



DRY-GUD-031	Dairy
Revision: 1.0	Wood Board for Aging Cheese Variance Guidance
Approved: 12/03/2025	Wisc. Stat. and/or Wis. Admin. Code: 65.28(2)

SUBJECT: Wood Board for Aging Cheese Variance Guidance

Scope

To provide guidance for submission requirements for a wood board variance for curing cheese.

Dairy Technical Specialists (DTS) will use this guidance document to evaluate variance applications for the use of wood boards in dairy facilities.

Definitions

- **Cheese Mites:** tiny arachnids that live on cheese when conditions are favorable.
- **Close-grained Wood:** wood varieties with small, uniform pores that result in smoother texture.
- **Composite Wood:** Boards partially made of wood fibers, sawdust, veneers, or scraps pressed into a board shape. This could also include woods of different species pressed into one board for a pattern.
- **Curing Cheese:** Flavor development in cheeses permitted in 21 CFR 133 as part of the standardized make process.
- **Smear Ripened Cheese:** Cheese wiped with a solution to inoculate the cheese with bacteria to develop desired flavors or textures.
- **Solid Board:** a board of the same species of wood throughout, cut in a solid piece.
- **SOP:** Standard Operating Procedure, a detailed, step-by-step, written procedure to guide employees on how to perform a task consistently.

Guidance

Wood shelving may be used for the purpose of curing cheese products when wood is needed by the processor to obtain desirable characteristics in the finished product. ATCP 65.28(2)(a), Wisconsin Administrative Code, allows the department to authorize the use of alternate materials for product contact surfaces. Wood shelving may be considered for use in the curing of cheese if the plant makes a request in writing to the Department and the request is reviewed by a DTS.

Final authorization must be given in writing by the Dairy Section Manager or designee.

Request by the processor shall contain the following:

1. A statement describing the indications for use in your facility and the benefits received through this process.
 - a. What desirable characteristics do wood aging/curing boards achieve in the finished product that other accepted materials do not.
2. A statement indicating the type of wood used.

- a. Types of wood are restricted to close-grained solid boards. Composite materials may not be used.
3. Written narrative or SOP for selection and inspection process for wood boards.
 - a. A written protocol describing the maintenance of the wood shelving that includes procedures for discarding boards with cracks, splinters, or other abnormalities.
4. Environmental Monitoring Program
 - a. Information submitted shall include: target organism, swabbing or monitoring protocol (including frequency), and locations that will be monitored in the curing rooms.
 - i. Program must be in compliance with 21 CFR 117.165(b)(3)
 - b. This may include a swabbing protocol for the wood boards directly.
 - i. This should include a target microorganism with critical limits and corrective actions in the submission.
5. Food Safety Plan
 - a. The use of wood boards must be in the process flow & Hazard Analysis.
 - b. The aging requirements for the cheese, including time and temperatures, must be included in the hazard analysis.
 - c. Qualified Facilities, as defined by 21 CFR 117.3, must provide a written document or SOP identifying the hazards for aging cheese on wood boards, how the hazards are controlled, and monitored.
6. Specific Sanitation Standard Operating Procedures (SSOP):
 - a. These SSOP's must adequately maintain sanitation of the wood.
 - i. Procedure should include the specific time, temperature, frequency of cleaning, and concentration of the chemicals utilized.
 - ii. A scientifically validated cleaning and sanitizing process.
 - iii. An internal inspection procedure must be in place that includes corrective action when wood cannot be cleaned or is in poor repair (discard wood).
 - iv. Include a sample of the record where sanitation parameters are recorded for the cleaning and sanitation completed.
 - b. Alternative sanitizing methods for smear ripened cheeses will be reviewed when submitted and must include environmental monitoring program and specific sanitation controls for the maintenance of the smear cultures.
7. A strict mite control program is in place and adhered to by the processor.
 - a. Written mite control program is submitted with the application.
8. Scientific Basis for the Safety of Wood Board Use in Cheese Processing
 - a. All components of the written request from the processor are based on sound science in collaboration with a recognized authority.
 - i. The scientific support must match the SSOP submitted in accordance with 6a.i. above.
 - b. The authority providing a basis for accepted practices must recognize all hazards and how they are addressed in the plan including:
 - i. Scientific resources identify the sanitation method, including:
 1. Chemical type (if used), including concentrations & food safe levels.
 2. Temperature of Sanitizing solutions.
 3. Study data showing that the chemical is effective at the usage levels against pathogens.
 4. Research studies/supporting data must be specific to sanitizing wood surfaces.

ContactsDATCPTechnicalSpecialists@wisconsin.gov**References**


ATCP 65, Wisconsin Administrative Code - Milk and Milk Products

Document History

The most recent changes to this controlled document are listed at the top of the table:

Revision	Author	Change Description	Approval Date
1.0	Margot Dahling	New Document	12/03/2025

Approval

■ Brock, Adam D. Please approve Wood Boards for Aging Cheese Variance Guidance DRAFT  12/7/2025 Completed Wood Boards for Aging Cheese Variance Guidance DRAFT Approved