December 1, 2004

Ms. Chere L. Shorter
AMS Fruit and Vegetable Program
U.S.D.A. stop 0247
Washington D.C. 20250-0247

Re: New Olive Oil Standards

Dear Chere:

My wife and I own an olive oil mill and olive orchards Santa Ynez California. We make olive oil for ourselves and for others and market our olive oil widely. Our mill is the most modern in the United States and makes phenomenally high quality oil (ie. acidity levels consistently below .3%). We also have a small lab in which we can test for acidity and peroxides. Our oil and all of the oil we make for others consistently meet the standards of the COOC quite easily. When we test many foreign oils, they fail to meet the standard, even though they are labeled as extra virgin olive oil.

When we market our oil, retailers regularly ask if we can meet the prices of various oils which we know are of a low quality level and do not meet the standards of the COOC. Worse yet, I have been asked repeatedly if we can meet the price of an oil, labeled "extra virgin olive oil", which has been chemically tested and proved to have a substantial amount of canola oil in it. The retailers do not understand that there is a difference because the lower quality oils are labeled, "extra virgin olive oil". The retailers assume that there must be some regulation that allows them to put this on their label and thus all extra virgin olive oils must be comparable. The result of many conversations on this topic has made it evident to me that consumers, not surprisingly, are even less informed than retailers.

The olive oil industry, the retail grocery industry, and the consumer all need standards established so that all olive oil can be given a meaningful grade and everyone knows what they are being sold. This is not the case currently and is why standards are so badly needed. If you or anyone involved with the new standards have any questions, I would be pleased to spend as much time discussing the issue as is desired.

Sincerely,

Shawn Addison
Figueroa Farms