Managementul calității

Metrologia în sistemul Mentenanță Productivă Totală
ISO 45001, etapa de Proiect de comitet

Standardul international ISO 45001, care stabilește cerințele pentru sistemul de management al sănătății și securității ocupaționale, a ajuns acum în etapa de Proiect de comitet, fiind dispoibil pentru comentarii, publicarea finală fiind prevăzută pentru anul 2016.

Acest proiect de standard, inspirat de bine-cunoscutul OHSAS 18001, este conceput pentru a ajuta companiile și organizațiile din întreaga lume să asigure sănătatea și siguranța oamenilor care lucrează pentru ele.

David Smith, presedinte al Comitetului de proiect ISO/PC 283, Sisteme de management al sănătății și securității ocupaționale, face primele aprecieri asupra proiectului.

- Diferențele majore dintre OHSAS 18001 și noul ISO 45001

Scopul general al standardului rămâne același și cei familiarizați cu OHSAS 18001 vor recunoaște multe dintre temele noului standard ISO. Există însă unele evoluții interesante, legate de noile reguli privind elaborarea unor standarde internaționale de sistem de management. De exemplu, a-s-a pus un accent mult mai puternic pe "contextul" unei organizații și a fost atribuit un rol mai mare pentru top management și leadership. Astfel, o organizație trebuie să privească dincolo de problemele sale imediate de sănătate și securitate și să ia în considerare ceea ce societatea așteaptă de la ea. Organizatiiile trebuie să se gândească la contractanți și furnizori, precum și la modul în care activitatea lor ar putea afecta mediul înconjurător.

ISO 45001 insistă asupra faptului că aspectele de sănătate și securitate ocupatională trebuie să fie încorporeate în sistemul global de management al organizației, ceea ce necesită o implicare mai mult puternică a top managementului și leadership-ului acestia. Aceasta va fi o schimbare mare pentru utilizatorii care pot delega în prezent responsabilitatea unui manager de securitate.

- OHSAS 18001 este un standard adoptat pe scară largă și are mare success. De ce trebuie dezvoltat un standard ISO?

În primul rând, multe organizații folosesc deja un serial de standarde pentru sistemul de management ISO. Integrarea cerințelor de sănătate și securitate ocupatională se poate face astfel mult mai ușor în al doilea rând, denumirea și recunoașterea ISO vor crește credibilitatea și vor determina adoptarea standardului pe scară mai largă.

- Beneficiile majore ale utilizării acestui standard

Implementarea și punerea corectă în aplicare a unui sistem pentru managementul sănătății și securității ocupaționale, propus de proiectul ISO 45001, ajută organizațiile la reducerea numărului de accidente și îmbolnăviri profesionale, pentru a evita umările penale costisitoare, eventual să reduce costurile de asigurare, precum și pentru crearea unei culturi organizaționale pozitive când angajații constată că nevoiele lor sunt luate în considerare. (Sursa: ISO)
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The European Optional Quality Term “Mountain Product”: Hypothetical Application in the Production Chain of a Traditional Dairy Product

Alessandro BONADONNA*, Giovanni PEIRA**, Erica VARESE***

Abstract

EU Delegated Regulation no. 665/2014 defines the requirements for applying the optional “mountain product” quality term, which was introduced with EU Regulation no. 1151/2012. These requirements are the result of a long process on the part of the European Commission to standardise the different approaches presented by those Member States for whom the term is relevant.

The purpose of this study was to assess the applicability of the provisions of the Regulation to the production chain of cow’s milk and milk products. Specifically, the study was geared to assessing the requirements in relation to a milk product in the Piedmont cheese-making tradition, the “Toma del lait brusc.”

Although restricted to a limited geographical area and to a particular traditional product, the results of the survey provide an initial assessment of the applicability of the instrument. Companies operating in the mountains and those practising transhumance would be able to use the optional term provided they are able to self-produce a substantial portion of their fodder or obtain it locally and can regularly document the diet of their animals. Some of the Regulation’s requirements, however, await derogations and clarifications from the national legislator.

Keywords: mountain product, optional quality term, traditional dairy product, niche production, Toma del lait brusc.

