

Report



EUROPEAN CONSUMER SURVEY

Enhancing Transparency in Food Products

November 2024





European Consumer Survey

SAFE Food Advocacy Europe

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1. Executive summary

In an era when consumers are increasingly health-conscious and environmentally aware, understanding the information presented on food labels has become more crucial than ever. SAFE – Safe Food Advocacy Europe, a European consumers' organisation based in Brussels, has identified a pressing **need for greater transparency and clarity** in food labelling, particularly regarding the use of terms such as *'natural'*. In collaboration with Ethica, SAFE conducted a comprehensive survey across Europe to **assess consumer perceptions of food labels**, with a focus on the term *'natural'*. The survey results reveal a wide range of interpretations among EU consumers, highlighting the necessity for more precise regulations and clearer labelling practices.

This research effort, conducted through a detailed **web survey involving 5,000 participants across Italy, Spain, France, Germany and Poland**, sheds light on European **consumers' perceptions of food labels**. This study aims at identifying what kind of information should be included on food product labels to allow European consumers making informed decisions. It also goes in-depth into various aspects of food labelling, ranging from the importance of comprehensive and transparent information to the influence of packaging features on consumer decisions. Another key investigation area of the study examines the differentiation between *'natural'* and *'non-natural'* ingredients, concluding with an assessment of consumers' views on the current labelling legislation.

The findings reveal a clear demand for more detailed and understandable information on food labels, including the need for a **harmonised definition of 'natural'** food products, greater label transparency and clearer requirements for environmental claims. For instance, only 33% of respondents believe that food companies provide all the necessary information on labels. This skepticism is particularly pronounced in France, where nearly 80% of consumers **doubt the completeness and transparency of food labels**. Furthermore, 90% of the sample believes that **legislation should require a clear indication** on the label of whether one or more non-natural substances are used in the product.

The EU legislation should therefore take into consideration the concerns expressed by European consumers, by **simplifying language** on labels whenever possible, clearly indicating the presence of health-impacting substances, and enhancing trust in the information provided by food companies. There is also a **preference for natural ingredients and eco-friendly packaging**, reflecting broader trends towards better health consciousness and environmental sustainability.

In conclusion, SAFE calls the EU to implement key policy changes to improve food labelling transparency. The EU should establish a **standardized, legally binding definition of 'natural' food products**, specifying ingredient origins, processing methods, and modifications. **Enhanced regulatory oversight**, including stricter inspections and penalties, is essential to ensure label accuracy. SAFE also advocates for **consumer education** on the term *'natural'* and calls for environmental claims like *'carbon neutral'* to be backed by **verifiable data**. These measures aim to empower consumers to make healthier, informed choices.

2. Introduction

The role of **labelling and packaging** in the European Union (EU) cannot be understated, particularly when it comes to consumer protection, food safety, and the maintenance of high standards stemming from the EU food legislation. Packaging and labelling are crucial interfaces between food producers and consumers, serving not only as vehicles for **marketing** but also as **key sources of information** that empower consumers to make informed decisions enabled by freedom of choice and fair competition. This dual role highlights the importance of **transparency and clarity in labelling**, particularly in the context of a rapidly evolving food industry where the demand for healthy, safe, and ethically-produced food is growing.

For consumers, labels are the most immediate source of information regarding the **contents, origins, and quality** of the products they purchase. The accuracy and transparency of this information are critical in protecting consumer rights, ensuring food safety, and fostering trust in the food supply chain. This is particularly important in the EU, where food safety regulations and consumer protection laws are designed to uphold high standards across all Member States. However, challenges arise when certain terms used on food packaging, such as *'natural'*, **lack a clear legal definition**, leading to potential consumer confusion and to misleading claims.

The term *'natural'* is one of the most contentious claims in the EU food market today. Despite its widespread use, there is no harmonised EU regulation that clearly defines what constitutes a *'natural'* food product. **This regulatory gap has resulted in a proliferation of products labelled as 'natural', with varying meanings and implications for consumers.** In many cases, the use of the term can be misleading, as it may imply that a product is free from synthetic additives, healthier, or more environmentally friendly than it is. The ambiguity surrounding the term can undermine consumer trust and challenge the EU's broader goals of transparency and ensuring food safety.

SAFE – Safe Food Advocacy Europe recognises the critical need for clarity and transparency in food labelling, particularly in the use of terms like *'natural'*. As part of its mission to protect consumer rights and ensure food safety, and in collaboration with Ethica and Toluna, two companies from Italy and the UK, SAFE has conducted a comprehensive **survey across Europe to gauge consumer perceptions of food labelling**, with a specific **focus on the term 'natural'**. The survey results highlight the **diverse interpretations and understandings of this term** among EU consumers, underscoring the **need for more precise regulations and clearer labelling practices.**

This report presents the findings of the survey, offering valuable insights into **how consumers perceive different types of food labels**, including those related to natural, synthetic, and chemical ingredients. By examining these perceptions, the report sheds light on the **current state of transparency in food labelling** across the EU and advocate for **stronger regulations that better protect consumers from misleading claims.** Furthermore, it seeks to contribute to the ongoing dialogue on how the EU can continue to uphold its high standards in food safety and consumer protection in an increasingly complex and dynamic food market.

In conclusion, the importance of packaging and labelling in the EU extends far beyond the superficial aspects of marketing; it is fundamentally about ensuring that consumers have **access to accurate, reliable, and understandable information** about the food they eat. As the use of terms like *'natural'* continues to grow in popularity, so does the need for robust regulatory frameworks to ensure that these labels truly reflect the **values of transparency, safety, and quality that the EU upholds.** Through its research and advocacy, SAFE is committed to promoting these standards and protecting consumers from misleading information, ultimately contributing to a safer, more sustainable and more transparent EU food system for all.

3. Survey

The main goal of this research is to **identify the most accurate information to be included on the labels** of food products, with the aim of correctly and effectively informing European consumers. This is achieved through the following detailed objectives, prioritising the consumers' perception of what is missing and should be added to the labels to improve transparency and provide full information.

- 1) The research aimed to determine how **comprehensive** food product packaging information is, and how important and critical **transparency** is for EU citizens.
- 2) The survey prioritised understanding the **meaning EU citizens give to terms that describe the nature of a substance**, such as '*natural*', '*vegan*', '*synthetic*', '*chemical*', '*artificial*', '*GMO*', etc., and evaluating which of these terms are most clearly understood.
- 3) Analysing the perceptions of EU citizens and how felt and intense is the need for **clear and non-misleading information** written on labels of food products, thus understanding what kind of label information is particularly appreciated in terms of clarity and transparency.
- 4) Detecting the **main elements of packaging**, beyond the label, that influence people's consumption choices.
- 5) Understanding how important people consider label **transparency** regarding the presence of **natural or non-natural substances**.

