

2017

Who's Minding the Store?

A report card on retailer actions to eliminate toxic chemicals



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Who's Minding the Store?

A report card on retailer actions to eliminate toxic chemicals

Executive Summary

Retailers remain on the frontlines of consumer discontent with the chemical safety of the products they buy and sell. In its second annual report card on safer chemicals in consumer products, the Mind the Store Campaign found that one-third of 30 major U.S. retailers are leaders, but two-thirds remain serious laggards. More work is needed to ensure that the products that retailers buy and sell are free from dangerous chemicals of high concern to human health and the environment, throughout their supply chain.



For the second year in a row, retailers earned an average grade of D+ for the chemical safety of products sold at retail. However, those eleven retailers who were evaluated in both years raised their average grade from a D+ to a C. Seven out of those eleven retailers made significant improvements in their safer chemicals policies or programs. This good progress suggests that the Mind the Store Campaign has had a positive impact on product safety through its ongoing engagement with major retailers and consumers.

Rank	Grade	Leading Retailers
#1	A	Apple
#2	A-	Wal-mart Stores
#3 (tie)	B+	CVS Health
#3 (tie)	B+	Ikea
#5	B+	Whole Foods Market*
#6	B+	Target
#7	B	Best Buy
#8	C+	The Home Depot
#9	C-	Costco
#10	C-	Albertsons Companies

** recently acquired by Amazon, which was scored separately*

However, 70% of the retailers evaluated remain serious laggards, earning D's and F's, for failing to adequately put basic safer chemical policies to work to ensure the chemical safety of their products and supply chain. The nine major retailers that received F grades, including eight who scored 0 out of 135 possible points, are listed below:

Rank	Grade	Lagging Retailers
#22	F	Toys “R” Us / Babies “R” Us
#23 (tie)	F	Ace Hardware
#23 (tie_	F	Ahold Delhaize
#23 (tie)	F	Dollar General
#23 (tie)	F	Kohl’s
#23 (tie)	F	Office Depot
#23 (tie)	F	Sally Beauty
#23 (tie)	F	TJX Compaines
#23 (tie)	F	Trader Joe’s

During the last three years, at least a dozen retailers have significantly reduced or eliminated some chemicals of high concern in the products they buy and sell, including chlorinated solvents, NMP, flame retardants, BPA, phthalates, PFAS, formaldehyde, parabens, and other hazardous substances. Fourteen retailers reported no progress in reducing chemicals of concern over the past three years. Many are not doing enough to ensure that suppliers avoid regrettable substitutes when they phase out chemicals of high concern in products sold at retail.

Each retailer’s grade was based on points awarded for making progress in steps against fourteen criteria aimed at ensuring the chemical safety of the products they sell. The points scored were based on publicly available information. Each retailer was provided a draft score and grade and invited to provide feedback and additional information. Considerable input was received from retailers in writing and in meetings. Final scores were adjusted, often upward, based on new information received or separately announced. The criteria, which were applied equally to each retailer, address chemicals policy, management oversight, supplier accountability, supplier disclosure of chemicals, reduction or elimination of chemicals of high concern, safer alternatives policy, transparency of policies and product ingredients for consumers, chemical footprint, and use of third-party safety standards, along with several extra credit measures.

Introduction

Scientists, doctors and nurses around the country are sounding the alarm that exposure to toxic chemicals commonly found in everyday household products is contributing to diseases and health problems such as cancer, infertility, learning and developmental disabilities, diabetes, and asthma.

Toxic chemicals can end up in our food, water, air, household dust, and most are not adequately regulated. Newborn children and fetuses in the womb are the most vulnerable groups and face the greatest risks as a result of chemical exposure.



The production, use, and disposal of toxic chemicals in everyday household products is costly not only to our health, but also to our nation's bottom line. Pediatricians and scientists have found that the health effects of exposure to even just a handful of endocrine disrupting chemicals such as flame retardants, phthalates and bisphenol A (BPA) may cost the United States [hundreds of billions of dollars](#) in health care expenses and lost wages a year.

We can prevent harm and protect public health by taking common-sense steps, by phasing out toxic chemicals in everyday products that build up and persist in our bodies.

Thankfully there is hope.

Retailers have an important role to play – they not only have the power but also a moral responsibility to eliminate and safely substitute toxic chemicals to “mind the store.” We trust our retailers to provide the best for our families, and believe it's only fair that they enact sensible policies to protect our health and environment. They should stop letting chemical corporations put public health at risk.

The United States has led the world in scientific innovation for a century. If we can develop chemicals to convert sunlight into electricity, then we can lead the world in developing safer, more effective chemicals to use in our cleaning products, electronic gadgets, clothing, buildings, and food packaging. Retailers can help by incentivizing their suppliers to switch to safer alternatives.

This is now more critical than ever as the Trump Administration's EPA is [weakening](#) the implementation of our nation's new chemical safety law, signed just last year.

In 2013 Safer Chemicals, Healthy Families [launched the Mind the Store campaign](#) to challenge the nation's biggest retailers to sell safer products that are free from toxic chemicals that threaten public health and the environment. We called on the top U.S. retailers to develop and implement robust safer chemicals policies and drive the [Hazardous 100+ toxic chemicals](#) out of commerce, thus transforming the marketplace.

Last year our report *Who's Minding the Store? — A Report Card on Retailer Actions to Eliminate Toxic Chemicals* set out to evaluate the progress that has been made and challenges that remain. It addressed the ongoing need for transformational change in the marketplace in order to build a safer and healthier economy for all, and focused on eleven of the nation's largest retailers.

To evaluate the progress made since last year, as well as the continued need for market transformation, we have updated and expanded our report card. This year we expanded the report card to add nineteen new retailers – thirty in total – including some retailers engaged by our partners at the [Campaign for Healthier Solutions](#) and [Getting Ready for Baby](#) campaigns. Additionally, we evaluated how the policies of the eleven retailers' policies that we assessed last year changed or improved since then.

Last year we developed a detailed set of criteria across thirteen major categories to evaluate the policies and programs of leading retailers, as well as their progress in advancing safer chemicals and green chemistry solutions. This year we strengthened and improved the criteria, which now include fourteen major categories, in part to better align it with the [Chemical Footprint Project](#) criteria. In this year's report card, thirty major retailers were graded on a scale of 0 to 135 points, and a corresponding letter grading scale (measured on a curve) was developed to match the points system. To evaluate retailers' policies, we collected and reviewed publicly available information about their safer chemicals programs, and shared our draft findings with them. This gave retailers an opportunity to review our conclusions, disclose additional information, and make new public commitments towards safer chemicals.

Who's Minding the Store? — A Report Card on Retailer Actions to Eliminate Toxic Chemicals is the second annual evaluation of the safer chemicals programs of the nation's largest retailers in the United States. It comes just in time for the holiday shopping season.

Our investigation found that over the past year while some retailers have continued to make significant progress, the majority of retailers we evaluated remain serious laggards. The nation's biggest retailers must continue to expand and accelerate their policies and programs, given the growing amount of scientific evidence demonstrating the urgent public health crisis posed by hazardous chemicals.

Retailer Rankings

In the second annual report card on toxic chemicals in consumer products, the Mind the Store Campaign found that one-third of 30 major U.S. retailers are leaders, but two-thirds are seriously lagging behind.

To review how each retailer graded in detail you can:

- See the chart on the following pages to compare how the 30 retailers scored across the 14 categories of criteria.
- See pages 13-42 for a description of how each retailer scored.

How retailers rank on tackling toxic chemicals

EXTRA CREDIT

	15 PTS. Policy	10 PTS. Oversight	10 PTS. Accountability	10 PTS. Disclosure	15 PTS. Action	10 PTS. Safer Alternatives	15 PTS. Transparency	7.5 PTS. Chemical Footprint	7.5 PTS. Third-party Standards	5 PTS. Joint Announcement	15 PTS. Continuous Improvement	5 PTS. Safer Products	5 PTS. Collaboration	5 PTS. Impact Investment	Final Score
 Ace Hardware	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 PTS. F
 Ahold Delhaize	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 PTS. F
 Albertsons	4	2.5	2.5	0	6	2	7.75	0	4.5	0	10	0	0	0	39.25 PTS. C-
 Amazon	0	3.75	2.5	0	3	0	3	0	3	0	5	5	5	0	30.25 PTS. D
 Apple	12	10	10	7.5	12	10	9	0	7.5	0	15	0	5	5	103 PTS. A
 Babies 'R' Us	0	0	0	0	0	0	0	0	0	0	0	5	0	0	5 PTS. F
 Best Buy	9	7.5	7.5	5	12	2	5	0	3	0	10	5	5	0	71 PTS. B
 Buy Buy Baby	6	2.5	2.5	5	0	1	6.5	0	1.5	0	10	0	0	0	35 PTS. D+
 Costco	6	2.5	7.5	0	0	4	5	0	3	0	10	0	5	0	43 PTS. C-
 CVS Health	6	10	5	6	15	6	9	1.5	0	5	10	5	5	0	83.5 PTS. B+

How retailers rank on tackling toxic chemicals

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	15 PTS. Policy	10 PTS. Oversight	10 PTS. Accountability	10 PTS. Disclosure	15 PTS. Action	10 PTS. Safer Alternatives	15 PTS. Transparency	7.5 PTS. Chemical Footprint	7.5 PTS. Third-party Standards	5 PTS. Joint Announcement	15 PTS. Continuous Improvement	5 PTS. Safer Products	5 PTS. Collaboration	5 PTS. Impact Investment	Final Score
 Dollar General	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 PTS. F
 Dollar Tree	6	1	0	6	0	0	9	0	0	0	5	0	0	0	27 PTS. D
 The Home Depot	6	2.5	2.5	0	12	2	8.5	0	3	5	10	5	5	0	61.5 PTS. C+
 Ikea	12	8	10	5	12	4	7.5	0	0	0	15	0	5	5	83.5 PTS. B+
 Kohl's	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 PTS. F
 Kroger	0	2.5	0	0	6	1	1.5	0	1.5	0	5	5	0	0	22.5 PTS. D-
 Lowe's	0	2.5	2.5	0	6	0	0	0	1.5	2.5	0	0	5	0	20 PTS. D-
 Macy's	0	0	0	0	6	0	0	0	0	0	0	5	5	0	16 PTS. D-
 Office Depot	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 PTS. F
 Rite Aid	4.5	2.5	2.5	2.5	12	1	1.5	0	0	0	5	5	0	0	36.5 PTS. D+

