TCX
TEXAS CITRUS EXCHANGE

July 30, 2002

Ms. Karen L. Kaufman
Standardization Section, Processed Products Branch
Agricultural Marketing Service - U.S. Department of Agriculture
1400 Independence Avenue SW., Room 0709
South Building, Stop 0247
Washington D.C. 20250

Texas Citrus Exchange
702 East Expressway 83
Mission, Texas 78572

Ref. [Docket Number : FV-02-336]

Dear Ms. Kaufman :

On behalf of the citrus growers of the Lower Rio Grande Valley of Texas I strongly object to the measure being propossed by the Indian River Citrus League regarding the USDA Standards for Grades of Grapefruit Juice. These propossed changes will effectively place 60 % of the grapefruit juice that we produce into the lower grade(s) category on ratio alone.

Our grapefruit juice ratio starts the season off at 9.0 and winds up at 18.0 (sometimes at 20.0). Our overall average ratio for the 2000/2001 season was at 12.1 and the average ratio for 2001/2002 season was 13.3. Florida on the other hand starts their season up at at a much lower ratio than ours and so when their juice is at 9 to 11 ratio range the juice is at its peak in all of its quality attributes. The quality of the Texas juice however just starts to reach consistently good quality at 10.5 ratio, peaking at about 12.5 and starting its decline at 14 ratio.

These differences in ratio are a direct result of soil, climate and growing conditions unique to this part of the world. These conditions not only affect the acid levels but also affect the naturally occuring brix level which contributes to the flavor of our juice making it milder and sweeter. Our brix ranges from a low of 9.0 to a high of 12.5 plus, another factor which if taken into consideration would also place a good portion of our output into the lower grade category.

The citrus growers of Texas would definitely not benefit from these propossed changes and for that reason we strongly oppose this petition.

Sincerely

Manuel Ochoa
QA Manager

Texas Citrus Grower Cooperative
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