

June 28, 2018

Rodney McMullen
Kroger
1014 Vine Street
Cincinnati OH, 45202

Dear Mr. McMullen,

On behalf of the undersigned organizations, which represent millions of customers, sustainable and responsible investors, and other stakeholders, we are urging the food retail sector to put pesticides at the top of its sustainability agenda. **We urge your company to signal its dedication to protecting the health of people, pollinators and the planet by phasing out the use of toxic pesticides in its supply chain, prioritizing the pesticides chlorpyrifos, neonicotinoids and glyphosate, and by increasing the percentage of organic food offerings in its stores, with a focus on sourcing from domestic producers.** This issue has only become more critical since our initial June 2016 letter.¹

Food retailers face both reputational and supply chain risks for failing to address the overuse of agricultural pesticides.² A growing body of evidence demonstrates that pesticides are harming human health, soil health, water quality, and biodiversity — including pollinators, fish and aquatic organisms and other organisms critical to the long-term sustainability of our food system.^{3, 4, 5, 6, 7} Pesticides are having “catastrophic impacts on the environment, human health and society as a whole,” according to a recent UN report that debunks the myth that pesticides are necessary to feed a growing world population.⁸

A large body of peer-reviewed studies connects human pesticide exposure with a host of adverse health impacts, from cancers and Parkinson’s Disease to neurodevelopmental and reproductive disorders.^{9,10, 11,12, 13,14} Pregnant women, infants and children are among the most vulnerable to pesticide exposure.^{15, 16} According to Dr. Fernando Stein, president of the American Academy of Pediatrics, “Extensive epidemiologic studies associate pesticide exposure with adverse birth and developmental outcomes, including preterm birth, low birth weight, congenital abnormalities, pediatric cancers, neurobehavioral and cognitive deficits, and asthma. The evidence is especially strong linking certain pesticide exposure with pediatric cancers and permanent neurological damage.”¹⁷

Pesticide residues on food have increased since 2010, according to the latest data from the U.S. Food and Drug Administration (FDA).¹⁸ Samples of fruits and vegetables showed the highest frequency of pesticide residues — approximately 82 percent of domestically-grown fruits and 62 percent of vegetables carried residues of weed killers, insecticides and other pesticides.¹⁹

Pesticides are a key driver in the decline of invertebrate pollinating species, 40 percent of which are on the brink of extinction.²⁰ Pollinators are the “canaries in the corn fields” — the decimation of bee and butterfly populations associated with the rampant use of toxic pesticides warns us that something is fundamentally wrong with our farming systems.²¹ A new report by the Cambridge Conservation Initiative found that a dramatic decline in the number of pollinators, such as bees and butterflies, could lead to many companies facing potential shortages of raw materials, a fall in crop quality and challenges around security of supply because of an emerging pollination deficit.²²

We need a two-fold approach to protecting human health, agricultural workers and our environment from toxic pesticides. We must simultaneously expand organic farming while reducing pesticide use on non-organic farms. Specifically, we urge your company to phase out the use of chlorpyrifos, glyphosate and neonicotinoids in its supply chain.

Pesticides of Concern

Chlorpyrifos is a toxic nerve agent that threatens the survival of bees and other pollinators^{23, 24} and is likely to harm approximately 1,800 plants and animals, many of them critically endangered, including species of wild bees.²⁵ A large body of science, including the U.S. Environmental Protection Agency's scientific review, demonstrates that chlorpyrifos residues in water and on food are unsafe for pregnant women and children.²⁶ Chlorpyrifos is associated with higher rates of learning disabilities, reduced IQ, loss of working memory, attention deficit disorders and delayed motor development.^{27, 28, 29} It is widely applied in the production of fruits, vegetables, nuts and other conventionally grown crops.³⁰

Farmers, farmworkers and rural communities are at increased risk of exposure; agricultural use of chlorpyrifos is associated with immediate and long-term adverse health impacts for those who are exposed.^{31, 32, 33, 34, 35}

Chlorpyrifos is so dangerous that the EPA recommended a ban all food tolerances of this pesticide in 2015.³⁶ However, that decision was reversed by EPA Administrator Scott Pruitt.³⁷ In response, numerous state attorneys general have filed a lawsuit against the EPA over the reversal, and the state of Hawaii just passed a bill banning chlorpyrifos.^{38, 39} The science is clear that chlorpyrifos is unsafe for people and the environment and food retailers should stop selling food grown with this pesticide.

