



October 11th, 2024

Sean M. Connelly
ConAgra Brands
222 W Merchandise Mart Plaza #1300
Chicago, IL 60654

Dear ConAgra Brands President and Chief Executive Officer Sean M. Connelly,

On behalf of the 46 undersigned organizations, which represent millions of customers, sustainable and responsible investors, and other stakeholders, we urge ConAgra to protect the health of pollinators, people, and the planet by phasing out the use of neonicotinoid-coated seeds in its popcorn supply chain.

Thank you for the efforts that ConAgra has already made to address pesticide use in crops such as carrots, peas, sweet corn, green beans, and tomatoes, as well as initiatives to implement conservation practices such as cover cropping and crop rotations in the popcorn supply chain.¹ We encourage ConAgra to build on this foundation by working with popcorn suppliers to end the use of neonicotinoid-coated seeds, which are associated with widespread harm to biodiversity and human health.

Neonicotinoids are a class of insecticides associated with devastating ecological harm. They are one of the main drivers of insect declines worldwide,² and U.S. agriculture has become nearly 48 times more toxic to insect life, including essential pollinators like bees, since the introduction of neonicotinoids in the 1990s.³ They are also associated with harm to birds and aquatic organisms. The EPA asserts that continued use will likely push more than 200 threatened and endangered species toward extinction.⁴

These harms to biodiversity represent a material risk for ConAgra. One in three bites of food we eat depends on essential pollinators, which contribute approximately \$34 billion a year to the U.S. economy.⁵ Food costs are predicted to rise as managed and wild pollinator populations decrease, and research indicates that pollinator loss has already resulted in decreased production of crops like apples and cherries in the United States.⁶ Pollinator declines, fueled by neonicotinoids, present a material risk for corporations in the food sector, including ConAgra.

¹ As reported in ConAgra's 2023 Citizenship Report.

² Sánchez-Bayo, F., & Wyckhuys, K. A. 2019. Worldwide decline of the entomofauna: A review of its drivers. *Biological conservation*, 232, 8-27.

³ DiBartolomeis, M., Kegley, S., Mineau, P., Radford, R., & Klein, K. 2019. An assessment of acute insecticide toxicity loading (AITL) of chemical pesticides used on agricultural land in the United States. *PloS one*, 14(8), e0220029.

⁴ U.S. EPA. 2023. *Imidacloprid, Thiamethoxam and Clothianidin: Draft Predictions of Likelihood of Jeopardy and Adverse Modification for Federally Listed Endangered and Threatened Species and Designated Critical Habitats*. U. S. Environmental Protection Agency: Washington, D.C. May.

⁵ Friends of the Earth. 2022. *Economic Risks of Pesticide Use and Pollinator Declines*. Friends of the Earth: Washington, D.C.

⁶ Friends of the Earth. 2022. *Economic Risks of Pesticide Use and Pollinator Declines*. Friends of the Earth: Washington, D.C.

Neonicotinoids also threaten human health. They have been associated with impacts to the nervous system including memory loss and tremors, and congenital heart and neural tube defects.^{7,8,9} The ongoing use of neonicotinoids, including neonicotinoid-coated seeds, runs counter to ConAgra’s commitment to safeguarding public health. It is also at odds with consumer concerns about health and the environment. Consumers are increasingly seeking healthy and sustainable food options, as evidenced by the steady growth of the organic market; organic retail sales in the U.S. have increased an average of 8% per year over the past decade.¹⁰

Neonicotinoid-coated seeds are widely used in corn despite a lack of evidence of benefits provided. The largest use of neonicotinoids in the U.S. is as coatings on corn and soy seeds, though studies increasingly show that they provide little to no yield or economic benefits to farmers, on average,^{11,12} and that in some cases may even decrease yield by killing pollinators and pest predators (i.e. “good bugs”).^{13,14} We urge ConAgra to work with popcorn suppliers to implement effective, least-toxic pest management strategies in place of ineffective and harmful neonicotinoid-coated seeds.

Policymakers and food companies are increasingly moving to phase out neonicotinoid-coated seeds. A number of states have taken action to restrict neonicotinoids, adopting more restrictive measures than the EPA and recognizing that the regulatory system does not provide adequate protections.^{15,16} Leading food retailers are also moving to address the use of neonicotinoids: Walmart, Kroger, Whole Foods, and Giant Eagle have established pollinator health policies, aimed at reducing the use of neonicotinoids and other harmful pesticides, that require Integrated Pest Management in their fresh produce supply chains. As one of the nation’s largest popcorn providers – with household brands including Orville Redenbacher, Act II, and Angie’s BOOMCHICKAPOP – ConAgra has an opportunity to lead the way on neonicotinoid-coated seeds in the popcorn market in alignment with the broader policy and industry shifts.

