A "Natural" Gap In Consumer Understanding?

A Response and a Potential Way Forward

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What is “Natural”?

The draft article, *A “Natural” Gap? Claims, Consumers and Cases.* made striking points about “natural” and consumer understanding:

–Powerful impact of the claim

- When given a choice, consumers will select the “natural” product 68% of the time (draft, at p. 7)

–Contradictory understandings of meaning

- Must all ingredients of a food be “natural”? Can some be man-made? Mixed understanding of “Nothing Artificial” (Id.)
- Could consumers regard a food as “natural” even though it may include “artificial ingredients” that nonetheless enable it to function in the normal and expected manner?

–The core understanding:

- “Natural” seems to connote a process, as opposed to a set of ingredient attributes (draft, at p. 3)

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Labeling Challenges

- "Natural," "Non-GMO," "Nothing Artificial," and similar claims are indeed "heuristics"
  - Mental shortcuts that capture, in simple terms, complex processes and allow consumers make quick decisions – and snap judgments!
- The risk? Using such terms in food labeling creates the potential to mislead consumers about product attributes and can even provide a potentially misplaced sense of reassurance

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Case in Point: “Non-GMO”:

FOOD navigator-usa.com

87% of consumers globally think non-GMO is ‘healthier’. But where’s the evidence?

By Elaine Watson+

13-Aug-2015

Last updated on 13-Aug-2015 at 16:35 GMT

13 comments

A recent survey in the U.S. and 15 major global markets showed an astonishing number of primary shoppers believe that GMOs are less safe and that Non-GMO products are healthier

Yet there is no evidence to suggest that GMOs are either unsafe or materially different from Non-GMO foods

An opportunity for the food label to step in? Yes!

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Rising Demand for Transparency

There is mounting evidence of consumer interest in the process by which food is made, the “genealogy” of a food; the popularity of process-oriented labels can be seen in their proliferation in world markets:

- Consumer purchases of “organic” foods have risen by over $17 billion since the late 1990s
- Market for “eco” labels is robust, with more than 460 labels in nearly 200 countries relating to 25 industry sectors (“Eco Label Index”)
- Wide following for Rainforest Alliance Certified logo for produce from tropical countries and adoption by large suppliers such as Dole and Chiquita


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Challenges / Opportunities

- How best for the the food industry and its agricultural partners to:
  - Respond effectively to consumer demands for transparency?
  - Label for the use of little known or commonly misunderstood ingredients and processes in a way that is informative and helpful?
  - Provide clarity and the right amount of information?
  - And do this without driving consumers away?

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A Path Forward?

- USDA, pursuant to the National Bioengineered Food Disclosure Standard, is developing the rules by which foods will be required to disclose their use of genetically engineered ingredients
- Campbell Soup research showed that consumers are open to informative and transparent labeling about GMOs
  - Could these findings have relevance for labeling “natural” in a transparent way?

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The Research Path

Campbell asked over 2,000 consumers to evaluate nine options for GMO disclosure

Each statement was presented to consumers in the context of a label image, at right

- Input from marketing teams and legal
- One option used wording drawn from the Vermont law, later preempted by federal legislation

Example of Stimulus

VEGETABLE SOUP

Nutrition Facts
Serving Size 1 cup (240mL)
Servings Per Container about 2

Amount Per Serving	
Calories 100	Calories from Fat 5
	% Daily Value*
Total Fat 0.5g	1%
Saturated Fat 0g	0%
Trans Fat 0g	
Cholesterol 0mg	0%
Sodium 770mg	32%
Total Carbohydrate 20g	7%
Dietary Fiber 4g	16%
Sugars 5g	
Protein 3g	
Vitamin A 30% • Vitamin C 4%	
Calcium 4% • Iron 4%	

* Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:

	Calories:	2,000	2,500
Total Fat	Less than	65g	80g
Sat Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g

Satisfaction guaranteed. If you have questions or comments, please call 1-888-711-0358. Please have code and date information from container.

INGREDIENTS: WATER, POTATOES, CARROTS, TOMATO PUREE (WATER, TOMATO PASTE), CELERY, CORN, GREEN BEANS, PEAS, DICED TOMATOES IN TOMATO JUICE, CONTAINS LESS THAN 2% OF: MODIFIED FOOD STARCH**, SALT, HIGH FRUCTOSE CORN SYRUP**, DEHYDRATED ONIONS, YEAST EXTRACT**, FLAVORING**, HYDROLYZED SOY PROTEIN**, SPICE, CARAMEL COLOR**, HYDROLYZED WHEAT GLUTEN.

****PARTIALLY MADE WITH GMOs. GMOs ARE INGREDIENTS DERIVED FROM GENETICALLY ENGINEERED CROPS. THE FDA CONSIDERS GENETICALLY ENGINEERED CROPS SAFE.**

HEATING DIRECTIONS
DO NOT ADD WATER

STOVE: Heat, stirring occasionally. Enjoy.

MICROWAVE: ***Microwave ovens vary. Time given is approximate. Uneven microwave heating may cause popping, movement of the bowl and/or splattering.***

1. Heat, covered, in medium microwavable serving bowl on HIGH 2 1/2 to 3 min.
2. Careful, leave in microwave 1 min.
3. Stir & serve. Promptly refrigerate unused product in separate container.

Disclosure options were as follows:

Statement 1. Partially made with GMOs. GMOs are ingredients derived from genetically engineered crops. The FDA considers genetically engineered crops safe.
Statement 2. Partially made with GMOs. Corn, soy and sugar are derived from genetically engineered crops.
Statement 3. Partially made with GMOs. GMOs are ingredients derived from genetically engineered crops.
Statement 4. Partially made from genetically engineered crops.
Statement 5. This product contains corn, soy and sugar, which were grown using genetic engineering.
Statement 6. This product contains GMO corn, soy and sugar.
Statement 7. The corn, soy and sugar in this product come from genetically modified crops.
Statement 8. The corn, soy and sugar in this product come from genetically modified crops. The FDA considers GMO crops to be safe.
Statement 9. We are committed to informed choice. Partially made with GMOs. GMOs are ingredients derived from genetically engineered crops.

