

Contents

1. **KEY CONTACTS AND BACKGROUND**
 - a. Activist approach
 - b. Communication objectives
 - c. Key audiences
 - d. Approach Overview
2. **PREVIOUS STATEMENTS AND RESPONSES**
 - a. General Responsive Media Statement
 - b. Interactions with academics on outreach programs
 - i. Collaboration and sharing of resources
 - ii. David Shaw
 - iii. Bruce Chassy
 - iv. Nina Fedoroff
 - v. Eric Sachs
 - c. Unrestricted Grants to Universities
 - i. Bruce Chassy and Kevin Folta
 - ii. Nina Fedoroff and David Shaw
 - iii. USak
 - iv. UC Davis
 - d. Unrestricted Grants from our TD organizations
 - e. Service Orders
 - f. Expectation of Academics
 - g. Disclosure of Grants
 - h. Misinformation
 - i. Glyphosate as a desiccant / Seneff / Gluten allergy
 - ii. Discredit Bureau (response to opinions on Seralini)
 - i. Reputation work
 - i. Our work with food companies
 - j. Misc. Q&A
3. **ALLERGEN ONLINE RESPONSE PLAN**
 - a. Allergen Database Background
 - b. Media Strategy
 - c. Key Messages
 - d. Media Statement
 - e. Mosanto.com resources
 - f. General Questions on Database
 - g. Questions on Shift to ILSI/HESI
 - h. Questions on Dr. Richard Goodman
 - i. Misc. Questions
4. **PROACTIVE PLAN & RESOURCES**
 - a. General Proactive Strategy
 - i. General Proactive Communications Materials
 - ii. Key Q&A
 - iii. Relevant Links

COMPREHENSIVE USRTK FOIA PREPAREDNESS AND REACTIVE PLAN
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 DRAFT 5.15.16
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- b. Proactive Public Private Partnership Materials
 - i. Infographics and blogs/op-eds both by MON and industry partners
- c. Proactive Allergenicity Materials
 - i. Infographic and blog/op-eds – organized by MON distributed by GMOA
 - ii. HESI proactive approach and materials
- d. Proactive Training
 - i. Training for independent experts via GMOA
 - ii. Internal MON training, and partnership training on Smart Communications
- e. Transparency Audit and direction

5. **USRTK ADDITIONAL BACKGROUND**
 a. Carey Gillam Strategy/Approach

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Background

U.S. Right to Know (USRTK), an activist NGO that opposes the biotech industry, has submitted requests under state open records laws to academics at four universities: the University of Illinois, University of Florida, University of California-Davis and University of Nebraska-Lincoln. The requests seek copies of emails and other correspondence to and from the academics and representatives of Monsanto, BIO, CBI, various PR agencies and other companies involved in the ag-biotech space. USRTK plans to use information in these communications to attack Monsanto and the industry. The time period for the request begins Jan. 1, 2012, and runs through the date of the request.

Activist Approach

USRTK founder Gary Ruskin has a history of exploiting open records laws to expose what he perceives as corruption or undue influence. He requests massive amounts of information, takes isolated pieces of information out of context, and then strings pieces of information together in news releases and other communications to paint a negative picture. He has stated his intention to “publish articles” on his website in a similar way with these records.

Generally, those who seek to attack others by exploiting open records laws will take one of two approaches:

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Scenario A – “Litany of Grievances”

- Gather and review documents; identify several lines of attack based on individual themes, events or personalities
- Craft a unique storyline around each theme; develop that storyline through a news release, social media content, etc.
- Release each storyline over a period of weeks in an attempt to prolong coverage and drag out the attack

Scenario B – “Data Dump”

- Review all the documents collected and develop on comprehensive “report” that touches on numerous themes, individuals or events – all revolving around a central hypothesis of corruption, undue influence and unethical activity
- Publish the report online – simultaneously, post all documents collected and invite others to review
- Amplify the report and “data dump” through a blitz of mainstream and social media activities

Monsanto Communication Objectives

- Protect our reputation and FTO by **proactively** providing context for the legitimate, appropriate and positive collaboration between Monsanto, industry and these academics
- Protect these valuable stakeholder relationships by allowing the academics to see us standing up on their behalf in support of scientific and academic freedom
- Standing with the industry, position this activist tactic as an attack on scientific integrity and academic freedom
- Condemn any publication of Monsanto business confidential information
- Distance Monsanto from any inappropriate or immature comments or unethical behavior by individual employees

Key Audiences

- Media / general public
- Academic researcher & allies (those included in FOIA & others)
- Monsanto employees (those included in FOA & others)
- Industry & societal stakeholders
- Regulators

Overview of Approach

Our approach consists of several proactive and reactive tactics:

1. Reactive Statements to specific allegations
 - a. General PR Allegations
 - b. Allegations around Allergenicity Database & Rick Goodman
2. Proactive Materials
 - a. Proactive Public Private Partnership Materials
 - i. Infographics and blogs/op-eds both by MON and industry partners
 - b. Proactive Allergenicity Materials
 - i. Infographic and blog/op-eds – organized by MON distributed by GMOA

- c. Proactive Training
 - i. Training for independent experts via GMOA
 - ii. Internal MON training, and partnership training on Smart Communications

Previous statements and responses: FOIA questions

Updated February, 25, 2016

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General Responsive Media Statement

Provided reactively to media inquiries – may also point media to website materials

Our company is helping develop new tools and solutions to help farmers produce more robust harvests, while reducing the impact on the environment. Among many other partners, we're proud to collaborate with world-class researchers at major universities on these important efforts.

While we respect open-records laws as a vital safeguard in a democratic society, we fear that this particular request is an attempt to silence leading scholars in the field of agricultural biotechnology. These independent researchers are some of the best and brightest minds in agriculture and plant science. We fully stand by our professional relationship and collaboration with each of them, and we see these records requests as little more than academic bullying.

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The universities in question will review the requests from U.S. Right to Know and will make decisions about what documents, if any, they will release in accordance with state laws, including laws that protect the release of businesses' confidential information. We expect the universities to fully respect all protections afforded to our intellectual property by applicable laws, contracts and other provisions.

You can review our complete response to these open-records requests at [LINK](#). In addition, we invite everyone to learn more about the work we're doing at Monsanto by visiting discover.monsanto.com

Our Interactions with Academics on Outreach Programs:

High Level Messages

- Monsanto is a strong advocate for science and science education, and we are supportive of programs that increase awareness and understanding of science and technology.
- We see public-private collaborations as essential to the advancement of science, innovation and agriculture. We fully stand by our professional relationships and collaborations, and have shared information about how we [collaborate with academics and universities](#) on our web site.
- If you would like us to respond to questions about any specific emails, please let me know. We are willing to work with our colleagues to get background on the discussion and provide you with context.

Within agriculture, the relationships between the public and private sector are critical and have existed for decades. We see public-private collaborations as essential to the advancement of science, as well as to educating and sometimes correcting misinformation the public has about plant biotechnology. It is part of the public sector's role to have knowledge within their discipline and to communicate that knowledge to the public; in fact, it is one element in the consideration of professors for tenure. They serve a very important and well-defined role in serving the greater public good.

At Monsanto, we communicate and exchange ideas with dozens of public sector scientists on matters of common interest. The vast majority of those relationships do not involve any funding; they are about exchanging scientific information, sharing different perspectives, and ultimately enabling complementary efforts where our common interests align.

For example, both public and private sector scientists in the field of agriculture have a mutual interest in regulatory systems that are predictable, risk based and enable delivery of innovative solutions to farmers around the world. It is in the public interest for academics to weigh in credibly, not only to consumers but, to stakeholders like lawmakers and regulators, as well. In these instances, we may work with academic experts who share our science-based views to advocate for supportive policies, regulation and laws that are based on the principles of sound science.

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Our goal is to elevate the public dialogue and public policy discussion from its over-emphasis on perceived risks toward a broader understanding of the societal benefits of GM crops and needed improvement in policies that are unnecessarily limiting innovation in the biotechnology arena. Oftentimes, we share our perspective and flag ideas to indicate our objectives and vision. We know that independent experts may be too busy to engage, or may not agree with our approach; in those cases they often disregard the request or just say no.

- For many scientists in the public sector, their passion is to teach science, to explain what is known or unknown, to talk about the risks and benefits, and to unmask half-truths and critical conclusions that are built on limited data or controversial methods. It is part of their role to have knowledge within their discipline and to communicate that knowledge to the public; in fact, it is one element in the consideration of professors for tenure. They serve a very important and well-defined role in serving the greater public good.

Collaboration or sharing of resources and talking points

We see public-private collaborations as essential to the advancement of science, innovation and agriculture. We fully stand by our professional relationships and collaborations, and have shared information about how we [collaborate with academics and universities](#) on our web site.

