

2019

Who's Minding the Store?

A report card on retailer actions to eliminate toxic chemicals



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Acknowledgements

Who's Minding the Store? — A Report Card on Retailer Actions to Eliminate Toxic Chemicals is the fourth annual evaluation of the safer chemicals programs of the largest retailers in North America.

The report card was published in November 2019 by the [Mind the Store campaign](#) of [Safer Chemicals, Healthy Families](#). The Mind the Store campaign was launched in 2013 and the first report card was published in 2016.

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Partners

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Who's Minding the Store?

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Executive Summary

Amid rising concern about highly toxic 'forever chemicals' that have been found in drinking water and food, major retail chains are taking steps to rid their products and packaging of these PFAS (or per- and polyfluoroalkyl substances). In a first, **The Home Depot** (who earned a B+ grade this year) and **Lowe's** (B-grade) publicly committed to eliminate PFAS from carpeting and rugs by the end of 2019. Several retailers are starting to phase out these dangerous chemicals from food packaging, such as take-out containers and bakery bags, including **Ahold Delhaize** (C-), **Albertsons** (C), **Panera Bread** (D+), **Trader Joe's** (D-), and **Whole Foods** (B+). In addition, Whole Foods prohibited several PFAS in personal care products, and **Staples** (C) is restricting PFAS in textiles and furniture.



That's just one sign of growing market leadership revealed in the fourth annual "Who's Minding the Store?" retailer report card, published by the Mind the Store Campaign of the national nonprofit Safer Chemicals, Healthy Families. This year, we graded a diverse group of forty-three of the largest retailers in the United States and Canada on their progress in ensuring the chemical safety of the products and packaging they sell at more than 190,000 retail stores and online.

Retailers find themselves on the front line of consumer discontent with product safety. Market leadership remains critical because our federal chemical safety system remains badly broken. More than forty thousand industrial chemicals are added to or used to make consumer products and food packaging. The vast majority have never been adequately tested for safety. A couple of thousand are already known to threaten human health

and the environment. The report card benchmarks retailer leadership on improving the chemical safety of products and packaging across fourteen criteria.

The 2019 report card revealed **another major retail trend – food packaging has become a major focus for toxics use reduction**. For example, the nation’s fourth-largest retail grocer, **Ahold Delhaize (C-)**, whose brands include Food Lion, Giant, Hannaford, and Stop & Shop, adopted their first-ever public policy aimed at eliminating the chemical classes of PFAS, ortho-phthalates and bisphenols in food packaging for private-label products.

This grocer was among more than a dozen retail chains that announced major new or expanded safer chemicals policies in the last year. These public commitments mark a systematic approach to reducing or eliminating chemicals of high concern and improving disclosure of chemical ingredients in products and packaging.

Leading Retailers

Retailer	Grade	Points
 Apple	A+	109.75
 Target	A	102.5
 Walmart	A	98.25
 IKEA	A-	89
 Rite Aid	B+	85.5
 Whole Foods Market	B+	81.75
 Sephora	B+	81
 Home Depot	B+	80.5
 CVS Health	B	71
 Lowe's	B-	66
 Walgreens	B-	65.25

These seven ‘most improved’ evaluated retailers of 2019 earned higher grades than their previous ratings by making major new public commitments on safer chemicals during the last year:

- **Ahold Delhaize (C-)** – Adopted a public safer chemicals policy for the first time
- **Bed Bath & Beyond (C+)** – Expanded restrictions to new product categories
- **Dollar General (D)** – Adopted a safer chemicals policy to eliminate eight toxic chemicals in three years
- **Lowe’s (B-)** – Launched a safer chemicals policy and program for the first time
- **Panera Bread (D+)** – Restricted chemicals in food packaging and food gloves
- **Sephora (B+)** – Will reduce key toxic chemicals in brand-name products by 50% in three years
- **Staples (C)** – Launched a safer chemicals policy that restricts several classes of priority chemicals

The top-performing evaluated retailers with the strongest safer chemicals policies and practices have remained relatively constant over the past year. They are **Apple (A+ grade)**, **Target (A)**, **Walmart (A)**, and **IKEA (A-)**. These companies lead the retail sector in best practices.

The average grade earned by all forty-three retailers evaluated was a C-, a slight gain from last year’s D+ average. Overall, 63% of evaluated companies improved over the past year alone. The eleven retailers who have been graded in every year’s report card dramatically improved their average grade from a D+ in 2016, the first year of the report card, to a B- this year.

Fourteen retailers, or about one-third of all retailers evaluated, received an F grade this year for failure to adopt even basic public safer chemicals policies to address toxics that may be in their products and packaging. Nine of these retailers failed to score even a single point out of the possible total of 146.5 points.

Named to the 2019 Retailer Report Card Toxic Hall of Shame are:

- **99 Cents Only** (F)
- **Ace Hardware** (F)
- **McDonald’s** (F)
- **Metro** (F)
- **Nordstrom** (F)
- **Publix** (F)
- **Restaurant Brands International** (F) (includes Burger King, Tim Hortons, Popeyes)
- **Sally Beauty** (F)
- **Sobeys** (F)
- **Starbucks** (F)
- **Subway** (F)
- **TJX Companies** (F) (includes TJ Maxx, Marshalls, HomeSense, Sierra)
- **Ulta** (F)
- **Yum! Brands** (F) (includes Taco Bell, KFC, Pizza Hut, WingStreet)

Lagging Retailers

Retailer	Grade	Points
 Sally Beauty	F	0
 Starbucks	F	0
 Subway	F	0
 TJX Companies	F	0
 Yum! Brands	F	0
 Sobeys	F	0
 99 Cents Only	F	0
 Publix	F	0
 Metro	F	0
 Restaurant Brands International	F	7.75
 McDonald's	F	11
 Ace Hardware	F	11.5
 Nordstrom	F	13.5
 Ulta Beauty	F	13.5

The worst performing evaluated retail sector, which lag behind others in public chemical safety policies and practices, was **restaurants**, with an F grade average for six evaluated retailers.

To reduce potential liability and reputational risk and meet customers’ growing expectation that products and packaging will be free from dangerous chemicals, the Mind the Store Campaign strongly recommends that every retail chain:

- Adopt a written public policy and program to transition to safer chemicals;
- Set specific public goals and timelines for reducing use of chemicals of high concern;
- Disclose all ingredients of products and packaging with help from its suppliers;
- Ensure suppliers transition to safer alternatives and avoid regrettable substitution; and
- Demonstrate continuous improvement in expanding the reach of its safer chemicals policy.

Introduction

It is more important than ever for retailers to leverage their market power and influence to drive hazardous chemicals out of consumer products, packaging, and global supply chains.

Over the past year, the Trump Environmental Protection Agency (EPA) continued with weak implementation of recent reforms to the Toxic Substances Control Act (TSCA). The EPA has weakened or delayed action on hazardous chemicals that can cause cancer, reproductive harm, and other serious illnesses. And the U.S. Food and Drug Administration (FDA), operating under a sixty-year-old law on food additives, has failed to use modern science to assess the safety of thousands of toxic chemicals used in food packaging.



Retailers can play a critical role in filling this growing regulatory void by adopting and implementing comprehensive safer chemicals policies to phase out and eliminate chemicals harmful to our public health and environment.

Retailers that are not properly managing chemical risks can lose the trust of their customers, lose market share to competitors, and may even risk facing significant financial liabilities. Meanwhile, those businesses that manage chemical risks can reap great rewards. A recent [extensive research study](#) into U.S. consumer packaged goods (CPGs) found that 50% of CPG growth from 2013-2018 came from sustainability-marketed products (which include products marketed as free from certain toxic chemicals), despite the fact that sustainability-marketed products represented only 16.6% of the CPG market in dollar sales in 2018. The researchers also found products marketed as sustainable grew 5.6 times faster than conventionally-marketed products.

This report [uncovers](#) a growing sustainability trend amongst North America's largest retailers over the past year: major retailers are increasingly adopting and implementing policies that restrict classes of toxic chemicals such as PFAS and *ortho*-phthalates, in the products and packaging they buy and sell. This is helping to bring safer products into the hands of consumers all across North America and drive the development of safer chemicals and green chemistry solutions.

In this report, you can learn about which of the evaluated retailers are [leading the market movement to safer chemicals](#), how they can continue to implement and expand corporate chemical policies, and which of the evaluated retailers are lagging behind the other evaluated retailers.

As consumers, we have incredible power to drive positive change in the marketplace to build a toxic-free future.

You can use this report to help inform which [companies](#) you'll support and those that you will avoid this holiday season and in the year ahead. For those evaluated companies that are lagging behind the other evaluated retailers, leverage the power of the purse and join us in raising your voice to call for urgent reform. You can use our "[take action](#)" feature to write to the fourteen companies that make up the 2019 retailer report card Toxic Hall of Shame. You can also send customized tweets to all 43 companies, thanking those that have been improving and urging the laggards to step up.

Our campaign's theory of change is working – by publicly benchmarking companies, raising the voices of thousands of consumers, publishing new scientific research, and engaging companies in dialogue and sharing [policy recommendations](#), we are driving a competitive race to the top in the retail sector.

Together we can hold big corporations accountable to ensure the stores we shop at “mind the store.”

Retailer Rankings

In the fourth annual report card on toxic chemicals that can be in consumer products, the Mind the Store campaign evaluated forty-three of the largest retailers in North America.

To review how each retailer was graded in detail, you can:

- See the chart on the following pages to compare how the 43 retailers scored across the 14 categories in the rubric.
- See pages 15-56 for a description of how each retailer scored.

How retailers rank on tackling toxic chemicals

EXTRA CREDIT

	17.5 PTS.  Policy	5 PTS.  Oversight	12.5 PTS.  Accountability	13 PTS.  Disclosure	16 PTS.  Action	13.5 PTS.  Safer Alternatives	18 PTS.  Transparency	7.5 PTS.  Chemical Footprint	8.5 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	
 99 Cents Only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 F
 Ace Hardware	2.5	0	0	0	3	0	1	0	0	0	5	0	0	0	0	11.5 F
 Ahold Delhaize	7.5	5	3.75	0	0	2	6.25	2.25	0	2.5	5	5	0	0	0	39.25 C-
 Albertsons	10	2.5	2.5	0	12	3.25	6.5	0	3.75	0	5	2.5	2.5	0	0	50.5 C
 Aldi	13.5	2.5	7.5	0	15	3.25	9	0	4.5	0	0	2.5	5	0	0	62.75 C+
 Amazon	7.5	3.75	2.5	2.5	3	4.5	9	0	3	2.5	10	2.5	5	0	0	55.75 C+
 Apple	16.25	5	10	8.5	16	12.5	9	0	7.5	0	15	0	5	5	5	109.75 A+
 Best Buy	12.5	5	7.5	2.5	0	4.5	5	0	1.5	0	0	2.5	5	0	0	46 C-
 Buy Buy Baby	12.25	2.5	7.5	5	6	4.5	8.25	0	0	0	10	0	0	0	0	56 C+

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 Canadian Tire	8.75	1.25	0	0	13.5	0	7.5	0	0	2.5	5	0	0	0	38.5 D+
 Costco	12	2.5	7.5	0	3	6.5	7	0	3	0	5	0	0	0	46.5 C-
 CVS Health	10	5	5	6	15	2	9	1.5	0	0	10	2.5	5	0	71 B
 Dollar General	10	2.5	1.25	3.5	0	4.5	3.25	0	0	0	5	0	0	0	30 D
 Dollar Tree	7.5	0	2.5	2.5	0	2	9.75	4.5	0	0	7.5	0	0	0	36.25 D+
 The Home Depot	8.75	2.5	7.5	8.5	15	4.5	8.25	0	3	2.5	10	5	5	0	80.5 B+
 Ikea	15	2.5	10	6	15	11.5	6.5	0	0	0	15	0	5	2.5	89 A-
 Kohl's	12.5	5	7.5	0	3	2	7.5	0	7	0	5	5	0	0	54.5 C
 Kroger	3.75	1.25	1.25	0	13.5	2	1.5	0	3	0	5	5	5	0	41.25 C-

How retailers rank on tackling toxic chemicals

EXTRA CREDIT

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 Restaurant Brands International	1.25	0	2.5	0	3	0	1	0	0	0	0	0	0	0	7.75 F
 Rite Aid	12.5	2.5	8.75	3.5	15	4.5	12.5	3	0.75	5	10	2.5	5	0	85.5 B+
 Sally Beauty	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 F
 Sephora	12.5	5	7.5	8.5	12	2	8.75	0.75	1.5	0	10	5	5	2.5	81 B+
 Sobeys	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 F
 Staples	5.5	2.5	2.5	5	0	6.5	8.25	1.5	3	0	5	2.5	5	2.5	49.75 C
 Starbucks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 F
 Subway	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 F
 Target	13.75	5	7.5	7.5	15	8.5	9	6	5.25	0	10	5	5	5	102.5 A



99 Cents Only

Letter grade = **F**

Total points = 0 out of 146.5

99 Cents Only Stores is still failing to publicly address toxic chemicals that may be in the products it sells. With a letter grade of F, it was one of nine retailers out of 43 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.

99 Cents Only Stores stated in the past that it “is committed to providing safe, quality products to its customers, including national brands, that meet or exceed applicable federal and state requirements,” but this statement does not describe how the company is managing the chemicals in its products and ensuring product safety or what the company is doing to go beyond basic regulatory compliance. The company does not appear to have a beyond restricted substance list (BRSL) or otherwise require disclosure or elimination of chemicals of high concern (CHCs). In 2019, the company agreed to meet with the Campaign for Healthier Solutions but as of November 2019 has so far not committed to act on toxic chemicals in its products.

