

December 22, 1936.

Mr. W. H. M. Wharton, Chief,
Eastern District,
Food and Drug Administration,
United States Department of Agriculture,
201 Varick Street,
New York City.

Dear Mr. Wharton:

Re: Chicle Development Company.

According to my record the following is
a statement of the pending detentions under the federal
food and drugs act of chicle imported by this company,
as stated by the official notices:

Port No. NY 20113 - Date of October 24, 1935:
132 bags, source Merida, by Steamer Panuco of
October 9, 1935. But the Chicle Development
Company's record indicates that this importa-
tion consisted of 133 bags. They are stored
with the Harborside Warehouse Co., in Jersey City
N.J. The aggregate weight is 20,112 pounds. I
should add that 14 bags from this importation
were originally sent to the American Chicle
Company in Long Island City; which chicle after
grinding and drying was repacked in 18 bags and
returned to the aforesaid warehouse.

Port No. NY 21741 - Date of January 2, 1936:
162 bags, source Merida, by Steamer Agwistar
of December 4, 1935. These bags are stored
with the aforesaid warehouse company. The
aggregate weight is 24,607 pounds.

Port No. NY 22167 - Date of January 22, 1936:
654 bags, source Merida, by Steamer Alsund
of January 7, 1936. These bags are stored
with the aforesaid warehouse company. The
aggregate weight is 98,207 pounds.

Port No. NY 22010 - Date of January 22, 1936:
515 bags, source Merida, by Steamer Cauto of
December 24, 1935. But the company's record
indicates that this importation consisted of
522 bags. They are stored with the Lehigh
Warehouse and Transportation Company at Eliza-

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house, Inc., at Jersey City, N.J. The aggregate weight is 78,129 pounds. I should add that, although the Chicle Development Company received no official notice to this effect, two further chicle importations by the same Steamer Cauto, but from a Cozumel source, were also detained. The first importation consisted of 1,920 bags, weighing 291,248 pounds, which are stored with all three of the aforesaid warehouse companies. The second importation consisted of 811 bags, weighing 124,053 pounds, which are stored with the Lehigh Warehouse and Transportation Company at Elizabeth, N.J. And the Chicle Development Company has considered these three importations by the same steamer as constituting one detention.

It follows that: the number of detentions of chicle imported by the Chicle Development Company is four; the total number of bags of chicle so detained is 4,202; and their total weight is 636,361 pounds.

As I have previously informed you all chicle importations by this company are for the account and benefit of the Beech-Nut Packing Company and the American Chicle Company, respectively. As I have also informed you since the original detention the latter two companies have been actively engaged in developing an effective method of cleaning chicle, adequate to secure the release of this detained chicle and for commercial purposes. And in doing so they have sought the best available scientific information and advice; and they have made an original and comprehensive scientific research with respect to the subject under investigation. This with the result that a chicle cleaning method has been developed, which has proven successful in a long series of repeated practical tests. I will mail you a complete description of this method by separate letter.

Therefore and in behalf of the Chicle Development Company I now apply for formal permission to apply this method to the detained chicle, for cleaning it and securing its release. The plan in mind is to apply this method to the chicle imported by the Steamer Cauto, as the first step. For this is the largest importation in question, consisting of 3,253 bags weighing 493,435 pounds. And according to the following procedure, in brief and general:

First: An adequate sample will be taken. The sample contemplated is two lots, each weighing about 10,000 pounds. If the Administration desires a sample of a different amount, action accordingly will ensue. And this sample

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ment and care to take the most representative sample permitted in the circumstances.

Second: One of the aforesaid sample lots will be removed to the Brooklyn factory of the Beech-Nut Packing Company; and the other to the Long Island City factory of the American Chiclé Company. There each lot will be first subjected to an appropriate analysis by the company holding it; then it will be cleaned by the aforesaid method; thereafter it will be subjected to an appropriate check analysis by such company; and the remaining cleaned chiclé will be held for examination and analysis by the Administration. The Chiclé Development Company gives its assurance that none of this chiclé so removed for cleaning will be commercially used, unless and until the Administration expressly sanctions that.

If the Administration desires another procedure or prescribes procedural conditions this company will act accordingly. In short, the company submits the aforesaid plan for review by the Administration. It has only one idea, which is constructively to collaborate with the Administration for the due solution of the problem presented by these detentions. And I respectfully suggest that you telephone any procedural requirements, in order to save time and for my prompt advice to the company.

Very truly yours,

Charles Wesley Dunn

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