

2018

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 third annual evaluation of the safer chemicals programs of forty of the largest retailers in the United States.

The report card was published in November 2018 by the [Mind the Store campaign](#) of [Safer Chemicals, Healthy Families](#).

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Partners

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Who's Minding the Store?

A report card on retailer actions to eliminate toxic chemicals

Executive Summary

As concern about toxic chemicals grows among consumers and doctors alike, **major retailers are making slow but meaningful progress in improving the safety of the products and packaging they sell but nearly half of those scored have failed to make the grade.** In this third annual *Who's Minding the Store?* Retailer Report Card, Safer Chemicals, Healthy Families graded the chemical policies and practices of forty major retailers that sell products in North America, as part of its Mind the Store campaign.

Four retailers received the highest grades for their work to protect customers from toxic products and packaging: Apple (A+), Target (A), Walmart (A-) and IKEA (A-). Top-ranked performers continually work with suppliers to disclose and replace dangerous chemicals with safer alternatives.

Average grades show steady improvement over time. Eleven retailers improved their average grade from a D+ to a C+ since the first report card was published in 2016. Another eighteen retailers bumped up their grade from D to a D+ over the past year, on average. Twenty-one out of the twenty-nine retailers (72%) that were evaluated in both 2017 and 2018 improved their score over the last year.



Rank	Grade	Point	Leading Retailers
#1	A+	106.25	Apple
#2	A	95.5	Target
#3	A-	93.75	Walmart
#4	A-	87.75	IKEA
#5	B+	83.75	Whole Foods Market
#6	B+	82.5	CVS Health
#7	B+	81.5	Rite Aid
#8	B-	70.5	Walgreens
#9 (tied)	B-	63	The Home Depot
#9 (tied)	B-	63	Aldi

Many retailers are taking action to reduce or eliminate chemicals of high concern in consumer products. For example, **Lowe's** led a recent wave of commitments by ten major retailers to end the sale of paint stripping products containing the deadly chemicals methylene chloride and NMP.

Walgreens, Rite Aid and Amazon are the most improved retailers of 2018, each adopting sweeping chemicals policies. Walgreens (B-) and Rite Aid (B+) pledged to eliminate a long list of chemicals of concern in beauty, personal care and household cleaning products. Amazon (C) will encourage suppliers of some private-brand products to restrict dangerous chemicals, the first safer chemical policy of a dedicated e-commerce retailer.

In other documented trends, retailers are working to replace entire classes of toxic chemicals with safer alternatives, rather than chasing one chemical at a time. For example, several are phasing out phthalates, parabens, formaldehyde-donors, and nonylphenol ethoxylates as chemical classes. Increasingly, retailers are screening products against long lists of dangerous chemicals, such as the “stewardship list” chemicals in the new BPC Product Sustainability Rating System.

Rank	Grade	Points	Lagging Retailers
#23 (tied)	F	13	Macy's
#23 (tied)	F	13	Ulta Beauty
#25	F	11.5	Ahold Delhaize
#26	F	11	Nordstrom
#27	F	9.5	Trader Joe's
#28	F	8.5	Panera Bread
#29	F	5.5	Office Depot
#30 (tied)	F	0	99 Cents Only
#30 (tied)	F	0	Ace Hardware
#30 (tied)	F	0	Dollar General
#30 (tied)	F	0	McDonald's
#30 (tied)	F	0	Publix
#30 (tied)	F	0	Restaurant Brands International
#30 (tied)	F	0	Sally Beauty
#30 (tied)	F	0	Sobeys
#30 (tied)	F	0	Starbucks
#30 (tied)	F	0	Subway
#30 (tied)	F	0	TJX Compaines
#30 (tied)	F	0	Yum! Brands

However, nearly half the retailers scored were slapped with an F grade for failure to adopt even the most basic policies and practices to ensure the chemical safety of their products and packaging. Restaurants (average grade of F) are by far the worst performing sector, although **Panera Bread** scored some points for restricting chemicals in its packaging. Other retail sectors with poor performance include dollar stores (F), department stores (F), beauty shops (D-) and office supplies (D-).

Safer Chemicals, Healthy Families urges all retailers to adopt comprehensive safer chemicals policies, fully disclose the ingredients of their products and packaging, and substitute hazardous chemicals with safer solutions. Safer Chemicals, Healthy Families calls on consumers to join its Mind the Store campaign and press retailers where they shop to clean up their act. **It's time for all retailers to put our families' health above the special interests of chemical corporations.**

Introduction

Our homes, schools, and workplaces are filled with toxic chemicals that have been proven to have dangerous health effects. These health effects are so widespread that many doctors and scientists refer to this as a “silent epidemic.”

Studies show that more than 90% of American women of childbearing age have toxic chemicals in their bodies that will increase the risk of cancer, reproductive harm, brain damage and loss of intelligence in their babies.



Many of the toxic chemicals that endanger our families are where we least expect them – such as our clothing, electronics and food.

Every year exposure to toxic chemicals costs the U.S. more than 130 billion dollars in health care, social services, special education, and lost productivity.

Just as we are learning more about how many toxic chemicals our families are exposed to, the federal government is rolling back regulation of those products and putting the chemical industry in charge of government programs that are supposed to protect us from chemicals.

It's time for a change.

We can prevent harm and protect public health by taking common-sense steps to phase out toxic chemicals in everyday products.