Opportunities for improvement: 99 Cents Only Stores can make progress by developing a public written safer chemicals policy, developing and enforcing a public beyond restricted substance list, and setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern, especially per- and polyfluoroalkyl substances (PFAS), toxic flame retardants, and phthalates that may be in the products it sells. We also urge the company to eliminate and safely replace toxic indirect food additives in food contact materials, with special attention paid to any bisphenols and PFAS that may be in food packaging and other food contact materials as well as any phthalates that may be in food and food contact materials in its supply chain. The company should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.



Ace Hardware

Letter grade = **F**

Total points = 11.5 out of 146.5

Ace Hardware is still failing to publicly address toxic chemicals that may be in the products it sells. With a letter grade of F and a score of 11.5 points out of 146.5, it ranked 32nd out of the 43 retailers evaluated this year.

This is the third year that Ace Hardware has been included in the report card and its third year earning an F. While in years past the retailer earned zero points, this year it earned 11.5 points for taking action to eliminate paint removers that contain the toxic chemicals methylene chloride and N-methylpyrrolidone (NMP). Ace was a target of a Mind The Store petition with over 90,000 signatures calling for this after falling behind many of its peers in the hardware sector in eliminating these chemicals. While the action was late in coming – and the company left the door open for its franchisees to continue to sell those deadly products – the action was not required by regulatory actions and represents a small step in the right direction.

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 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 (CHCs) and identifying and promoting safer alternatives.

Opportunities for improvement: Ace Hardware can make progress by developing a public written safer chemicals policy, developing and enforcing a comprehensive public beyond restricted substance list (BRSL), and setting comprehensive public quantifiable goals with clear timelines for reducing and eliminating any CHCs, especially per- and polyfluoroalkyl substances (PFAS), toxic flame retardants, and phthalates that may be in products it sells. Ace Hardware should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.



Ahold Delhaize

Letter grade = **C-**

Total points = 39.25 out of 146.5

Ahold Delhaize, the parent company of many familiar supermarket chains, including Food Lion, Stop & Shop, Giant, and Hannaford, earned a letter grade of C-, which reflects a significant improvement from its F grade in 2018. The company scored 39.25 out of 146.5 possible points, ranking 22nd out of the 43 retailers evaluated this year.

This improvement was driven by the retailer's September 2019 announcement of a new safer chemicals policy called its Sustainable Chemistry Commitment. This policy, which applies to the products and packaging of all its private-label items (including those in grocery, baby food, infant formula, and formulated laundry, home and personal care, cosmetic, and baby products), includes a beyond restricted substance list (BRSL) that, according to the retailer, prohibits the use of many priority chemicals of high concern (CHCs), including per- and polyfluoroalkyl substances (PFAS), bisphenols, and phthalates. Parts of this policy will come into effect in 2020, and the retailer has committed to expanding its efforts through steps such as participating in the Chemical Footprint Project that will likely improve its score in future report cards.

Opportunities for improvement: Ahold Delhaize can continue to make progress by adding greater specificity to its safer chemicals policy to more clearly address how suppliers will be held accountable, how chemical ingredients are to be disclosed to the retailer, and how suppliers evaluate and implement safer alternatives to CHCs. Additionally, the retailer can increase transparency by making its BRSL public, increasing the disclosure of full chemical ingredients on labels, and providing quantifiable public metrics. Efforts the retailer has started with its private label suppliers should also be replicated for branded products it sells.

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



Albertsons

Letter grade = **C**

Total points = 50.5 out of 146.5

Albertsons earned a letter grade of C, which reflects a slight increase from its C- grade in 2018. The company scored 50.5 out of 146.5 possible points, ranking 17th out of the 43 retailers evaluated this year.

Since 2017, Albertsons has had a safer chemicals policy, which applies to specific product categories amongst its private brands. Albertsons has specifically targeted BPA across the packaging of its private brands, having set a goal for eliminating the chemical and reporting on progress along the way. For specific private-label brands, Albertsons has additional provisions, including a beyond restricted substance list (BRSL) for its Open Nature line and EPA Safer Choice certification for some cleaning products, but since they are not universal across product categories, we do not award points for them. Testing commissioned this year by the Mind the Store campaign and Toxic-Free Future identified the likely presence of PFAS in some of the tested samples of Albertsons private-brand products, and in response, the retailer worked with its suppliers to eliminate a PFAS coating from some bakery and prepared food packaging (cake plates), which is a positive step forward.

Opportunities for improvement: Albertsons can make progress by developing and enforcing a public BRSL that applies to all of its private-label brands as well as brand-name products in key categories and setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern (CHCs). In particular, we urge the company to eliminate and safely replace toxic indirect food additives in food contact materials, with special attention paid to any bisphenols and per- and polyfluoroalkyl substances (PFAS) that may be in food packaging and other food contact materials (besides in the cake plates that it has acted on) as well as any phthalates that may be in food and food contact materials in its supply chain. Albertsons 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 Albertsons, the parent company.



Aldi

Letter grade = **C+**

Total points = 62.75 out of 146.5

Aldi earned a letter grade of C+, which is lower than the B- it earned last year and reflects a lack of significant forward momentum in 2019. The company scored 62.75 out of 146.5 possible points and ranked 12th out of the 43 retailers evaluated this year.

Aldi US has not adopted a comprehensive chemicals policy that encompasses all the products it sells, including any toxic additives in food contact materials. However, the company has made significant progress in addressing chemicals in apparel, household textiles, and footwear. The company committed to achieving the goals of the Greenpeace Detox Campaign to reduce negative impacts on the environment and health caused by chemicals used in the textile and footwear industries. Aldi US has a Manufacturing Restricted Substance List (MRSL) and Restricted Substance List (RSL) (functioning as a beyond restricted substance list (BRSL)) that apply to apparel, household textiles, and footwear, and are incorporated into all supplier contracts. It is making steady progress in achieving its quantifiable goals for reducing eleven groups of chemicals of high concern (CHCs) in these product categories. Aldi conducts trainings for suppliers and requires OEKO-TEX certification for textiles, which involves testing by third-party approved laboratories. The company also has a limited safer chemicals policy applying to non-food products sold under its private-label Little Journey brand, and Little Journey food pouches are BPA-free.

Opportunities for improvement: Aldi US can make progress by developing a comprehensive public written safer chemicals policy that addresses all products that it sells, including any toxic indirect food additives that may be in food contact materials, and giving priority to store brands. Building on its policies for textiles, the comprehensive policy should include setting public quantifiable goals with clear timelines for reducing and eliminating CHCs in all products. In particular, we urge the company to eliminate and safely replace toxic indirect food additives in food contact materials, with special attention paid to any bisphenols (beyond BPA) and per- and polyfluoroalkyl substances (PFAS) that may be in its food packaging and other food contact materials as well as any phthalates that may be in its food and food contact materials in its supply chain. The company should become a signatory to the Chemical Footprint Project.



Amazon

Letter grade = **C+**

Total points = 55.75 out of 146.5

Amazon earned a letter grade of C+, which reflects an improvement from its C grade in 2018. The company scored 55.75 out of 146.5 possible points, ranking 14th out of the 43 retailers evaluated this year.

The company has continued to make progress over the past year by banning the sale of methylene chloride- and NMP-based paint removal products. These are, notably, the first brand-name products in which Amazon has restricted toxic chemicals since it launched its safer chemicals policy last fall. The company also expanded its safer chemicals policy to Amazon-owned private-brand baby, household cleaning, personal care, and beauty products in the E.U.

Last year, it developed a new safer chemicals policy, which includes a beyond restricted substance list (BRSL) targeting more than 50 chemicals of concern for elimination in Amazon private-brand baby (shampoo, lotion, wipes), household cleaning (all-purpose, kitchen, and bathroom cleaners), personal care (shampoo, sanitizers, moisturizers), and beauty (make-up) products. The company noted that it “began [its] reformulation efforts towards this goal with Private Brand formulated products because [it has] the most control over how these products are developed.” The policy does not yet address other private-brand products or brand-name products (besides the paint strippers) on Amazon.com, though the company stated that “in 2019 Amazon will continue to work on additional product category RSLs under this Chemicals Policy, and work to achieve fuller ingredient disclosure on its Private Brand product detail pages.” The company has yet to disclose this work.

On transparency, the policy states: “Our goal is to make product health and sustainability data as easy for customers to access and interpret as price and customer reviews. This is why we are working on website features that will make it easier for customers to access comprehensive information about product ingredients and third-party certifications. ... We hope that making this information more readily available for customers will encourage additional brands to move away from potentially hazardous chemistries in their products and adopt safer chemistries.” Amazon cites Safer Choice, Made Safe, Green Seal and Cradle to Cradle as examples of third-party standards it is focused on. The company has yet to disclose progress on these transparency efforts.

Opportunities for improvement: Amazon can make progress by setting public quantifiable goals with clear timelines for reducing and eliminating additional chemicals of high concern (CHCs), especially per- and polyfluoroalkyl substances (PFAS), toxic flame retardants, and phthalates. The company should publicly report on metrics in implementing its goals on an annual basis. In 2019-2020, Amazon should expand its safer chemicals policy to other chemically intensive private-label product categories, particularly electronics, apparel, and food contact materials. As a growing retailer of food, Amazon should eliminate and safely replace toxic indirect food additives in food contact materials, with special attention paid to any bisphenols and per- and polyfluoroalkyl substances (PFAS) that may be in food packaging and other food contact materials as well as phthalates that may be in food and food contact materials in its supply chain. The company should also expand the policy to restrict highly hazardous chemicals in brand-name products sold on Amazon.com, building on its work to phase out methylene chloride and NMP in paint and coating removal products. Amazon should become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.

Note: Amazon acquired Whole Foods Market in August 2017. Whole Foods Markets has been scored and graded as a separate company, given that the two companies' safer chemicals policies are significantly different.



Apple

Letter grade = **A+**

Total points = 109.75 out of 146.5

Apple earned a letter grade of A+, the same letter grade it achieved last year. The company scored 109.75 out of 146.5 possible points and ranked 1st out of the 43 retailers evaluated this year.

In 2018, Apple had continued to make impressive strides by maintaining and frequently updating a beyond restricted substance list (BRSL), Apple's Regulated Substances Specification (RSS), but also aiming for full material disclosure of its private-label products to analyze every component in the products it sells, with more than 25,000 out of 50,000 reviewed at that time. According to the company's 2019 Environmental Responsibility Report (ERR), Apple collects "detailed chemical information for tens of thousands of components and over 75 percent of product mass for new iPhone, iPad, and Mac products."

Its RSS 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. In 2018, Apple revised its RSS by adding or strengthening restrictions for a number of chemicals in products, including chemicals on the REACH Candidate List for Substances of Very High Concern (unless pre-approved by Apple), and established "non-use" restrictions for manufacturing process chemicals.

The company has not revised its RSS since the 2018 report card was released, but in late November 2018, Apple released a Chemical Prioritization Protocol to help the company identify chemicals that may need to be managed by qualitatively assessing information on chemical hazard, use, exposure potential, and public concern. The company used the protocol to determine which chemicals to add to its RSS last year before the protocol was officially released. Apple is also piloting, at some of its facilities, a tool the company helped develop that standardizes reporting on the use of manufacturing process chemicals in the electronics industry.

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 reported that it achieved 100% compliance with the RSS "for process chemicals at all final assembly sites" in 2015, 2016, 2017, and 2018. Apple takes strong steps to ensure the substances used in place of hazardous chemicals are an "environmentally responsible substitution" by requiring alternatives assessments and evaluates alternatives using the GreenScreen Framework and EPA's Safer Choice Program. The company replaced hazardous cleaning chemicals used in final assembly facilities with safer alternatives that are free from chemicals designated as Benchmark-1 or -2 and List Translator-1. The 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 transparent public, quantifiable goals with specific timelines for reducing and eliminating chemicals of concern, including per- and polyfluoroalkyl substances (PFAS) that may be present in packaging, and by expanding its Full Material Disclosure (FMD) initiative to brand-name products sold in Apple stores and on Apple.com. The company should consider restricting CHCs that may be present in the building materials for new or renovated Apple stores. Apple should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.



Best Buy

Letter grade = **C-**

Total points = 46 out of 146.5

Best Buy earned a letter grade of C-, which is lower than its grade last year of C and reflects a lack of significant forward momentum in 2019. The company scored 46 out of 146.5 possible points, ranking 20th out of the 43 retailers evaluated this year.

In 2017, the company made great strides, compared with 2016, by releasing its new Chemicals Management Statement. This document described Best Buy's plans to phase out chemicals of concern and improve chemicals management. The policy applies to operations and manufacturing processes, and the document referenced what was functionally a beyond restricted substance list (BRSL) and a manufacturing restricted substance list (MRSL). However, Best Buy has still not disclosed the content of either the BRSL or MRSL and did not report any progress in 2018 or 2019 on reducing chemicals of concern.

In its 2018 CSR report, Best Buy reported on an initial piloting of its chemicals policy with store-brand TV suppliers. The results from this pilot suggested that perhaps the BRSL or MRSL is not as stringent as it should have been, since research commissioned by Toxic-Free Future and Safer Chemicals, Healthy Families' Mind the Store campaign found that three private-label TVs from Best Buy contained toxic flame retardants. Best Buy staff later noted to us that the TVs that tested positive were discontinued, although the company has not confirmed whether the replacement TVs have been tested to be free of toxic flame retardants. The company expanded the program to all other private-label product categories in FY2019, consistent with the original scope of the 2017 policy.

The company sells and promotes EPEAT-certified products that are free of certain hazardous chemicals but this year did not report on statistics of tons of hazardous waste avoided. Best Buy remains active in the Green Chemistry & Commerce Council's Retailer Leadership Council and is participating in the Responsible Business Alliance (formerly the Electronic Industry Citizenship Coalition).

