

February 25, 2019

Rodney McMullen
Kroger
1014 Vine Street
Cincinnati OH, 45202

Dear Mr. McMullen,

On behalf of the undersigned consumer, environmental, farmer and farmworker organizations, which represent millions of customers, we would like to alert your company to a recent report that found harmful pesticides in Kroger store brand products and a new peer-reviewed study that demonstrates that an organic diet can rapidly and dramatically reduce pesticide exposure. In addition to these studies, which convey human exposure to pesticides, a recent meta-analysis reports on the devastating impact agricultural pesticides have on insect populations and predicts the “collapse of nature.”¹ **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 organophosphates (including 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 communications in June 2016 and 2017.^{2,3}

This month, new testing conducted by Friends of the Earth in collaboration with fourteen organizations across the country revealed that Kroger’s store brand foods contain toxic pesticides including glyphosate, organophosphates and neonicotinoids.⁴ The foods tested were items that kids and families typically eat including oat cereal, apples, applesauce, spinach and pinto beans. These pesticides are linked to serious adverse human health impacts and environmental harm.

We compared glyphosate residue levels we measured in cereal and pinto beans to Environmental Working Group’s (EWG) health-based benchmark.⁵ EWG determined that a one-in-a-million lifetime cancer risk for children would be posed by ingesting 0.01 milligrams of glyphosate per day.⁶ To reach this dose level, one would have to eat a single 60-gram serving of oat cereal with a glyphosate level of 160 ppb or a 90-gram serving of pinto beans with a glyphosate level of 110 ppb. The average residue level we found in Kroger Toasted Oats (483 ppb) was three times this benchmark and the average level in Kroger dry pinto beans (504 ppb) was 4.5 times EWG’s cancer risk benchmark for children.⁷

Kroger claims to be a leader in food safety. The Kroger website states that keeping food safe is “part of everything we do and a condition of working with Kroger for our suppliers and partners.”⁸ The company’s high standard of food safety must also account for the toxic pesticides present in common grocery items, especially Kroger’s store brand foods. The latest science demonstrates that small exposures to pesticides matter and that cumulative exposures from our daily diets add up.⁹

A peer-reviewed study published this month in *Environmental Research* and led by researchers at UC Berkeley and Friends of the Earth found that switching to an organic diet and dramatically reduced exposure to pesticides in just one week.¹⁰ The most significant declines involved organophosphates, a class of highly neurotoxic pesticides linked to brain damage in children: the study found a 95% drop in levels of malathion and a nearly two thirds reduction in chlorpyrifos. Organophosphates are so toxic to children’s developing brains that scientists have recommended a full ban.¹¹ The neonicotinoid pesticide clothianidin dropped by 83 percent, levels of pyrethroids were halved, and levels of 2,4-D dropped by 37 percent.¹²

These studies demonstrate that toxic pesticides are widely used, are showing up in Kroger brand food and that organic food rapidly and dramatically reduces exposure to these pesticides. It is critical that Kroger

address this issue in its supply chain because the company faces both reputational and supply chain risks for failing to address the overuse of agricultural pesticides.¹³

In addition to harming human health, the rampant use of toxic pesticides has been identified as a key driver of rapid, catastrophic global insect declines that pose risks not only to our food supply but life on Earth.¹⁴ A new comprehensive meta-analysis concluded more than 40 percent of the world's insect species could go extinct in the next three decades.¹⁵ The study found that insect biomass including bees, ants and beetles is falling by 2.5 percent a year, eight times faster than the rate of decline for mammals, birds, or reptiles.¹⁶ The authors write that “Unless we change our ways of producing food, insects as a whole will go down the path of extinction in a few decades.”¹⁷ 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.¹⁸ On the heels of this study, the Food and Agriculture Organization of the United Nations published a report warning that the state of the world's biodiversity threatens our food security, nutrition, health, livelihood and environment.¹⁹

The supply chain risks for food retailers are detailed in a report by the Cambridge Conservation Initiative that found that a dramatic decline in the number of pollinators, such as bees and butterflies, could lead to many companies facing shortages of raw materials, a fall in crop quality, and challenges around security of supply because of an emerging pollination deficit.²⁰

We recognize that Kroger acknowledges that pollinator protection is important. We were pleased to see Kroger adopt a policy to phase out the use of neonicotinoids on the garden plants that it sells. However, to fully address this crisis and protect Kroger's supply chain, the company must address the use of toxic pesticides in all product categories.