Glyphosate is the most widely-used herbicide in the world.⁴⁰ Use of glyphosate has increased dramatically in recent years from 11 million pounds applied on farms in 1987 to nearly 300 million pounds today.⁴¹ The U.S. Geological Survey routinely finds glyphosate in U.S. waterways, including those that serve as sources of drinking water.⁴² The rapid increase in the use of glyphosate on crops located along the monarch butterfly's migration route has virtually wiped out milkweed — the only food young monarch caterpillars eat.⁴³ In the past 20 years, the monarch butterfly population has declined by 90 percent.⁴⁴ Today, experts estimate that monarch butterflies would need nearly a fivefold increase to return to a stabilized population.^{45, 46}

Glyphosate was classified as a probable human carcinogen in 2015 by the International Agency for Research on Cancer (IARC), a respected body of independent experts.⁴⁷ Several European countries are moving to limit the use of glyphosate.^{48, 49} and more than 4,000 people are suing Monsanto for non-Hodgkins lymphoma that may be associated with exposure to RoundUp® herbicide in which the active ingredient is glyphosate.⁵⁰

Neonicotinoids are the world's most widely-used class of insecticides, they are used on over 140 crops.⁵¹ A growing body of science identifies agricultural use of neonicotinoids as a key factor in recent declines of pollinators and other beneficial organisms essential for natural pest control and sustainable food production, including birds, bats, butterflies, dragonflies, lacewings, ladybugs, earthworms, small mammals, amphibians, aquatic insects and soil microbes.^{52, 53, 54, 55, 56, 57, 58, 59, 60} The "second silent spring" associated with rising use of neonicotinoids puts food production and the environment in jeopardy.⁶¹ The Task Force on Systemic Pesticides, a global body of independent scientists, concluded that neonicotinoids represent a major worldwide threat to biodiversity and ecosystems and called for an immediate stop to agricultural uses of systemic pesticides.⁶²

In addition, there is evidence that neonicotinoids may be associated with adverse developmental health outcomes, including congenital heart defects, neural tube defects, and autism spectrum disorder.⁶³ Research also indicates that neonicotinoids are potential endocrine disruptors and may alter estrogen levels in humans.⁶⁴

In response to growing scientific concern, the European Union recently voted to ban all outdoor uses of neonicotinoids.⁶⁵ In the U.S., more than 200 businesses, states, cities, universities and federal agencies have taken steps to restrict the use of neonicotinoids.⁶⁶

Environmental and Health Benefits of Organic

The science is clear that organic farming is essential to a healthier food system for all: for our health, our families and our communities; for the farmers and farmworkers who grow our food; for the land that provides us with nourishment; and the ecosystems that sustain all of life.^{67, 68}

Organic certification prohibits the use of neonicotinoids, glyphosate, chlorpyrifos and many other toxic pesticides.⁶⁹ While non-organic farmers are allowed to use more than 900 synthetic pesticide products, organic farmers have restricted access to just 25 least-toxic alternatives.⁷⁰ Organic farms support up to 50 percent more pollinating species than conventional farms, help other beneficial insects flourish and foster biodiversity.^{71, 72}

Organic farming protects the health of consumers, farmers, farmworkers and rural communities by eliminating the use of highly toxic pesticides.⁷³ Agricultural workers, among the highest percentage of U.S. workers affected by chemical exposures, are less at risk for occupational exposures to harmful pesticides when working in organic food production.^{74, 75} Organic farming systems are also more profitable for farmers and boost local economies.⁷⁶ One study found that in U.S. counties with high levels of organic production, median household incomes are higher and poverty levels are reduced.⁷⁷