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

In 2013 Safer Chemicals, Healthy Families launched the [Mind the Store campaign](#) to challenge the nation's biggest retailers to sell safer products that are free from toxic chemicals that threaten public health and the environment.

We have reason for hope. Since we launched the campaign five years ago, we've seen an incredible amount of activity in the retail marketplace to drive chemicals of concern out of commerce and develop more comprehensive solutions. Over the past year alone, we've seen numerous retailers, such as Lowe's, The Home Depot, and Walmart drive toxic chemicals out of paint removal products, and others, such as Walgreens, Rite Aid, and Amazon, step up by developing safer chemicals policies.

Over the past few years, our report *Who's Minding the Store? – A Report Card on Retailer Actions to Eliminate Toxic Chemicals* set out to evaluate the progress that has been made and challenges that remain in the retail marketplace. It is the third annual evaluation of the safer chemicals programs of the nation's largest retailers in the United States and comes just in time for the holiday shopping season.

To evaluate the progress made since last year, as well as the continued need for market transformation, we have updated and expanded our report card. This year we expanded the report card to add a dozen new retailers – forty in total. For the first time we've included restaurant and fast food chains, which have an important role to play in protecting consumers from toxic chemicals such as phthalates and PFAS. We also expanded the geographic scope by including some stores based in Canada.

Our investigation found that a number of retailers have continued to make significant progress over the past year but far too many remain serious laggards. Nineteen out of forty companies we evaluated received failing grades. The nation's biggest retailers must continue to expand and accelerate their policies and programs, given the mounting amount of scientific evidence demonstrating the urgent public health crisis posed by hazardous chemicals.

It's time for leading retailers to “mind the store” and meet the rising consumer demand for safe and healthy products. The health of our families demands it.

Retailer Rankings










In the third annual report card on toxic chemicals in consumer products, the Mind the Store campaign evaluated forty of the largest retailers in North America. We found that major retailers are making slow but meaningful progress in improving the chemical safety of the products and packaging they sell, but nearly half have failed to make the grade.

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

- See the chart on the following pages to compare how the 40 retailers scored across the 14 categories in the rubric.
- See pages 15-55 for a description of how each retailer scored.










How retailers rank on tackling toxic chemicals

EXTRA CREDIT

	175 Pts.	75 Pts.	75 Pts.	10 Pts.	10 Pts.	15 Pts.	15 Pts.	7.5 Pts.	7.5 Pts.	7.5 Pts.	10 Pts.	15 Pts.	15 Pts.	5 Pts.	5 Pts.	5 Pts.	5 Pts.	Final Score
	Policy	Oversight	Accountability	Disclosure	Action	Safer Alternatives	Transparency	Chemical Footprint	Third-party Standards	Joint Announcement	Continuous Improvement	Safer Products	Collaboration	Impact Investment				
 99 Cents Only	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 Pts. F
 Ace Hardware	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 Pts. F
 Ahold Delhaize	2.5	2.5	0	0	0	0	1.5	0	0	0	0	5	0	0	0	0	0	11.5 Pts. F
 Albertsons	7.5	2.5	2.5	0	6	2	7.75	0	4.5	0	5	5	2.5	0	0	0	0	45.25 Pts. C-
 Aldi	15	2.5	7.5	0	15	1	7.5	0	4.5	0	5	0	5	0	0	0	0	63 Pts. B-
 Amazon	5	3.75	2.5	2.5	3	2	9	0	3	1	10	5	5	0	0	0	0	51.75 Pts. C
 Apple	16.25	7.5	10	7.5	13.5	10	9	0	7.5	0	15	0	5	5	0	0	0	106.25 Pts. A+
 Best Buy	13.75	7.5	7.5	2.5	3	2	5	0	3	0	0	5	5	0	0	0	0	54.25 Pts. C
 Buy Buy Baby	7.5	2.5	5	5	0	1	9	0	1.5	0	5	0	0	0	0	0	0	36.5 Pts. D+










How retailers rank on tackling toxic chemicals

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	17.5 PTS.	10 PTS.	10 PTS.	10 PTS.	15 PTS.	15 PTS.	10 PTS.	15 PTS.	7.5 PTS.	7.5 PTS.	7.5 PTS.	7.5 PTS.	15 PTS.	5 PTS.	5 PTS.	5 PTS.	5 PTS.	52.75 PTS. C
	Policy	Oversight	Accountability	Disclosure	Action	Safer Alternatives	Transparency	Chemical Footprint	Third-party Standards	Joint Announcement	Continuous Improvement	Safer Products	Collaboration	Impact Investment				Final Score
 Costco	10	2.5	7.5	0	3	4	7.75	0	3	0	10	0	5	0	5	0	0	52.75 PTS. C
 CVS Health	7.5	7.5	5	6	15	6	9	1.5	0	5	10	5	5	0				82.5 PTS. B+
 Dollar General	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 PTS. F
 Dollar Tree	7.5	1	2.5	2.5	0	0	9	0	0	0	5	0	0	0	0	0	0	27.5 PTS. D
 The Home Depot	10	2.5	2.5	0	12	2	8.5	0	3	2.5	10	5	5	0				63 PTS. B-
 Ikea	15	6.25	10	5	12	8	6.5	0	0	0	15	0	5	5				87.75 PTS. A-
 KOHL'S Kohl's	10	2.5	6.25	0	0	1	5	0	0	0	5	0	0	0	0	0	0	29.75 PTS. D
 Kroger	1.25	2.5	2.5	0	12	1	1.5	0	1.5	0	10	2.5	0	0	0	0	0	34.75 PTS. D+
 Loblaw	12.5	5	5	2.5	12	0	7.5	0	0	2.5	0	0	5	0	0	0	0	52 PTS. C