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 conventional supply chain and by increasing organic food offerings.**

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

- **Reduce Pesticides:** Establish a pollinator protection policy that includes phasing out neonicotinoids, glyphosate, organophosphates 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 sourcing from domestic 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, communities and consumers.

We will continue to educate the public about the state of the food retail industry in relation to pesticide reduction via 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.

You can find the food testing results at www.foe.org/food-testing-results and results of the organic diet study at www.organicforall.org.

Please contact Tiffany Finck-Haynes, Food and Agriculture Program at Friends of the Earth (beeaction@foe.org or 202-222-0715) by March 18, 2019 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,

Abundance NC
Agricultural Justice Project
All-Creatures.org
Alliance for Sustainability
American Bird Conservancy
Anacostia Watershed Society
Animal Protection League of New Jersey
Animals Are Sentient Beings, Inc.
Appetite For Change, Inc.
Association for the Tree of Life
Berks Gas Truth
Beyond Pesticides
Beyond Toxics
Biodynamic Association
Boulder Innovative Technologies, Inc
Breast Cancer Prevention Partners
Brooklyn Bridge CSA
Californians for Pesticide Reform
Cascades Raptor Center
CATA - The Farmworkers' Support Committee
Center for Environmental Health
Center for Food Safety
Central Florida Bread for the World
Central Maryland Beekeepers Association
Central Jersey Coalition Against Endless War
Citizens for GMO Labeling
Coalition for Sonoran Desert Protection
Cobblestone Valley Farm
Community Farm Alliance
Conscious Kitchen
Conservation Congress
Cottingham Farm
CREDO
Cuatro Puertas
Domestic Fair Trade Association
Eco-Justice Ministries
Ecology Center
Endangered Habitats League
Endangered Species Coalition
Experimental Farm Network
Fair Farms
Fair World Project

Family Farm Defenders
Farm Worker Ministry Northwest
Farmworker Association of Florida
Farmworker Justice
Florida Immigrant Coalition (FLIC)
Florida Institute for Conservation Science
Food Chain Workers Alliance
Food Empowerment Project
Friends of the Earth
Gap Mountain Goats
Georgia Organics
Global Exchange
Global Justice Ecology Project
GMO Free Connecticut
GMO Free Florida
GMO Free USA
GMO Science
Go Green Northbrook
Government Accountability Project Food Integrity Campaign
Green America
GROW North Texas
Humming for Bees
Illinois Right to Know GMO
Institute for Agriculture and Trade Policy
J.M. Andrews Family Farm LLLP
Kiss the Ground
Laurie M. Tisch Center for Food, Education & Policy, Teachers College, Columbia University
League of Humane Voters of New Jersey
Made Safe
Mangrove Action Project
Maryland Conservation Council
Maryland Ornithological Society
Maryland Pesticide Education Network
Mercola
MOMAS Moms Advocating Sustainability
Moms Across America
Moms Clean Air Force
Montana Organic Association
National Latino Farmers & Ranchers Trade Association
No Spray Zone
Noah's Notes
Non Toxic Communities
Northeast Organic Dairy Producers Alliance
Northeast Organic Farming Association of New York
Northeast Organic Farming Association of Vermont
Northwest Center for Alternatives to Pesticides
Occidental Arts and Ecology Center
Ohio Ecological Food and Farm Association
Organic Consumer Association
Organic Farmers' Agency for Relationship Marketing, Inc. (OFARM)
Organic Seed Growers and Trade Association
People and Pollinators Action Network
Pesticide Action Network
Pesticide Free Zone

