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IOWA DEPARTMENT OF JUSTICE  
OFFICE OF THE ATTORNEY GENERAL

JJ Fleeman  
Chief Executive Officer  
Ahold Delhaize, USA  
2110 Executive Dr.  
Salisbury, NC 28147-9007

Dear Mr. Fleeman:

As the Attorneys General of Iowa, Kansas, Nebraska, and Tennessee, we enforce our consumer protection statutes that protect our citizens. Our consumer protection laws are powerful tools to ensure that companies respect the rights of the people—and their responsibilities to the citizens of our States.

A topic of growing concern in our States is the imposition of various economic, social, and governance commitments made by corporate managements and whether those commitments are misleading to consumers and other relevant parties. There is great concern that many commitments violate State law. And those worries echo across the country.

Diverse Attorneys General have filed consumer protection actions in this space. In those cases, irresponsible statements made by the companies to conform to certain sentiments in the environmental space led companies to scrutiny and major State-led investigations. Our letter intends to encourage your companies to abandon ESG policies that create undue litigation risk. Those policies embrace impossible-to-achieve goals that create potential for consumer fraud violations.

We recently became aware of a letter published by Consumers Research, a consumer advocacy organization, that highlights climate commitments and other statements made by your company and its management and comparing them to statements and commitments made by other companies that served as the foundation for the consumer protection lawsuits by the attorneys general.

The comparisons made by the Consumers Research letter are stark, and they raise real concerns.

We are analyzing the appropriate steps to take considering these newly public revelations.

To that end, and to aid us in our analysis, please (1) confirm whether the statements that Consumers Research cites in its letter reflect your current commitments and positions, and (2) point us to any net-zero commitment or pledge that is prospectively in effect or otherwise in place at your company.

Knowing your company's positions and statements going forward is crucial to our current analysis of how to respond to the ongoing concerns raised by this Consumers Research letter.

To that end, please provide a response by October 11, 2024 with a clear indication of what your forward looking commitments are as of the date of your response.

Sincerely,



Brenna Bird  
Attorney General of Iowa



Kris Kobach  
Attorney General of Kansas



Mike Hilgers  
Attorney General of Nebraska



Jonathan Skrmetti  
Attorney General of Tennessee