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The Citrus Company of Belize Ltd.
 Belize Food Products Ltd.
 Barton Creek Farms
 Valley Manufacturing Co. Ltd.
 X.Y.Z. (Belize) Ltd.
 Top Juice Ltd.

P.O. Box 25, Dangriga Town
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December 10, 2003

Ms. Jean A. Webb
 Secretary
 Commodity Futures Trading Commission
 Three Lafayette Centre
 1155 21st Street N. W.
 Washington, D. C. 20581
 U. S. A.

By Fax: (202) 418 - 5521

By e-mail: secretary@cftc.gov

Dear Ms. Webb

**RE: PROPOSED CHANGE – FCOJ-A FUTURES AND OPTIONS
 CONTRACT AND FCOJ-B CONTRACT**

We have read the Notice in the Federal Register of Wednesday November 26, 2003 concerning the request from the Citrus Association of the New York Cotton Exchange for the proposed new FCOJ-A futures and options contract and FCOJ-B futures contract.

We note that the product specifications are the same for both FCOJ-A and FCOJ-B futures contracts save and except that only products originating from Florida and/or Brazil will trade as FCOJ-A. All other products will trade as FCOJ-B contracts only, with the FCOJ-B trading as a differential to FCOJ-A contract.

In Belize, our company is the only processor of citrus fruits in the country. We have always produced premium quality concentrate that is often used in blending with other low quality concentrates to improve their quality. Our industry is one of only three major agro-industries that support the Belizean Economy.

We have used the futures market in the past in order to set a floor price for our product to be able to offer relatively stable prices to our growers for their fruit. We note that under the new proposals we will no longer be able to trade using the primary FCOJ-A contract but will instead be only be able to use the FCOJ-B contract. We believe that this move will be detrimental to our industry. It would result in our product being perceived as secondary to those of Florida and Brazil.

COMMENT

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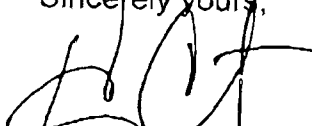
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Secretary
Commodities Futures Trading Commission
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This would in turn affect the prices which we would be able to get for our product, although it will be at least as good as that of Florida and Brazil.

We object to the proposals submitted by the Citrus Association of the New York Cotton Exchange as we are of the considered opinion that it is inherently unfair and would be detrimental to the Belizean Citrus Industry. We are therefore requesting that the Commodity Futures Trading Commission not approve the new proposals.

Thanking you in anticipation of a favourable decision by the Commodity Futures Trading Commission.

Sincerely yours,



Dr. Henry Carlton
Chief Executive Officer