State of the Industry

In recent years, supermarkets and food companies have announced new purchasing policies and commitments regarding organic food and pesticide reduction. However, a report and scorecard issued by Friends of the Earth in March 2018, *Swarming the Aisles II: Rating Top Retailers on Pesticide Reduction and Organic Food to Protect Pollinators* shows that pesticide reduction lags far behind other sustainability and social responsibility efforts in the retail sector.⁷⁸ The report found that 20 out of 25 top food retailers are failing to take steps to protect pollinators and people from toxic pesticides, and only six companies have clearly stated their intent to expand organic offerings in the future: Albertsons, BJ's Wholesale Club, Costco, Target, Walgreens and Whole Foods.⁷⁹

Taking action on pesticide reduction and organic expansion will reduce systemic risks threatening our food system and economy and align retailers with growing consumer demand for food that is healthy for their families and the environment.⁸⁰ Fifty percent of Americans report being concerned about chemicals in their food, and 48 percent are concerned about pesticide residues.⁸¹ Consumers cite avoiding pesticides and protecting the health of themselves and their children as the top two reasons to purchase organic.⁸² In a recent Natural Grocers survey, 90 percent of organic consumers said they choose organic food "to avoid pesticides."⁸³

The trend is clear. In store aisles, people are reading food labels; they are asking questions of their grocers; they want to know where and how their food was grown.^{84, 85} They want to be assured that they are not eating a dose of pesticides every time they consume a "healthy" salad for lunch, taste a sweet strawberry or enjoy a delicious peach.⁸⁶ They are channeling their shopping dollars to sustainable agriculture.⁸⁷ Retailers that are responding to this growing trend are at the forefront of meeting consumers' demands.

It is clear we must advance a sustainable food system that protects the wellbeing of people, pollinators and the planet. **We urge your company to signal its dedication to these aims by phasing out the use of toxic pesticides in its supply chain, prioritizing chlorpyrifos, neonicotinoids and glyphosate, and by increasing the percentage of organic food offerings in its stores, with a focus on sourcing from domestic producers.**

Friends of the Earth U.S. and the undersigned organizations request that your company commits to adopt the following policies by the end of 2018:

- **Reduce Pesticides:** Establish a pollinator protection policy that includes phasing out neonicotinoids, glyphosate, chlorpyrifos and other pollinator-toxic pesticides and implementation of alternative, least-toxic pest management strategies along the entire company supply chain.
- **Grow Organic:** Increase USDA-certified organic food and beverages to 15 percent of overall offerings by 2025, prioritizing American farmers.

- **Increase Transparency:** Publicly disclose company policies and progress related to these actions.

We also strongly encourage your company to advocate for public policies aimed at reducing agricultural pesticide use, protecting pollinators and supporting the expansion of organic agriculture in the U.S. These actions will create a more sustainable and resilient food system and will meet growing consumer demand for transparency, health and sustainability. With a focus on American farmers, these actions will bring the benefits of organic and ecological farming home to U.S. farms and communities.

We will continue to educate the public about the state of the food retail industry in relation to pesticide reduction. All companies we contact will be highlighted on our website, in social media and in the press so consumers can see for themselves where each company stands on protecting pollinators and advancing a healthy and sustainable food system.

Please contact Tiffany Finck-Haynes, Food and Technology Program at Friends of the Earth (beeaction@foe.org or 202-222-0715) by July 12, 2018 so that we may discuss your company's current policies and how your company can demonstrate its leadership in corporate sustainability and environmental protection. We would also be happy to answer any questions you might have or provide further information on this topic.

Thank you for your attention to this important matter. We hope to be able to highlight your company as an industry leader.

Sincerely,

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