INTERNATIONAL
FOOD INFORMATION
COUNCIL FOUNDATION

May 10, 2016

Division of Dockets Management
HFA-305
U.S. Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852
*Submitted electronically and via U.S. Mail*

**Re: Docket No. FDA-2014-N-1207 for "Use of the Term "Natural" in the Labeling of Human Food Products; Request for Information and Comments**."

Dear Madam or Sir,

The International Food Information Council (IFIC) Foundation appreciates the opportunity to submit public comments on the "use of the term 'natural' in the labeling of human food products" as requested by the U.S. Food and Drug Administration (FDA) (http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm456090.htm#comment).

The IFIC Foundation (www.foodinsight.org) is a §501(c)(3) nonprofit educational organization with a mission to effectively communicate science-based information about health, nutrition, and food safety for the public good.

One of the objectives at the IFIC Foundation is understanding public perceptions by conducting consumer research. The Foundation has been exploring Americans' attitudes toward nutrition and health for three decades with our signature research project being the annual *Food and Health Survey* for the past eleven years. It is the belief of the Foundation that consumer research is a critical first step in determining Americans' understanding of nutrition information and examining how consumer knowledge, perceptions, and attitudes may impact behavior.

The IFIC Foundation's *Food and Health Survey* is an online survey of 1000 Americans ages 18 to 80, weighted to ensure the results are reflective of the American population as seen in the

1100 Connecticut Avenue, NW
Suite 430
Washington, DC 20036, USA

P: (202) 296-6540
F: (202) 296-6547

www.foodinsight.org
twitter: @foodinsight
www.facebook.com/foodinsight

2015 Current Population Survey. Specifically, the results are weighed by age, education, gender, race/ethnicity, and regions. The *Survey* is conducted by an external research firm.

Since the beginning of the *Survey*, we have explored what information consumers generally look at on the food and beverage package when deciding to purchase a food or beverage. Consistently, a majority of consumers (70%) look at the expiration date while the Nutrition Fact Panel, ingredient list, and brand name are viewed by approximately five of ten consumers.

In 2013, the IFIC Foundation started exploring purchasing behaviors more in-depth, asking consumers the regularity they buy foods based on how they are advertised on the label. Approximately four of ten consumers report purchasing foods advertised as "**natura**l" (35-40% range for four years), followed by 30% reporting purchasing decisions based on "no added hormones or steroids", "organic," or "locally".

In the 2013-2015 *Surveys*, women, younger (18-34) individuals, or those in better health were more likely to consider "**natural**" when making purchasing decisions. However, in the *2016 Food and Health Survey* (www.foodinsight.org/2016-FHS)(our most recent *Survey)*, there are no significant groups identified, indicating "**natural**" is a consideration viewed across the spectrum of the population. Approximately 40 percent of respondents do not consider any of the additional "labels" on a regular basis when purchasing food.

## Response to Question Raised by the U.S. FDA:

**Q1: Should we define, through rule making, the term "natural?" Why or why not?**

**IFIC Foundation Response:** With the widespread appeal of the term, the IFIC Foundation explored consumer understanding of the term "natural" in the *2016 Food and Health Survey* through an open-ended question asking: "what does the term 'natural' mean to you when applied to food?" The answers span from *"***what's not in the food***"* to "**production methods**" to "**level of processing**," denoting the lack of clarity of the term. The majority of responses, however, can be categorized into three main areas: no preservatives or additives; natural ingredients/straight from nature/whole foods; or no artificial ingredients or flavors.

Twenty-nine percent (29%) of consumers identified "natural" as simply stating **"no preservatives or additives."** Other comments included:

- "not any artificial chemicals added to the food to enhance shell life or taste"
- "nothing added"

Approximately nineteen percent (19%) of consumers listed comments that focused on "**natural ingredients/straight from nature/whole foods"**:

- "Taken straight from the source" – no chemicals whatsoever have been used on it
- Not necessarily organic –just simple foods mostly plant based, "not from a box with 1000 ingredients," "something that is grown from our earth"
- Farm fresh-fruits, vegetables, meats

- "Right from the ground" – "little to no processing"

Seventeen percent (17%) indicated a "natural" food contains "no artificial ingredients or flavors." Specific comments included:

- "No man-made ingredients"
- "It [natural] should mean no artificial ingredients"

Eleven percent (11%) indicated "natural" means no processing, "in its original or raw form," or "from the ground." Responses indicating "natural" means "not altered or enhanced," "organic," "no GMOs," fresh or locally grown were reported by approximately 5% percent of the respondents. Interestingly, six percent (6%) of the respondents reported that the term "natural" means "nothing – it's too vague for me," "nothing in particular given lack of regulation," "nothing," or "natural is irrelevant and usually is synonymous with expensive without adding any nutritional or flavor value."

**IFIC Foundation Recommendations:**

With the wide variant of responses to describing the term "natural" by consumers, it is evident that consumers are confused and uncertain of what they are buying when purchasing a food labeled "natural." In order to bring clarity and truth in advertising to the general public, it is apparent the term "natural" does need to be standardized. Transparency and truth in advertising are factors that enhance consumer trust in the government and food manufacturers. Clarity in labeling and terminology on products through standardization of terms like "natural" is a place to start.

We trust that the above results from our consumer research will aid the U.S. FDA in its efforts. We would be happy to provide additional details if helpful.

Sincerely,

Kimberly Reed
President, IFIC Foundation

Marianne Smith Edge, MS, RD, LD, FADA, FAND
Senior Advisor, IFIC Foundation

Elizabeth Sanders, MPH, RDN
Associate Director, Nutrition and Food Safety, IFIC Foundation