How retailers rank on tackling toxic chemicals

EXTRA CREDIT

	15 PTS. Policy	10 PTS. Oversight	10 PTS. Accountability	10 PTS. Disclosure	15 PTS. Action	10 PTS. Safer Alternatives	15 PTS. Transparency	7.5 PTS. Chemical Footprint	7.5 PTS. Third-party Standards	5 PTS. Joint Announcement	15 PTS. Continuous Improvement	5 PTS. Safer Products	5 PTS. Collaboration	5 PTS. Impact Investment	Final Score
SALLY BEAUTY Sally Beauty	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 PTS. F
 Sephora	6	3.75	5	0	3	0	0	0	0	0	5	0	5	0	27.75 PTS. D
STAPLES Staples	6	2.5	0	0	3	2	0	1.5	3	0	0	5	5	2.5	30.5 PTS. D
 Target	12	10	2.5	7	0	4	12.5	0	6	0	10	5	5	5	79 PTS. B+
TJX TJX Companies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 PTS. F
TRADER JOE'S Trader Joe's	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 PTS. F
 Ulta Beauty	3	5	0	0	3	1	1.5	0	0	0	5	0	0	0	18.5 PTS. D-
 Walgreens	0	7.5	0	5	0	0	4	0	0	0	0	0	5	0	21.5 PTS. D-
 Walmart	9	2.5	2.5	6	15	6	14	6	5.5	0	10	1	5	5	87.5 PTS. A-
 Whole Foods	9	5	6.25	6	12	6	12	0	6	0	15	5	0	0	82.25 PTS. B+



Ace Hardware

Letter grade = **F**

Total points = 0 out of 135

Ace Hardware is failing to publicly address toxic chemicals in the products it sells. With a letter grade of F, it was one of eight retailers in our review to score zero points, with no significant public-facing commitments to address the safety of chemicals used in the products it sells or in its private brands. As a retail cooperative, most Ace stores are independently owned and operated and have some flexibility in determining what they stock and market. However, the Ace Hardware company is responsible for selecting private label products and can greatly influence what is marketed at its member stores. While some local Ace stores have made progress in promoting safer products, leadership is clearly needed from the company to commit to addressing chemicals of high concern and identifying and promoting safer alternatives.

Opportunities for improvement: Ace Hardware can make progress by developing a public written safer chemicals policy, setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern, with a special emphasis on private label products the company is responsible for vetting. Ace Hardware should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.



Ahold Delhaize

Letter grade = **F**

Total points = 0 out of 135

Ahold Delhaize, the nation’s 11th largest retailer and parent company of many familiar supermarket chains (including Food Lion, Stop & Shop, Giant and Hannaford), has failed to publicly address toxic chemicals in the products it sells. With a letter grade of F, it was one of eight retailers (out of 30) to score zero points, with no significant public facing commitments to address the safety of chemicals used in the products it sells or in its private brands. This is in sharp contrast to other environmental and social responsibility concerns, where Ahold Delhaize has well documented commitments and policies, including publicly reported metrics and clear pathways of executive oversight.

Opportunities for improvement: Ahold Delhaize can make progress by developing a public written safer chemicals policy, setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern, incorporating these requirements into their existing Key Performance Indicator (KPI) tracking and reporting for their “sustainable retailing” program, and completely eliminating and safely substituting BPA and per- and polyfluoroalkyl substances (PFAS) in food packaging and phthalates in food. Ahold Delhaize should become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.

Note – our assessment is primarily based on the policies and practices of Ahold Delhaize, the parent company.



Albertsons

Letter grade = **C-**

Total points = 39.25 out of 135

Albertsons Companies earned a C- grade, scoring 39.25 out of 135 possible points, which reflects significant improvement from its F grade in 2016, resulting in an overall rank of 10th among 30 retailers. The company has made progress in improving its work on chemicals over the past year but there is still need for significant improvement. Albertsons has developed a public [Chemical Policy](#) that states they are, “committed to quality products, product safety, environmental stewardship and sound chemical management, including limiting the use of certain ingredients of consumer concern. We strive for greater transparency and work with our supplier community to maintain and continually improve brand-specific guidelines for our products.” The policy describes some of their initiatives around chemicals of concern. The company maintains a Beyond Restricted Substance List (BRSL) for their Open Nature private label line of products, certifies a number of private label products to EPA Safer Choice, has set restrictions on BPA in packaging, and on parabens, phthalates, and triclosan in their private label baby products. Unlike some other retailers, the policy lacks an accompanying implementation plan. The company has reported significant progress in reducing the use of BPA in canned food liners over the past year, stating that “more than 300 OWN Brands canned goods are now packaged in non-BPA lined cans. This represents more than 80% of our OWN Brands canned offerings. The process will continue until the transition reaches 100%.”

Opportunities for improvement: Albertsons can make progress by developing public BRSLs for a broader assortment of private label and brand name products in key product categories, setting public quantifiable goals with clear timelines for reducing chemicals of high concern, and completely eliminating and safely substituting BPA and per- and polyfluoroalkyl substances (PFAS) in food packaging and phthalates in food. Albertsons should become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.

Note — our assessment is primarily based on the policies and practices of Albertsons, the parent company.



Amazon

Letter grade = **D**

Total points = 30.25 out of 135

Amazon earned a grade of D, which reflects modest improvement from its F grade in 2016, scoring 30.25 out of 135 possible points and ranking 14th in overall points scored among 30 retailers. The company has started to take some actions to address toxic chemicals in the products it sells, but still has much room for improvement. Amazon has no public written safer chemicals policy, however the company has stated it “is in the process of developing and evaluating a chemicals policy.” Over the past year the company has introduced a handful of private label laundry detergent products certified to EPA Safer Choice and set restrictions on certain chemicals like phthalates in these products. Amazon is working to make the Transparency application behind Elements labels available as a service to any retail brand. This system can be used to provide ingredient lists and information about function, safety, sourcing and 3rd-party certifications. It can distinguish products with limited ingredient disclosure from those with comprehensive disclosure, including fragrance ingredients, generic ingredients, contaminants, impurities, and byproducts.

Opportunities for improvement: Amazon should develop a public written safer chemicals policy and set clear public timelines for reducing, eliminating, and safely substituting chemicals of high concern, beginning with its private label apparel, electronics, and formulated household goods. The company should set public quantifiable goals for reducing and eliminating chemicals of concern. Amazon should make it easier for customers to shop for safer products by promoting and marketing products that meet credible third-party safer chemicals certifications such as Safer Choice. Amazon should become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.

Note — Amazon recently acquired Whole Foods Market in August 2017. For purposes of this 2017 report card, Whole Foods Markets has been scored and graded as a separate company.



Apple

Letter grade = **A**

Total points = 103 out of 135

Apple earned a grade of A, scoring 103 points out of 135 possible points, the highest score of 30 retailers. This company [has made impressive strides in this area](#), not only maintaining and regularly updating a restricted substances list (Apple’s Regulated Substances Specification or RSS) but also aiming for full material disclosure of its private label products to analyze every component in the products it sells, with over 20,000 out of 40,000 reviewed so far. Its restricted substance list applies to private label and brand name products, packaging, manufacturing processes, and in-house purchasing. The company has a comprehensive system to ensure compliance, including training on the RSS and on chemicals management more broadly such as through the Apple Environmental Health and Safety Academy.

Since 2003, Apple has reduced or eliminated chemicals of concern from products, including lead, arsenic, brominated flame retardants, and PVC/phthalates from certain components. In 2015, the company eliminated beryllium from various components. Apple also recently reported that it achieved 100% compliance with the RSS “for process chemicals at all final assembly sites.” Apple takes strong steps to ensure the substances used in place of hazardous chemicals are an “environmentally responsible substitution” by requiring alternatives assessments. This company has also created its own Green Chemistry Advisory Board and collaborated with outside groups on safer chemicals and eliminating toxins.

Opportunities for improvement: Apple can make even more progress by setting public quantifiable goals for reducing and eliminating chemicals of concern and expanding its Full Material Disclosure initiative to brand name products sold in Apple stores and on Apple.com. Apple should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.



Babies “R” Us

Letter grade = **F**

Total points = 5 out of 135

Toys “R” Us and subsidiary Babies “R” Us are failing to publicly address toxic chemicals in the products they sell. With a letter grade of “F”, it scored only 5 out of 135 possible points, ranking 22nd out of 30 retailers. It scored points for promoting products that are “natural/organic” including those with certifications for meeting organic standards, and products that they assert are free of chemicals of concern such as 1,4-dioxane, phthalates, parabens, and others. They provide vendors with information regarding lists of chemicals of concern identified by state and national government agencies, but do not currently consolidate them into a Restricted Substances List. While noting that they may require restrictions beyond legal requirements, there is no publicly available evidence that they do so. Without a set policy and process for verifying vendor claims, Toys “R” Us is not taking sufficient action to ensure the products intended for use by infants and toddlers are free from chemicals of concern for developing children.

Opportunities for improvement: Toys “R” Us does not publish a Corporate Responsibility Report or other public facing documents that summarize their efforts to address chemicals of concern. The company could improve its score by providing increased transparency, and by rapidly adopting and implementing policies modeled by other retailers reviewed in this report card. Toys “R” Us should perform a Chemical Footprint assessment, consolidate its lists of chemicals of concern into a formal Restricted Substances List, and set forth a timeline to address chemicals on a shorter Beyond Restricted Substances List for products sold through Babies “R” Us.



