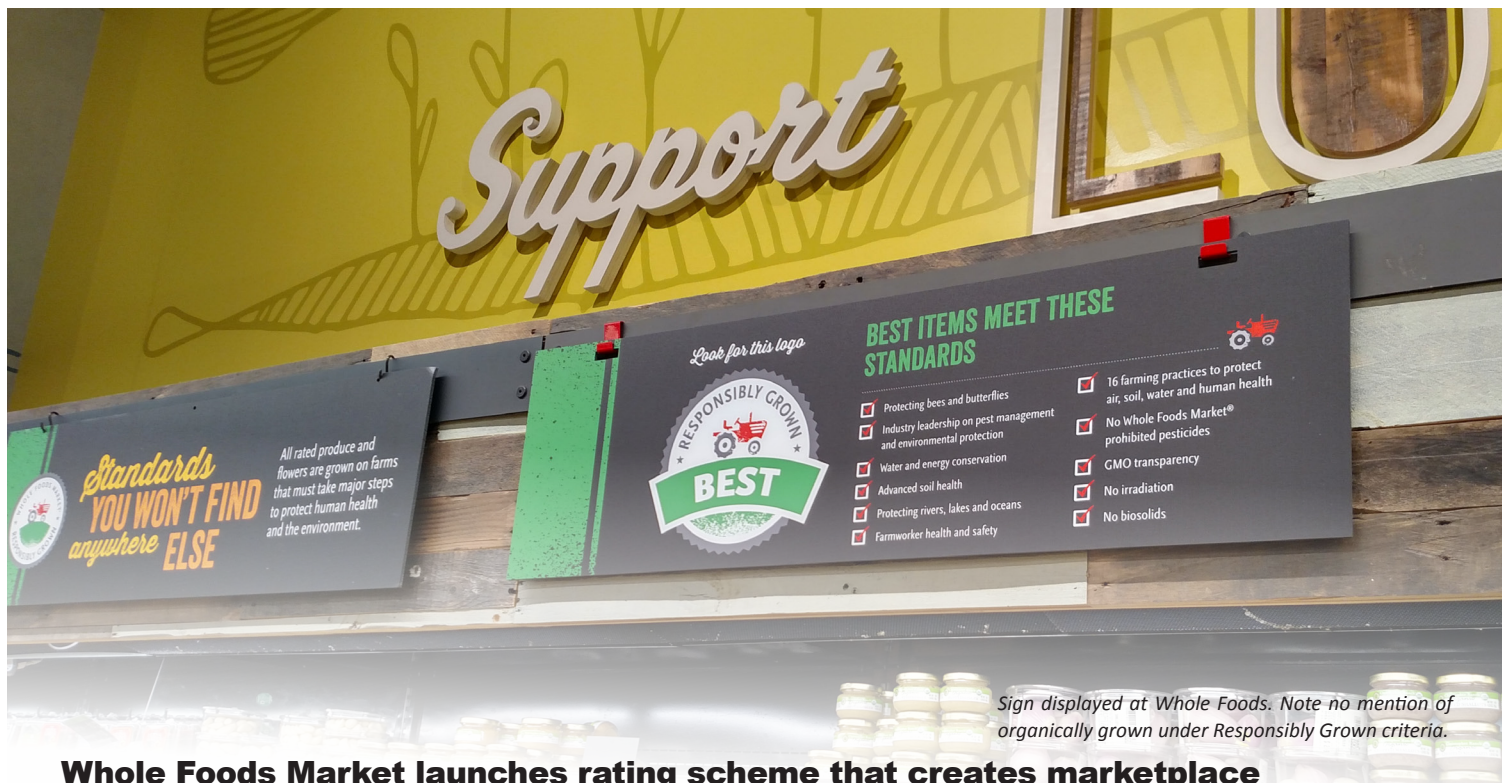


# When Sustainable Is Less than Organic, Is it Responsibly Grown?



## Whole Foods Market launches rating scheme that creates marketplace confusion and undercuts the organic label with weaker standards on pesticide use

By Nikita Naik and Jay Feldman

Whole Foods Market's *Responsibly Grown* rating system has been criticized as undermining the organic market by creating a set of standards based on criteria that do not utilize organic practices, values, and principles as its baseline. This allows products and commodities rated as "responsibly grown" to utilize a range of toxic inputs, including synthetic pesticides and fertilizers that are not permitted under organic standards as codified in the *Organic Foods Production Act* (OFPA). If the scheme was adding elements that have not yet been embraced by organic certification—such as farmworker protection, humane treatment and pasturing of animals, elevated restrictions of some controversial synthetic substances allowed in organic—then *Responsibly Grown* could have been envisioned as improving elements of sustainability within the organic framework.

