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AMS Fruit & Vegetable Programs
USDA Stop 0247
1400 Independence Ave., SW
Washington, DC 20250-0247

**SUBJECT: NEW GRADE STANDARD PROPOSED FOR APPLE JUICE FROM
CONCENTRATE**

This letter is written by the Michigan Processing Apple Growers, a grower marketing cooperative representing 750 Michigan apple producers. We are an affiliate company of Michigan Farm Bureau. Our members sell juice apples to processors in Michigan and to processors in other Eastern states such as New York and Pennsylvania.

Apple processors in the entire Eastern half of the U.S. do not generally make concentrated apple juice except for their own use to supplement the brix level of apple juice not made from concentrate.

Apple processors in Michigan and all other Eastern apple producing states, do make apple juice from concentrate, but use foreign produced concentrate or rarely Washington State produced concentrate to make these products.

The majority of the apple juice manufactured in the U.S. is made from foreign apple juice concentrate. Some of this reconstituted juice is sold without apple essence added and/or with synthetic malic acid added to better the taste of the juice. It is questionable whether much of this foreign apple juice made from concentrate even qualifies to be called "apple juice".

The members of our cooperative are **OPPOSED** to the establishment of grade standards for juice made from concentrate for the following reasons:

1. We believe that foreign apple juice will find its way into schools and other institutions, which consequently, will make USDA domestic content rules impossible to enforce. The inclusion of apple juice made from concentrate into USDA purchase programs would eliminate all eastern apple processors

from receiving bids let by USDA. Our apple producers will be negatively impacted if these USDA grade standards for concentrate are implemented.

2. Establishing grade standards for apple juice made from concentrate will give Washington State apple processors a competitive advantage in bidding on USDA orders since all their apple juice is made from reconstituted concentrate with very little value placed on raw product.

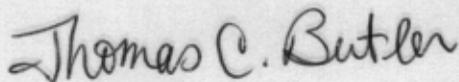
As we see it, no good can be derived from establishing the proposed standards for apple juice made from concentrate.

Your proposed grade standards themselves leave tremendous room for chemistry set manufacturing techniques when you do not demand the restoration of apple essence in Paragraph A, Page 2 of your proposed draft.

Also your proposed standards do not disallow the addition of synthetic malic acid to apple juice in order to produce high-grade sugar acid ratios.

The Michigan Processing Apple Growers respectfully ask the AMS to drop your proposed standards for apple juice from concentrate. Domestic producers will be harmed drastically if you continue with this project.

Sincerely,



Thomas C. Butler
Manager
Michigan Processing Apple Growers