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	17.5 PTS.	7.5 PTS.	10 PTS.	10 PTS.	15 PTS.	10 PTS.	15 PTS.	7.5 PTS.	7.5 PTS.	7.5 PTS.	15 PTS.	5 PTS.	5 PTS.	5 PTS.	5 PTS.	Final Score
	Policy	Oversight	Accountability	Disclosure	Action	Safer Alternatives	Transparency	Chemical Footprint	Third-party Standards	Joint Announcement	Continuous Improvement	Safer Products	Collaboration	Impact Investment		
 Lowe's	0	2.5	2.5	0	12	0	0	0	1.5	2.5	10	0	5	0	36 PTS. D+	
 Macy's	0	0	0	0	0	0	1.5	0	1.5	0	5	5	0	0	13 PTS. F	
 McDonald's	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 PTS. F	
 Nordstrom	2.5	0	2.5	0	0	1	5	0	0	0	0	0	0	0	11 PTS. F	
 Office Depot	0	0	0	0	0	0	0	0	3	0	0	2.5	0	0	5.5 PTS. F	
 Panera Bread	5	2.5	0	0	0	1	0	0	0	0	0	0	0	0	8.5 PTS. F	
 Publix	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 PTS. F	
 Restaurant Brands International	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 PTS. F	
 Rite Aid	10	5	7.5	6.5	15	2	10.5	0	0	5	10	5	5	0	81.5 PTS. B+	






How retailers rank on tackling toxic chemicals

EXTRA CREDIT

	17.5 PTS.	10 PTS.	10 PTS.	7.5 PTS.	7.5 PTS.	10 PTS.	15 PTS.	15 PTS.	7.5 PTS.	7.5 PTS.	15 PTS.	5 PTS.	5 PTS.	5 PTS.	5 PTS.	5 PTS.	5 PTS.	5 PTS.	5 PTS.	Final Score	
	Policy	Oversight	Accountability	Disclosure	Action	Safer Alternatives	Transparency	Chemical Footprint	Third-party Standards	Joint Announcement	Continuous Improvement	Safer Products	Collaboration	Impact Investment							
SALLY BEAUTY Sally Beauty	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 PTS. F
 Sephora	10	2.5	7.5	7.5	3	0	4	0.75	0	0	5	5	5	0	0	0	0	0	0	0	50.25 PTS. C
 Sobeys	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 PTS. F
STAPLES Staples	0	2.5	2.5	5	6	2	2.5	1.5	3	0	0	5	5	2.5							37.5 PTS. D+
 Starbucks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 PTS. F
 Subway	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 PTS. F
 Target	15	7.5	5	7.5	15	4	9	1.5	6	0	10	5	5	5							95.5 PTS. A
TJX TJX Companies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 PTS. F
TRADER JOE'S Trader Joe's	0	0	0	0	3	0	1.5	0	0	0	5	0	0	0	0	0	0	0	0	0	9.5 PTS. F

How retailers rank on tackling toxic chemicals

EXTRA CREDIT

	17.5 pts	7.5 pts	10 pts	10 pts	15 pts	10 pts	15 pts	7.5 pts	7.5 pts	7.5 pts	15 pts	5 pts	5 pts	5 pts	5 pts	5 pts	Final Score
	Policy	Oversight	Accountability	Disclosure	Action	Safer Alternatives	Transparency	Chemical Footprint	Third-party Standards	Joint Announcement	Continuous Improvement	Safer Products	Collaboration	Impact Investment			
 Ulta Beauty	5	2.5	0	0	3	1	1.5	0	0	0	0	0	0	0	0	0	13 PTS. F
 Walgreens	10	5	2.5	6.5	6	2	10.5	0	3	5	10	5	5	0	0	0	70.5 PTS. B-
 Walmart	11.25	2.5	2.5	7.5	15	6	14	6	5.5	2.5	10	1	5	5	5	5	93.75 PTS. A-
 Whole Foods	10	2.5	6.25	6	15	6	12	0	6	0	15	5	0	0	0	0	83.75 PTS. B+
 Yumi Brands	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0 PTS. F



99 Cents Only

Letter grade = **F**

Total points = 0 out of 135

99 Cents Only Stores is failing to publicly address toxic chemicals in the products it sells. With a letter grade of F, it was one of twelve retailers (out of 40) in our review to score zero points with no meaningful public-facing commitments to address the safety of chemicals used in the products it sells. 99 Cents Only Stores has stated 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 or otherwise require disclosure or elimination of chemicals of high concern.

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. 99 Cents Only Stores 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 = 0 out of 135

Ace Hardware is failing to publicly address toxic chemicals in the products it sells. With a letter grade of F, it was one of twelve retailers (out of 40) in our review to score zero points with no significant public facing commitments to address the safety of chemicals used in the products it sells or in its private brands. This is the second year that Ace Hardware has been included in the Retailer Report Card, and its second year of earning an F. It has shown no public signs of responding to consumer demand for safer chemicals policies.

