

Area 7E
9 Millbank
c/o Nobel House
17 Smith Square
London
SW1P 3JR
Telephone: 0207 238 6623
Email: simon.johnson@defra.gsi.gov.uk
Web: www.defra.gov.uk

17 November 2011

By email and hard copy to Matthew O' Callaghan (Chairman of the MMPPA) and Andy Naphine (Head of Marketing, Pork Farms)

APPLICATION TO AMEND THE PROTECTED GEOGRAPHICAL INDICATION SPECIFICATION FOR 'MELTON MOWBRAY PORK PIE': DECISION LETTER

Overview

1. The Department for Environment, Food and Rural Affairs ('Defra') has received an application from the Melton Mowbray Pork Pie Association ('MMPPA') to amend the Protected Geographical Indication ('PGI') specification for 'Melton Mowbray Pork Pie' ('MMPP'). Defra considers that the application is justified and meets the criteria of Council Regulation (EC) No 510/2006 on the protection of geographical indications and designations of origin for agricultural products and foodstuffs ('Regulation 510/2006') and will forward the application to the European Commission ('the Commission') for a final decision.

2. We aim to publish this decision letter on our website on **18 November 2011** at:

<http://www.defra.gov.uk/food-farm/food/protected-names/>

Any interested party may submit their views on this decision to Defra within 14 working days from the date of publication of the decision on our website. We will consider any new information and then either confirm or amend our decision.

3. This document comprises five sections:

- (1) The current registration and amendment application
- (2) Relevant legislation
- (3) The national objection procedure
- (4) Further information from the applicant and the objecting party
- (5) Defra's Decision

4. A chronology and a summary of the key documents relevant to this decision are attached as Annexes to this decision letter.

Section 1. The current registration and amendment application

5. The name ‘Melton Mowbray Pork Pie’ was registered as a PGI by virtue of Commission Regulation (EC) No 566/2009 of 29 June 2009. In order to be eligible for a Protected Designation of Origin (‘PDO’) or a PGI, an agricultural foodstuff shall comply with a product specification¹. That product specification shall include ‘a description of the method of obtaining the agricultural [...] foodstuff’.² The summary specification for MMPP³ is attached at Annex 2. Section 4.5 of the summary specification is set out below:

Method of Production

The following raw materials only must be used in the manufacture of Melton Mowbray Pork Pies:

<i>Fresh pork</i>	
<i>Salt</i>	<i>Lard and/or shortening</i>
<i>Wheat flour</i>	<i>Pork gelatine and/or pork bonestock</i>
<i>Water</i>	<i>Spices</i>

The method of production is as follows:

- The pastry ingredients are mixed together, formed into billets and lids, then rested prior to pie manufacture.

- The pork meat is diced or minced and mixed with filling ingredients to form the pie filling.

[...]

6. On 11 January 2010, the MMPPA submitted what it considered at that point to be its finalised application to amend the product specification for MMPP. The proposed amendments as first submitted are set out below:

Method of production (section 4.5 on Specification)	
Amendment	Explanation
<i>Insertion of:</i>	
<i>Glaze (egg and / or milk)</i>	<i>Glaze (egg and / or milk) – This enhances the</i>

¹ Article 4(1) of Regulation 510/2006

² Article 4(2)(e) of Regulation 510/2006

³ As required by Commission Regulation (EC) No 383/2004 of 1 March 2004 laying down detailed rules for applying Council Regulation (EEC) No 2081/92 as regards the summary of the main points of the product specifications.

