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were supported with free advice

27 May 2010

[REDACTED]
Council Regulation (EC) No 510/2006 – “Staffordshire Cheese” Amendment Application

I refer to recent correspondence concerning a proposed amendment to the above named specification.

Staffordshire Trading Standards Department are the inspection body for this PDO and as such have no objection to the co-existence of the names “Staffordshire Cheese” and “Staffordshire Organic Cheese” in the terms outlined in the amendment.

There may be an issue however in the future if, due to market forces there is a difficulty in sourcing organic milk or “Staffordshire Organic Cheese” has to diversify and use non organic milk. The issue would then be how the new product would be described as the organoleptic properties and current methodology of cheese production does not comply with the “Staffordshire Cheese” PDO. As the cheese has an established reputation it is unlikely that the producer will want to fundamentally alter the food name to remove the “Staffordshire Cheese” element as this could infer a different type of cheese rather than merely changing the status of a raw material.

I have been in discussion with [REDACTED] of Defra in regard to other issues relating to this specification and he has advised this consultation is the arena to raise such matters.

I outline below the issues of concern:

- 1) **Specification Clarification (4.2)** - There are discrepancies between the first specification issued in 2007 and the specification attached to the amendment material in regard to compositional **criteria such as fat content and fat in dry matter percentages**.

As Staffordshire Trading Standards submit samples to the Public Analyst for confirmation as to the compositional standard it is imperative we are assessing compliance against the correct criteria.



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- 2) **Size of Cheese** – The current specification states that the cheese is 'cylindrical in shape, weighs 8-10 kgs.....' this is prescriptive and currently one of the producers makes 12kg cylindrical cheeses. Whilst this is a minor point it would be helpful if the size criteria is widened to allow some variation in sizes, e.g. 8-12kg.
- 3) **Cloth Bound (4.2)** – The current specification includes the statement "... is sold cloth bound". This is not necessarily the case as much of the product is broken down from bulk and repackaged in smaller retail packs. This sentence should be amended to omit the word "sold"
- 4) **Proof of Origin (4.4)** – This portion of the specification needs radical amendment as it is producer specific (Staffordshire Cheese – Cheddleton) and the milk supplier, DFB is no longer trading. As the specification requires that only Staffordshire milk is used and the General Food Regulations 2004 require "one up , one down " minimum traceability standard this section should specify that the producer must be able to provide documentation to substantiate that milk sourcing is from Staffordshire farms only. The mechanism to achieve this requirement should be left up to the individual producer.
- 5) **FSA Food Safety Workbook (4.4)** – The above logic applies to this section as it references a particular system which facilitates traceability of the finished product. The mechanism to achieve finished product traceability should be left to the individual producer as it is a legal requirement and will be assessed at the routine Food Safety Act inspections.
- 6) **Method of Production (4.5)** – The procedure is very prescriptive and does not allow for variation which may be needed, for example, due to variation of the milk supply or use of slightly different equipment to make the cheese. Although the two current producers have both been advised by the same consultant on how to produce the Staffordshire Cheese, and both use the same basic method, variation from the PDO does occur, examples include:
- Requiring the overnight storage and chilling of the milk, as some producers use their own milk straight off the line.
 - There is an instruction to incorporate Staffordshire Cream into the product but there is no indication as to quantity. Cream is not used at all by one producer as the fat content of the milk is sufficiently high as to make the addition of cream unnecessary.
 - The pasteurising process indicates it is a HTST (high temperature, short time) method. However there are other ways of achieving pasteurisation i.e. lower temperature over a longer time period, which is currently used by one supplier.
 - The method of production specifies various time periods for activities to occur, the actual times needed for each activity will vary depending on the milk, room temperature and equipment used, (for example the size of the vat used to make the cheese).
 - The 2.5% salt content is based on a calculation using the weight of finished cheese rather than the volume of curds. The actual amount added is closer to 0.6% of the curds. As the maturation process varies between 2 and 52 weeks the salt content of the finished cheese will vary. The target currently used for finished cheese before maturation is 1.6% which results in 2% salt in the

cheese as sold. In regard to the finished product compositional criteria is there an accepted tolerance?

As an inspection body we would prefer paragraph 4.5 to be simplified, or, if this is not possible, we would appreciate guidance from DEFRA on the degree of variation from this paragraph of the PDO which is permitted.

- 7) **Link (4.6)** - This Service cannot comment on the veracity of the meteorological , geographical properties quoted in the PDO which underpin the distinctiveness other than to query if the characteristics are county wide or are they only applicable in the north of the County?

If the climatic and geographical properties are not County wide how much latitude does the inspection body have as these are quoted as having a direct impact on the distinctiveness of "Staffordshire Cheese"?

- 8) **Inspection Body (4.7)** – Staffordshire Trading Standards Service is based in three locations, Stafford (Headquarters), Newcastle under Lyme and Burton on Trent. As theoretically Staffordshire Cheese could be produced county wide it is requested that for administration purposes the Stafford office address is used :

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At Staffordshire County Council Trading Standards we aim to support businesses through the provision of detailed advice and on legal requirements. We are also very supportive of any initiatives, such as the PFN scheme which provides businesses with a distinctive and recognised mark which can be used in the marketing of their products.

In our opinion, in it's current form, the Staffordshire Cheese PDO is overly prescriptive, making it difficult for businesses to produce a cheese which meets the organoleptic criteria for Staffordshire Cheese without deviating from paragraphs 4.4 and 4.5 of the PDO. We would also welcome clarification of the compositional requirements for fat, fat in dry matter and salt in this cheese.

Thank you for providing the opportunity to reply to this consultation, if you would like any clarification of any aspects of this letter please contact me.

Yours sincerely



Principal Trading Standards Officer