



Florida Department of Agriculture and Consumer Services  
CHARLES H. BRONSON, Commissioner  
The Capitol • Tallahassee, FL 32399-0800

Please Respond to:

Division of Food Safety  
3125 Conner Boulevard,  
Suite AD@ - MS-C18  
Tallahassee, FL 32399-1650

November 5, 2002

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Rm. 1061  
Rockville, MD 20852

Subject: Juice HACCP Hazards and Controls Guidance

Dear Docket Management:

The Florida Department of Agriculture and Consumer Services (FDACS), Division of Food Safety commends the Food and Drug Administration's efforts in the publishing of the draft guidance document "Juice HACCP Hazards and Controls Guidance, First Edition." The effort and research that went into this document is evident from the quality of the material presented. The Florida Department of Agriculture and Consumer Services, Division of Food Safety respectfully submits the following comments and suggestions on the draft guidance document:

- For user friendliness, organize the materials in a similar format to the "Fish & Fisheries Products Hazards & Control Guidance Document. Inspection staff is familiar with using that document for their regulatory inspections. Utilizing a similar format would produce harmonization amongst the FDA HACCP documents since the Juice HACCP Training Curriculum is similar to the National Seafood HACCP Alliance Training Curriculum.
- Devise the Table of Contents with corresponding page numbers of subject matter.
- Expand the discussion regarding critical limits, control strategies, monitoring mechanisms, corrective actions, and verification. This would be helpful for both the regulatory and industry use of this document.
- Designate the pasteurization step in the Not-from-Concentrate Pasteurized Orange Juice example page 73 as a CCP.
- Provide an example of a vegetable and a blended juice to expand the scope of effected products as inclusion of the HACCP Plan examples are excellent.

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The Florida Department of Agriculture and Consumer Services appreciates the opportunity to comment on this document and applauds the effort that was put forth in providing useful guidance for industry for compliance with the Juice HACCP Regulation.

Sincerely,

**CHARLES H. BRONSON**  
**COMMISSIONER OF AGRICULTURE**

A handwritten signature in cursive script, appearing to read "Marion Fuller".

Marion Fuller, DVM  
Director, Division of Food Safety

MHF

cc: Dr. Martha Roberts  
Dr. John Fruin