1. Introduction

In a well-known publication (Petrini, 2005), Carlo Petrini sums up the meaning of the term globalisation in the apparently illogical behaviour of Asti farmers. In 1996, while they were reproducing tulip bulbs for fields in the Netherlands, Dutch farmers were exporting to Italy sweet peppers produced, like other vegetables, through hydroponics. More generally, this mechanism was worthy of criticism for its distortive effects. International trade was fuelling the phenomenon of replacing territorial specificities with standardised productions devoid of social, historical and traditional content.

A number of changes have been made to the system since the mid 1990s. On the one hand, the institutions have designed and developed several tools aimed at recovering the traditions and territoriality of food and agricultural products and, on the other, private enterprise has reinterpreted the meaning of the term globalisation.

In the first case, the EU, for example, pursues the objectives of protecting and safeguarding European agro-food production through the creation and application of instruments such as food safety rules, the Common Agricultural Policy, the Rural Development Policy and food quality systems. Sometimes these issues are developed and improved at local level. A few of these include: the establishment of Traditional Agro-foods in Italy (Ministerial Decree 350/99) and attempts to certify them (Varese et al., 2010; Bonadonna et al., 2014) or the recent Romanian legislation dedicated to the certification of traditional products (Decree no. 724 of 29 July 2013 – Ordinul 724/2013).

In the second case, the changes seen in Western consumer societies have led to the global vision adapting to local conditions, a phenomenon known as globalization (Matusitz and Lord, 2013; Mak et al., 2012; Turner, 2003). Some multinationals operating in the agro-food sector have redefined strategies and operational plans to adapt them to local specificities and expectations (Martinelli et al., 2011). The strategy taken in Italy in recent years by a well-known global restaurant chain is one example of this. Trade agreements with consortia safeguarding Italian PDO and PGI terms for the supply of ingredients and Qualivita certification for restaurant service, the 100% Italian burger first and with meat from two native Italian breeds later, demonstrate the need to link gastronomical offerings to the local territory. This means that place and local are not only fundamental to the creation of Alternative Food Networks (AFN) (Ikerd, 2011; Nonini, 2013; Dansero and Puttilli, 2014) but can also be considered adaptive (and in some cases essential) elements for operators of the global food system. The local approach in this case cannot be seen as a form of protectionism towards a concept of globalised trade, but rather, if anything, a useful comparison tool for identifying a path towards an equilibrium in an imperfect system (DuPuis and Goodman, 2005).

Different classifications define food quality emphasising these changes and, whether directly or indirectly, highlighting the importance of the place of origin of a food product: agronomic quality (Percivale et al., 1996; Cappelletti et al., 2008), traditional quality (Manfredini, 2010) and production context (Peri, 2006) demonstrate that these aspects should be in the product to meet consumer expectations.

Western consumers associate product origin with tradition (Vanhonacker et al., 2010) and actually acknowledges its value, requiring the term through the implementation of labelling (Bernues et al. 2003) (Banterle and Stranieri, 2008) and certifi-

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1 This paper is one of the results of the project “Ipotesi di sistema certificativo per la tutela e la promozione di produzioni agroalimentari delle aree montane: definizione e stesura delle linee guida di orientamento in un area modello piemontese (Hypothesis of certification system for the protection and promotion of agricultural food production in mountain areas: definition and drafting of guidelines for guidance in an area model Piedmontese)” coordinated by Alessandro Bonadonna. The present paper is the result of full and equal cooperation among all the authors.

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cution systems (Van Ittersum et al., 2007) that ensure transpa-

In search of further guarantees, Western consumers have also
developed a high affinity for farmers’ market and local and
regional foods, in order to regain awareness of the origin of
products and to defend themselves from the homogenisation of
the agro-food products of their local territory.

The benefits of a more widespread use of these instruments
are immeasurable. They make it possible to differentiate and
characterise local products from similar standardised products;
they enable the growth and development of local business
networks, the preservation of traditions and the protection of
local cultural heritage (Tregear et al., 1998); they are based on
the direct and simple relationship between producers and
consumers (Belliveau, 2005); they promote the visibility of local
products in public spaces; they educate consumers to the limi-
tations and the potential of local food (Brown and Miller, 2008);
they encourage the creation of initiatives and are a defence
against product homogenisation (Schnell, 2011); they support
local production and small producers and safeguard work within
fragile rural communities (Sgroi et al., 2014). Although it is
customary to see them as an advantage, the issue of the possible
benefits to be gained in environmental terms is actually con-
troversial (Foster et al., 2006; Saunders and Barber, 2008; Coley
et al., 2009; Cholette, 2011; Forssell and Lankoski, in press).