David Shaw

- In the case of Dr. David Shaw: We did communicate with Dr. Shaw about the USDA's safety assessment of dicamba-tolerant crops. At that time, USDA was inviting comments from the public, which is a normal part of their process for obtaining information before making a decision whether to allow a new herbicide-tolerant crop for agricultural use. USDA seeks comments from a wide range of interested individuals and groups, including public sector weed scientists that are knowledgeable about the product. We are supportive of that process, and we reach out broadly to stakeholders to make them aware of the government's request for input. Dr. John Soteres was a weed scientist on the scientific outreach team at Monsanto, and he interacted regularly with academics including Dr. Shaw through the professional society – Weed Science Society of America (WSSA). He would have reached out to Dr. Shaw and other weed scientists (as would other members of the Society) to request they submit letters based on their own expertise. Monsanto and many others in the public sector also made comments to USDA in support of the product, and these are all on the public record.

Bruce Chassy

- In the case of Dr. Bruce Chassy: We did communicate with Dr. Chassy about EPA's request for input on their draft proposal to make changes to the data requirements for different forms of GM crops. Elements of the proposed rule changes were of interest to the public and private sector, particularly changes that potentially would increase the

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time and cost of product approval without improving the quality or rigor of the risk assessment.

Nina Fedoroff/ Bruce Chassy / Eric Sachs

- Dr. Chassy and Dr. Nina Fedoroff were preparing comments to EPA on behalf of the public sector and reached out to Dr. Eric Sachs for input. Dr. Sachs was working separately with the private sector to submit comments on behalf of industry. This is a good example of public and private sector experts sharing information that is relevant to both parties and that would help the EPA to take informed actions when amending their regulatory process. The comments provided to EPA by Dr. Fedoroff/Dr. Chassy and by the industry are available and on the public record. The academics also published an op-ed in a journal entitled, [*EPA's Proposed Biotech Policy Turns a Deaf Ear to Science*](#). It is important to note that EPA elected not to take further action at the time and has not finalized their proposed rule to date.
- Eric is the Strategic Engagement Lead for Monsanto. He is responsible for ensuring that policy makers, regulatory authorities, and the public are informed about the safety and benefits of our products. My role includes building relationships and collaborating with scientists in the public and private sectors that communicate about agriculture, food, health and the environment.

Unrestricted Grants to Universities:

Biotech outreach programs exist at numerous universities nationwide, such as University of California Davis, Iowa State University, University of Illinois, University of Missouri, George Mason University, North Carolina State University, and Michigan State, to name a few.

Similarly, we support fellowships for graduate students, enable scientists to travel and participate in scientific conferences, provide grants to scientific conferences to help cover meeting expenses, speaker travel, auditorium fees, and other costs. In all of these cases where money is involved, recipients typically document and in some cases acknowledge our support of their programs.

A grant of this nature is important to the academics to ensure their independence and limit any formal requirements that might otherwise attach to their outreach efforts.

However, it is important to note that unrestricted grants remain subject to all university policies and procedures and are administered by the university. They are beneficial to a researcher's ongoing program because it ensures their independence; we cannot make any formal requirements on the research and we cannot make any claims to any intellectual property rights that may result.

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Monsanto on occasion has provided grants to fund outreach programs by academics like **Dr. Kevin Folta and Dr. Chassy** through unrestricted grants to their respective universities. We do this because public sources of funding are too often limited, and university outreach programs can increase consumer awareness and knowledge about agriculture and GMOs.

We fully stand by our professional relationships and collaborations, and have shared information about how we [collaborate with academics and universities](#) on our web site.

Kevin Folta

- Regarding Dr. Folta, as we mentioned, we are a strong advocate for science and science education, and we were supportive of his outreach program because it was designed to increase awareness and understanding of science and technology.
- We funded Dr. Folta's proposal through an unrestricted grant to the University of Florida with no strings attached – which means we cannot make any formal requirements on how the funds are used nor the content of his program. The University of Florida and Dr. Folta decided to use the funds to support a campus food pantry instead of outreach. While the overall situation is unfortunate, we are supportive of Dr. Folta's and the University's decision. We often support nonprofit organizations that help with critical community needs such as food security, and we are glad these funds are going to a good cause.
- A grant of this nature is important to the academics to ensure their independence and limit any formal requirements that might otherwise attach to their outreach efforts. However, it is important to note that unrestricted grants remain subject to all university policies and procedures and are administered by the university.
- We were happy to support Dr. Folta's outreach program to increase understanding of biotechnology, because we always have been a strong advocate for science and science education, and we are supportive of programs that increase awareness and understanding of science and technology.
- The program that Dr. Folta developed is an example of a great program for public-private collaboration. He was already doing it – just on a smaller scale. The challenge he faced is that it would cost money to expand, and that is how the private sector could help.

Bruce Chassy

- Regarding Dr. Chassy, then Assistant Dean for Biotechnology Outreach, Monsanto provided support for the university's biotechnology outreach program. We provided several gifts (or unrestricted grants) to the University primarily to help fund domestic and international travel associated with biotechnology outreach to scientists, policy makers and the public. These engagements are important because many audiences want to learn from and ask questions of public sector experts that have experience and

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have published scientific articles on a range of topics related to GM crop food safety and environmental impacts.

David Shaw

- The unrestricted grant came from our technology development organization, not from our scientific outreach team of which Dr. Soteres was a member. There were no expectations of Dr. Shaw from either team.

University of Saskatchewan
University of California Davis

Unrestricted Grants from our TD organizations:

Monsanto scientists and agronomists in our technology development organization annually work with roughly 20-25 universities nationwide to evaluate the safety and performance of new products through field trials. These trials are vital to develop important scientific information, to assess the performance of a new trait, and to generate the necessary environmental safety data required by regulatory authorities that evaluate commercial product approvals. We sign contracts with the researchers who conduct these trials, and we pay fees to them and the universities for performing this highly technical research. These would be the service orders that are noted in the email you reference.

On occasion, our technology development organizations may also provide unrestricted grants or gifts to support general needs within these academic departments because their programs are essential to agriculture and farmers within their states. Again, we provide these funds through unrestricted grants or gifts with no strings attached – which means these departments are able to self-assess and select where and how the money is spent with no formal requirements from us on how the funds are used and no expectations of goods or services in return.

Service Orders:

Monsanto scientists and agronomists in our technology development organization annually work with roughly 20-25 universities nationwide to evaluate the safety and performance of new products through field trials. These trials are vital to develop important scientific information, to assess the performance of a new trait, and to generate the necessary data for regulatory authorities that evaluate commercial product approvals. We sign contracts with the researchers who conduct these trials, and we fund them and the universities for performing this highly technical research.

Our Expectation of Academics:

There is no expectation that any academic will act on information or a request from Monsanto.
As we mentioned, Lisa Drake's email to Dr. Folta is a great example of the process. Lisa flagged

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an idea in which she thought he may be interested, and it appears that he wasn't. That is not a unique situation. There was no expectation that he would engage.

Our Disclosure of Grants:

We are always willing to disclose any grant or gift that we provide. We follow the guidance for gifts, grants, research agreements, etc., that is provided by the universities that we fund. While each university handles it differently based on the situation, they typically report funding through their internal reporting mechanisms and often the listings are available on their foundation or public websites.

At times, we may work with a university to issue a press release, which was the case in these press releases from [August](#), [May](#), and [March](#) of this year. These press releases are by their nature public, of course. And, of course, this information also can be requested through the more formal Freedom of Information Act process. We fully stand by our professional relationships and collaborations, and have shared information about how we [collaborate with academics and universities](#) on our web site.

Last, if you would like us to respond to questions about any specific emails, please let me know. We are willing to work with our colleagues to get background on the discussion and provide you with context.

Policy Briefs

At Monsanto, we communicate and exchange ideas with dozens of public sector scientists on matters of common interest. For example, public and private sector scientists in the field of agriculture have a mutual interest in regulatory systems that are predictably examine potential risks and enable delivery of innovative solutions to farmers around the world. It is in the public's interest for university scientists to weigh in credibly, not only to consumers but to stakeholders like lawmakers and regulators, as well. In these instances, we work with scientific experts with knowledge of the science and evidence to promote policies, regulations and laws that are based on the principles of sound science.

Policy briefs offer leading experts in their fields the opportunity to communicate broadly to policy makers, regulators and the public. Monsanto engaged and funded CMA to manage the process of producing the briefs because we wanted the authors to communicate freely and to avoid any misperceptions that might compromise the credibility of the author's voice. There is a lot of misinformation generated by groups who oppose agriculture and biotechnology. That misinformation is not only limited to the science – there is a lot of misinformation about Monsanto as well, including the constant attack on anyone who is supportive of biotechnology being referred to as a “Monsanto shill.” This is a tactic used liberally by individuals and groups who oppose biotechnology to discredit anyone who is supportive (the latest published Monday by USRTK: [A short report on journalists mentioned in our FOIA requests](#)). As I mentioned on the

phone yesterday, no authors were paid for writing briefs and the Genetic Literacy Project was not paid for posting the articles.

