

Shorter, Chere

From: john@nationalfoodscorp.com%inter2 [john@nationalfoodscorp.com] on behalf of john@nationalfoodscorp.com
Sent: Wednesday, December 08, 2004 7:22 PM
To: Shorter, Chere
Cc: bill@nationalfoodscorp.com%inter2
Subject: Protecting legitimate sellers of Olive Oil and the US consumer against adulterated Olive Oil / Olive Oil [Docket No. FV-04-334] /

Dear Ms. Shorter:

National Food Trading Corporation is pleased to submit comments on the petition filed regarding the United States standards for grades of olive oil. National Food Trading Corporation is a member of the North American Olive Oil Association, which has since its inception required its members to follow the International Olive Oil Council standard.

We sell in excess of 15 million dollars worth of bulk Olive Oil as an ingredient to the major Food Companies in the United States, such as Heinz, Unilever, Conagra, Nestle, General Mills, etc. Unfortunately, we have not been able to tap into the high volume foodservice market because of the high degree of adulteration that is present in that segment of the market. We refuse to compromise our ethics by selling Olive Oil blended with cheaper seed oils and declaring the product olive oil. We feel we are being penalized because of the lack of regulation and an updated standard of identity for Olive Oil in the United States. The US consumer and the reputable companies selling authentic Olive Oil are losing out!! Under the IOOC specifications adulteration is detectable.

Though the NAOOA's testing results show consumers can be confident what they buy in supermarkets is correctly labeled, the lack of an up-to-date standard creates the opportunity for unscrupulous companies to produce or sell inferior product. We support updating the standard to eliminate that opportunity.

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. We support the exclusion of a reference to linolenic acid, provided the standard will 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 urge you to make the necessary changes so the US specification on Olive Oil coincides with the IOOC specifications. We need your support!!

Sincerely,

John C. LiDestri

12/10/2004

Please note my new cell phone number: 201-240-2440

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