



CEO Stefano Pessina
Walgreens Boots Alliance
108 Wilmot Rd.
Deerfield, IL 60015

January 12, 2016

Dear Mr. Pessina,

On behalf of our millions of members in the United States, the United Kingdom, and around the world, we are writing to invite Walgreens Boots Alliance to join us in helping ensure protection of Antarctica’s pristine oceans and marine life by removing omega-3 health supplements made from Antarctic krill from your shelves.

Our research indicates that Walgreens Boots Alliance companies sell a variety of krill-based omega-3 products. At Walgreens, these include Schiff’s MegaRed, PureLife Naturals, Sundown Naturals, Finest Nutrition, Natures Bounty, Swisse, Barlean’s Organic Oils, Nature’s Way EfaGold, Healthy Origins, Doctor’s Best, Olympian Labs, Muscletech Platinum, Omega Works Red Krill, Webber Naturals, 21st Century, Jarrow Formulas, Life Extension, and Walgreens brand. At Boots, these include Vitabiotics, Bioglan, MegaRed, Swisse, This Works, and Boots brand. We are writing to ask Walgreens Boots Alliance to join industry leaders like Sainsbury’s, ASDA, Whole Foods, and Trader Joe’s in immediately withdrawing from sale products made from Antarctic krill, such as krill-based omega-3 health supplements. We also ask your company to adopt a corporate policy to safeguard Antarctica that prohibits the sale of Antarctic krill-based omega-3 supplements and other products.

Last spring, SumOfUs released a report, enclosed within, entitled *Vacuuming Antarctica for Krill: The Corporations Plundering the Earth’s Last Frontier*¹, which details the important role krill play in the Antarctic marine ecosystem as the primary food source for seabirds and marine mammals including penguins, seals and whales. Krill are especially crucial for the recovery of the blue whale population, which relies entirely on these tiny crustaceans to fuel their giant 200-ton bodies. Krill are also playing an important role in slowing global warming by transporting carbon dioxide from the surface to the deep water. According to the British Antarctic Survey and the University of Hull Scarborough Center of Coastal Studies the amount of carbon dioxide that krill reduce in the oceans is equal to that

¹ https://s3.amazonaws.com/s3.sumofus.org/images/Krill_report_SumOfUs_2015.pdf. See also SumOfUs’ accompanying video: <https://www.youtube.com/watch?v=3e5oXMHDbC8>

produced by 35 million cars.² In fact, krill are so vital that the United States banned krill fishing off of the Pacific Coast in July 2009 to protect the marine ecosystem there.³

Studies show that Antarctic krill populations have declined by 80% over the past four decades due to the impacts of climate change.⁴ Antarctica's rapid sea ice retreat is reducing the krill's primary food source--the algae that grow under the ice. Ocean acidification is causing reproductive disturbance for the krill. Studies demonstrate that reductions in krill populations have led to a 50% decrease in two penguin populations in Antarctica.⁵ Increasingly, malnourished whales and seals are washing up on coastlines, which experts attribute to this decline in the krill population⁶.

Adding insult to injury, the catch of the Antarctic krill fishery is growing rapidly due to new technologies that improve "efficiency"; such as a giant pump targeted at huge plumes of krill that are the same as those targeted by krill's predators. Sea ice melt has also elongated the fishing season into the winter. Alarming, China has announced plans to increase its catch of Antarctic krill seven-fold⁷.

Two major suppliers of krill-based omega-3 products boast Marine Stewardship Council (MSC) certification. However, numerous objections were lodged against the MSC certification by leading environmental groups⁸ including the Antarctic and Southern Ocean Coalition (ASOC)⁹, which represents Greenpeace, Oceana, and many other NGOs around the world. Pew Environment Group¹⁰ stated: "In its decision, the MSC ignored irrefutable evidence put forward by numerous stakeholders including prominent Antarctic scientists, climate change and forage fishery experts and environmental groups."