Best Buy

Letter grade = **B**

Total points = 71 out of 135

Best Buy earned a B grade by scoring 71 out of 135 possible points, reflecting significant improvement since its C- grade in 2016, and ranking 7th overall among 30 retailers.

Best Buy made significant progress in expanding their work on chemicals over the past year. In August 2017, Best Buy released its new [Chemical Management \(Corporate\) Statement](#) that discusses plans to phase out chemicals of concern and improve chemicals management, states a preference for EPA Safer Choice chemicals, and notes the company has a Restricted Substances List (RSL) and Manufacturing Restricted Substances List (MRSL). Best Buy has not disclosed the content of the RSL or MRSL. The policy applies to operations and manufacturing processes. The company ensures its suppliers comply with the policy through training, audits, and requiring suppliers report usage of the chemicals on the RSL and MRSL. Additionally, the company sells and promotes EPEAT-certified products that are free of certain hazardous chemicals. Best Buy remains active in the Green Chemistry & Commerce Council's Retailer Leadership Council.

Opportunities for improvement: Best Buy can make progress by disclosing the content of its RSL and MRSL, which it pledged in 2016 to release in 2017 but so far has not. Best Buy can also expand the policy to cover packaging and include quantifiable goals for reduction or elimination of chemicals of concern, strengthen oversight of the policy by senior management, and become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.



Bed Bath & Beyond

Letter grade = **D+**

Total points = 35 out of 135

Bed Bath & Beyond and its subsidiary buybuy BABY earned a grade of D+, scoring 35 out of 135 possible points , ranking 12th out of 30 retailers evaluated. This company has started to take [some actions to address toxic chemicals](#) in the products it sells, but still has much room for improvement. Over the years, Bed Bath & Beyond has taken leading-edge steps to restrict specific chemicals of concern, but has not made recent efforts public. The company established a Restricted Substances List (RSL) in 2014, and since 2008 has restricted chemicals like BPA in food-contact items; triclosan in personal care products ; phthalates, lead, and cadmium in baby products; and certain flame retardant chemicals in all products . It urges vendors to seek safer replacements for chemicals on their RSL, which includes a company-wide Manufacturing Restricted Substances List (MRS�) .

Opportunities for improvement: Bed Bath & Beyond and buybuy BABY should increase the transparency of its chemical policy and implementation efforts. The company should establish a specific list of high priority chemicals of concern and a timeline for restrictions in specific product sectors , and commit to evaluating its corporate Chemical Footprint so that it can report on reductions of chemicals of high concern in a manner similar to its reporting of operational reductions of energy and water consumption.



Costco

Letter grade = **C-**

Total points = 43 out of 135

Costco earned a letter grade of C-, significantly improved from an F in 2016, scoring 43 out of 135 possible points and ranking 9th among 30 retailers. The company has made significant progress in improving its work on chemicals. In October 2017, Costco announced their [new Chemical Management Policy](#) which “goes beyond the boundaries of regulatory compliance in an effort to reduce potential chemical harm to humans and to the environment from the product manufacturing process and from consumer use and disposal.” The company encourages suppliers to, ” 1) Identify chemicals of concern (utilizing comprehensive testing programs); 2) Remove or apply the process of informed substitution for any identified chemicals of concern; 3) Identify ways to change their manufacturing processes to reduce hazardous chemical use; and 4) review qualified third-party green certifications.” This builds on Costco’s Smart Screening Program, announced earlier in the year, which ” identifies and removes chemicals of concern in multiple product categories, including chemicals not yet restricted by laws.” In 2017 Costco announced a new partnership with the University of California’s Berkeley Center for Green Chemistry to identify ways to improve their chemical management program, beginning with a focus on three product areas: furniture, textiles, and personal care and household products.

Opportunities for improvement: Costco can continue to make progress by fully disclosing their restricted substance lists by product category, and setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern. Costco should become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.



CVS Health

Letter grade = **B+**

Total points = 83.5 out of 135

CVS Health attained a grade of B+ based on a score of 83.5 out of 135 possible points, the 3rd highest score of any retailer evaluated (tied with IKEA), which is significantly improved from its grade of C in 2016. CVS Health developed a Cosmetic Safety Policy and in 2016 disclosed it developed a list of Chemicals of Consumer Concern (CCCs). The company made significant progress in implementing its policy and increasing its transparency in 2017. In April, CVS Health jointly announced with the Mind the Store campaign that they had [removed parabens, phthalates, and the most prevalent formaldehyde releasers across nearly 600 beauty and personal care products](#) from its store brand CVS Health, Beauty 360, Essence of Beauty, and Blade product lines. The company also publicly released its Restricted Substance List (RSL) for the first time in 2017, and pledged to update it on an annual basis every May. The company states: “(We) actively identify and prioritize the replacement of CCCs with safer alternatives in certain CVS Brand categories, including beauty, baby and personal care, and food products. As new, conclusive research is published on how certain chemical ingredients are linked to health and environmental risks, and safer alternatives are made available, we apply our Cosmetic Safety Policy. This policy outlines our commitments to customer safety, scientific research, supplier collaboration and continuous improvement as well as the evaluation and replacement of CCCs in CVS Brand products.” Last year CVS Health became the first major pharmacy chain in the country to become a signatory of the Chemical Footprint Project.

Opportunities for improvement: CVS can continue to improve its safer chemicals program by setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern, engaging brand name suppliers in the implementation of its policy, expanding its policy to additional chemically intensive product categories, and certifying private label cleaning products to credible third-party standards such as EPA Safer Choice, Made Safe or Green Seal. CVS Health should pilot the Chemical Footprint Project with key private label suppliers.

DOLLAR GENERAL

Dollar General

Letter grade = **F**

Total points = 0 out of 135

Dollar General is failing to publicly address toxic chemicals in the products it sells. With a letter grade of F, it was one of eight retailers (out of 30) in our review to score zero points, with no significant public facing commitments to address the safety of chemicals used in the products it sells. While Dollar General appears to require its suppliers to document compliance with regulatory requirements for product testing and the company states that a third-party laboratory conducts strict product safety testing, it does not appear to have its own restricted chemicals list or otherwise require disclosure or elimination of chemicals of high concern.

Opportunities for improvement: Dollar General can make progress by developing a public written safer chemicals policy, developing and enforcing a public restricted chemicals list, and setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern. Dollar General should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.



Dollar Tree

Letter grade = **D**

Total points = 27 out of 135

Dollar Tree (including Family Dollar) attained a letter grade of D, scoring 27 out of 135 possible points, ranking it 16th out of 30 retailers. The company has started to take some actions to address toxic chemicals in the products it sells, but still has much room for improvement. While Dollar Tree has named a significant group of chemicals for phase-out on a reasonably aggressive timeline, the company has not been transparent about supplier responses and has not reported progress to customers and the public. Building on some previous efforts before 2013 to test for or address certain chemicals, in 2017 this company disclosed its [Commitment to Eliminate Priority Chemicals](#). In this policy, the company lists 17 priority chemicals or classes of chemicals that it expects its suppliers to reduce or eliminate from its products by 2020. Dollar Tree (and Family Dollar) asked its suppliers to report products containing these priority chemicals by January 31, 2017. However, the companies did not publicly disclose the responses. Additionally, Dollar Tree sells certain items on its website that are labeled as BPA-free, which we assumed is connected with its policy to not carry food and beverage containers containing BPA.

Opportunities for improvement: Dollar Tree (including Family Dollar) should disclose its suppliers' responses on which products contain priority chemicals, since they were due in January 2017. The company should also specify how suppliers are to certify any products that are free of priority chemicals. More broadly, Dollar Tree can make progress by establishing and disclosing strong plans for holding suppliers accountable to its chemicals policy and ensuring oversight by senior management. The company can also expand its policy to cover chemicals used in packaging and manufacturing processes, and become a signatory to the Chemical Footprint Project.



The Home Depot

Letter grade = **C+**

Total points = 61.5 out of 135

The Home Depot earned a C+ grade, significantly improved from a D+ in 2016, scoring 61.5 out of 135 possible points and ranking 8th overall among 30 retailers. The company has achieved significant progress on chemicals over the past year, announcing its [new Chemical Strategy](#) in October 2017. The company stated: “The chemical strategy includes commitments to increase the assortment of products that have transparency of product ingredients and third-party certification of chemical ingredients. Additionally, the company is committed to working with suppliers to improve chemicals in categories with the greatest potential impact to indoor air quality, and will conduct annual reviews of product categories to track progress and drive innovation.” The new strategy includes commitments to restrict hazardous chemicals of concern such as flame retardants, PFAS, phthalates, vinyl chloride, triclosan, and others from key product categories like paints, vinyl and laminate flooring, wall-to-wall carpet, and fiberglass insulation. For example, the company has pledged to eliminate nonylphenol ethoxylates (NPEs) and other alkylphenol ethoxylates (APEOs) in paint by 2019. The company has also set restrictions on polyvinyl chloride (PVC), phthalates, triclosan, coal fly ash, and other dangerous chemicals in wall-to-wall carpet, among other chemical restrictions. In 2015, The Mind the Store Campaign and partners worked with The Home Depot to enable them to become the first major retailer to develop a policy to eliminate all added ortho-phthalates in vinyl flooring, setting a major precedent for home improvement and flooring retailers across the nation.

Opportunities for improvement: The Home Depot should implement its new policy by setting public quantifiable goals with clear timelines for reducing and eliminating additional chemicals of high concern such as methylene chloride and NMP in paint strippers; expanding the policy by phasing out the use of ortho-phthalates, halogenated flame retardants and PFAS in other key product categories; and by becoming a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.



Ikea

Letter grade = **B+**

Total points = 83.5 out of 135

Ikea earned a letter grade of B+, scoring 83.5 out of 135 possible points, for the 3rd highest score of any retailer evaluated (tied with CVS Health). Ikea has an impressive long-term and consistent track record of identifying and [phasing out chemicals of high concern](#) in its products well ahead of any government mandate. For example, it eliminated per- and polyfluoroalkyl substances (PFAS) from all of its textiles in 2016. This was also the first year where 100% of the leather used by Ikea was produced with chrome-free processes. Ikea maintains a sophisticated chemical policy with significant staff management resources dedicated to working with its suppliers on chemical safety (and sustainability) of its products. The company started Ikea GreenTech, in which it has invested in DyeCoo Textile Systems, a Dutch company that has developed the first commercially available dyeing technology using no water and fewer chemicals.

