



# Abbott Laboratories Shareholder Resolution

## Executive Summary

As You Sow has asked Abbott Laboratories to publish a report to shareholders about genetically modified organisms (GMOs) in the company's products. Abbott uses genetically modified ingredients in products in its nutritional lines, including its Similac Soy Isomil infant formula.

As You Sow took this action because GMOs are a controversial issue to consumers, and the company has not reported sufficient information to shareholders about the shareholder risk associated with the use of GMO ingredients in our products.

## Resolution

**RESOLVED:** Shareholders request the Board of Directors publish within six months, at reasonable cost and excluding proprietary information, a report on genetically engineered ingredients contained in nutritional products sold by Abbott. This report should list Abbott product categories that contain GMOs and estimated portion of products in each category that contain GMOs, and discuss any actions management is taking to reduce or eliminate GMOs from its products, until and unless long-term studies show that the genetically engineered crops and associated farming practices are not harmful to the environment, the agriculture industry, or human or animal health.

**SUPPORTING STATEMENT:** This public issue is growing, as GMOs in Vermont will be labeled beginning in 2016, more legislation is proposed, and more toxic pesticides will be used with a new generation of GMOs. Abbott has not provided shareholders with sufficient information on this issue.

## Background on GMOs

The genetically modified organisms (GMOs, also known as genetically engineered (GE) crops) grown in the U.S. do not enhance yields or nutrition; instead, the vast majority of GE crops in the US are designed to (1) survive toxic herbicides or (2) continually produce insecticide.<sup>1</sup> The former category (which includes 84% of GE crop acreage), consists mostly of "herbicide-resistant" crops genetically engineered to survive the herbicide glyphosate (Roundup-Ready). The latter category consists entirely of crops engineered to continually produce Bt, a bacterial insecticide. New generations of crops that are undergoing USDA review (or have recently been approved) include crops with "stacked traits" that are both herbicide-resistant and insecticide-producing, as well as new herbicide-resistant crops that have been engineered to survive dicamba, 2,4-D, and "fops" grass herbicides (e.g. quizalofop).



## Consumer Concern about GMOs

The environmental and social impacts of GMOs and associated farming practices make them highly controversial.

- 90-93% of Americans support GMO labeling, according to several polls by national news and research organizations over the last several years.<sup>2,3,4</sup>
- 39% of consumers avoid or reduce buying GMOs, a 56% increase since 2010 and a 254% increase since 2007, according to a 2013 Hartman Group survey.<sup>5</sup>
- Packaged Facts, a market research firm, predicts that the non-GMO food market will grow to \$800 billion by 2017.<sup>6</sup>
- *Supermarket News* successfully predicted an unprecedented upsurge in consumer awareness and concern about GMOs starting in 2010, suggesting that GMOs might become a new food “culprit” like trans fats and carbohydrates, which “defined the decade” for the food industry.<sup>7</sup>
- Companies that opposed GMO-labeling ballot initiatives in California and Washington state suffered significant consumer backlash and reputational damage.<sup>8,9</sup>

The food industry has begun to respond to widespread criticism of GMOs. After an intense consumer campaign, General Mills reformulated its original Cheerios cereal in January 2014. Other brands that have announced reformulation include Post’s Grape Nuts, Kellogg’s Kashi, Ben & Jerry’s (a subsidiary of Unilever), Boulder Brands’ Smart Balance, and Chipotle Mexican Grill.<sup>10</sup>

After shareholder pressure resulted in GMO labeling for all house brand products, Whole Foods Market announced that all foods in its stores would be subject to GMO labeling 2018.<sup>11</sup> Whole Foods provided an update<sup>12</sup> in September 2013 on the progress it has made with its many suppliers. The company sees this as an enormous brand differentiator and a clear win for investors and customers. The company also notes that Non-GMO Project Verified products experience a 15-30% sales increase.<sup>13</sup>

Local and state movements to regulate GMOs have been gaining momentum, increasing the financial risk for companies producing or using GMOs.

