



Friends of the Earth  
Les Ami(e)s de la Terre



To: Jason Buechel, CEO, Whole Foods Market;  
Cc: Karen Christensen, Senior Vice President, Perishables & Quality Standards;  
Ann Marie Hourigan, Quality Standards Sourcing Program.  
consumer.questions@wholefoods.com

RE: Concerns over genetically modified (GM) sweet corn sales at Whole Foods and request for a corporate policy to exclude GM produce

September 3, 2024

Dear Mr. Buechel,

We are writing to express our concern about Whole Foods' sale of "bioengineered" (genetically engineered/genetically modified) fresh sweet corn at your stores across Canada and to share information about the environmental impacts and human health risks of genetically modified (GM) corn. We are writing to ask Whole Foods Market to stop selling GM sweet corn and to consider implementing a policy to sell exclusively non-GM produce, i.e. only stock non-GM fruits and vegetables.

Whole Foods customers in Canada contacted us to share their concerns about the sale of GM whole sweet corn in your stores. Please see, for example, the attached photograph of corn on the cob from your store in Victoria, BC, taken on August 18, 2024. Customers have also identified "bioengineered" corn in your West Vancouver location in BC and in your Oakville, Mississauga, Yorkville, Yonge & Sheppard, and Ottawa locations in Ontario.

The choice to sell GM sweet corn is strikingly out of step with the Whole Foods Market brand and contradicts your public commitments to environmental stewardship and sustainable farming. Whole Foods' sale of GM sweet corn is baffling given the accessibility of non-GM sweet corn and the relative ease of establishing a fully non-GM produce section. The sale of GM sweet corn is an unnecessary reputational risk with a simple solution.

In the following, we provide information on the health and environmental risks of GM sweet corn; assessment of how the sale of GM sweet corn contradicts various commitments and statements made by Whole Foods Market; information about the ease of providing non-GM produce; and the status of Whole Foods' competitors on this issue.

## **GM sweet corn has negative environmental impacts and poses human health risks**

GM sweet corn plants are genetically modified to express a toxin from the soil bacteria *Bacillus thuringiensis* (*Bt*), to kill certain insect pests, transforming the GM plant itself into an insecticide. Most GM corn varieties on the market in Canada and the U.S. have more than one GM *Bt* trait as well as at least one GM herbicide-tolerant trait ([please see our factsheet for details](#)). Both types of GM traits are associated with health and environmental risks.

There is compelling, and ever-mounting, evidence in the scientific literature that GM *Bt* corn poses health risks. We bring your attention to our attached May 2024 factsheet [Genetically engineered Bt insect-resistant corn poses human health risks](#) which discusses the current research on the human health risks. Furthermore, the use of the herbicide glyphosate with GM glyphosate-tolerant corn has well-documented health impacts, please see our attached May 2024 factsheet [Genetically engineered crops have increased herbicide use](#).

The use of GM herbicide-tolerant crops, including GM corn, has intensified the pesticide treadmill in North American agriculture. [Herbicide sales in Canada have increased by 244% since the introduction of GM crops](#). Intensified use of glyphosate on GM corn and other GM crops (canola, soy and sugar beet) has led to the emergence and spread of many glyphosate-resistant weeds, leading to the use of additional hazardous herbicides, [including dicamba and 2,4-D](#).

Both *Bt* and herbicide-tolerant GM traits in corn are a threat to biodiversity. The use of glyphosate in the production of GM corn in the U.S. is directly implicated in the [demise of Monarch butterfly populations](#), and studies continue to indicate risks of GM *Bt* toxins to [non-target insects](#).

The safety of GM corn is currently subject to a high-profile trade dispute whereby the U.S. government is challenging Mexico's restrictions on the use of GM corn that were established due to health and environmental concerns as well as concerns over the rights of Indigenous peoples in Mexico (see [www.cban.ca/trade](http://www.cban.ca/trade)).

Additionally, there is unprecedented concentration in the global markets for GM seeds and pesticides which adds to public concern about the impacts of genetic modification. The companies that sell GM sweet corn seed are the [two biggest biotechnology and pesticide companies](#) in the world: Bayer (formerly Monsanto) and Syngenta.

## **Selling GM produce contradicts Whole Foods public statements and branding investments**

A policy to provide only non-GM produce would be in line with Whole Foods' stated Core Values as well as numerous commitments and standards around pollinator health, regenerative agriculture, biodiversity, and climate including those detailed in your 2023 Impact Report. In fact, the sale of GM sweet corn directly contradicts many of these statements and conflicts with the possible resultant expectations of many customers.