In the EU, sensitivity towards a territory and its agro-food pro-
duction is based on the Mediterranean approach of Latin Countries
of which it has been said in the past (Bonadonna et al., 2013): it
highlights the importance of combining nature-related factors
(climate, water, soil) and human factors (culture, tradition, me-
thod) in a particular “place”, which allows food and agriculture
production to acquire characteristics and specificities that are
unrepeatable in analogous standardised productions and, by
stating their origin, to enhance their reputation.

In addition to renewing established tools such as certification
schemes dedicated to the Protected Geographical Indication
(PGI), the Protected Designation of Origin (PDO) and the Tradi-
tional Specialities Guaranteed (TSG) (Gragnani, 2013; Tosato,
2013), the European Union’s recent food and agriculture policy
emphasises that the agricultural sector can even be sustained
through implementation of initiatives that favour geographical
areas with specific geomorphological conditions.

EU Regulation no. 1151/2012 (“Quality Package”) further
outlines the concept of origin as an element for the quality
assessment of agro-food products and emphasises the im-
portance of the relationship between food and territory. This ob-
jective is highlighted by a willingness in Europe to establish and
define several optional quality terms inspired by the local territory.

As stated in the text of the legislation (article 29, paragraph
1), “optional quality terms” have a European dimension and
must relate to a characteristic of one or more categories of pro-
ducts, or to a farming or processing attribute which applies in
specific areas; their use term adds value to the product as com-
pared to products of a similar type.

The main objective of these instruments consists, on the one
hand, in facilitating the transfer of information between the
producer and the consumer with regard to the particular charac-
teristics and/or properties of the product, and, on the other hand,
in highlighting the importance of supporting the income and the
creation of wealth in less-favoured communities. In this regard,
the Regulation provides for the set-up of two optional quality
terms: mountain product and product of island farming.

2. Optional quality term “mountain product”

Referring to the first term, after several months of work (OJEU,
2010), evaluations (Santini et al., 2013) and substantial changes
from the original ideas (e.g. not introducing labelling systems
consistent with the regulations on animal welfare and environ-
menta 100

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m ountain farmers and producers to define new trade strategies
to promote output.

In order to reduce the possibility of confusion in consumers
comparing the mountain origin of products, Legislators have
stressed the need to establish more relevant application criteria
for the optional quality term (e.g. production methods,
procurement of raw materials and semi-finished products from
non-mountain areas) as well as any derogations for the use of
the term mountain product.

For the definition of mountain areas, considered to be among
the least-favoured areas in the European Union, the article refers
to EC Regulation no. 1257/1999. They are characterised by a
reduction in the potential use of land and an increase in labour
costs than in flatland areas. These elements may be due to se-
veral factors:

a) altitude makes weather conditions particularly difficult, with
a consequent reduction in the growing season;
b) steep slopes prevent the use of machinery or require spe-
cial and expensive tools even at lower altitudes;
c) a combination of the above factors.

In light of such considerations, the quality package esta-
blishes mountain product as a new optional quality term dedica-
ted to product categories for human consumption that meet two
specific conditions in their production chain and process:

a) both raw materials and farm animal feedstuffs come pri-
marily from mountain areas;
b) the transformation of the food product is carried out in a
mountain area (for processed products only).

These provisions were interpreted by the European Commission
and translated into EU Delegated Regulation no. 665/2014
which, in fact, identifies the necessary requirements for use of
the term mountain product. The text provides precise indications
on the length of time animals must stay in the mountain environ-
ment and the origins of their feed, and also provides derogations
for processing operations. According to the current guidelines,
the indications contained in this Regulation should lead to the crea-
tion of a labelling system.

3. Purpose

The purpose of this work is to assess the applicability of the
provisions of EU Commission Delegated Regulation No. 665/2014
in the production chain of cow’s milk and milk products.

It was decided to limit the study to a traditional Piedmont
dairy product and the companies that produce it. The ensuing
search led to the selection of “Toma del lait brusc” as the subject
of investigation, since historically it was made only in mountain
areas, but is now produced in flatland areas. This cheese was
included in the National List of Traditional Agro-Food Products
(PAT) and is one of the products selected by Piedmont Region
(Bonadonna et al. 2013) to define the guidelines for implemen-
ting a regional quality certification system (Varese et al. 2010).

