

**Congress of the United States**  
Washington, DC 20510

May 9, 2016

The Honorable Robert M. Califf  
Commissioner  
U.S. Food and Drug Administration  
10903 New Hampshire Avenue  
Silver Spring, Maryland 20993

Dear Commissioner Califf:

On November 18, 2015, we reintroduced the Food Labeling Modernization Act (S.2301 and H.R. 4061), a bill that reflects our long commitment to ensuring that consumers are equipped with clear and accurate information that helps them make informed decisions about the food products they are purchasing. The bill includes a provision that directs the Food and Drug Administration (FDA) to promulgate a rule that relates to the term “natural” on food labeling. We are therefore pleased that the FDA has responded to citizen petitions and consumer confusion over the definition of the term “natural” on food labeling and issued a request for information and comments on the matter (Docket No. FDA-2014-N-1207).

We now write to submit our recommendations, outlined below, to address the consumer misunderstanding and harm that currently surrounds the use of the term “natural” in the labeling of human food products.

We believe FDA must promulgate a final rule relating to the term “natural” on food labeling, and we fully support this initial request for comments. Furthermore, we believe a final rule on the use of the term “natural” should expressly address the term’s use on both the principal display panel (also known as the front label panel) and the information panel (located to the immediate right of the principal display panel and which often includes nutrition labeling, the ingredient list, and allergy labeling).<sup>1</sup>

In promulgating this new rule, the FDA should conduct consumer surveys and studies, and review relevant consumer research, including how consumers understand the term “natural” in relation to the term “organic.” With that in mind, research recently conducted by Consumer Reports reveals that many consumers currently believe that the term “natural” on meat and poultry means that no artificial ingredients, growth hormones, genetically modified ingredients, or antibiotics were used. Additionally, for packaged and processed foods, consumers believe that this label currently means that no artificial ingredients, pesticides, or genetically modified ingredients were used.<sup>2</sup> Any rule should clear up these misconceptions.

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<sup>1</sup><http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm064866.htm#4>

<sup>2</sup> <http://www.greenerchoices.org/pdf/ConsumerReportsFoodLabelingSurveyJune2014.pdf>

In order to alleviate consumer confusion, we also urge the FDA to define “natural” to exclude, at minimum, the use of any artificial foods, ingredients, or synthetic substances.

Thank you for the opportunity to submit comments on this important issue. We would appreciate a written response that addresses the FDA’s plan of action in this area. We also look forward to continuous engagement with the FDA on the subject of concise and meaningful food labeling. We believe that nutrition information, ingredient lists, and health-related claims on food labels play an important role in the battle against obesity and diet-related disease. We are optimistic that, by considering our recommendations and finalizing robust requirements for the use of the term “natural,” the FDA will continue to help consumers develop a greater understanding of the foods they are purchasing.

Sincerely,



RICHARD BLUMENTHAL  
United States Senate



FRANK PALLONE, JR.  
Member of Congress



EDWARD J. MARKEY  
United States Senate



ROSA L. DELAURO  
Member of Congress