



NORTH AMERICAN OLIVE OIL ASSOCIATION

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December 8, 2004

Chere L. Shorter,
Standardization Section, Processed Products Branch,
Fruit and Vegetable Programs, Agricultural Marketing Service,
U.S. Department of Agriculture
1400 Independence Avenue SW., Room 0709, South Building; STOP 0247,
Washington, DC 20250

Re: Comments On United States Standards for Grades of Olive Oil
[Docket No. FV-04-334]

Dear Ms. Shorter:

The North American Olive Oil Association is pleased to submit comments on the petition filed regarding the United States standards for grades of olive oil. The NAOOA is an association of domestic companies that market olive oil as well as foreign producers of olive oil. From its inception, the NAOOA has been a strong proponent of quality product and has carried out the International Olive Oil Council's quality control program here in the United States. Membership in the NAOOA is contingent upon adherence to the current IOOC standard and the NAOOA filed a petition nearly a dozen years ago requesting the Food and Drug Administration adopt the IOOC standards for olive oil.

Through the NAOOA's efforts, the olive oil industry has voluntarily followed the IOOC standards for olive oil for many years, adopting updates to the standard as they've happened. Through this quality control program, the NAOOA randomly collects samples of olive oils marketed by members and non-members from around the country and has it tested against the IOOC standard. Our tests results show that consumers can be confident what they buy in supermarkets is correctly labeled.

Having said that, the lack of an up-to-date standard creates the opportunity for unscrupulous companies to produce or sell inferior product. While some of those submitting comments on this petition have chosen to make it sound as though only imported product can benefit from an outdated standard, the lack of a meaningful standard offers the same opportunity for domestic producers.

Given the NAOOA's ongoing industry education regarding the IOOC standard and its similar petition that was never acted upon by FDA, we support the updating of the current U.S. standards to match the current IOOC standard.

In its cover note accompanying the petition, the California Olive Oil Council mentions it has deleted any reference to a value for linolenic acid, pending the results of a review of the correct fatty acid limits for linolenic acid. The NAOOA would support the exclusion of a reference to linolenic acid, provided the standard would be updated immediately upon completion of the study.

With regard to the organoleptic testing requirements, in order to ensure integrity, we would request USDA create a panel of USDA employees that would be certified by the IOOC to perform organoleptic analyses.

For the chemical testing, we request USDA create a lab or accredit one or more labs that would perform the analyses following IOOC technical standards. It would be necessary in both chemical and organoleptic testing to use coded samples as opposed to product labeled with brand names to avoid any claims of bias.

We appreciate the opportunity to provide comments and stand ready to assist in any way we can.

Sincerely,

Bob Bauer
President