Opportunities for improvement: Ikea can implement a more systematic and transparent approach to consumer disclosure of chemical ingredients, become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.



Kohl's

Letter grade = **F**

Total points = 0 out of 135

Kohl's is failing to publicly address toxic chemicals in the products it sells. With a letter grade of F, it was one of eight retailers (out of 30) in our review to score zero points, with no significant public facing commitments to address the safety of chemicals used in the products it sells. While Kohl's appears to require its suppliers to document compliance with regulatory requirements for product content and testing, it does not appear to have its own restricted chemicals list or otherwise require disclosure or elimination of chemicals of high concern.

Opportunities for improvement: Kohl's can make progress by developing a public written safer chemicals policy, developing and enforcing a public restricted chemicals list, and setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern. Kohl's should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.



Kroger

Letter grade = **D-**

Total points = 22.5 out of 135

Kroger earned a grade of D-, the same as in 2016, with 22.5 out of 135 possible points, ranking 17th among 30 retailers. The company has begun take action to address toxic chemicals in the products it sells, but still has much room for improvement. Kroger has no public safer chemicals policy but is currently working with key stakeholders to review options for a future chemicals policy. Over the past year, Kroger has made progress in reducing the use of BPA in canned foods liners. The company has converted 90% of its store-branded canned food liners [away from BPA](#), with the goal to have 100% of its brands of canned food liners to be BPA-free. However, the company has not disclosed a timeframe or plan for completely eliminating and safely substituting BPA in canned food liners. The company has previously taken steps to eliminate triclosan, quaternium-15, phthalates, parabens, and elemental chlorine in pulp of baby products.

Opportunities for improvement: Kroger can make progress by developing a public written safer chemicals policy, setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern, and completely eliminating and safely substituting BPA and per- and polyfluoroalkyl substances (PFAS) in food packaging and phthalates in food. Kroger should become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.

Note — our assessment is primarily based on the policies and practices of Kroger, the parent company.



Lowe's

Letter grade = **D-**

Total points = 20 out of 135

Lowe's earned a D- grade, scoring 20 out of 135 possible points, reflecting a slight decline from its D grade in 2016, and resulting in a rank of 19th among 30 retailers.

The company has [started to take some action to address toxic chemicals](#) in the products it sells, but still has much room for improvement. Lowe's has no public safer chemicals policy. Lowe's adopted a policy to eliminate phthalates in its flooring by the end of 2015, the second largest home improvement retailer in the country to adopt such a policy, and flooring "represented \$3.2 billion in sales for Lowe's last year, or 6% of its \$56 billion total revenues." Lowe's actions helped lead to a major ripple effect among other large home improvement and flooring retailers who joined the market shift away from phthalates in flooring. The company has not announced any major new safer chemicals initiatives since then.

Opportunities for improvement: Lowe's should leverage this success by phasing out phthalates in all other vinyl products it sells, develop a written safer chemicals policy, and set public quantifiable goals with clear timelines for reducing and eliminating additional chemicals of high concern such as methylene chloride and NMP in paint strippers. Lowe's should become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers. Lowe's should also pilot the Health Product Declaration with suppliers.



Macy's

Letter grade = **D-**

Total points = 16 out of 135

Macy's received a letter grade of D-, scoring 16 out of 135 possible points, ranking it 21st out of 30 retailers. The company, which also owns Bloomingdale and Bluemercury, had started to take some actions to address toxic chemicals in the products it sells, but still has much room for improvement. Macy's does not have a public safer chemicals policy. Macy's committed to eliminating flame retardants in the furniture it sold in 2015, but has not publicly discussed the status of this commitment since then. Macy's and its subsidiaries do promote safer products online by highlighting Natural Beauty products, but they don't appear to require any products to be certified to a third-party safer chemicals standard and don't require the disclosure of ingredients to show that these products are in fact safer. The product development organization of Macy's is assessing the factories in the company's supply chain using the Higg index, which measures activities including chemical use and management.

Opportunities for improvement: Macy's should report on the status of its commitment to eliminate flame retardants in furniture. More broadly, Macy's can make progress by developing a written safer chemicals policy and setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern, beginning with its private label products. Macy's should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.

Note — our assessment is primarily based on the policies and practices of Macy's, the parent company.



Office Depot

Letter grade = **F**

Total points = 0 out of 135

Office Depot (which includes OfficeMax) is failing to publicly address toxic chemicals in the products it sells. With a grade of F, it was one of eight retailers out of 30 in our review to score zero points, with no significant public facing commitments to address the safety of chemicals used in the products it sells or in its private brands. Office Depot does promote “green” products and those with “reduced chemicals,” but offers no criteria, credible third-party certifications, or disclosures in order to justify such claims. It also recommends, but does not require, its suppliers to seek, “...safer alternatives for chemicals used in products, packaging...” and to otherwise reduce the use of hazardous chemicals. While we hope that Office Depot’s suppliers accept that recommendation, the lack of requirements, even for just monitoring of progress, and the lack of a clear set of standards to be met, prevent us from awarding any points to Office Depot.

Opportunities for improvement: Office Depot can make progress by developing a public written safer chemicals policy, setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern, and start requiring its suppliers to follow through with the “recommendations” that Office Depot is already making. Office Depot should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.

Note — our assessment is primarily based on the policies and practices of Office Depot, the parent company.



Rite Aid

Letter grade = **D+**

Total points = 36.5 out of 135

Rite Aid earned a letter grade of D+, scoring 36.5 out of 135 possible points, ranking 11th among 30 retailers in overall scoring. The company has started to take some actions to address toxic chemicals in the products it sells, but still has much room for improvement. Rite Aid has begun to develop a safer chemicals program that includes a Beyond Restricted Substances List (BRSL) that will apply to several Chemicals of High Concern (CHCs) in its private label products. Rite Aid's goal is to eliminate these CHCs from its formulated private label products by 2020. Rite Aid has surveyed its suppliers twice and since the initial survey, the number of products containing CHCs and number of suppliers reporting them have decreased. The company plans to audit these responses next year and is actively working with its suppliers to eliminate these chemicals and reformulate products using safer alternatives.

Opportunities for improvement: Rite Aid can make progress by requiring suppliers to disclose all ingredients in their products and establishing a clear process for assessing alternative chemicals for safety to avoid regrettable substitution. Rite Aid should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.

SALLY BEAUTY®

Sally Beauty

Letter grade = **F**

Total points = 0 out of 135

Sally Beauty is failing to publicly address toxic chemicals in the products it sells. With a grade of F, it was one of eight retailers in our review to score zero points, with no significant public-facing commitments to address the safety of chemicals used in the products it sells. Despite substantial public attention to chemicals of high concern in a number of cosmetic and beauty products, there is no indication that Sally Beauty is doing more than that required by regulators to address these challenges.

Opportunities for Improvement: Sally Beauty can make progress by developing a public written safer chemicals policy, setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern, and starting to require its suppliers to disclose chemicals of high concern in their products as a step towards full disclosure. Sally Beauty should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.

SEPHORA

Sephora

Letter grade = **D**

Total points = 27.75 out of 135

Sephora earned a grade of D, scoring 27.75 out of 135 possible points, ranking it 15th out of 30 retailers. On the positive side, they have an extensive Restricted Substances List (RSL) for their private label products, which, according to information provided by the company, includes all but two of the “Hazardous 100+” chemicals identified by Mind the Store. In fact, their RSL, which Sephora stated contained over 1,400 compounds, has been in place for a decade. Unfortunately, Sephora does not make its RSL publicly available, nor does it provide public metrics on the use or reduction of chemicals of concern. Sephora also does not appear to apply restrictions on the use of chemicals in products it sells from other brands.

Opportunities for Improvement: In addition to providing more public information about their ongoing efforts to address chemicals of concern in their private label brands, Sephora can expand their program to include products made by others sold in their stores, first through disclosure and ultimately with an RSL. They can increase transparency of ingredients of their private label brands by disclosing the constituents of fragrances. Sephora should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.

STAPLES®

Staples

Letter grade = **D**

Total points = 30.5 out of 135

Staples earned a grade of D, scoring 30.5 out of 135 possible points, ranking 13th out of 30 retailers. Several years ago, Staples was an emerging leader in [addressing chemicals of concern in the products that it sold](#), becoming the first major retailer to become a signatory of the Chemical Footprint Project, actively participating in partnerships with NGOs and other companies, and earning an award from the US EPA recognizing its efforts to promote Safer Choice certified products. Although progress at the company seems to have slowed, Staples did restrict the use of flame retardant chemicals in private label chairs. While public presentations made in 2013 featured draft Restricted Substances Lists and plans for working with suppliers to reduce hazardous chemicals, its websites and current publicly available documents make no mention of a safer chemical policy or restricted substance list. We are encouraged that Staples has recently shared a confidential draft of a comprehensive chemical policy, which is undergoing peer review, and plans to roll that out with its suppliers in early 2018.

Opportunities for improvement: Staples should adopt a public written safer chemical policy, finalize and enforce a restricted substances list, setting public quantifiable goals with clear timelines to reduce chemicals of high concern, and follow up to its signing on to the Chemical Footprint Project with a public release of its total chemical footprint with a detailed plan to reduce it.



Target

Letter grade = **B+**

Total points = 79 out of 135

Target was awarded a B+ grade, receiving 79 out of 135 possible points, the 6th highest score of any retailer evaluated, which reflects improvement from its B grade awarded in 2016. Target made significant progress in expanding its chemicals management work over the past year. In January 2017, Target announced an [impressive new safer chemicals policy along with ambitious goals](#) to increase transparency of chemicals in products; reduce and eliminate classes of harmful chemicals in textiles, beauty, baby care, personal care, and household cleaning products; and invest in green chemistry research into safer alternatives. The policy applies to the company's "entire value chain, operations and every product" it sells, including both private label and brand name products. The policy includes clear goals and timeframes for reducing harmful chemicals, and the company has committed to expand the policy to address other product categories and chemicals in manufacturing over time. Target has pledged to publicly report on implementation in the year to come. This builds on Target's Sustainable Product Index (SPI), first announced in 2013, which flagged more than 2,000 chemicals of concern for eventual reduction and elimination.