	golden brown colour of the baked pastry. Egg and milk are widely used in baking both domestically and commercially to enhance the baked appearance of pastry and bread products.
<p><i>Insertion of:</i></p> <p><i>Breadcrumbs or rusk and / or starch</i> <i>Where these ingredients are used the total amount in the final product will not exceed 7%.</i></p> <p><i>Individually,</i></p> <p><i>Breadcrumbs or rusk < 2%</i></p> <p><i>Starch < 5%</i></p>	<p><i>Breadcrumbs or rusk and / or starch – Breadcrumbs, rusk and starch are thickening agents. They ensure that the filling is workable (when raw), act to retain the meat juices when the product is baked and ensure that the meat texture achieved in the baked product is consistent.</i></p>
<p><i>This Amendment Application is submitted to clarify the role of processing agents and other ingredients used in the manufacture of Melton Mowbray Pork Pies. Producers have used the ingredients added for many years. The importance of their inclusion in Para 4.5 was overlooked at the time when the word “only” was added in front of the ingredients list when the original application was forwarded to Brussels. It is specifically noted that these additions do not alter the stated minimum meat content (30% in the final product)⁴⁵, and that the words “filling ingredients” in the original Method of Production refer to the ingredients now listed in the Amendment Application.</i></p>	

7. Although that document did not specify whether the additional ingredients (egg and/or milk, breadcrumbs or rusk and/or starch) were to be included in the mandatory list of ingredients or were optional ingredients, it became clear in correspondence that it was the MMPPA’s intention for these to be included in the specification as optional ingredients. This was further confirmed by the MMPPA’s amended summary specification and finalised amendment application (see Annex 2).

Section 2. Relevant legislation

8. Article 9 of Regulation 510/2006 makes provision for applications for approval of an amendment to a specification to be made. Article 9(1) provides that applications to amend may be made ‘*in particular to take account of developments in scientific and technical knowledge or to redefine the geographical area referred to in Article 4(2)(c)*’ though this is not an exhaustive list of circumstances where applications to amend may be made.

⁵ Paragraph 4.2 of the summary specification requires that ‘*The meat content of the whole product must be at least 30%.*’

9. The application should be addressed to the Member State of the geographical area to which the application relates⁶. Defra, as the competent authority for the UK Protected Food Names Scheme, must decide whether to forward the amendment application to the Commission for a final decision⁷.

10. Defra may only consider an application from a group that meets the requirements of Article 9(1) of Regulation 510/2006:

A group satisfying the conditions of Article 5(1) and (2) and having a legitimate interest may apply for approval of an amendment to a specification.

11. If Defra is satisfied that the applicant group meets the requirements of Article 9(1), Defra shall scrutinise the application⁸. Applications must be drawn up in accordance with Annex VI of Commission Regulation 1898/2006 laying down detailed rules of implementation of Council Regulation 510/2006 ('Regulation 1898/2006') and must describe and give reasons for the proposed amendments⁹. In scrutinising the application, Defra must:

- i. check that the application is justified and meets the conditions of Regulation 510/2006¹⁰;
- ii. carry out a national objection procedure¹¹.

12. In order for an objection to be admissible, it must show that the amendment does not comply with the conditions referred to in Article 2 of Regulation 510/2006¹². Article 2(1)(b) of Regulation 510/2006 is relevant in considering the admissibility of objections:

'geographical indication' means the name of a region, a specific place or, in exceptional cases, a country, used to describe an agricultural product or a foodstuff:

- *originating in that region, specific place or country, and*
- *which possesses a specific quality, reputation or other characteristics attributable to that geographical origin, and*
- *the production and/or processing and/or preparation of which take place in the defined geographical area.*

13. An admissible objection is not determinative of an amendment application (at national or EU level). The detail of an admissible objection must be taken into account by Defra, as decision-maker, when deciding whether to forward the relevant documents to the Commission for a final decision.

⁶ Article 5(4) first indent of Regulation 510/2006. This includes amendment applications by virtue of Article 9(2)

⁷ Article 5(5) third indent of Regulation 510/2006 by virtue of Article 9(2)

⁸ Article 5(4) second indent of Regulation 510/2006 by virtue of Article 9(2)

⁹ Article 9(1) second indent of Regulation 510/2006

¹⁰ Article 5(4), second indent of Regulation 510/2006 by virtue of Article 9(2)

¹¹ Article 5(5), first indent of Regulation 510/2006 by virtue of Article 9(2)

¹² Article 5(5) second indent and Article 7(3)(a) of Regulation 510/2006

14. Defra's decision is based on whether it considers that the amendment application is justified and consistent with the conditions of Regulation 510/2006, taking into account the information provided in any admissible objections.