The objections to the MSC certification are numerous: First, the catch limits set for "sustainable" harvest of krill are based off of population assessments conducted fifteen years ago, and do not take into account the impacts of climate change on the krill population over this time or projected into the future, despite krill's known sensitivity to sea ice decline and ocean acidification. Second, very little is known about krill populations and what drives their increase or decline so it is impossible to determine sustainable harvesting based on known information. Third, the MSC's process was fundamentally flawed by certifying single operators rather than taking into account the behavior of the fishery as a whole, nor the needs of predators in localized areas. Fourth, the MCS certification for krill is in contravention to the Food and Agriculture Organization's Code of Conduct for Responsible Fisheries, which says, "states should encourage the use of fish for human consumption." Despite providing over 90% of the caloric content of the Antarctic marine ecosystem, krill is being taken for aquaculture, pet food, and health supplements, not as a direct source of human nutrition. Fifth, much concern exists about the robustness of the MSC itself. A recent study found that 31% of fisheries certified by MSC were overfished.¹¹ Finally, there is much controversy over the very premise that any industrial scale fishery operating in one of the only marine refuges left near land uninhabited by humans, already besieged by climate change, could be deemed "sustainable"¹².

We are encouraged by Walgreens Boots Alliance's commitment to corporate responsibility across its many retail divisions. Walgreens has stated that "environmental sustainability is part of Walgreens'

² <http://www.sciencedaily.com/releases/2006/02/060206230630.htm>

³ http://www.oregonlive.com/environment/index.ssf/2009/07/noaa_bans_krill_fishing_to_sav.html

⁴ <http://www.ncbi.nlm.nih.gov/pubmed/21482793>

⁵ *ibid.*

⁶ <http://www.takepart.com/article/2015/06/18/humpback-whales-exhausted-climate-change>

⁷ <http://en.mercopress.com/2015/04/30/beware-china-announces-plan-to-seven-fold-increase-antarctic-krill-catches>

⁸ http://www.nytimes.com/2010/06/23/science/earth/23krill.html?_r=0

⁹ <https://www.msc.org/track-a-fishery/fisheries-in-the-program/certified/southern-ocean/aker-biomarine-antarctic-krill/assessment-downloads-folder/2009.12.04-%20ASOC%20Objection%20to%20the%20Antarctic%20Krill%20Fishery.pdf>

¹⁰ <http://www.pewtrusts.org/en/about/news-room/press-releases/2010/05/25/pew-faults-marine-stewardship-counciland39s-decision>

¹¹ <http://oceanrep.geomar.de/14215/>

¹² <http://www.greenpeace.org/usa/license-to-krill/>

commitment to help our customers live well, stay well, and get well.” Boots’ Environmental Policy says that “caring for the environment has always been... one of the core values of our brand” and lists sustainable sourcing as a top priority for its environmental efforts¹³.

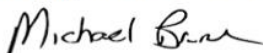
We are sure that whale starvation and destruction of Antarctica’s pristine marine ecosystem is not in line with Walgreens Boots Alliance’s reputable brand, and we hope we can work constructively with you to disassociate your company from these dangerous practices.

We request a meeting to discuss this matter further, and would be happy to meet at Walgreens Boots Alliance’s headquarters in Deerfield, IL at your earliest convenience. We would appreciate a response to this letter by January 25, 2016. You may contact us at kdurquiza@gmail.com or 415-867-7619.

Sincerely,



Kristin Urquiza
Director, Lifeline Antarctica



Michael Brune
Executive Director, Sierra Club



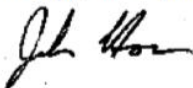
Wenonah Hauter
Executive Director, Food and Water Watch



Allan Thornton
President, Environmental Investigation
Agency



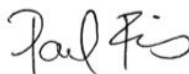
Jeff Hansen
Director, Sea Shepherd



John Hocevar
Oceans Campaign Director, Greenpeace



Marcie Keever
Oceans & Vessels Program Director, Friends
of the Earth



Paul Ferris
Campaign Director, Sum of Us



John Hourston
Founder, Blue Planet Society



John Stewart
Deputy Campaigns Director, Corporate
Accountability International



Rachel Kippen
Director of Programs, Save Our Shores

Cc:

Ornella Barra, Executive Vice President of Walgreens Boots Alliance, President and Chief Executive of Global Wholesale and International Retail, and Chair of the Walgreens Boots Alliance Social Responsibility Meeting

Alex Gourlay, Executive Vice President of Walgreens Boots Alliance, and President of Walgreens

Simon Roberts, Executive Vice President of Walgreens Boots Alliance, and President of Boots

¹³ http://www.boots-uk.com/Corporate_Social_Responsibility/media/App_Media/BUKCSR2013/Home/pdf/Environment_policy.pdf