3.1 Methodology

This research consists of a web survey of 14-minute **structured questionnaire** created by Ethica and Toluna, two companies specialised in market research and communication analysis, one based in Italy and the other one, in the UK.

The survey targeted a **general population of 18-65 years old**, further broken down into groups by area, gender and age in each of the countries involved. The sample size consisted of **1,000 cases for each of the five countries involved: Italy, Spain, France, Germany and Poland**. The data were weighted by gender and age of each country in order to represent the weighting of each within the five countries involved. There was a maximum sample error of 3.1% at 95% significance level, indicating strong internal validity and reliability.

In the questionnaire, the multiple, pre-coded questions were first collected as open questions in a pilot phase of 200 cases in Italy. Participants could respond freely in this phase. Then, to make participation easier and collect more feedback, the answers collected in the pilot phase were pre-coded, always leaving the option 'Other', followed by 'Specify'.

Before delving into the survey's areas of investigation, it is imperative to highlight its key premises. The collected data were weighted in order to maintain the proportions between the various populations and thus be able to project them to a certain extent on the whole of Europe. Significant percentage differences between countries emerge relatively often, suggesting different knowledge gaps or current sensitivities. These presuppositions are useful to be able to constructively face and communicate the topics discussed as comprehensibly as possible to the general public. As mentioned, the response percentages obtained for the various questions in the different countries sometimes show significant differences. But it is important to note that these differences rarely led to large variations in the rankings between the questions. In other words, the first response in one country is almost always the first response in all the others.

The fact that very few of the responses requesting improvements in labels fall below 30% indicates that **multiple points are currently still unclear for European consumers**: the information given to date is appreciable but can be improved upon in terms of greater clarity and transparency. Product freshness and its edibility, indicated by the expiry date, and the presence of all-natural or, on the contrary, non- natural ingredients, are the issues that most reassure European consumers, and for which they demand a clear presence on the label.

3.2 Areas of investigation

The questionnaire focused on three key, overarching areas of investigation: **Labelling and Packaging, Natural vs Non-Natural, and Legislation**. Within these main topics, some questions addressed issues and perceptions related to Genetically Modified Organisms (GMOs), vitamins, and vegan products.

4. Key findings

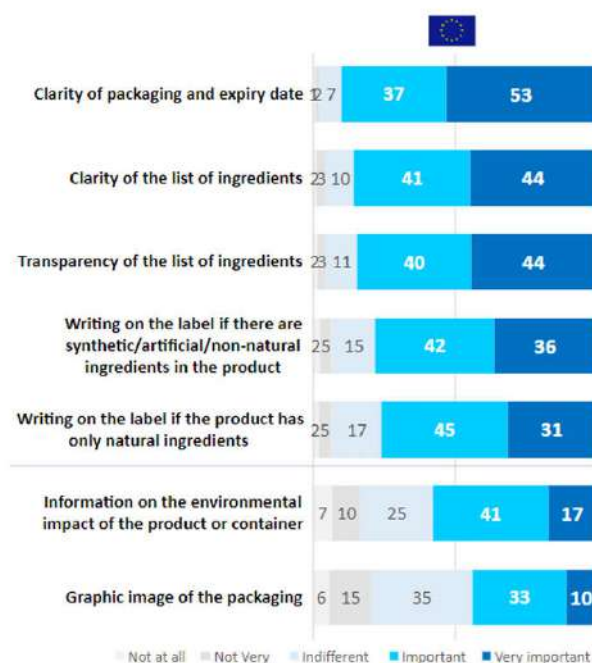
This chapter highlights the key findings emerged from the survey. Results are divided according to the three main areas of investigation, namely Labelling and Packaging, Natural vs Non-Natural, and Legislation. Each section of the following chapter presents in detail the responses given by European consumers from 5 pilot countries, i.e., Italy, Spain, France, Germany and Poland. The overall conclusions can be found in the following chapter of this report.

4.1 Labelling and packaging

Among the main areas of investigation, the survey focuses on the issue of **labelling and packaging**, with the aim of assessing the importance that consumers give to reading labels and packages, and their perception of the clarity and transparency of the information presented on such food labels and packages.

Overall, the survey's respondents consider the **most important factors when buying a food product** to be '**clarity on packaging and expiry date**', with 90% of the respondents deeming it Important and Very Important, followed by '**clarity of the ingredient list**' and '**transparency of the ingredient list**', with respectively 85% and 84% of responses between Important and Very Important. Matters concerning the '**non-naturalness**' or '**naturalness**' of the ingredients were considered slightly less important, with values between 76% and 78%. The presence on the label of '**information regarding the environmental impact of the product or container**' is instead lower in this ranking, but still garners a 56% importance rating.

Q: When buying a food product, how important is:

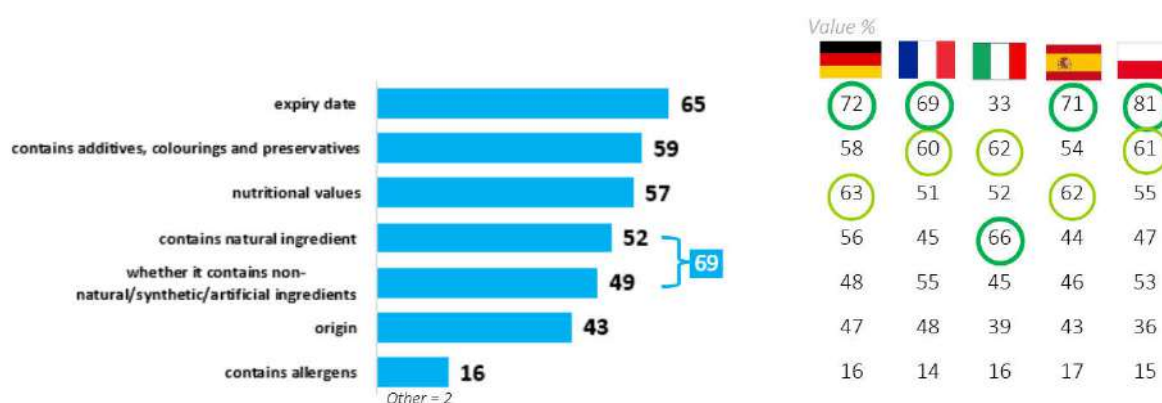


When specifically assessing the consumers' attitude towards labels, the survey revealed that **labels are read on average 4.9 times out of 10**. According to European consumers, the main **advantage** of reading labels lies in '**knowing the origin of products and the expiry date**' (68%), followed by '**understanding the ingredients**', including the '**presence of non-natural ingredients**' (63%) and by '**understanding the food products' nutritional values**' (59-60%). Among those who do not read the labels, 53% of the sample claims that it is not needed

because they have been *'purchasing the product for a long time'* and thus trust it. On the other hand, **29% of the participants avoid reading labels because they *'shop in a hurry and do not have enough time'***, while 26% find them ***'too complicated to read'***. Among the pilot countries where the survey was conducted, **national differences** have emerged: while in Italy 1 in 3 respondents reads labels at least 8 times out of 10, in both France and Germany, 24% of respondents read them 1-2 times out of 10. Moreover, 29% of German participants find it pointless to read them, while this percentage lowers to 13% in Italy and 19% in Spain.

