



A processing and marketing cooperative

January 15, 2002

Ms. Lydia E. Berry  
Processed Products Branch  
AMS Fruit & Vegetable Programs  
USDA Stop 0247  
1400 Independence Avenue SW  
Washington, DC 20250-0247

SUBJECT: New Proposed Standards for Grades of Apple Juice from Concentrate

Dear Ms. Berry:

Agrilink Foods is a processor of fruits and vegetables headquartered in Rochester, New York. In reviewing the proposed grade standards for apple juice from concentrate it concerns us as an Eastern US processor that the standards will create an unequal playing field between juice packers. USDA is likely one of the largest if not the largest users of canned apple juice, currently this is fresh pressed product, changing this to re-constituted concentrate will result in loosing this quality advantage.

The second and bigger issue is the requirement for a minimum Brix-Acid ratio of 21:1. The acid level of Eastern grown apples is higher than Western grown apples and the Brix level is lower. It is estimated that 75% of the current Eastern produced juice would fail this requirement. This will ruin the Eastern apple industry!!

Apple production in the US is being seriously challenged by the world oversupply of apples. This has been well recognized by USDA as demonstrated by the significant payments to apple producers the past two years. This change in the juice standards will only increase the economic plight of the apple industry. These proposed standards should not be adopted.

Sincerely,

A handwritten signature in black ink that reads "Tom Facer".

Tom Facer  
Vice President, Agriculture