Proposing topics for policy briefs

- Monsanto wanted to elevate the public dialogue and public policy discussion from its over-emphasis on perceived risks toward a broader understanding of the societal benefits of GM crops and needed improvement in policies that are unnecessarily limiting innovation in the biotechnology arena. Oftentimes, we share our perspective and flag ideas to indicate our objectives and vision. We know that independent experts may be too busy to engage, or may not agree with our approach; in those cases they often disregard the request or just say no. On the other hand, there is a lot of misinformation generated by groups who oppose agriculture and biotechnology that is affecting the entire sector, and in these cases it is in the public's interest for independent experts to weigh in credibly and point out where the information is incorrect and not supported by the weight of scientific evidence.
- The policy briefs offered leading experts in their fields the opportunity to communicate broadly to policy makers, regulators and the public. The briefs were eventually published by the Genetic Literacy Project because they were relevant to their audience, based on the principles of sound science, and consistent with the GLP mission.

Misinformation

There is a lot of misinformation generated by groups who oppose agriculture and biotechnology. The misinformation is not only limited to the science – there is a lot of misinformation about Monsanto as well. Misinformation is affecting the entire sector, and it is in the public interest for academics to weigh in credibly and point out where the information is incorrect – not only to consumers but to stakeholders like lawmakers and regulators as well. For example, we may work with academic experts who share our science-based views to advocate for supportive policies, regulation and laws that are based on the principles of sound science.

Glyphosate as a desiccant / Seneff / Gluten allergy

The Samsel and Seneff publication from 2013 is an often revisited piece that alleges glyphosate residues are responsible for a surge in Celiac disease. Specifically, that residues from Roundup “commonly” sprayed on wheat in the U.S. pre-harvest causes gluten intolerance. This report has been repeatedly debunked (see Key Points) and the claim that GMOs are somehow linked to celiac disease has been challenged by the [Celiac Disease Foundation](#) itself.

The claims that Roundup agricultural herbicides are commonly doused on wheat crops a few days before harvest is not accurate. It is not routine for U.S. wheat producers to use Roundup, or other formulations of glyphosate, for pre-harvest applications. Although Roundup is labeled

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for pre-harvest applications at least 14 days before harvest as a desiccant or in order to control perennial weeds, it is uncommon for U.S. producers to make that application. As a point of clarification, in Canada it is more common for label-approved pre-harvest applications of Roundup brand herbicides due to the short growing season.

Glyphosate does not cause celiac disease or gluten intolerance. Please visit these resources for more information:

- [Do genetically modified foods cause gluten allergies?](#) Genetic Literacy Project
- [Glyphosate does not cause celiac disease](#), GMOAnswers.com
- [Steve Savage Addresses Samsel and Seneff study, “Glyphosate, pathways to modern diseases II: Celiac sprue and gluten intolerance,”](#) GMOAnswers.com
- [The curious case of the paper that isn’t](#), Beyond the Rows blog

Spraying Roundup on U.S. wheat crops prior to harvest is an uncommon practice; furthermore, according to label directions, wheat farmers must wait to harvest a crop until a minimum of 14 days after a glyphosate-based application.

- [Spraying Roundup over the top of wheat is uncommon](#), Peterson Farm Bros. Facebook post
- [The Truth about Toxic Wheat](#), Prairie Californian
- [Grain of Truth?](#) Snopes.com

Discredit Bureau (debunking Seralini)

At any time a study can be published that has a new finding or draws a new conclusion about one of our products. Our scientists do not just review our own studies – they review the available information about every study involving our products. We must know and understand the research that is being done surrounding our products – regardless of what the results are.

We take every study about our products seriously and approach each one with an open mind. Sometimes we may find that a study has a design flaw, such as a lack of an appropriate control – and we note that when it occurs. But sometimes the finding can be novel and results in a need for additional follow-up.

Product and food safety is our top priority. We are dedicated to the work we do to ensure your family and mine have safe and accessible food to place on our dinner table each night.

- A few people have suggested we act as a “discredit bureau” to respond to science or results we don’t like. But, that’s simply not true.

Research like this is expensive, but following up on the work of other scientists is a huge part of the scientific process in all fields of science and is an essential part of our continued commitment to product safety and stewardship.

Additionally, most of our commercial biotech (GMO) and chemistry products are re-reviewed by global authorities on a routine basis. For renewal of biotech products, one of the requirements is a summary and review of all literature related to the product. So the scientific reviews described above not only expand the breadth of knowledge on our products, but are required by law in several countries. As part of these reviews, regulators scrutinize all of the recently published scientific articles related to the products. They base their re-registration (or renewal) decision on the entire body of data that they review.

Blog: <http://monsantoblog.com/2015/04/07/do-we-review-studies-on-our-products-yep-we-wouldnt-be-doing-our-jobs-if-we-didnt/>

Reputation work

Also, please see “our relationship with academics” above

The industry’s development of programs like [GMOAnswers](#) in 2013 and Monsanto’s launch of our [discover.Monsanto.com](#) website in 2014, represents our willingness to engage with consumers about their increased interest in agriculture and food. Some of the consumer interest may have been driven by labeling campaigns and the resulting misinformation generated during that time. But, the real shift here is our desire and willingness to be more transparent and accessible to consumers.

The industry's collaboration with the public sector has been occurring for decades.

- In **December 2012**, the Council for Biotechnology Information (“CBI”) pulled together a working group to figure out how to increase our transparency with different stakeholders - especially consumers. The CBI discussion focused on how CBI could provide content that truthfully and transparently met consumers’ interest and right to know about plant biotechnology, and that addressed misperceptions about plant biotechnology and food products that contain ingredients from GM crops.
- In **March 2013**, CBI hired Ketchum to develop and lead that transparency effort; and the GMO Answers web site was **launched in July 2013** with a commitment to answer questions about GMOs – no matter what they are. In the last two years, the GMO Answers web site has answered nearly a thousand questions and started engaging with consumers and stakeholders at real time events such as SXSW this past spring.

Misc. Q&A

- **How much has Monsanto or trade associations that you are associated with donated in the last three years to BioFortified and to the Genetic Literacy Project?** You can check with Kate Hall, but we are not aware that CBI has provided any funding to

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BioFortified or Genetic Literacy Project. We also do not fund BioFortified or Genetic Literacy Project.

- **Should we have been more transparent about payment for travel for the academics / financing these scholars?** We follow the guidance for gifts, grants, research agreements, etc. that is provided by the universities that we fund. While each university handles it differently based on the situation, they typically report funding through their internal reporting mechanisms and often the listings are available on their public websites. (A search of the University of Florida's website generated [this list](#) of research grants for example.) Other times, we may work with a university to issue a press release. And, of course, this information also can be requested through the more formal Freedom of Information Act process.
- **The University of Florida lists Monsanto as a "gold donor" to the U of Florida foundation (2013-14). Does that lead to an expectation that their academics will be supportive of GMOs and our products?** I have not been able to secure information to address your mention of Monsanto as a "gold donor." Regarding the second part of your question though, of course not; gifts and grants are not given with any expectations regarding support of particular products or conclusions.
- **Can you release [ABCD] email?** While Dr. [ABCD] emails have been FOIA'd, we would prefer not to be the source of the release of these documents [or the grant proposal outlining the purpose of this grant]. Could you ask Dr. [ABCD] to share that proposal directly with you since you are in contact with him?
- **Is the outreach with academics a new strategy for Monsanto to combat reputation problems?** For decades we've interacted with academics to not only advance science but also to correct misinformation the public has about plant biotechnology. The outreach to academics following the spring of 2013 does not represent a new strategy.
 - We have been polling consumer attitudes for decades. University scientists consistently poll as one of the most trusted resources. Here's a link if you are interested: "Consumer Attitudes about Agricultural Biotechnology" from Winter 2001. <http://ncsu.edu/ffci/publications/2001/v6-n1-2001-winter/consumer-attitudes.php>

Allergen Online Response Plan

Updated March 15, 2016

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- i. Misc. Questions

Allergen Database Background

Monsanto has been one of several companies that have supported Allergen Online (AOL), a database of protein sequences that are either known or putative allergens. This database has been administered by Dr. Rick Goodman at the University of Nebraska, Lincoln (UNL) since 2005. As genomic sequencing technology has become widespread, the number of sequences to be filtered has grown exponentially. All of the companies sponsoring AOL have recently partnered with the Protein Allergy Technical Committee of the ILSI Health and Environmental Sciences Institute (HESI), a non-profit, global scientific organization, to establish a new publically available allergen database built on a cutting-edge, high-throughput bioinformatic pipeline that is reviewed by a diverse group of globally recognized allergy experts, called COMPARE. Monsanto will not be continuing support of the UNL-hosted allergen database in 2016 for the 2017 version of AOL, although PIO & BASF will continue to sponsor AOL, in addition to the new HESI database. This may result in questions from media and other audiences about the new database, why the change is being made, and what impact, if any it has on food safety. The shift from the University of Nebraska to HESI is complicated by the fact, and possibly will attract additional attention, because the anti-GMO activist group, US Right to Know (USRTK), has submitted FOIA requests to UNL for correspondence between industry and Dr. Goodman. Among other things, this correspondence includes Dr. Goodman criticizing the decision to no longer use his services for database administration, and the AOL sponsors (including Monsanto) criticizing Dr. Goodman's administration of the database. It is possible that Monsanto will be asked specifically about Dr. Goodman given this and several other factors: 1) Dr. Goodman is a former Monsanto employee, 2) he frequently interacted with various Monsanto employees on a variety of GMO topics, 3) he was involved in the editorial process by the journal, Food and Chem Toxicology, in their retraction of Seralini's rat study paper, and 4) he provided responses to GMO Answers,.