The **most important label's component** that consumer look at when purchasing a food product is the ***'presence of natural ingredients'*** (52% of mentions) and of ***'non-natural ingredients'*** (49%), which were assessed as the most relevant element by 69% of respondents overall. Consumers also pay attention to the ***'expiry date'***, which is considered the most influential factor by an average of 65% of respondents. However, there are wide variations among pilot countries: while 81% of Polish participants deem the expiry date as the most important element, only 33% of Italians consider it as the most relevant factor, with 66% of the Italian sample prioritising the presence of natural ingredients. Slightly less relevant components are the ***'presence of colouring, additives and preservatives'*** (59%) and ***'nutritional values'*** (57%), while the least important factors are the ***'origin'*** of a product (43%) and ***'allergens'*** (16%).

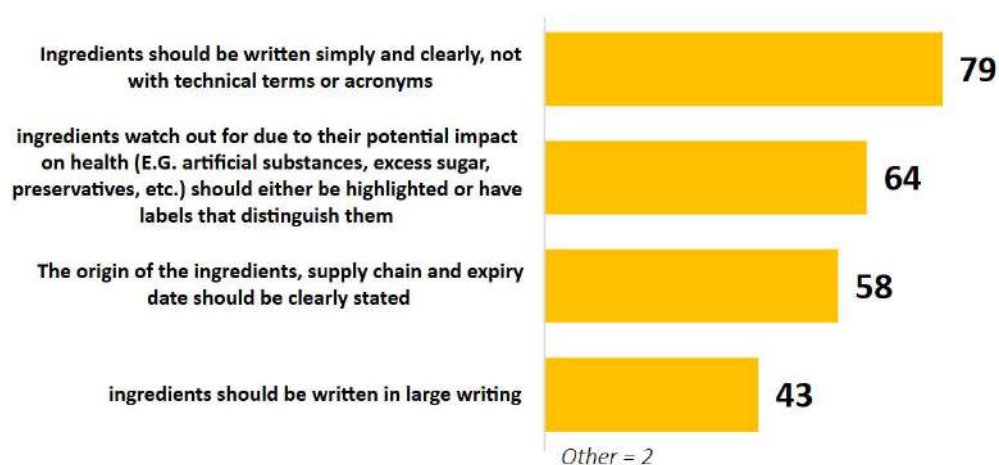
Q: When reading the label of a food product, what do you pay most attention to?



When looking at the historical trend, the survey shows that 90% of respondents are **more interested in reading labels today than they were 3 years ago**, proving that consumers' willingness to make informed choices is on the rise. Those who are more interested in reading labels explain this change by a ***'greater awareness in general'*** (52%), due to both ***'personal growth'*** and ***'awareness of problems caused by certain ingredients'***, as well as the increased attention paid to their ***'lifestyle and improved well-being'*** (47%). The ***'environmental impact'*** of products and packages (32%) and the ***'origin'*** (27%) were much less cited factors.

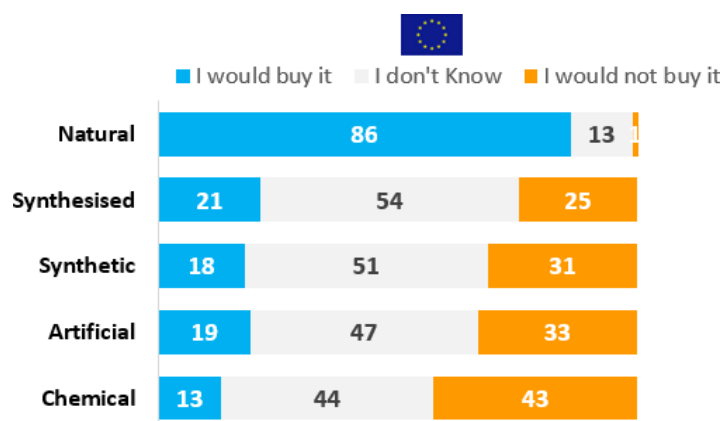
Despite the increased attention paid by consumers to food labels, there is **little trust in the truthfulness and completeness of the information** provided on labels by manufacturers. On average, 2 out of 3 respondents ***'do not believe that food labels present transparent and complete information'***, with 78% of French respondents claiming that they do not trust the information presented on labels. Indeed, only 56% of Europeans consider the information displayed on labels as comprehensible. To improve consumers' understanding of labels, respondents suggest that information should be presented ***'without any overly technical terms or acronyms'*** (79%), and that ***'substances that are potentially harmful for our health should be highlighted'*** (64%), with a particular mention to the need to write more clearly ***'additives, colourings and preservatives'*** (69%) and ***'artificial and synthetic products'*** (65%).

Q: What should be written on a label to ensure that the information is clear and understandable to everyone?



In another question about the **importance of specifying the presence of certain ingredients**, consumers demanded for clearer information regarding the presence of **'natural ingredients'** (89%) as well as **'non-natural ingredients'**: chemical, artificial, synthetic and synthesised (86%). Consumers have indeed shown to give particular **importance to natural ingredients**: 86% of the sample would purchase a product whose label specifies that its ingredients are natural, while 2 in 3 Europeans read labels in search of non-natural ingredients before buying a product.

