



December 20, 2018

U.S. House of Representatives
Washington, D.C. 20515

Dear Representative:

Consumer Reports (CR), an independent, nonprofit member organization that works side by side with consumers for truth, transparency, and fairness in the marketplace, urges you to **vote no** on **S. 2322**, the Codifying Useful Regulatory Definitions (CURD) Act. This bill would only add to consumer confusion at the supermarket and undermine ongoing efforts to make food labeling clearer and more consistent.

S. 2322 would amend the Federal Food, Drug, and Cosmetic Act to set a definition of “natural cheese” and prohibit food from being labeled as “natural cheese” unless it meets that definition. Unfortunately, this seemingly mundane bill would allow cheese to be labeled “natural” even if the cheese includes artificial ingredients or synthetic substances, such as yellow food dye, or if the cheese was produced using methods or pesticides that consumers do not consider “natural” according to our recent survey.

Generally, S. 2322 would permit misleading food labeling on cheese that is inconsistent with consumers’ understanding of the term “natural.” According to Consumer Reports’ nationally representative April 2018 survey of 1,014 U.S. residents, most Americans think “natural” should mean: (1) that no artificial ingredients were used (81%); (2) that no added hormones were used during food production (81%); and (3) that no chemical pesticides were used during food production (79%).¹ The CURD Act would allow the label “natural cheese” on products with any of these characteristics.

We also oppose S. 2322 because it would undermine ongoing work at the Food and Drug Administration (FDA) to define “natural” through a process that prioritizes the public interest and involves the input of all stakeholders. This effort intends to define the term “natural” in a way that is not misleading and based on consumer understanding, and that applies to all foods in the marketplace overseen by the agency. We support this initiative, especially because our April 2018 survey found that 88% of Americans think that all companies should meet the same standard for the “natural” label.² Congress should not short-circuit this important work by setting a special definition of “natural cheese.”

The CURD Act ultimately places the interests of cheese producers ahead of the broad need for consumers to understand what they’re buying and feeding their families. We urge you to support a clear, consistent, and accountable food marketplace for consumers, and **vote no** on **S. 2322**.

Sincerely,

Jean Halloran
Director, Food Policy Initiatives
Consumer Reports

Charlotte Vallaeys
Senior Policy Analyst
Consumer Reports

William Wallace
Senior Policy Analyst
Consumer Reports

¹ Consumer Reports Survey Group, *Natural and Antibiotics Labels Survey* (May 1, 2018) (advocacy.consumerreports.org/wp-content/uploads/2018/10/2018-Natural-and-Antibiotics-Labels-Survey-Public-Report-1.pdf#page=3).

² *Id.*