Media Strategy

There is no advantage in overemphasizing Monsanto's role in the database, and therefore proactive Monsanto communications about the shift of its support from UNL to HESI would be counterproductive. That said, Monsanto should be prepared to answer questions about its role in the project, and – to some extent – questions about topics that might be raised by the FOIA'd emails. These questions should be

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responded to with prepared statements. Where possible, Monsanto should defer to HESI to discuss its database.¹

General guidelines on messaging and tone are as follows.

- Describe in simple terms what an allergen database is. Use “allergen” instead of “protein,” avoid the term “bioinformatics.”
- Note that the database is a publically available tool useful for anyone wanting to research if a protein of interest has sequence similarity to a known or suspected allergenic protein. This is useful to a wide range of scientists: both public-sector and private company developers of genetically engineered plants; , organizations assessing the allergenic safety of proteins in GE plants, including regulatory agencies, academics and NGO’s; and to the broader food industry.
- Emphasize transparency of the development and usage of the HESI database by noting that it is peer-reviewed and open to public access and review.
- Describe in simple terms what HESI is and why it is well-positioned to handle this responsibility – emphasize that the increased amount of available genomic sequences means that databases need to be sufficiently powerful and capable to keep pace.
- Avoid explicit reference to or criticism of Dr. Goodman or the University of Nebraska.

Key Messages

- The safety of our products is our greatest priority.
- We are committed to keeping pace with advances in the field of biological data analysis.
- To keep pace with advances in the field of biological data analysis and the increase of genome sequence publications, we are supporting a new allergen database with the Health and Environmental Sciences Institute (HESI) that will be publicly available in 2017.
- HESI is a global, nonprofit scientific organization where scientists from industry, government, and academia collaborate to share and advance scientific knowledge.
- The database will be a peer-reviewed list of known or suspected food allergens. It will help people in food and agriculture keep known allergens out of the foods they produce.
- As consumers ourselves, we place the highest priority on the safety of our products, and we believe this transition will enhance our data analytics capabilities and ability to ensure product safety.

¹ HESI has announced the database project via press release on their website (<http://www.hesiglobal.org/i4a/pages/index.cfm?pageid=3317>).

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Media Statement

Also appropriate to point queries to Monsanto.com resources

To keep pace with advances in the field of biological data analysis, eight seed companies, including Monsanto, are supporting a new, publicly available allergen database with the Health and Environmental Sciences Institute, a global, nonprofit scientific organization that engages scientists from government, academia and industry to collaborate and advance scientific knowledge.

The database will be a peer-reviewed list of known or suspected allergens. It will help people in food and agriculture keep known allergens out of the foods they produce. It will retain the highest possible quality and reliability and continue to help ensure the safety of our products.

Monsanto.com Resources

The below content is posted to Monsanto.com as an allergenicity landing page

It's natural to care about where our food comes from.

The fact is, biotech crops have been reviewed and tested more than any crop in the history of agriculture and, each time, the result has been the same: they are safe.

Almost two decades in use

Biotech crops were [first introduced in 1996](#). Since then, they have become one of the fastest, most widely adopted agricultural innovations in history. In that time, there has not been one documented case of biotech crops being unsafe for humans or the environment.

How are standards for GM Crop Safety Assessments Established?

There are many highly respected international bodies that develop guidelines to ensure the health of consumers and develop these standards based on the best available science. These agencies include the Food and Agriculture Organization (FAO), the Organization for Economic Cooperation and Development (OECD), World Health Organization (WHO) and Codex Alimentarius Commission within the WHO. They have developed safety assessments and other guidelines on many food related topics such as vitamin supplements, GMOs, food borne illness, food additives, and pesticide residues.

GM crops undergo safety assessments that are more rigorous and thorough than assessments of any other food crop in history. The safety assessment strategy ensures that new GE crops are developed and tested in accordance with different risk assessment strategies and international safety assessment guidelines such as the following:

[World Health Organization – Safety Aspects of Genetically Modified Foods of Plant Origin](#)
[Food and Agriculture Organization – GM Food Safety Assessment](#)
[Organization for Economic Cooperation and Development – Safety Evaluation of Food Derived by Modern Biotechnology](#)
[Codex Alimentarius - Principles for the risk analysis of foods derived from modern biotechnology](#)

[Codex Alimentarius - Guideline for the conduct of food safety assessment of foods derived from recombinant-DNA plants](#)

Who oversees the approval of biotech crops?

Regulatory agencies around the world develop their own national biosafety laws and frameworks, frequently derived from these international standards.

In the U.S., agricultural biotechnology products are regulated by [FDA](#) (Food and Drug Administration), [USDA](#) (United States Department of Agriculture), and for insect-protected crops, the [EPA](#) (Environmental Protection Agency) for Plant-Incorporated Protectants. Data packages are reviewed by these agencies to affirm their safety prior to commercialization. In addition, each of our products has undergone many years of research, field trials and internal approvals before it is submitted for regulatory approval.

To support global trade, safety data also are submitted to authorizing agencies in many countries. As in the United States, in many other nations there is often not just a single regulatory authority, but often several, each with the responsibility of assessing a particular aspect of safety. The extensive safety data are then subjected to review by hundreds of independent risk assessors and scientists across a wide range of disciplines.

Examples of global regulatory frameworks and guidelines are included below:

European Union:

[Council Directive 2001/18/EC](#)

[Regulation \(EC\) 1829/2003](#)

[EU regulatory framework on GMOs](#)

Canada:

[Health Canada - Guidelines for the Safety Assessment of Novel Foods](#)

United States

[FDA - Federal Food, Drug, and Cosmetic Act \(FD&C Act\)](#)

[FDA - Consultation Procedures under FDA's 1992 Statement of Policy - Foods Derived from New Plant Varieties](#)

[EPA - Regulations Under the Federal Insecticide, Fungicide, and Rodenticide Act for Plant-Incorporated Protectants](#)

[USDA – Plant Protection Act](#)

[USDA – Introduction of Organisms and Products Altered or Produced through Genetic Engineering Which Are Plant Pests or Which There Is Reason to Believe Are Plant Pests](#)

Australia

[Gene Technology Act](#)

[Gene Technology Act Regulations](#)

Products Are Only Commercialized Once Safety Is Affirmed.

The product development process for GE crops follows a rigorous process for ensuring the safety of the crops as food, as animal feed, and for any effects on the environment. The safety studies performed throughout the development of these crops have contributed to several important conclusions.

Examples of the Data, Submissions, and resulting regulatory assessments that have been compiled for Monsanto's products can be found here:

[Product Safety Summaries](#)

General Questions on Database

What is the purpose of an allergen database?

The database that will be managed by HESI is a publicly available peer-reviewed tool useful for anyone wanting to conduct research on known or suspected allergens. This is useful to both developers of genetically engineered plants and the broader food industry.

What is the significance of having a peer-reviewed publication about the database?

It is important that the allergen database is not only publicly available, but that there is full transparency about the allergen evaluation and selection process. Documentation of the allergen selection process in a peer-reviewed publication not only ensures transparency, but enables scientific review and scrutiny.

When will the new database be up and running?

Beginning in 2017, The HESI-managed allergen database will provide an up-to-date resource of protein sequences that are known or putative allergens.

How often will the new database be updated?

As with the current AOL database, an updated version will be released annually.

If only annually, doesn't that mean that a newly-discovered allergen could be added to foods for almost a full year?

This is highly unlikely given it takes 10-12 years to develop and commercialize a new genetically engineered plant, and throughout this timeframe, Monsanto's product portfolio is reassessed shortly after each new version of the allergen database is available. Furthermore, while the total number of entries has increased over time, the type of proteins has not changed substantially. The seed industry, including Monsanto, have committed to not using known or even possible allergens in genetically engineered crops.

