

June 23, 2015

John Mackey
Co-CEO
Whole Foods Market
550 Bowie Street
Austin, TX 78703

Dear Mr. Mackey,

As Certified Organic farmers we value our longstanding relationships with Whole Foods Market. Very few businesses have done more to help build our organic movement over the last several decades. We sincerely value your patronage.

However, and we don't articulate this discontent lightly, we are deeply concerned that Whole Foods' newly launched "Responsibly Grown" rating program is onerous, expensive, and shifts the cost of this marketing initiative to growers, many of whom are family-scale farmers with narrow profit margins. We have limited amounts of management and staff time that are sorely taxed to execute the voluminous application your company has developed.

Paying for this program, its required technology, and the labor necessary to participate will be impossible for many of the smallest family-scale farmers and an excessive burden on medium-sized organic operations. We have surveyed numerous growers who have already complied and they estimate their costs ranging from \$5,000 to \$20,000.

Furthermore, our greatest concern is the devaluation of the organic label in Whole Foods Market stores. The "Responsibly Grown" program allows conventional farmers utilizing lower-cost management techniques, still incorporating toxic inputs, to unfairly compete with Certified Organic produce in your stores on a level footing with — or even rated better than — organic farmers. Growing ecologically produced food isn't cheap. And to that we must add the considerable cost of organic certification. Whole Foods has done so much to help educate its customers about the advantages of eating an organic diet. This new rating program undermines, to a great degree, those efforts.

Please take a look at the photographs below of asparagus sold by Whole Foods in California this spring. Why would your customer buy a "Good" asparagus, from a local, Certified Organic farm, when they could spend a lot less to buy the "Best" asparagus from a conventional farm in Mexico?

Mr. Mackey, you have long recognized that, both in the avoidance of toxic agrichemical residues in our food and in protecting our soil, air and water, farmers and farm workers, organic practices pay dividends to individual shoppers and society. The organic label is truly the gold standard.

We thoroughly understand the economic risks we are taking in articulating our concerns. Many growers we have spoken with share these concerns but feel too intimidated to come forward. Whole Foods is a dominant player in the organic marketplace and sales to your company are an important part of our farms' and families' incomes. But we have spent our life's work building the organic movement and we fear that this new marketing approach puts much of that progress at risk.

We respectfully submit a number of substantive recommendations for modification to your "Responsibly Grown" program. This could allow us to participate, as partners, and would help differentiate Whole Foods stores and the produce you sell without harming the Certified Organic growers the company has always championed:

1. No produce should ever be rated "Better" or "Best" in the program unless it is Certified Organic.
2. Under no circumstances should any Certified Organic produce be identified as "Unrated" in your stores. Certified Organic products are already "rated" and third-party inspected by accredited agents of the USDA. Unlike WFM's rating program, the USDA's National Organic Program carries the authority of federal law and does not exclusively depend on self-reporting.
3. Currently, the 10 points in the 300-point WFM scoring system that are awarded to a grower who maintains Certified Organic status is severely and unfairly suppressed.
4. National Organic Program (NOP) standards, like the WFM farmer questionnaire, focus to a great degree on cultural practices that enhance soil health and prevent environmental damage. Not only should your scoring system exempt Certified Organic producers from further documenting issues covered by NOP law, Certified Organic farmers, whose compliance is third-party verified, should be awarded extra points in every one of these areas.
5. When customers purchase Certified Organic produce in your stores, they protect and promote the health of their own families, and our planet, while that patronage assures us farmers, our workers, and our families are never exposed to toxic agrichemicals. This is a fundamental factor that a retailer of your ethical stature must hold paramount and could be an argument for not including any conventional produce in your "Responsibly Grown" rating system.
6. The monetary cost and time commitment to comply with the WFM rating program is excessive and will make it difficult or impossible for small, entry-level and many long-standing moderate-scale growers. As a corporation with one of the highest value market capitalizations in the grocery industry, it seems ethically irresponsible to shift the costs from your business enterprise, which stands to reap the benefit from this arrangement, to small business owners who are disproportionately powerless as individuals to negotiate with WFM.

All of us value our working relationships with Whole Foods. It was a difficult decision for each of us to come forward and share our concerns with you. Many other growers we have spoken with share our sentiments but have felt unable to put their livelihoods at risk. Your patronage is important to our farm enterprises.

However, being members of the organic movement, which many of us have been engaged in for well beyond 30 years, is a responsibility and a privilege we share with Whole Foods Market. Our life's work pays dividends to society and tangibly improves the stewardship of our planet. Unfortunately, we feel that WFM's "Responsibly Grown" program, in its current iteration, jeopardizes much of what we all have worked so hard to build.

We pray you will take our concerns seriously and we offer to collaborate with you on improving the "Responsibly Grown" rating program, while safeguarding Whole Foods Market's historical commitment to selling the very best produce in its stores.