Q: Would you buy a food product whose label specifies that one or more ingredients are:

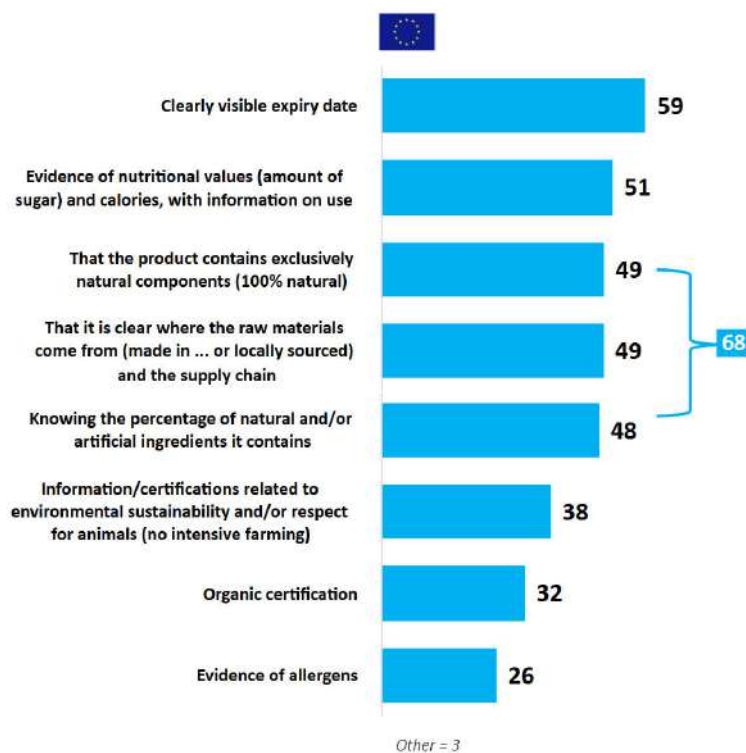


Overall, consumers' perception of **untruthfulness** or **lack of transparency** in a label is mainly caused by the **'long lists of ingredients in small font'** (35%) and the **'use of technical or scientific terms'** (15%). Contrary to other European countries (11%), Italians also mistrust labels when they display **'generic descriptions of ingredients and origins'** (22%). Consumers' mistrust is also particularly high with regards to **ethical and ecological claims**: 79% of respondents do not believe in claims such as **'carbon neutral'**, **'CO2 Neutral'**, **'70% fewer CO2 emissions'**, etc. **When asking the most critical respondents to choose between two possible solutions that can be implemented through legislation to improve the situation, 71% called for 'more serious controls', and only 49% for the 'establishment of certifications for companies', further showing distrust of corporate self-certification systems.**

When asked if '*national, European and global institutions should adopt regulations to make labels more transparent*', 89% of the sample responded 'yes'.

With regards to food **packaging**, the **reasons to buy a product** vary by country. Overall, a '**clearly visible expiry date**' is the most important aspect among Europeans (59%), although there is a stark difference between Polish (70%) and Italian respondents (44%). This is followed by '**nutritional values, calories and use information**' (51%), '**100% natural product**' claim or a product with a '**clearly indicated origin of the raw materials**' (both 49%), and knowledge of the '**percentages of both artificial and natural ingredients contained**' (48%). However, if we combine the responses '100% natural components' with 'percentage of natural or artificial ingredients', the topic of natural versus non-natural content impacts 68% of respondents, thus moving into first place in the European ranking.

Q: What information found on the label of a food product package would make you decide to buy it?



On the other hand, the main **reason for not purchasing a product is 'the absence of the expiration date' (66%)**. However, there are significant differences among pilot countries, ranging from 84% in Poland to 44% in Italy. For almost half of the sample (47%), the 'absence of precise indications on the presence of non-natural substances, either as ingredients or as additives, colourings, etc.', could be a reason not to buy a food product. In third place, 42% of respondents indicated that they would not buy a product if it fails to 'indicate nutritional values'. As for the labels, less prominent reasons to purchase a food product are the 'origin of the ingredients' (39%) and the 'presence of allergens' (19%).

Lastly, it was investigated **whether the type of material used for packaging has an impact on the purchase of the product**. At least half of the sample (an average of 52%) considers the material used for the packaging when buying a product. National differences emerge in this case as well: while 64% of French respondents take the type of material into account, 61% of Germans would purchase a product regardless of the material of its packaging.

Among those who pay attention to the packaging material, 44% would ***'always buy a product packaged in a more environmentally friendly way'***, compared to 29% who would *'only buy it if the intrinsic characteristics of the content were not altered'*. 14% would also be *'attentive to a modest price increase'*, and 13% would *'consider a combination of the latter two factors as a constraint'*.

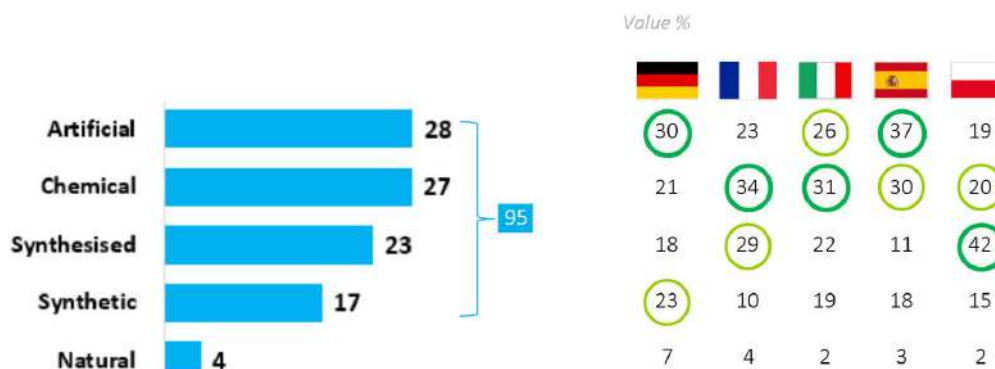
Overall, the survey results show that European consumers **increasingly pay attention to labels and packaging**, and are driven to make more informed choices when purchasing food products. Nevertheless, there is **little trust in the truthfulness, transparency and completeness of the information provided on labels by manufacturers**. Consumers find food labels **too technical and complicated**, struggle to understand whether a product contains **natural or non-natural ingredients** and tend to **distrust ethical and ecological claims**. Consumers call for manufacturers to **improve the readability of labels**, avoiding acronyms, small fonts, overly technical terms and clearly indicating if there are any potentially harmful ingredients, as well as the natural or non-natural origin of the ingredients. **National, European and international institutions are urged to adopt regulations to make labels clearer and more transparent and to set more serious controls on food manufacturers, with the aim of decreasing consumers' mistrust and allowing them to make more informed decisions.**

4.2 Natural vs non-natural

The distinction between the natural and non-natural ingredients of food products constitutes the survey's second main area of investigation, aiming at understanding the meaning that EU citizens give to the terms describing the nature of a substance. Examples of these terms include 'natural', 'vegan', 'chemical', 'artificial' and so on. The survey delves into the EU citizens' perceptions of these terms, investigating which are most clearly understood.