Opportunities for improvement: Best Buy can make progress by disclosing the contents of its BRSL and MRSL since it pledged in 2016 to release both of these in 2017 but has not done so, even two years later. The company should prioritize the reduction and elimination of halogenated flame retardants in key electronics, such as televisions, and replace them with safer alternatives in the year ahead. Best Buy should also expand the policy to clearly cover packaging, strengthen accountability measures, and set public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern (CHCs) that may be present in products it sells, including per- and polyfluoroalkyl substances (PFAS) and phthalates in addition to toxic flame retardants. The company should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.

KEY SOURCE: <https://corporate.bestbuy.com/wp-content/uploads/2019/06/FY19-full-report-FINAL-1.pdf>



Buy Buy Baby

Letter grade = **C+**

Total points = 56 out of 146.5

Bed Bath & Beyond, including subsidiary buy buy BABY, earned a letter grade of C+, which reflects a significant improvement from its D+ grade in 2018. The company scored 56 out of 146.5 possible points, ranking 13th out of the 43 retailers evaluated this year.

This represents an almost 20-point improvement, driven by the company's: new Priority Chemical List for personal care, cleaning, and cosmetic products; commitment to reformulation of private-label baby personal care products; and restriction of certain flame retardant chemicals in all products and all flame retardant chemicals in certain padded products for nurseries and babies.

Opportunities for improvement: The company can improve its score further by increasing transparency. It should ensure its Priority Chemical List and requirements for making products without chemical flame retardants are made public in its next Corporate Responsibility Report. Bed Bath & Beyond should also sharpen requirements for vendor ingredient disclosure to ensure companies disclose fragrance chemicals, are specific in naming chemicals according to industry standards, and track quantifiable reductions in chemicals that may be present in the vendors' products, including flame retardants, PVC packaging, toxic inks, and priority chemicals in personal care, cleaning, and cosmetic products. Bed Bath & Beyond can also increase its score by expanding its restrictions on harmful chemicals in packaging. As a company known to address chemicals ahead of government regulation, it should consider establishing restrictions on PFAS chemicals which apply to all articles and formulated products.

KEY SOURCE: <https://www.bedbathandbeyond.com/store/static/CorporateResponsibilityReport>



CANADIAN TIRE

Canadian Tire

Letter grade = **D+**

Total points = 38.5 out of 146.5

Canadian Tire earned a grade of D+, scoring 38.5 out of 146.5 possible points, ranking 23rd out of the 43 retailers evaluated this year.

Canadian Tire demonstrated progress on toxic chemicals over the past year by making its safer chemicals policy publicly available on its website and by being the fifth North American retailer to commit to phasing out paint stripping products containing the toxic chemicals methylene chloride and N-methylpyrrolidone (NMP) and achieving this commitment by the end of 2018. Canadian Tire also eliminated six phthalates (DEHP, DBP, BBP, DINP, DIDP, DNOP) from food contact products (which do not include food packaging); removed heavy metals from children's, food contact and cosmetics products; eliminated volatile organic compounds from paints; and is currently completing its transition away from brominated flame retardants in all products.

Opportunities for improvement: Canadian Tire can make more progress by setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern (CHCs) that may be present in the products it sells, especially halogenated flame retardants, any phthalates in food contact products, materials and packaging as well as any bisphenols, including BPS from thermal paper receipts. Canadian Tire should extend its efforts to eliminate PFOA and PFOS from water repellency finishes to the entire class of per- and polyfluoroalkyl substances (PFAS) that may be present in those products. Canadian Tire should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers. Canadian Tire can also improve in the area of transparency by requiring that fragrance ingredients are disclosed online or on the label of personal care and cleaning products and should take steps to ensure supply chain accountability.



Costco

Letter grade = **C-**

Total points = 46.5 out of 146.5

Costco earned a letter grade of C-, which is lower than its grade last year of C and reflects a lack of significant forward momentum in 2019. The company scored 46.5 out of 146.5 possible points, ranking 19th out of the 43 retailers evaluated this year.

In 2019, Costco disclosed that it is phasing out the use of receipt paper coated with BPA or BPS by the end of 2019 in its Canadian stores, but did not disclose whether it was doing the same in the U.S.

In 2018, the company made demonstrable progress in improving its work to address harmful chemicals, most notably by adopting new restrictions on toxic chemicals in textiles and in its manufacturing. Besides the action on thermal receipts, the company has not reported on progress in implementing or expanding the commitments announced last year. The chemical restrictions for textiles announced in 2018 apply to apparel and footwear, textile sporting goods, luggage, handbags, and home textiles, such as blankets, sheets, rugs, and towels. In 2018, the company also notably disclosed chemicals it is restricting in non-foods packaging, expanded the Smart Screening Program, and began encouraging suppliers to attain qualified third-party certifications.

In 2017, Costco announced its 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) Encourage Suppliers to review and attain qualified third-party green certifications.” This builds on Costco’s Smart Screening Program, which “identifies and removes chemicals of concern in multiple product categories, including chemicals not yet restricted by laws.”

Opportunities for improvement: Costco can continue to make progress by fully disclosing its beyond restricted substance lists (BRSLS) by product category, expanding its restrictions on textiles chemicals to eliminate any per- and polyfluoroalkyl substances (PFAS), and setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern (CHCs) that may be present in the products it sells, such as flame retardants, phthalates, and PFAS. As a major food retailer, Costco should eliminate and safely replace any toxic indirect food additives in food contact materials, with special attention paid to bisphenols and PFAS in that may be in food packaging and other food contact materials as well as any phthalates that may be in food and food contact materials in its supply chain. 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 = 71 out of 146.5

CVS Health earned a letter grade of B, which is lower than its 2018 grade of B+. The company scored 71 out of 146.5 possible points, ranking 9th out of the 43 retailers evaluated this year.

The company has continued to implement its Cosmetic Safety Policy over the past year, disclosing that it continued to reformulate products containing chemicals of concern it had pledged action on in 2017. The company stated: “More than 75 percent of these 600 products will be reformulated by the first quarter of 2019 and the remaining 25 percent will be reformulated by the end of the year.” It also shared that: “In 2018, we began removing oxybenzone and octinoxate from our store brand sun screens with SPF 50 and lower, and these products will be reformulated by the end of 2019.”

CVS Health first developed a Cosmetic Safety Policy and, in 2016, disclosed that it developed a list of Chemicals of Consumer Concern (CCCs). In 2017, CVS Health jointly announced with the Mind the Store campaign that it would remove parabens, phthalates, and the most prevalent formaldehyde releasers across nearly 600 beauty and personal care products from its store brands CVS Health, Beauty 360, Essence of Beauty, and Blade. The company also publicly released its beyond restricted substance list (BRSL) for the first time in 2017 and pledged to update it on an annual basis every May but has not followed through on publicly updating it in 2018 or 2019.

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.” In 2016, CVS Health became the first major pharmacy chain in the country to become a signatory to the Chemical Footprint Project.

Opportunities for improvement: CVS Health can continue to improve its safer chemicals program by setting public quantifiable goals with clear timelines for reducing and eliminating other chemicals of high concern (CHCs), especially any per- and polyfluoroalkyl substances (PFAS) that may be present in the products it sells. The company should also expand the policy to cover brand-name suppliers and additional chemically intensive product categories, certify private-label cleaning products to credible third-party standards, such as EPA Safer Choice, Made Safe or Green Seal, and remove bisphenols from thermal receipt paper. CVS Health should pilot the Chemical Footprint Project with key private label suppliers. The company should also require suppliers to conduct testing in third-party laboratories and provide results to the retailer and conduct its own testing to ensure suppliers comply with its BRSL and cosmetics safety policy.

KEY SOURCE: <https://cvshealth.com/newsroom/press-releases/cvs-health-takes-major-step-to-address-chemicals-of-consumer-concern>

DOLLAR GENERAL®

Dollar General

Letter grade = **D**

Total points = 30 out of 146.5

Dollar General earned a letter grade of D, which reflects a significant improvement from its F grade in 2018 and 2017. The company scored 30 out of 146.5 possible points, ranking 27th out of the 43 retailers evaluated this year.

In November 2019, Dollar General shared with us a copy of its written safer chemicals policy that it plans to publish in 2020. The policy includes a commitment to eliminate eight chemicals from Dollar General's private-label formulated products in the home cleaning and beauty & personal care categories by December 2022. The policy also includes expectations for suppliers on reporting chemical ingredient information to Dollar General and states a future preference for safer alternatives to the 8 chemicals on its beyond restricted substance list (BRS�).

Opportunities for improvement: Dollar General can make progress by expanding its BRS� beyond eight chemicals to chemicals including per- and polyfluoroalkyl substances (PFAS), toxic flame retardants, and phthalates, and by expanding the policy to apply to packaging and operations. We also urge the company to eliminate and safely replace any toxic indirect food additives in food contact materials, with special attention paid to any bisphenols and PFAS that may be in food packaging and other food contact materials as well as any phthalates in food and food contact materials in its supply chain. Dollar General should also develop and implement strong accountability measures and do more to encourage, or ideally require, suppliers to publicly disclose the ingredients in their products. The company 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 = 36.25 out of 146.5

Dollar Tree earned a letter grade of D+, which reflects a slight improvement from its D grade in 2018. The company scored 36.25 out of 146.5 possible points, ranking 24th out of the 43 retailers evaluated this year.

The company appears to have strengthened its safer chemicals policy and be taking action to implement it, albeit slowly, and with only limited transparency to-date about how it is supporting, measuring, or ensuring compliance, or about progress toward its current chemical phaseout goal. Key improvements this year include participating in the Chemical Footprint Project survey and posting a basic safer chemicals policy.

Dollar Tree first announced its Commitment to Eliminate Priority Chemicals in June 2017, although according to its recently posted “Chemical Policy,” the company implemented its “sustainable chemical plan” in 2016 (although it appears the implementation only began in that year, and not until late 2016). The commitment lists 17 priority chemicals or classes of chemicals that it expects its suppliers to reduce or eliminate from products by 2020, which is a reasonably aggressive timeline for a significant group of chemicals. However, in its Chemical Policy, Dollar Tree steps back from this goal by stating that it only applies to private-label products. Additionally, Dollar Tree asked suppliers to report products containing these priority chemicals by January 31, 2017, but the company did not publicly disclose the responses. In its Chemical Policy, the company stated that it is requiring suppliers to disclose “full ingredients for formulated products that contain chemicals as part of their base formulation” into WERCS but has not clarified its interpretation of “full ingredients.” Surprisingly, the company is requiring brand-name product suppliers to disclose ingredients online before it is requiring private-label suppliers to do this. In its 2018 Corporate Sustainability Report, Dollar Tree indicated that its products are being tested to determine the presence of those chemicals, even though suppliers were required to report on this in early 2017.

Dollar Tree does sell certain items on its website that are labeled as BPA-free, which we assume is connected with its policy to not carry food and beverage containers containing BPA.

Opportunities for improvement: Dollar Tree (including Family Dollar) should share its timeline for completing the testing of its products. More broadly, Dollar Tree can make progress by establishing and disclosing strong plans for holding suppliers accountable to its chemicals policy, publicly disclosing clear metrics and results, going back to its original plan of working toward eliminating priority chemicals from both private-label and brand-name products, ensuring oversight by senior management, and generally being more transparent about how its policies and commitments will be implemented and what progress is (or is not) occurring. The company should also expand its policy to cover chemicals used in packaging and manufacturing processes, and to per- and polyfluoroalkyl substances (PFAS), all toxic flame retardants, and all phthalates. We also urge the company to eliminate and safely replace toxic indirect food additives specifically in food contact materials, with special attention paid to any bisphenols (beyond BPA) and per- and polyfluoroalkyl substances (PFAS) that may be in in food packaging and other food contact materials as well as any phthalates that may be in food and food contact materials in its supply chain.

KEY SOURCES: https://www.dollartree.com/assets/images/cms/pdfs/Priority_Chemicals_Commitment.pdf;
<https://www.dollartree.com/assets/images/cms/pdfs/Corporate-Sustainability-Report.pdf>



The Home Depot

Letter grade = **B+**

Total points = 80.5 out of 146.5

The Home Depot earned a letter grade of B+, which reflects an improvement from its B- grade in 2018. The company scored 80.5 out of 146.5 possible points, ranking 8th out of the 43 retailers evaluated this year.

The company has continued to demonstrate progress on toxic chemicals over the past year by banning PFAS as a class in carpets and rugs, following through on its commitment to ban methylene chloride- and NMP-based paint strippers, as well as relaunching its Eco Options website. In 2019, the company reported new metrics for implementing its Chemical Strategy and that the company is on track to meet the goals it has set for reducing hazardous chemicals in cleaning products, paints, carpet, and insulation. It reported the reduction is 65% complete for paint, 95% complete for carpet, 90% complete for insulation, and 99% complete for cleaning products.

Previously, in 2017, the company announced its Chemical Strategy and 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 strategy includes commitments to restrict chemicals of high concern (CHCs), such as flame retardants, phthalates, vinyl chloride, and triclosan, from key product categories, including 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 Home Depot 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.

Opportunities for improvement: The Home Depot should continue to implement its new policy by setting public quantifiable goals with clear timelines for reducing and eliminating additional CHCs; expand the policy by phasing out the use of all PFAS, ortho-phthalates, halogenated flame retardants, methylene chloride, and NMP that may be present in other key product categories; and become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers. The company should follow through on its ban of toxic paint strippers by also restricting regrettable substitutes, particularly those containing GreenScreen Benchmark 1 chemicals. The Home Depot should also pilot the Health Product Declaration with suppliers.

KEY SOURCE: https://corporate.homedepot.com/sites/default/files/image_gallery/PDFs/Chemical%20Strategy%2010_2017.pdf



IKEA

Letter grade = **A-**

Total points = 89 out of 146.5

IKEA earned a letter grade of A-, the same letter grade that it achieved in 2018. The company scored 89 out of 146.5 possible points, ranking 4th out of the 43 retailers evaluated this year.

