April 3, 1997

TO: Chair, NACMCF
FROM: Chair, Cheese Subcommittee
SUBJECT: Review of Scientific Literature Regarding the Sixty-Day Aging Process for Hard Cheese

At the request of the FDA liaison to the NACMCF, the Cheese Subcommittee reviewed scientific literature regarding the sixty-day aging process for hard cheese. This literature shows that pathogenic organisms are found in raw milk (and milk not subjected to a pasteurization-equivalency process) and can survive the sixty-day aging process. In this aging process, important factors such as water activity and pH vary depending on the microenvironment of the product and pathogens may not be effectively controlled. These factors inherently contribute to microbial growth and do not lend themselves to control in the aging process (i.e., areas at or near the product surface vs. areas at or near the product core).

The Cheese Subcommittee concludes that the sixty-day aging process for hard cheese is questionable as an effective measure in support of the public’s health. The presence of pathogenic organisms in this processed food product poses a potential risk to consumers. Therefore, the Cheese Subcommittee recommends that the FDA re-examine its current policy regarding the sixty-day aging period for hard cheese made from raw milk.