Questions on shift to ILSI/HESI

Why are you discontinuing your collaboration with the University of Nebraska-Lincoln?

Automated biological data analysis resources became available in the recent past that UNL declined in 2015 to use for subsequent annual updating of the AOL database. We believe ILSI/HESI is best equipped with the automated data analysis tools necessary to manage the database moving forward.

Alternative response: Due to the exponential growth in data, future allergen databases require automated tools for. We believe HESI's approach is consistent with the increasingly complex scope of the task moving forward.

What does this change mean for food safety evaluations?

The transition between allergen databases will occur seamlessly to assure there are no disruptions in any food safety evaluation. Going forward, we believe the new database will continue to provide state-of-the-art data analytics capabilities to ensure product safety.

Is the entire industry transitioning between databases, or just Monsanto? Who led this effort?

Yes, all eight seed companies are supporting the development of the HESI allergen database, and the decision was reached through consensus, since individual companies have had a long history of sharing resources to develop and maintain a robust allergen database.

For additional information if pushed:

Each company also has the ability to opt in or out of the collaboration or contract negotiation to meet their specific scientific needs. I would refer you to HESI for information on their sponsors. We recognize the advantages of being able to better leverage advances in the field of bioinformatics and the ever-increasing quantity of sequenced data published by the scientific community.

Although you will no longer be financially supporting it, will you continue to add any new allergens you discover to the Allergen Online database?

Addition of "new allergens" to the AOL database is not provided by Monsanto (or any other financial sponsor). Additions to any database come from academic publications and sequences deposited into the NCBI repository, called GenBank. The HESI database, like AOL, will be based on these scientific publications and NCBI for the source of protein sequences to be included.

And when developing a new genetically engineered plant, will you consult both the new HESI allergen database as well as the existing Allergen Online database? If not, why not?

Monsanto will use the HESI database as of 2017.

Won't the existence of two competing allergen databases increase the risk to the public of allergic reactions from GMO foods? Wouldn't a single database be more reliably comprehensive, and thus effective?

Several allergen databases have pre-existed the development of the new HESI database to be launched in 2017. The AOL database is based on the comprehensive NCBI repository of protein sequences and was designed to meet criteria defined by Codex Alimentarius for the safety assessment of foods derived from modern biotechnology. Codex is a WHO/FAO international commission that is the reference for global regulatory authorities. The HESI allergen database will continue the commitment to pull from the most comprehensive list of protein sequences, NCBI, and conform to Codex guidance for GMO allergy assessments.

There are reports that you had concerns with the existing database at University of Nebraska-Lincoln.

It is critically important that any allergen database is completely accurate and offers the greatest possible quality and reliability, as it is core to safety assessments conducted by the companies and the

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regulatory authorities who rely on it. We have had, and continue to have confidence in the University of Nebraska-Lincoln and Allergen Online. The HESI allergen database will leverage advancements in the field of biological data processing and analysis to keep pace with the ever increasing output from modern genomic sequencing capabilities that deposit new protein sequences to the NCBI repository.

But, these emails show you had great concerns about the accuracy of the database that you were paying Dr. Goodman to keep.

The sponsors had questions and concerns about the usability of the AOL database. The identification of known and possible allergens listed in the database is published and peer-reviewed by academic experts to ensure accuracy. We believe that the new technology provided by HESI will allow us to keep pace with the exponential growth data by employing newly developed automated tools.

Additional information if needed:

The transitioning to the new HESI database is a reflection of the need to continue to develop cutting-edge technologies to keep pace with the increasing amount of scientific data, protein sequences included, that are part of ongoing technological and scientific advances around the world. (Check with Allergen Team before using): **It will also allow us in the future to have a single point on the ILSI website for the allergen database and other ILSI resources important to food safety assessments (e.g., the crop composition database.**

If Allergen Online will be inferior to the new ISLI database, doesn't this create unnecessary risk to the public from allergens in GMO foods, given the fact that some of your competitors plan to continue using Allergen Online?

We continue to stand by the accuracy and reliability of the AOL database. We believe that the sheer volume of research for review warrants the move to HESI. With respect to GMO foods specifically, it's important to note that there has never been a documented case of an allergic reaction to a food because of genetic engineering.

Did you pay UNL in full for all of the work they have done? Or are you withholding payment on invoices?

Allergen Online was fully funded by Monsanto and other sponsors to enable the 2016 version to be made available by UNL.

Questions regarding Dr. Goodman

What was Goodman's job at Monsanto?

Dr. Goodman was a protein biochemist who ensured that allergens were not introduced into GM plants being developed at Monsanto.

Did Dr. Goodman establish this program at the University of Nebraska while he was still an employee of Monsanto? Is this a conflict of interest?

No, the database existed prior to Dr. Goodman's move to UNL.

What were the circumstances of his departure from Monsanto?

For privacy reasons, we can't comment on personnel matters.

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What was Dr. Goodman's role with GMO Answers?

We refer you to GMO Answers for information

What is your response to the claim that Dr. Goodman says he was distracted from allergen database work by biotech advocacy?

Our support for the Food Allergy Research and Resource Program at the University of Nebraska [and for Dr. Goodman] was limited to the allergen database, web site and publications. Any advocacy carried out by the program or its staff were not requested, or funded, by Monsanto.

Did you ask Elsevier to use Dr. Goodman to review the paper by Dr. Seralini or otherwise use him in a peer-review capacity?

No. The request came from Elsevier and we were not involved in any way.

Did you ask Elsevier or Dr. Goodman to retract Dr. Seralini's paper?

No. The decision to retract Dr. Seralini's paper came from Elsevier and we were not involved in any way.

Was Goodman fired or demoted at Elsevier as part of their efforts to walk back their retraction of the Seralini paper?

We would refer you to Elsevier for questions about their staffing or editorial process.

Miscellaneous Questions

Did you or CBI pay any of the third party experts who contributed articles to GMO Answers? Including paying them for work that was nominally separate from their GMO Answers work?

No, neither Monsanto nor CBI has paid any of the third party experts to contribute to GMO Answers. Experts donate their time to answer questions in their area of expertise for the site. On occasion, independent experts participate in speaking or media opportunities on behalf of GMO Answers. In these instances, GMO Answers will reimburse for the travel expenses incurred by the expert.

If you were paying a third party expert like Goodman for separate research work, doesn't it make it more likely he would agree to write positive pieces for GMO Answers? Why should the public trust an academic's statements about GMOs if they receive money from industry?

If you have questions about why a particular scientist or academic advocates for biotechnology, we would refer you to that person. But generally speaking, the vast majority of U.S. scientists believe it's safe to eat GMO foods – so it shouldn't be surprising when a scientist speaks out publicly to share that view.

Proactive Plan and Resources

Updated May 1, 2015

- a. General Proactive Strategy
 - i. General Proactive Communications Materials
 - ii. Key Q&A
 - iii. Relevant Links
- b. Proactive Public Private Partnership Materials

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- i. Infographics and blogs/op-eds both by MON and industry partners
- c. Proactive Allergenicity Materials
 - ii. Infographic and blog/op-eds – organized by MON distributed by GMOA
 - iii. HESI proactive approach and materials
- d. Proactive Training
 - iv. Training for independent experts via GMOA
 - v. Internal MON training, and partnership training on Smart Communications
- e. **Transparency Audit and Direction**

Proactive Strategy

Monsanto should engage proactively to drive one consistent and unified message about the legitimate, appropriate and positive collaboration among our company, the industry and these academics. We should get ahead of the activist rhetoric by proactively telling our story on our own terms. Our strategy should give us a central point for sharing information and resources and offer the flexibility to adapt and amplify as needed. To the extent possible and helpful, our strategy should align with the industry's approach.

Our strategy should include four major components: 1) an aggressive digital approach that is both proactive and reactive; 2) strong, proactive stakeholder engagement, including engagement with our academic partners and the industry; and 3) employee communications; and 4) a proactive media approach that uses the digital hub to frame the story with key reporters.

- 1) We should use our own digital channels to share and shape our positive story proactively – beginning in advance of any document disclosure by USRTK. Using our digital channels, we could construct a digital “hub” to define our own narrative in advance of the activists’ release of information, provide key messages and Q&As, share links to third-party resources, etc. We should proactively share this hub with key stakeholders (including the targeted academics) and media outlets and continue to use our channels to respond reactively to specific claims and attacks and to amplify key messages from industry groups, such as CBI or BIO.

Examples: <http://www.monsanto.com/food-inc/pages/default.aspx>
<http://www.monsanto.com/gmwheat/pages/default.aspx>

- 2) We should share our proactive messaging through the digital hub with our key academic and industry partners. We want our allies to see Monsanto taking a strong stance in support of our partners and academic freedom. We also want our partners to be able to share the link to our key messages and resources through their digital and social channels.
- 3) We should prepare employees through an issue alert and Ambassador update.
- 4) We should take a bold media approach to tell our side of the story. As noted above, we should proactively share the digital hub with key reporters and stakeholders and work with any reporters who would like to write on the topic. Ideally, we will do this in advance of any document release by USRTK in an attempt to proactively influence the tone of the coverage.