IKEA has an impressive and consistent track record of identifying and phasing out chemicals of high concern (CHCs) from its products. The retailer eliminated per- and polyfluoroalkyl substances (PFAS) from all of its textiles in 2016 and has aggressively reduced or eliminated chemical flame retardants and phthalates from its products. IKEA has a sophisticated chemical policy and appears to devote substantial resources to successfully working with its suppliers on the chemical safety of its products.

Opportunities for improvement: IKEA should do more to be transparent in its approach. IKEA's explicitly stated preference to avoid third-party certifications and public standards and instead rely on its own policies lacks the rigor of an openly debated and public standard. Ultimately, consumers have a hard time actually knowing if there are unaddressed hazards while making industry-wide cooperation and shared learning more difficult. IKEA should also be a public leader in addressing chemicals of concern that may be present in food contact materials in its restaurants and cafes. We also encourage IKEA to expand its ingredient disclosure and become a signatory to the Chemical Footprint Project.

KEY SOURCE: http://www.ikea.com/ms/en_KR/pdf/chemicals_and_Substances_en.pdf

KOHL'S

Kohl's

Letter grade = **C**

Total points = 54.5 out of 146.5

Kohl's earned a letter grade of C, which reflects an improvement from its 2018 grade of D.

The company scored 54.5 out of 146.5 possible points, ranking 15th out of the 43 retailers evaluated this year.

The retailer has a publicly available safer chemicals policy that provides restrictions for its private-label and direct import products that goes beyond regulatory requirements and has integrated the management of the policy within its relatively robust systems for social and environmental monitoring. Recently, Kohl's also implemented the utilization of the Oeko-Tex third-party certification for a significant number of its private-label textile products.

Opportunities for improvement: Kohl's can make progress by making public its beyond restricted substance list (BRSL) and setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern, especially any per- and polyfluoroalkyl substances (PFAS), toxic flame retardants, and phthalates that may be in some of the products it sells. Kohl's should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.



Kroger

Letter grade = **C-**

Total points = 41.25 out of 146.5

Kroger earned a letter grade of C-, which reflects a slight increase from its D+ grade in 2018.

The company scored 41.25 out of 146.5 possible points, ranking 21st out of the 43 retailers evaluated this year.

In 2019, Kroger set a timeline to complete its phase-out of BPA in private-brand packaging (which it first pledged to address in 2011): the end of 2020. It also disclosed it was planning to launch a beyond restricted substance list (BRSL) for apparel in early 2020 and recently joined the AFIRM group. The company also shared that in 2019, it is “slated to introduce reformulated liquid hand wash products that are certified to the U.S. EPA’s Safer Choice standard.” However, Kroger has no public safer chemicals policy.

It reported two years ago that it was working with key stakeholders to review options for a future chemicals policy, but has not launched one or reported any additional progress in developing one since 2018. In 2018, the company shared it “removed parabens, phthalates and formaldehyde donors from several Kroger brand health and beauty care items including skin lotions, skin cleansers, sunscreen, oral care and shampoo.” In 2017, the company reported that it had converted 90% of its store-branded canned food liners away from BPA, and in 2018, it reported that the figure had increased to 92%. However, the company has still not disclosed how it will ensure substitutes are safe.

Opportunities for improvement: Kroger can make progress by developing a public written safer chemicals policy, developing and enforcing a public BRSL for food packaging and other products beyond its limited BRSL for natural and organic products, and setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern (CHCs). In particular, we urge the company to eliminate and safely replace any toxic indirect food additives in food contact materials, with special attention paid to any bisphenols (including in brand-name food packaging) and per- and polyfluoroalkyl substances (PFAS) that may be in food packaging and other food contact materials as well as any phthalates that may be in food and food contact materials in its supply chain. Kroger 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 Kroger, the parent company.



Loblaws

Letter grade = **C**

Total points = 51.25 out of 146.5

Loblaws Companies Limited earned a grade of C, the same letter grade that it achieved last year. The company scored 51.25 out of a possible 146.5 points, ranking 16th out of the 43 retailers evaluated this year.

Loblaws has a public safer chemicals policy that includes a beyond restricted substance list (BRSL) of three chemicals and applies to packaging as well as products. Loblaws's statement on BPA states that the company is committed "to taking measured and educated steps to remove [ingredients of concern], where possible, from [its] products, and is transitioning formula, food and snack products to BPA-free packaging." In its 2017 CSR report, Loblaws disclosed a goal of removing triclosan, phthalates, and plastic microbeads from household, beauty, and cosmetic products by the end of 2018 in the only two private-label product lines that carry these types of products – Life Brand and President's Choice. The company reported progress on this initiative, stating that by the end of 2018, it had formulated all of its Life Brand and President's Choice household, beauty, and cosmetic products without triclosan or phthalates. The company also reported that it continues to encourage suppliers to identify and eliminate phthalates that may come from other sources such as manufacturing equipment and packaging, as it did in 2017. The company also engages an advisory board of two experts to regularly provide input on matters related to the chemicals policy.

Opportunities for improvement: Loblaws can make progress by developing and publicly disclosing expanded BRSLs for a broader assortment of private-label and brand-name products in key product categories and by setting additional public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern (CHCs). In particular, we urge the company to remove all bisphenols, including BPA and BPS, from thermal paper receipts, and eliminate and safely replace any bisphenols and per- and polyfluoroalkyl substances (PFAS) that may be in food packaging and food contact materials as well as any phthalates that may be in food and food contact materials in its supply chain. Loblaws should become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers. Loblaws can also improve its score by enhancing transparency through disclosing fragrance ingredients for private-label and brand-name products online and on product labels.



Lowe's

Letter grade = **B-**

Total points = 66 out of 146.5

Lowe's earned a letter grade of B-, which reflects a significant improvement from its D+ grade in 2018.

The company scored 66 out of 146.5 possible points, ranking 10th out of the 43 retailers evaluated this year.

In 2019, Lowe's announced new restrictions on classes of and individual toxic chemicals in numerous product categories. It stated that: "All indoor residential carpet and rugs purchased by Lowe's will be free of PFAS chemicals by January 2020." The company also disclosed new restrictions on phthalates, halogenated flame retardants, vinyl chloride, triclosan, organotins, coal fly ash, and other toxic chemicals in other notable product categories, including wall-to-wall carpet, paint, and fiberglass insulation.

In November 2018, Lowe's launched a new safer chemicals policy, which states: "There has been a growing concern that there are hazardous chemicals that can be persistent and build up in the environment and have significant adverse human and environmental health effects. While regulations are being strengthened, certain concerns remain unregulated and may impact the health and safety of Lowe's products." It also states: "Lowe's will develop a framework to systematize the process of assessing chemicals and managing chemical risks. Chemical risks can be managed in several ways and may include requiring disclosure of chemicals in Lowe's products, reducing or eliminating toxic chemicals from Lowe's products or packaging, better educating consumers on product safety, and/or driving innovation by encouraging suppliers to transition to safer alternatives and green chemistry solutions." The policy references the company's products, packaging, and operations and applies to all its stores. The company notes that: "Lowe's will review this chemical policy at least on an annual basis and report progress in its annual corporate responsibility report."

In 2018, the company demonstrated impressive leadership by becoming the first major U.S.-based retailer to announce a global ban on the sale of paint strippers containing methylene chloride and NMP in all of its stores. This helped spur a major ripple effect among other large home improvement, paint, and big box retailers who joined the market shift away from toxic paint strippers. In 2015, Lowe's also adopted a policy to eliminate phthalates in its flooring by the end of 2015, making it the second-largest home improvement retailer in the country to adopt such a policy.

Opportunities for improvement: Lowe's should continue to implement its chemicals policy by expanding its beyond restricted substance list (BRS) across key product categories; setting public quantifiable goals with clear timelines for reducing and eliminating additional chemicals of high concern (CHCs); phasing out the use of any PFAS, ortho-phthalates, halogenated flame retardants, methylene chloride, and NMP that may be in other key product categories; and becoming a signatory to the Chemical Footprint Project and piloting it with key private label suppliers. The company should follow through on its ban of toxic paint strippers by also restricting regrettable substitutes, particularly those containing GreenScreen Benchmark 1 chemicals. Lowe's should also pilot the Health Product Declaration with suppliers.

KEY SOURCE: 2016 CSR report, available from <https://newsroom.lowes.com/news-releases/2016-csr-report/>



Macy's

Letter grade = **D+**

Total points = 32.75 out of 146.5

Macy's earned a letter grade of D+, which reflects a significant improvement from its F grade in 2018.

The company scored 32.75 out of 146.5 possible points, ranking 26th out of the 43 retailers evaluated this year.

Macy's, which also owns Bloomingdale's and Bluemercury, made significant progress this year by announcing the development of a safer chemicals policy and establishing a timeline for developing and implementing a restricted substance list (RSL) and manufacturing restricted substance list (MRSL). However, it is uncertain at this point if the RSL and MRSL will go beyond regulatory compliance. Macy's intends for the RSL to cover private-brand apparel, footwear, and home textiles by 2022 and non-apparel categories "beginning in 2024" and the MRSL will cover private-brand children's apparel/footwear and home textiles by 2023 and non-apparel product categories "beginning in 2025."

The company requires all private-label leather tanneries to be Leather Working Group-certified by 2021, and noted the progress in achieving that certification (currently 71%) and how the certification "requires a serious and continuous commitment to responsible consumption and elimination of hazardous chemicals by the tanning facility." The company notes that it has partnered with OEKO-TEX to sell some private-label sheets, bath towels, and rugs certified to "MADE IN GREEN by OEKO-TEX," or "STANDARD 100" which means that certain toxic chemicals are limited. In its most recent sustainability report, the company stated that by fall 2019, "all of Macy's moderately priced sheets will have been independently certified" as MADE IN GREEN, and in 2019, "Macy's will begin offering selected Women's and Men's apparel" that are certified to STANDARD 100.

In 2015, Macy's started to take some actions to address toxic chemicals in its products by committing to eliminate flame retardants in the furniture it sold, but it has not publicly discussed the status of this commitment since then.

Opportunities for improvement: Macy's can make progress by developing a strong public written safer chemicals policy, developing and enforcing a public beyond restricted substance list (BRSL) that clearly goes further than legal or regulatory requirements, and setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern (CHCs), especially any per- and polyfluoroalkyl substances (PFAS), toxic flame retardants, and phthalates that may be in the products it sells. The company should also adopt and implement strong accountability measures and disclosure requirements along with the safer chemicals policy. Macy's should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers. Finally, Macy's should report on the status of its commitment to eliminate toxic flame retardants in furniture.

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



McDonald's

Letter grade = **F**

Total points = 11 out of 146.5

McDonald's is still failing to publicly address key toxic indirect food additives that may be in food contact materials. With a letter grade of F, it scored 11 points out of 146.5 possible points, ranking 33rd out of the 43 retailers evaluated this year.

McDonald's received credit for achieving a complete phase-out of polystyrene in all food packaging. However, despite substantial public attention to toxic indirect food additives, including bisphenols, PFAS, and phthalates, there is no indication that McDonald's is taking any action to address these challenges. Recent testing has found that tested PVC gloves from two McDonald's restaurant locations contained ortho-phthalates. Although McDonald's has joined the NextGen Cup Challenge, partnering with Closed Loop Partners to design and commercialize a globally recyclable and/or compostable cup, there is no indication that this effort addresses chemical safety.

Opportunities for improvement: McDonald's can make progress by developing a public written safer chemicals policy covering toxic indirect food additives in food contact materials, covering at least bisphenols, per- and polyfluoroalkyl substances (PFAS) and phthalates, setting quantifiable goals with clear timelines, and eliminating and safely replacing any toxic indirect food additives that may be in food contact materials. McDonald's should also become a signatory to the Chemical Footprint Project.

NORDSTROM

Nordstrom

Letter grade = **F**

Total points = 13.5 out of 146.5

Nordstrom is still failing to publicly address toxic chemicals that may be in the products it sells.

With a letter grade of F and a score of 13.5 points out of 146.5, it tied for 30th place out of the 43 retailers evaluated this year.

While Nordstrom does not have a public written safer chemicals policy, the company received credit for adopting the American Apparel and Footwear Association (AAFA) restricted substance list (RSL), which goes beyond regulatory compliance and so effectively functions as a beyond restricted substance list (BRSL). The company also offers 50 brands of sustainable apparel products. These products comply with various sustainability standards, and some of these standards restrict chemicals of high concern (CHCs) as indicated on Nordstrom's website. However, this information is not easily accessible to the average consumer.

Opportunities for improvement: Nordstrom can make progress by developing a broader public written safer chemicals policy, expanding its BRSL to all apparel, developing and enforcing a public BRSL for other products, and setting public quantifiable goals with clear timelines for reducing and eliminating CHCs, especially any per- and polyfluoroalkyl substances (PFAS), toxic flame retardants, and phthalates that may be in products it sells. The company should provide customer-friendly information on which products and companies comply with various "sustainable style" standards that are free of toxic chemicals. Nordstrom should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.



Office Depot

Letter grade = **D**

Total points = 26.25 out of 146.5

Office Depot (which includes OfficeMax) earned a letter grade of D, which reflects an improvement from its F grade in 2018. The company scored 26.25 out of 146.5 possible points, ranking 28th out of the 43 retailers evaluated this year.

The improvement was driven primarily by posting a safer chemicals policy and having clear accountability standards for its suppliers to meet it. While expressing a commitment to “phase out chemicals of concern,” the policy does not provide a beyond restricted substance list (BRSL) or a manufacturing restricted substance list (MRSL), nor does it provide public goals or metrics on its impact.

Office Depot promotes “green” products and those with “reduced chemicals,” but offers no criteria, credible third-party certifications, or disclosures in order to justify such claims. While some products in these categories list specific, credible certifications, one has to read each product description on a product-by-product basis to determine this. 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, hinders the retailer’s performance.