Section 3. The national objection procedure

15. ADAS, Defra's delivery agent for the Protected Food Names Scheme, launched the formal 12 week consultation period on the MMPPA's amendment application on 16 March 2010. The closing date for receipt of objections was 8 June 2010. There was one objection to the application to amend the specification. That objection came from Pork Farms, a producer of MMPP which is not a member of the MMPPA¹³.

16. Pork Farms submitted its objections to the MMPPA's amendment proposal before the formal consultation period began in a letter dated 10 February 2010. Pork Farms did not object to the inclusion of 'glaze (egg and/or milk)' or 'Breadcrumbs or rusk <2%' as optional ingredients permitted in the manufacture of MMPP but objected to 'the use of starch'. Its rationale for the objection was as follows:

'Starches and other processing agents would not have been used historically in the production of a Melton Mowbray Pork pie. There are many different types of starch maize, pea, potato to name a few. Potato starch is currently used by some manufacturers in the production of Melton Mowbray pies however we would like to see evidence that any of these starches were historically used in the production of Melton Mowbray pies. Again the primary function of adding these starches is to absorb moisture which adds weight to the pie making it a cheap filler.'

'We feel therefore that the addition of starch is not therefore in the spirit of PGI and would only serve to lower the quality of the Melton Mowbray pie.'

17. As this objection was lodged before the beginning of the formal consultation period, ADAS sought confirmation from Pork Farms that it wished to maintain its original objection. Pork Farms confirmed this by email on 20 May 2010.

Section 4. Further information from the applicant and the objecting party

Response from MMPPA

18. The MMPPA's response to the objections raised by Pork Farms can be summarised as follows:

¹³ Pork Farms was granted a transitional period of up to five years (from 20 July 2009) within which to make the necessary adjustments to its business following protection of the name, MMPP in accordance with Article 13(3) of Regulation 510/2006.

Part 1 - Is the objection raised by Pork Farms admissible?

- i. The MMPPA argued that the objection lodged was not admissible as Pork Farms had not demonstrated that the proposed amendment showed non-compliance with the conditions of Article 2(1)(b) of Regulation 510/2006.
- ii. The MMPPA noted the lack of supporting evidence provided by Pork Farm to show that the use of starch or processing agents would lower the quality of a MMPP or lower its reputation. In the absence of such evidence the MMPPA argued that the objection could not be considered as admissible.

Part 2 - Factual and evidential issues in relation to the objection raised by Pork Farms

- i. The MMPPA set out a detailed response in support of its position (i.e. the use of starches and other processing aids does not lower the quality or reputation of a MMPP). The MMPPA also submitted a copy of a technical report from the Technical Manager at Walkers Charnwood Bakery (a MMPPA-member producer). This was included as evidence to demonstrate that, contrary to the claim made by Pork Farms, the use of starch and similar agents improve the quality of the pies by: controlling boil-out¹⁴ of the free liquid fat; acting as a binding ingredient; and stabilising the meat filling before it is put into the pastry shell. This is necessary where manufacturers are producing the pies in large quantities to meet consumer demand. The MMPPA also referred to an example of packaging it had sent to Defra in 2004 of a Pork Farm-produced MMPP which contained starch.
- ii. The MMPPA also refuted the suggestion that starch is used as a cheap filler. In particular it cited the fact that there is a minimum meat content for the pies which would remain unchanged by the proposed amendment. It enclosed a copy of packaging for a Pork Farms MMPP which had a high meat content of 46% but included starch as well.
- iii. The MMPPA referred to the large number of registered PDO and PGI products and those seeking registration which include starch in the ingredients. In its view this illustrates the wide use of starch for all sorts of purposes related to food preparation. It also referred to the fact that the proposed amendments are worded in such a way as to place a limit on the amount of such processing agents and/or starch that can be used.
- iv. The MMPPA concluded by emphasising that the reference to starch and other processing aids is not a new addition to the PGI specification. This was purely a tidying up and clarification issue. It

¹⁴ During baking the liquid fat will 'boil out' through the hole in the top of the pie and cause black marking on the pastry.

was always intended that starches and other processing aids should be included within the list of ingredients. They have always been used in the manufacture of MMPP.