As a retail cooperative, most Ace stores are independently owned and operated and have some flexibility in determining what they stock and market. However, the Ace Hardware company is responsible for selecting private-label products and can greatly influence what is marketed at its member stores. While some local Ace stores have made progress in promoting safer products, leadership is clearly needed from the company to commit to addressing chemicals of high concern and identifying and promoting safer alternatives.

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



Ahold Delhaize

Letter grade = **F**

Total points = 11.5 out of 135

Ahold Delhaize, the parent company of many familiar supermarket chains, including Food Lion, Stop & Shop, Giant, and Hannaford, has failed to publicly address toxic chemicals in the products it sells. With a letter grade of F and a score of 11.5, it ranks 25th out of 40 retailers scored. It has only minimal public-facing commitments to address the safety of chemicals used in the products it sells or in its private brands. This is the second year that Ahold Delhaize has been included in the Retailer Report Card and its second year earning an F. This is in sharp contrast to other environmental and social responsibility concerns where Ahold Delhaize has well documented commitments and policies, including publicly reported metrics and clear pathways of executive oversight.

In responding to our draft assessment, the retailer suggested that we should award more points for having a policy to address certain chemicals in its “natural” or “organic” lines of private-label products. Other than for marketing safer chemicals, we have awarded a small number of points for this initiative. While many retailers sell safer products in addition to those containing chemicals of concern, the purpose of a safer chemicals policy should be to ensure that all products within a category or those with a formulation under direct control of the retailer are meeting the standard. Based on the information provided to us, Ahold Delhaize has created a private-label brand that has restrictions on chemical content, but it is not applying this to all private-label products or all products within a category, and therefore has not actually created a safer chemicals policy.

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

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



Albertsons

Letter grade = **C-**

Total points = 45.25 out of 135

Albertsons Companies scored 45.25 out of 135 possible points, earning a C-, the same letter grade that it achieved in 2017, and ranking 16th place among 40 retailers. In 2017, Albertsons developed a public Chemical Policy, which states the company is “committed to quality products, product safety, environmental stewardship and sound chemical management, including limiting the use of certain ingredients of consumer concern.” It also states: “We strive for greater transparency and work with our supplier community to maintain and continually improve brand-specific guidelines for our products.” The policy described some of the company’s initiatives around chemicals of concern. Since announcing the company’s chemical policy last year, it eliminated BPA from all self-manufactured beverage cans in its OWN Brands portfolio of products. The company maintains a Beyond Restricted Substance List (BRSL) for its Open Nature private-label line of products, certifies a number of private-label products to EPA Safer Choice, has set restrictions on BPA in packaging, and on parabens, phthalates, and triclosan in its private-label baby products. The company has also launched a Sustainability Council to address environmental and social issues that are important to the company and its stakeholders, including chemical management.

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

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



Aldi

Letter grade = **B-**

Total points = 63 out of 135

Aldi US earned a B-, scoring 63 points out of 135 and tying for 9th place among the 40 retailers evaluated. Aldi US has not adopted a comprehensive chemicals policy that encompasses all the products it sells, including food, food packaging, and food contact materials. Therefore, Aldi has no public written safer chemicals policy on PFAS, BPA, or ortho-phthalates in the food supply chain. However, the company has made significant progress in addressing chemicals in garments, household textiles, and footwear. The company made a commitment to achieve 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 an M-RSL/RSL that applies to apparel, household textiles, and footwear, and set quantifiable goals for reducing eleven groups of chemicals of concern in these product categories. Aldi conducts trainings for suppliers and requires OEKO-TEX certification for textiles, which involves testing by third-party approved laboratories.

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 food, food packaging, and 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 chemicals of high concern in all products, and completely eliminating and safely replacing BPA and per- and polyfluoroalkyl substances (PFAS) in food packaging and food contact materials as well as phthalates in 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 = 51.75 out of 135

Amazon earned a grade of C, which reflects a significant improvement from its D grade in 2017 and F grade in 2016, scoring 51.75 out of 135 possible points and ranking 14th in overall points scored among 40 retailers. The company has made significant progress over the past year by developing a new chemicals policy, which includes a Restricted Substance List (RSL) 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 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.” 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 2 Cradle as examples of third-party standards it is focused on.

Opportunities for improvement: Amazon should set clear public timelines for reducing, eliminating, and safely replacing chemicals on its new Restricted Substance List and should publicly report on metrics in implementing it annually. In 2019, Amazon should expand its chemicals policy to other chemically intensive private-label product categories, particularly electronics, apparel, and food, and establish goals and timelines to restrict toxic flame retardants, phthalates, and PFAS chemicals in these products, packaging, food service ware, and supply chains. The company should also expand the policy to restrict highly hazardous chemicals in brand-name products sold on Amazon.com, beginning with methylene chloride and NMP in paint and coating removal products. The company should also expand the scope of its RSL for private-brand formulated products to apply to the same categories of brand-name products sold on Amazon.com. 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. For purposes of this 2018 report card, Whole Foods Markets has been scored and graded as a separate company, given that the two company’s chemicals policies are significantly different.



Apple

Letter grade = **A+**

Total points = 106.25 out of 135

Apple improved on its grade of A from last year, scoring an A+ with 106.25 points out of 135 points this year. Apple ranked first out of 40 retailers. Apple has made impressive strides in this area, not only maintaining and frequently updating a Beyond Restricted Substance List (Apple’s Regulated Substances Specification or RSS) but also aiming for full material disclosure of its private-label products to analyze every component in the products it sells, with more than 25,000 out of 50,000 reviewed so far. 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.

