



APR 26 2002

2002 MAY -1 11:00

Mr. John Ernster  
Chairman of the Board  
Excelpro Manufacturing Corporation  
3760 East 26 Street  
Los Angeles, California 90023

Dear Mr. Ernster:

This is in response to your letter that you sent to the Food and Drug Administration requesting information regarding your product called "E-Pro-PDC." We regret the delay in our response.

You stated that Excelpro manufactures hydrolyzed proteins and dehydrated vegetable broths that have been used in the canned tuna industry since 1979. Excelpro has recently introduced a new vegetable broth called E-Pro-PDC that it wants to use in canned tuna. In a telephone conversation on March 14, 2002, you stated that Excelpro manufactures the dehydrated vegetable broth and sells it to a tuna manufacturer that uses the broth as an ingredient in its tuna.

You specifically asked whether this particular vegetable broth is permitted as an optional flavoring ingredient in canned tuna as provided in 21 CFR 161.190 (a)(6)(v). You stated in your letter that the product is a blend of dehydrated extractives from the following vegetables: peas, celery, onion, garlic, parsley, green bell pepper, red bell pepper, and spinach.

Extractives of the vegetables in your product are those permitted in vegetable broth that can be used in canned tuna. Therefore, if your product, once rehydrated, is made and added to the tuna in the amount provided for in 21 CFR 161.190 (a)(6)(v), it conforms to the standard of identity for canned tuna in 21 CFR 161.190.

Should you have additional questions, do not hesitate to contact us.

Sincerely yours,

Loretta A. Carey  
Consumer Safety Officer  
Division of Standards  
and Labeling Regulations  
Office of Nutritional Products, Labeling,  
and Dietary Supplements  
Center for Food Safety  
and Applied Nutrition

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Mr. John Creeden III  
Consumer Safety Officer  
Office of Seafood  
Policy Guidance Branch  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C St. SW  
Washington DC 20204

Dear Mr. Creeden,

Our company are the technical sales representatives for the Excelpro line of hydrolyzed proteins and dehydrated vegetable broths that have been utilized in the canned tuna industry since about 1979. We are one of the three major producers of these types of products and sell both domestically and on a global basis.

Many of our "offshore" customers export their canned tuna to the United States and they therefore look to FDA for guidance on regulatory issues. We have historically approached the Agency whenever there has been a question with regard to a specific product's compliance with the CFR's.

Excelpro has recently introduced a new vegetable broth called E-Pro-PDC. A specification sheet for this product is enclosed. Since several global markets no longer permit the presence of GMO based ingredients, this broth is made without soybeans. The manufacturing process involves boiling a vegetable slurry in water followed by a filtration and spray-drying step. The dried powder is than reconstituted in water by the canneries prior to addition to the can. No hydrolyzing agents, additives, or processing aids are added other than what is listed in the enclosed ingredient statement.

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**WESCOTEK, INC.**

We have been asked by several potential customers to request confirmation from the agency that this product complies with (21 CFR 161.190) and are permitted as an optional flavoring ingredient in canned tuna. Thank you for your guidance on this issue and I look forward to receiving your response.

Best regards,

A handwritten signature in black ink, appearing to read 'D.A. Andersen', with a long horizontal flourish extending to the right.

WESCOTEK INC.

David A. Andersen

Cc: John Ernster/Excelpro

**EXCELPRO MANUFACTURING CORP.**  
3760 East 26th Street  
Los Angeles, CA 90023  
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**SPECIFICATION SHEET**

**E-PRO-PDC-B  
DEHYDRATED VEGETABLE BROTH**

April 11, 2000

**PRODUCT**

E-PRO-PDC-B is a blend of dehydrated vegetable extractives. This product was developed as a flavor enhancer for canned tuna and functions by reducing the shrinkage of the fish during retorting. The result is more fish juices are retained in the fish flesh giving a better tasting end product. The product contains no soybean or other GMO ingredients. This may be of particular interest to those countries where the use of GMO ingredients is an issue.

**UTILIZATION IN CANNED TUNA**

E-PRO-PDC-B should be pre-solubilized in warm water at a concentration between 12 and 15%. The product should then be heated to 145-170 F under moderate agitation to solubilize the product. A sufficient quantity of the broth should be added to water packed cans to achieve a usage level between 1.8 grams and 2.2 grams of E-PRO-PDC per can. On oil pack product we recommend a slightly lower usage level which should not exceed a range of 1.6-2.0 grams per six ounce can.

On oil pack products, the E-PRO-PDC-B solution should be added prior to the addition of the oil phase. On solid pack product it is important that the cans are rolled a minimum distance after the seaming step to provide for proper penetration of the E-PRO-PDC-B solution

**INGREDIENT STATEMENT**

Vegetable Broth (peas, celery, onion, garlic, parsley, green bell pepper, red bell pepper, and spinach).

For canned tuna sold in the United States, the ingredient statement does not need to list the component ingredients of the vegetable broth. We suggest that manufacturers review the label requirements in their end markets for guidance in determining the proper designation in other countries.

### TYPICAL ANALYSIS

FAT	3.0%
PROTEIN (as is)	24.0%
CARBOHYDRATE	60.0%
MINERAL & ASH	5.0%
FIBER	2.0%
MOISTURE	6.0%

### TYPICAL MICROBIOLOGICAL

Standard Plate Count	Max. 10,000/g
Coliform	Less than 10/g
Yeast & Mold	Less than 10/g
E. Coli	0/g
Salmonella/400 gr.	Negative

### PACKAGING

E-Pro-PDC-B is packed 50 pounds (22.5 kg) per bag in a multi-walled paper bag with sealed plastic inner liner. The product is packaged and sealed to protect the contents under normal conditions of handling, shipment and storage. The packaging materials conform to all applicable United States food regulations. The package label indicates Product Name, Name and Address of the Manufacturer, Net weight of contents, and Identification Code.

### KOSHER APPROVALS

E-PRO-PDC-B is certified Kosher under KOF-K Orthodox Rabbinical Supervision.

### SHIPPING

Excelpro product is normally shipped on pallets in 40 foot containers ( 44,000 pounds=880 bags). The product is also shipped floor stacked in 20 foot containers (33,000 pounds= 660 bags). Smaller LTL shipments are available upon request.