiano' production chain are not authorised to provide milk until at least four months after the inspection visit.*

is now Article 10, entitled 'Entry of new farms into the production chain' and has been amended as follows:

Agricultural holdings not belonging to the 'Parmigiano Reggiano' production system are not authorised to provide milk until at least four months after the inspection by the authorised control body.

The text now specifies that the party responsible for checking compliance with these requirements is the control body.

— Article 11

Article 10 is now Article 11, retaining the title 'Total mixed ration feeding'.

— Article 12: 'New products and technology'

Article 11: *Any use of foodstuffs not covered by these Rules, variations in the prescribed quantities or the introduction of methods of preparation and administration not laid down herein are subject to a positive outcome in the tests and studies assessed by the Parmigiano-Reggiano Consortium. If the outcome is positive, an application for the product specification to be amended may be made accordingly.*

is now Article 12 and has been amended as follows:

Any use of foodstuffs not covered by these Rules, variations in the prescribed quantities or the introduction of methods of preparation and administration not laid down herein are subject to a positive outcome in the tests and studies assessed by the Parmigiano-Reggiano Cheese Consortium. If the outcome is positive, as well as being adopted based on the provisions of Article 6, must be added to the product specification the next time it is being amended.

It is specified that any use of animal feed and technology not covered by the Cow Feeding Rules, variations in the prescribed quantities or the introduction of methods of preparation and administration must first have a positive outcome in the tests and studies assessed the Consortium. If the outcome is positive, as well as being adopted based on the provisions of Article 6, they must (no longer 'may') be added to the product specification the next time it is being amended.

Finally, the word 'Cheese' has been inserted to give the Consortium's proper name.

SINGLE DOCUMENT

'PARMIGIANO REGGIANO'

EU No: PDO-IT-0016-AM06 — 2.12.2021

PDO (X) PGI ()

1. **Name(s)**

'Parmigiano Reggiano'

2. **Member State or Third Country**

Italy

3. **Description of the agricultural product or foodstuff**

3.1. *Type of product*

Class 1.3. Cheeses

3.2. Description of the product to which the name in (1) applies

'Parmigiano Reggiano' is a hard, cooked-curd, slow-matured cheese made from raw cow's milk, which is partially skimmed by allowing the cream to rise to the surface. The milk must not undergo any heat treatment or physical or mechanical treatments and must come from dairy cows fed primarily on forage from the area of origin. The cheese must be matured for at least 12 months. 'Parmigiano Reggiano' can be sold as whole wheels, in portions or grated.

'Parmigiano Reggiano' may not be subjected to any treatment that impairs its chemical/physical or organoleptic characteristics and has the following characteristics:

- wheels of cheese with slightly convex or almost straight sides with a slightly raised edge on the flat faces;
- dimensions: wheels measure 35-43 cm in diameter across the flat faces and 20-26 cm high;
- minimum weight: 30 kg per wheel;
- rind colour: natural straw colour, which may change over time;
- rind thickness: around 6 mm;
- cheese paste colour: from light straw-coloured to straw-coloured;
- characteristic aroma and taste of the paste: fragrant, delicate and flavoursome without being strong;
- texture of the paste: fine-grained and flaky;
- minimum fat content in dry matter: 32 %;
- no additives;
- cyclopropane fatty acid ratio: less than 22 mg per 100 g of fat (already accounting for measurement uncertainty, determined by gas chromatography-mass spectrometry [CG-MS]).

3.3. Feed (for products of animal origin only) and raw materials (for processed products only)

The rearing of replacement dairy cows ('restocking') must be carried out in the defined geographical area and included in the control system as a specific activity of a dairy farm. The use and possession of silage of any kind are prohibited.

The introduction of livestock from production chains other than the 'Parmigiano Reggiano' chain, and therefore not included in the control system, onto dairy or restocking farms must take place no later on the day on which the animal reaches 10 months of age.

Dairy farms that had restocking activities located outside the defined geographical area as at 5 January 2021 may continue to conduct this activity outside the area of origin provided that it is included in the control system.

The dairy cows' diet is based on forage from the defined geographical area and is specified by quantity and quality.

At least 75 % of forage dry matter must be produced within the geographical area.

Non-forage feedstuffs may make up at most 50 % of the dry matter of the ration.

The use and possession of silage of any kind are prohibited.

Cow's milk, salt, calf rennet.

The milk must be produced on farms located in the defined geographical area and included in the control system.

3.4. Specific steps in production that must take place in the identified geographical area

The milk must be made into cheese within the defined geographical area. The milk from the evening and morning milkings is delivered to the dairy raw and untreated, observing the product specification. The morning milk is placed in copper vats and mixed with the milk from the previous evening, partially skimmed by allowing the cream to rise to the surface. The fat-to-casein ratio of the milk in the heating vats, calculated as the weighted average of all vat batches in a given day's production, cannot exceed 1,10 + 10 %. A continuous whey starter, a natural culture of lactic acid bacteria obtained by leaving 'sweet' whey left over from previous cheesemaking operations to spontaneously ferment

in controlled temperature conditions, is added to the milk. The use of commercial starter cultures is not permitted. Following coagulation, for which only calf rennet can be used, the curds are broken up and scalded. Once the cheese mass has sunk to bottom of the vat, it is set in moulds. The cheeses are then marked. After some days, the cheeses are soaked in brine and then matured for at least 12 months. The cheeses may be matured on wooden-shelved racks.