Further information/response from Pork Farms

19. Pork Farms response to the MMPPA's letter can be summarised as follows:

- i. Pork Farms' challenge is based on the quality and processing angle, not on whether it is the first time starch has been used in pork pie manufacture.
- ii. Pork Farms strongly challenged the claim by the MMPPA that the amendment was just a '*tidying up exercise*'. Pork Farms had been informed by a representative of the MMPA that the MMPPA had made a mistake in missing out potato starch from the permitted ingredients. Pork Farms was not formally aware of amendments being sought until it challenged the use of starch in MMPP on shelves.
- iii. Pork Farms argued that whether starch was used before the name MMPP was protected is irrelevant as it was only after the name was registered that there was a recognized specification against which compliance could be verified.
- iv. Pork Farms noted that only 2 of the 9 members of the MMPPA were using potato starch in the manufacture of MMPP.
- v. It challenged the MMPPA's assertion that there is a need to include potato starch in MMPP to increase production volumes "*to satisfy consumer demand*" and to reduce factory wastage. Pork Farms' experience is that the addition of potato starch effectively stops "boil out" of the filling leading to a more consistent looking pie. Its consumer feedback is that boil out is expected on a traditional pork pie and adds to the perception of high quality, carefully crafted authentic products.
- vi. It stated that Pork Farms is the only large scale manufacturer that is producing authentic PGI compliant pies. Pork Farms regularly produce MMPP at a rate of 19,200 pies per hour with no issues relating to boil out, disposal of waste, or indeed, any issues relating to a reduced efficiency.
- vii. Pork Farms felt that the fact that other PGIs, PDOs and TSGs might use starches and processing aids is irrelevant to the MMPP PGI.
- viii. It highlighted that it invested £12m in its Nottingham factory to ensure it was in a position to meet the proposed PGI legislation. Whilst being granted a 5 year period of transitional relief, Pork Farms was in a position to demonstrate that it is actively moving towards full PGI compliance.

- ix. Pork Farms' views are that using starch for product consistency and '*scale of manufacture*' seems to go against the intent of the PGI which is to protect products that are deemed to have a rich heritage and drive high quality perceptions from consumers.

Next steps taken

20. ADAS forwarded all the relevant paperwork to Defra in November 2010 in order for Defra to make a decision on the application. Representative(s) from Defra met with both the objecting party, Pork Farms (at Pork Farms' factory in August 2010 and at Defra offices in December 2010) and with the applicant, MMPPA (at the factory of a MMPPA-member producer, Walkers Charnwood, in December 2010). At these meetings both sides were given the opportunity to provide additional information in support of their respective positions and also to demonstrate firsthand the effect of using (or not using) starch and the other additional ingredients proposed in the amendment in the production of MMPP.

Section 5. Defra's decision

21. A preliminary issue for Defra to consider is the admissibility of the objection of Pork Farms. The MMPPA argued that the objection is not admissible as Pork Farms had not demonstrated that the proposed amendment showed non-compliance with the conditions of Article 2(1)(b) of Regulation 510/2006 (see paragraph 12 above). It is our view that the objection is admissible. Pork Farms' objection is that the addition of starch would have an adverse effect on the quality of the MMPP. This goes directly to Article 2(1)(b). Although Pork Farms did not produce evidence in support of its objection in its letter dated 10 February 2010, Defra felt that, in the interests of fairness, the objection merited further investigation.