Sales of GM sweet corn are in direct conflict with [the statement](#) that “At Whole Foods Market, we are deeply committed to organic products and the expansion of the organic food industry”; the [Core Values](#) that begin with “We sell the highest Quality Natural and Organic Foods”; and with Whole Foods’ “long-standing commitment to organic” as described in the [2023 Impact Report](#). The Impact Report is clear that, “We continue to support organic as an important part of our purpose to nourish people and the planet” and describes organic as “part of a greater commitment to climate-smart agriculture” (page 18). Since organic farming prohibits the use of genetic modification, the production of GM crops is a direct threat to organic farming via [the risk of GM contamination](#). Keeping GM fruits and vegetables out of stores should therefore be a key part of Whole Foods’ commitment to supporting organic agriculture and key to your core value of selling the highest quality natural and organic foods.

Given the environmental impacts outlined above, the sale of GM sweet corn also undermines Whole Foods’ statements of support for biodiversity and your new pollinator health policy which includes the objective to reduce the need for chemical pesticides. As described in your [December 18, 2023 news release](#) relating to fresh produce and floral purchasing, “...Whole Foods Market recognizes native pollinators, such as bumble bees, wasps, and butterflies, are critical to the food system and an important indicator of biodiversity.”

As described in the 2023 Impact Report, by the end of last year Whole Foods had banned more than 550 “unacceptable” ingredients in food and beverages, supplements, body care and household cleaning product categories. We ask you to consider genetically modified fruits and vegetables as equally unacceptable.

### **Excluding GM sweet corn from stores is logistically simple**

We are not aware of any supply chain constraints to excluding GM sweet corn in Whole Foods stores. While GM corn used for processed food ingredients is dominant in the market, GM seed has a marginal share of the sweet corn seed market. Our testing of sweet corn samples from grocery stores in Canada from 2013 – 2016 and in 2020, revealed very little GM sweet corn, with some years showing none at all. Sourcing non-GM sweet corn should be logistically simple. CBAN provides [a simple guide for growers](#) and [a guide for consumers](#) on how to avoid GM sweet corn.

### **Whole Foods is lagging behind competitors**

In selling GM sweet corn, Whole Foods is out of step with some of the other major grocery retailers in Canada as well as many health food grocery chains in Whole Food store locations. The Ontario/Quebec/ retail chain METRO has a [Corporate Responsibility Plan](#) that requires suppliers to confirm their commitment not to sell GM sweet corn: for sweet corn, potatoes and apples in the produce section, METRO asks suppliers to provide a letter to confirm that products are not genetically modified. Canada’s largest retailer, Loblaws, has also informed CBAN that they have not knowingly sourced GM sweet corn in the past and have no plans to source it in the future. Please refer to our 2020 report [GMOs in Your Grocery Store: Ranking Company](#)

Transparency for details. While some major retailers in Canada are actively avoiding GM sweet corn, and at least one is publicly committing to do so, Whole Foods Market has GM sweet corn in at least seven of its stores in Canada.

After two decades without any new GM whole foods entering the marketplace, some new GM fruits and vegetables may soon be commercialized, and many consumers will be seeking a clear non-GM choice for produce and other whole food items. We encourage Whole Foods Market to consider its place in meeting this market demand.

### **Brand alignment for the future**

Selling GM sweet corn is wildly off-brand. Your heavy investment in infrastructure to ensure integrity in the Whole Foods supply chain and to meet the associated consumer expectations is unnecessarily compromised by the sale of GM sweet corn. Instead, implementing a policy of non-GM produce is consistent with the Whole Foods brand and is logistically simple.

We expect Whole Foods Market to continue to seek alignment with its customers' values and expectations. Whole Foods' website states that "we continually raise our standards" and, as you stated in the 2023 Impact Report, "Whole Foods Market was founded on the idea that how we grow, raise, farm and produce goods can have a profound and lasting impact on people and the planet. That was an innovative idea at the time, but we forged ahead, making every decision with that in mind. And we continue to do so to this day."

We are happy to provide more information and discuss these issues at any time.

We look forward to hearing from you.

Sincerely,



Lucy Sharratt  
Coordinator  
Canadian Biotechnology Action Network



Beatrice Olivastri  
CEO  
Friends of the Earth Canada



Rachel Parent  
Founder  
Kids Right to Know

*The Canadian Biotechnology Action Network (CBAN) brings together 15 organizations across Canada, including farmer associations, environmental groups and regional coalitions of community groups, to monitor and research the use of genetic engineering in food and farming, and its impacts. CBAN is a project of the MakeWay Charitable Society [www.cban.ca/corn](http://www.cban.ca/corn)*

*Friends of the Earth Canada is the Canadian member of Friends of the Earth International, the world's largest grassroots environmental network campaigning on today's most urgent environmental and social issues. [www.foecanada.org](http://www.foecanada.org)*

*Kids Right to Know is a not-for profit organization that seeks to educate youth and adults alike about the impacts of food systems on our health, environment, climate, animal welfare, and human rights. [www.kidsrighttoknow.com](http://www.kidsrighttoknow.com)*