Opportunities for improvement: Office Depot can make progress by presenting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern (CHCs), especially any per- and polyfluoroalkyl substances (PFAS), toxic flame retardants, and phthalates that may be in products it sells. The company should require 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 of Office Max.



Panera Bread

Letter grade = **D+**

Total points = 34.25 out of 146.5

Panera Bread is making progress in addressing key toxic indirect food additives that may be in food contact materials. Panera Bread earned a letter grade of D+, a significant improvement over its score of F in 2018. The company scored 34.25 out of 146.5 points, ranking 25th out of 43 retailers.

Panera Bread has established a safer chemicals policy that restricts substances in food packaging (and serves to prevent the introduction of these substances from the packaging into the food), that goes beyond regulatory compliance and includes PFAS, bisphenols, and phthalates. However, the company has not publicly disclosed its beyond restricted substance list (BRSL). The company has also moved from PVC gloves (which may contain phthalates) to polyethylene gloves (that are free of phthalates) for food handling, restricts chemicals of concern in cleaning products, and has started the process for switching one type of to-go packaging (baguette bags) to PFAS-free materials.

Opportunities for improvement: Panera Bread can make progress by fully disclosing its packaging BRSL and developing a comprehensive public written safer chemicals policy that ensures supplier compliance with the policy, sets quantifiable goals with clear timelines (beyond moving away from PFAS in baguette bags), and completely eliminates and safely replaces any toxic indirect food additives that may be in food contact materials. The company should disclose its efforts and progress in eliminating chemicals of high concern from food packaging, including any PFAS that may be in food packaging besides baguette bags. Panera should also become a signatory to the Chemical Footprint Project and pilot it with suppliers.



Publix

Letter grade = **F**

Total points = 0 out of 146.5

Publix is still failing to publicly address toxic indirect food additives that may be in food contact materials. With a letter grade of F, Publix was one of nine companies to score 0 out of 146.5 possible points, with no significant public-facing commitments to address the safety of indirect food additives that can be in food contact materials.

Despite substantial public attention to toxic indirect food additives, including bisphenols, PFAS, and phthalates, there is no indication that Publix is taking any action to address these challenges. Publix could receive credit for featuring the GreenWise line of food and non-food products from which certain chemicals are banned if the company can demonstrate it includes a ban on the use of these chemicals in food processing.

Opportunities for improvement: Publix can make progress by developing a public written safer chemicals policy, developing and enforcing a public beyond restricted substance list (BRSL), and setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern (CHCs). In particular, we urge the company to eliminate and safely replace toxic indirect food additives in food contact materials, with special attention to any bisphenols and per- and polyfluoroalkyl substances (PFAS) that may be in food packaging and food contact materials as well as any phthalates that may be in food and food contact materials in its supply chain. Publix should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.



Restaurant Brands International

Letter grade = **F**

Total points = 7.75 out of 146.5

Restaurant Brands International (RBI), including subsidiaries Tim Hortons, Burger King, and Popeyes, is still failing to publicly address key toxic indirect food additives that may be in food contact materials. With a letter grade of F and a score of 7.75 points out of 146.5, it ranked 34th out of the 43 retailers evaluated this year.

While RBI has no significant public-facing commitments to address the safety of indirect food additives that can be in food contact materials, the company does receive credit for restricting BPA in children's plastic toys and promotional cups, for having a multi-chemical BRSL (including 15 phthalates) for toys, and for testing to ensure compliance with the most stringent global regulation in all locations. However, recent testing has found that a tested PVC glove from a Burger King restaurant location contained ortho-phthalates.

Opportunities for improvement: RBI can make progress by developing a public written safer chemicals policy for toxic indirect food additives in food contact materials, addressing at least bisphenols (beyond BPA), per- and polyfluoroalkyl substances (PFAS) and additional phthalates, setting quantifiable goals with clear timelines, and eliminating and safely replacing any toxic indirect food additives that may be in food contact materials. RBI should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.



Rite Aid

Letter grade = **B+**

Total points = 85.5 out of 146.5

Rite Aid earned a letter grade of B+, the same letter grade that it achieved in 2018. The company scored 85.5 out of 146.5 possible points and ranked 5th out of the 43 retailers evaluated this year.

In 2017, Rite Aid disclosed to us that it was beginning to develop a safer chemicals program that included a beyond restricted substance list (BRS�) applying to several chemicals of high concern (CHCs) in its private-label products. Rite Aid's goal was to eliminate these CHCs from its formulated private-label products by 2020.

Rite Aid significantly improved its 2018 grade by adopting a new safer chemicals policy and a significantly expanded BRS� in September 2018, developing a range of accountability measures, reporting continued progress on eliminating CHCs from its products, and stating an explicit preference for ingredients on the EPA Safer Chemical Ingredients List. The company also disclosed plans for the near future to begin screening formulated products – both private-label and national-brand – for an expanded list of chemicals, to expand its policy to additional private-label formulated products, and to encourage suppliers to disclose ingredients to Rite Aid and to its customers (including fragrance ingredients).

In 2019, the company made even more progress by reporting additional metrics on progress toward meeting its goals and starting to screen national-brand products for chemicals on its expanded product BRS� and on the regulatory lists that comprise the Beauty and Personal Care (BPC) stewardship list. Additionally, Rite Aid has become a signatory to the Chemical Footprint Project and encourages its store brand suppliers to participate in 2020. The company is also developing a BRS� for food contact materials.

Opportunities for improvement: Rite Aid can make more progress by setting public quantifiable goals with clear timelines for reducing and eliminating all chemicals on its expanded RSL and on the six authoritative lists that make up the BPC stewardship list for both private-label and brand-name products and by prioritizing action on per- and polyfluoroalkyl substances (PFAS), toxic flame retardants, and all phthalates. Rite Aid can also improve by requiring suppliers to conduct alternatives assessments to avoid regrettable substitutions.

SALLY BEAUTY[®]

Sally Beauty

Letter grade = **F**

Total points = 0 out of 146.5

Sally Beauty is still failing to publicly address toxic chemicals that may be in the products it sells. With a letter grade of F, it was one of nine retailers out of 43 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.

This is the third year we have scored Sally Beauty and the company's third year earning zero points. Despite substantial public attention to chemicals of high concern (CHCs) in a number of cosmetic and beauty products and growing attention to the problem being paid by competitors, 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, developing and enforcing a public beyond restricted substance list (BRSL), and setting public quantifiable goals with clear timelines for reducing and eliminating CHCs, especially any per- and polyfluoroalkyl substances (PFAS) and phthalates that may be in the products it sells. Sally Beauty should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.

SEPHORA

Sephora

Letter grade = **B+**

Total points = 81 out of 146.5

Sephora earned a letter grade of B+, which reflects a significant improvement from its C grade in 2018 and D grade in 2017. The company scored 81 out of 146.5 possible points, ranking 7th out of the 43 retailers evaluated this year.

The improvement was driven by its July release of a new public-facing safer chemicals policy and associated beyond restricted substance list (BRS�). While Sephora has long maintained an extensive BRS� for its private-label products, the new policy applies to branded products it sells, with a commitment from the retailer to reduce the number of products it sells out of compliance with the BRS� by 50% in the next three years and with annual reporting of progress. This builds upon a voluntary program called “Clean at Sephora” which recognized branded products meeting a public BRS� which the retailer has also recently expanded. Together, its efforts represent a unique and positive effort among cosmetics retailers to start addressing chemicals of high concern (CHCs) in branded products.

Opportunities for improvement: Sephora can continue to work towards increasing transparency by making public the BRS� for its private-label products as well as disclosing ingredient information beyond that required by FDA rules, especially for fragrances. The company can increase the transparency of the ingredients of its private-label brands by disclosing the constituents of fragrances. The company should also expand the policy to target for elimination any per- and polyfluoroalkyl substances (PFAS) that may be in the private-label and brand-name products it sells. Sephora should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.



Sobeys

Letter grade = **F**

Total points = 0 out of 146.5

Sobeys is still failing to publicly address toxic chemicals that may be in the products it sells.

With a letter grade of F, it was one of nine retailers out of 43 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 toxic indirect food additives, including PFAS, phthalates, and bisphenols, there is no indication that Sobeys is taking any action to address these challenges. The company has committed to enhancing sustainability for packaging and materials through sourcing materials responsibly and assessing alternative materials and designs, but this does not appear to relate to avoiding chemicals of concern in product packaging.

Opportunities for improvement: Sobeys can make progress by developing a public written safer chemicals policy. The company should also develop and enforce a public beyond restricted substance list (BRSL) in key product categories, starting with its product lines Compliments and Sensations. Sobeys should set public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern (CHCs). The company can make progress by removing phthalates and triclosan that may be in personal care products and eliminating and safely replacing any BPA and per- and polyfluoroalkyl substances (PFAS) that may be in food packaging and food contact materials as well as any phthalates that may be in food and food contact materials in its supply chain. We also urge the company to remove all bisphenols including BPA and BPS from thermal paper receipts. Sobeys should become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers. Sobeys can also improve in the area of transparency by disclosing fragrance ingredients for private-label and brand-name products online and on product labels for cleaning and personal care products.

Note: Our assessment is primarily based on the policies and practices of Sobeys, not its parent company (Empire Company Limited).



Staples

Letter grade = **C**

Total points = 49.75 out of 146.5

Staples earned a letter grade of C, which is an improvement over its 2018 grade of D+. The company scored 49.75 out of 146.5 possible points and ranked 18th out of the 43 retailers evaluated this year.

Staples improved its score with its recent release of a public-facing chemicals policy, which includes a list of priority chemicals for the retailer and its suppliers to address. This list includes PFAS as a class, as well as a number of phthalates, flame retardants, methylene chloride, NMP, TCE, and bisphenols. The policy specifically references concerns about endocrine-disrupting chemicals, which are an important and often overlooked category of concern. In discussing safer alternatives, the retailer also notes the utilization of a hazard-based approach, superior to the more common risk-based methodology. The policy does not, however, have quantifiable goals for implementation.

Opportunities for improvement: Staples can make progress by setting clear requirements to enforce its beyond restricted substance list (BRS) and setting public quantifiable goals with clear timelines for reducing and eliminating any chemicals of high concern (CHCs). Staples should also follow up to its signing on to the Chemical Footprint Project by publicly releasing its total chemical footprint and a detailed plan to reduce it.



Starbucks

Letter grade = **F**

Total points = 0 out of 146.5

Starbucks is still failing to publicly address key toxic indirect food additives that may be in food contact materials. With a grade of F, it was one of nine retailers out of 43 in our review to score zero points with no significant public-facing commitments to address the safety of indirect food additives that can be in food contact materials.

Despite substantial public attention to toxic indirect food additives, including PFAS, phthalates, and bisphenols, there is no indication that Starbucks is taking any action to address these challenges. While a recent report found that Starbucks appears to be using polyethylene food-handling gloves, a safer alternative to PVC gloves, the company has not confirmed this is a company-wide policy. While Starbucks has joined the NextGen Cup Challenge, partnering with Closed Loop Partners to design and commercialize a globally recyclable and compostable cup, there is no indication that this effort addresses chemical safety.

Opportunities for improvement: Starbucks can make progress by developing a public written safer chemicals policy covering toxic indirect food additives that may be in food contact materials, covering at least bisphenols, per- and polyfluoroalkyl substances (PFAS) and phthalates, setting quantifiable goals with clear timelines, and eliminating and safely replacing any toxic indirect food additives that may be in food contact materials. Starbucks should also become a signatory to the Chemical Footprint Project.



Subway

Letter grade = **F**

Total points = 0 out of 146.5

Subway is still failing to publicly address key toxic indirect food additives that may be in food contact materials. With a grade of F, it was one of nine retailers out of 43 in our review to score zero points, with no significant public-facing commitments to address the safety of indirect food additives that can be in food contact materials.

Despite substantial public attention to BPA, phthalates, and PFAS in food packaging and phthalates in processing equipment, there is no indication that Subway is taking any action to address these challenges. While a recent report found that Subway appears to be using polyethylene food-handling gloves, a safer alternative to PVC gloves, the company has not confirmed this is a company-wide policy.

Opportunities for improvement: Subway can make progress by developing a public written safer chemicals policy covering toxic indirect food additives in food contact materials, covering at least bisphenols, per- and polyfluoroalkyl substances (PFAS) and phthalates, setting quantifiable goals with clear timelines, and eliminating and safely replacing any toxic indirect food additives that may be in food contact materials. Subway should also become a signatory to the Chemical Footprint Project.



Target

Letter grade = **A**

Total points = 102.5 out of 146.5

Target earned a letter grade of A, the same letter grade that it achieved in 2018. The company scored 102.5 out of 146.5 possible points, ranking 2nd out of the 43 retailers evaluated this year.

Target has continued to implement its chemicals policy in 2019, building on progress it has made over the past few years. In 2019, it launched a new wellness icon, “Clean,” to market and feature products free of key chemicals of high concern (CHCs). The company also launched a new line of household products free of CHCs, such as phthalates, though these products do not fully disclose their fragrance ingredients. The company recently disclosed progress in getting more suppliers to disclose ingredients to Target, and in fall 2019, released new guidance for suppliers in evaluating alternatives to chemicals of concern.

In 2018, the company developed a BRSI and MRSI for textiles (adopting the ZDHC MRSI) and guidance to suppliers for disclosing ingredients in formulated products, publicly disclosed the identity of chemicals that it was restricting in beauty and personal care products by CAS #, publicly reported on progress in removing chemicals of concern from beauty and personal care products, launched a new wellness icons program to make it easier for customers to identify products free of certain chemicals of concern, and funded and co-sponsored the Green Chemistry & Commerce Council’s (GC3) Preservatives Challenge to drive innovation in the preservatives category.

In 2017, Target first 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 expanding the policy to address other product categories and chemicals in manufacturing over time.

Last year, Target became a signatory to the Chemical Footprint Project (CFP) and more recently participated in the 2019 CFP survey.