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, and 2017. 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. This company has also created its own Green Chemistry Advisory Board and collaborated with outside groups on safer chemicals and eliminating toxins.

Opportunities for improvement: Apple can make even more progress by setting transparent public, quantifiable goals with specific timelines for reducing and eliminating chemicals of concern and expanding its Full Material Disclosure initiative to brand name products sold in Apple stores and on Apple.com. The company should also report how it is ensuring that the molded fiber packaging materials the company is increasingly utilizing are not treated with PFAS. 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 = 54.25 out of 135

Best Buy earned a C grade by scoring 54.25 out of 135 possible points this year, which is a decrease from its grade last year of a B and reflects a lack of significant forward momentum in 2018. Best Buy ranks 11th out of 40 retailers this year. In 2017, the company had made great strides compared with 2016 by releasing its new Chemicals Management (Corporate) Statement. This document describes Best Buy's plans to phase out chemicals of concern and improve chemicals management. The policy applies to operations and manufacturing processes, and references a Restricted Substances List (RSL) and Manufacturing Restricted Substances List (MRSL). However, Best Buy has still not disclosed the content of either the RSL or MRSL and did not report any progress in 2018 on reducing chemicals of concern. Best Buy did report on an initial piloting of its chemicals policy with store-brand TV suppliers in its 2018 CSR report, and the company stated it looks forward "to expanding the program to other product categories."

Additionally, the company sells and promotes EPEAT-certified products that are free of certain hazardous chemicals. Best Buy remains active in the Green Chemistry & Commerce Council's Retailer Leadership Council 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 content of its RSL and MRSL, both of which it pledged in 2016 to release in 2017 but so far has not. The company should prioritize the reduction and elimination of halogenated flame retardants in key electronics, such as televisions, and substitute them with safer alternatives in the year ahead. Best Buy can also expand the policy to cover packaging and include quantifiable goals for reduction or elimination of chemicals of concern, strengthen oversight of the policy by senior management, and become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.

KEY SOURCE: <https://corporate.bestbuy.com/wp-content/uploads/2018/06/FY18-full-report-FINAL.pdf>



Buy Buy Baby

Letter grade = **D+**

Total points = 36.5 out of 135

Bed Bath & Beyond and its subsidiary buybuy BABY earned a letter grade of D+, scoring 36.5 points out of 135 possible points, which reflects a slight increase from its score of 35 in 2017, resulting in an overall ranking of 18th among 40 retailers. The company takes some actions to address toxic chemicals in the products it sells, and this year increased its transparency by making its Restricted Substances List public, but still has room for improvement to keep pace with leading retailers. Over the years, Bed Bath & Beyond has taken leading-edge steps to restrict specific chemicals of concern, but public disclosure of these has slowed in the past couple of years. The company established a Restricted Substances List (RSL) in 2014. Several years ago, it restricted chemicals such as: BPA in food-contact items; triclosan in personal care products; phthalates, lead, and cadmium in baby products; and certain flame retardant chemicals in all products. It urges vendors to seek safer replacements for chemicals on its RSL, which includes a company-wide Manufacturing Restricted Substances List (MRSL).

Opportunities for improvement: Bed Bath & Beyond and buybuy BABY should increase the transparency of the company's chemical policy and implementation efforts. The company should establish a specific list of high priority chemicals of concern and a timeline for restrictions in specific product sectors. It should also commit to evaluating its corporate chemical footprint so that it can report on reductions of chemicals of high concern in a manner similar to its reporting of operational reductions of energy and water consumption. The company should ensure its chemicals policy applies equally across all countries in which it does business.

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



Costco

Letter grade = **C**

Total points = 52.75 out of 135

Costco earned a letter grade of C, scoring 52.75 out of 135 possible points, which reflects a notable improvement from its C- grade in 2017, resulting in an overall ranking of 12th among 40 retailers. The company made demonstrable progress in 2018 in improving its work to address harmful chemicals, most notably by adopting new restrictions on toxic chemicals in textiles and in their manufacturing. The new chemical restrictions for textiles apply to apparel and footwear, textile sporting goods, luggage, handbags, and home textiles, such as blankets, sheets, rugs, and towels. The company also notably disclosed chemicals it is restricting in non-foods packaging, expanded the Smart Screening Program, and is now encouraging suppliers to attain qualified third-party certifications. In 2017, Costco announced its new Chemical Management Policy, which “goes beyond the boundaries of regulatory compliance in an effort to reduce potential chemical harm to humans and to the environment from the product manufacturing process and from consumer use and disposal.” The company encourages suppliers to: “1) Identify chemicals of concern (utilizing comprehensive testing programs); 2) Remove or apply the process of informed substitution for any identified chemicals of concern; 3) Identify ways to change their manufacturing processes to reduce hazardous chemical use; and 4) Encourage Suppliers to review and attain qualified third-party green certifications.” This builds on Costco’s Smart Screening Program, announced earlier in the year, which “identifies and removes chemicals of concern in multiple product categories, including chemicals not yet restricted by laws.” Also in 2017, Costco announced a new partnership with the University of California’s Berkeley Center for Green Chemistry to identify ways to improve its chemical management program, beginning with a focus on three product areas: furniture, textiles, and personal care and household products.