Firstly, 78% of the survey's respondents perceive a product obtained by 'chemical reaction' as 'synthesised' (i.e., non-natural). Looking deeper into these answers, it emerges that 'an ingredient produced by 'chemical reaction' is certainly not considered 'natural' according to the respondents, with only 4% of participants defining it as such. Moreover, 95% of respondents use one of the following four terms to say that an ingredient is not natural: 'Artificial', 'Chemical', 'Synthesised', or 'Synthetic'. It is important to note that there are considerable differences between countries in the use of one or the other of these terms, as can be seen by comparing the national percentages. For instance, 42% of Polish respondents would use the term 'synthesised', against 11% of Spanish participants, while 37% of Spanish and only 19% of Polish respondents would use 'artificial'.

Q: In your opinion, an ingredient produced through chemical reactions is more correctly defined as:

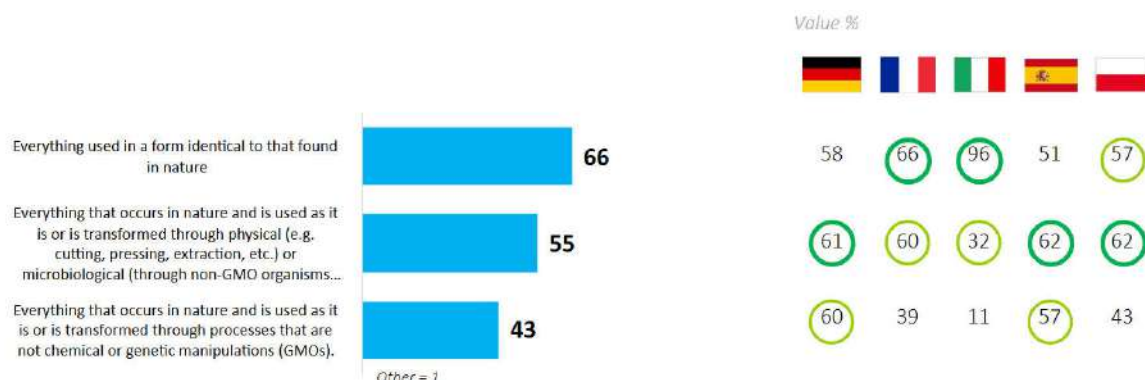


Looking at the definition of *'natural origin'*, 2 out of 3 Europeans believe that ***'a product cannot be called of 'natural origin' if it has undergone a transformation by one or more chemical or synthetic processes'***. Among the five countries involved, Spain, Germany and Italy are tightly in the same range (65%, 66%, 69% respectively), while Poland deviates significantly in a possibilist direction (53%) and France in a much more rigid direction (73%).

Similarly, when asked about the matter of **genetically modified organisms (GMOs)**, 2 in 3 Europeans consider them to be ***'synthesised'***, and therefore **non-natural in practice**, with all countries well over 50% despite considerable differences.

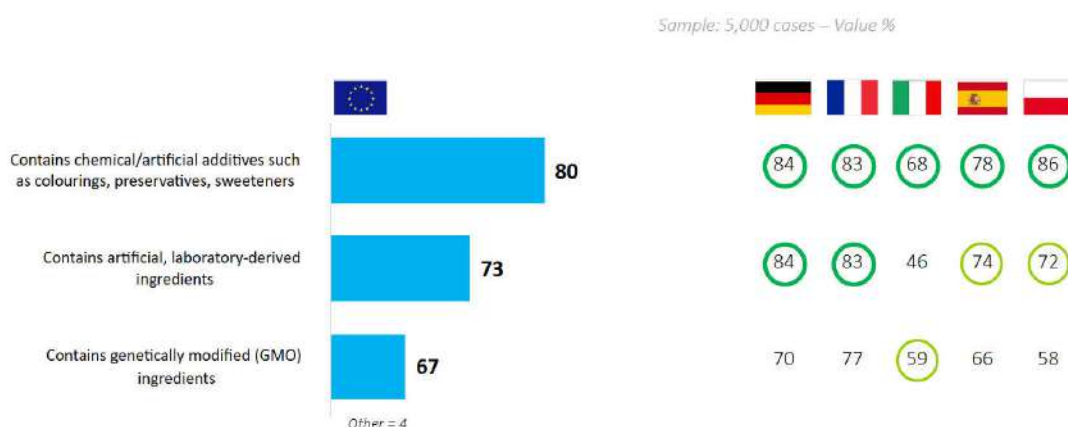
Importantly, 8% of the respondents are convinced that 'physical processes such as heat, extraction, filtration and cutting, which transform an ingredient obtained from naturally occurring substances, such as plants or eggs, still leave the product definable as 'natural''. When asked about the definition of 'natural ingredients', 2 out of 3 respondents (66%) described it as being 'identical to how it is found in nature'. For more than half of the respondents (55%), an ingredient is natural also if it 'underwent physical and microbiological transformations (microbes, yeasts, etc.)'. Lastly, according to 43% of respondents, the definition includes 'everything that occurs in nature and is used or is transformed through processes that are not chemical or genetic manipulations (GMOs)'. However, this third definition is close to the first answer choice in some countries (Germany and Spain), indicating that how to best express the concept has some variability within different national cultures.

Q: What are 'natural ingredients'?



Conversely, 80% of respondents regard **'chemical or artificial additives'** as **'non-natural ingredients'**. Additionally, 73% of participants consider **'artificial ingredients obtained in a laboratory'** as non-natural and 67% find **'GMOs'** non-natural. For 2 in 3 Europeans, **'food ingredients extracted with solvents cannot be called 'natural'**, even if permitted by the current legislation. Even more so, 85% of respondents consider it **'incorrect to call 'natural' products that are a mixture of products they consider 'natural' and 'non-natural'**'. Crucially, it emerges that there is a remarkably high (83%) demand to **'specify whether there are ingredients produced by chemical synthesis that reproduce substances also found in nature'** (i.e., vitamin C). If there is a mixture of 'natural' and 'non-natural' ingredients, 70% of European consumers consider it **'correct to state the percentages on the label for information purposes'**. Only Germany deviates from the other pilot countries (57%), although most consumers demand it. There is more controversy in the case where **'images referring to naturalness'** are used. If there are synthetic products reproducing ingredients also found in nature, the judgement is evenly divided (50% correct and 50% incorrect). However, **'images of the natural form of ingredients that are synthesised (e.g., an orange for vitamin C) should be banned on the packaging'** according to 76% of respondents. Importantly, there was a remarkably high (88%) **'refusal to define plants or meat produced in the laboratory as 'agricultural products'**.

