



October 30, 2025

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

Submitted electronically via regulations.gov

Re: Food Standards of Identity Modernization; Pasteurized Orange Juice; Proposed Rule; Docket No. FDA-2022-P-1668

Dear Sir or Madam,

Thank you for the opportunity to comment on the Food and Drug Administration's Proposed Rule modifying the Standard of Identity (SOI) for Pasteurized Orange Juice (POJ). As the food industry association, FMI works with and on behalf of the entire industry to advance a safer, healthier, and more efficient consumer food supply chain. FMI brings together a wide range of members across the value chain — from retailers that sell to consumers, to producers and manufacturers that supply food and other products, as well as the wide variety of companies providing critical services — to amplify the collective work of the industry. More information about our organization is available at www.FMI.org.

FMI commends FDA for recognizing the need to modernize the SOI for pasteurized orange juice to better reflect the current supply of U.S. oranges and the realities of growers and manufacturers. Due to the spread of "citrus greening disease" and severe weather events that have impacted the production of oranges in the United States and internationally, among other factors, it has been increasingly difficult for manufacturers to meet the current SOI's standard of 10.5° Brix. The proposed amendment to the SOI permitting lower fruit sugar content in POJ would alleviate some of those logistical challenges and allow manufacturers to procure more domestically sourced orange juice. Further, the modest modification would have minimal impacts on taste, flavor, and consumer acceptance of POJ and could preserve, or even increase, consumer choice within the category. We respectfully encourage the agency to finalize the proposed rule in a timely manner, so that both manufacturers and consumers may begin to benefit from its provisions.

We also encourage the agency to increase the allowable percentage of *Citrus reticulata* or *Citrus reticulata* hybrids from 10% to 15% in the following standards:

- Pasteurized orange juice (21 CFR 146.140)
- Canned orange juice (21 CFR 146.141)





- Frozen concentrated orange juice (21 CFR 146.146)
- Orange juice for manufacturing (21 CFR 146.151)

The increase in *C. reticulata* will provide flexibility to industry to deliver better tasting orange juice as the supply of oranges continues to be decimated by citrus greening and environmental factors globally. We also encourage the agency to provide documented enforcement discretion allowing *C. reticulata* to be used at an increased level of 15% in POJ while continuing to expedite the issuance of the final rule.

FMI greatly appreciates FDA's efforts to reduce unnecessary burdens on the food industry and reevaluate when regulations are no longer serving the American consumer. We look forward to continued dialogue and collaboration with the agency and would be pleased to provide further information to support said efforts.

Sincerely,

A handwritten signature in black ink that reads 'Erin McCarthy'.

Erin McCarthy
Manager, Government Relations & Regulatory Affairs

A handwritten signature in black ink that reads 'Hilary S. Thesmar'.

Hilary S. Thesmar, PhD, RD
Chief Science Officer