22. Defra is satisfied that the MMPPA meets the conditions of Article 9(1) of Regulation 510/2006. The MMPPA is an association representing a number of MMPP producers and, therefore, is a group in accordance with the definition provided in Article 5(1) of Regulation 510/2006¹⁵. It meets the requirements of Article 5(2) as the application relates to the agricultural foodstuff the group produces¹⁶. The MMPPA also have a legitimate interest in making the application¹⁷. It is therefore entitled to make an application to amend the specification for MMPP.

23. Defra is also satisfied that the amendment application submitted by the MMPPA complies with the rules for requesting approval of changes to product specifications as set out in Article 16 and Annex VI of Commission Regulation 1898/2006.

24. Defra considers that the MMPPA's application to amend the specification for MMPP is justified, meets the conditions of Regulation 510/2006 and should be forwarded to the Commission. In reaching this view, we have considered the following points:

¹⁵ As required by Article 9(1) of Regulation 510/2006

¹⁶ As required by Article 9(1) of Regulation 510/2006

¹⁷ As required by Article 9(1) of Regulation 510/2006

(I) Clarification of the role of optional ingredients in the manufacture of MMPP

25. In its amendment application, the MMPPA states that breadcrumbs/rusk/starch and egg/milk glaze have been used in the production of MMPP for many years and an oversight led to this not being made plain in the original application to register MMPP as a PGI. This is borne out by the documents submitted by the MMPPA both for the original registration application and the amendment application.

26. The original application by the MMPPA to register MMPP as a PGI is dated 15 December 1999 (at Annex 2) and included optional materials in the raw materials section:

The following optional materials may also be used to meet customer specifications, binding agents, glazing agents, flavour enhancers, pastry relaxants.

27. Although none of the five optional ingredients proposed by the MMPPA in its amendment application are mentioned by name, it is reasonable to assume that all five were intended to be covered in the list of optional ingredients. Breadcrumbs, rusk and starch are binding agents. Egg and milk are glazing agents. The proposed list of optional materials was not limited to certain types of binding or glazing agents. Further, all five ingredients were being used by producers of MMPP to varying degrees at the time the application was made.

28. Following receipt of this original application, Defra prepared a detailed specification (in the format required by the Commission) in consultation with the MMPPA. In November 2002 Defra circulated the application and specification for consultation. In the section of the specification relating to method of production the wording on ingredients read as follows: “*The following raw materials must be used in the manufacture of Melton Mowbray Pork Pies.*” These are then listed as: fresh pork, salt, wheat, flour, lard and/or shortening, pork gelatine and/or bonestock, water, spices. There was no restriction on what other optional materials could be used. This wording and list remained unchanged until July 2007.

29. The word ‘only’ was inserted into the specification in the list of raw materials permitted in the manufacture of MMPP at a fairly late stage of the original application following an email exchange between the MMPPA and Defra. The MMPPA raised concerns that the specification was worded in such a way which would not specifically exclude artificial colours, flavours and preservatives and, on 16 July 2007, it wrote to Defra asking to amend the first sentence in the ‘Method of Production’ section of the specification which, at that stage, was still under consideration by the Commission. The MMPPA proposed inserting the word ‘only’ which meant that the amended sentence read as follows: “*The following raw materials only must be used in the manufacture of Melton Mowbray Pork Pies*”. On 5 November 2007 Defra asked the Commission to insert the word, “only” in the MMPP specification being considered. As a result, the wording proposed by the MMPPA was in the summary specification published by the Commission in the

Official Journal in April 2008 for any objections. The summary specification including the word “only” was then confirmed and registered in June 2009.

30. The flaw in the specification was, in fact, picked up in December 2008 but was not rectified before the registration of MMPP. Defra was contacted, that December, by email by the chairman of the MMPPA who stated that the inclusion of the word ‘only’ in the ‘Method of Production’ section would mean that ingredients such as rusk and potato starch could no longer be used. It was suggested that use of those ingredients (as binding agents) was implied in the ‘Method of Production’ section which referred to “filling ingredients” (at step 2). Subsequently, however, to put this beyond doubt, a formal application to amend the specification was sent by the MMPPA to our then delivery agent, Food from Britain, in February 2009.

