



Milne Fruit Products and Juice HACCP Regulation, 21CFR120

page 1 of 2

Date:	December 4, 2025
Juice Product:	All juice and puree concentrates
Location:	Milne Fruit Products, Inc
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President:	Michael Sorenson
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Milne Fruit Products has implemented a Hazard Analysis and Critical Control Point (HACCP) Program both compliant with, and in the spirit of, the 21CFR120 food safety management system regulation. Our manufacturing facilities have applied technical and scientific principles to this common sense approach to keeping our food safe. Utilizing the preventive and systematic approach of the 7 principles of HACCP, it is determined that this process has one CCP. This is for Bulk Transport when shipping tankers to control the potential for intentional adulteration.

The following points were assessed, developed, or enhanced during HACCP Plan development.

- Management is strongly committed to the HACCP Program.
- A solid foundation of pre-requisite programs is the basis to the development and implementation of our HACCP Plan.
- Preliminary HACCP Plan tasks were completed - team assembled, food and distribution were described, the intended use and consumers were described and a general flow diagram was developed and verified.



- A thorough Hazard Analysis (HA) was conducted. A hazard is defined as a biological, chemical, or physical agent that is likely to cause illness or injury in the absence of its control. Hazards were identified and evaluated at each process step of the food operation.
- Sanitation standard operating procedures (SSOP's) have been reviewed to assure conformance.
- As our juice concentrate is a thermally concentrated juice, we are exempt from the requirement to include in the HACCP plan any additional control measures to ensure a 5-log reduction in pathogens. The thermal process provides for this reduction consistent with FDA's *Guidance for Industry: Juice Hazard Analysis Critical Control Point Hazards and Controls Guidance*.
- With respect to our role as a juice supplier, regardless of any heat treatment during manufacture for pathogen control or as an integral processing step, it is incumbent on the purchaser to ensure the thermal (or equivalent 5-log reduction) process is applied to any 100% juice beverage made from our juice ingredients.

A handwritten signature in black ink, appearing to read "Edward W Thomas".

Edward W Thomas
Director, Technical Services