Opportunities for improvement: Target can continue to improve its safer chemicals program by expanding the list of chemicals it's targeting for elimination in textiles and formulated household goods. The company should also expand its policy to address other chemically intensive product categories such as electronics, baby and children's products/toys, food, and food packaging. Target should become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.



TJX Companies

Letter grade = **F**

Total points = 0 out of 135

TJX Companies (the parent of TJ Maxx, Marshalls and HomeGoods) is failing to publicly address toxic chemicals in the products it sells. With a letter grade of F, it was one of eight retailers (out of 30) in our review to score zero points, with no significant public-facing commitments to address the safety of chemicals used in the products it sells. TJX does require audits of its suppliers' factories, but these don't appear to go beyond regulatory compliance. TJX's supplier training program only includes an overview of legal requirements on chemicals and hazardous materials and information on hazardous waste management. TJX does not appear to have a restricted chemicals list or otherwise require disclosure or elimination of chemicals of high concern.

Opportunities for improvement: TJX can make progress by developing a public written safer chemicals policy, developing and enforcing a public restricted chemicals list, and setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern. TJX can also expand its existing audit process to verify compliance with such a policy. TJX should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.

Note – our assessment is primarily based on the policies and practices of TJX, the parent company.

TRADER JOE'S

Trader Joe's

Letter grade = **F**

Total points = 0 out of 135

Trader Joe's is failing to publicly address toxic chemicals in the products it sells. With a letter grade of F, Trader Joe's was one of eight retailers (out of 30) in our review to score zero points, with no significant public-facing commitments to address the safety of chemicals used in its private brands or in the other products it sells. The company reports on its website which of its products have BPA-free packaging, but this does not appear to be connected with an official policy and Trader Joe's doesn't specify the alternative used in place of BPA on its website. This is in contrast to other environmental and social responsibility concerns, for which Trader Joe's has clear policies.

Opportunities for improvement: Trader Joe's can make progress by developing a public written safer chemicals policy, developing and enforcing a public restricted chemicals list in key product categories, setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern, and completely eliminating and safely substituting BPA and per- and polyfluoroalkyl substances (PFAS) in food packaging and phthalates in food. Trader Joe's should become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.



Ulta Beauty

Letter grade = **D-**

Total points = 18.5 out of 135

Ulta Beauty earned a grade of D-, scoring 18.5 out of 135 possible points, ranking it 20th out of 30 retailers evaluated. Ulta Beauty has started taking some actions to address toxic chemicals in the products it sells, but still has much room for improvement. The company earned points for making efforts in recent years to require the suppliers of its private label products to eliminate chemicals of high concern identified in a private list that goes beyond legal requirements as new products are added and existing products reformulated. This list includes prohibitions on parabens, formaldehyde releasing preservatives, BHA & BHT, alkylphenol ethoxylates, and toluene and xylene in nail products. Unfortunately, Ulta has made little of this information public, only sharing limited, non-quantified information with us for the purposes of this report. While it labels its reformulated products as “free from” specific chemicals, this information is not readily searchable on its website or displayed in store, making it difficult for consumers to identify safer products. Ulta does not appear to be taking action with suppliers outside of those producing its private label brands.

Opportunities for improvement: Ulta can make progress by making more information publicly available, setting public and quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern, and starting to work with suppliers other than those of its private label goods to reduce chemicals of high concern. Ulta should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers. Since the U.S. Food and Drug Administration already requires disclosure of ingredients on cosmetic products, Ulta should go beyond compliance with this requirement by working to disclose the ingredients in fragrances and close other loopholes in the mandatory labeling requirements to demonstrate a greater commitment to transparency.



Walgreens

Letter grade = **D-**

Total points = 21.5 out of 135

Walgreens earned a D- grade, scoring 21.5 out of 135 possible points, ranking 18th out of 30 retailers. The company has [started to take some actions to address toxic chemicals](#) in the products it sells, but still has much room for improvement. Walgreens first announced in late 2014 that it was developing a Chemical Sustainability Program but progress was slowed by its merger with Alliance Boots. Most recently, the company has pledged to release a chemicals policy and a Beyond Restricted Substance List (BRSL) in 2018, signifying that it's finally making real progress behind the scenes. Additionally, the company is utilizing the UL WERCS and PurView systems to collect information about chemicals from suppliers to identify where chemicals of concern are found and help inform the development of the company's chemicals policy and Beyond Restricted Substances List (BRSL).

Opportunities for improvement: The company can improve by including clear goals, benchmarks and timelines for implementation of its forthcoming chemicals policy and ensure the policy applies to both private label and brand name products sold in its stores. The company should also certify private label cleaning products to a third-party program such as EPA Safer Choice, Made Safe, or Green Seal. Walgreens should become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.

Note — our assessment is primarily based on the policies and practices of Walgreens (as opposed to the other businesses part of Walgreens Boots Alliance).



Wal-Mart Stores

Letter grade = **A-**

Total points = 87.5 out of 135

Wal-Mart Stores (Walmart and Sam’s Club) earned a grade of A-, improving from a B+ in 2016, and scoring 87.5 out of 135 possible points, the 2nd highest score of any retailer evaluated. In 2017, the company made significant progress in both implementing and expanding their [chemical policy](#), which includes a greater focus on the larger list of 2,700 chemicals, which grew by adding two new authoritative lists of fragrance chemicals of concern. Most recently, Walmart stated a new goal: by “2022, Walmart aims to reduce its consumables chemical footprint for Walmart U.S. and Sam’s Club U.S. stores by 10 percent” which translates to a reduction of toxic chemicals of 55 million pounds. Since 2014, Walmart has reduced the use of “High Priority” chemicals by 96% by weight. The company states that: “All suppliers are expected to reduce, restrict and eliminate use of priority chemicals using informed substitution principles.” The policy applies to cleaning products, cosmetics and personal care products, infant products, and pet supplies, covering approximately 90,000 products and 700 suppliers. The company’s Implementation Guide provides comprehensive guidance to suppliers on how they should work with Walmart to implement the policy. In October 2016, Walmart unveiled its “Sustainable Packaging Playbook,” which also encourages suppliers to identify, restrict, and remove its priority chemicals from packaging, while avoiding polyvinyl chloride (PVC or vinyl) plastic in packaging.

Opportunities for improvement: Walmart can continue to improve its safer chemicals program by setting a more ambitious Chemical Footprint reduction goal going beyond 10%, expanding the policy to include key chemically intensive product categories such as apparel, electronics, and furniture, piloting the Chemical Footprint Project with key private label suppliers, and reducing priority chemicals in use by Sam’s Club, which grew 13% by weight since 2014.



Whole Foods

Letter grade = **B+**

Total points = 82.25 out of 135

Whole Foods Market, which was recently acquired by Amazon in August 2017 but is scored separately here, earned a letter grade of B+, scoring 82.25 out of 135 possible points, the 5th highest score of 30 retailers evaluated. Whole Foods Market has [several policies around chemicals](#) – including the Eco-Scale rating system, the first cleaning product standard of any retailer; Body Care Quality Standards; and protocols for chemicals not allowed in packaging, such as BPA in can linings. The Eco-Scale rating system prohibits between 52 and 326 chemicals in products, depending on their rating, and requires nearly full ingredient disclosure on labels and third-party verification. This process also means that almost all ingredients must be disclosed to Whole Foods Market for a safety evaluation, and enzyme blends are vetted by a third-party auditor. Whole Foods Market evaluates the ingredients in the body care products it sells and has banned 117 chemicals in all products in this category and 471 chemicals for Premium Body Care products. Whole Foods Market expanded both lists of banned chemicals in body care products over time, to prohibit ingredients previously found in these products. Additionally, they've reported metrics to show progress in moving away from BPA in packaging.

Opportunities for improvement: Whole Foods Market can make progress by expanding its policy to cover additional product categories and chemicals in manufacturing processes, including specific public quantifiable goals for the reduction or elimination of chemicals of high concern, and completely eliminating and safely substituting BPA and per- and polyfluoroalkyl substances (PFAS) in food packaging and phthalates in food it sells. The company can also augment its practices for holding suppliers accountable to the policy. Whole Foods Market can also require full disclosure of fragrance ingredients, both publicly and to itself. The company should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.

Key Findings

A careful analysis of retailer progress across fourteen scoring criteria revealed five major findings:

- 1. IMPROVING:** The nation's largest retailers are driving a race to the top to ensure that safer chemicals are used to make and package their products.
- 2. LEADING:** Other retail leaders on safer chemicals were newly identified by expanding the evaluation to 30 major firms that dominate US retail sectors.
- 3. LAGGING:** Two-thirds of retailers surveyed are serious laggards, failing to implement safer chemical policies, with 40% earning D's and 30% F grades.
- 4. REDUCING:** Retailers are driving toxic chemicals from the market, but more effort is needed to avoid regrettable substitutes as alternatives.
- 5. BY SECTOR:** Some retail sectors are relatively high performers while other sectors seriously lag behind in ensuring the chemical safety of products.

- 1. IMPROVING:** The nation's largest retailers are driving a race to the top to ensure that safer chemicals are used to make and package their products.

The Mind the Store campaign has evaluated the safer chemical policies and practices of certain large U.S. retailers in both 2016 and 2017. The average grade for the thirty retailers assessed this year was a D+, the same average grade earned by the eleven retailers evaluated in 2016.

However, the average grade for the eleven retailers assessed in both years improved from D+ to C, marking good progress toward reducing the use of harmful chemicals in the products they buy and sell. Seven of these retailers demonstrated substantial improvements over the last year, perhaps in response to consumer concern and the Mind the Store campaign.

