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April 9, 2007

Division of Dockets Management
Food and Drug Administration
Department of Health and Human Services
5630 Fishers Lane
Room 1061
Rockville, Maryland 20852

To Whom It May Concern:

I am submitting the attached citizen petition to request the Food and Drug Administration (FDA) to work jointly with the U.S. Department of Agriculture's Food Safety and Inspection Service (FSIS) to devise and adopt a uniform policy governing use of the term "natural." This request is submitted to FDA under section 403 of the Federal Food, Drug, and Cosmetic Act (FFDCA) and 21 CFR § 10.30.

As discussed in the petition, a single, uniform "natural" policy that captures the common elements of the current FDA and FSIS policies would provide consistency for consumers and food manufacturers over the large variety of foods that bear a "natural" claim. A uniform policy would meet each Agency's statutory obligation for ensuring that food labeling is neither false nor misleading and represent yet another instance in which the Agencies act in concert to advance the mutual goal of consumer protection.

To provide optimal food safety options, a uniform "natural" policy should recognize that natural preservatives are consistent with "natural" claims. Moreover, to adequately address the numerous contexts in which a "natural" claim can be used, the term should be defined in a flexible policy that provides for case-by-case consideration of the term.

I have enclosed four paper copies of the petition and appendices as well as a CD of electronic copies of the documents. A similar petition has been submitted to the FSIS Docket Clerk. Please do not hesitate to contact me if I can be of assistance or provide further information.

Respectfully submitted,

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