## Regulation of GMOs

While GMOs are labeled or banned in 64 countries including the European Union, India, Russia, China, and Japan, the U.S. federal government has no such regulations.<sup>14</sup> The Food and Drug Administration, Department of Agriculture, and Environmental Protection Agency do not conduct or require long-term safety studies on environmental or health impacts.

In May 2014, Vermont became the first state to pass a “no-strings-attached” GMO labeling law<sup>15</sup>, and two Oregon counties and two Hawaii counties have approved cultivation bans in the last two years.<sup>16,17</sup> These laws join GMO labeling laws in Connecticut and Maine that will trigger when other states (including New York) follow suit, and a GE salmon labeling law in Alaska.



In July 2014, the U.S. Fish and Wildlife Service (FWS) announced that GMOs will no longer be allowed in National Wildlife Refuges across the country, which account for over 150 million acres of federal land.<sup>18</sup>

In the European Union (EU), all GMOs are considered "new food" and subject to extensive, case-by-case, science-based food evaluation by the European Food Safety Authority (EFSA) and authorization by the European Commission (EC). There are four categories of criteria for authorization: "safety," "freedom of choice," "labelling," and "traceability." If they are approved by the Commission, individual EU member states can ban individual varieties. As of April 2011, there were 22 active bans in place across six member states: Austria, France, Germany, Luxembourg, Greece, and Hungary.<sup>19</sup>

### **Environmental and Social Effects of GMOs**

Independent peer-reviewed research documents the impacts of GMO usage on the environment and public health, and the growing risk to America's food security. Food security "exists when all people of a given spatial unit, at all times, have physical and economic access to sufficient, safe and nutritious food to meet their dietary needs and food preferences for an active and healthy life, and that is obtained in a socially acceptable and ecologically sustainable manner."<sup>20</sup> The use of genetically engineered crops have increased health risks from pesticides, created a crisis of pesticide-resistant weeds and insects, increased pollution, and endangered public health.

#### **Effects on Agriculture and the Environment**

- Several studies have demonstrated that the widespread use of herbicide-resistant GE crops has led to an epidemic of herbicide-resistant weeds, which require an ever-increasing amount of herbicides to combat them.<sup>21,22</sup>
- The United States House of Representatives Committee on Oversight and Government Reform held hearings in 2010, titled "Are Superweeds an Outgrowth of USDA Biotech Policy?", to investigate herbicide-resistance and crop contamination.<sup>23</sup>
  - Troy Roush, an Indiana farmer who is Vice President of the National Corn Grower Association, testified that "bigger farms with multiple herbicide resistance problems are in great danger... The increased ease of use and convenience of herbicide tolerant crops enabled many farmers to significantly increase crop acreage which helped to offset higher production costs and, in some cases, lower yields. Biotech companies encouraged farm expansion by offering discounts for buying seed in bulk... Farmers who expanded farm size are now finding it difficult, if not impossible, to manage the larger operations now that additional time is required for weed management."
- Research from the University of Canterbury shows that "the biotechnologies used in North American staple crop production are lowering yields and increasing pesticide use compared to Western Europe," which uses little GM seed.<sup>24</sup>
- Contamination is a major impact of GM crops. As of January 2011, there were more than 300 reported cases of contamination incidents worldwide in which genetically modified seeds or crops were found in fields of products for which they were not intended. Some of these cases have resulted in major worldwide trade disruptions and have cost farmers, food processors and supermarkets billions of dollars.<sup>25</sup>