Opportunities for improvement: Target can continue to improve its safer chemicals program by expanding the list of flame retardants and PFAS chemicals restricted in textiles, expanding the scope of textiles to include foam and infant/children’s car seats, and expanding the list of chemicals it is targeting for elimination in textiles and formulated household goods. As one of the largest grocery chains in America, Target should eliminate and safely replace any toxic indirect food additives that may be in food contact materials, with special attention paid to any bisphenols and per- and polyfluoroalkyl substances (PFAS) that may be in food packaging and other food contact materials as well as any phthalates that may be in food and food contact materials in its supply chain. Over time, the company should also expand its policy to address other chemically intensive product categories such as electronics, baby, and children’s products/toys.

KEY SOURCE: <https://corporate.target.com/article/2017/01/chemical-policy-and-goals>



TJX Companies

Letter grade = **F**

Total points = 0 out of 146.5

TJX Companies (the parent company of TJ Maxx, Marshalls, and HomeGoods) is still failing to publicly address toxic chemicals that can be in the products it sells. With a letter grade of F, it was one of nine retailers out of 43 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 requires audits of its suppliers' factories and TJX's supplier training program includes an overview of legal requirements on chemicals and hazardous materials as well as information on hazardous waste management, but these don't appear to go beyond regulatory compliance. TJX does not appear to have a beyond restricted substance list (BRSL) or otherwise require disclosure or elimination of chemicals of high concern (CHCs). This company reported moving away from BPA-containing receipt paper in its 2013 sustainability report, but testing released by Ecology Center in early 2018 found that the company was using the regrettable substitute of BPS in receipts.

Opportunities for improvement: TJX can make progress by developing a public written safer chemicals policy, developing and enforcing a public BRSL, and setting public quantifiable goals with clear timelines for reducing and eliminating CHCs, especially any per- and polyfluoroalkyl substances (PFAS), toxic flame retardants, and phthalates that may be in the products it sells. The switch from BPA to BPS in receipt paper highlights the need for a robust policy. The policy should also apply to its operations, especially since the cafeterias in one of TJX's headquarters have switched to using compostable plates that may be treated with PFAS (compostable plates are sometimes treated with PFAS). TJX can also expand its existing audit process to verify compliance with a future safer chemicals 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 = **D-**

Total points = 18 out of 146.5

Trader Joe's earned a letter grade of D-, which reflects an improvement from its F grade in 2018.

The company scored 18 out of 146.5 possible points, ranking 29th out of the 43 retailers evaluated this year.

In early December 2018, the company made a public commitment on per- and polyfluoroalkyl substances (PFAS) in food packaging. It followed up later that month with a list of additional chemicals it is asking vendors to avoid in its packaging, amounting to a beyond restricted substance list (BRS�). The additional chemicals are: bisphenol A (BPA) & bisphenol S (BPS); nonylphenol ethoxylates (NPEs); polystyrene (PS); styrene; and phthalates. The only progress that Trader Joe's has reported related to these chemicals since the December 2018 announcement was in July 2019, when the company stated that it replaced all styrofoam fresh meat trays with PET1 trays. While PET1 is generally considered safer than polystyrene, the company has not confirmed that these trays are free of all chemical additives of concern. The company also stated that it developed a sustainability framework based in part on "[a]voiding the use of harmful substances in packaging."

Previously, in an online announcement dated November 27, 2017, the company explained its actions on BPA in receipt paper and can linings and noted an ongoing effort to reformulate Health & Beauty and Household products without certain chemicals. However, these statements are too limited to amount to an official safer chemicals policy. In January 2018, Trader Joe's announced it would be moving to phenol-free receipt paper, and, in May of 2018, the company updated the November 2017 statement to notify the public that it would be rolling out non-phenol receipt paper in the next few months, but it has not reported on progress in this area since then.

Opportunities for improvement: Trader Joe's can make progress by developing a comprehensive public written safer chemicals policy, developing and enforcing a public BRS� that applies to products (e.g., personal care) in addition to packaging, and setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern (CHCs). In particular, we urge the company to strengthen its BRS� and act on it swiftly to eliminate and safely replace toxic indirect food additives in food contact materials, with special attention paid to ALL bisphenols and PFAS that may be in food packaging (especially as Trader Joe's moves to more compostable packaging, which studies show may contain PFAS) and other food contact materials as well as any phthalates that may be in food and food contact materials in its supply chain. The company should also confirm its progress on replacing phenol receipt paper with a safer substitute and confirm that the PET1 fresh meat trays are free from a broader list of chemical additives of concern than its packaging BRS�. Trader Joe's should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.



Ulta Beauty

Letter grade = **F**

Total points = 13.5 out of 146.5

Ulta Beauty is still failing to publicly address toxic chemicals that may be in the products it sells. With a letter grade of F and a score of 13.5 out of 146.5 possible points, it tied for 30th place out of the 43 retailers evaluated this year.

Ulta provides almost no public accountability or detail on its chemical safety programs, although it shared some detail with us on its practices. The retailer earned points for requiring the suppliers of its private-label products to eliminate chemicals of high concern (CHCs) 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. While Ulta 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 these 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 public the details of its safer chemicals policy and setting public quantifiable goals with clear timelines for reducing and eliminating CHCs. The company should also expand its RSL to target for elimination any per- and polyfluoroalkyl substances (PFAS) that may be in the private-label and brand-name products it sells. 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 otherwise increase its ingredient labelling to demonstrate a greater commitment to transparency. Ulta should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.



Walgreens

Letter grade = **B-**

Total points = 65.25 out of 146.5

Walgreens earned a letter grade of B-, the same letter grade that it achieved in 2018. The company scored 65.25 out of 146.5 possible points, ranking 11th out of the 43 retailers evaluated this year.

In 2018, Walgreens launched a new safer chemicals policy, including public quantifiable goals and a public beyond restricted substance list (BRSL). As an initial step, the policy applies largely to private-label products in the baby, beauty, personal care, and household cleaning categories. Walgreens has set a goal of eliminating all of the chemicals on its RSL in these products by the end of 2021. The company is also requiring private label suppliers to disclose all intentionally added ingredients, including fragrance components, to Walgreens. Suppliers are encouraged to look to EPA's Safer Chemical Ingredients List in finding safer alternatives, and they are encouraged to obtain third-party safer chemicals certifications for their products. More recently, the company shared that it will "list the ingredients in all owned brand household cleaners on their respective product labels by the end of 2019."

Opportunities for improvement: The company can improve by strengthening measures to ensure conformance with its safer chemicals policy, including conducting its own testing and requiring suppliers to test in third-party laboratories. The company should add per- and polyfluoroalkyl substances (PFAS) to the list of chemicals it is restricting in baby, beauty, personal care, and household cleaning products. Walgreens should also expand the scope of its policy to brand-name products and require suppliers to conduct alternatives assessments to avoid regrettable substitutions. 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 that are part of Walgreens Boots Alliance).

KEY SOURCE: https://www.walgreens.com/topic/sr/sr_product_integrity_home.jsp



Wal-Mart Stores

Letter grade = **A**

Total points = 98.25 out of 146.5

Wal-Mart Stores (Walmart and Sam's Club) earned a letter grade of A, which reflects an improvement from its letter grade of A- in 2018. The company scored 98.25 out of 146.5 possible points, ranking 3rd out of the 43 retailers evaluated this year.

Walmart has continued to implement and expand its chemicals policy in 2019, building on progress it has made over the past few years. In 2019, Walmart expanded the Sustainable Chemistry policy to target chemicals of concern in apparel, footwear, and soft home textile products for the first time. The company has set a goal: "to reduce the discharge of priority chemicals from the manufacturing process for apparel, footwear, and soft home textiles by 2025."

In 2018, Walmart announced it was phasing out the sale of methylene chloride- and NMP-based paint strippers in all of its stores in the United States, Canada, Mexico, and Central America and on walmart.com, becoming the fourth major retailer to take action on these harmful chemicals.

In 2017, the company made significant progress in both implementing and expanding its chemicals policy, which includes a greater focus on the larger list of 2,700 chemicals. This list grew by adding two new authoritative lists of fragrance chemicals of concern. Also in that year, 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 notable reduction of toxic chemicals given Walmart's size. Since 2014, Walmart has reduced the use of its "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 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 beyond 10% and expanding the policy to include key chemically intensive product categories, such as electronics, food, and furniture. As the largest grocery chain in America, Walmart should eliminate and safely replace any toxic indirect food additives that may be in food contact materials, with special attention paid to any bisphenols and per- and polyfluoroalkyl substances (PFAS) that may be in food packaging and other food contact materials as well as any phthalates that may be in food and food contact materials in its supply chain. The company should follow through on its ban of toxic paint strippers by also restricting regrettable substitutes, particularly those containing GreenScreen Benchmark 1 chemicals. The company should also expand its Sustainable Chemistry policy globally.

KEY SOURCE: <https://www.walmartsustainabilityhub.com/sustainable-chemistry>



Whole Foods Market

Letter grade = **B+**

Total points = 81.75 out of 146.5

Whole Foods Market earned a letter grade of B+, the same letter grade that it achieved in 2018. The company scored 81.75 out of 146.5 possible points, ranking 6th out of the 43 retailers evaluated this year.

In December 2018, after the 2018 report card was released, Whole Foods Market made an initial commitment on PFAS in food packaging by removing certain food packaging of which samples had tested positive for likely treatment with PFAS in testing commissioned by the Mind the Store campaign and Toxic-Free Future. So far in 2019, the company has prohibited octinoxate in body care products (including sunscreen), becoming the first national retailer to do so, and the company banned 15 PFAS ingredients in all body care products it sells. The company also reported in 2019 that its register tapes were phenol-free as of August 2019. Whole Foods Market also discussed its plans for a refresh of its household cleaning products standards in 2020; it is unclear if the tiered nature of the current standard, which has played an important role in encouraging suppliers to move to safer ingredients, will be maintained behind the scenes. In September 2019, the company stated that its goal “is to eliminate as many of the orange tiered ingredients as possible in all household cleaning products.”

In 2018, the company had stated that it would begin requiring on-pack disclosure of fragrance components in household cleaning products according to CA SB 258 by October 2019 in all states, but in September 2019 did not confirm that this was still the plan. Last year, Whole Foods Market confirmed the absence of benzophenone in its body care products, becoming the first national retailer to do so. The company also reported continued progress in moving away from BPA in packaging.

Whole Foods Market has several policies around chemicals – including the Eco-Scale rating system (as it is currently known), the first cleaning product standard of any retailer; Body Care Quality Standards; and protocols for chemicals related to packaging, such as PFAS in food packaging and BPA in can linings. According to information provided by staff in 2017, 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, as of 2017, banned 117 chemicals in all products in this category and 471 chemicals for Premium Body Care products. Whole Foods Market has expanded both lists of banned chemicals in body care products over time, to prohibit ingredients previously found in these products.

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 with clear timelines for the reduction and elimination of chemicals of high concern (CHCs). We hope Whole Foods Market will take the next step by becoming the first American grocery chain to make a public commitment to ban PFAS in all food contact materials while ensuring that substitutes are safe and disclose its timeline for doing so. Additionally, we urge the company to eliminate and safely replace other toxic indirect food additives that may be in food contact materials, with special attention paid to bisphenols that may be in food packaging and other food contact materials as well as any phthalates that may be in food and food contact materials in its supply chain. The company can also augment its practices for holding suppliers accountable to its policy. Whole Foods Market should require full disclosure of fragrance ingredients to itself and to the public on labels. The company should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.

KEY SOURCE: <http://www.wholefoodsmarket.com/quality-standards>



Yum! Brands

Letter grade = **F**

Total points = 0 out of 146.5

Yum! Brands, including subsidiaries KFC, Pizza Hut and Taco Bell, is still failing to publicly address key toxic indirect food additives that may be in food contact materials. With a letter grade of F, it was one of nine retailers out of 43 in our review to score zero points, with no significant public-facing commitments to address the safety of indirect food additives that can be in food contact materials.

Despite substantial public attention to BPA, phthalates, and PFAS in food packaging and phthalates in processing equipment, there is no indication that Yum! Brands is taking any action to address these challenges.

Opportunities for improvement: Yum! Brands can make progress by developing a public written safer chemicals policy covering toxic indirect food additives that may be in food contact materials, covering at least bisphenols, per- and polyfluoroalkyl substances (PFAS) and phthalates, setting public quantifiable goals with clear timelines, and eliminating and safely replacing any toxic indirect food additives that may be in food contact materials. Yum! Brands should also become a signatory to the Chemical Footprint Project.

Key Findings

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

- 1. PHASE-OUTS:** Several retailers are phasing out the use of PFAS, ortho-phthalates, bisphenols, and other classes of chemicals of concern in products and packaging.
- 2. FOOD PACKAGING:** For the first time, several major retailers publicly announced policies to restrict dangerous chemicals in food packaging, including PFAS and ortho-phthalates.
- 3. EXPANDED POLICY:** Retailers continue to adopt and expand corporate safer chemicals policies to require and encourage the transition to safer alternatives.
- 4. MOST IMPROVED:** During the past year, several retailers significantly improved the chemical safety of the products and packaging that they buy and sell.
- 5. RETAIL LAGGARDS:** One-third of major retail chains still lack even basic public commitments regarding the chemical safety of their products and packaging.

1.

PHASE-OUTS: Several retailers are phasing out the use of PFAS, ortho-phthalates, bisphenols, and other classes of chemicals of concern in products and packaging.

Retailers are joining the global trend to sidestep our broken governmental chemical safety system by phasing out structurally similar chemicals as a class, rather than laboring through a chemical-by-chemical assessment that can take decades to reach decisions. This approach is preferable to a response in which, as scientific evidence of hazards mounts for leading chemicals in a class, a company merely switches to using other chemicals in the same class. Those other chemicals often lack adequate safety data and may only be somewhat less dangerous, sharing the same hazard traits. This can lead to endless “regrettable substitution” in which the alternative chemicals in the same class end up raising similar concerns to those they replace.

