

GOLDEN SUGAR CORN
SHOEPEG SUGAR CORN
VEG. JUICE COCKTAIL
TOMATO JUICE
TOMATOES

S.E.W. FRIEL

FANCY CANNED FOODS

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S. E. W. FRIEL, JR.
JAMES R. FRIEL, JR.

April 5, 1999

Mr. Harold Machais
United States Department of Agriculture, AMS, FV
Processed Product Branch
Stop 0247
P.O. Box 96456
Washington, DC 20090-6456

Dear Mr. Mchias:

We appreciate your taking the time to come in and give us a demonstration on how the proposed standards are going to work.

However, we have decided that it would still be in our best interest, and in our opinion, the best interest of the Industry, to maintain the old standards. We feel that the time and energy necessary to be put into this change is unnecessary, and it will also reduce the quality levels of the product on the market. I have attached a letter that we have written to our Congressman.

In summary, we feel that the proposed standard will create an unfair business environment for us, due to the fact that we strive to produce a higher quality product than anyone else in the Industry. With the proposed standard, it will cause a more generalized grading system, distinguishing between inferior product, instead of superior product.

We also feel that the energy and time that it would take to change the Industry to the new standards is unnecessary and does not outweigh the benefits that would be gained, especially since we see no benefits being gained. The Industry is used to the standards in their existing form, and they have proven to be very useful over the years. It is hard for us to understand what the actual need is to make such a change.

BRANDS

FRIEL'S LUSCIOUS

OLE WYE

QUEENSTOWN

HUDSON

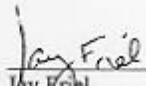
April 5, 1999

We hope that you take our comments to heart, and we look forward to staying with the standards that we currently have.

Thank you for your time. If I may be of further assistance, please contact me.

Yours very truly,

S. E. W. FRIEL



Jay Friel

JRFIII/pjs

cc: Mr. Norman Upton

May 28, 1999



NATIONAL
FOOD
PROCESSORS
ASSOCIATION

Ms. Karen L. Kaufman
Processed Products Branch, FVP, AMS
U.S. Department of Agriculture
STOP 0247
P.O. Box 96456
Washington, D.C. 20090-6456

Re: Notice published on Thursday, March 4, 1999,
Federal Register, Vol. 64, No. 42, pp. 10441-
10442. "United States Standards for Grades of
Canned Whole Kernel (Whole Grain) Corn"

Dear Ms. Kaufman:

The National Food Processors Association (NFPA) is the principal scientific trade association representing the \$430 billion food processing industry. With three laboratory centers, NFPA is the leading authority on food science and safety for the food industry. For more than 90 years, the food industry has relied on NFPA for government and regulatory representation, scientific research, technical services, education, communications, and crisis management.

NFPA has appreciated the opportunity to work through the years with the staff of the Standardization Section of USDA's Processed Products Branch in reviewing and revising as appropriate the United States standards for grades of a variety of canned and frozen fruits and vegetables. Relative to the above-referenced notice, NFPA especially appreciated the opportunity to submit a petition on behalf of the industry requesting a revision of the U.S. grade standards for canned whole kernel corn and the Agricultural Marketing Service's consideration thereof and response thereto.

NFPA herewith supports the declared intent to convert the current standards that are based on cumulative score points to statistically-based individual attributes grade standards, include other varietal types, i.e. supersweet in the standards, replace dual grade nomenclature with single letter designations, and remove the minimum drained weight criteria from the grade standards and relocate them to the grading manual. However, NFPA strongly objects to the use of the term "genetically modified sweet corn" to describe supersweet varieties that are developed by crossbreeding techniques. Furthermore, NFPA supports the comments submitted by the Mid-West Food Processors Association to AMS on March 26, 1999.

Thank you for the opportunity to comment on this significant and important issue. Please do not hesitate to call me at 925/551-4251 if there are any questions or a need for further information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Jantschke', is written over a horizontal line.

