



OCT 17 2003

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Mr. Roger Gibb
Senior Vice President of Quality Assurance
Bumble Bee Seafoods, LLC
9655 Granite Ridge Drive, Suite 100
San Diego, California 92123

Re: Docket No. 2003P-0313

Dear Mr. Gibb:

This is in response to your label submission for the product Bumble Bee Chunk Light Tuna "Touch of Lemon." The final label, which will be used for market test purposes under the temporary market permit for "chunk light tuna" that was announced in the Federal Register of August 4, 2003 (68 FR 45827; Docket No. 2003P-0313), has been reviewed and is acceptable for its intended use.

If you have further questions, please do not hesitate to contact us.

Sincerely yours,

Linda McCollum
Food Labeling
and Standards Staff
Office of Nutritional Products, Labeling
and Dietary Supplements

2003P-0313

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Post Office Box 85362
9655 Granite Ridge Drive, Suite 100
San Diego, CA 92123

August 27, 2003

Christine L. Taylor, Ph.D.
Director
Office of Nutritional Products, Labeling and Dietary Supplements
Center for Food Safety and Applied Nutrition
Food and Drug Administration
College Park, MD 20740

Re: Docket No. 2003P-0313

Dear Dr. Taylor:

Thank-you for your letter dated Aug 4, 2003 regarding Bumble Bee's application to the Food and Drug Administration (FDA) for a temporary permit to market test, in interstate commerce, canned tuna that will deviate for the standard of identity for canned tuna (Title 21 Code of Federal Regulations (CFR) 161.190)) in that lemon juice and lemon oil will be used as flavoring ingredients instead of lemon oil and citric acid with safe and suitable carriers. Also, the product will be labeled "in water, with natural lemon flavor" rather than "lemon flavored chunk light tuna." In all other respects, the test product will conform to the standard for canned tuna.

Attached please find the finished label that will be used during distribution of the test product. Each of the ingredients used in the food are declared on the labels are required by the applicable sections of 21 CFR part 101.

Bumble Bee will commence with national interstate shipments, for market testing purposes effective September 1, 2003.

Sincerely,

for Roger Gibb
Senior Vice President of Quality Assurance
Bumble Bee Seafoods, LLC

cc.
Team Leader, Regulations and Review Team
Division of Food Labeling and Standards (HFS-820)
Office of Nutritional Products, Labeling and Dietary Supplements



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Recipe on Back



Tuna with a twist! Each of lemon is premium chunk light tuna with just a touch of lemon juice added for a milder, more delicate flavor. So delicious, you'll be tempted to eat it straight from the can.



PREMIUM TUNA
NET WT 6 OZ (170g)

Nutrition Facts
 Serv. Size 2oz drained (56g - about 1/4 cup)
 Servings about 2.5
 Fat Cal. 5
 Calories 60

Amount/serving	%DV*	Amount/serving	%DV*
Total Fat 0.5g	1%	Total Carb. 0g	0%
Sat Fat 0g	0%	Fiber 0g	0%
Cholest. 30mg	10%	Sugars 0g	0%
Sodium 250mg	10%	Protein 13g	23%
Vitamin A 0% • Vitamin C 0% • Calcium 0% • Iron 2%		Vitamin B-6 0% • Vitamin B-12 20% • Phosphorus 0%	

*Percent Daily Values (DV) are based on a 2,000 calorie diet.

INGREDIENTS: LIGHT TUNA, WATER, VEGETABLE OIL, SALT, LEMON JUICE, NATURAL FLAVOR, BLACK PEPPER, FISH OIL.

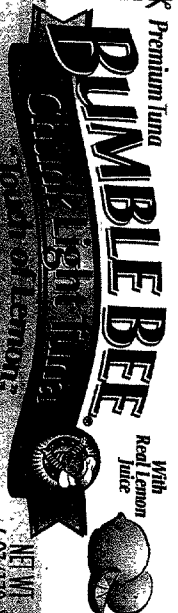
DISTRIBUTED BY:
 C&A
 FOODS
 SAN DIEGO, CA 92166

FOR INQUIRIES CONCERNING PRODUCT INCLUDE NUMBER SHOWN ON CAN END.

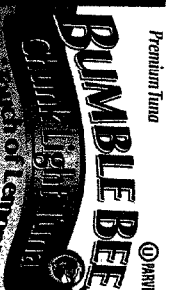


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