- Bayer, one of the world's chemical and biotech companies, stated in a trial that even the best practices cannot entirely stop GMO contamination.<sup>26</sup>
- In 2013, the New York Times reported that the corn disease Goss' Wilt is "a tidal wave washing across the Corn Belt" and plant pathologists suspect the biggest factor is genetically modified corn.<sup>27</sup>
- Newsweek reported in March 2014 that "one of industrial agriculture's biggest GMO crops may have just backfired" because "corn-destroying rootworms have evolved to be resistant to the Bt corn engineered to kill them."<sup>28</sup>
- In response to the serious and growing problems generated by Monsanto's Roundup Ready crops, Dow Chemical has announced new GM crops resistant to 2,4-D, a toxic herbicide used in the Vietnam War-era defoliant Agent Orange. 2,4-D is prone to drift, and is already responsible for more episodes of crop injury than any other herbicide.<sup>29</sup>
  - Many researchers believe that the chemical arms race is impossible to win, making disengagement from herbicide-resistant crops the only sensible policy.<sup>30</sup>
- GM crops exacerbate the agricultural practice of monoculture, in which a single crop is grown over a wide area for many consecutive years. Monoculture is used widely in modern industrial agriculture; its implementation has allowed for large harvests from minimal labor, but has also led to the quicker spread of pests and diseases, because uniform crops are more susceptible to pathogens.<sup>31</sup> Advocates of polyculture (a principle of permaculture) and organic farming contend that greater crop diversity and pesticide reduction (or elimination) create more secure and healthy agricultural systems.<sup>32</sup>

### Effects on Public Health

- In July 2013, the EPA raised the maximum allowable residues of glyphosate in our food, despite receiving over 10,800 comments against the proposed change in regulation. Through the EPA's new standards, the allowable amount of glyphosate on oilseed crops has increased from 20 ppm to 40 ppm. The EPA also increased the allowable levels for several other crops, including sweet potatoes (from 0.2 ppm to 3 ppm) and carrots (0.2 ppm to 5 ppm).<sup>33</sup>
- Research from the University of Caen found that "Roundup's inert ingredients amplified the toxic effect on human cells — even at concentrations much more diluted than those used on farms and lawns."<sup>34</sup>
- In 2010, the U.K. Food Standards Agency reported that 5.6% of 107 bread samples contained glyphosate residues. Three samples had 0.5 parts per million (ppm) of glyphosate, a relatively high level compared to the other pesticides found in these bread samples.<sup>35</sup>
- According to a 2012 report on glyphosate residues in food in the UK, residues as high as 1.1 ppm were detected in whole wheat flour. Lesser residues were detected in a wide range of breads. Residues of 0.6 ppm were found in dried lentils and peas, 2.7 ppm in dried beans, and 11 ppm in dried chickpeas.<sup>36</sup>

### Effects on Farmers and Small Business

- The companies that sell genetically modified crops have driven consolidation in seed markets, reducing choice and increasing costs for the average American farmer. Economists characterize an uncompetitive market when the concentration ratio of the top four firms (CR4) is 40% or higher. In seed, the top four firms account for 50% of the proprietary market, and 43% of the commercial market. The lack of competition has led



to increased seed prices, increased herbicide prices, and fewer conventional seed options, harming small- and mid-size farmers and rural communities.<sup>37</sup>

### **Effects on Global Food Supply**

There is broad consensus that genetic engineering is not helpful or necessary to feed the world's population, in the near- or long-term future. The United Nations recognizes that undeveloped nations face a myriad of issues that stem from poverty (including hunger) which must be addressed by "sustainable development." This term rose to significance after the United Nations World Commission on Environment and Development's *Burntland Report* defined it as "development that meets the needs of the present without compromising the ability of future generations to meet their own needs."<sup>38</sup> Amartya Sen's Nobel Prize-winning research demonstrated that hunger is not typically caused by a lack of food, but rather poor food distribution and governmental policies in the developing world.<sup>39</sup>

Similarly, many research institutions and international organizations report that organic, non-chemical, and non-GMO farming practices are more beneficial to food security, public health, and the environment.

- The Rodale Institute's 30-year study found that organic farming used less energy, produced less greenhouse gas, and outperformed conventional and GMO farming during droughts.<sup>40</sup>
- A study from the United Nations Food and Agricultural Organization contends that "organic agriculture has the potential to secure a global food supply, just as conventional agriculture does today, but with reduced environmental impact."<sup>41</sup>
- The 2008 International Assessment of Agriculture Science and Technology for Development, initiated by the World Bank and the Food and Agricultural Organization of the United Nations, concluded that GMOs are unlikely to address persistent hunger and poverty. Instead, the report describes comprehensive policies to reorient local and global food systems towards greater social equity and ecological sustainability.<sup>42</sup>
- The U.N. Commission on Trade and Development's 2013 review concluded that transformative changes are needed in food, agricultural, and trade systems to increase biodiversity, reduce pesticides, support small-scale farmers, and strengthen local food systems.<sup>43</sup>
- A 2012 Center for Food Safety report demonstrated that increased agricultural yields and declining soil erosion from the 1970s on were spurred by strong financial incentives to adopt soil conserving farming practices, and that GM crops have slowed or eliminated these positive trends.<sup>44</sup>

