



**WHEREAS:** Walgreen's Well Beginnings™ Advantage® infant formula has been reported to contain engineered hydroxyapatite (HA) nanoparticles in both needle-like and non-needle-like forms, according to independent laboratory testing commissioned by the non-profit Friends of the Earth.

The E.U. Scientific Committee on Consumer Safety (SCCS) has determined that nano-HA may be toxic to humans and that the needle-form of nano-HA should *not* be used in products (SCCS/1566/15). Additionally, manufacturer warnings suggest nano-HA may pose an inhalation hazard -- making dry formula potentially dangerous for both babies and parents.

Companies that use, intend to use, or simply allow the use of nanomaterials face significant financial, legal, and reputational risk. This is even more likely when the safety of the nanoparticle has been raised by regulatory bodies and is being used in infant formula since infants are especially vulnerable.

HA is likely being used as a calcium supplement; there are alternative calcium sources that do not carry the same risk, which Walgreens can and should use in its infant formula.

Nanotechnology is the science of manipulating matter at the molecular scale to build structures, tools, or products. While nanotechnology allows the creation of new particles and devices, the scientific community has raised serious questions about the safety of nanoparticles to health, especially inorganic and engineered particles.

Research suggests that nanoparticles' small size makes them more likely to enter cells, tissues, and organs where they may interfere with normal cellular function and cause inflammation, damage, and cell death (Trouiller 2009; Lai 2008; Gerloff 2009; Tassinari 2013; Gui 2013; Lucarelli 2004).

There is no consensus on what size is safe, or what long-term effects these materials may have. The FDA has not enacted regulations to protect consumer health related to the use of nanomaterials in food, but has issued guidance stating:

- Nanoparticles can have chemical, physical, and biological properties that differ from those of their larger counterparts; and
- "We are not aware of any food ingredient. . . intentionally engineered on the nanometer scale for which there are generally available safety data sufficient to serve as the foundation for a determination that [its] use . . . is GRAS [Generally Recognized As Safe]."

Food companies such as Starbucks, Panera Bread, Dunkin Donuts, and Krispy Kreme are beginning to replace and/or avoid nanomaterials in their food products.

**RESOLVED:** Shareholders request the Board publish, within 12 months of the annual meeting, at reasonable cost and excluding proprietary information, a report on potential health hazards of nanomaterials, identifying the types of the company's products or packaging that currently contain nanoparticles, and stating any actions management is taking to reduce or eliminate health and environmental impacts, such as eliminating the use of such nanomaterials until or unless they are proven safe through long-term testing.