



Research & Development

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October 9, 2006

Dr. Robert C. Post
Director, Labeling and Consumer Protection Staff
Food Safety and Inspection Service, USDA, Suite 602, Annex
1400 Independence Avenue SW
Washington, DC 20250

RE: Petition for the Issuance of a Rule Regarding Natural Label Claims

Dear Dr. Post:

Enclosed is the Petition for rulemaking regarding the Natural Policy. As we have discussed over the past several months, the August 2005 revisions have created inconsistencies within the Policy. If the policy is misused, these inconsistencies will allow a Natural label to be placed on products that contain synthetic ingredients and preservatives, which will deceive consumers and erode the "Natural" label to a meaningless marketing ploy. As is made clear in the petition, consumers, manufacturers and the various agencies all believe rulemaking is essential to avoid this result.

As is also made clear in the petition, consumers believe "natural" means that the product bearing the label is free of artificial colors, flavors, preservatives and other synthetic or artificial ingredients. To allow products that do contain these ingredients to bear a Natural label is a betrayal of the public trust.

We urge the FSIS to act quickly to expedite rulemaking that will codify the definition of "natural." Further, the FSIS must act immediately to prevent public deception and issue interim guidance reinstating the original, November 1982 Natural Policy.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark S. Roberts". The signature is written in a cursive, flowing style.

Mark S. Roberts
Manager, Technical Services and Regulatory Affairs
Research and Development

cc: The Honorable Richard Raymond, Under Secretary of Food Safety
US Department of Agriculture