### **Insufficient Disclosure by Abbott**

The words "genetically modified" and "GMO" do not appear on the company's website, nor do they appear in any of the company's Global Citizenship Reports, which have been published annually since 2004, nor do they appear in the company's 10-K (Annual Report). Due to the environmental and social impacts of GMOs, and intense national debate, shareholders believe that genetically modified ingredients are a material risk. Therefore, the company should report on GMOs in their 10-K and in other reports. Disclosure will allow shareholders to ascertain whether the company is appropriately managing the issue, immediately increasing shareholder value.



## Response to the Abbott Board of Directors' Statement in Opposition

The Board of Directors of Abbott Laboratories recommends that shareholders vote against the proposal, but the Board's reasoning is misleading; the following statements made by the Board do not provide a compelling argument against the shareholder proposal.

1. "This proposal for a report is similar to the requests for labeling or removal of genetically engineered ("GMO") ingredients that the proponent previously made in 2012 and 2013 that were overwhelming rejected by shareholders."<sup>45</sup>

The request of this Proposal is completely different from proposals filed in 2012 and 2013. Shareholder resolutions filed by proponents in 2012 and 2013 requested that Abbott take specific action with regard to its products, either labeling them or removing ingredients from them. This proposal does not make a similar request. This proposal requests that the company report to shareholders about its use of controversial crops and other relevant information.

2. "Abbott issues a Global Citizenship Report annually, which includes all aspects of our environmental and sustainability performance across all our businesses. Creating a separate report focusing on a single issue... is unnecessary..."<sup>46</sup>

The Board claims that the company's Global Citizenship Report "includes all aspects of our environmental and sustainability performance across all our businesses", however, the company's report does not discuss genetically engineered crops at all, nor the environmental effects of these crops and their associated farming practices.

3. "Proponent references an overwhelming majority of consumers supporting the labeling of GMO ingredients. Yet the citizens of California, Colorado, Washington, and Oregon opposed ballot initiatives to require the labeling of GMO ingredients."<sup>47</sup>

Dozens of polls conducted over several years by reputable news and research organizations, such as the New York Times, Reuters, MSNBC, the Washington Post, and ABC News, consistently find that 90-95% of Americans support GMO labeling.<sup>48,49,50</sup> The Board of Directors does not note that all of the ballot initiatives lost by less than 3 percentage points, that the biotechnology industry broke state records for political spending to influence vote results,<sup>51</sup> or that voter turnouts for these ballot initiatives were as low as 44.5%.<sup>52</sup> The Board's implication that consumers are not concerned with environmental issues, genetic engineering, or sustainable agricultural practices is unfounded.

4. "Many well-respected organizations and regulatory agencies around the world... have found the science supporting the safety of GMO ingredients to be reliable."<sup>53</sup>

The Board misrepresents the Proposal, which does not allege that GMO ingredients to be unsafe for human consumption. In addition, the Board offers no rebuttal to the increasing number of studies and reports that document environmental crises that genetically engineered crops, and their associated farming practices, are exacerbating.