3.1. Requirements of EU Commission
Delegated Regulation no. 665/2014

The Regulation states that the term “mountain product” can
be applied to products made from cattle farms in mountain areas
provided that

a) these products are supplied from animals reared for at
least the last two thirds of their life in those mountain areas, if
the products are processed in such areas;
b) or, by way of derogation, products made from transhumant
animals that have been reared for at least one quarter of their life
in transhumance pastures in mountain areas.

With regard to raw materials, the Regulation also states that
feedstuffs for farm animals can be considered to come essentially
from mountain areas if “the proportion of the animal animal
diet that cannot be produced in mountain areas, expressed as a
percentage of dry matter, (...) does not exceed 40%”.

With regard to the processing of milk and milk products,
the text states that such activities may also be performed outside
of mountain areas, in processing facilities in place on 3 January

1
For the production of the cheese, we conducted interviews using a simplified questionnaire, consisting of a section asking about the company and the production of Toma and another section dealing with the company owner’s perceptions of the optional quality term “mountain product”. This was because no animal rearing activities are involved in this part of the business. The questionnaires used the PAPI (Paper and Pen Interview) system completed by an interviewer (in person and by telephone). Below are the results of the interviews carried out at the farms. The questions for the dairy are separate (except for information about the production of Toma processed together with other association members) and are found at the end of the paragraph.

5. Results

5.1. Company Information

According to their answers, Toma producers are mainly located in mountain areas (10 out of 12 companies): 6 practise transhumance in the summer (including the two companies based in flatland areas) in pastures in Susa Valley (5) and Val Chisone (1) (Table 1); the remaining farms rear and pasture their animals around their own land. In addition to cows for cheese production, 5 farms also sell non-pasteurized fresh milk directly on the farm and another 5 also rear goats; 2 farms sell some of their milk to other companies for processing.

<table>
<thead>
<tr>
<th>Company</th>
<th>Municipality</th>
<th>Territory</th>
<th>Pasture</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Pianezza</td>
<td>Flatland</td>
<td>Cesana Torinese (Lago Nero)</td>
</tr>
<tr>
<td>2</td>
<td>Verolengo</td>
<td>Flatland</td>
<td>Cesana Torinese (Alpe Brusà del Plan)</td>
</tr>
<tr>
<td>3</td>
<td>Giaveno</td>
<td>Mountain</td>
<td>Giaveno</td>
</tr>
<tr>
<td>4</td>
<td>Venaus</td>
<td>Mountain</td>
<td>Mompanterro</td>
</tr>
<tr>
<td>5</td>
<td>Giaveno</td>
<td>Mountain</td>
<td>Pragelato</td>
</tr>
<tr>
<td>6</td>
<td>Bruzolo</td>
<td>Mountain</td>
<td>Chianocco</td>
</tr>
<tr>
<td>7</td>
<td>Lanzo Torinese</td>
<td>Mountain</td>
<td>Lanzo Torinese</td>
</tr>
<tr>
<td>8</td>
<td>Giaveno</td>
<td>Mountain</td>
<td>Giaveno</td>
</tr>
<tr>
<td>9</td>
<td>Giaveno</td>
<td>Mountain</td>
<td>Giaveno</td>
</tr>
<tr>
<td>10</td>
<td>Corio</td>
<td>Mountain</td>
<td>Corio</td>
</tr>
<tr>
<td>11</td>
<td>Villarocchiardo</td>
<td>Mountain</td>
<td>Cesana Torinese (Desertes)</td>
</tr>
</tbody>
</table>

For the production of the cheese, we conducted interviews using a simplified questionnaire, consisting of a section asking about the company and the production of Toma and another section dealing with the company owner’s perceptions of the optional quality term “mountain product”. This was because no animal rearing activities are involved in this part of the business. The questionnaires used the PAPI (Paper and Pen Interview) system completed by an interviewer (in person and by telephone).

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5.2. Toma del lait brus: production period and quantities

For most of the respondents, the production period covers the entire year (7); 3 companies use the warmest months in variable periods (4 to 7 months) in line with tradition; 1 company excludes the summer period (production from October to April).