PFAS – The ‘forever chemicals’ PFAS are a very large class of more than 4,700 chemicals with multiple carbon-fluorine bonds, the strongest in organic chemistry. They are widely used for their non-stick, grease-resistant, water-repellant, and stain-resistant properties. Many PFAS are extremely persistent, meaning they don’t readily break down in the environment. Scientists estimate some will likely persist in the environment for thousands of years. They’re also very mobile, meaning they can escape from products during manufacture, use, and disposal, and move far and wide through the air, groundwater, drinking water, and food supply. Some PFAS are very toxic

in very small doses, while most have been poorly studied. Virtually all humans on the planet have been exposed to PFAS, which can build up in the human body and wildlife.

Symptomatic of our broken chemical safety system, the U.S. Environmental Protection Agency and U.S. Food and Drug Administration have allowed some PFAS to be replaced by other PFAS, perpetuating the cycle of human exposure and environmental contamination.

Several retailers are rightly treating PFAS as a class and phasing out the entire group in major product or packaging categories. These include **The Home Depot** (in carpeting and rugs); **Lowe's** (in carpeting and rugs); **Ahold Delhaize** (in private-label food packaging); and **Staples** (in disposable foodware, furniture, and textiles).

ortho-Phthalates – These hormone-disrupting chemicals are commonly used to soften polyvinyl chloride (PVC) plastic and synthetic rubber, to carry fragrance in personal care products, or in adhesives, sealants and printing inks. Human exposure is widespread due to the widespread use of phthalates in food contact materials, building materials, home furnishings, and personal care products. Some in the chemical industry advocate replacing some ortho-phthalates with other ortho-phthalates even though they share similar hazards or have not been adequately studied, especially for endocrine activity.

Retailers who are newly publicly requiring suppliers to phase out the entire class of ortho-phthalates include **Ahold Delhaize** (in private-label food packaging), and **Lowe's** (in wall-to-wall carpeting). **Sephora** set a goal to reduce high priority chemicals by 50% over the next three years, which includes eight key ortho-phthalates. Other retailers, such as **Panera Bread**, have replaced vinyl gloves, which must be softened with phthalates or other plasticizer chemicals of concern, with safer alternatives such as polyethylene gloves that require no such chemical additives.

Bisphenols – The estrogen-mimicking chemical known as bisphenol A (or BPA) became notorious from its use in plastic baby bottles and sippy cups, and in the plastic lining of infant formula cans and baby food jars ... until outraged moms demanded the market switch to safer alternatives. BPA has also been widely used in thermal receipt paper, exposing cashiers and consumers to the hormone-disrupting chemicals. Some in the chemical industry encouraged a switch to bisphenol S or bisphenol F, which are structurally similar, thus potentially raising similar or possibly greater concerns. These chemicals are still used in some can linings for food and beverages, receipt paper, and plastics.

Several retailers are now joining others in treating several bisphenols as a class by prohibiting their intentional use, including **Ahold Delhaize** (in private-label food packaging) **Costco** (in thermal receipt paper in Canada), **Staples**, and **Whole Foods Market** (in thermal receipt paper).

Other Chemical Classes – Retail chains are also specifying other classes of chemicals of high concern (CHCs) for replacement with safer alternatives, include organohalogen flame retardants (OFRs), alkylphenol ethoxylates (APEs), and the related subclass nonylphenol ethoxylates (NPEs), formaldehyde-releasers, and parabens. These include **Staples** (restricting OFRs in furniture and textiles, NPEs in formulated products and textiles, formaldehyde releasers, and parabens in formulated products), **Lowe's** (restricting OFRs in fiberglass

insulation), **Sephora** (added numerous phthalates, parabens, and formaldehyde releasers to its list of High Priority Chemicals for brand-name suppliers), **Dollar General** (banning NPEs in beauty, personal care, and cleaning products) and **Canadian Tire** (brominated flame retardants have been prohibited in all products).

We applaud the move to a class-based approach while cautioning retailers that more work is needed to avoid regrettable substitution and ensure that the alternatives are truly benign by design. A recent example gives us pause. When paint strippers were reformulated to remove deadly methylene chloride and NMP, some were replaced with demonstrably safer alternatives. However, other replacement products contain other CHCs that score a Benchmark 1 on the GreenScreen for Safer Chemicals, which means they should be avoided. This is another symptom of our broken chemical safety system – government policy does not necessarily require truly safer alternatives.

2.

FOOD PACKAGING: For the first time, several major retailers publicly announced policies to restrict dangerous chemicals in food packaging, including PFAS and *ortho*-phthalates.

The U.S. Food and Drug Administration (FDA) allows the use of about 5,000 industrial chemicals in food packaging and food processing equipment, but very few have been assessed for safety based on modern science. Some of these chemicals, such as PFAS and phthalates, can migrate from the packaging and processing equipment into our food supply, exposing consumers and food workers and polluting the environment.

Several retailers are breaking new ground to improve the safety of food packaging. Market leadership announced by Whole Foods Market, Ahold Delhaize, Trader Joe's, Panera Bread, Albertsons, and Kroger will begin to close the gaps in the broken federal chemical safety system for food-contact materials.

- **Whole Foods Market** was the first North American grocery chain to publicly commit to remove PFAS from some food packaging, including take-out containers and deli/bakery paper.
- **Trader Joe's** asked its vendors to avoid PFAS in packaging for its products.
- **Ahold Delhaize** will restrict chemicals of concern, including PFAS, *ortho*-phthalates, and bisphenols, in its private-label products, including food packaging.
- **Rite Aid** will expand its safer chemicals policy to include food and beverage products and will develop a list of chemicals to restrict in food contact materials in 2020.
- **Albertsons** has begun to make progress in reducing the use of PFAS in food packaging for certain prepared foods and bakery goods such as cake plates.
- **Kroger** announced a timeline for completing its phase-out of BPA in the lining of its private-label canned goods, saying it will be complete by the end of 2020.
- **Panera Bread** restricted bisphenols, phthalates, and some fluorinated chemicals in take-out packaging and replaced PVC (vinyl) in food service gloves, which may contain phthalates or other plasticizers, with a safer alternative, polyethylene, that does not contain any plasticizers. All PFAS use in baguette bags will reportedly be phased out by 2020.

Similar actions by other food retailers are expected to follow in the coming year.

3.

EXPANDED POLICY: Retailers continue to adopt and expand corporate safer chemicals policies to require and encourage the transition to safer alternatives.

In the last year, sixteen retailers have adopted or substantially expanded corporate safer chemicals policies to promote safer chemistry in the packaging and products they sell.

New safer chemicals policies launched by retailers since last year's report card include these:

- **Ahold Delhaize** launched a safer chemicals policy to restrict chemicals in its private-label products and packaging and participate in the Chemical Footprint Project in 2020.
- **Dollar General** launched a safer chemicals policy to ban eight toxic chemicals in private-label beauty and household cleaning products by December 2022.
- **Lowe's** launched a safer chemicals policy and recently expanded it to ban PFAS in indoor residential carpets and rugs as well other chemicals of high concern in fiberglass insulation, paint, and wall-to-wall carpet.
- **Sephora** launched a safer chemicals policy that will apply its beyond restricted substance list (BRSL) to brand-name products.
- **Staples** launched a safer chemicals policy that addresses priority chemicals, such as PFAS, organohalogen flame retardants, bisphenols, and phthalates in textiles and other product categories.

During the past year, several retailers also expanded the reach of existing safer chemicals policies and/or demonstrated other new forms of leadership toward phasing out toxic chemicals:

- **Amazon** phased out methylene chloride and NMP from paint removal products and expanded its safer chemicals policy to the E.U.
- **Bed Bath & Beyond** will restrict a set of Priority Chemicals in private label baby personal care products.
- **Canadian Tire** phased out methylene chloride and NMP from paint strippers.
- **CVS Health** is phasing out two chemicals in private-label sunscreens by the end of 2019.
- **Dollar Tree** participated in Chemical Footprint Project survey in 2019.
- **The Home Depot** will ban new uses of PFAS in carpets and rugs by the end of 2019.
- **Rite Aid** will expand its safer chemicals policy to include food packaging in 2020 and is asking its suppliers of private-brand formulated products to participate in the Chemical Footprint Project.
- **Target** published guidance for suppliers to evaluate the safety of alternatives and avoid regrettable substitution and participated in the 2019 Chemical Footprint Project survey.
- **Walgreens** will disclose ingredients in all private-brand cleaners by the end of 2019.
- **Walmart** set a goal to remove toxic chemicals from apparel manufacturing by 2025.
- **Whole Foods Market** has restricted some PFAS chemicals in body care products and has banned some sunscreen chemicals and switched to phenol-free receipts.

4.

MOST IMPROVED: During the past year, several retailers significantly improved the chemical safety of the products and packaging that they buy and sell.

Of the 43 major retail chains we evaluated, seven stood out as most improved since 2018:

- **Ahold Delhaize** – The fourth-largest U.S. retail grocer and largest on the East Coast, Ahold Delhaize USA owns such popular grocery brands as Food Lion, Giant Food, Hannaford, and Stop & Shop. The company recently adopted a comprehensive commitment to sustainable chemistry that will prohibit the intentional use of several classes of toxic chemicals, including PFAS, ortho-phthalates, and bisphenols, in its private-label products and packaging. This marks one of the first retail commitments to end the use of dangerous chemicals in food packaging, improving Ahold Delhaize’s grade from an F in 2018 to a C- in 2019.
- **Bed Bath & Beyond** – Along with its subsidiary BuyBuy BABY, the company expanded its safer chemicals policy to restrict priority chemicals in personal care, cleaning, and cosmetics products. Bed Bath & Beyond also committed to reformulating its private-label baby products to remove certain CHCs. The company will end the use of flame retardant chemicals in certain padded products and reduce the use in other products. All of these changes in the last year significantly improved Bed Bath & Beyond’s grade to a C+ in 2019, up from a D+ last year.
- **Dollar General** – In 2019, this leading discount retailer adopted its first safer chemicals policy which applies to its private-label home cleaning, beauty, and personal care products. The policy includes a list of eight chemicals it is banning by December 2022: formaldehyde, toluene, triclosan, nonylphenol ethoxylates, butylparaben, propylparaben, trichloroethylene, and triclocarban. The company will also encourage national brand suppliers of products in these categories “to reduce or eliminate their use of the Chemicals in products sold to Dollar General.” Dollar General improved its grade from an F the last two years to a D in the 2019 Retailer Report Card, demonstrating a significant improvement.
- **Lowe’s** – Last year, Lowe’s also launched its first comprehensive safer chemicals policy, which pledges a systematic approach to disclosure of chemical use and reduction or elimination of chemicals of concern, with annual public reporting on its progress. In November 2019, Lowe’s expanded the policy to restrict PFAS in carpets and rugs, as well as other chemicals of high concern in flooring, insulation, and paints. Lowe’s improved its grade from a D+ last year to a B- in the 2019 Retailer Report Card, demonstrating continuous improvement from its first grade of D in 2016.
- **Panera Bread** – This market leader in fast-casual food service has restricted the use of dozens of toxic chemicals in its food packaging, including phthalates and bisphenols, and has begun to phase out all use of PFAS in grease-resistant coatings, starting with baguette bags. This year, for its food handling gloves, Panera replaced PVC (vinyl) plastic, which is full of chemical additives and has a highly toxic lifecycle, with a safer alternative, polyethylene plastic.
- **Sephora** – In 2019, this leading retailer of cosmetics launched its first safer chemicals policy and expanded its restrictions on the use of certain chemicals, beyond those legally mandated, to branded products it sells. Building on its voluntary Clean at Sephora program, the company has set a goal to reduce CHCs in brand-name formulated products by 50% over the next three years and to report on progress. Sephora earned a B+ in 2019, demonstrating steady improvement from its C grade in 2018 and its D from 2017.
- **Staples** – In 2019, this leading office supply retailer adopted its first public-facing safer chemicals policy. The company named a list of priority CHCs that it will ask suppliers to reduce. Demonstrating leadership among its competitors, Staples explicitly called out concern about endocrine-disrupting chemicals. Staples improved its grade to C from a D+ earned in 2018.

5.

RETAIL LAGGARDS: One-third of major retail chains still lack even basic public commitments regarding the chemical safety of their products and packaging.

This fourth annual Retailer Report Card has marked some dramatic progress in the retail sector in the last several years toward safer chemicals in products and packaging.

The average grade earned by all forty-three retailers was a C-, a slight gain from last year's D+ average. Overall, 63% of evaluated companies improved over the past year alone. The eleven retailers who have been graded every year for the last four years dramatically improved their average grade from a D+ in 2016 to a B- this year.

Despite this good news, some major retailers continue to fail to adequately address the growing scientific concern about exposure to toxic chemicals that can affect their customers' concerns, health, and well-being.

Fourteen retailers, more than 30% of the forty-three we evaluated, earned an F for failure to adopt even basic public safer chemicals policies or safer chemicals practices. This is still an overall improvement from 2018 when nineteen retailers, nearly half of those evaluated, scored an F grade.

Sally Beauty and TJX Companies lag behind the other evaluated retailers, having failed to score a single point in three consecutive years! Six other retailers failed to score a single point in the last two years. **The full 2019 retailer report card Toxic Hall of Shame includes:**

- **99 Cents Only** (F)
- **Ace Hardware** (F)
- **McDonald's** (F)
- **Metro** (F)
- **Nordstrom** (F)
- **Publix** (F)
- **Restaurant Brands International** (F) (includes Burger King, Tim Hortons, Popeyes)
- **Sally Beauty** (F)
- **Sobeys** (F)
- **Starbucks** (F)
- **Subway** (F)
- **TJX Companies** (F) (includes TJ Maxx, Marshalls, HomeSense, Sierra)
- **Ulta** (F)
- **Yum! Brands** (F) (includes Taco Bell, KFC, Pizza Hut, WingStreet)

Fortunately, when it comes to public safer chemical policies and practices, there are numerous other evaluated brands that scored substantially higher in nearly every retail sector occupied by these laggards.