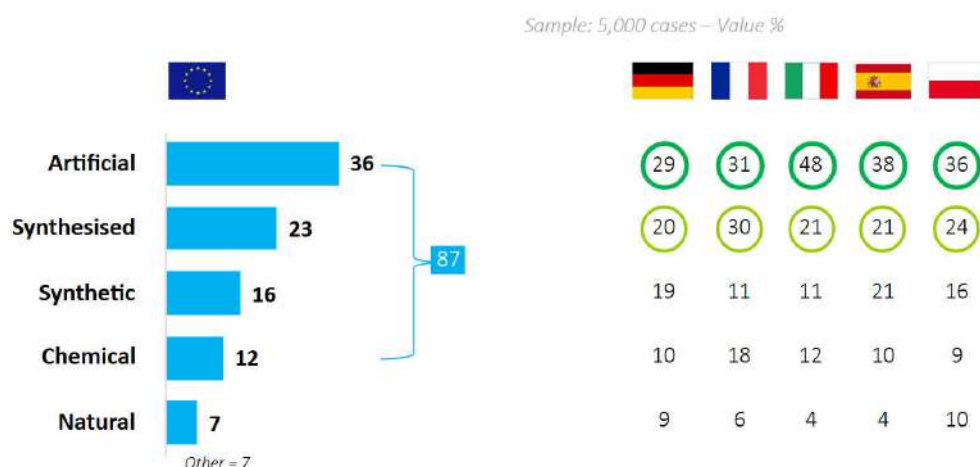
Q: What are 'non-natural' Ingredients?



Focusing specifically on the question to define GMOs correctly, it emerges that 87% of respondents believe that **an ingredient that has been produced by GMOs should be considered 'non-natural'**: artificial (36%), synthetic (16%), synthesised (23%), or chemical (16%). Only 7% of the respondents think it can be correctly defined as 'natural'. There are wide variations between countries on the terms chosen to correctly define GMOs. This ranges from 29% in Germany to 48% in Italy for the term **'artificial'**. Moreover, this is the only question in the research with a 12% of **'other'** response, and always in Germany (as opposed to 5% in the others).

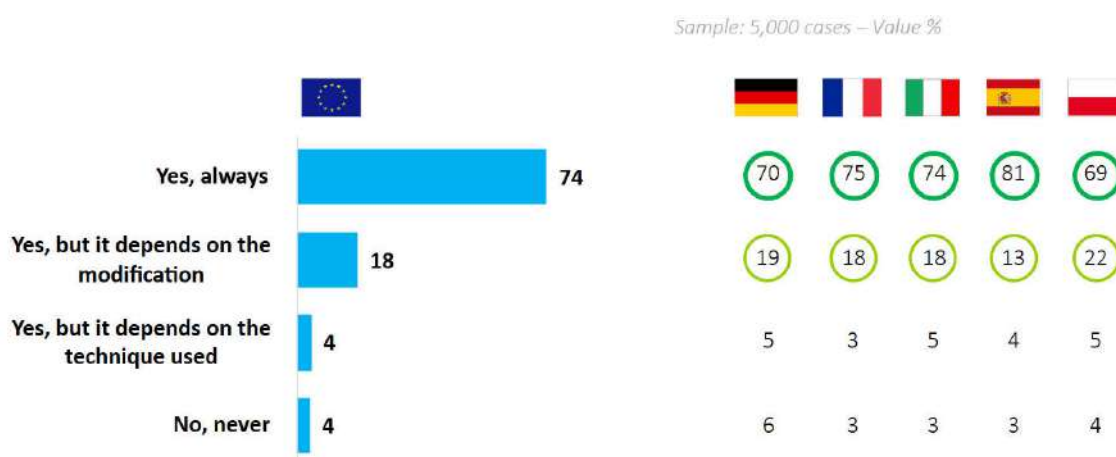
All these responses are synonymous with GMO (e.g., transgenic), which suggests that a **significant share in Germany considers GMOs neither 'natural' nor 'non-natural'**.

Q: In your opinion, an ingredient produced through genetically modified organisms is more correctly defined as:



Moreover, when asking whether *'in the case of the DNA of an ingredient being artificially mutated, it would be appropriate to say that it is always produced by GMOs, never by GMOs, or only if there are more or less than 20 nucleotides of DNA'*, a high number of 'I don't know' (29%) was registered. This percentage differed between different countries, but in each case, indicated a varied but **common level of uncertainty or confusion on the issue**. Yet for more than half of the sample, the most frequently chosen answer, in compact terms and with a large distance from any other alternative, is that *'if the DNA of an ingredient has been artificially mutated, we can 'always' say that it is produced by GMOs'*. Crucially, 74% of the sample believe that ***'if an edible ingredient is produced by a GMO, the fact should be indicated on the label'***. Only 4% responded 'no'. The remainder of the respondents also think this should be indicated on the label, although some specific exceptions may apply. Moreover, **if an ingredient is obtained from a naturally occurring substance and processed through genetically modified micro-organisms**, 68% of Europeans believe ***'it cannot be indicated as being of 'natural origin''*** (Min. 55% in Poland, Max. 74% in Italy).

Q: In your opinion, if an ingredient comes from a plant or animal in which the DNA is artificially modified, does it have to be indicated on the label?



A similar belief applies to the **presence of vitamins** in food products. 65% of the Europeans surveyed believe that they are of **synthetic (therefore non-natural) origin**, with a maximum variation of 10 points between countries. However, this **awareness does not prevent the purchase of products containing synthetic vitamins**, as shown

by the size of the market for **vitamin food supplements**. An example would be **melatonin**, a substance often used and advertised in products that help sleep '*naturally*': the majority (64%) of European citizens consider it '**non- natural**', i.e., of synthetic origin. There are national differences in this case as well, ranging from 77% for Germany to 65% for France¹. Overall, there is quite an aligned belief across Europe, standing at 80%, that '*labels do not indicate whether the vitamins they contain are 'Natural' or 'Synthetic'*'. **According to 83% of European consumers, it is 'important to be able to read on labels whether the vitamins contained are of 'natural' or 'synthetic' origin'**. If we consider the example of the vitamin supplement market, this finding is a simple **call for transparency**. It is basically as if European consumers were saying: '*I already know that they are synthetic, I just don't want it to be hidden from me*'. This represents a crucial message for policymakers which should not be ignored.

Q: How important is it for you to have labels indicating whether vitamins are natural or synthetic?