5. “Biotechnology has enabled farmers worldwide to maintain and increase crop yields, improve farming sustainability, use less water and pesticides, preserve the soil, utilize a smaller carbon footprint and meet the ever expanding demand for food.”<sup>54</sup>

The Board does not provide any sources for this claim. The reality of genetic engineering, as stated earlier, is that GE crops grown in the U.S. do not enhance yields or nutrition; instead, the vast majority of GE crops in the US are designed to (1) survive toxic herbicides or (2) continually produce insecticide.<sup>55</sup> The widespread use of herbicide-resistant GE crops has led to an epidemic of herbicide-resistant weeds, which require an ever-increasing amount of herbicides to combat them; the consequences of this herbicide overuse have been profound.<sup>56,57</sup>

6. “We will also continue to evaluate our policy regarding labeling of GMO ingredients in light of any changes to the scientific and regulatory environments as well as consumer preferences.”<sup>58</sup>

There have been massive changes to both the scientific environment and consumer preferences in recent years, as scientific research has documented the agricultural effects of GE crops and the pesticide overuse that these crops have contributed to. However, the Board has not communicated to shareholders regarding these changes, and has not provided any information regarding the company’s use of these crops or exposure to the risks that these environmental issues pose.

## Conclusion

The resolution should be supported with a recommendation of a YES vote. GMOs are a controversial social and environmental issue, and thus a material risk, and Abbott has not reported sufficient information to shareholders about the company’s exposure to nor management of the issue.

---

<sup>1</sup> Center for Food Safety, 2012, *Going Backwards: Dow’s 2,4-D-Resistant Crops and a More Toxic Future* (Food Safety Review, Winter 2012), <http://www.centerforfoodsafety.org/reports/1787/food-safety-review-going-backwards-dows-24-d-resistant-crops-and-a-more-toxic-future>

<sup>2</sup> New York Times, July 27 2013, “Strong Support for Modified Foods,” [http://www.nytimes.com/2013/07/28/science/strong-support-for-labeling-modified-foods.html?\\_r=3&&gwh=D5B7AC4AB592DE4BB119357F93E99FB8&gwt=pay](http://www.nytimes.com/2013/07/28/science/strong-support-for-labeling-modified-foods.html?_r=3&&gwh=D5B7AC4AB592DE4BB119357F93E99FB8&gwt=pay)

<sup>3</sup> Consumers Union, 2014, “New Consumer Reports Poll Shows Consumer Demand for Strong Federal Standards for Genetically Engineered Food,” <http://www.commondreams.org/newswire/2014/06/09-2>

<sup>4</sup> Center for Food Safety, 2012, “GMO (GE) Labeling Polls,” <http://www.cga.ct.gov/2012/ENVdata/Tmy/2012HB-05117-R000222-Fairfield%20Green%20Food%20Guide,%20LLC---Analiese%20Paik5-TMY.PDF>

<sup>5</sup> The Hartman Group, 2013, *Sustainability 2013*, <http://hartbeat.hartman-group.com/article/452/Sustainability-2013>

<sup>6</sup> Packaged Facts, 2013, *Non-GMO Foods: Global Market Perspective*, <http://www.packagedfacts.com/Non-GMO-Foods-7822141/>

<sup>7</sup> Supermarket News, Dec. 7 2009, “Stakeholders in GMO Debate Prepare to Clash Again,”

<http://supermarketnews.com/blog/stakeholders-gmo-debate-prepare-clash-again>

<sup>8</sup> Green America, Dec. 6 2012, “GMO Inside Campaign: Cheerios Facebook Page Flooded By Anti-GMO Comments” [Press Release], <http://www.prnewswire.com/news-releases/gmo-inside-campaign-cheerios-facebook-page-flooded-by-anti-gmo-comments-182410021.html>

<sup>9</sup> Seattle Post Intelligencer, Oct. 17 2013, “GMO Labeling Moms React to GMA Money-laundering Lawsuit,” <http://blog.seattlepi.com/videoblogging/2013/10/17/gmo-labeling-moms-react/>

<sup>10</sup> National Public Radio: The Salt Blog, July 22 2014, “Some Food Companies Are Quietly Dumping GMOs Ingredients,” <http://www.npr.org/blogs/thesalt/2014/07/22/333725880/some-food-producers-are-quietly-dumping-gmo-ingredients>





<sup>11</sup> Whole Foods Market, March 8 2013, “GMO Labeling Coming to Whole Foods Market”, <http://www.wholefoodsmarket.com/blog/gmo-labeling-coming-whole-foods-market>