Two leading retailers substantially expanded their existing safer chemical policies and programs in the last year. As a result, their grades improved, as shown below along with each retailer's overall ranking (in points) among all thirty retailers evaluated in 2017.

- **Wal-Mart Stores** (Walmart and Sam's Club) improved from B+ to A-, ranking #2
- **Target** improved its grade from B to B+, and ranks #6

The five most improved retailers either adopted safer chemicals policies for the first time or substantially expanded existing programs this past year. As a result, their grades jumped significantly higher:

- **CVS Health** improved from a C to a B+ and climbed into a tie for the #3 spot
- **Best Buy** rose from a C- to a B and is now ranked #7
- **The Home Depot** rose in grading from a D+ to a C+ and ranks #8
- **Costco** improved the most from an F to a C- and now ranks #9 overall
- **Albertsons Companies** improved its grade from an F to a C- and ranks #10

Additionally, **Amazon** reported modest progress and their grade rose from an F to a D (not including its recently acquired subsidiary Whole Foods Market, which was scored separately). Amazon indicates that it's "developing and evaluating a chemicals policy."

2.

LEADING: Other retail leaders on safer chemicals were newly identified by expanding the evaluation to 30 major firms that dominate US retail sectors.

The Mind the Store Campaign expanded its second annual Report Card assessment to 30 retailers in 2017, up from 11 the previous year. The selection was based on U.S. sales dominance and other factors in eleven retail sectors, such as beauty products, groceries, office supplies, and dollar stores.ⁱ

Based on this expanded scope, a few high performance retailers were newly identified. They, along with their grades and overall rank in points scored, include:

- **Apple**, earned an A and the overall #1 rank in scoring
- **Ikea**, received a B+ grade, tied for the #3 spot
- **Whole Foods Market**, the grocer acquired by Amazon, scored a B+ for a #5 rank

Overall, one-third of all 30 retailers evaluated in 2017 are leaders in ensuring the chemical safety of the products they buy and sell, earning grades ranging from A to C-.

3.

LAGGING: Two-thirds of retailers surveyed are serious laggards, failing to implement safer chemical policies, with 40% earning D's and 30% F grades.

Too many retailers remain serious laggards without even the most basic policies in place to ensure the chemical safety of the products they buy and sell. Those who scored an F for failing to adopt public policies that address toxic chemicals in their products include:

- The grocery chains of **Ahold Delhaize** (which owns Food Lion, Stop & Shop, Hannaford, and Giant) and **Trader Joe's**;
- Apparel sellers such as **TJX Companies** (which owns TJ Maxx, Marshall's, and HomeGoods) and Kohl's;
- The discounter **Dollar General**;
- The home improvement franchisor **Ace Hardware**;
- Office supplier **Office Depot** (including OfficeMax);
- Cosmetics seller **Sally Beauty**; and
- Children's products seller **Toys "R" Us / Babies "R" Us**.

Eight out of nine of these retailers scored 0 out of 135 possible points, with a lack of any significant public-facing commitments to address the safety of chemicals in their products.

Several other of the largest U.S. retailers also seriously lag behind on safer chemicals. Earning various D grades were **Amazon**, which showed only modest improvement (excluding its new subsidiary Whole Foods Market, which is addressed separately); **Kroger** (including Ralph's and Harris Teeter), whose grade remained flat; **Lowe's**, whose progress was modest; and **Walgreens**, who reported some meaningful, but limited, progress. First-time chemical policies are under development at Amazon and Walgreens, and Kroger is reviewing options for a future chemicals policy, but none have yet been publicly announced. Walgreens plans to publicly release its chemicals policy and Beyond Restricted Substance List in 2018.

Rounding out the 40% of retailers who earned various D grades were several newcomers to the 2017 Report Card: the **Macy's** department store (also includes Bloomingdale's and Bluemercury); cosmetics retailers **Ulta Beauty** and **Sephora**; the discounter **Dollar Tree / Family Dollar**; the office supplier **Staples**; the home furnisher and baby products seller **Bed Bath & Beyond / buybuy BABY** (also includes World Market); and the **Rite Aid** drugstore. Among these retailers, Dollar Tree recently published its first chemicals policy, Rite Aid has not made public its existing policy, Sephora and Bed Bath & Beyond maintain a confidential restricted substances list, Staples has pledged to adopt a chemicals policy in 2018, and Ulta Beauty said it would consider making a public statement on chemicals.

4.

REDUCING: Retailers are driving toxic chemicals from the market, but more effort is needed to avoid regrettable substitutes as alternatives.

While comprehensive policies establish a foundation for retailer success on chemical safety, driving chemicals of high concern from the product supply chain remains a bottom line metric of meaningful progress. Over the past three years, at least a dozen retailers achieved serious reductions or elimination of dangerous chemicals far ahead of any government-imposed restrictions. These include (with overall ranking on points as indicated):

- **Apple (#1)** – Eliminated use of chlorinated organic solvents, N-methylpyrrolidone (NMP), and toluene in the final assembly of its products.
- **Wal-Mart Stores (#2)** – Since 2014, suppliers slashed high priority chemicals by 96% to Walmart and 49% to Sam's Club, and more than halved priority chemicals for Walmart by 68% (all percentage reductions are by weight).

- **CVS Health (#3 tie)** – Removed parabens, phthalates, and major formaldehyde donors from nearly 600 beauty and personal care products across several store brands.
- **Ikea (#3 tie)** – Banned all per- and polyfluoroalkyl substances (PFAS) chemicals from textiles, a major leadership milestone in phasing out these very persistent compounds.
- **Whole Food Markets (#5)** – Eliminated formaldehyde-releasing compounds and oxybenzone from body care products, and phased out BPA in 70% of store-brand cans.
- **The Home Depot (#8)** – Will eliminate alkylphenol ethoxylates (APEs) including NPEs in paints by 2019, and prohibited other chemicals of high concern in many products.
- **Albertsons (#10)** – Phased out BPA in more than 80% of store-branded can linings and in thermal receipt paper.
- **Rite Aid (#11)** – Suppliers eliminated triclosan, formaldehyde, diethyl phthalate, and dibutyl phthalate from its formulated products.
- **Kroger (#17)** – Converted 90% of its store-branded canned foods to non-BPA liners.

Unfortunately, nearly one-half of the 30 retailers evaluated have not publicly reported any progress in reducing or eliminating chemicals of concern over the past three years, including Ace Hardware, Bed Bath & Beyond / buybuyBaby, Ahold Delhaize, Costco, Dollar General, Dollar Tree, Kohl's, Office Depot, Target, TJX, Toys“R”Us / Babies“R”Us, Sally Beauty, Trader Joe's, and Walgreens.

Evaluating safer alternatives remains a challenge for big retailers. Very few retailers provide specific or substantive guidance to suppliers to ensure the safety of the alternatives to targeted chemicals of high concern, and most fail to disclose which alternatives are present in reformulated products. This may contribute to “regrettable substitution,” in which the alternative chemistries raise additional or new health and environmental concerns.

Among the 30 retailers evaluated, **Apple** does the best job by requiring its suppliers to prepare alternatives assessments that document the safety of substitutes before phasing out chemicals of high concern in its supply chain. Apple states that: “For substances that are restricted or regulated and have been replaced with an alternative substance, the supplier is required to ensure the alternative substance is an environmentally responsible substitution. Substitutions should be selected based on minimizing unintended consequences that might occur in phasing out a potentially hazardous

substance. Suppliers shall conduct alternative assessments or obtain these assessments from their raw materials suppliers prior to making a replacement.”

Target aspires to make breakthrough progress on safer alternatives, stating that: “Target will actively pursue and promote new approaches to chemicals development and the commercialization of safer alternatives. Target will contribute resources and expertise to initiatives working to develop safe alternatives for chemicals where no viable alternatives currently exist. Target will support innovation which utilizes green chemistry principles in the development, design, and manufacturing of consumer products.” The company committed to invest up to \$5 million in green chemistry innovation by 2022.

Unfortunately, nearly half of all retailers apparently provide no guidance on avoiding regrettable substitutes. Many other retailers offered only very general, non-mandatory direction to their suppliers on safer alternatives.

5.

BY SECTOR: Some retail sectors are relatively high performers while other sectors seriously lag behind in ensuring the chemical safety of products.

By applying a retailer’s overall grade to each major retail sector that they operate in, the Mind the Store Campaign calculated the average grade for each of eleven retail sectors assessed. Note that this approach only approximates actual sector performance since retailers that operate in multiple sectors were given the same score in each sector but their progress may actually have varied by sector, and only 30 retailers were evaluated overall with far fewer assessed in each sector.

The BEST performing retail sectors outpaced this average grade on chemical safety:

- **Drugstores** (7 retailers with an average grade of C)
- **Electronics** (10 retailers with an average grade of C-)
- **Furniture/Home Goods** (9 retailers with an average grade of C-)
- **Groceries** (14 retailers with an average grade of C-)

The sectors that matched average retailer performance on safer chemicals with a D+ are:

- **Baby and Children's Products** (8 retailers)
- **Apparel** (6 retailers)
- **Beauty and Personal Care Products** (19 retailers)

The WORST performing retail sectors scored below average in safer chemicals grading:

- **Home Improvement** (4 retailers with an average grade of D)
 - **Office Supplies** (3 retailers with an average grade of D-)
 - **Dollar Stores** (2 retailers with an average grade of F)
 - **Department Stores** (2 retailers with an average grade of F)
-

i Special thanks to the Campaign for Healthier Solutions for their partnership in evaluating Dollar General and Dollar Tree in this report card. Learn more about their work at <http://ej4all.org/campaigns-and-activities/campaign-for-healthier-solutions/>

We also thank the Getting Ready for Baby campaign for their partnership in evaluating Babies“R”Us and buybuy Baby in this report card. Learn more about their work at <https://www.gettingready4baby.org/>

Conclusion & Recommendations



Our homes should be our havens. There should be tough safety standards for the products we bring into our children's bedrooms, kitchens, and living rooms. It's time we prioritize the health of our families above the special interests of big chemical corporations.

