



ORGANIC FARMING RESEARCH FOUNDATION

Fostering the improvement and widespread adoption of organic farming.

May 10, 2016

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Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20852

Docket No. FDA-2014-N-1207
Submitted electronically via www.regulations.gov

RE: Use of the Term “Natural” in the Labeling of Human Food Products;
Requests for Information and Comments

On behalf of the Organic Farming Research Foundation (OFRF), we submit the following comments to the Food and Drug Administration (FDA) on the use of the term “natural” in the labeling of human food products. OFRF appreciates the opportunity to submit comments on this issue.

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OFRF is a national public-interest organization founded in 1990 to foster the improvement and widespread adoption of organic farming systems. OFRF works to meet the information needs of a growing community of organic farmers and to educate the public and policy decision-makers about organic farming issues.

EXECUTIVE DIRECTOR

Brise Tencer

Labeling has become more critical as consumers take a greater interest in the production of their food, and the contents of the products they purchase. Consumer confidence is based on the transparency of all aspects of the food chain. Unfortunately, use of the term “natural” is poorly defined and confusing to the American consumer.

In a survey published in December 2015, Consumer Reports found that most consumers believe “natural” and organic are largely synonymous. At least 60 percent of respondents thought the term “natural” on packaged and processed food meant the food was produced without pesticides, artificial materials or chemicals, artificial ingredients or colors, or GMOs. The survey also determined that consumers want stringent standards for “natural” labels on meat, poultry, and processed foods.



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Unlike “natural”, use of the word “organic” on food labels is strongly regulated by the United States Department of Agriculture (USDA) under the Organic

Food Production Act (OFPA) and verified by third parties. The clear regulation of “organic” stands in stark contrast to the use of the term “natural”.

There are already a number of misleading and unverifiable terms in the marketplace for consumers to decipher, such as “fresh,” “local,” “natural” and “sustainable”. In the interest of reducing consumer confusion over labeling on food products and protecting the integrity of the term “organic”, OFRF opposes the use of “natural” on food labels.

If the FDA defined “natural” in the strictest and most transparent sense, it would then resemble “organic”, which is a redundancy and unnecessary. To date, neither the FDA nor the food companies have provided a justification for the use of “natural” in food labeling. Given the lack of a strong rationale, it only makes sense to reduce consumer confusion by eliminating the use of this claim on human food products.

We also believe that FDA should encourage the use of labels that are easily understood and meaningful. For example, FDA should encourage the use of specific terms on processed foods such as “no artificial colors, ingredients or flavors” and “non-GMO” that have clear and easily understood meanings.

OFRF is committed to working with the FDA to represent the needs of the organic research community and organic farmers. The issues we raise in our comments reflect our communication and work with the broader organic community. We are committed to maintaining the highest standards for use of the term “organic” and supporting the public’s desire for transparency and a clear understanding of the contents of their food.

Sincerely,

Brise Tencer

OFRF Executive Director

Jane E. Shey

Policy Associate



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