The worst performing evaluated retail sector, which lags behind others in public chemical safety policies and practices, was **restaurants**, with an F grade average for the six evaluated retailers.

Conclusion & Recommendations



Retailers remain on the frontlines of consumer discontent with product safety and hazardous chemicals in everyday household products and food packaging. During the past year, more than a dozen of North America's largest retailers have taken significant steps to address harmful chemicals such as PFAS in products, packaging, and global supply chains, driving the development of safer solutions.

However, far too many U.S. retailers have failed to demonstrate meaningful progress on chemical safety, with 14 out of 43 retailers evaluated in this 2019 report card receiving failing grades.

The financial and regulatory risks that can be associated with toxic chemicals are substantial. Retailer reputation and customer loyalty are also in jeopardy, especially when the EPA and other agencies are 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 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 to protect the health of our families, communities, workers, and environment.

Recommendations

Based on our findings, we recommend that every major retailer in North America should:

- 1. POLICY:** Publish a written safer chemicals policy, with senior management-level engagement and accountability for suppliers, that measures and publicly reports on continuous improvement toward reducing, eliminating and safely substituting toxic chemicals in products, packaging, and global supply chains;
- 2. GOALS AND METRICS:** Set clear public goals with timelines and quantifiable metrics to measure success in eliminating both individual and classes of chemicals of high 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 including fragrance and other generic ingredients; public safer chemicals policies; and disclosure of both progress and challenges in eliminating harmful chemicals;
- 4. AVOID REGRETTABLE SUBSTITUTION:** Develop mechanisms to evaluate the hazards of alternatives to ensure informed substitution; and
- 5. FORESIGHT:** Anticipate being graded in the future on progress made on chemical safety in products and packaging sold at retail, whether or not your company was included in the Who's Minding the Store? 2019 retailer report card.

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](#), [Getting Ready for Baby campaign](#), and [Environmental Defence Canada's campaign for toxic-free products](#). This year's fourth-annual report card addresses the ongoing need for transformational change in the retail marketplace to promote safer chemicals in products, packaging, and global supply chains.

In 2019, *Who's Minding the Store?* evaluated the safer chemicals policies of 43 of North America's largest retailers: 99 Cents Only, Ace Hardware, Ahold Delhaize (Food Lion, Stop & Shop, Giant, and Hannaford), Albertsons, Aldi US, Amazon, Apple, Best Buy, buybuy BABY, Canadian Tire, Costco, CVS Health, Dollar General, Dollar Tree, The Home Depot, Ikea, Kohl's, Kroger, Loblaw, Lowe's, Macy's, McDonald's, Metro, Nordstrom, Office Depot, Panera Bread, Publix, Restaurant Brands International (Burger King, Popeyes, Tim Hortons), Rite Aid, Sally Beauty, Sephora, Sobeys, Staples, Starbucks, Subway, Target, TJX Companies, Trader Joe's, Ulta Beauty, Walgreens, Walmart Stores, Whole Foods Market, and Yum! Brands (KFC, Pizza Hut, Taco Bell).

These retailers were selected for evaluation because they [were among the top 43 U.S. or Canadian retailers by sales](#) or they commanded a major market share in one of twelve major retail sectors (see the sectors in the chart below).

New retailers evaluated in 2019: This year's report card includes two new retailers, for 43 companies in total. The new companies are two major retail chains based in Canada: Canadian Tire and Metro. They were added to continue to strengthen the geographic scope of the report card. We plan to continue to expand the report card to additional retailers in 2020.

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, Nordstrom, Target, TJX, Walmart
Baby/Children	99 Cents Only, Amazon, buybuy BABY (Bed Bath & Beyond), Costco, Dollar General, Dollar Tree, Target, Walmart
Beauty & Personal Care	99 Cents Only, Ahold Delhaize (Food Lion, Stop & Shop, Giant, and Hannaford), Albertsons, Aldi US, Amazon, Costco, CVS Health, Dollar General, Dollar Tree, Kohl's, Kroger, Loblaw, Macy's, Nordstrom, Publix, Rite Aid, Sally Beauty, Sephora, Sobeys, Target, Trader Joe's, Ulta, Walgreens, Walmart, Whole Foods Market
Department Store	Kohl's, Macy's, Nordstrom
Dollar Store	99 Cents Only, Dollar General, Dollar Tree
Drugstore	Ahold Delhaize, Albertsons, Amazon, Costco, CVS Health, Kroger, Loblaw, Metro, Publix, Rite Aid, Sobeys, 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, Canadian Tire, Costco, Ikea, Kohl's, Macy's, Target, TJX, Walmart, Target
Groceries	99 Cents Only, Ahold Delhaize (Food Lion, Stop & Shop, Giant, and Hannaford), Albertsons, Aldi US, Amazon, Costco, CVS Health, Dollar General, Dollar Tree, Kroger, Loblaw, Metro, Publix, Rite Aid, Sobeys, Target, Trader Joe's, Walgreens, Walmart, Whole Foods Market
Home Improvement	Ace Hardware, Amazon, Canadian Tire, The Home Depot, Lowe's
Office Supplies	Amazon, Office Depot, Staples
Restaurant / Fast Food	McDonald's, Panera Bread, Restaurant Brands International (Burger King, Popeyes, Tim Hortons), Starbucks, Subway, Yum! Brands (KFC, Pizza Hut, Taco Bell)

To evaluate retailers' safer chemicals policies and practices, we developed and applied a scoring rubric of 14 criteria (listed below). The rubric was first developed in 2016. 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](#). As in 2017 and 2018, this year we made some key changes to improve the glossary and criteria, especially for evaluating restaurant chains. You can read [a summary of improvements made to the criteria since 2018](#).

Each criterion was assigned a maximum number of points, ranging from 0 to 18 points, weighted based on our best professional judgment as to the criterion's importance to the goal of eliminating the use of harmful chemicals in consumer products and packaging. 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, the maximum score is 146.5 points. In 2019, we used the same curved letter grading system, going from F to A+, that was used in 2016 and 2017 (see the [grading table](#)).

We reviewed publicly available information reported by the retailers, including in corporate social responsibility or sustainability reports, websites, news releases and blog posts, in the summer of 2019. We also reviewed official correspondence between the 43 retailers selected for evaluation and the Mind the Store campaign, Campaign for Healthier Solutions, Getting Ready for Baby campaign, and Environmental Defence Canada. After an initial evaluation of the retailers, we sent each one its preliminary scores on all 14 criteria with a standardized email, providing every company an opportunity to review our findings, disclose additional information, and/or make new public commitments to correct or improve its draft score and grade. We followed up with each retailer multiple times to ensure that staff had received the preliminary grade and understood the report's deadline and process. If requested by a retailer's staff, we scheduled a phone call with the retailer to review and discuss our findings. After receiving written input, we adjusted and finalized each score based on any new information that was disclosed.

*** Of course, we can only grade retailers on the policies and practices that they publicly announce or that they disclosed to the authors in response to correspondence. We make no representations about policies or practices that retailers chose to keep confidential.

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 2019 report card
- [Factsheet](#) – Compare how the 43 evaluated retailers scored across 14 criteria (PDF download)
- [Scoring Rubric](#) – Learn about the fourteen criteria for the report (Excel file download)
- [Past Report Cards](#) – Download the *Who's Minding the Store?* retailer report cards from 2018–2016 (PDF download)
- [Grading Table](#) – Understand how we calculated the letter grades
- [Glossary](#) – Terms referenced in *Who's Minding the Store?*

Description of Actions Needed to Earn Maximum Points



Policy: Adopted a retailer safer chemicals policy (See Special Note on Food Products below)

17.5 points

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

- Sets public quantifiable goals for reducing and eliminating CHCs in the products and/or packaging the company sells;
- Applies to both products AND packaging;
- Applies to its entire operations, including facilities and in-house purchasing;
- Restrictions on chemicals apply to all locations where products are sold (whether or not the company has locations outside the U.S.);
- For at least one major product category, includes a beyond restricted substance list (BRS�) 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 (MRSL) (i.e. CHCs used to manufacture products but not present in the final product).

**Special note on food products: For the retail sale of food products, our evaluation is limited to chemical policies and practices regarding “indirect food additives,” which are the chemicals used in food contact materials (e.g. plastic, paper, metals, inks, adhesives, etc.) that may migrate from food packaging and other food contact articles (e.g. gloves, tubing, conveyor belts, etc.) into the food product. Indirect food additives do not include direct food additives (i.e. ingredients), pesticide residues or environmental contaminants. For example, food contact chemicals that are indirect food additives include per- and polyfluoroalkyl substances (PFAS), bisphenols (such as BPA and BPS), and ortho-phthalates. For additional examples, see the [Food Packaging Product Stewardship Considerations](#) published by the Food Safety Alliance for Packaging. For food products sold at retail, please keep in mind that when the words “product” and “packaging” are used throughout this rubric, that “packaging” refers to food packaging and that “product” only includes a food product when the presence of a food contact chemical in the food product may result from the use of food contact materials upstream in the supply chain (e.g. during food processing) or in the retail environment (e.g. during food preparation).*



Oversight: Established management responsibilities and incentives

5 points

The retailer engages its employees and managers in implementing its safer chemicals policy (beyond regulatory compliance) through both of the following practices:

- Assigned a member of senior management with responsibility for safer chemicals policy and
- Established financial incentives for senior management related to safer chemicals policies.

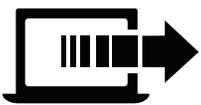


Accountability: Ensures supply chain accountability

12.5 points

The retailer engages in all of the four following practices to assess and ensure supplier conformance with retailer safer chemicals policy or RSLs:

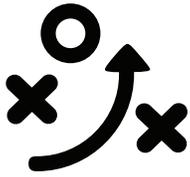
- Delineates requirements associated with safer chemicals policy and/or reporting in contracts with suppliers;
- Trains suppliers in safer chemicals policy and/or reporting requirements;
- Requires supplier(s) to conduct testing in third-party laboratories and provide results to assure conformance with safer chemicals policy; and
- Routinely tests parts, materials, or ingredients provided by suppliers to assure conformance with safer chemicals policy.



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

13 points

The retailer requires all private-label and brand-name suppliers to report to the retailer full chemical ingredient information for all formulated products and articles OR, for restaurant chains, to report to the retailer full chemical ingredient information for all packaging (see definition of full chemical ingredient information in [glossary](#)).



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

16 points

The retailer publicly reports on metrics in reducing and eliminating chemicals of high concern (CHCs) in the past three years (since November 2016) across multiple product or packaging categories. Metrics include quantifying (a) the reduction or elimination of CHC-containing products or packaging; (b) the products or packaging in which CHCs have been reduced or eliminated; or (c) the suppliers that are selling fewer products or packaging containing CHCs. Quantification can be by weight, number, or percent as appropriate.



Safer Alternatives: Evaluates safer alternatives, avoids regrettable substitutes

13.5 points

The retailer commissioned or required suppliers to conduct a credible hazard assessment, using detailed guidance, for alternatives to chemicals of high concern (CHCs) 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

18 points

Transparency around safer chemicals policy (7.5 points):

The retailer's safer chemicals policy and beyond restricted substance list (BRSL) (and manufacturing restricted substance list (MRSL), if applicable) are all publicly available.

Transparency around consumer ingredient disclosure (10.5 points):

The retailer formally requires all suppliers of formulated products and articles to publicly disclose, online and on product packaging (as applicable), full chemical ingredient information using industry naming standards rather than generic terms (e.g. for fragrance ingredients) (see definition of full chemical ingredient information in glossary).



Chemical Footprint: Evaluates its chemical footprint

7.5 points

The retailer engages in all of the three following practices:

- Completes the Chemical Footprint Project (CFP) survey,
- Makes CFP score and responses publicly available, and
- Is signatory to CFP.



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

8.5 points

The retailer requires certification to credible third-party safer chemicals standards (see [glossary](#) for examples) in every relevant category of retailer private-label products or packaging going beyond regulatory compliance.

Extra Credit



Joint Announcement: Public commitment demonstrated through joint announcement

5 points

The retailer participated in a joint public announcement in the last two years (since November 2017) with Mind the Store, Campaign for Healthier Solutions, the Getting Ready for Baby campaign, or Environmental Defence Canada.



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

15 points

The retailer has demonstrated significant improvement on a consistent basis over the long term in restricting chemicals of high concern (CHCs) going beyond regulatory compliance.



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

5 points

The retailer thoroughly implemented a program to feature and market

- (i) safer products on store shelves and/or website, or
- (ii) safer packaging used in stores.



Collaboration: Actively participates in collaborative process to promote safer chemicals

5 points

The retailer engages in one of the following three activities:

- Actively participates in a collaborative process to promote safer chemicals (see glossary for examples),
- Retains an independent expert institution (not a consulting firm) to assist in meeting the same goal, 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

The retailer or retailer's foundation invests significant financial resources into independent research into safer alternatives to chemicals of high concern (CHCs) and/or green chemistry solutions.

*** Of course, we can only grade retailers on the policies and practices that they publicly announce or that they disclosed to the authors in response to correspondence. We make no representations about policies or practices that retailers chose to keep confidential.

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 the *Who's Minding the Store?* Retailer Report Card. 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, OEKO-TEX, and Safer Choice (formerly known as Design for the Environment).

Disclosure: for purposes of rubric category 7, Transparency, this term 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. For purposes of rubric category 4, this term means that information was transmitted from supplier(s) to the retailer.

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.](#)

Last three years: For purposes of rubric category 5, Action, retailers' efforts in reducing or eliminating chemicals of high concern will only count toward their grade if the action was taken since November 2015.

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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