We've led the world in scientific innovation for a century. If we can develop chemicals to convert sunlight into electricity, then we can lead the world in developing safer, more effective chemicals to use in our cleaning products, clothing, buildings, and electronics.

Retailers are on the frontlines of consumer discontent with product safety and hazardous chemicals in everyday household products. During the past year, some of America's largest retailers have taken significant steps to drive harmful chemicals out of products. However, many other U.S. retailers have failed to demonstrate meaningful progress on chemical safety.

The legal, financial, and regulatory risks associated with toxic chemicals continue to grow. Retailer reputation and customer loyalty are also at jeopardy, especially when the federal government is rolling back regulations intended to safeguard public health from dangerous chemicals. Retailers cannot afford to wait for slow-paced government regulation to catch up with the backlog of thousands of chemicals that remain untested for safety or are already known to be hazardous to public health and the environment. Relying on self-policing by the chemical industry and product manufacturers

will not satisfy the concerns of millions of consumers, who are increasingly voting with their dollars, demanding greater transparency and safer products.

It's time for retailers to "mind the store" by requiring safer chemicals and safer products in order to promote healthy families and a healthful environment.

Recommendations

Based on our findings, we recommend that every major U.S. retailer should:

- 1. POLICY:** Publish a written safer chemical policy, with senior management and board level engagement and accountability for suppliers, which measures and publicly reports on continuous improvement toward reducing, eliminating and safely substituting toxic chemicals in products and packaging;
- 2. GOALS AND METRICS:** Develop clear public goals with timelines and metrics to measure success in eliminating chemicals of concern and reducing retailers' chemical footprint;
- 3. TRANSPARENCY:** Embrace "radical transparency" to meet rising consumer demand for: full public disclosure of chemical ingredients in products and packaging; safer chemicals policies; and progress made in eliminating harmful chemicals and requiring informed substitution; and
- 4. FORESIGHT:** Anticipate being graded in the future on progress made on chemical safety in products sold at retail, whether or not your company was included in the 2016 or 2017 editions of Who's Minding the Store? – A Report Card on Retailer Actions to Eliminate Toxic Chemicals.

Methodology Summary

Who's Minding the Store? — A Report Card on Retailer Actions to Eliminate Toxic Chemicals evaluates the progress made and challenges that remain since [last year's report card](#) and the launch of the [Mind the Store campaign](#), [Campaign for Healthier Solutions](#), and [Getting Ready for Baby](#) campaign. This year's report card addresses the ongoing need for transformational change in the marketplace to promote safer chemicals in products since last year's report card and the

In 2017, *Who's Minding the Store?* evaluated the safer chemicals policies of thirty of the nation's largest retailers: Ace Hardware, Ahold Delhaize, Albertsons, Amazon, Apple, Babies "R" Us, Best Buy, buybuy BABY, Costco, CVS Health, Dollar General, Dollar Tree, The Home Depot, Ikea, Kohl's, Kroger, Lowe's, Macy's, Office Depot, Rite Aid, Sally Beauty, Sephora, Staples, Target, TJX Companies, Trader Joe's, Ulta Beauty, Walgreens, Walmart Stores, and Whole Foods Market (and, as appropriate, their parent or subsidiary companies). These retailers were selected for evaluation because they [were among the top thirty U.S. retailers by sales](#), or they commanded the largest market share in one of eleven major retail sectors (e.g. apparel, beauty and personal care, office supplies, etc.).

Retailers Evaluated in *Who's Minding the Store?* by Key Consumer Sector

Key Consumer Sector	Retailers Evaluated in <i>Who's Minding the Store?</i>
Apparel	Amazon, Kohl's, Macy's, Target, TJX, Walmart
Baby/Children	Amazon, Babies "R" Us (Toys "R" Us), buybuy BABY (Bed Bath & Beyond), Costco, Dollar General, Dollar Tree, Target, Walmart
Beauty & Personal Care	Ahold Delhaize, Albertsons, Amazon, Costco, CVS Health, Dollar General, Dollar Tree, Kohl's, Kroger, Macy's, Rite Aid, Sally Beauty, Sephora, Target, Trader Joe's, Ulta, Walgreens, Walmart, Whole Foods Market
Department Store	Kohl's, Macy's
Dollar Store	Dollar General, Dollar Tree
Drugstore	Amazon, Costco, CVS, Rite Aid, Target, Walgreens, Walmart
Electronics	Amazon, Apple, Best Buy, Costco, Kohl's, Macy's, Office Depot, Staples, Target, Walmart
Furniture/Home Goods	Amazon, Bed Bath & Beyond, Costco, Ikea, Kohl's, Macy's, Target, TJX, Walmart, Target
Groceries	Ahold Delhaize, Albertsons, Amazon, Costco, CVS Health, Dollar General, Dollar Tree, Kroger, Rite Aid, Target, Trader Joe's, Walgreens, Walmart, Whole Foods Market
Home Improvement	Ace Hardware, Amazon, Home Depot, Lowe's
Office Supplies	Amazon, Office Depot, Staples

To evaluate retailers' policies and practices, we developed and applied a scoring rubric against 14 criteria (list below) to evaluate retailers' safer chemical policies and practices. We aligned the criteria with other corporate safer chemicals policies and best practices identified in the [BizNGO Principles for Safer Chemicals](#), [BizNGO Guide to Safer Chemicals](#), and the [Chemical Footprint Project](#). Each

of the criteria was assigned a maximum number of possible points, ranging from 0 to 20 points, weighted based on our best professional judgment as to their importance to the goal of eliminating the use of harmful chemicals in consumer products. We created a tiered grading structure for each criterion, awarding points for partial steps retailers have taken toward the maximum allowable score under each criterion. Across the 14 criteria, there is a maximum possible score of 135 points. We used the same curved letter grading system corresponding to the total number of points that was used in 2016, resulting in final grades that could range from F to A+ (see the grading table on page 60).

After refining and updating the criteria to reflect recent developments in the field, we reviewed publicly available information reported by the retailers, including corporate social responsibility/sustainability reports, websites, news releases and blog posts, in the summer and early fall of 2017. We also reviewed official correspondence between the Mind the Store campaign, Campaign for Healthier Solutions, Getting Ready for Baby campaign, and the thirty retailers selected for evaluation. After an initial evaluation of the retailers, we sent each of the thirty retailers their preliminary score, providing an opportunity to review our findings, disclose additional information, and/or make new commitments in order to correct or improve their draft score and grade. We followed up with each retailer multiple times to ensure that they had received their preliminary grade and understood the report's deadline and process. We then held meetings with a number of retailers to review and discuss our findings. After receiving input, we then adjusted and finalized each score based on any new information that was disclosed. We also slightly refined and updated the scoring rubric, to reflect some of the retailer initiatives and new commitments that did not cleanly fit with our initial sub-criteria under each criterion.

Below is the list of the 14 criteria that describe the “best in class” actions needed to achieve the maximum number of points for each category. The full scoring rubric spreadsheet can be downloaded [here](#).

Key resources for *Who's Minding the Store?*

- [News Release](#)
Read the national news release for the report card
- [Factsheet](#)
Compare how the thirty retailers scored across fourteen criteria (PDF download)
- [Scoring Rubric](#)
Learn about the fourteen criteria for the report (Excel file download)
- [2016 Report Card](#)
Download last year's Who's Minding the Store? retailer report card (PDF download)

Description of Actions Needed to Earn Maximum Points



Policy: Adopted a retailer safer chemicals policy

15 points

Retailer has a written safer chemicals policy that aims to avoid chemicals of high concern (CHCs) beyond regulatory compliance in products or packaging offered for sale. Within its scope, the policy also includes all 5 out of the 5 following elements:

- Sets public quantifiable goals for reducing and eliminating CHCs in the products and/or packaging it sells;
- Applies to both products AND packaging;
- Applies to its entire operations, including facilities and in-house purchasing;
- For at least one major product category, includes a Beyond Restricted Substance List for chemicals of high concern (i.e. CHCs not yet subject to government restriction); and
- For at least one major product category, includes a Manufacturing Restricted Substance List (i.e. CHCs used to manufacture products but not present in the final product).



Oversight: Established management responsibilities and incentives

10 points

The retailer engages its employees, managers and/or directors in implementing its chemical policy for product safety (beyond regulatory compliance) through all 4 of the following 4 activities:

- Assigned a member of senior management with responsibility for chemical policy;
- Includes chemical policy in job descriptions and individual performance metrics;
- Ensures board level engagement in chemical policy; and
- Established financial incentives for senior management related to chemical policies.



Accountability: Ensures supply chain accountability

10 points

The retailer engages in 4 out of 4 practices to assess and ensure supplier conformance with retailer chemical policies:

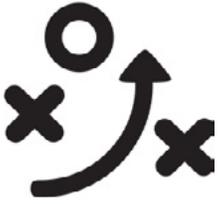
- Audits suppliers to verify chemical data submitted;
- Trains suppliers in chemical policy and/or reporting requirements;
- Requires supplier testing in 3rd party approved laboratories and provide results to assure conformance with chemicals policy; and
- Retailer routinely tests parts, materials, or ingredients provided by suppliers to assure conformance with chemicals policy.



Disclosure: Requires suppliers to report use of chemicals in products to retailer

10 points

Full chemical ingredient information collected for all private label and brand name formulated products AND generic material content for articles (see definition of full chemical ingredient information in appendix on page 63).



Action: Reduced or eliminated chemicals of high concern within the last three years

15 points

The retailer publicly reports on metrics in reducing and eliminating CHCs in past three years across multiple product categories. Metrics include quantifying reductions of CHC by weight, number or percent of products containing or reducing CHC, and/or number or percent of suppliers selling or reducing products containing CHC.



Safer Alternatives: Evaluates safer alternatives, avoids regrettable substitutes

10 points

Strong assurance that detailed alternatives evaluation guidance is being applied; commissioned or required suppliers to conduct a credible hazard assessment for alternatives to chemicals of high concern in products, packaging or operations; and has integrated retailer's criteria for a safer alternative consistent with MTS definition into private label product development process.