In fact, *Responsibly Grown* creates a rating scheme distinct from organic standards and the organic review process that has brought together stakeholder groups (consumers, farmers, environmentalists, certifiers, retailers, processors, and scientists) under the National Organic Standards Board (NOSB), informed by independent Technical Review evaluations of petitioned materi-

als. As Whole Foods explains, its determinations of acceptable chemical use are based on "an assessment of our external team of experts." *Responsibly Grown* rejects the definition of allowed and prohibited substances under OFPA at its foundation. Therefore, with *Responsibly Grown* labeling, consumers and farmers are losing in the Whole Foods' rating some key foundational principles that gave birth to and continue to grow the organic market. The default assumption that synthetics cannot be used in organic unless a transparent public process, with input from all stakeholders, subjects allowed and prohibited substances to a rigorous assessment that (i) protects health and the environment, (ii) is compatible with defined organic standards, and (iii) has been determined to be essential as part of an organic systems plan that is subject to a third-party certification process.

The *Responsibly Grown* system may look attractive at first glance, especially if shoppers do not school themselves in understanding the rating system. When the rating system was unveiled in October of 2014, organic farmers criticized the grocery store chain, maintaining that it undermines organic agriculture and lacks the stringent standards and certification process required by organic law. Additional critiques add that the system places an added burden on small- to medium-sized family farms.

## How the Rating Scheme Works

Fresh fruits and vegetables are categorized according to tiers (“Good,” “Better,” and “Best”) based on a 300-point scoring index awarded according to survey responses from suppliers who must pay a fee to opt in. Suppliers earn points in categories such as farming practices, pesticide use policy, ecosystems and biodiversity, soil health, and farmworker health and safety.

According to a *New York Times* report on the rating system, Whole Foods’ associate global produce coordinator Matt Rogers “acknowledged that conventional farmers can get a ‘best’ rating while continuing to use various pesticides barred for use by organic farmers.” Mr. Rogers goes on to describe how a conventional potato grower for Whole Foods might apply the neurotoxic pesticide chlorpropham on potatoes to prevent sprouting, “which is not allowed in organic production but permissible in the *Responsibly Grown* program.” When the rating system was first introduced, suppliers who met the third-party certification standard, which includes USDA Organic along with other certifiers, were only allowed a maximum of 10 points out of the total 300 points. Originally, organic suppliers that did not participate in the *Responsibly Grown* program were given an “Unrated” label, even though their product may display the USDA organic label. Some of the products labeled “Best” may allow the use of harmful pesticides and practices, while the organic product receives a lower rating even though the toxic material is not used.

## Burden on Small Farmers

The concerns raised by organic farmers has prompted Whole Foods to make a small adjustment. In a public letter to John Mackey, co-founder and co-chief executive of Whole Foods, organic farmers wrote that the new rating system “is onerous, expensive, and shifts the cost of this marketing initiative to growers, many of whom are family-scale farmers with narrow profit margins.” In the letter, farmers specifically cite program fees, required technology, labor necessary to participate in the program, and costs ranging from \$5,000 to \$20,000 as adding extra burden on small- and medium-sized farms. The letter continues, “Whole Foods has done so much to help educate consumers about the advantages of eating an organic diet. This new rating program undermines, to a great degree, that effort.” Whole Foods, along with California Certified Organic Farmers (CCOF), issued a joint statement responding to farmers’ concerns with some steps that include allowing current organic vendors to suspend enrollment efforts until the end of 2015 in order to relieve pressure for small- and medium-sized producers. Additionally, certified organic producers are automatically granted a baseline “Good” rating with 20 instead of 10 additional points awarded. Ultimately, however, organic is not a baseline requirement for *Responsibly Grown*, allowing operations using hazardous pesticides to rate higher than organic producers.