Michael Jantschke
Scientist
Center for Technical Assistance

6363 Clark Ave.

Dublin, CA 94568

925 628-2070

WASHINGTON, DC

DUBLIN, CA

SEATTLE, WA

To: Harold Machias Fax (202) 690 - 1527

From: Mid-West Food Processors Association - Technology Committee

Date: March 26, 1999

MWFPA has reviewed the Draft of US Standards for Grades of Canned Whole Kernel Corn. Please review the following:

1. Pg. 4 52.882 (b) "**Genetically modified**" must be removed. Supersweets are developed by crossbreeding, which has nothing to do with genetically modified organisms.
2. Pg. 6 52.884 (e) **Addition: (2) Reasonably well cut - definition needed.**
(e) **renumber Fairly well cut to (3)**
3. Pg. 9 52.844 (q) **tenderness and maturity needs better definitions.**

Good tenderness and maturity -- tender in texture with characteristics typical of the early stage of development of the kernels for the varietal type(s). Supersweets and genetically modified corn may lack Tenderness.

Reasonably good tenderness and maturity -- has reasonably tender texture with characteristics typical of the intermediate stage of development of the kernels for the varietal type(s). Supersweets and genetically modified corn may lack tenderness and may be moderately dry.

Fair to almost tough change to **Fairly tough**

Fairly tough -- has fairly tough texture, but not hard, with characteristics typical of the late stage of development of the kernels for the varietal type(s). Supersweet and genetically modified corn lacks tenderness and is dry.

4. pg. 10 52.885 **add in the CFR definitions.**
5. pg. 11 52.887 (b) (1) (iii) change to "is reasonably well cut"
6. pg. 12 52.887 (c) (1) should be (Table I)
7. pg. 12 52.887 (c) (1) (v) change to **Fairly tough texture for the varietal type.**
8. pg. 12 52.887 (c) (2) should be **Table II and Table III.**
9. pg. 13 52.889 Table I

In grade B please change "Well" to "**Reasonably Well**" in the prerequisite Cut.

In grade C please change "Fair to almost tough" to "**Fairly tough**" in the prerequisite Tenderness and Maturity.

Grading Manual

1. pg. 4 Table I
Recommend using **Grade A drained weight numbers only** or have a very clear definition of the table.
2. pg. 6 B. 1. c.
Insert **Grade B - Reasonably well cut**. Then change number accordingly.
3. pg. 7 d. (1) Conventional Sweet Corn - Tenderness and Maturity - Grade A
Change Tender (milk, early cream) to **Tender (milk)**
Moderately tender (cream stage) to **Moderately Tender (early cream)**
4. pg. 8 (2) Change to read:
Reasonably good tenderness and maturity in (sugar enhanced) and supersweet may lack tenderness and may be moderately dry. Kernels may have a tough pericarp and occasionally are dented. There are two levels of quality within "reasonably good tenderness and maturity:" **Lacks tenderness and Lack tenderness, moderately dry.**

Table should be:

Top	Lacks Tenderness
Bottom	Lack Tenderness, Moderately dry, occasional dented kernels.

Change Reminder to read:
The number of sample units in a lot that are "fairly tough" shall not.....
5. pg. 9 (3) Change to read:
Fairly tough -- has fairly tough texture, but not hard, with characteristics typical of the late stage of development of the kernels for the varietal type(s). **Fairly tough** in conventional sweet corn is dry, chewy corn. Kernels are doughy, may be dented, but are not woody. Pericarp may be tough.

Change to read:
Fairly tough in sugar enhanced and supersweet is dry, chewy corn, with tough to very tough pericarp.
6. pg. 9 e. (1) Change to read:
.....**Good Flavor and odor** in sugar enhanced or supersweet corn is free from objectionable flavors and odors.....
7. pg. 10 Change to read:
When canned whole kernel corn is packed in water but without salt, the salt and sugar balance may be affected. A sample unit that is typically excepted

to contain salt, but does not, may be downgraded if the flavor is neither typical nor off-flavor. Since flavor is a prerequisite, a Grade C sample unit would cause the lot grade to be Grade C. For instructions for certifying off-flavor, see File Code 172-A-1.

8. pg. 10 Use old sizes of smut - $3/16 \times 1/4$ and $3/8 \times 1/4$ No
9. pg. 15 3. Delete the entire paragraph. No
Enter the Lot Grade.....tally sheet.
10. pg. 16 Delete the entire paragraph.
~~The following are separate but equally important requirements that must be followed when using time sampling for frozen cornflower.~~
11. pg. 18 In the table, convert cob to cc to make it consistent with the grade standard.
12. Tally Sheet Add in grade B in the Prerequisite for Cut
Cut (A, B, C)