To protect pollinators, people, and the planet, we urge ConAgra to:

1. Make a time bound and measurable commitment to eliminate neonicotinoid-coated seeds from its popcorn supply chain.

7 Beyond Pesticides. *Gateway on Pesticide Hazards and Safe Pest Management: Imidacloprid*. Beyond Pesticides: Washington, D.C. Webpage. Accessed July 24, 2024. <https://www.beyondpesticides.org/resources/pesticide-gateway?chemfind=imidacloprid>

8 Beyond Pesticides. *Gateway on Pesticide Hazards and Safe Pest Management: Clothianidin*. Beyond Pesticides: Washington, D.C. Webpage. Accessed July 24, 2024. <https://www.beyondpesticides.org/resources/pesticide-gateway?chemfind=clothianidin>

9 Beyond Pesticides. *Gateway on Pesticide Hazards and Safe Pest Management: Thiamethoxam*. Beyond Pesticides: Washington, D.C. Webpage. Accessed July 24, 2024. <https://www.beyondpesticides.org/resources/pesticide-gateway?chemfind=thiamethoxam>

10 USDA Economic Research Service. *Organic Agriculture*. United States Department of Agriculture: Washington, D.C. Webpage. Accessed September 9, 2024. <https://www.ers.usda.gov/topics/natural-resources-environment/organic-agriculture/>

11 U.S. EPA. 2014. *Memorandum: Benefits of Neonicotinoid Seed Treatments to Soybean Production*. U.S. Environmental Protection Agency: Washington, D.C. October.

12 Gurian-Sherman, Doug. 2017. *Alternative to Neonicotinoid Insecticide Coated Corn Seeds*. Prepared for the Center for Food Safety: San Francisco, CA.

13 Krupke, C.H., Holland, J.D., Long, E.Y., Eitzer, B.D. 2017. Planting of neonicotinoid-treated maize poses risks for honey bees and other non-target organisms over a wide area without consistent crop yield benefit. *Journal of Applied Ecology*. 54: 1449-1458.

14 Douglas, M.R. and Tooker, J.F. 2015. Large-scale deployment of seed treatments has driven rapid increase in use of neonicotinoid insecticides and preemptive pest management in U.S. field crops. *Environmental Science & Technology*. 49: 8, 5088–5097.

15 New York State. 2022. Governor Hochul signs "Birds And Bees" act, nation-leading legislation to protect New Yorkers and wildlife from harmful pesticides. *Governor Kathy Hochul: News*. December 12. Online. <https://www.governor.ny.gov/news/governor-hochul-signs-birds-and-bees-act-nation-leading-legislation-protect-new-yorkers-and>

16 NCEL. *Washington Becomes the 11th State Legislature to Restrict Neonicotinoids*. National Caucus of Environmental Legislators: Washington, D.C. Webpage. Accessed September 9, 2024. <https://www.ncelenviro.org/articles/washington-becomes-the-11th-state-legislature-to-restrict-neonicotinoids/>

2. Work with popcorn suppliers to implement alternative, least-toxic pest management strategies, including a holistic transition towards organic practices.
3. Act with transparency by publicly disclosing company policies, actions, and progress toward these goals.

We also encourage ConAgra to implement the phase-out of neonicotinoid-coated seeds in popcorn as part of a broader effort to transition away from pesticides and advance safer methods of farming like organic agriculture across the entire supply chain.

We would be happy to serve as a resource to your company on the risks of neonicotinoids, and we would be more than happy to meet to discuss the positive actions that ConAgra could take to protect pollinators and more. We look forward to hearing about ConAgra's next steps on this critical issue.

Sincerely,

American Bird Conservancy
Animal Wonders KC
Beyond Pesticides
Center for Biological Diversity
Center for Food Safety
Christian Council of Delmarva
DC Natives
Endangered Habitats League
Endangered Species Coalition
Environment America
Environment Illinois
Environmental Protection Information Center (EPIC)
Ethical And Respectful Treatment of Humans (EARTH)
Family Farm Defenders
Friends of the Earth
GMOScience
Green America
Harris Center for Conservation Education
Hawai'i Alliance for Progressive Action (HAPA)
Howling For Wolves
Kettle Range Conservation Group
Latino Farmers & Ranchers International, Inc.
MA Pollinator Network
Maryland Pesticide Education Network
Massachusetts Pollinator Network
Millions Against Monsanto Toronto
Moms for a Nontoxic New York (MNNY)

Natural Resources Defense Council
New Hampshire Audubon
New Hampshire Network: Energy, Environment, Climate
Northeast Kingdom Waste Management District (NEKWMD)
Northwest Center for Alternatives to Pesticides
NYC Plover Project
Organic Voices
People & Pollinators Action Network
Pesticide Action and Agroecology Network
PIRG (Public Interest Research Group)
Re:wild Your Campus
Right Livelihood Center, UC Santa Cruz
Safe Food Matters Inc.
The Organic Center
Toronto Non-GMO Coalition
Voices of Wildlife in NH
Western Nebraska Resources Council
Wild Farm Alliance
YardSmartMarin