Very truly yours,

Tom & Denesse Willey
T&D Willey Farms
Madera, California

Jim Crawford
New Morning Farm
Hustontown, Pennsylvania

Jeff Larkey
Route 1 Farms
Santa Cruz, California

Jim Cochran
Swanton Berry Farm
Davenport, California

Vernon Peterson
Abundant Harvest Organics
Kingsburg, California

Kevin Ryan
Horsefeather Farm
Lamoni, Iowa

Laura and Sally Harper
Del Valle Pecans, LLC
Mesilla Park, New Mexico

Paul Underhill
Terra Firma Farm
Winters, California

Tim Mueller
Riverdog Farm
Guinda, California

Mark Stanley
Help From Above Farms
Three Springs, Pennsylvania

Dale and Christine Coke
Jardines
San Juan Bautista, California

Byron and Janice Smith
Sunizona Family Farms
Willcox, Arizona

Pete Johnson
Pete's Greens
Craftsbury, Vermont

Michael Collins
Old Athens Farm
Westminster, Vermont

Paul Harlow
Harlow Farm
Westminster, Vermont

David Marchant
River Berry Farm
Fairfax, Vermont

Annie Lévesque & Frédéric Jobin-Lawler
L'Abri végétal
Compton, Québec, Canada

This internationally known advocate for land ethics and sustainable agriculture supports his colleagues above:

Fred Kirschenmann
Kirschenmann Family Farms Inc.
Medina, North Dakota
Distinguished Fellow, Leopold Center for Sustainable Agriculture

The following Certified Organic farmers support their above-listed colleagues who are currently selling to Whole Foods. A number of the farmers below have previously sold to Whole Foods and some hope to in the future:

David Obermiller
Harvest Fields Organic Farm
Fresno, California

Antoinette Foerster and Elaine Hierholzer
Foerster Organic Farm
Chicago, Illinois

Jim & Megan Gerritsen
Wood Prairie Farm
Bridgewater, Maine

Antonio Manzanares
Shepard's Lamb
Tierra Amarilla, New Mexico

Grant Brians
Heirloom Organic Gardens
Hollister, California

Fred Griffen
High Lonesome Farm
Cincinnatus, New York

Richard Bass
Turtle Ledge Farm
Hampton, Connecticut

Alan Ward
Ward Farm
Viborg, South Dakota

Birgit and Erik Landowne
Kimberton CSA
Kimberton, Pennsylvania

Mark Wickenhauser
Wicmar Dairy
Cologne, Minnesota

Gail Schwenke
Schwenke Farm
Massena, Iowa

Catherine Wainer
Sausalito Springs
Petaluma, California

Cynthia A. Daley, Ph.D.
Organic Dairy Education & Research
Program
Professor/College of Agriculture
California State University
Chico, California

Rodney Graham
Oxbow Organic Farm
Hunt, New York

Andrew Dykstra
Dykstra Farms
Burlington, Washington

Carla Kostka
Castle Rock Organic Farms
Osseo, Wisconsin

Kirsten Olson & John Tannaci
Hunter Orchards
Grenada, California

Tom Hunter
Tangled Bank Farm
Wabasha, Minnesota

Dean McIlvaine
Twin Parks Organic Farm
West Salem, Ohio

Richard Parrott
Parrott's Organic Farm & Livestock
Twin Falls, Idaho

Lou Johns
Blue Heron Farm
Lodi, New York

Nancy Coonridge
Coonridge Organic Goat Cheese
Pie Town, New Mexico

Barrie and Vaughan Grant
Grant Grove
Bonsall, California

John R. Myer
Myer Farm
Ovid, New York

Jim Eldon
Fiddler's Green Farm
Brooks, California

Ron Ackerman
Ackerman Certified Organic Farm
Chenoa, Illinois

Jon Bansen
Double J Jerseys, Inc.
Monmouth, Oregon

David Van Eeckhout
Hog's Back Farm, LLC
Arkansaw, Wisconsin

Les and Debbie Guile
Walnut Grove Farm
Augusta, New Jersey

Bill Jessup
B&J Ranch
Thermal, California

Helmut Klauer
Classic Organics
Gaviota, California

Kathie Arnold
Twin Oaks Dairy LLC
Truxton, New York

Douglas Bowne
Wellspring Farm
Little Falls, New York

Tim P. Miller
Millberg Farms
Kyle, Texas

Sen. David Zuckerman, VT State Senate
Full Moon Farm
Hinesburg, Vermont

Kate Burroughs
Aloha 'Aina Tropicals
Laupohoe, Hawaii

Tom Szulist
Singer Farm Naturals, LLC
Appleton, New York

John Boere
J & D Dairy
Modesto, California

The following organizations have also signed on in support of organic farmers:

Ecological Farming Association (EFA)

Maine Organic Farmers and Gardeners
Association (MOFGA)

California Certified Organic Farmers
(CCOF)

Center for Food Safety

Food and Water Watch

Rural Advancement Foundation
International (RAFI-USA)

Northeast Organic Dairy Producers
Alliance (NODPA)

The Cornucopia Institute

Food Democracy Now

Community Alliance with Family Farmers (CAFF)

Western Organic Dairy Producers Alliance (WODPA)

The Organic Seed Growers and Trade Association

Organic Consumers Association



Photographs of asparagus sold by Whole Foods in California this spring. Conventionally grown asparagus from Mexico is rated "Best" while more expensive asparagus, from a local, Certified Organic farm in California, is rated only "Good". Which will most customers likely choose?