The minimum 12-month maturing period must take place in the defined geographical area.

After the minimum maturing period, a quality inspection is performed to check compliance with the product specification.

3.5. *Specific rules concerning slicing, grating, packaging, etc. of the product the registered name refers to*

'Parmigiano Reggiano' can be sold as whole wheels, in portions or grated.

In the interests of consumer protection, in order to guarantee the authenticity of pre-packaged, grated or portioned 'Parmigiano Reggiano' placed on the market, grating, portioning and subsequent packaging must take place in the defined geographical area. This is necessary because the markings that identify a whole cheese as 'Parmigiano Reggiano' are lost or are not visible on grated cheese or portions, so the origin of the pre-packaged product has to be guaranteed. This is also necessary because the cheese needs to be packaged quickly after portioning and using procedures that prevent it from becoming dehydrated or oxidised, or from losing its original 'Parmigiano Reggiano' organoleptic characteristics. Cutting into a wheel of cheese deprives the cheese of the natural protection afforded by the rind, which – itself being highly dehydrated – insulates the cheese very well from the surrounding environment.

Only whole cheeses bearing the protected designation of origin 'Parmigiano Reggiano' may be grated. It must be packaged immediately after grating and may not be subject to any processing or have any substance added to it. However, the use of 'trimmings' is also permitted under the conditions set out above. The rind content in grated 'Parmigiano Reggiano' cheese must be no more than 18 % by weight.

Offcuts of 'Parmigiano Reggiano' which are to be used by operators within the control system to prepare other formats are referred to as 'trimmings'.

Grating, portioning, and pre-packaging for direct sale may be carried out at the retail outlet solely for the purpose of sale to the end consumer.

3.6. *Specific rules concerning labelling of the product the registered name refers to*

The identity markings found on each 'Parmigiano Reggiano' cheese are the words 'Parmigiano Reggiano' in pin-dot lettering, together with the registration number of the dairy that made it, the year and month of production, and the abbreviation DOP (PDO), printed around the sides of the wheel of cheese using a stencilling band, an oval stamp with the words *Parmigiano Reggiano Consorzio Tutela* ('Parmigiano Reggiano Protection Consortium'), a casein disc or an equivalent system that ensures the unique identification of each cheese, and, the 'category two' stamp for cheeses from that category.

Pre-packaged, grated and portioned 'Parmigiano Reggiano' cheese placed on the market is identified by a logo containing a stylised depiction of a wedge and a wheel of 'Parmigiano Reggiano' cheese above the words 'PARMIGIANO REGGIANO'.



This logo, which is a mandatory component of the labelling, must be printed in colour following the technical specifications laid down by the pertinent Consortium agreement.

To make it possible to find out how mature 'Parmigiano Reggiano' is, the minimum maturing time must be stated on the label of all pre-packaged portions of more than 15 g placed on the market.

As the aroma and taste of the paste of 'Parmigiano Reggiano' evolve over the course of the maturing process, in order to convey the organoleptic characteristics, the following descriptive adjectives may be used on the label, as well as the maturing time, for certain maturity classes:

- *delicato* [delicate] (12-19 months);
- *armonico* [harmonious] (20-26 months approx.);
- *aromatico* [aromatic] (27-34 months approx.);
- *intenso* [intense] (35-45 months approx.).

Except when used as 'trimmings', offcuts from the faces and sides of wheels of cheese (pieces with more than 18 % rind) cannot bear the name 'Parmigiano Reggiano'.

4. Concise definition of the geographical area

The defined geographical area comprises the part of the province of Bologna to the left of the River Reno, the part of the province of Mantua to the right of the River Po, and the provinces of Modena, Parma and Reggio Emilia.

5. Link with the geographical area

Among the most important natural factors are the characteristics of the soil found within the defined geographical area – which extends from the Apennine ridge to the Po – coupled with climate conditions that directly influence both the composition of the natural flora and fermentation processes in the product. With regard to human factors, as well as the historical importance of the cheese to the local economy, it should be noted that the complex operations performed on 'Parmigiano Reggiano' cheese have been developed over centuries of traditional cheesemaking practices within the production area, handed down from generation to generation with respect for authentic and unvarying local practices.

A fine-grained and flaky texture, a fragrant aroma, a delicate taste – flavoursome without being strong – and high solubility and digestibility are distinguishing features of 'Parmigiano Reggiano' cheese.

These features reflect the unique qualities of the milk used for cheesemaking – raw milk is processed daily in copper vats and coagulated using calf rennet with a high rennin content – and the criteria used to select it, as well as the practice of soaking the cheeses in saturated brine and the extended maturation period.

The specific physical, chemical and microbiological properties of the milk that guarantee the specific characteristics and quality of 'Parmigiano Reggiano' cheese are basically the result of the diet fed to the dairy cows, based on forage from the area of origin and with a strict ban on the use of silage of any kind. The minimum twelve-month maturing period, which – due to the specific climate conditions present – must take place within the defined geographical area, is a necessary stage to bring about the specific enzyme processes through which the product obtained by processing milk can take on the characteristics that are unique to 'Parmigiano Reggiano'.

Reference to publication of the specification

<http://www.politicheagricole.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/3335>