Overall, these key findings show that **most European citizens and consumers often do not view certain processes as 'natural', even though the current legislation does. There is at least an information gap on this topic, but also a legislative gap that needs to be addressed.** This is primarily to ensure **transparency and clarity** for all citizens, leading to more informed purchasing decisions. Despite this, it is widely known that several products contain both natural and artificial ingredients, although these are not yet listed on the labels. **The origin of each ingredient should be clearly displayed** on food labels to properly inform consumers. This information is crucial for consumers to make informed choices, as **ingredients obtained entirely through chemical synthesis should be labelled as 'synthetic'**. Without accurate labelling, consumers cannot be aware of products containing synthetic ingredients, and thus cannot make an informed choice. The next section delves deeper into this legislative gap.

¹ NB: the value for Italy cannot be compared because the question was different from the one asked in all the other countries.

4.3 Legislation

Current EU Regulatory Landscape on Labelling, Packaging and Natural Products

The European Union has established a **comprehensive regulatory framework governing food packaging and labelling** to ensure consumer protection, food safety, and fair competition across Member States. The fundamental goal of this framework is to provide **clear, accurate, and transparent information** on food labels, empowering consumers to make informed decisions. However, despite these regulations, the use of the term *'natural'* remains a significant challenge due to the **absence of a harmonised definition**. This lack of clarity has resulted in a widespread use of the term, often leading to consumer confusion and mistrust.

The EU's food labelling regulations, such as the *Regulation (EU) No 1169/2011 on the provision of food information to consumers*, mandate that **labels should not mislead consumers**, particularly regarding the nature, identity, properties, composition, and origin of food products. However, the term ***'natural'*** is **frequently used without consistent criteria**, contributing to **misleading claims**. This regulatory gap is problematic as consumers increasingly prioritise naturalness in their purchasing decisions, yet they face difficulties understanding what *'natural'* truly means on food labels.

Gaps Under the Current Legislation

The primary gap in the current EU legislation is the **lack of a clear, unified definition of the term *'natural'*** when applied to food products. This ambiguity allows food producers to use the term with varying interpretations, leading to potential misrepresentation and consumer deception. Additionally, current regulations do **not adequately address the distinction between *'natural'* and *'non-natural'*** ingredients, nor do they require detailed information on the processes that affect the natural status of a product, such as chemical or synthetic modifications.

Therefore, there is a need for providing a **clear definition of *'natural'* in the EU legal framework**, as it is currently only generically mentioned in different pieces of legislation. For instance, the *REACH Regulation* only provides a general definition of *'substances that occur in nature'*, while the *Regulation on nutrition and health claims made on food* indicates that a product can be labelled as natural when it fulfils the conditions for the use of a nutritional claim, focusing on providing information on the quantities of nutrients present in food. The only remaining reference comes from the *Regulation on flavouring and certain food ingredients with flavouring properties*, explaining that even if the main component of a food product is of natural origin, **artificial compounds can still be added as excipients, additives, and preservatives**. Consequently, the product can **no longer be considered truly natural**, nor can it guarantee the absence of synthetic substances in the final product. These different regulations together still do not provide a **single, comprehensive, and straightforward definition**, failing to address the already prevailing confusion among European consumers, as the survey has clearly shown.

The current legal framework's uncertainty **prevents consumers from effectively differentiating and identifying food components in products**. The absence of mandatory information about ingredient origins, coupled with the lack of a clear definition of *'natural'* for food products, results in ***'natural'* labelled products containing chemical ingredients hidden behind vague terms**. These factors hinder consumers from accurately assessing whether claims like *'100% natural'* or *'only natural ingredients'* truly reflect the product's characteristics. We identified the following criteria for a more comprehensive understanding of natural:

- **Nature of the components of the product:** a product considered natural should only consist of natural ingredients, without any synthetic substances.

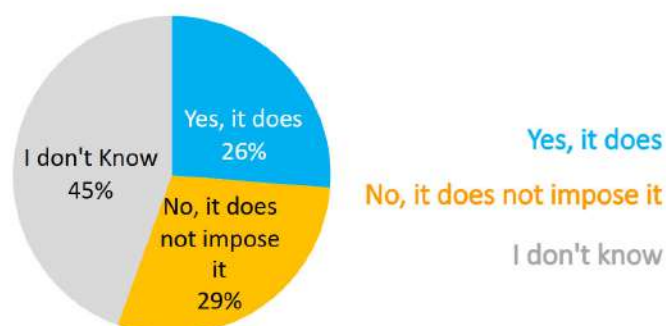
- **GMOs not allowed:** a natural product should not contain, or be obtained by, genetically modified organisms.
- **Biodegradable condition:** a natural product should be 100% biodegradable.

In the current situation, the *Regulation No 1924/2006 on nutrition and health claims* recognises that using nutrient profiles as a criterion help to understand the overall nutritional status of a food product, preventing claims which could mislead consumers trying to make healthy choices within a balanced diet. The Regulation further states that nutrient profiles guide the conditions under which claims can be made. These are important aspects that should be further complemented by a suitable definition of the term '*natural*' as shown above. Consequently, to properly inform consumers about ingredient origins and prevent the misuse of the term '*natural*' on food packaging, we urge the European Commission to develop a clear definition of '*natural*'. This definition should be incorporated by **amending the existing definition of '*natural/naturally*' in the Annex of Regulation No 1924/2006 on nutrition and health claims made on food.**

This amendment would ensure consistency and uniformity with other EU Regulations, as highlighted in paragraph 38 of *Regulation 1169/2011 on food information to consumers*, which states that the voluntary inclusion of nutrition or health claims on food labels should align with *Regulation No 1924/2006 on nutrition and health claims made on foods*. This survey has provided the data and has already shown the need for such an amendment, which would at least start addressing the widespread confusion among European consumers. Most importantly, this would **answer their calls for better clarity and transparency**. Ultimately, the aim is to protect consumers in line with the objectives of the Farm to Fork Strategy and the Green Deal.

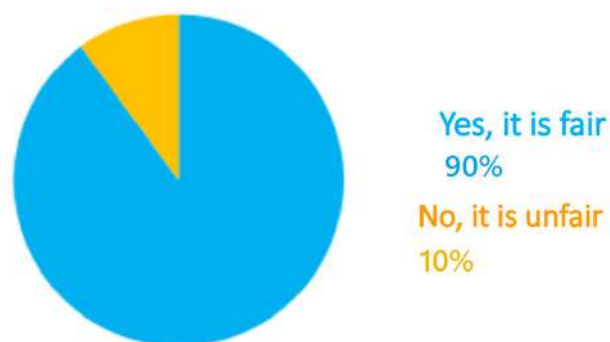
The survey conducted by Ethica highlights these issues, showing that **consumers are increasingly aware of and concerned about the authenticity of the '*natural*' label**. The findings reveal a strong demand for more **transparent and truthful labelling**, particularly regarding the natural or synthetic origins of ingredients. 3 in 4 survey respondents, with only Poland deviating slightly from the rest, believe it is **'impossible to tell whether an edible product contains non-natural ingredients or not'**. When questioned about whether the current legislation **mandates the labelling of non-natural substances**, respondents displayed significant uncertainty. While 26% thought it was required, 29% believed it was not, and nearly half (45%) were unable to form an opinion on the matter.