Opportunities for improvement: Costco can continue to make progress by fully disclosing its restricted substance lists by product category, expanding its restrictions on textiles chemicals to eliminate per- and polyfluoroalkyl substance (PFAS) chemicals, setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern, and completely eliminating and safely replacing BPA and per- and polyfluoroalkyl substances (PFAS) in food packaging and food contact materials as well as phthalates 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 = 82.5 out of 135

CVS Health attained a grade of B+ based on a score of 82.5 out of 135 possible points, the sixth highest score of any of the 40 retailers evaluated. CVS Health developed a Cosmetic Safety Policy and, in 2016, disclosed that it developed a list of Chemicals of Consumer Concern (CCCs). The company made notable progress over the past year, disclosing that it had already reformulated 300 out of 600 products for chemicals of concern. In 2017, CVS Health jointly announced with the Mind the Store campaign that it had removed 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 Restricted Substance List (RSL) 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. 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 of 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 chemicals of high concern, engaging brand-name suppliers in the implementation of its policy, expanding its policy to additional chemically intensive product categories, certifying private-label cleaning products to credible third-party standards, such as EPA Safer Choice, Made Safe or Green Seal, and removing bisphenols from thermal receipt paper. CVS Health should pilot the Chemical Footprint Project with key private label suppliers.

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 = **F**

Total points = 0 out of 135

As we found in our last report card, Dollar General is still failing to publicly address toxic chemicals in the products it sells. With a letter grade of F, it was one of twelve retailers (out of 40) in our review to score zero points with no meaningful public-facing commitments to address the safety of chemicals used in the products it sells. While Dollar General states in its 2018 Code of Business Conduct and Ethics that it “is committed to selling safe products that meet or exceed our Company’s standards, as well as legal and regulatory requirements,” 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 or otherwise require disclosure or elimination of chemicals of high concern.

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



Dollar Tree

Letter grade = **D**

Total points = 27.5 out of 135

Dollar Tree (including Family Dollar) attained a letter grade of D, scoring 27.5 out of 135 possible points, ranking it 22nd out of 40 retailers. In 2017, Dollar Tree also received a D. Although the company appears to be taking action to implement its chemicals policy, albeit slowly, it did not appear to make any significant improvements or changes to the policy itself over the past year. Dollar Tree first announced its Commitment to Eliminate Priority Chemicals in June 2017. The policy lists 17 priority chemicals or classes of chemicals that it expects its suppliers to reduce or eliminate from its products by 2020, which is a reasonably aggressive timeline for a significant group of chemicals. Dollar Tree asked suppliers to report products containing these priority chemicals by January 31, 2017 but the company did not publicly disclose the responses. It appears this was a one-time disclosure requirement. In its 2018 Corporate Sustainability Report, Dollar Tree indicates 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 and ensuring oversight by senior management. The company should also expand its policy to cover chemicals used in packaging and manufacturing processes, and become a signatory to the Chemical Footprint Project.

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 = 63 out of 135

The Home Depot earned a B- grade, improving from a C+ in 2017, scoring 63 out of 135 possible points and tying for ninth place among 40 retailers. The company has continued to demonstrate progress on toxic chemicals over the past year, announcing new restrictions on nine toxic chemicals in household cleaning products by 2022 and notably becoming the third major U.S. retailer to announce a ban on methylene chloride- and NMP-based paint strippers in all of its stores by the end of 2018. 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 new strategy includes commitments to restrict hazardous chemicals of concern, such as flame retardants, PFAS, 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 chemicals of high concern; expand the policy by phasing out the use of ortho-phthalates, halogenated flame retardants, PFAS chemicals, methylene chloride, and NMP in other key product categories; and become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers. 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 = 87.75 out of 135

IKEA earned a letter grade of A-, scoring 87.75 out of 135 possible points, the fourth highest score of any of the 40 retailers evaluated. IKEA has an impressive long-term and consistent track record of identifying and phasing out chemicals of high concern in its products well ahead of any government mandate. For example, it eliminated per- and polyfluoroalkyl substances (PFAS) from all of its textiles in 2016, explicitly prioritizing safety over minor concerns about performance change. IKEA maintains a sophisticated chemical policy with significant staff management resources dedicated to working with its suppliers on chemical safety (and sustainability) of its products. The company started IKEA GreenTech, which has invested in DyeCoo Textile Systems, a Dutch company that has developed the first commercially available dyeing technology using no water and fewer chemicals.

Opportunities for improvement: IKEA should do more to be transparent in its metrics and approach. Its explicitly stated preference to avoid third-party certifications and public standards in favor of a “we got this, just trust us” approach lacks the rigor of an openly debated and public standard and ultimately means consumers have a hard time actually knowing if there are unaddressed hazards, while making industry-wide cooperation and shared learning more difficult. 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 = **D**

Total points = 29.75 out of 135

Kohl's has started to make progress on addressing toxic chemicals in the products it sells, earning just 29.75 points and a letter grade of D and ranking 21st out of 40 retailers. Following the company's recent posting of a chemicals policy on its website, Kohl's achieved a significant improvement over its grade of F with zero points in 2017. It is unclear if the policy itself is new or just newly disclosed—Kohl's did not respond to our opportunity to clarify its policies in 2017 and the policy itself is not dated.