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Reactively, we should be prepared with a responsive statement and Q&As (see below) to respond to any inquiries. If needed, we should consider reviewing, redacting and uploading documents to the digital hub if we need to put isolated quotes or comments in a broader context. We will outline a more detailed media approach below.

Proactive Communication Materials

This material has been posted on Monsanto.com prior to USRTK disclosure & shared with stakeholders, media and others. Can be adapted for talking points as well.

Collaboration is Key to Nourishing a Growing World: Our Response to U.S. Right to Know

At Monsanto, we're working with others to address some of the world's biggest challenges – from combating climate change, to preserving water and other resources, to making a more balanced meal accessible for everyone. No one person or organization has all the solutions to these massive issues. But we can all do our part.

Among many other partners, we're proud to collaborate with leading non-governmental organizations like the Gates Foundation and Conservation International; family farmers here in the U.S. and small-holder growers in Africa and India; and world-class researchers at major universities, such as the University of California-Davis, the University of Florida, the University of Illinois and the University of Nebraska-Lincoln.

Recently, a special-interest group called U.S. Right to Know has used state open-records laws to request copies of communications between certain academic researchers at UC-Davis, Florida, Illinois and Nebraska-Lincoln and employees of Monsanto, other agriculture companies, and various firms and trade associations. While we respect open-records laws as a vital safeguard in a democratic society, we are concerned that special interests can also exploit these laws as a means to silence scholars and researchers who speak out on important topics – in this case, agricultural biotechnology.

The universities in question will review the requests from USRTK and will make decisions about what documents, if any, they will release in accordance with state laws, including laws that protect the release of businesses' confidential information. We expect the universities to fully respect all protections afforded to our intellectual property by applicable laws, contracts and other provisions.

Based on published comments, the individuals behind U.S. Right to Know seem to believe that public-private collaboration to nourish our population and protect our planet is a bad thing. We see collaboration very differently. These researchers are some of the best and brightest minds in agriculture and plant science. Their ideas are vital to the future health of people and our planet. We fully stand by our professional relationship and collaboration with each of them, and we see these records requests as little more than academic bullying.

Here are some examples of the conversations USRTK – and anyone else – will see as they review these emails:

■ **Evaluating the safety and performance of new products through regulated field trials**

We routinely work with researchers at public universities to conduct [field trials](#) as part of the U.S. regulatory process. The trials are vital to develop important scientific information, to assess the performance of a new trait, and to generate the necessary environmental safety data required by regulatory authorities that evaluate commercial product approvals. Researchers conduct the trials in accordance with strict procedures and stringent auditing, reporting and compliance requirements. We sign contracts with the researchers who conduct these trials, and we pay fees to them and the universities for performing this highly technical research.

■ **Collaborating in academic and industry organizations and conferences**

Many of our scientists belong to the same academic and industry associations as these university researchers. It is not uncommon for Monsanto scientists and university scientists to serve in leadership positions in these associations and to plan conferences, meetings and other events together. These interactions promote the exchange of information and ideas that advance scientific knowledge for all. Sometimes, if we invite or request an academic to speak at a particular meeting, we will cover the speaker's travel expenses or provide an honorarium.

■ **Sharing agronomic data and recommendations**

Our scientists and agronomists will turn to academic experts for agronomic advice and guidance to share with customers and others in the field, and university researchers approach our experts as well. These types of conversations ensure that information flows from the lab to the field and back.

■ **Serving as graduate degree advisors and academic mentors**

Many of Monsanto scientists are graduates of the world's most respected graduate programs in agriculture, plant science and related fields, including the graduate programs at the University of California-Davis, the University of Florida, the University of Illinois and the University of Nebraska-Lincoln. In some cases, the university researchers subject to these requests were academic advisers or dissertation committee chairs for Monsanto scientists, and these individuals continue to maintain a professional relationship.

■ **Co-authoring peer-reviewed research in academic journals**

Our scientists are recognized experts in their professional fields as well, and many of our scientists routinely publish peer-reviewed papers in academic journals. Our scientists will collaborate and co-author papers with university researchers on topics of mutual interest. In addition, Monsanto scientists frequently serve as peer-reviewers or site on the editorial boards of such publications.

■ **Recruiting the best and brightest to work in agriculture**

These university professors work with some of the best and brightest young minds in agriculture – the next generation of leaders who will move our industry forward. When we are hiring for research positions, we sometimes turn to these professors to help us identify top talent. We also work with university researchers to administer our [Beachell-Borlaug International Scholars Program](#), which encourages aspiring graduate students to pursue doctoral degrees in rice and wheat breeding.

■ **Providing factual information and resources on agriculture, biotechnology and other matters to the general public, including through the GMO Answers website**

We understand that consumers have questions about agriculture, and especially about GMOs. As part of the Council for Biotechnology Information, Monsanto is one of the founding members of the [GMO Answers](#) website. Through this website, experts from companies like Monsanto, industry leaders, farmers, and independent university researchers are answering a wide range of questions about GMOs and other agricultural practices. GMO Answers is transparent about its mission, purpose and funding on its [website](#).

■ **Advocating for sound public policy on issues relating to agriculture**

Monsanto, like our opponents, advocates our position before governments. Specifically, we advocate for supportive policies, regulation and laws that are based on the principles of sound science. Academic experts who share our science-based views sometimes advocate in support of the same policies. We occasionally share our opinions in similar public forums, and Monsanto employees and academic researchers sometimes share the stage at events. In every case, we thoroughly follow local laws and conduct routine audits to ensure our efforts are transparent, appropriate and legal.

As Monsanto employees, our collaborations in each of these areas are strictly governed by our [Code of Business Conduct](#) and other corporate policies. The Code addresses the many legal and ethical facets of integrity in business dealings with customers, suppliers, investors, the public, governments that regulate us, and communities where we do business. In addition, the Code outlines several means for employees to raise questions or concerns about integrity and for the company to address these issues appropriately.

Agenda-driven groups often take individual documents or quotes out of context in an attempt to distort the facts, advance their agenda, and stop legitimate research. As company built on sound science, we hold ourselves to a higher standard. We will use this website to provide updated statements and materials regarding the claims by U.S. Right to Know. We have also included links to third-party resources to help readers understand the issues involved in this situation. We invite everyone to review the facts and consider both sides of the story.

Key Q&A

(Display on hub.)

1) Who are these researchers?

We are aware of requests to academics at four universities: Julian Alston, Kent Bradford, Colin Carter, Caitlin Cooper, Denneal Jamison-McClung, Martina Newell-McGloughlin, Pamela Ronald, Daniel Sumner, Neal Van Alfen and Alison Van Eenennaam at the University of California-Davis; Alina Campbell Fernandez, Kevin Folta, Dennis Gray, Curtis Hannah, David Oppenheimer, Anna-Lisa Paul, Joy Rumble and Daniel Schmehl at the University of Florida; Bruce Chassy and Stephen Moose and the University of Illinois; and Richard Goodman at the University of Nebraska-Lincoln.

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2) Why were they targeted?

These are some of the leading researchers in the fields of agriculture, plant science and agricultural biotechnology. They have spoken publicly about their research and views on biotechnology and other topics in agriculture.

3) What is U.S. Right to Know?

An advocacy group formed to oppose innovation and new technologies in agriculture. The group's only disclosed funder is the Organic Consumers Association.

4) What is Monsanto's policy on making contributions or payments to academic researchers?

All Monsanto employee activities are strictly governed by our [Code of Business Conduct](#) and other corporate policies. *[add more if available]*

5) Does Monsanto exert undue influence on public policy?

No. Monsanto, like our opponents, advocates our position before governments. Specifically, we advocate for supportive policies, regulation and laws that are based on the principles of sound science. In addition, we thoroughly follow local laws and conduct routine audits to ensure our efforts are transparent, appropriate and legal. You can read more about our policies concerning government affairs and other activities [here](#).

6) Does Monsanto pay university researchers to speak on the company's behalf?

All Monsanto employee activities are strictly governed by our [Code of Business Conduct](#) and other corporate policies. *[add more if available]*

7) What is Monsanto's role in [GMO Answers](#)?

As part of the Council for Biotechnology Information, Monsanto is one of the founding members and funders of [GMO Answers](#). [GMO Answers](#) is fully transparent about this relationship on its [website](#).

8) *[Do not post – only use if needed]* Some of the comments from Monsanto employees' emails were unprofessional and inappropriate. What are you going to do about that?