The average number of forms of Toma made in the last year (2013) by the dairy, which will be discussed later, was approximately 2,700. The average weight declared is 4.5 kilograms/form. The total quantity produced is around 12 tonnes and the total consumption value is estimated at around 150,000 Euros.

5.3. Requirements of EU Commission Delegated Regulation no. 665/2014

As seen in Table 1, the sample can be divided into three different types of farming: companies located in mountain areas practising transhumance in the summer, companies located in mountain areas that do not practise transhumance and companies based in flatland area which pasture during the summer.

The restriction of where breeding should take place can be met by all the companies in the study. According to the information provided, the 10 companies based in mountain areas should have no difficulty reaching the requirement for the last 2/3 of life because the animals spend their entire production life in these areas. The 2 companies based in flatland areas, on the other hand, pasture for around 4 months in the mountain, enabling them to meet the restriction for transhumant animals to spend at least a quarter of their lives in mountain areas. For compliance purposes, the document mentioned by most respondents is Model 7 (6 companies). However, the rest of the sample still have doubts and did not indicate alternatives.

According to the respondents, the requirement for feedstuffs, regarded “essentially from mountain areas” if the proportion of the annual animal diet that cannot be produced in mountain areas, expressed as a percentage of dry matter, does not exceed 40 % (…) in the case of ruminants”, has been reached throughout the sample: 10 companies based in mountain areas meet this percentage by a minimum of 65% of self-produced feedstuffs and/or sourced locally up to a maximum of 100%; 2 companies based in flatland areas declare 95% solely for the period pasture (Table 2).

The remaining feedstuffs given to animals are sourced from agricultural cooperatives (3 companies), farmers’ cooperatives (2) and private feed companies (1). None of the respondents was able to state the actual origin of these products.

To ensure compliance with this requirement, the only documentary instrument mentioned by respondents is the Quaderno di Campagna (4 companies); in this case, most of the sample indicated no instrument (7).

Table 2. Number of farms and percentage of feed sourced locally

<table>
<thead>
<tr>
<th>No. companies</th>
<th>1</th>
<th>3*</th>
<th>3</th>
<th>2</th>
<th>1</th>
</tr>
</thead>
<tbody>
<tr>
<td>% feed</td>
<td>100</td>
<td>95</td>
<td>90</td>
<td>80</td>
<td>70</td>
</tr>
</tbody>
</table>

*no. 2 pasture period only

5.4. Optional “mountain product” quality term

Before the final part of the questionnaire, on the basis of the answers already given, the respondents were given a brief presentation of the labelling system proposed by the European Union and the relative requirements. This resulted in a number of observations which can be summed up as follows: although a significant portion of the sample (7 companies) did not know about the European initiative before the questionnaire, 9 out of 11 companies believe that these provisions could be easily met by farms operating in mountain areas, whether or not they practise transhumance. However, some respondents said that implementation of such a system should not increase costs, both in strictly economic terms and in terms of time spent, since, by definition, mountain forms are less-advantaged economic entities with low productivity and could do without extra expenses.

In terms of their own businesses, the entire sample thought they would be able to meet the requirements in order to use the wording “mountain product” for the whole of their dairy production, including Toma (the respondents of the two flatland companies emphasised the possibility of using the labelling system for the whole of production attributable to only one period of pasture). Most of the sample (9 out of 11 companies) also believed that this tool might be useful for their business: 5 companies, however, said that integration of the instrument shouldn’t lead to further costs, 4 companies would be prepared to recognise its value of integration, whether self-monitored or controlled by independent third-party organisation, if a certification system were introduced. In the latter case, the additional cost they would be prepared to pay would be 3.5 percent of the value of production.

5.5. Information about cheese factory

In accordance with the provisions of the Regulation, the dairy is currently located in a mountain municipality and has been in business since 2007 (before the limit of 3 January 2013). The core business is transformation of raw cow’s milk into different types of cheese (Toma di Lanzo, small cheeses and flavoured herb cheeses, Toma del lait brus), ricotta and butter.

Before the questionnaire, the owner had never heard of the European labelling system. However, he thinks the instrument could easily be integrated into his business (the company traceability system already keeps milk batches separate and enables them to be closely traced within the company), provided that the farms which supply cow’s milk are able to comply with the requirements of the legislation: About 60% of the milk that is processed in the company comes from local companies based in mountain towns. However, he did not currently know how many could be defined as “from the mountain” and how many producers would be able to document their compliance with the requirements. He also thought that it was too early to give a positive evaluation of the system, since it would be useful to get the impressions of the farms as well as of potential consumers of mountain cheese. However, if the interest of consumers and primary producers were assured, he would have no difficulty bearing the cost of self-monitoring, thanks to the existing traceability system, as well as the cost of further certification with third-party monitoring.

