



AMERICAN CHEESE SOCIETY
POSITION STATEMENT ON THE SAFETY OF AGING CHEESE ON WOOD
Issued in Response to the Recent Food & Drug Administration (FDA) Statement
on the Use of Wooden Shelves for Cheese Aging

Released June 10, 2014

For centuries, cheesemakers have been creating delicious, nutritious, unique cheeses aged on wood. Today's cheesemakers—large and small, domestic and international—continue to use this material for production due to its inherent safety, unique contribution to the aging and flavor-development process, and track record of safety as part of overall plant hygiene and good manufacturing practices. No foodborne illness outbreak has been found to be caused by the use of wood as an aging surface.

The American Cheese Society (ACS) strongly encourages FDA to revise its interpretation of the Code of Federal Regulation (21 CFR 110.40(a)) to continue to permit properly maintained, cleaned, and sanitized wood as an aging surface in cheesemaking as has been, and is currently, enforced by state and federal regulators and inspectors.

It is ACS's position that:

- Safety is paramount in cheesemaking.
- Cheeses aged on wood have a long track record of safety, and have long been produced meeting FDA standards.
- Wood can be safely used for cheese aging when construction is sound and in good condition, and all surfaces are properly cleaned and maintained using sanitation steps that assure the destruction of pathogens, including but not limited to:
 - All surfaces are free of defects;
 - Any wood preservatives used are safe and acceptable for direct food contact;
 - Inspection and cleaning procedures are followed that specify:
 - Frequency of inspection and testing
 - Frequency of cleaning and sanitizing
 - Methods used that adequately clean boards which might include:
 - Kiln-drying
 - Air-drying
 - Heat-treating
 - Sanitizing with acceptable products
 - Inoculation to create and maintain positive biofilm
 - Raising the core temperature of the wood above pasteurization temperatures
 - Ongoing monitoring and verification of the effectiveness of all procedures per the Hazard Analysis and Risk-based Preventive Controls (HARPC) provision of the Food Safety Modernization Act (FSMA)
 - Corrective actions to address any issues
 - Discarding of wood that is deteriorated and/or in poor repair

Furthermore, ACS believes:

- Traditional methods of cheesemaking can and do meet food safety standards.
- U.S. consumers should have access to a wide variety of domestic and imported cheeses, including those safely aged on wood.

- State and federal regulators and inspectors must work collaboratively with cheesemakers to understand how traditional methods and materials can comply with current food safety standards.
- Many of the finest and most renowned cheeses from around the world are at risk of disappearing from the U.S. market if regulatory and enforcement changes under FSMA eliminate traditional materials and methods.
- FDA should provide timely notification, hold proper listening sessions and comment periods, review all available scientific data, and include consideration of industry stakeholders before modifying long-standing interpretation or implementation of its regulations which impact American businesses.

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About the American Cheese Society (ACS)

ACS is the leading organization supporting the understanding, appreciation, and promotion of artisan, farmstead, and specialty cheeses produced in the Americas. At 1,500 members strong, ACS provides advocacy, education, business development, and networking opportunities for cheesemakers, retailers, enthusiasts, and extended industry. ACS strives to continually raise the quality and availability of cheese in the Americas. Since its founding in 1983, ACS proudly hosts the foremost annual educational conference and world-renowned cheese judging and competition. The 2014 ACS Conference & Competition will be held in Sacramento, CA from July 29-August 1, 2014. Visit <http://www.cheesesociety.org> to learn more.