As Monsanto employees, we all have the responsibility to act with professionalism, integrity and respect. Each of us is bound to abide by our [Code of Business Conduct](#) and other corporate policies. When we see learn of behavior that doesn't live up to this standard, we take it seriously. We'll be taking a careful look at this situation.

Relevant Links

GMO Answers:

<https://gmoanswers.com/>

GMO Answers: "What is the GMO industry trying to hide?":

<https://gmoanswers.com/studies/what-gmo-industry-trying-hide>

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Columbia Journalism Review: “Why scientists often hate records requests”:
http://www.cjr.org/the_observatory/why_scientists_often_hate_reco.php

UCLA Statement on the Principles of Scholarly Research and Public Records Requests:
<https://www.apo.ucla.edu/resources/academic-freedom>

Monsanto Code of Business Conduct:
<http://www.monsanto.com/howweare/pages/business-conduct.aspx>

Monsanto policies on governmental interactions and influence:
<http://www.monsanto.com/newsviews/pages/revolving-door.aspx>

Proactive Public Private Partnership Materials

As one of the main targets of issue used by USRTK is collaboration with public institutions it is important to emphasize the value of PPP. This will be a main thread in MON communications over the next year, below are some resources that have been developed up until this point. (updated 1.7.16)

PPP Infographics

GMOA is working with UIDP to develop a PPP infographic. To be completed June 2015

PPP op-eds & blogs

Content Type	Channel	Author / Spokesperson	Description	Status	Notes
Blog article	Beyond the Rows blog	Eric Sachs, Strategic Engagement Lead	Q&A about basics of PPP Title: “Why does Monsanto work with Academics?”	Published 10/2/15	Link to article: http://monsantoblog.com/2015/10/02/why-does-monsanto-work-with-academics/
Webpage	Monsanto.com	N/A	Overview and statement about USRTK and FOIA	Published 10/2/15	Link to webpage: http://www.monsanto.com/newsviews/pages/response-to-right-to-know.aspx
Blog article	GMO Answers Forbes blog	Tom Eickhoff, Agronomic Services Lead	Personal account of benefits of PPP Title: “How Companies (Like Monsanto) Fill The Research Gaps”	Published 10/29/15	Link to article: http://www.forbes.com/sites/gmoanswers/2015/10/29/how-companies-like-monsanto-fill-research-gaps/
Infographic	Monsanto.com	N/A	Overview of how we collaborate with universities	Published 10/29/15	Link to webpage: http://www.monsanto.com/improvingagriculture/pages/collaborating-with-academics-and-universities.aspx

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Op-ed	Boston Globe	Robb Fraley	<p>PPP yields innovation; needed in ag (Leath quote); irresponsible use of FOIA stifles</p> <p>Title: "In Defense of Collaboration: Public private partnerships are a U.S. economic cornerstone and essential for our future"</p>	To be submitted June 2016 depending on media hook	<p>Talk to digital team about amplifying (MON channels, ambassadors, social squad)</p> <p>Potential tag along piece from Henry Miller, others?</p>
Blog article	GMO Answers Forbes blog	Tony Boccanfuso, UIDP President	<p>Importance of PPP to agricultural innovation</p> <p>Title: "Why University-Industry Collaborations Matter"</p>	Final feedback due 1/8/16	<p>Tal: 202- [REDACTED] Tony: 803- [REDACTED] Michele: 609- [REDACTED]</p>
Video	Monsanto, KSU and UIDP online channels	TBD	<p>Feature Monsanto's wheat-related partnership with KSU</p>	completed	<p>This video is part of UIDP's "Partnerships in Action" series. Here is another example featuring Seimens and UNC Charlotte: https://www.youtube.com/watch?v=17gOOjUIQpU</p> <p>KSU/MON partnership started in 2009; both parties share access to KSU's locally adapted germplasm and Monsanto's breeding tools; result in better wheat varieties for Kansas wheat growers.</p> <p>Keep Maureen M. looped in on script</p>
Op-ed	TBD	ISU	<p>Importance of PPP, especially in agriculture</p>		

Future Content Ideas:

- March 2016 – highlight STEM Connector Food & Ag Council meeting; feature Sherri Brown
- May 2016 – Tom Eickhoff video; tie to "Farm Basics" GEC theme; highlight RR Plus to compliment GIAM: Superweeds video release
- June 2016 - ISU/Monsanto joint oped during Pollinator Week; highlight Iowa Monarch Conservation Consortium
- July 2016 – Jeff Seale feature about career choice; tie to "Balanced Plate" GEC theme (Sherri Brown)
- Aug 2016 – blog with links to all stories developed to date; importance of university-industry collaboration; tie to "Collaboration" GEC theme

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- Other Sherri Brown topics:
 - Good relationship, involvement with Tuskegee College
 - Mizzou “Preparing Tomorrows Leaders for Science (PTLS)” program; Sherri involved and MON sponsors
 - 8 Wash U fellows; MON sponsors and participates; recent presentations
- ISU / USDA / Bt corn and Mycotoxins (Eric S.)
- Amplify story out of Africa about what could happen without PPP (Alistar H.)
- Better amplify when we donate to universities (equipment, germplasm, etc.)

GEC Themes:

- Jan, Feb – Climate Smart Ag
- Mar, Apr – Environmental Sustainability
- May – Farm Basics
- Jun, July – Balanced Plate
- Aug – Collaboration

Other Relevant Existing Content:

- [Monsanto gift helps create state-of-the-art soils lab](#) (September 2015)

Points:

- Shared values (career choice)
- Pew opinion research on GMOs (scientists/public gap)
- Federal role in agriculture research stagnating

Proactive Allergenicity Infographic and blogs

There is a need to better explain the testing for allergens in GMO crops. The below content was created in partnership between MON SME and GMOA. It is to be distributed by GMOA.

(For infographic and mythbusters please see addendum.)

GMO Answers Content Creation - infographic would provide a visual that addresses questions or concerns around GMOs and allergenicity.

- a. ***How are GMOs Tested for Allergenicity? (GMO Answers’ infographic)*** – Overview of allergenicity testing process for GMOS (see attached initial overview) to show robust process GMOs undergo to ensure they do not cause new allergens (many consumers are unaware of this process) Please note this is just the copy draft; the infographic will include imagery to help bring the content to life, once the text is approved.

2) Third Party Content Creation (Forbes post)

- a. [Jennifer Schmidt](#) Q&A style post about GMOA allergenicity; farmer and RD (Notes: has [answered questions](#) thoughtfully on this topic in the past)
- b. Backup: Connie Diekman - M.Ed, RD, LD, FADA is a Nutrition Communications Consultant and Director of University Nutrition at Washington University in St. Louis

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3) Content Amplification via paid, earned shared and owned

- a. **Paid:** Leverage paid search intercepts to drive additional visibility for allergy content on *GMO Answers* and *Forbes* (including attached mythbuster)
- b. **Earned:** Pitch new assets to media to continue building relationships with key reporters and educate those who cover biotech issues but might not have a lot of experience/background on how GMOs are tested for allergenicity (Targets: Handful of agriculture reporters and trades, as well as targeted list of health reporters)
- c. **Shared:** Share mythbuster and infographic via *GMO Answers* social profiles (including twitter, Pinterest) – once live
- d. **Owned:** Post content to owned *GMO Answers'* channels (*Studies and Articles* and *Educational Resources* page)

HESI proactive approach and materials

As a proactive measure, HESI should disclose the partnership to begin Jan 2017 prior to UNL email release. Monsanto worked with HESI to create [press release](#) on COMPARE database and proactively tweeted about it in Feb 2016. Robb Fraley retweeted with comment.

Proactive Training for independent experts via GMOA

As part of our efforts to empower independent experts as they come under attack by activists, FOIA requests etc *GMO Answers'* will be developing a set of Webinars for the Expert Community. We have heard from many experts that there is interest in additional learning opportunities and more ways to interact with each other. The series seeks to address both by hosting workshops to discuss relevant topics (outlined below) while providing an open forum for the expert community to openly engage with each other regarding industry news, current/upcoming projects and research, or other relevant subjects, etc. These are closed discussions for invitees only.

The Webinar Workshops kicked off April 29, 2016 with “**Earned Media: How it Works**” and provided a deep dive into understanding earned media and journalism in 2016.

Other topics to be covered later this year will include:

- “Telling Your Biotech Story,” a webinar workshop on how to lead a compelling conversation about the work you do.
- “Social Media 101: The Platforms & Conversations,” a webinar workshop on social media trends in 2016 and how to be a part of it
- “Capitol Hill Happenings,” a legislative update on all the latest Hill news

Additional suggestions for topics and new experts can be given to Chelsey Robinson to share with the GMOA steering committee.

Internal MON training and partnership training on Smart Communications

Kris Ramaraju has developed a training deck for Smart Communications. This presentation has been given to the Stakeholder outreach team, Issues Management team, and Regulatory SAP team, with additional planned training for the Media team, LEAD network via Milton Stokes, and others as needed.

