

APPENDIX 3

April 28, 2023

U.S. Food and Drug Administration
Division of Dockets Management
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: Letter in Support of Petition to Amend Orange Juice Standards of Identity- Taxonomy Petition

Dear Commissioner Robert M. Califf:

The undersigned companies represent the largest citrus juice processors in California and account for virtually all of the state's juice supply. As of the 2023 USDA crop estimate, California is now the largest citrus producer in the United States. California tangerines and tangelos this year are estimated by USDA to account for 21 million boxes out of the total U.S. production of 21.5 million boxes. Our companies employ hundreds of people and account for millions of dollars in sales and economic activity for the state of California. Because California mainly grows citrus for the fresh market, the fruit used in processing largely reflects eliminations from fresh channels of trade. Consequently, tangerines and tangelos account for a significant share of the fruit California uses in juice production, as compare to Florida which primarily grows juice oranges.

Tangerine juice, sold as such, accounts for an insignificant share of the juice market. Blending tangerine juice with orange juice can add value for both the consumer, processors and supply chain as it can enhance both color and flavor finished product, particularly in the current supply environment where U.S. citrus production is at an 86 year low. By increasing the percentage of reticulata hybrids in orange juice, economic benefits will accrue with the expanded domestic juice supply. We urge FDA to amend the standards of identity to allow 15% by volume of in orange juice. We also support the other amendments in the attached petition updating taxonomic changes.

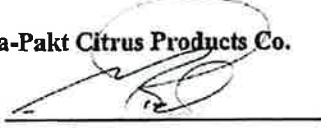
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