Q: Do you think that the current legislation requires those who use synthetic/synthesised/artificial substances to write this on the label?



According to an overwhelming majority (90%) of European citizens, it is '*fair that the **legislation requires to write on the label if one or more synthetic/synthesised/artificial substances is used***'. Moreover, for 85% of Europeans, indicating whether ingredients are '*natural*' or '*non-natural*' on the label would be important in facilitating the green transformation.

Q: In your opinion, is it fair or unfair that the legislation requires writing on the label if one or more synthetic/synthesised/artificial substances is used?



Policy Recommendations

To address these gaps, the EU should consider the following policy recommendations:

1. **Enhance Label Transparency:** Labels should clearly indicate whether a product contains natural or synthetic ingredients, and any processes that may affect the naturalness of the product should be explicitly stated. This includes requiring percentages of natural and non-natural ingredients when a mixture is present.
- ff. **Strengthen Regulatory Oversight:** To restore consumer trust, the EU should implement stricter controls and verification mechanisms to ensure that food labels accurately reflect the content and claims made. This could involve more rigorous inspections and penalties for non-compliance.
- k. **Promote Consumer Education:** The EU should also invest in public awareness campaigns to educate consumers on what the term '*natural*' means within the context of food labelling. This would help mitigate confusion and empower consumers to make more informed choices.
4. **Mandate Clearer Environmental Claims:** Regulations should also require that ethical and environmental claims, such as '*carbon neutral*', be substantiated with clear, verifiable data. This would help prevent greenwashing and ensure that such claims contribute to transparency rather than confusion.

By addressing these gaps and implementing these recommendations, the EU can **improve the clarity and reliability of food labelling, thereby enhancing consumer protection and trust in the food supply chain.**

5. Conclusions

One of the primary revelations of the study is the paramount **importance consumers place on clarity and transparency** of food labels. An overwhelming 90% of respondents highlighted the necessity for **clear packaging and expiry dates**. Additionally, 85% stressed the importance of having a **clear ingredient list**, while 84% valued **transparency** in the ingredient list. These findings indicate that European consumers are keen on **knowing exactly what they are consuming and until when it is safe** to be consumed.

Despite the **high frequency of label reading**, there are notable national differences. Italians lead with 1 in 3 consumers reading labels almost every time they purchase food, followed closely by Spaniards and Poles. Conversely, Germans and French consumers show lower engagement with food labels.

The motivations behind reading food labels are diverse yet centered around health and safety. A significant 68% of consumers read labels to focus on the **origin and expiry date** of products, while 63% are keen on identifying **non-natural ingredients**. Moreover, 59-60% of participants are interested in understanding the **nutritional values** of their food, underscoring a widespread desire for healthier eating habits.

However, not all consumers are diligent label readers. Approximately 29% of Europeans consider themselves to **shop too quickly** to read labels, with this percentage reaching nearly 40% in France and Poland. Additionally, 26% of respondents find labels **too complicated to understand**, especially the more informative sections, and 24% believe that reading labels does not significantly alter their purchasing decisions. Notably, half of the survey participants do not read labels of the products they regularly buy because they **trust the brand**.

Trust, or rather the lack of it, is a significant issue highlighted by the research. Only 33% of respondents believe that food companies provide all the necessary information on labels. **This skepticism is particularly pronounced in France, where nearly 80% of consumers doubt the completeness and transparency of food labels.** To build trust, consumers expressed a strong **desire for clearer statements regarding health-impacting additives and the presence of artificial ingredients**: being that consumers well know that these ingredients are often present in food, this desire is not to “ostracize” the product or brand, but to be clearly and honestly informed.

Environmental concerns also play some role in consumer decisions. The **type of packaging material** is a consideration for 52% of respondents, with 44% always opting for eco-friendly packaging. This preference reflects the broader trend towards sustainability, with these consumers willing to support environmentally responsible practices.

The study also explored perceptions and understood meaning of **‘natural’ versus ‘non-natural’** ingredients. For two-thirds of EU consumers, an ingredient is deemed **‘natural’** if it is **identical to its natural form**, has undergone **physical or microbiological transformations**, or has **not been chemically or genetically modified**. Conversely, **‘non-natural’** ingredients are seen as those **containing chemical additives, artificial laboratory-derived components, and GMOs. An ingredient produced by chemical reaction is certainly not considered ‘natural’ by the European public** (only 4% would define it as such), and over half of the participants (57%) believe that an ingredient with artificially mutated DNA should always be considered a GMO and only 7% of the participants consider GMOs to be **‘natural’**. Over half of the participants (57%) believe that an ingredient with artificially modified DNA should always be considered a GMO; moreover, 87% think GMO ingredients should be labeled as non-natural, highlighting a clear demand for transparency in this area.

Overall, the research underscores a significant **demand for clearer, more transparent food labels** among European consumers. The EU legislation should therefore take into consideration the concerns expressed by European consumers, by **simplifying language** on labels whenever possible, clearly indicating the **presence of health-impacting substances**, and **enhancing trust in the information provided** by food companies. There is also a **preference for natural ingredients and eco-friendly packaging**, reflecting broader trends towards better health consciousness and environmental sustainability.

To address consumers' concerns regarding food labelling, SAFE urges the EU to consider several key policy changes. Labels should also be **more transparent**, explicitly **stating whether ingredients are natural or synthetic**, and providing clear percentages in mixed products. **Strengthened regulatory oversight** is needed to ensure label accuracy, through stricter inspections and penalties for non-compliance. Additionally, the EU should focus on **educating consumers** about the meaning of '*natural*' in food labelling, helping them make informed choices. Finally, **environmental claims** like '*carbon neutral*' should be backed by **clear, verifiable data** to prevent misleading claims and ensure transparency. Improving label information is not just about compliance; it is about empowering consumers to make healthier and more informed choices.





SAFE Food Advocacy Europe

Rue du Taciturne 50, 1000 Brussels

info@safefoodadvocacy.eu

www.safefoodadvocacy.eu



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