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Dear Honourable Members,

I thank you for your letter of 10 February 2021 in relation to the claim “natural” on food products.

I take good note of your concern that the lack of an EU legal definition of the term “natural” for foods risks that consumers may be misled as to the true properties of a food. As you point out, the term “natural” can be used by food manufacturers to promote food characteristics that may diverge from consumer expectations of characteristics that a food should possess in order to be “natural”. I also note that you consider that such misinformation would not be in line with the aims and objectives of the Farm to Fork Strategy.

I would like to reassure you that I continue to be committed to protect consumers’ health and information by working in the coming years on a number of initiatives with respect to provision of clear information that will make it easier for consumers to choose healthy and sustainable diets, in line with the Farm to Fork Strategy. These Commission initiatives include in particular mandatory front-of-pack nutrition labelling, extension of mandatory origin or provenance indications to certain products and a sustainable labelling framework.

Regarding nutrition and health claims to which you refer in your letter,¹ we do not consider that “natural” as a claim falls within the definition of either a nutrition or a health claim in the meaning of this Regulation. However, “natural” as an additional description is possible for accompanying nutrition claims if the specific condition of use is met.²

In addition specific requirements for the use of the term “natural” are also provided in the Regulation on flavourings and certain food ingredients with flavouring properties for use in and on foods³.

¹ Regulation (EC) No 1924/2006 of the European Parliament and of the Council of 20 December 2006 on nutrition and health claims made on foods, OJ L 404, 30.12.2006, p. 9

² “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”.

³ Regulation (EC) No 1334/2008 of the European Parliament and of the Council of 16 December 2008 on flavourings and certain food ingredients with flavouring properties for use in and on foods and amending

For the other cases, in the absence of harmonisation of the term “natural” at EU level and subject to specific national provisions on the matter as the case may be, the term “natural” is to be assessed as voluntary information. As such, it needs to fulfil the requirements of Regulation on food information to consumers⁴ which provides that food information provided on a voluntary basis shall not mislead the consumers; it shall not be ambiguous or confusing for the consumers and shall, where appropriate, be based on relevant scientific data. In this regard, a potential misleading use of the indication “natural” on a specific food should be assessed on a case-by-case basis by also taking into account all the provisions of the Regulation.

Let me stress that Member States are responsible to conduct such case-by-case assessments on the non-misleading character of such voluntary indications, when these are not defined by Union legislation, taking into account all the elements mentioned in the Regulation, as well as consumer understanding and perception.

In light of these elements, I consider that the EU rules are providing the appropriate legal framework in relation to using the claim that a food product is “natural” and for Member States’ competent authorities to enforce the provisions so that consumers are not misled.

I thank you again for your contribution how to improve consumer information and look very much forward to our close cooperation on the implementation of the Farm to Fork Strategy and its Action Plan.

Yours sincerely,



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Council Regulation (EEC) No 1601/91, Regulations (EC) No 2232/96 and (EC) No 110/2008 and Directive 2000/13/EC (OJ L 354 31.12.2008, p. 34)

⁴ Article 36 of Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers, OJ L 304, 22.11.2011, p. 18

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