



FLORIDA FARM BUREAU FEDERATION

THE VOICE OF AGRICULTURE

October 22, 2025

The Honorable Martin Makary, MD, MPH
Commissioner of Food and Drugs
U.S. Food and Drug Administration
10903 New Hampshire Ave
Silver Spring, MD 20993

Docket ID Number: FDA-2022-P-0016

RE: Food Standards of Identity Modernization; Pasteurized Orange Juice;
Proposed Rule

Dear Commissioner Makary:

The Florida Farm Bureau Federation (FFBF) appreciates the opportunity to submit comments supporting the Food and Drug Administration's (FDA) proposal to amend the standard of identity (SOI) for pasteurized orange juice (POJ) by lowering the minimum orange juice soluble solids content from 10.5° to 10° Brix (FDA-2022-P-0016).

FFBF is a grassroots organization representing over 132,000 member families, many of whom are citrus producers. Florida's citrus industry has suffered staggering losses since Huanglongbing (HLB) was first detected in 2005. HLB ("citrus greening") is a vascular disease, endemic to Florida, vectored by the Asian citrus psyllid (ACP) and can kill a tree within two years.

Citrus greening deteriorates a citrus tree's root system which adversely affects the infected tree's ability to uptake nutrients. Due to an infected tree's weakened root system, coupled with extreme weather events (i.e., Hurricanes Charley, Wilma, Irma, Ian, Milton, etc.), citrus trees are commonly exhibiting premature fruit drop, lower Brix content, sparse canopy, reduced fruit production, and other negative effects.

As these factors have resulted in a lower soluble solids content in the oranges, Florida's citrus growers have begun blending their juice with imported juice, primarily from Brazil and Mexico, to meet the outdated SOI for POJ. When the federal SOI was set in the 1960s, Florida oranges averaged 11.8° Brix. Conversely, by the 2022-2023 season, Florida oranges averaged 9.7° Brix.

While the opportunity to lower the soluble solids content of POJ from 10.5° to 10° Brix, is not a fix-all, it allows domestic growers in the juice sector to be more competitive without sacrificing the taste or quality of the product. Additionally,



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we encourage FDA to consider that there are other orange juice products than just POJ that are subjected to this outdated regulation (i.e., orange juice from concentrate). We respectfully ask FDA to consider lowering the SOI for all orange juice products that are subject to the 10.5° Brix minimum.

FFBF's annually member-ratified policies support the lowering of the soluble solids content in POJ and other orange juice products. When evaluating the proposed amendment to the SOI for POJ, we urge you to consider that Florida citrus growers are at a critical time and need access to every tool available to maintain profitability. This position reflects the needs of the Florida citrus industry.

Thank you for your consideration.

Sincerely,

Jeb S. Smith
President
Florida Farm Bureau Federation