Key Findings

The FDA's view on GMO safety was frequently mentioned as the reason for selecting their top statement. The FDA statement helped with scores related to metrics for having the right amount of information.

It tells you what ingredients are the GMO and that the FDA has considered them safe

It tells exactly which products are GMOs, and also lets the buyer know what the FDA thinks of these.

Many appreciate the clarity that comes from noting specific ingredients affected (e.g., corn, soy and sugar).

It not only tells you the product comes from GMO crops but also the ingredients: corn, soy and sugar.

It goes one step further to specify which ingredients.

Consumers want a statement that is direct and to the point, in their language (GMO).

It doesn't tell you enough about genetic engineering. What it is and what it's used for.

It's simple and has the information that I need.

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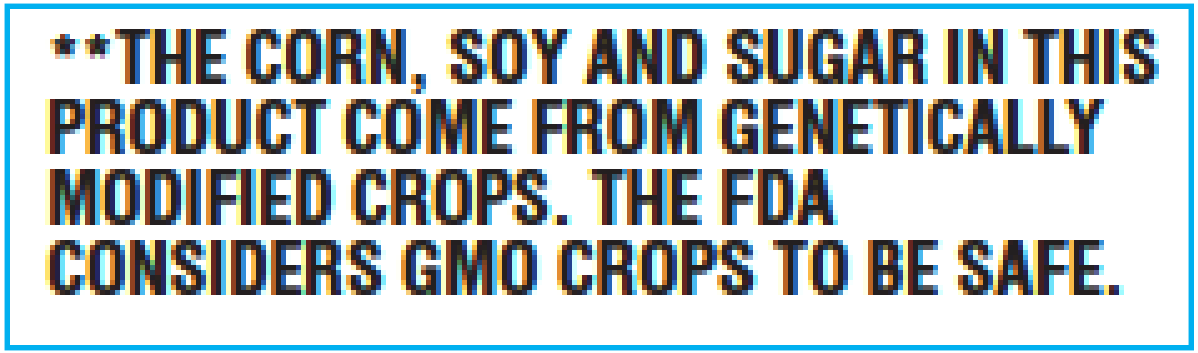
Rated Highest:



This labeling statement had strong preference scores because it hit on the three key learnings:

- It provided reassurance that GMO crops are safe
- The specific ingredients were noted in the labeling statement.
- It was direct and to the point and used language consumers understood.

SOURCE: Campbell Soup LRW GMO Labeling Study May 2016

Whom Do You Trust?

Consumers: FDA is the most trusted source for food information.

Food and Drug Administration (FDA)	48%
Nutritionist	39%
United States Department of Agriculture (USDA)	36%
Doctor	34%
Center for Disease Control and Prevention (CDC)	29%
American Medical Association	27%
World Health Organization	24%
Science publications	22%
University research	22%
My local farms or farmers market	21%
Grocery stores	15%
Government websites	12%
Food companies	12%
Social media	10%
Mainstream media	8%
International Regulatory Agencies	7%
TV talk shows	7%
Bloggers	6%
Personal trainer	5%
Other (please specify)	2%
None of these	9%

SOURCE: Campbell Soup LRW GMO Labeling Study May 2016

D3 Which of the following sources, if any, do you trust to look at when it comes to information about food topics?

What do Consumers Want?

- **Inform them about how their food is made and where it comes from**
  - Insights into food systems and processing
- **Explain unfamiliar ingredients and processes**
  - Tell consumers more, not less! “This food is natural, because…”
  - Promote acceptance that “natural” can support a mix of naturally occurring and processed ingredients
- **Cite FDA assurance of safety and usefulness**
  - Example: “Xanthan gum is a safe, soluble fiber and thickener that allows the dressing in this bottle to flow smoothly over your salad. Enjoy!”

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Appendix

Abstract:

Historical and Contemporary Role of the Consumer in the Regulation of Food Labeling

Michael T. Roberts

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Resnick Program

A Response

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Let the Consumer Decide!

- The food and drug laws − the ‘06 and ‘38 Acts − are designed to protect consumers from deception.
- While the laws have evolved, the enduring purpose has been to let consumers have information
  - FDA for example, has given up fighting EMA with recipe standards and believes labeling can solve this perennial problem
  - Labeling has now become crowded and complex, with Nutrition Facts, allergens, COOs, ingredients, FOP
  - But the consumer role has remained the same − read the label and make decisions based on the information it provides
- Is there now room for well-qualified “natural,” GMO and other process claims? Consumers seem to be insisting on their right to know!

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Embracing Transparency…

On the label, the food industry and agriculture are looking for ways to deliver information that consumers are demanding:

- Chicken of the Sea interactive digital traceability website
  - https://chickenofthesea.com
  - Where caught, fishing method, where processed and canned
- Hershey's website, with an "A to Z glossary" of all its ingredients, with easy-to-understand descriptions
- At egg and meat processing plants, cameras and picture windows to allow consumers to see how animals are treated in real time

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A Plea for the “Process Label”

“Under appropriate government or third party oversight, these ‘process labels’ can effectively bridge the information gap between producers and consumers, satisfy consumer demand for broader and more stringent quality assurance criteria and ultimately create value for both producers and consumers.”

•CAST Issue Paper 56

http://www.cast-science.org/download.cfm?PublicationID=283819&File=1030ac46417e576660c87b6b2553352b6624TR

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