

To the attention of Ms. Stella Kyriakides  
European Commissioner for Health and Food Safety  
European Commission, Rue de la Loi 200  
B – 1049 Brussels

Brussels, 10 February 2021

**Subject: Misleading use of the term “natural” on food products affects EU consumers’ information threatening the achievement of the goals set in the Farm to Fork Strategy**

Dear Commissioner Kyriakides,

During this Commission’s mandate, you expressed your commitment to protect consumers’ health and information by establishing a new sustainable labelling framework reflecting the shift towards a new food system. As mentioned in the [Farm to Fork Strategy](#), the Commission aims at promoting sustainable food consumption and facilitating the shift to healthy, sustainable diets by establishing a set of legislative proposals to enforce rules on misleading information.

To achieve this goal, we invite the Commission to draw its attention on a serious issue, risking to jeopardise the realisation of this paramount goal. The EU is currently lacking a legal definition of the term “natural” for foodstuff. Consequently, the claim is often used by food manufacturers to promote food characteristics that diverges consistently from the final product composition.

The urgency for addressing the problem is represented by several examples of misleading use of the term on products available on the market, affecting consumers’ daily life and contrasting with several EU legislations. [The Regulation on health and natural claims made on food](#) explicitly mentions that food labelling criteria “*would aim to avoid a situation where nutrition or health claims mask the overall nutritional status of a food product, which could mislead consumers when trying to make healthy choices in the context of a balanced diet*”<sup>1</sup>.

The Regulation also provides a general definition of “natural” for food claims. According to the Annex, a product can be labelled as natural when it fulfils the conditions for the use of a nutritional claim<sup>2</sup>. The Regulation focuses on providing information on the quantities of nutrients present in food but does not set specific labelling criteria that food producers should follow when informing consumers on products’ properties.

The concept is further stated in Article 7 of the [Regulation on Food Information to Consumers](#) that stipulates that information on food products “shall not be misleading” as for their characteristics, including their nature, as well as their identity, properties, and country of origin, among others.

The Commission risks to fail in addressing not only the Green Deal and the Farm to Fork strategy objectives but the general EU food law goals, if decides to leave unconsidered this considerable gap of our food labelling framework. We fear that missing a clear definition of the term “natural” for food products will not put consumers in the conditions to make conscious and healthier choices, given their rising general will of understanding more of the composition and ingredients of food products.

A [report](#) recently published by Safe Food Advocacy Europe highlights this issue<sup>3</sup>, showing concrete examples of misleading use of the term “natural” on food products. It is shown that consumers in general

---

<sup>1</sup> Para. 10 of Regulation No 1924/2006 on nutrition and health claims made on foods.

<sup>2</sup> The Annex says « *NATURALLY/NATURAL- Where a food naturally meets the condition(s) laid down in this Annex for the use of a nutritional claim, the term ‘naturally/ natural’ may be used as a prefix to the claim* » Regulation No 1924/2006 on nutrition and health claims made on foods.

<sup>3</sup> Further examples of media engagement can be found here: Euractiv <https://www.euractiv.com/section/agriculture-food/news/agrifood-brief-you-make-me-feel-like-a-natural-product/> Food navigator <https://www.foodnavigator.com/Article/2020/12/01/What-does-100-natural-mean-EU-urged-to-impose-definition-for-food-products>

connect the term ‘natural’ to positive associations related to origin, minimal processing and/or absence of additives, basing their choices on incorrect assumptions.

We call on the European Commission to tackle this issue by ensuring that:

- The EU food law defines a clear definition of “natural” for food products.
- The EU food law foresees criteria to use the term “Natural” on labels to ensure proper information to consumers.
- Information as the origin of the ingredients and the real composition of the products are easily recognisable by the consumers.
- Natural-labelled products are GMO-free, synthetic substances free and 100% biodegradable.

We thank you in advance for supporting the protection of the health of all European consumers and to apply the principles affirmed in the Green Deal in an effective and proportionate way.

Yours faithfully,

MEP Francisco Guerreiro (Greens/EFA)

MEP Pernicola Pedicini (Greens/EFA)

MEP Sara Wiener (Greens/EFA)

MEP Marc Angel (S&D)

MEP Anna Deparnay-Grunenberg (Greens/EFA)

MEP Michele Rivasi (Greens/EFA)

MEP Martin Hausling (Greens/EFA)

MEP Ignazio Corrao (Greens/EFA)

MEP Martin Buschmann (Not-attached)

MEP Milan Brglez (S&D)

MEP Rosa D'Amato (Greens/EFA)

MEP Eric Andrieu (S&D)

MEP Alexis Georgoulis (GUE/NGL)

MEP Eleonora Evi (Greens/EFA)

MEP Costas Mavrides (S&D)

MEP Christel Schaldemose (S&D)

MEP Sylwia Spurek (Greens/EFA)

MEP Ivan Stefanec (EPP)

MEP Emmanuel Maurel (GUE/NGL)

MEP Pascal Arimont (EPP)

MEP Tilly Metz (Greens/EFA)

MEP Philippe Lamberts (Greens/EFA)

MEP Manuela Ripa (Greens/EFA)

MEP Martin Hojsik (Renew Europe)  
MEP Antoni Comin I Oliveres (Not-attached)  
MEP Kira Peter-Hansen (Greens/EFA)  
MEP Margrete Auken (Greens/EFA)  
MEP Grace O'Sullivan (Greens/EFA)  
MEP Claude Gruffat (Greens/EFA)  
MEP Anja Hazekampt (GUE/NGL)  
MEP Ivan Vilibor Sinčić (Not-attached)