## Fundamental Organic Practices and Materials Lost

Whole Foods’ *Responsibly Grown* rating system fails to match the stringent standards of the USDA organic certification pro-

cess. USDA organic certification requires that a number of criteria are met, including:

- Farms and processors must be certified by a USDA accredited certifying agent to ensure that USDA organic products meet all organic standards. Certifying agents make annual visits to farms and processing plants, and are permitted to make unannounced visits to make sure a facility is in compliance with the standards.
- Any land transitioning to organic production must not have had prohibited substances applied to it for the previous three years.
- Farms are required to submit to the certifier a comprehensive plan that includes information such as the land history of all fields, a fertility and nutrient management plan, a pest, weed, and disease management plan, and the origin, feed and health care of livestock. A grower must report all prod-

Get to know our  
**RESPONSIBLY GROWN**  
RATING SYSTEM

These ratings are based on standards you won't find anywhere else. In order to earn a **Good** rating, a farm must take major steps to protect human health & the environment. A **Better** rating indicates advanced performance, and a **Best** rating indicates exceptional, industry-leading performance.

GOOD	BETTER	BEST
16 farming practices to protect air, soil, water and human health	16 farming practices to protect air, soil, water and human health	16 farming practices to protect air, soil, water and human health
No Whole Foods Market prohibited pesticides	No Whole Foods Market prohibited pesticides	No Whole Foods Market prohibited pesticides
GMO transparency	GMO transparency	GMO transparency
No irradiation	No irradiation	No irradiation
No biosolids	No biosolid	No biosolid
	Water & energy conservation Advanced soil health Protecting rivers, lakes and oceans Farmworker health and safety	Protecting bees and butterflies Industry leadership on pest management and environmental protection Water & energy conservation Advanced soil health Protecting rivers, lakes and oceans Farmworker health and safety

Note no mention of organically grown under Responsibly Grown criteria.

ucts used on the farm. If a grower fails to report a product used, even if it is an approved product, s/he will be non-compliant with the organic standards and will receive an appropriate reprimand and/or revocation of certification.

- Only naturally derived pesticides and a relatively small number of synthetic ingredients of low toxicity may be used. Inert ingredients are limited to specific lower toxicity categories with ongoing reviews. Allowed synthetic and prohibited natural materials are subject to a public review and public hearing and comment.

In contrast, *Responsibly Grown*:

- Relies on the word of the supplier and lacks a certification process that ensures that standards are being fully met.
- Allows for the use of toxic pesticides. While the *Responsibly Grown* Rating System prohibits and restricts a set number of pesticides, there are many exceptions that create allowances that by their nature undermine organic systems, soil health, biodiversity, and farmer and farmworker protection. The most recent list of allowed exceptions include among the most hazardous neurotoxic

## Responsibly Grown Pesticides Exempted for Use on Specific Commodities as of June 2, 2015

The rating system allows exemptions for any pesticide use in the U.S. based on a Whole Foods review. Currently, the following time-limited exemptions have been approved and were scheduled for phase out between September and October 2015, depending on the crop. As of this writing, Whole Foods has not published an updated list of exemptions on its website. Regarding imported foods, the rating system leaves allowed pesticide uses to Whole Foods' discretion.

"Good" Only	Use	Health Effects
Carbaryl	Apples, Asparagus, Strawberries, Blackberries, Blueberries, Raspberries, Pineapples	Possible Carcinogen, Endocrine Disruptor, Reproductive/Development Effects, Possible Cholinesterase Inhibitor, Possible Neurotoxicant
Phosmet	Blueberries	Possible Carcinogen, Reproductive/Development Effects, Cholinesterase Inhibitor, Neurotoxicant
Chlorpyrifos	Strawberries, Citrus, Peaches, Pineapples, Floral Products	Possible Endocrine Disruptor, Reproductive/Development Effects, Cholinesterase Inhibitor, Neurotoxicant
Diazinon	Strawberries, Blackberries, Blueberries, Raspberries, Pineapples, Floral Products	Possible Carcinogen, Possible Mutagen, Possible Endocrine Disruptor, Reproductive/Development Effects, Cholinesterase Inhibitor, Neurotoxicant

