



August 12, 2005

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Mr. David L. Priester  
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Standardization Section  
Fresh Products Branch  
Fruit & Vegetable Programs  
Agricultural Marketing Service  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Room 1661 South Building, Stop 0240  
Washington, DC 20250-0240

Dear Mr. Priester:

**Re: United States Standards for Grades of Persian (Tahiti) Limes  
Docket #FV-04-309**

The North American Perishable Agricultural Receivers (NAPAR) is a national trade association located in Washington, DC, representing independent produce wholesale receivers. NAPAR members are predominantly small businesses with combined annual sales in excess of \$4 billion. NAPAR formed an operating alliance with the Food Marketing Institute in 1999, enabling it to function independently while expanding the services to its members.

On behalf of our members, I appreciate the opportunity to submit comments to USDA and hope our perspective is helpful in determining how to proceed with a revision to the U.S. Standards for Grades of Persian (Tahiti) Limes. Having surveyed our receiver members on this issue, the overwhelming reaction is that the U.S. Lime grades are overly complex, particularly as they pertain to color and juice content.

**Color**

Our members feel that score-able yellowing should be "fails to grade." They also believe that the U.S. No. 1 "Turning" grade should be eliminated. Limes that fail to meet a the U.S. No.1 grade because of turning yellow due to ripening should not be allowed to slide into that grade under the term "Turning". Limes, however, which fail to meet the grade due to blanching, should continue to be designated as "Mixed Color" within the grade.

The Standards should be limited to the following three grades: U.S. No. 1, U.S. Combination and U.S. No. 2.

While “Yellowing” and “Blanching” describe very different defects in the fruit and each imposes a very different market value on the product, they are not, however, always easy to differentiate from one another on the inspection floor. This is particularly true at night under certain artificial lighting conditions. Misinterpretation of these defects represents a significant problem and should be addressed with better lighting conditions for inspectors.

**Juice Content**

Our members would like to see the juice content of not less than 42%, measured in terms of weight and not volume. The weight of the sample should be measured, the juice squeezed from the sample and calculated as a percentage of the total weight.

Our members believe that the U.S. Standards for Grades of Persian (Tahiti) Limes should be updated and simplified in order to make them more meaningful in the marketplace. We appreciate the opportunity to submit these comments and look forward to working with USDA through the grade-change process.

Please feel free to contact me directly if NAPAR can provide further assistance during this process.

Sincerely,



Patrick A. Davis  
President