<sup>12</sup> Whole Foods Market, Sep. 18 2013, “GMO Labeling Update”, <http://www.wholefoodsmarket.com/blog/gmo-labeling-update>

<sup>13</sup> Whole Foods Market, March 8 2013, “GMO Labeling Coming to Whole Foods Market”, <http://www.wholefoodsmarket.com/blog/gmo-labeling-coming-whole-foods-market>

<sup>14</sup> Center for Food Safety, 2014, “International Labeling Laws”, <http://www.centerforfoodsafety.org/issues/976/ge-food-labeling/international-labeling-laws>

<sup>15</sup> CNN, May 8 2014, “Vermont governor signs GMO food labeling into law,” <http://www.cnn.com/2014/05/08/health/vermont-gmo-labeling/index.html>

<sup>16</sup> Fox Business, February 3 2015, “Hawaii County Council considers free legal help to defend genetically modified crop law,” <http://www.foxbusiness.com/markets/2015/02/03/hawaii-county-council-considers-free-legal-help-to-defend-genetically-modified/>

<sup>17</sup> Reuters, May 21 2014, “Rural Oregon voters back ban on GMO crops amid U.S. labeling uproar,” <http://www.reuters.com/article/2014/05/21/usa-oregon-gmos-idUSL1N00706420140521>

<sup>18</sup> United States Fish and Wildlife Service, July 17 2014, “Memorandum: Use of Agricultural Products in Wildlife Management in the National Wildlife Refuge System,” [http://www.peer.org/assets/docs/fws/FWS\\_Memorandum.pdf](http://www.peer.org/assets/docs/fws/FWS_Memorandum.pdf)

<sup>19</sup> Wesseler, J. and N. Kalaitzandonake, 2011, “Present and Future EU GMO policy,” in Arie Oskam, Gerrit Meesters and Huib Silvius (eds.), *EU Policy for Agriculture, Food and Rural Areas*, Second Edition (Wageningen Academic Publishers)

<sup>20</sup> International Assessment of Agriculture Science and Technology for Development, 2008, *Agriculture at a Crossroads*, [http://www.unep.org/dewa/agassessment/reports/IAASTD/EN/Agriculture%20at%20a%20Crossroads\\_Global%20Report%20\(English\).pdf](http://www.unep.org/dewa/agassessment/reports/IAASTD/EN/Agriculture%20at%20a%20Crossroads_Global%20Report%20(English).pdf)

<sup>21</sup> Benbrook, Charles M, 2012, “Impacts of genetically engineered crops on pesticide use in the U.S. -- the first sixteen years,” (Environmental Sciences Europe) <http://www.sciencedaily.com/releases/2012/10/121002092839.htm>

<sup>22</sup> Food & Water Watch, 2013, *Superweeds: How Biotech Crops Bolster the Pesticide Industry*, [http://documents.foodandwaterwatch.org/doc/Superweeds.pdf#\\_ga=1.128841160.579824097.1403638483](http://documents.foodandwaterwatch.org/doc/Superweeds.pdf#_ga=1.128841160.579824097.1403638483)

<sup>23</sup> House of Representatives Committee on Oversight and Government Reform, Jul. 28 2010, “Are ‘Superweeds’ an Outgrowth of USDA Biotech Policy? (Part I),” <http://oversight.house.gov/hearing/are-superweeds-an-outgrowth-of-usda-biotech-policy-part-i/>

<sup>24</sup> Jack A. Heinemann, Melanie Massaro, Dorien S. Coray, Sarah Zanon Agapito-Tenfen & Jiajun Dale Wen, 2013, “Sustainability and innovation in staple crop production in the US Midwest,” (International Journal of Agricultural Sustainability), <http://sustainablepulse.com/wp-content/uploads/Jack.pdf>

<sup>25</sup> Friends of the Earth, 2010, *The Socio-Economic Effects of GMOs*, [http://www.foeeurope.org/sites/default/files/publications/FoEE\\_Socio\\_economic\\_effects\\_gmos\\_0311.pdf](http://www.foeeurope.org/sites/default/files/publications/FoEE_Socio_economic_effects_gmos_0311.pdf)

