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To whom it may concern,

I understand that the Oregon legislature is considering legislation related to unlicensed, direct-to-consumer sales of low-risk baked goods.

I am an Assistant Professor of Food Safety Systems in the Department of Food Science and Technology at Oregon State University. My research focuses on food microbiology, specifically food safety.

I have been asked to provide my scientific opinion about potential food safety hazards associated with the baked goods that could be sold under the proposed legislation.

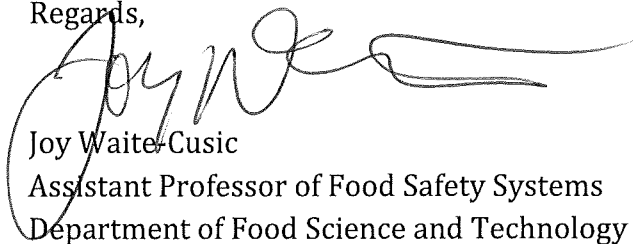
The baked goods on this list are low hazard, i.e., unlikely to cause foodborne illness, because they have low water activity (<0.85). They typically do not support bacterial growth. These foods will spoil (mold, become rancid, dry out) and become unpalatable, but they do not cause foodborne illness. Many states already allow the sale of these products under cottage food laws similar to that being proposed.

Baked goods that are higher risk and have been linked to foodborne illness are those with custard or cream fillings, which therefore need proper refrigeration. These baked goods are specifically prohibited under the proposed law.

Also, concerns about baked goods may stem from Hepatitis A outbreaks in the last couple of decades, but these all were caused by poor worker hygiene, not by the foods themselves. Hygiene can be addressed by requiring those who operate under this law to obtain a food handler's license.

In summary, foodborne illness is not an issue with these foods as long as proper hygienic practices are followed, as is important for all food preparation.

Regards,

A handwritten signature in black ink, appearing to read 'Joy Waite-Cusic'. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Joy Waite-Cusic  
Assistant Professor of Food Safety Systems  
Department of Food Science and Technology