



May 6, 2016

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

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

Dear Sir or Madam:

The American Society for Nutrition (ASN) appreciates the opportunity to comment on “Use of the Term “Natural” in the Labeling of Human Food Products.” ASN brings together the world’s top researchers to advance the knowledge and application of nutrition. ASN has more than 5,000 members working in academia, public health, clinical practice, industry, and government who conduct research to help all individuals live healthier lives.

Due to current misunderstanding and potential misuse of the term “natural”, ASN thinks that any determination regarding use of the term “natural” needs to be thoroughly informed by consumer studies that determine consumer understanding and translation of the term “natural”. Despite varying interpretations of the term “natural” from the FDA<sup>1</sup> and U.S. Department of Agriculture (USDA)<sup>2</sup>, ASN notes that consumer understanding of the term “natural” does not appear to match either of the current, official interpretations of the term. A 2015 Consumer Reports survey<sup>3</sup> found that many Americans (out of more than 1,000 surveyed) associate use of the term “natural” on processed and packaged food labels to mean no pesticides (63%), no artificial materials or chemicals (62%), no artificial ingredients or colors (61%), and no genetically modified organisms (GMOs) (60%). Even greater percentages of Americans feel that the use of the term “natural” on a label *should* mean these things.

A 2015 Organic and Natural Health Association-commissioned study<sup>4</sup> found that 1/3 of Americans (out of more than 1,000 surveyed) believe there is no difference between organic and natural products. For

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<sup>1</sup> U.S. Food and Drug Administration. (March 4, 2016). FDA Basics – What is the Meaning of Natural? Retrieved from: <http://www.fda.gov/aboutfda/transparency/basics/ucm214868.htm>. Accessed April 22, 2016.

<sup>2</sup> U.S. Department of Agriculture Food Safety and Inspection Service. (April, 2011). Meat and Poultry Labeling Terms. Retrieved from: [http://www.fsis.usda.gov/wps/wcm/connect/e2853601-3edb-45d3-90dc-1bef17b7f277/Meat\\_and\\_Poultry\\_Labeling\\_Terms.pdf?MOD=AJPERES](http://www.fsis.usda.gov/wps/wcm/connect/e2853601-3edb-45d3-90dc-1bef17b7f277/Meat_and_Poultry_Labeling_Terms.pdf?MOD=AJPERES). Accessed April 22, 2016.

<sup>3</sup> Consumer Reports National Research Center. (October, 2015). Natural Food Labels Survey. Retrieved from [http://www.consumerreports.org/content/dam/cro/magazine-articles/2016/March/Consumer\\_Reports\\_Natural\\_Food\\_Labels\\_Survey\\_2015.pdf](http://www.consumerreports.org/content/dam/cro/magazine-articles/2016/March/Consumer_Reports_Natural_Food_Labels_Survey_2015.pdf) Accessed March 1, 2016.

<sup>4</sup> Natural Marketing Institute. (February, 2015). Consumer Insights on Organic and Natural. Retrieved from: <http://organicandnatural.org/wp-content/uploads/2015/10/Consumer-Insights-on-Organic-and-Natural-A-Research-Study.pdf>. Accessed March 1, 2016.

consumers, the use of the term “natural” on product labels appears to enhance the perception of wholesomeness, and perhaps healthfulness, of products. In fact, the term “natural” is currently used by some manufacturers and may convey that a food is more wholesome, which some consumers translate to mean a healthier food product for them.

ASN also notes that no synthetic vitamins can be added to a food product if it is labeled natural because the term “natural” is currently interpreted by FDA to mean that nothing artificial or synthetic has been included in or added to a food product<sup>1</sup>. ASN raises the concern that the continued public health protections from fortification/ enrichment with synthetic vitamins may be undermined by use of the term “natural”. Potential adverse consequences of use of the term “natural” include loss of the public health protection currently provided by the addition of synthetic vitamins. For example, there is a clear correlation between folic acid enrichment and prevention of major neural tube birth defects (e.g., anencephaly and spina bifida) in a developing fetus<sup>5</sup>. Neural tube defects may become even more of a concern without the protection that the current addition of synthetic folic acid to enriched cereal grain products provides to many women of child-bearing age. In fact, the reduction in neural tube defects due to the synthetic folic acid enrichment of cereal grain products represents one of the greatest public health successes of the 20<sup>th</sup> century. Because consumers increasingly desire products labeled as “natural” for their perceived wholesomeness and healthfulness, individual diets may begin to lack important nutrients of public health concern if synthetic vitamins are excluded from products labeled as “natural”.

ASN recommends that FDA raise awareness of any ruling regarding use of the term “natural”, prior to when it first appears on food products. Consumer education is necessary to lead to increased consumer understanding and therefore behavior change that benefits health. ASN urges FDA to fully involve all stakeholders, including ASN, in the implementation of any such consumer education campaigns.

ASN commends the Agency’s efforts to improve consumer literacy of the food label and, in the long run, improve public health. Clarity in the use of the term “natural” will help avoid misleading claims, and help consumers make more informed food choices for themselves and their families, translating into improved public health. Thank you for your consideration of ASN’s comments on the supplemental proposed rule. Please contact Sarah Ohlhorst, Director of Government Relations, [[sohlhorst@nutrition.org](mailto:sohlhorst@nutrition.org); 240.428.3647] if ASN may provide additional information.

Sincerely,



Patrick J. Stover, Ph.D.  
ASN President, 2015-2016

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<sup>5</sup>Institute of Medicine. Food and Nutrition Board (1998). [Dietary Reference Intakes: Thiamin, Riboflavin, Niacin, Vitamin B6, Folate, Vitamin B12, Pantothenic Acid, Biotin, and Choline](#). Washington, DC, National Academy Press. Accessed April 22, 2016.