



WHEREAS: Kellogg has committed to responsibly source several crops, including wheat, to protect environmental and public health. We commend this work and recommend additional action from Kellogg on glyphosate use.

Glyphosate, a popular weed-killer, was classified last year as “probably carcinogenic in humans” by the world’s leading cancer authority, the World Health Organization’s International Agency for Research on Cancer (IARC). Similarly, the California Environmental Protection Agency’s Office of Environmental Health Hazard Assessment has issued a notice of intent to list glyphosate as a chemical “known to the state” to cause cancer. Research demonstrates that glyphosate-based herbicides may cause chronic toxic effects, such as kidney damage and endocrine disruption, even at low levels, especially when combined with other ingredients used in herbicides.

Glyphosate use has soared in the last two decades, and with it, concerns regarding glyphosate’s environmental and public health impacts. For example, agricultural workers have filed several personal injury law suits with Monsanto for harms associated with glyphosate use, and legal experts report that this could be the beginning of mass tort actions on the pesticide.ⁱ Increasing residues of glyphosate on food are highly controversial; in 2013, the EPA raised allowable glyphosate levels in food from several crops, and received over 10,800 comments against the proposed change. Researchers have also begun linking glyphosate use with the dramatic decline in the monarch butterfly population, by killing wild milkweed plants.

One particular new use of glyphosate has come under heightened scrutiny for its harmful impacts. Pesticide producers have begun encouraging farmers to apply glyphosate shortly before harvest of certain crops, including wheat, other grains, beans, and oilseeds. For example, 99% of garbanzo beans grown in Washington State are now treated pre-harvest with glyphosate.ⁱⁱ

Applying glyphosate pre-harvest kills foliage and promotes drying, which makes harvesting easier, especially in wetter climates. However, it also increases glyphosate residues on foodⁱⁱⁱ and can increase glyphosate drift onto nearby crops. Austria and Germany have explicitly banned pre-harvest glyphosate use; other European countries such as France and Italy have not approved the practice.

RESOLVED: Shareholders request that the Board publish a report, within one year of the annual meeting, at reasonable expense and omitting proprietary information, that discusses the Company’s options for adoption of policies, above and beyond legal compliance, to prevent or minimize environmental and public health harms from glyphosate.

Supporting Statement: We recommend that the report, at a minimum, include:

- An assessment of the supply chain, operational, and reputational risks posed to the company by the large-scale use of pre-harvest glyphosate; and
- Quantitative metrics tracking the portion of supply chain crops treated with glyphosate.

ⁱ Reuters, 10/15/15, “U.S. lawsuits build against Monsanto over alleged Roundup cancer link”

ⁱⁱ USDA National Agricultural Statistics Service 2013

ⁱⁱⁱ Charles Benbrook 2016