

Jason Buechel Chief Executive Officer Whole Foods Market

Cc: Ann Marie Hourigan
Executive Leader of Quality Standards

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

August 12th, 2025

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 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.

This year and last year, Whole Foods customers in Canada contacted us to share their concerns about the sale of GM whole sweet corn. Please see, for example, the attached photograph of corn on the cob from your store in Victoria, BC, taken on August 3rd, 2025. In 2024, customers also identified "bioengineered" corn in your West Vancouver and Victoria locations in BC and in your Oakville, Mississauga, Yorkville, Yonge & Sheppard, and Ottawa locations in Ontario.

Your 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 also 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. Please consider the following information on the health and environmental risks of GM sweet corn; our 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 multiple GM *Bt* traits/toxins 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 <u>Genetically engineered *Bt* insect-resistant corn poses human health risks</u> which summarizes the current research on the human health risks. Furthermore, the use of the herbicide glyphosate with GM glyphosate-tolerant corn has mounting evidence of health impacts, please see our attached May 2024 factsheet <u>Genetically engineered crops have increased herbicide use</u>.

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 270% 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 nontarget insects.

Furthermore, 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 <u>two biggest biotechnology and pesticide</u> <u>companies</u> 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 2024 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' "duty to stand behind farmers who implement organic, regenerative and other climate-smart growing methods" as described in the 2024 Impact Report. 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 pollinator health policy which includes the objective to reduce the need for chemical pesticides. Your 2024 Impact Report includes the statement from the Vice President of Produce, Kevin Doty, "The health of our food system depends fundamentally on pollinators, and our Pollinator Health Policy strengthens our ongoing commitment to protecting these essential creatures and maintaining biodiversity. It's another meaningful advancement in our broader work of supporting climate-smart agriculture." (page 37)

In addition, as described in your 2024 Impact Report, by the end of last year Whole Foods had banned more than 562 "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 an annual 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 that operate in the same cities as Whole Foods Market 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 sold 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 for Whole Foods. 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 2024 Impact Report, "As the first and only certified organic national grocer in the United States, we continue to collaborate with suppliers to promote more sustainable agriculture such as organic and regenerative farming practices to enhance soil health and protect biodiversity...While we celebrate this year's progress and the decades of effort and investment behind it, we remain focused on the work ahead. Our commitment to raising standards across the grocery industry has never been stronger, as we work to drive meaningful change and secure the future of food."

We urge you to address this important issue quickly. 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

The Canadian Biotechnology Action Network (CBAN) brings together 15 groups to research, monitor and raise awareness about issues relating to genetic engineering in food and farming. CBAN members include farmer associations, environmental and social justice organizations.