

December 7, 2015

Leslie Kux
Associate Commissioner for Policy
Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Submitted electronically to <http://www.regulations.gov>

Re: Department of Health and Human Services, Food and Drug Administration: Use of the Term “Natural” in the Labeling of Human Food Products; Request for Information and Comments. 21 CFR Part 101, Docket # FDA-2014-N-1207; Fed. Reg. Vol. 80, # 218 (November 12, 2015).

Dear Associate Commissioner Kux,

The American Nurses Association (ANA) welcomes the opportunity to offer comments on this bulletin. As the only full-service professional organization representing the interests of the nation’s 3.4 million registered nurses (RNs), ANA is privileged to speak on behalf of its state and constituent member associations, organizational affiliates, and individual members. RNs serve in multiple direct care, care coordination, and administrative leadership roles, across the full spectrum of health care settings. RNs provide and coordinate patient care, educate patients and the public about various health conditions, and provide advice and emotional support to patients and their family members. ANA members also include the four advanced practice registered nurse (APRN) roles: nurse practitioners, clinical nurse specialists, certified nurse-midwives and certified registered nurse anesthetists.

General Comments:

ANA strongly urges the FDA to prohibit the use of the term “natural” in the labeling of human food products that are genetically engineered or contain ingredients produced through the use of genetic engineering. Furthermore, ANA requests that the FDA require clear, appropriate food labeling including the country-of-origin and any genetic modification of any of the food’s ingredients. The public has a right to know the contents of their food and food products and the manner in which they were processed or modified (ANA, 2008).

ANA supports all of the *Principles of a Healthy, Sustainable Food System*, but particularly notes the specific principles below as they relate to this request for information and comments (ADA, ANA, APA, APHA, 2010).

“A healthy, sustainable food system is:

Health-promoting

- Accounts for the public health impacts across the entire lifecycle of how food is produced, processed, packaged, labeled, distributed, marketed, consumed and disposed

Transparent

- Provides opportunities for farmers, workers and eaters to gain the knowledge necessary to understand how food is produced, transformed, distributed, marketed, consumed and disposed.
- Empowers farmers, workers and eaters to actively participate in decision-making in all sectors of the system” (Academy of Nutrition and Dietetics, ANA, APA, APHA, 2010).

Conclusion

We appreciate the opportunity to comment on this important issue. If we can be of further assistance, or if you have any questions or comments, please feel free to contact Holly Carpenter, BSN, RN, Policy Associate, ANA Nursing Practice and Work Environment at holly.carpenter@ana.org or 301-628-5105.

Sincerely,



Debbie D. Hatmaker, PhD, RN, FAAN
Executive Director

cc: Pamela Cipriano, PhD, RN, NEA-BC, FAAN, ANA President
Marla Weston, PhD, RN, FAAN, ANA Chief Executive Officer

References

American Nurses Association (ANA). (2008). House of Delegates Resolution: *Healthy food in health care*. Accessed 11/30/15 at

<http://www.nursingworld.org/MainMenuCategories/WorkplaceSafety/Healthy-Work-Environment/Environmental-Health/PolicyIssues/HealthyFoodinHealthCare.pdf>

Academy of Nutrition and Dietetics, American Nurses Association (ANA), American Planning Association (APA), & American Public Health Association (APHA). (2010). Principles of a healthy, sustainable food system. Accessed 11/30/15 at

<https://www.planning.org/nationalcenters/health/foodprinciples.htm>