



August 19, 2004

Ms. Dorothy Shimer
Research Division
Air Resources Board
P.O. Box 2815
Sacramento, California 95812

Dear Ms. Shimer,

First of all we would like to thank you for the invitation for comments on the Draft Report to the California Legislature on Indoor Air Pollution (Assembly Bill 1173). We are responding to this invitation on behalf of ABECitrus, the Brazilian Association for Citrus Exporters that represents the sector which produces and exports Brazilian frozen concentrate orange juice (FCOJ) and by products, including oils, terpene and d'limonene, the final link in a productive chain which congregates, in the State of Sao Paulo, 98% of Brazil production, 10 processing plants and 29,000 groves.

Citrus sector alone employs about 400,000 people and is the essential economic activity in 320 cities in the State of Sao Paulo and 11 in the State of Minas Gerais, and produces 53% of all FCOJ produced in the world, or 80% of the FCOJ offered on the international market.

We are very concerned about the comments and treatment that this document gives to citrus terpenes and d'limonene.

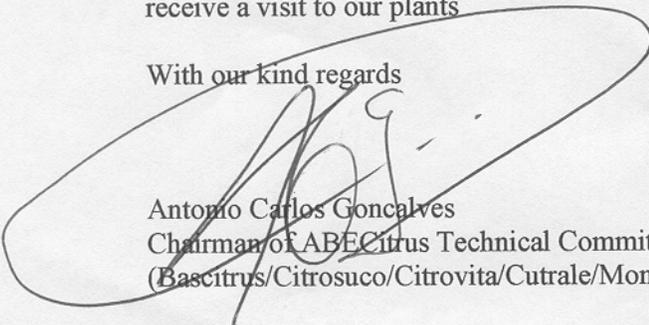
The negative statements on the health effects given to these products are not correct on our point of view. Besides this, these products are tremendously important to the whole citrus industry. We also understand that these products are natural products obtained from a physical extraction from the fruit. d'limonene is GRAS from FDA and is not at the American Toxicology Program list. Citrus terpene has been used over the last 4 decades replacing known toxic chemicals.

Besides the non-technical comments above, we, at the Technical Committee of ABECitrus, would like support a letter sent by the Florida Chemical Company, containing technical comments to this subject. Our Technical Committee has studied this subject already for a long time and has evaluated the report and agrees with the content of the letter that we also attached to this letter.

On behalf of citrus growers and citrus processors from Brazil, we ask the removal of all these misleading and negative statements about citrus terpenes and d'limonene. Considering what was informed above regarding to the citrus industry in Brazil, you can see how devastating the information on this report can be to an enormous amount of people on the citrus business around the world.

We also take this opportunity to say that we are opened to give more information or even receive a visit to our plants

With our kind regards



Antonio Carlos Goncalves
Chairman of ABECitrus Technical Committee
(Bascitrus/Citrosuco/Citrovita/Cutrale/Montecitrus/Louis Dreyfus Citrus/Sucorrico)