31. In all the circumstances, Defra concludes that it was not the intention of the MMPPA to prevent the use of optional ingredients and create a closed list by inserting the word ‘only’ into the list of raw materials to be used in the manufacture of MMPP. The MMPPA’s intention was rather to ensure that artificial colours, flavours and preservatives were excluded from the ingredients. Defra is of the view that this error is sufficient justification for amending the specification.

(II) Detrimental effect on the quality of the product

32. No objection has been raised to the inclusion of glazing agents (milk and/or egg) or breadcrumbs and/or rusk. However, Pork Farms object to the optional inclusion of starch as an ingredient for MMPP on the basis that it will have an adverse effect on the quality of the product. If the quality of a product is detrimentally affected, it follows that the reputation of the product will be adversely affected too. However, we do not consider that the inclusion of starch as an optional ingredient will lower the quality of the MMPP for the following reasons:

- The inclusion of starch does not, in itself, mean that a product cannot acquire PGI status. We have taken note of the large number of other PDO and PGI products which also include starch in their lists of ingredients where, it follows that, it is not considered that starch adversely affects the quality of each of those products. In any event, under the proposed amendments, the amount of starch that can be included will be limited (<5%) which will minimise its effect on the final product. The inclusion of starch in the list of raw materials will not affect the minimum meat content of the MMPP (which will remain at 30%).
- Whilst there will always be a subjective element to determining the extent to which any product has quality characteristics it is not unreasonable to assume that it is those ingredients that make up the larger proportion of the finished product which will have the most influence on the character of the MMPP.
- We have noted the different views of the MMPPA and Pork Farms regarding retailer and consumer attitudes to boil-out. The former states

that it is unattractive to the consumer while the latter argues that it is something consumers associate with a traditional MMPP. Neither the MMPPA nor Pork Farms has produced evidence of consumer research to support its position. Our view is that this is also a subjective element and, as such, producers should be able to decide whether they want to minimise the risk of boil-out or not in order to meet the demands of their customers.

33. We believe that it is important to stress that the inclusion of starch (and milk and/or egg glaze and breadcrumbs and/or rusk) is optional. The inclusion of starch in the list of ingredients in the product specification does not mean that its use will be compulsory. Indeed, it might be argued that those choosing not to use starch (or any of the other optional ingredients) in their MMPP might wish to make a virtue of the fact in order to differentiate their MMPP from those made by other producers.

CONCLUSION

34. Defra concludes that the application to amend the PGI specification for MMPP is justified and satisfies the requirements of Regulation 510/2006. Defra will forward the relevant documents to the Commission for a final decision, the next stage in the application process.

Yours sincerely

Simon Johnson

Simon Johnson

Food Compositions and Standards Team

Food Policy Unit

AMENDMENT TO THE PGI SPECIFICATION FOR MELTON MOWBRAY PORK PIE

LIST OF ANNEXES

ANNEX 1 Chronology

ANNEX 2 Summary of key documents relating to the amendment
application

ANNEX 1

Chronology

- 15 Dec 1999** MMPPA submit application to then MAFF to protect the name 'MMPP' as a PGI. In 'Raw Materials' section of the form the following ingredients are listed:
- Mandatory materials: fresh pork, wheatflour, water, lard and/or shortening, salt, pork gelatine and/or pork, bonestock, spices. The following optional materials may also be used to meet customer specifications, binding agents, glazing agents, flavour enhancers, pastry relaxants.*
- 6 Nov 2002** Defra consult on MMPPA application. Wording on ingredients reads as follows: "*The following raw materials must be used in the manufacture of Melton Mowbray Pork Pies.*" These are then listed as: fresh pork, salt, wheat, flour, lard and/or shortening, pork gelatine and/or bonestock, water, spices.
- 10 Jul 2007** MMPPA write to Defra (copied to Pork Farms) raising its concern that the specification is worded in such a way as to not exclude certain ingredients e.g. monosodium glutamate. Defra replies referring to the other wording in specification that makes it clear that "*pies must be free from artificial colours, flavours and preservatives*" and that the absence of such ingredients differentiates the MMPP from other similar pies.
- 16 Jul 2007** Email from the MMPPA to Defra:
"for the avoidance of doubt would be grateful if you could amend slightly the wording for the ingredients to add the word 'only' in section e) Method of Production
The following raw materials only must be used in the manufacture of Melton Mowbray Pork Pies"
- 5 Nov 2007** Email from Defra to the Commission to ask it to amend the specification (to reflect the wording requested by the MMPPA) in advance of publication in the Official Journal.
- 4 April 2008** Commission publish summary specification in Official Journal.
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2008:085:0017:0020:EN:PDF>
- 16 Dec 2008** Email from Chairman of MMPPA making an informal enquiry about a possible request to amend the specification: '*...The inclusion of the word 'only' in the list of ingredients meant that rusk and potato starch as well as egg glaze could no longer be*

