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PMA Tackles 'Natural' Confusion in FDA Comments

Parsing every word isn't just for pols, but for marketers as well

June 7, 2016, 02:10 pm By Kathy Means, Produce Marketing Association



When produce marketers go to write copy, we scrutinize every word. The thesaurus is one of our best friends, and we count on researchers to plumb the depth of the consumer's mind to illicit below-the-surface meanings and innuendos.

Basically, words matter. This came up recently when the U.S. Food and Drug Administration (FDA) asked for comments about using the term "natural" on food because it is a prevalent marketing term, and the agency is trying to decide whether it should define "natural" for food labeling.

Well, many foods may rightly claim the word "natural," but if anything epitomizes "natural," it's fresh produce, and we want to make sure it stays that way. At PMA, we believe all fresh produce, by definition, should be allowed to use the word "natural" in food labeling if FDA moves forward to formally define the term.

This has happened before. In the 1990s, FDA went through the exercise of defining the word "fresh," which is another strong food/produce marketing term when it comes to catching consumers' attention. And in May, FDA indicated it may review the definition of "healthy" as well. This isn't the place to debate how far FDA should go in defining terms, but it is a great place to think about how we use words in marketing.

We did some research as we developed our comments, particularly The Hartman Group's Organic and Natural 2014. Hartman does a lot of research, trying to demystify consumers' understanding and attitudes about the foods they choose to eat. Hartman's work highlights that "organic and natural" are part of a broader consumer trend toward fresher, less-processed foods. Survey data suggests consumers perceive the term "natural" on food labels the same way they do "healthy." Specifically, the researchers conclude, consumers see "natural" as a gateway to better health.

However, consumers are quick to distinguish between "natural" as an ideal (simple, unadulterated, unmodified foods) and "natural" as a marketing term, according to the study. For many consumers, the word "natural" raises a red flag, the research showed, and today's consumers verify product claims by scrutinizing ingredient panels and nutrition facts.

The data in Organic and Natural 2014 demonstrate that "organic" is more likely to connote the absence of negatives, while "natural" tends to invoke more positive associations. Though this may seem arcane to some, food marketers dissect words like these, along with consumer impressions, all the time. We love it. And we believe it makes a difference in how consumers act toward our products.

When consumers describe products they consider truly natural, according to Hartman, they speak of simple, unmodified foods that are "pure," "fresh," and "real." This research showed that consumers continue to associate the term "natural" with unadulterated foods. When asked about purchasing decisions, consumers increasingly link the sourcing, processing, and ingredients of food not only to personal health but to the health of society, according to the study. This speaks not only to marketing verbiage but also to transparency, honesty, openness and more. But today we're talking about words.

Ultimately, we recommended that FDA should define the term "natural," so that the word is meaningful to consumers, who already may be suspicious of "natural" as a marketing term. PMA said produce (whole and fresh-cut) should be included

within those limitations. We specifically called out “raw agricultural commodities,” which is FDA lingo for “any food in its raw or natural state, including all fruits that are washed, colored, or otherwise treated in their unpeeled natural form prior to marketing.”

Beyond raw agricultural commodities, we noted, other types of food should be allowed to bear the term “natural,” but those should be limited to foods that do not contain artificial flavoring, artificial coloring, or chemical preservative (as defined by FDA).

In our comments, we noted that the word “natural” is:

- widely used on product labeling and there is no consensus regarding its meaning;
- a significant influence on consumer food purchasing decisions; and
- proper to be defined by FDA, as FDA regulates food labeling.

Beyond the specific inclusion of all fresh and fresh-cut produce for use with the word “natural,” PMA’s comments also noted that certain technologies should not preclude use of the term on fresh produce – technologies such as mild acid and chlorine washes, wax coatings and post-harvest pesticides, and irradiation up to 1 kiloGray used on produce.

FDA also asked whether breeding technologies (e.g. genetic engineering or hybridization) or production methods (e.g. organic or conventional) should be a factor in defining “natural.”

PMA said: “Agricultural breeding and production practices, such as genetic engineering or organic/conventional production methods, should not limit the labeling use of the term ‘natural.’ Food for human consumption should be able to meet the requirements for labeling as ‘natural’ irrespective of plant breeding technique or production practice.”

By Kathy Means, Produce Marketing Association



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