Transparency: Demonstrates a commitment to transparency and public disclosure

15 points

Transparency around chemicals policy: Retailer safer chemicals policy and Beyond Restricted Substance List (BRSL) are both publicly available.

Transparency around consumer ingredient disclosure: Retailer requires all suppliers of formulated products and articles to publicly disclose all ingredients online (if applicable) and on product packaging including fragrance ingredients, generic ingredients, contaminants, impurities, byproducts, allergens and nanomaterials.



Chemical Footprint: Evaluates its chemical footprint

7.5 points

Retailer completes the Chemical Footprint Project (CFP) survey; makes score and responses publicly available; retailer is signatory to CFP.



Third-Party Standards: Promotes credible third party standards for safer products

7.5 points

Requires credible third party safer chemicals certification (see appendix on page 61 for examples) in every relevant category of retailer private label products going beyond regulatory compliance.

Extra Credit



Joint Announcement: Public commitment demonstrated through joint announcement

5 points

Participated in a joint public announcement with the Mind the Store, Campaign for Healthier Solutions, or Getting Ready for Baby campaigns.



Continuous Improvement: Shows continuous improvement by steadily expanding safer chemicals policy

15 points

Has demonstrated significant improvement on a consistent basis over the long-term in restricting chemicals of high concern.



Safer Products: Program to promote safer products in stores and/or on website

5 points

Developed program to feature and market safer products on store shelves and/or website.



Collaboration: Actively participates in collaborative process to promote safer chemicals

5 points

Actively participates in a collaborative process to promote safer chemicals OR retains an independent expert institution (not a consulting firm) to assist in meeting the same goal (see appendix on page 61 for examples) OR Created an external Advisory Board to collaborate with stakeholders to seek input into implementation of safer chemicals policy.



Impact Investment: Investing financial resources into independent research into safer alternatives and/or green chemistry solutions

5 points

Company or company foundation invests significant financial resources into independent research into safer alternatives to chemicals of high concern and/or green chemistry solutions.

How we calculated grades

Grading Rubric		
Number of Points		Letter Grade:
Greater than or Equal to:	But Less than:	
105	135	A+
95	105	A
87	95	A-
79	87	B+
71	79	B
63	71	B-
55	63	C+
47	55	C
39	47	C-
31	39	D+
23	31	D
15	23	D-
0	15	F

Appendix: Glossary of Terms

We used these definitions for terms identified in the scoring criteria and findings of *Who's Minding the Store?*. Many of these definitions were developed by the Chemical Footprint Project (CFP). We are adopting their definitions to promote greater alignment with CFP. We thank the CFP team for their work in developing many of these definitions.

Alternatives Assessment (AA): a process for identifying, comparing and selecting safer alternatives to chemicals of concern (including those in materials, processes or technologies) on the basis of their hazards, performance, and economic viability. A primary goal of an Alternatives Assessment is to reduce risk to humans and the environment by identifying safer choices.

Article: An object which, during production, is given a special shape, surface or design, which determines its function to a greater degree than its chemical composition.

Beyond Restricted Substance List (BRSL): hazardous chemicals identified by a company for management, reduction, elimination, or avoidance beyond legal requirements; that is, beyond legally restricted and reportable substances.

The Chemical Footprint Project (CFP): an initiative for measuring corporate progress to safer chemicals. It provides a metric for benchmarking companies as they select safer alternatives and reduce their use of chemicals of high concern.

The Chemical Footprint Project measures overall corporate chemicals management performance through a 20-question survey, scored to 100 points, that evaluates:

- Management Strategy (20 points)
- Chemical Inventory (30 points)
- Footprint Measurement (30 points)
- Public Disclosure and Verification (20 points)

Chemical of High Concern (CHC): substances that have any of the following properties: 1) persistent, bioaccumulative and toxic (PBT); 2) very persistent and very bioaccumulative (vPvB); 3) very persistent and toxic (vPT); 4) very bioaccumulative and toxic (vBT); 5) carcinogenic; 6) mutagenic; 7) reproductive or developmental toxicant; 8) endocrine disruptor; or 9) neuro-toxicant. "Toxic" (T) includes both human toxicity and ecotoxicity.

Chemical Footprint Project Signatories: Signatories of the Chemical Footprint Project agree to:

- Encourage companies in their sphere of influence to participate in the Chemical Footprint Project,
- Be listed on the Chemical Footprint Project website, and
- Provide feedback on how to improve implementation of the Chemical Footprint Project

Chemicals in Products: chemicals that are intended or anticipated to be part of the finished product. Examples include dyes, silicone finishes, screen printing, inks, labels, flame retardants, a durable water repellent chemical formulation, or a chemical plasticizer added to a plastic product or component.

Chemicals Policy: a statement of how a company manages chemicals in its materials, supply chains, products, packaging, and/or operations beyond what is required by regulation.

Collaborative Processes to Promote Safer Chemicals: Examples of such initiatives include the Beauty and Personal Care Products Sustainability Project (BPC); the BizNGO Workgroup for Safer Chemicals and Sustainable Materials (BizNGO); Green Chemistry & Commerce Council's (GC3) Retailer Leadership Council (RLC) or GC3 Preservatives Project; and the Zero Discharge of Hazardous Chemicals (ZDC) Program.

Credible Third-Party Safer Chemicals Standards: include Cradle to Cradle, EPEAT Gold, EWG Verified, GreenScreen Certified, Green Seal, Made Safe, and Safer Choice (formerly known as Design for the Environment).

Disclosure: synonymous with "public disclosure," meaning that information is available to the general public through means such as print media, Internet/web sites, in annual progress and sustainability reports, at investor and stakeholder meetings, or on packaging.

Formulated Product: a preparation or mixture of chemical substances that can be gaseous, liquid, or solid (e.g., paints, liquid cleaning products, adhesives, coatings, cosmetics, detergents, dyes, inks, or lubricants). Can be an intermediate product sold to another formulator, fabricator, or distributor, or a final product sold to a consumer or retailer.

Full Chemical Ingredient Information:

For articles: a company knows:

- 95% of the intentionally added substances by mass; and
- any impurities that are both a CHC and present at 1000 ppm or higher in a homogeneous material.

For formulated products: a company knows:

- 100% of the intentionally added substances by mass; and
- any impurities that are both a CHC and present at 100 parts per million (ppm) or higher in the formulation.

Generic Material Content is defined as the general name of a material, such as steel, nylon fabric, adhesive, or type of plastic (e.g., polyethylene terephthalate (PET)). CAS# is not required.

Green chemistry: the design of chemical products and processes that reduce or eliminate the use and generation of hazardous substances. See The 12 principles of Green Chemistry – <https://www.epa.gov/greenchemistry/basics-green-chemistry#twelve>.

GreenScreen® for Safer Chemicals: a method for comparative Chemical Hazard Assessment (CHA) that can be used for identifying chemicals of high concern and safer alternatives.

GreenScreen® considers 18 human and environmental health endpoints and can be used to evaluate the hazard of a single chemical or mixtures and polymeric materials. GreenScreen® uses a set of four benchmarks to screen out chemicals that are associated with adverse health and environmental impacts. Chemicals that do not pass through Benchmark 1 are deemed Chemicals of High Concern and should be avoided; chemicals at Benchmark 2 are categorized as usable, but efforts should be taken to find safer alternatives; Benchmark 3 chemicals are those with an improved environmental health and safety profile but could still be improved; and chemicals that pass through all four benchmarks are considered safer chemicals and are therefore preferred.

GreenScreen® List Translator: an abbreviated version of the full GreenScreen® method that can be automated. It is based on the hazard lists that inform the GreenScreen® method. The GreenScreen® List Translator maps authoritative and screening hazard lists, including GHS country classifications, to GreenScreen® hazard classifications. The GreenScreen® List Translator can be accessed through tools such as Healthy Building Network's [Pharos Chemical and Material Library](#), a fee-for-service database.

Hazard (chemical): inherent property of a substance having the potential to cause adverse effects when an organism, system, or population is exposed, based on its chemical or physical characteristics.

Hazard Assessment: the process of determining under what exposure conditions (e.g., substance amount, frequency and route of exposure) a substance can cause adverse effects in a living system. Toxicology studies are used to identify the potential hazards of a substance by a specific exposure route (e.g., oral, dermal, inhalation) and the dose (amount) of substance required to cause an adverse effect.

Hazardous 100+ List of Chemicals of High Concern (Hazardous 100+): The Hazardous 100+ List of Chemicals of High Concern represents a small subset of all inherently hazardous chemicals of concern to which humans and the environment may be exposed in certain consumer products. Scientists have established links between exposures to many of these chemicals and chronic diseases and health conditions, including cancer, infertility, learning and developmental disabilities, behavioral problems, obesity, diabetes, and asthma. [The list is available online here.](#)

Manufacturing Restricted Substance List (MRSL): The MRSL differs from a BRSL because it restricts hazardous substances potentially used and discharged into the environment during manufacturing, not just substances that could be present in finished products. The MRSL takes into consideration both process and functional chemicals used to make products, as well as chemicals used to clean equipment and facilities. It addresses any chemical used within the four walls of a manufacturing facility.

Persistent, bioaccumulative and toxic substance (PBT): a chemical that is toxic, persists in the environment, and bioaccumulates in food chains and, thus, poses risks to human health and ecosystems.

Safer Alternative: a chemical that, due to its inherent chemical and physical properties, exhibits a lower propensity to persist in the environment, accumulate in organisms, and induce adverse effects in humans or animals than chemicals in current use. In addition, the alternative must deliver the needed functional performance. A safer alternative may eliminate the need for the chemical through material change, product re-design, or product replacement; or by altering the functional demands for the product through changes in consumer demand, workplace organization, or product use.

Third-party: an independent person/entity involved in a project, including chemical assessments, that is not biased to the results of the work nor has any vested interest in the outcome of the work.



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