used even though their presence is implied in the instructions for production where the use of fillers is included.'

- 5 February 2009** Initial application from MMPPA to amend the specification sent to Food from Britain, Defra's then delivery agent.
- 1 March 2009** ADAS take on the role of Defra's delivery agent for the Protected Food Names scheme.
- 30 June 2009** Publication in Official Journal of Commission Regulation 566/2009 registering MMPP as a PGI.
- 21 Sept 2009** Email from Pork Farms to Defra saying it understands that there may have been some minor amendments to the PGI document and asks for sight of those. Defra replies to say that ADAS is considering a request to amend the specification and asks ADAS to send details.
- 29 Sept 2009** Meeting between Irene Bocchetta (ADAS) and Matthew O'Callaghan (Chairman of MMPPA) to discuss the amendment application.
- 11 Jan 2010** Completed application to amend the MMPP specification emailed to ADAS from the MMPPA
- 10 Feb 2010** Letter from Pork Farms Ltd to ADAS objecting to proposed amendments to PGI specification.
- 16 Mar 2010** ADAS launch 12 week formal consultation on the MMPPA's application to amend PGI specification.
- 20 May 2010** Pork Farms email ADAS to confirm Pork Farms still wish to rely on its original objection to the use of starch in the manufacture of Melton Mowbray Pork Pies.
- 8 June 2010** Closing date for consultation. No objections other than those of Pork Farms.
- 9 June 2010** ADAS write to MMPPA setting out Pork Farms' objections.
- 15 Jul 2010** Response from MMPPA to ADAS addressing Pork Farms' objections.
- 23 Aug 2010** Defra visit to Pork Farms factory in Nottingham. Issue of proposed amendment is raised but no detailed discussion takes place.
- 7 Oct 2010** Response from Pork Farms to ADAS addressing points made in letter of 15 July from MMPPA.

- 6 Dec 2010** Meeting between Defra and Pork Farms at Defra to allow Pork Farms an opportunity to set out its reasons for its objection and to provide additional information.
- 9 Dec 2010** Defra meeting with MMPPA at Samworth Brothers' Charnwood Bakery, Leicester to allow the MMPPA an opportunity to set out its reasons in support of its amendment application and to provide additional information.
- 27 June 2011** Email from Pork Farms stating that all of MMPP are *'now fully compliant with PGI legislation with the exception of the egg glaze which was an obvious and glaring error in the initial process.'*
- 17 November 2011** Defra decision

ANNEX 2

Summary of the key documents relating to the amendment application

- Copy of the original application from the MMPPA dated 15 December 1999. Not available electronically. A hard copy of this will be sent with the hard copy of the decision letter.
- Published Summary Specification for Melton Mowbray Pork Pie (OJ C 85, 4.4.2008, P.17)¹⁸
- Application to amend Specification for Melton Mowbray Pork Pie. A copy of this is attached to the Decision Letter.
- Amended Specification for Melton Mowbray Pork Pie prepared by the MMPPA. A copy of this is attached to the Decision Letter.

¹⁸ A copy can be found at:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2008:085:0017:0020:EN:PDF>