



Oregon

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Docket Management Branch
Food and Drug Administration
5630 Fishers Lane
Room 1061 (HFA-305)
Rockville, MD 20852

RE: Docket Number 200P-0094

Petition re Definition of the term "Natural" for making claims on food and beverages regulated by the FDA.

To the Food and Drug Administration:

The Oregon Raspberry and Blackberry Commission (ORBC) supports the Sugar Associations' petition requesting that the Commissioner of Food and Drugs (FDA) undertake rulemaking to establish specific rules and regulations governing the definition of "natural" as it is used to market food and beverages regulated by the FDA.

ORBC agrees that consumers would be benefited by accurate and consistent definition of natural for all food and beverages regardless of the agency directly assigned to regulate the product. The United States Department of Agriculture (USDA) has previously defined "natural" in its *Food Standards and Labeling Policy Handbook*¹ On December 5, 2006 the USDA announced they were initiating rulemaking regarding a similar petition regarding the term "Natural" as it is used for marking meat and poultry. The USDA said in their summary press release:

*"The Agency has decided to initiate rulemaking because it is the most appropriate, open, and transparent method to deal with issues surrounding the definition and use of the claim 'natural.'"*²

The ORBC agrees that the process of rulemaking will generate the appropriate comments from consumers, industry and academics. While the Sugar Association's petition is well composed and well thought out, an issue of such great public concern should be opened to comments so that sound policy can be established. Initiating rulemaking would further polish the petition such that an actionable definition of the term "natural" is established and oversight meets the needs of both consumers and industry in a cost effective manner.

Recent mandates for Trans-fat disclosure and Allergen Labeling have illustrated that industry can respond to consumer concerns by modifying their operations once definition and guidance is provided.

¹ USDA Food Standards and Labeling Policy Book, August 2005.

www.fsis.usda.gov/oppde/larc/policies/labeling_policy_book_082005.pdf

² From 12/05/06 USDA FSIS Press release Federal Register Volume 71, Number 233 Page 70503-70505.

2006P-0094

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Additionally, the discussions regarding the FDA's Current Good Manufacturing Practices illustrate that industry has a desire to assist in the development of additional and updated oversight to meet the changing times and better protect and serve the public interest.

The ORBC thanks the FDA for its consideration of this issue.

Regards,

A handwritten signature in black ink, appearing to read 'Philip Gutt', written in a cursive style.

Philip Gutt
Administrator