

Whole Foods Market Non-GMO Claims Policy

Non-GMO Label Claims for All Locations in U.S. and Canada

At Whole Foods Market, in addition to suppliers complying with USDA and Canada bioengineered food standards (see below), we require that all non-GMO label claims be third-party verified or certified to a Whole Foods Market-approved program. This applies to all products we sell in our U.S. and Canada stores, regardless of where they were made.

New products and products in development choosing to make a non-GMO claim must be third-party verified to a Whole Foods Market-approved program before they are on shelf. For products making a non-GMO claim and already on shelf we are aligning our compliance deadline with the USDA Standard's deadline of January 1, 2022. Products sold in U.S. stores that choose not to get third-party verified will need to remove their non-GMO claims by January 1, 2022. Products sold in Canada stores that choose not to get third-party verified will need to remove their non-GMO claims by January 1, 2023.

Additionally, we will not promote or advertise an item as non-GMO unless it has third-party verification to a Whole Foods Market-approved program and the program name is included in the marketing copy.

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

- USDA or Canada Organic (or other equivalent organic programs)
- The Non-GMO Project
- NSF Non-GMO*

In addition, we permit the use of the Nutrasource iGen Tier 3 non-GMO certification program for dietary supplement products only. Please see the Dietary Supplements section below for more detail.

* Please note that as of September 15, 2020, NSF began winding down the NSF Non-GMO Certified program with a program retirement plan that concludes December 31, 2022. Whole Foods Market will continue to accept NSF Non-GMO certification until December 31, 2022, after which products bearing the NSF Non-GMO logo can no longer be sold to Whole Foods Market. Any products already sold into stream of commerce by December 31, 2022 may continue to bear the NSF Non-GMO label.

Whole Foods Market will require suppliers to submit documentation of product non-GMO verification at our request.

Dietary Supplements

Nutrasource iGen is a tiered program that relies on finished product testing (Tier 1) and source material testing (Tier 3) to verify the absence of GMO DNA and proteins.

A non-GMO claim supported by source material testing is only allowed on products that are iGen Tier 3 certified.

A non-GMO tested claim supported by finished product testing will only be allowed on the back panel of dietary supplements that are iGen Tier 1 tested or tested and verified by a Whole Foods Market-approved lab or testing program.

- For tested products, non-GMO seals and language are prohibited on the Principal Display Panel (PDP).
- Accompanying language must specify that any non-GMO claims are based on testing.
- Testing must be performed by an ISO 17025 accredited lab, using testing methods within the scope of the ISO 17025 accreditation, and target all relevant GMO/BE/GE events.

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 prohibited 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 language on PDP or back panel.

Regulatory Compliance for Disclosure of Bioengineered Foods

United States

In December 2018, the USDA published its [National Bioengineered Food Disclosure Standard](#) (the USDA Standard), which requires food manufacturers to disclose the presence of bioengineered (BE) ingredients. Products sold in our U.S. stores must be compliant with the USDA Standard by the compliance deadline of January 1, 2022.

Canada

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. Products sold in our Canadian stores must be compliant with this standard.

United Kingdom

The European Union (EU) requires mandatory labeling of GMO ingredients in food products.