Eligible for All Ratings	Use	Health Effects
Acibenzolar-S-methyl	Bananas	Reproductive/Development Effects
Difenoconazole	Bananas	Possible Carcinogen, Possible Reproductive/Development Effects
Epoxiconazole	Bananas	Possible Carcinogen, Possible Reproductive/Development Effects
Fenpropimorph	Bananas	Possible Reproductive/Development Effects
Mancozeb	Bananas	Carcinogen, Reproductive/Development Effects
Pyraclostrobin	Bananas	Possible Reproductive/Development Effects
Pyrimethanil	Bananas	Possible Endocrine Disruptor
Thiophanate-methyl	Bananas	Possible Carcinogen, Mutagen, Reproductive/Development Effects
Tridemorph	Bananas	Reproductive/Development Effects
Glyphosate	Bananas, Peppers	Carcinogen
Diquat Dibromide	Bananas	Potential Liver, Kidney, Stomach and Intestine Toxicant
Terbufos	Bananas	Cholinesterase Inhibitor, Neurotoxicant
Boscalid	Peppers	Possible Carcinogen, Possible Reproductive/Development Effects
Chlorfenapyr	Peppers	Possible Carcinogen
Abamectin	Floral Products	Possible Reproductive/Developmental Effects, Possible Neurotoxicant
Linuron	Floral Products	Possible Carcinogen, Possible Endocrine Disruptor, Reproductive/Development Effects
Methiocarb	Floral Products	Cholinesterase Inhibitor, Neurotoxicant



Conventional bell peppers grown in Mexico receive a rating of “Best” at a Whole Foods Market (left), while organic onions grown in California receive only a “Better” rating.

and carcinogenic pesticides, including carbaryl, phosmet, chlorpyrifos, diazinon, glyphosate and more (see tables to the left and below), all of which are banned from use in organic.

### Conclusion

As the organic market continues to grow beyond the \$40 billion mark, the challenge is to build on its sound foundation as a part of a rich history of continuous improvement. The marketplace plays an important role in encouraging public understanding of the value of organic systems in prohibiting substances hazardous to human health, building soil health, protecting land, air, water, and biodiversity, while contributing to carbon sequestration and efforts to dramatically slow global climate change. The elimination of hazardous, petroleum-based toxic materials and practices is a key principle to achieving these goals. At the same time, the regulatory process under organic rules in place is intended to ensure rigorous review of allowed materials on a five-year cycle and incentivize ingenuity, green materials, and new techniques that are compatible with organic systems.

Alternative labeling systems in the marketplace today, including *Responsibly Grown*, do not meet the rigorous standards and criteria, public review and comment, stakeholder collaboration and oversight, certification, and public support that are integral to certified organic practices. There are forces critical of organic that are advancing weaker standards that do not embrace the paradigm shift central to the principles and core values incorporated into the *Organic Foods Production Act*.

Beyond Pesticides seeks to strengthen organic and keep it accountable to the legal standards that are in place (see *The Case Against Contaminated Compost* on p15). This requires working in collaboration with a diverse coalition of stakeholders, including consumers and farmers, to grow agricultural production systems that do not unnecessarily compromise the health of people and the environment. We encourage people to contact USDA and the companies whose products they purchase by going to *Save our Organic* at [www.bit.ly/SaveOurOrganic](http://www.bit.ly/SaveOurOrganic).

### Bees and Pollinators Need Better Protection

With the preponderance of science indicating that honey bees, native bees, and other pollinators suffer devastating losses resulting from the use of bee-toxic pesticides, known as neonicotinoids (neonics), practices that incorporate these systemic and persistent chemicals are not considered responsible or sustainable by conservationists. When applied to the seed or plant, the chemical becomes incorporated throughout the plant and expresses itself through pollen, nectar, and guttation droplets, causing indiscriminate poisoning of organisms throughout the ecosystem. Yet, the “Good” or “Better” *Responsibly Grown* categories allow the use of highly toxic neonics, including chlothianidin, imdacloprid, thiamethoxam, and dinotefuran. These toxic substances are not permitted in the production of food labeled organic.

Eligible for “Good” Use and “Better” Ratings	Use	Effects
Imidacloprid	Any product other than living garden and floral plants for outdoor use	Toxic to Bees, Fish/Aquatic Organisms, Birds
Clothianidin	Any product other than living garden and floral plants for outdoor use	Toxic to Bees, Fish/Aquatic Organisms
Thiamethoxam	Any product other than living garden and floral plants for outdoor use	Toxic to Bees
Dinotefuran	Any product other than living garden and floral plants for outdoor use	Toxic to Bees