

Citrus Systems
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FMC FoodTech

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

Ladies and Gentlemen,

I am writing to comment on the Juice HACCP Hazards and Controls Guidance First Edition published for comments on September 12, 2002. Specifically my comments relate to section 1.32 of the draft proposal regarding metal fragments.

FMC Technologies (FMCTI) has been in the business of designing, manufacturing and providing citrus juice extraction machines and technology to the citrus processing industry worldwide for 54 years. The FMCTI Citrus Juice Extractor is used in virtually all countries where citrus juice is extracted. The machine is even used commercially in countries where citrus fruits are not grown (e.g., United Kingdom). FMC Technologies' engineers and scientists have carefully designed the Citrus Juice Extractor to prevent any foreign material from entering the juice stream. In operation, the FMCTI Citrus Juice Extractor cuts two small one inch holes in the fruit through which the juice is removed. The juice then enters and is strained through a strainer tube that contains holes anywhere from 0.025 inches in diameter to 0.090 inches in diameter. Some tubes made for the recovery of citrus pulp contain elongated slots.

Worldwide, a majority of citrus juice processors use the FMCTI Citrus Juice Extractor. None of FMCTI's customers have ever notified FMCTI of metal fragments getting into the juice as a result of the extraction process and FMCTI personnel have never observed any metal fragments entering the juice stream having originated during the extraction cycle of the process.

FMCTI does not believe that it is necessary to include the juice extraction step as a potential hazard from metal fragments. Wear of metal parts or metal fatigue has never been identified as a potential hazard from the FMCTI Citrus Juice Extractor. FMCTI believes that inclusion of such a hazard potential in a citrus juice HACCP plan only serves to divert attention from other areas of citrus processing where foreign materials may enter the juice stream and does not increase assurance of preventing metal fragments from gaining entry into the juice stream.

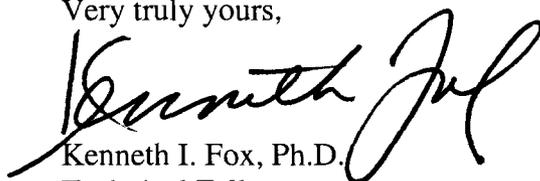
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Please consider these comments in the final rule making.

If you need any more information, please do not hesitate to either e:mail – kenneth.fox@fmcti.com or call me at (863)680-3634.

Very truly yours,



Kenneth I. Fox, Ph.D.
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