Opportunities for improvement: Kohl's can make progress by adding more detail to its policy to specify the processes for testing and auditing its suppliers, releasing its RSL publicly, and by setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern from its private-label and "direct import" products. Additionally, Kohl's should work to apply its chemical policy to other products it sells beyond its private label and direct imports.



Kroger

Letter grade = **D+**

Total points = 34.75 out of 135

With 34.75 out of 135 possible points, Kroger earned a grade of D+, an improvement over its grade of D- in our last two report cards, ranking 20th among 40 retailers. The company has begun to take some action to address toxic chemicals in the products it sells, but still has significant room for improvement. Kroger has no public safer chemicals policy. It stated last year that it is currently working with key stakeholders to review options for a future chemicals policy but has not launched one since then. 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.” The company is also in the process of developing a restricted substance list (RSL) for apparel going beyond regulatory requirements. Kroger has made some limited progress in reducing the use of BPA in canned food liners in 2018. 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%. It has a goal to move to BPA-free liners in 100% of its brands of canned food. However, the company has not disclosed a timeframe or plan for completely eliminating and safely replacing BPA in canned food liners.

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

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



Loblaws

Letter grade = **C**

Total points = 52 out of 135

Loblaws earned a grade of C, scoring 52 out of a possible 135 points and ranking 13th among 40 retailers scored.

Loblaws has a public safer chemicals policy that includes a BRSI 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 in two of its private-label product lines by the end of 2018, and mentioned an ongoing effort to "encourage [its] suppliers to identify and eliminate phthalates that may come from other sources, such as manufacturing equipment and packaging." The company reported progress on this initiative, stating that it "successfully stopped manufacturing products formulated with plastic microbeads, triclosan and phthalates by year-end 2017." The company stated: "We continue to encourage our suppliers to identify and eliminate phthalates that may come from manufacturing equipment and packaging." 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 public BRSIs for a broader assortment of private-label and brand-name products in key product categories, setting public quantifiable goals with clear timelines for removing BPA and other bisphenols from receipts, and completely eliminating and safely replacing BPA and per- and polyfluoroalkyl substances (PFAS) in food packaging and food contact materials as well as phthalates 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 = **D+**

Total points = 36 out of 135

Lowe's earned a D+ grade, scoring 36 out of 135 possible points, reflecting a demonstrable improvement from its D- grade in 2017, and resulting in a rank of 19th among 40 retailers. Over the past year, the company made its first-ever commitment to developing a comprehensive chemicals policy and 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 leverage its successes by phasing out methylene chloride, NMP, and ortho-phthalates in other products it sells, develop a written safer chemicals policy, and set public quantifiable goals with clear timelines for reducing and eliminating additional chemicals of high concern such as halogenated flame retardants and PFAS chemicals in other key product categories. Lowe's should become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers. Lowe's should also pilot the Health Product Declaration with suppliers.

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



Macy's

Letter grade = **F**

Total points = 13 out of 135

Macy's received a letter grade of F, scoring 13 out of 135 possible points and tying for a rank of 23rd out of 40 retailers. This represents a drop from our last report card in which the company scored 16 out of 135 points. The company, which also owns Bloomingdale's and Bluemercury, started to take some actions to address toxic chemicals in its products back in 2015, but still has much room for improvement. Macy's does not have a public safer chemicals policy. Macy's committed to eliminating flame retardants in the furniture it sells in 2015, but has not publicly discussed the status of this commitment or disclosed any major initiatives since then. Macy's subsidiaries do promote safer products online by highlighting natural or clean beauty products, but Macy's itself does not currently highlight these products as much as it had in 2017. The company also sells sheets, bath towels, and rugs with the label of "Made in Green by OEKO-TEX," which appears to mean that certain toxic chemicals are limited. However, the company doesn't appear to require its products to be certified to a third-party safer chemicals standard and doesn't appear to require the disclosure of ingredients to show that these products are in fact safer. The product development organization of Macy's is assessing the factories in the company's supply chain using the Higg index, which measures activities including chemical use and management.

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

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



McDonald's

Letter grade = **F**

Total points = 0 out of 135

McDonald's is failing to publicly address key toxic chemicals – BPA, ortho-phthalates, and PFAS – in its food supply chain. With a grade of F, it was one of twelve retailers (out of 40) in our review to score zero points with no significant relevant public-facing commitments to address the safety of chemicals in its supply chain. Despite substantial public attention to BPA, phthalates and PFAS in food packaging and phthalates in processing equipment, there is no indication that McDonald's is taking any action to address these challenges. Although McDonald's 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: McDonald's can make progress by developing a public written safer chemicals policy covering at least these three chemicals, setting public quantifiable goals with clear timelines, and completely eliminating and safely replacing BPA and per- and polyfluoroalkyl substances (PFAS) in food packaging and food contact materials as well as phthalates in food and food contact materials in its supply chain. McDonald's should also become a signatory to the Chemical Footprint Project.

NORDSTROM

Nordstrom

Letter grade = **F**

Total points = 11 out of 135

Nordstrom is failing to publicly address toxic chemicals in the products it sells. With a letter grade of F, it scored only 11 out of 135 possible points, ranking 26th out of 40 retailers.

Nordstrom received credit for adopting the American Apparel and Footwear Association (AAFA) RSL in 2010. The company offers 50 brands of sustainable apparel products, labeled “eco-conscious style,” that comply with the HIGG Index.