Physicians for Social Responsibility, San Francisco Bay Area Chapter
Planting Justice
Pollinate Minnesota
Pollinator Friendly Alliance
Pollinator Project Rogue Valley
Pollinator Stewardship Council, Inc.
Rachel Carson Council
Rainforest Relief
Raptors Are The Solution
Real Food Utah
Roots of Change
RootsAction.org
Santa Cruz Permaculture
Save Our Sky Blue Waters
Sierra Club
Sierra Harvest
SumOfUs
Texas Organic Farmers and Gardeners Association
The Borneo Project
The Environmental Justice Coalition for Water
The Good Food Brigade
Toxic Free NC
Toxics Action Center
Turning Green
U.S. PIRG
Western Mass Pollinator Networks
WhyHunger
Wild Farm Alliance
100grannies for a Livable Future

¹ Sánchez-Bayo, F., & Wyckhuys, K. A. (2019). Worldwide decline of the entomofauna: A review of its drivers. *Biological Conservation*, 232, 8-27.

² Friends of the Earth. (2016). Letter to food retailers. Retrieved from https://1bps6437gg8c169i0y1drtgz-wpengine.netdna-ssl.com/wp-content/uploads/2017/webiva_fs_2/General_letters_to_Food_Retailers_Sept2016.pdf

³ Friends of the Earth. (2018). Letter to Kroger. Retrieved from https://1bps6437gg8c169i0y1drtgz-wpengine.netdna-ssl.com/wp-content/uploads/2018/06/FOE-letter-to-Kroger-June-2018_final-2.pdf

⁴ Klein, K. (2019). Toxic Secret: Pesticides Uncovered in Store Brand Cereal, Beans and Produce. *Friends of the Earth*. Retrieved from <https://foe.org/food-testing-results/>

⁵ Coleman, R. (2018). How Does EWG Set a ‘Health Benchmark’ for Glyphosate Exposure?. *Environmental Working Group*. Retrieved from <https://www.ewg.org/news-and-analysis/2018/08/how-does-ewg-set-health-benchmark-glyphosate-exposure>

⁶ Ibid 5.

⁷ Ibid 4.

⁸ Kroger. (2018). Kroger 2018 Sustainability Report. Retrieved from <http://sustainability.kroger.com/products-food-safety.html>

⁹ Friends of the Earth. Top Ten Truths About Pesticides. Retrieved from <https://1bps6437gg8c169i0y1drtgz-wpengine.netdna-ssl.com/wp-content/uploads/2019/01/O4A-Site-Top-Ten-Truths-Final-3.pdf>

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- ¹¹ Hertz-Picciotto, I., Sass, J.B., Engel, S., Bennett, D.H., Bradman, A., Eskenazi, B., Lanphear, B. and Whyatt, R., (2018). Organophosphate exposures during pregnancy and child neurodevelopment: Recommendations for essential policy reforms. *PLoS medicine*. 15(10), p.e1002671.
- ¹² Ibid 8.
- ¹³ Ceres. (2017). Agricultural Supply Chains as a Driver of Financial Risks. *Ceres*. Retrieved from https://www.ceres.org/sites/default/files/Engage%20the%20Chain/Ceres_EngageTheChain_Risks_110417.pdf
- ¹⁴ Ibid 1.
- ¹⁵ Ibid 1.
- ¹⁶ Ibid 1.
- ¹⁷ Ibid 1.
- ¹⁸ Feldkamp, L. (2014). Canary in the Cornfield: Why the Fuss About Monarchs?. *The Nature Conservancy*. Retrieved from <https://blog.nature.org/science/2014/02/26/cornfield-monarch-butterfly-decline-pollinators-agriculture/>
- ¹⁹ Belanger, J and Pilling, D. (2019). The State of the World's Biodiversity for Food and Agriculture. *Food and Agriculture Organization of the United Nation*. Retrieved from <http://www.fao.org/3/CA3129EN/CA3129EN.pdf>
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