

May 10, 2016

*Protecting,
promoting, and
developing the
organic seed trade*

RE: Use of the Term “Natural” in the Labeling of Human Food Products (Docket No. FDA-2014-N-1207)

Organic Seed Growers and Trade Association (OSGATA) is the farmer-controlled national non-profit membership trade organization of certified organic farmers, certified organic seed companies, organic seed professionals, affiliate organizations and individuals dedicated to the advancement of certified organic seed. *OSGATA* is committed to protecting, promoting and developing the organic seed trade and its growers, thereby assuring that the organic community has access to excellent quality certified organic seed, free of genetic contaminants and adapted to the diverse needs of local organic agriculture.

OSGATA respectfully submits the following comments, on behalf of our membership, regarding the natural label:

The word "natural" is derived from the word "nature," and leads consumers to believe that foods bearing the natural label are derived from nature. However, the natural label, in its current application by the Food and Drug Administration (FDA), is misleading to consumers.

Within the marketplace, the expectation of consumers is that natural is the equivalent to the USDA certified organic label. A [December 2015 survey by Consumer Reports](#) found that 60% of consumers understood the term natural to mean that the labeled food product was produced without pesticides or chemicals, and also did not contain artificial additives or GMOs.

OSGATA advocates that FDA regulate natural in accordance with USDA organic standards. Requiring natural products to be certified organic gives measurable and enforceable rigor to the natural label. The existing USDA organic certification is regulated under the Organic Foods Production Act (OFPA) and has set forth a third-party verification system that meets consumer confidence.

Respectfully submitted,



Jim Gerritsen, President
OSGATA