Transparency Strategy

To better understand what consumers find to be valuable transparency from the industry we are working to understand where Monsanto stands compared to other companies in the area of transparency and disclosure related to our public-private partnerships and academic collaborations.

Below are areas that we are interested in increasing awareness around or disclosing. Our goal is to audit our performance and use that information to better disclose to the public our collaborations. **At this time (May 15, 2016) three agencies have provided us with quotes. We will choose one agency and proceed by May 30, 2016.**

To see current audit proposals - [\\finch\tech_comm\CKROBI\Public\transparency\Audit Quotes](#)

Areas of Collaboration - Based on our 2015 sustainability materiality, we have identified five issue topics directly related to disclosure and transparency including:

1. R&D Research or knowledge collaborations with Universities, Public Research Institutes, other Non-Profit organizations (including research funding, grants, and unrestricted gifts)
2. Business Ethics and Strategy – including lobbying strategy & political giving (direct and indirect), PR/communications strategy and goals, memberships in industry organizations like the Coalition for Safe and Affordable Food, CropLife International, CropLife America, Biotechnology Innovation Organization.
3. Counsel, Guidance and Outreach support - partnerships with academics, dietitians and others for their guidance, outreach support, and / or interaction at conferences.
4. Investments in for-profit research and development organizations, venture capital etc.
5. Product stewardship and safety

We are seeking to understand the following questions through benchmarking or other ways you might advise, and are not sure how to go about the process. Our questions include:

- How do similar companies (agriculture companies, food companies, technology/innovation companies and others you might suggest) disclose their activities in the areas of collaborations above?
- How does Monsanto currently compare to other companies in disclosure around activities in the areas above?
- Is there market research that exists that helps to define what consumers and the general public feel is “good disclosure” or “transparent partnerships”?
- What type of guidance or principles might Monsanto put in place to help us understand what to disclose and how to go about it so that we can be more transparent?

USRTK Background

U.S. Right to Know is registered as a 501(c)(3) organization registered in the State of California. The organization claims to be “working to expose what the food industry doesn’t want us to know.” Gary Ruskin, who was the campaign manager for the pro-Prop 37 campaign in California, is the organization’s executive director and co-founder. The organization first emerged online in mid-January 2015. Ruskin began posting items to the organization’s website on Jan. 12, 2015. Since then, he’s posted a number of items relating to GMO labeling, transparency and other issues. Politico reported a brief item on the group’s launch on Jan. 20.

Because the organization is so new, they have not yet filed a complete Form 990. They have registered with the California Secretary of State. On the U.S. Right to Know website, Ruskin claims the organization will disclose any “major contributor,” defined as a contributor who donates \$5,000 or more. As of March 10, the only contribution listed was in the amount of \$64,500 from the Organic Consumers Association.

In addition to his work with the Prop 37 campaign, Ruskin previously served as the executive director of a group called Commercial Alert, and he was director of the Center for Corporate Policy, which publishes reports attacking business and industrial interests. He has an undergraduate degree in religion from Carleton College and a master’s degree in public policy from the Kennedy School of Government at Harvard.

Ruskin has a modest and mainstream social media profile. He has 803 followers on Twitter and has posted somewhat frequently since January on topics relating to glyphosate toxicity and GMO labeling as well as the ongoing FOIA matter. Also since launching U.S. Right to Know, he has been quoted in articles by Reuters, Wired News, Science Magazine, Politico and other outlets.

In the online publication “Spooky Business: Corporate Espionage Against Nonprofit Organizations” (dated Nov. 20, 2013), Ruskin claimed there is a formal relationship between Monsanto, Blackwater and Total Intelligence Solutions. In the publication, he claims, “Many of the world’s largest corporations and their trade associations – including the U.S. Chamber of Commerce, Walmart, Monsanto, Bank of America, Down Chemical, Kraft, Coca-Cola, Chevron, Burger King, McDonald’s, Shell, BP, BAE, Sasol, Brown & Williamson and E.ON – have been linked to espionage or planned espionage against nonprofit organizations, activists and whistleblowers” (p. 3). Ruskin later claims, “According to internal Total Intelligence communications, biotech giant Monsanto – the world’s largest supplier of genetically modified seeds – hired the firm in 2008-09. The relationship between the two companies appears to have been solidified in January 2008 when total Intelligence chair Cofer Black traveled to Zurich to meet with Kevin Wilson, Monsanto’s security manager for global issues” (p. 34).

In addition to Ruskin, the only publicly listed employee of U.S. Right to Know is Stacy Malkan, who is listed as co-founder and media director. She has published a book, “Not Just a Pretty Face: The Ugly Side of the Beauty Industry” (2007), and was co-founder of the Campaign for Safe Cosmetics. She worked with Ruskin as media director of the Prop 37 campaign and previously was a journalist.

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The organization has a small board of directors: Juliet Schor, board chair, Professor of Sociology at Boston College; Charlie Gray, researcher, Greenpeace USA, and former director, Center for Corporate Policy; and Lisa Graves, executive director, Center for Media and Democracy, and former U.S. Deputy Assistant Attorney General, Office of Legal Policy, and former legislative strategist at the ACLU.

Carey Gillam background / approach

As Carey Gillam has moved to USRTK and left Reuters she is no longer a journalist and Monsanto will not respond to her as such. For details on approach please contact Sara Miller. Our current response to Carey Gillam and her allegations is available here:

<https://medium.com/@MonsantoCo/behind-the-scenes-how-monsanto-works-with-the-media-a80ec9aa2481?sf26081174=1#.y5bvm0hgs>

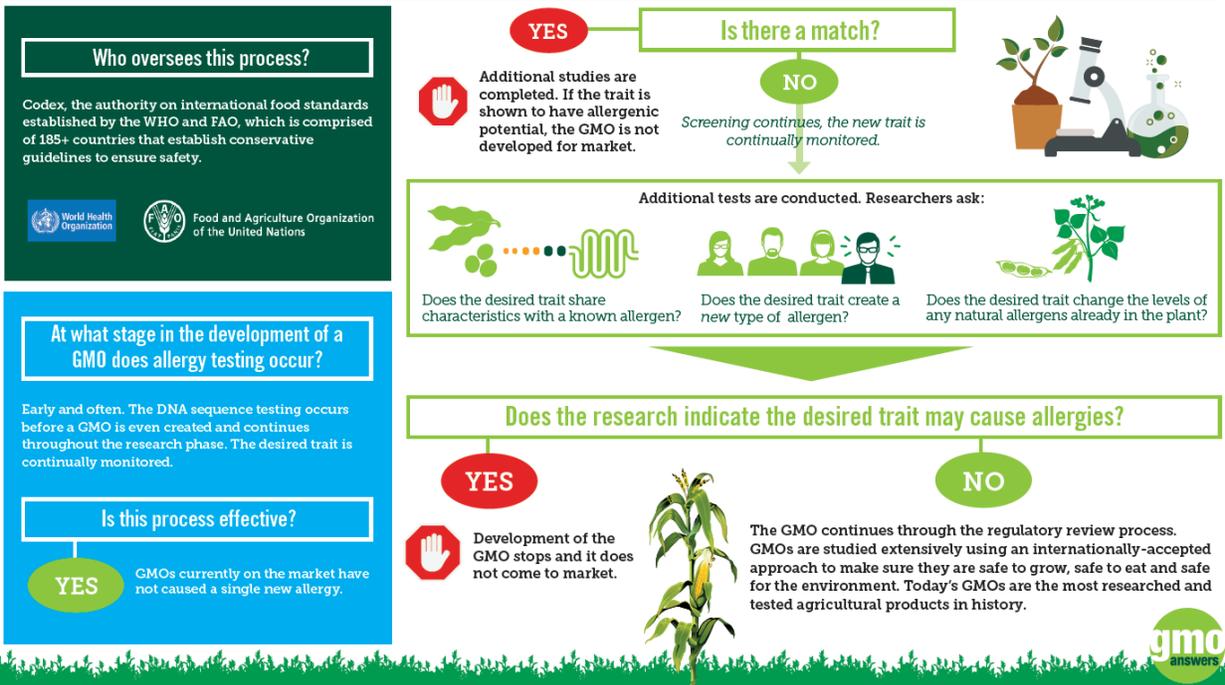
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Addendum

HOW ARE GMOS TESTED FOR ALLERGIES?

Before a GMO is created, the desired trait is screened against all known human allergens to confirm it does not introduce a new allergen.

How does this work? Researchers look at 1,950+ genes to see if there is a match between the desired trait and a known allergen.



Number of search results for "GMO Allergies" in under one second:
1,030,000

Number of allergies caused by GMOs in 20+ years:
0

Start your search for GMO Facts at GMOAnswers.com

gmo answers