6. Discussion

The work carried out by the European Commission to define the requirements for the optional “mountain product” quality term appears to have achieved its objectives. The survey among Toma producers demonstrates that only those operating in mountain areas and able to obtain feed from the territory concerned are entitled to use the term.

With regards to time spent in the mountain area, the respondents thought they were able fulfil the requirements of the Regulation quite easily: the location of the company headquarters, Model 7 (official document for transfers to mountain pastures) and Model 4 (official document certifying the transport of animals) trace the time spent and routes of each animal, which also ensures that formal requirements are met. In view of this documentation, the requirement is easily verifiable for companies based in mountain areas and for those based in flatland areas.

In terms of feedstuffs, the statement suggests that fulfillment would be easy (only a couple of companies said that 30-35% of dry matter is not sourced from the mountain area), although some limitations are seen in the difficulty of being able to support these declarations an effective document. Some mentioned the Quaderno di Campagna as the instrument which contains information about the type and quantity of agricultural production in a company, but leaves the issue of the origin of feed purchased...
from third parties. Another criticism of the second requirement is
the difficulty calculating the required percentage of dry matter
content.

Interviews with various subjects also highlighted the need to
know the possible costs arising from implementation of the
European Union labelling system. While the first requirement can
be checked by consulting documents already present on farms,
the second requirement might lead to several costs. If the Qua-
derno di Campagna is not sufficient, companies interested in
using the term would have to ensure their feedstuffs come from
mountain areas, in addition to managing a document system to
trace the feed. The proposed certification system, further reduced
producers’ inclination to include the “mountain product” term.

When it comes to the place of processing, there should be no
complications for companies operating in a mountain area which
manage the entire production chain. For companies operating in
flatland areas, much will depend on the interpretation given by
Member States to the derogation for “processing operations”
outside of the “mountain area in question.”

It is also worth noting the comments of the dairy owner, who
mentioned the need to evaluate the interests of mountain farms
in documenting the uniqueness of their mountain milk, and the
desire of potential consumers to buy mountain dairy products.

There are two particular aspects that should be mentioned
about the quantity of toma produced and compliance with the
production specification rules: compared with previous obser-
vations (Bonadonna et al., 2014), there was an increase in
overall production in the 2011-2013 period, both in terms of
weight and the number of forms. At the same time, a number of
dimensional inconsistencies still remain, because, for market
reasons and depending on the availability of raw materials, pro-
ducers do not always comply with the provisions regarding the
weight of the form, heel and/or diameter.

7. Conclusions

In the past, the application of European quality systems has
led to mixed results. While the financial economic results achie-
vied by the quality agro-food sector in several European countries
cannot be improved (Ismea Qualitiva, 2013; Tiberio and Diniz,
2012; Bouamra- Mechmache and Chaaban, 2010), however
these results could be further improved, for example, in terms of
commercial strategies (Arfini e Capelli, 2009), volume (Tiberio
and Diniz, 2012), cost (Tudisca et al., 2014) or structure of the
offering (Antonelli and Viganò, 2014). The same structure of
European quality systems has been criticised. For example, the
European quality system disciplining traditional recipes (TSG)
did not get the expected results, mainly owing to a weak link between
product and territory (Peira, 2014).

However, as far as the “mountain product” is concerned, the
initiative of the European Union is praiseworthy. The creation of
a labelling system for these products should support local
economies and integrate the tangible elements of which they are
made up, more generally as a “territorial brand” (Pencarelli and
Forlani, 2006). For this to happen, draft legislation aimed at
creating quality instruments should be followed and supported by
careful planning of activities on the part of stakeholders, inclu-
ding local authorities, proceeding with the necessary timing and
precautions (Tregar et al., 2007).

If implemented consistently, agro-food products from moun-
tain areas could be enhanced by the initiative. This presupposes
the need to assess the applicability of the requirements to
broader mountain areas and all sectors affected by EU Delegated
Regulation no. 665/2014 and to establish whether or not
consumers are effectively interested.

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