<sup>26</sup> Bloomberg, Nov. 4 2009, “Bayer Blamed at Trial for Crops ‘Contaminated’ by Modified Rice,” <http://www.bloomberg.com/apps/news?pid=newsarchive&sid=aT1kD1G0t0N0>

<sup>27</sup> New York Times, Sep. 20 2013, “A Disease Cuts Corn Yields,” [http://www.nytimes.com/2013/10/01/science/earth/a-disease-cuts-corn-yields.html?\\_r=0](http://www.nytimes.com/2013/10/01/science/earth/a-disease-cuts-corn-yields.html?_r=0)

<sup>28</sup> Newsweek, Mar. 18 2014, “Worm Now Thrives in GMO Corn Designed to Kill It, Study Says” <http://www.newsweek.com/worm-now-thrives-gmo-corn-designed-kill-it-study-says-232276>

<sup>29</sup> *Op. id.*, Center for Food Safety, 2012

<sup>30</sup> Mortensen, D.A. et al, 2012, “Navigating a Critical Juncture for Sustainable Weed Management” (BioScience), <http://www.jstor.org/discover/10.1525/bio.2012.62.1.12?uid=3739560&uid=2&uid=4&uid=3739256&sid=21103567216211>

<sup>31</sup> Altieri, M.A., 2000, “Modern Agriculture: Ecological impacts and the possibilities for truly sustainable farming” (Agroecology in Action), [http://nature.berkeley.edu/~miguel-alt/modern\\_agriculture.html](http://nature.berkeley.edu/~miguel-alt/modern_agriculture.html)

<sup>32</sup> Hanzi, Marsha, 2000, “Polycultures in the Brazilian Drylands” (Office of Arid Lands Studies, University of Arizona), <http://ag.arizona.edu/OALS/ALN/aln48/hanzi.html>

<sup>33</sup> Washington Times, “EPA raises levels of glyphosate residue allowed in food,” Jul. 5 2013, <http://communities.washingtontimes.com/neighborhood/world-our-backyard/2013/jul/5/epa-raises-levels-glyphosate-residue-allowed-your-/>

<sup>34</sup> Benachour, N. and G.E. Séralini, 2009, “Glyphosate Formulations Induce Apoptosis and Necrosis in Human Umbilical, Embryonic, and Placental Cells” (Chemical Research in Toxicology), <http://pubs.acs.org/doi/abs/10.1021/tx800218n>

<sup>35</sup> United Kingdom Health and Safety Executive, Expert Committee on Pesticide Residues in Food (PRiF), Pesticide Residues Committee, *Pesticide Residues Monitoring Report: Third Quarter*, Mar. 10 2010, [http://www.pesticides.gov.uk/Resources/CRD/igrated-Resources/Documents/Other/2010\\_Q3\\_Report.pdf](http://www.pesticides.gov.uk/Resources/CRD/igrated-Resources/Documents/Other/2010_Q3_Report.pdf)

<sup>36</sup> GM Freeze, *Glyphosate Residues in UK Food 2011, 2012*, [http://www.gmfreeze.org/site\\_media/uploads/publications/glyphosate\\_residues\\_in\\_UK\\_food\\_final.pdf](http://www.gmfreeze.org/site_media/uploads/publications/glyphosate_residues_in_UK_food_final.pdf)

<sup>37</sup> National Family Farm Coalition, *Out of Hand: Farmers Face the Consequences of a Consolidated Seed Industry*, 2009, <http://farmertofarmercampaign.com/Out%20of%20Hand.FullReport.pdf>

<sup>38</sup> United Nations World Commission on Environment and Development, Dec. 11 1987, *Report of the World Commission on Environment and Development*, <http://www.un.org/documents/ga/res/42/ares42-187.htm>

<sup>39</sup> Oxford Scholarship Online, Accessed Mar. 26 2014, “Poverty and Famines: An Essay on Entitlement and Deprivation,” <http://www.oxfordscholarship.com/view/10.1093/0198284632.001.0001/acprof-9780198284635>

