



1872 '00 AUG -7 19:43

July 26, 2000

DOCKETS MANAGEMENT BRANCH (HFA-305)
Food and Drug Administration, Room 1061
5650 Fishers Lane
Rockville, MD 20852

REFERENCE: Docket No. 00N-1351

For the past fourteen years I have represented Juice Tree of Westminister, California in the Northwest. Juice Tree is the world leader in the manufacturer of commercial juicers used by retailers who prepare fresh juice on site for sale.

I am certain your department is aware of the problems encountered over the past few years with off-site juice processors, claiming to be fresh squeezed juice, especially here in the Northwest. Originally it was the Odwalla juices out of California that caused the Ecoli outbreak and more recently the Salmonella outbreak which was traced to Sun Orchards of Arizona. 100% of the problems in the past have been off-site juicing, not individual on-site juice operations.

The reaction to these outbreaks has been devastating to the on-site retail operations. Regulations concerning the labeling and or notification of juice prepared on-site are now being required. New technologies such as flash pasteurization have been introduced and other new methods. Even if these processed juices are safe and meet FDA safety requirements, the public should not be under the assumption it is fresh squeezed. These off-site juices are blended or altered in various methods and then shipped hundreds of miles to the retail stores. The original qualities of the juice has been altered or impaired.

The On-site retail juicing operations have always been the safest method of preparing fresh squeezed juices. The customer can generally see the juice being prepared and knows the content of the juice. They are willing to pay a premium price for the "On-site Juices". Our company slogan has always been - "Just squeezed is the only fresh".

It is our contention that the new Alternative Technologies in processing juices should not have the right to label their juices "Fresh or Fresh Squeezed" when in fact they have been PROCESSED in some manner. The consumer should not be deceived by the term "fresh or fresh squeezed". We consider the terms "fresh or fresh squeezed" to be juices made from quality fruit, squeezed on-site and sold within a very limited time period.

00N-1351

C7

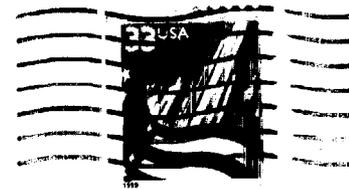
Please keep me informed as to your progress in the proposed FDA ruling on these new processed technologies.

Sincerely,
Juice Marketing Northwest, Inc.

A handwritten signature in cursive script that reads "Ed Fountain". The signature is written in black ink and is positioned below the typed name.

Ed Fountain,
President

JUICE MARKETING NORTHWEST
PMB #180
13520 100TH AVENUE NE SUITE 90
KIRKLAND, WA 98034-5210



DOCKETS MANAGEMENT BRANCH (HFA-305)
Food and Drug Administration , Room 1061
5650 Fishers Lane
Rockville, MD 20852

Reference: Docket NO. 00N-1351

20852/3333

