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June 8, 2004

Docket Clerk
Market Order Administration Branch
Fruit and Vegetable Programs
Agricultural Marketing Service (AMS)
United States Department of Agriculture
1400 Independence Avenue, SW
STOP 0237
Washington, DC 20250-0237
Email: moab.docketclerk@usda.gov

**RE: Proposed Data Collection, Reporting, and Recordkeeping Requirements
Applicable to Cranberries Not Subject to the Cranberry Marketing Order
Docket No. FV01-926-1 PR**

Dear Sir or Madam:

The Juice Products Association (JPA) is a trade association whose international membership consists of major packers and distributors of a wide variety of fruit and vegetable juices, juice beverages, and drinks. Our members represent a significant majority of the juice and juice beverage processors in the United States. In the notice published in the April 12, 2004, *Federal Register* (69 *Federal Register* 19118), USDA solicits comments regarding the submission of data to the Cranberry Marketing Committee concerning cranberry sales, acquisition and inventory information by those persons engaged in the handling or importation of fresh cranberries or cranberry products not subject to the reporting requirements of the Federal cranberry marketing order. JPA submits the following comments regarding the notice.

According to the notice, "Currently, if a handler regulated under the order has juice, sauce or other finished cranberry products in inventory, the handler is required to determine the barrel equivalency of cranberries contained in those products and report this as inventory." To assist those entities that are currently subject to the cranberry marketing order, those that may become subject to it in the future and those that may become subject to the proposed rule (if it is adopted), we recommend that USDA publish standard factors for converting the barrel equivalency of processed fruit, such as cranberry juice or cranberry juice concentrate into raw fruit. This information would help to ensure that the data being reported is consistent without revealing a company's yield data. JPA proposes the following calculations:

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50 degree Brix Cranberry Concentrate

1.5 gallons 50 degree Brix Cranberry Concentrate = 1 barrel raw cranberries = 100 pounds (lbs) of cranberries

Single-Strength Cranberry Puree or Puree Concentrate

Weight of puree or puree concentrate x 97 percent recovery x (Brix of the product/7.5 Brix) = Weight of Cranberries

Sweetened Dried Cranberries (SDC)

100 pounds (lbs) of SDC = 200 lbs of cranberries = 2 barrels of cranberries

Cranberry Sauce

1 6/#10 case = 0.11 barrels of cranberries
1 24/300 case = 0.073 barrels of cranberries

Sample Conversions

To convert 9,000 lbs of 8 degree Brix single-strength cranberry puree to barrels of cranberries, use the following formula:

$$9,000 \text{ lbs} \times 0.97 \times (8/7.5) = 9,312 \text{ lbs of cranberries} = 93 \text{ barrels of cranberries}$$

To convert 15,000 - 24/300 cases of cranberry sauce to barrels of cranberries, use the following formula:

$$15,000 \text{ cases} \times 0.073 = 1,095 \text{ barrels of cranberries}$$

We appreciate your consideration of these comments.

Sincerely,

Patricia Faison

Patricia Faison
Technical Manager