

April 25, 2019  
House Committee on Agriculture and Land Use  
**RE: SB390 - Relating to the sale of olive oil**

Chair Clem and members of the committee,

My name is David Lawrence, co-owner of a small farm near Amity, Oregon; being the actual farmer and olive oil mill operator of our venture.

I am requesting your support and advancement of SB390, a fix of the Farm Direct Marketing Law (FDML) adding olive oil to the list of approved farm products.

First, I'd like to note that while detractors of the FDML warned that the law would cause outbreaks of foodborne illness, a recent OSU study found that this has not been the case:

"We found no foodborne illness linked to FDML products."  
[View of Farm Direct at Five Years: An Early Assessment of Oregon's Farm-focused Cottage Food Law](#)

Olive oil is considered a very food safe product. A 2011 meta-study (study of studies) by University of California - Davis found:

"No outbreaks of foodborne illness linked to olive oil have been reported."  
<https://olivecenter.ucdavis.edu/media/files/microbialsafety120511.pdf>

Olive oil is considered a healthy food product, with studies showing the health benefits of olive oil, especially in relation to cardiovascular disease:

"Olive oil consumption, specifically the extra-virgin variety, is associated with reduced risks of cardiovascular disease and mortality in individuals at high cardiovascular risk."  
[Olive oil intake and risk of cardiovascular disease and mortality in the PREDIMED Study](#)

When I was growing up, we used olive oil topically applied to burns, as an aide in healing.

A recent study validates this folk wisdom:  
[\(PDF\) The Benefits of Olive Oil Compounds in Healing Burned Skin Lesions](#)

Today, facing the onset of heart disease and being really overweight, it has been recommended that I:

"replace the type of fat that you usually cook with — or spread on or pour over food — with olive oil"

[Olive oil: What are the health benefits? - Mayo Clinic](#)

There is a very active and widespread interest in our olive oil products. Some of the varieties we grow and mill are not commercially grown anywhere else in the United States.

There are commercial intent olive trees in Oregon that have been in the ground at least since 2007. We have many such trees in our grove, as well as more younger trees coming into production.



Aug 12, 2018: Expanding our olive grove with new to Oregon cultivars

As olive trees have in essence never before been grown in Oregon, our business model was to buy and plant as many cultivars as possible, and let Oregon weather and farming conditions sort them out. Of the 75 or 80 different cultivars we trialed, most commonly by planting 5 trees per cultivar, 58 cultivars have survived (so far!).

Our business plan is built on this diversity; in 2018 for the first time we were able to mill 15 different single varietal runs of olive oil.



High quality single varietal olive oils are the hardest to make (blends are made by blending complimentary cultivars). This fits very well into a small startup marketing plan of distinguishing ourselves in the marketplace, providing an opportunity for a skilled and talented miller to make a premium product. Unfortunately, given that and the small number of trees we have of each cultivar, our lot sizes are below the minimum required by licensed commercial mills, thus we own our own mill, and are exactly the sort of operation the Farm Direct Marketing Bill is meant to help. Except, of course, currently olive oil is not on the approved product list, which problem SB390 is intended to fix.

We are also following the successful marketing tactic of an "estate wine": an estate wine is made entirely from grapes owned by the winery, with all growing and harvesting decisions controlled by the winery, and the wine is made entirely on the winery's property—it doesn't ever leave the property during crushing, fermentation, aging, or bottling.

### [Requirements to Be an Estate Wine | LoveToKnow](#)

To make the very best and highest value olive oil, I feel we must similarly have control of all operations involved and their timing (growing, milling, specific gravity separation based filtering, hand bottling). With the small lots we are capable of making, we simply don't have enough product to become a commercial facility or amortize our costs to rent a commercial kitchen for the latter two. Both gravity separation and bottling are simple operations for our hand crafted approach: a simple matter of pouring the olive oil from one container to another while leaving any dregs behind.

For the last two years, the olive trees have yielded so well, that we have been forced to let olives rot: as there is not much of a point to make more product we can't sell.



Dec 23, 2018: Frantoio olives that ended up rotting in the field

There are small fully modern two phase centrifugal olive mills available to small farmers, we have had ours since 2010, which produce premium extra virgin olive oil as good as any olive mill can produce. In fact, all our samples submitted for chemical tests say our oil is good enough to meet the proposed "Ultra Virgin" olive oil specification, which is "Beyond Extra Virgin". These machine are almost self contained, ours only needs olives, 220V power, and a gallon or so of warm water to make a batch of olive oil; and uses no chemicals, not even for cleaning. They have been instrumental in start-up olive oil production in new districts in Australia and especially New Zealand.



Our small, fully modern 2 phase centrifuge based olive mill. Two gallon and five gallon buckets shown for scale.



Nov 14: Empeltre olives, direct from the field to the olive mill hopper: here in Oregon the rains provide a very clean input!

Thank you for your time and consideration in moving SB390 forward; I would be happy to answer any questions you have.

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