



WHOLE FOODS MARKET GMO Labeling Policy

VERSION 4.1
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As of September 1, 2018, Whole Foods Market will require suppliers of food products to label products that contain genetically modified (GMO) risk ingredients and are not third-party verified as non-GMO or organic.

We have updated our GMO labeling policy to reflect a number of regulatory developments that have occurred since we first announced our GMO Transparency Initiative in 2013. These changes will ensure our policy is consistent with the U.S. National Bioengineered Food Disclosure Law, passed in 2016, and its implementing regulations. We have also created a separate Frequently Asked Questions (FAQ) document, which we will continually update as new questions emerge.

The following chart and statements lay out the basic requirements of the policy.

	Products with Risk Ingredients (see Risk Ingredients information below chart)	Products without Risk Ingredients
Non-GMO verified under Whole Foods Market-approved program (see Approved Verification Programs below chart)	<p>Must either use verification program seal or make "non-GMO" or "not-genetically engineered" text claim.</p> <p>May use the seal of the Whole Foods Market-approved program under which they are certified.</p> <p>May make "non-GMO" or "not genetically engineered" text claim.</p>	<p>No label claim required.</p> <p>May use verification program seal.</p> <p>May make "non-GMO" or "not genetically engineered" text claim.</p>
USDA (or equivalent) Organic (Includes Organic, 100% Organic and Made with Organic ____.)	<p>May use USDA (or EU, Canada or Japan) certified organic seal or make organic text claim.</p> <p>Must make "organic" or "non-GMO" or "not genetically engineered" text claim.</p> <p>May make a truthful claim that "Organic Standards prohibit the use of genetically engineered ingredients."</p> <p>If making an organic claim, then may also make "non-GMO" or "not genetically engineered" text claim</p>	<p>May use USDA (or EU, Canada or Japan) certified organic seal or make organic text claim.</p> <p>May make "non-GMO" or "not genetically engineered text claim.</p> <p>May make a truthful claim that "Organic Standards prohibit the use of genetically engineered ingredients."</p>
No 3rd-Party Certification of Product	<p>Must make declaration "May contain ingredients produced with genetic engineering," "Produced with Genetic Engineering," "Genetically Engineered," or other statement compliant with applicable GMO labeling regulations. See below for additional guidance on size and placement. QR codes or phone numbers are not considered adequate declarations of GMO ingredients.</p> <p>If a multi-ingredient product, then may list specific risk ingredients as part of declaration (e.g. "May contain genetically engineered corn.").</p> <p>If product is or appears to be branded or produced by Whole Foods Market, it cannot contain ingredients that require GMO declaration.</p>	<p>No label claim required.</p> <p>No verification required.</p> <p>May not make a "non-GMO" claim. All "non-GMO" claims must be verified, even if there are no risk ingredients in the product.</p> <p>If a single-ingredient product (or single ingredient plus water and/or salt), then may make a truthful claim such as "blueberries are not a genetically engineered food."</p>

Approved Non-GMO Verification Programs

Whole Foods Market currently allows products verified under the following programs to make non-GMO claims:

- The Non-GMO Project
- NSF True North
- USDA Organic (and equivalent organic programs)

In addition, we permit the use of the Nutrasource iGen program for GMO testing of dietary supplement products. Please see Dietary Supplements below for more information on this program.

Risk Ingredients

Food Products

A risk ingredient in a food product is any ingredient derived from any genetically engineered food. As of October 2017, genetically engineered foods approved for market are: corn, soy, sugar beets, canola/rape, cotton, alfalfa, zucchini, summer squash, papaya and limited varieties of potatoes, salmon and apples. Many food ingredients and additives (such as corn syrup, citric and ascorbic acid, maltodextrin, sucrose and many more) are derived from these foods. We consider our suppliers responsible for accurately identifying any risk ingredients in their products.

Risk ingredients present at less than 0.9% of the product by weight are exempt from the labeling requirement. Note that this percentage applies to minor ingredients in the aggregate - the total percentage of all exempt ingredients cannot exceed 0.9% by weight. See "Nutrients and Minor Ingredients" below.

If product is or appears to be branded or produced by Whole Foods Market, it cannot contain any ingredients that require a GMO declaration. Thus, if risk ingredients are present at 0.9% or more (as noted above), they must be certified organic or non-GMO verified. This includes but is not limited to Private Label, Meat, Seafood, Prepared Foods, Specialty, Bakery, Produce and Bulk.

Animal Ingredients

In order to be consistent with the National Bioengineered Food Disclosure Law we will not require suppliers to label ingredients derived from animals fed GMO feed for the purpose of our 2018 transparency deadline. In other words, a food product that contains an unverified meat or dairy ingredient, but does not contain any other risk ingredients, will not be required to bear a "May contain ingredients produced with genetic engineering" or similar claim.

While not required, we encourage our suppliers to source animal ingredients from animals not fed GMO feed and to pursue non-GMO fed verification. We are committed to offering a robust array of verified non-GMO and organic options for those customers who are looking to avoid ingredients derived from animals fed GMO feed. All products including animal ingredients that are labeled "non-GMO" or "organic" must be verified under a Whole Foods Market-approved verification program, all of which do not allow ingredients derived from animals fed GMO feed.

Please note: For animal-derived products regulated by the USDA's Food Safety Inspection Service (FSIS), claims regarding the presence or absence of GMOs or ingredients from animals fed GMO feed are subject to FSIS label approval, and may require additional clarifying language or modification. We will work closely with our suppliers to ensure that our policy is consistent with any additional FSIS requirements or guidance.