<sup>40</sup> Rodale Institute, 2011, *The Farming Systems Trial: 30-Year Report*, <http://rodaleinstitute.org/our-work/farming-systems-trial/farming-systems-trial-30-year-report/>

<sup>41</sup> United Nations Food and Agricultural Organization, 2007, “Meeting the Food Security Challenge Through Organic Agriculture,” <http://www.fao.org/NEWSROOM/EN/news/2007/1000550/index.html>





---

<sup>42</sup> *Op. id.*, International Assessment of Agriculture Science and Technology for Development, 2008

<sup>43</sup> United Nations Commission on Trade and Development, 2013, *Trade and Environment Review*, [http://unctad.org/en/PublicationsLibrary/ditcted2012d3\\_en.pdf](http://unctad.org/en/PublicationsLibrary/ditcted2012d3_en.pdf)

<sup>44</sup> *Op. id.*, Center for Food Safety, 2012

<sup>45</sup> Draft – Board of Directors Statement in Opposition to Proposal of Genetically Modified Ingredients Report. Abbott Laboratories. Provided to As You Sow by Abbott Laboratories on February 11, 2015. P. 1

<sup>46</sup> Board of Directors Statement in Opposition, p. 1

<sup>47</sup> Board of Directors Statement in Opposition, p. 1

<sup>48</sup> New York Times, July 27 2013, “Strong Support for Modified Foods,” [http://www.nytimes.com/2013/07/28/science/strong-support-for-labeling-modified-foods.html?\\_r=3&&gwh=D5B7AC4AB592DE4BB119357F93E99FB8&gwt=pay](http://www.nytimes.com/2013/07/28/science/strong-support-for-labeling-modified-foods.html?_r=3&&gwh=D5B7AC4AB592DE4BB119357F93E99FB8&gwt=pay)

<sup>49</sup> Consumers Union, 2014, “New Consumer Reports Poll Shows Consumer Demand for Strong Federal Standards for Genetically Engineered Food,” <http://www.commondreams.org/newswire/2014/06/09-2>

<sup>50</sup> Center for Food Safety, 2012, “GMO (GE) Labeling Polls,” <http://www.cga.ct.gov/2012/ENVdata/Tmy/2012HB-05117-R000222-Fairfield%20Green%20Food%20Guide,%20LLC---Analiase%20Paik5-TMY.PDF>

<sup>51</sup> David Knowles. Oct 20 2014. “Oregon’s GMO Labeling Initiative Sets Record.” Bloomberg Politics.

<http://www.bloomberg.com/politics/articles/2014-10-20/oregons-gmo-labeling-initiative-sets-record>

<sup>52</sup> Jim Brunner. Nov 15 2013. “State’s 2013 voter turnout lowest in a decade.” The Seattle Times.

[http://seattletimes.com/html/politics/2022269742\\_voterturnoutxml.html](http://seattletimes.com/html/politics/2022269742_voterturnoutxml.html)

<sup>53</sup> Board of Directors Statement in Opposition, p. 1

<sup>54</sup> Board of Directors Statement in Opposition, p. 2

<sup>55</sup> Center for Food Safety, 2012, *Going Backwards: Dow’s 2,4-D-Resistant Crops and a More Toxic Future (Food Safety Review, Winter 2012)*, <http://www.centerforfoodsafety.org/reports/1787/food-safety-review-going-backwards-dows-2-4-d-resistant-crops-and-a-more-toxic-future>

<sup>56</sup> Benbrook, Charles M, 2012, “Impacts of genetically engineered crops on pesticide use in the U.S. -- the first sixteen years,” (Environmental Sciences Europe) <http://www.sciencedaily.com/releases/2012/10/121002092839.htm>

<sup>57</sup> Food & Water Watch, 2013, *Superweeds: How Biotech Crops Bolster the Pesticide Industry*,

[http://documents.foodandwaterwatch.org/doc/Superweeds.pdf#\\_ga=1.128841160.579824097.1403638483](http://documents.foodandwaterwatch.org/doc/Superweeds.pdf#_ga=1.128841160.579824097.1403638483)

<sup>58</sup> Board of Directors Statement in Opposition, p. 2