Microorganisms

Many yeasts, enzymes and other microorganisms used in the production of cheese and other products are produced using genetic engineering. Both the USDA Organic standards and The Non- GMO Project do not allow the use of genetically engineered microorganisms. However, the National Bioengineered Food Disclosure Law does not require "produced with genetic engineering" statements on products that contain genetically engineered microorganisms. To be consistent with that law, and to simplify the process for our suppliers, we **will not require** products in which microorganisms are the only risk ingredient to make a "may contain ingredients produced with genetic engineering" or similar label claim unless required by applicable regulation.

Nutrients and Minor Ingredients

The focus of our 2018 transparency commitment is on major GMO ingredients. At this time, we will not require a label declaration for minor risk ingredients - those present at less than 0.9% in the aggregate, by weight. If your product is or appears to be branded or produced by Whole Foods Market, you must provide an ingredient-percentage breakdown (Private Label products) or a signed affidavit attesting to the "less than 0.9%" aggregate amount.

Alcohol

Alcoholic beverages, including beer, wine and spirits are exempt from the labeling requirement. Alcoholic beverages will not be required to bear a "May contain ingredients produced with genetic engineering" or similar label claim. And, we will not require any food or beverage products containing an alcoholic beverage as an ingredient and containing no other risk ingredients to make a "may contain ingredients produced with genetic engineering" or similar label claim. If a producer wishes to make a non-GMO claim for their product, the product must be certified organic or verified by the Non-GMO Project or NSF True North; however, it is the responsibility of the producer to ensure labeling compliance per regulations from the U.S. Alcohol and Tobacco Tax and Trade Bureau and other alcohol-regulation entities.

Unverified Products that Contain Risk Ingredients

GMO Ingredient Declaration

If the manufacturer is subject to the Federal or other applicable genetically engineered labeling regulation or approval process (including USDA FSIS regulated products), the declaration should be consistent with that regulation or approval process. Otherwise, the declaration should read: "May contain ingredients produced with genetic engineering," "Partially produced with genetic engineering," or "Genetically engineered." While it may be placed anywhere on the product label, the statement must comply with all applicable regulations; and at a minimum, be clear and conspicuous, and consistent with the requirements of the United States' Nutrition Labeling and Education Act:

Nutrition Labeling and Education Act of 1990 (as revised): General/Formal & Print Size [21 CFR 101.9(d)]: *Print must be in both upper and lower case in an easy to read type style and with sufficient contrast to assure readability. All nutrients listed must be printed in at least 8 point type. Smaller type size is permitted on packages < 12 square inches of available space [101.9(j)(13)].*

Non-GMO Ingredient Declaration

Risk ingredients within an unverified product may be individually verified under a Whole Foods Market-approved verification program. Each individually verified risk ingredient must be identified as “non-GMO” in the ingredient listing. Please see the FAQ document more information about acceptable testing and verification programs. A non-GMO claim other than with the ingredients listing is not permitted unless the entire product is non-GMO verified.

QR (Quick Response) Codes and Phone Numbers


We do not consider a QR code or phone number to be an adequate declaration of GMO ingredients for the purposes of this policy. If a product is required to declare GMO ingredients according to the above chart, then that declaration must be made through a text claim on the label. A QR code or phone number may be used *in addition* to the text claim, but do not alone satisfy the requirements of this policy.



Dietary Supplements

This policy only applies to food products sold in our stores. For dietary supplements, we will not require that any product makes a “May contain ingredients produced with genetic engineering” or similar label claim based on the presence of GMO risk ingredients at this time.

We will only allow “non-GMO” claims to be made on products that are verified under a Whole Foods Market-approved non-GMO verification program. All non-verified “non-GMO” claims must be removed from labels before September 1, 2018.

Due to the unique complexity of the dietary supplement supply chain, we acknowledge that finished product testing can play an important role in the verification of these products. Accordingly, we permit the use of the Nutrasource iGen GMO Testing Program for dietary supplement products only. This is a three-tiered program that relies on finished product testing (Tier 1), ingredient testing (Tier 2) and source material testing (Tier 3) to verify the absence of GMO DNA and proteins. Use and placement of the iGen seal and accompanying language are restricted as follows:

Tier	Seal	Required Accompanying Language	Placement
1		This product does not contain common GE genes or proteins. Visit igenprogram.com	Back label. Seal or language not allowed on Principal Display Panel (PDP).

2		This product and its ingredients do not contain common GE genes or proteins. Visit igenprogram.com	Back label. Seal or language not allowed on Principal Display Panel (PDP).
3		This product was not made using GE source materials. Visit igenprogram.com	Seal allowed on Principal Display Panel (PDP). Required accompanying language on PDP or back panel.

We acknowledge that the dietary supplement supply chain is extremely complex. We are working closely with our suppliers and the industry to develop additional meaningful product verification programs suited to the complexities of the dietary supplement supply chain.

Non-Food and Pet Products

Non-food products, including pet food, personal care and household cleaning products are exempt from this policy. Customers seeking to avoid GMO ingredients are encouraged to seek out certified organic or non-GMO verified products. We will only allow “non-GMO” claims to be made on products that are verified under a Whole Foods Market-approved non-GMO verification program. All unverified “non-GMO” claims must be removed from labels before September 1, 2018.

Canadian Stores

This policy also applies to products sold in Canadian stores; however, Canadian products are subject to additional governmental regulation of the language used in the label claim. Products sold in Canada are currently subject to the Canadian Standard CAN/CGSB-32.315-2004, “Voluntary Labelling and Advertising of Foods That Are and Are Not Products of Genetic Engineering.” This regulation governs label declarations for both products that do contain GE ingredients and those that do not. It also limits claims to those made about specific ingredients rather than overall products. We expect suppliers of products sold in our Canadian stores to ensure that such products are compliant with this standard.

United Kingdom Stores

This policy does not apply to our stores in the United Kingdom, as the EU already requires mandatory labeling of GMO ingredients in food products.