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



Office Depot

Letter grade = **F**

Total points = 5.5 out of 135

Office Depot (which includes OfficeMax) is failing to publicly address toxic chemicals in the products it sells. With a grade of F and a score of 5.5 points out of 135, it ranked 29th among 40 retailers evaluated. It scored only minimal points for offering consumers a pathway to potentially safer products on its website, as well as for “recommending” suppliers of its private-label products utilize third-party standards. Otherwise, the retailer has no significant public-facing commitments to address the safety of chemicals used in the products it sells or in its private brands. This is the second year that Office Depot has been included in the Retailer Report Card and its second year of earning an F. It has shown minimal signs of responding to consumer demand for safer chemicals policies.

Office Depot does promote “green” products and those with “reduced chemicals,” but offers no criteria, credible third-party certifications, or disclosures in order to justify such claims. 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, and the lack of a clear set of standards to be met prevent us from awarding points to Office Depot.

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

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



Panera Bread

Letter grade = **F**

Total points = 8.5 out of 135

Panera Bread has earned 8.5 points out of 135, a grade of F, and ranked 29th out of 40 retailers.

Panera has established a chemical policy related to restricted substances in food packaging and the food contents therein, but has not disclosed its restricted substance list (RSL). The company also indicated in 2016 that it was working on PFAS in packaging, but has not disclosed the details of its activities or progress since then. Panera Bread has also established a strong “Food Policy” and “No No List” for ingredients it doesn’t allow in food and should expand these efforts to address key toxic chemicals that are indirect food additives – BPA, ortho-phthalates, and PFAS – in its food supply chain.

Opportunities for Improvement: Building on its Food Policy and No No List, Panera can make progress by publicly disclosing its packaging RSL, developing a public written safer chemicals policy covering at least BPA, ortho-phthalates and PFAS in the food supply chain, setting public quantifiable goals with clear timelines including a timeline for banning PFAS chemicals from food contact materials, and completely eliminating and safely replacing BPA and per- and polyfluoroalkyl substances (PFAS) in food packaging and food contact materials as well as phthalates in food and food contact materials in its supply chain. 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 135

Publix is failing to publicly address toxic chemicals in the products it sells. With a letter grade of F, it was one of twelve retailers in our review to score zero points with no significant public-facing commitments to address the safety of chemicals used in the products it sells.

Opportunities for Improvement: Publix can make progress by developing a public written safer chemicals policy, developing and enforcing a public restricted chemicals list, setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern, and completely eliminating and safely replacing BPA and per- and polyfluoroalkyl substances (PFAS) in food packaging and food contact materials as well as phthalates 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 = 0 out of 135

Restaurant Brands International (RBI), including subsidiaries Tim Hortons, Burger King and Popeyes, is failing to publicly address key toxic chemicals – BPA, ortho-phthalates, and PFAS – in its food supply chain. With a grade of F, it was one of twelve retailers (out of 40) in our review to score zero points with no significant relevant public-facing commitments to address the safety of chemicals in its supply chain. Despite substantial public attention to BPA, phthalates and PFAS in food packaging and phthalates in processing equipment, there is no indication that RBI is taking any action to address these challenges.

Opportunities for Improvement: RBI can make progress by developing a public written safer chemicals policy covering at least these three chemicals, setting public quantifiable goals with clear timelines, and completely eliminating and safely replacing BPA and per- and polyfluoroalkyl substances (PFAS) in food packaging and food contact materials as well as phthalates in food and food contact materials in its supply chain. RBI should also become a signatory to the Chemical Footprint Project.



Rite Aid

Letter grade = **B+**

Total points = 81.5 out of 135

Rite Aid earned a letter grade of B+, scoring 81.5 out of 135 possible points, ranking seventh out of 40 retailers in overall scoring. The company has more than doubled its 2017 score of 36.5 points. In 2017, Rite Aid disclosed to us that it was beginning to develop a safer chemicals program that included a Beyond Restricted Substances List (BRSL) 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 grade this year by adopting a new safer chemicals policy and a significantly expanded RSL in September 2018, developing a range of accountability measures, reporting continued progress on eliminating chemicals of high concern 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 and to encourage suppliers to disclose ingredients to Rite Aid itself and to its customers (including fragrance ingredients).

Opportunities for improvement: Rite Aid can make even more progress by setting public quantifiable goals 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. Rite Aid can also improve by requiring suppliers to conduct alternatives assessments to avoid regrettable substitutions. The company should also become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.

SALLY BEAUTY®

Sally Beauty

Letter grade = **F**

Total points = 0 out of 135

Sally Beauty is failing to publicly address toxic chemicals in the products it sells. With a grade of F, it was one of twelve retailers (out of 40) 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 second year we have scored Sally Beauty and the company's second year earning zero points. Despite substantial public attention to chemicals of high concern 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, setting public quantifiable goals with clear timelines for reducing and eliminating chemicals of high concern, and starting to require its suppliers to disclose chemicals of high concern in their products as a step towards full disclosure. Sally Beauty should also become a signatory to the Chemical Footprint Project and pilot it with key suppliers.

SEPHORA

Sephora

Letter grade = **C**

Total points = 50.25 out of 135

Sephora earned a grade of C, scoring 50.25 out of 135 possible points, ranking 15th out of 40 retailers. This represents an improvement over its score of a D last year and was primarily driven by the company's increased identification of products formulated without chemicals of high concern on its website, its confirmation that its RSL applies globally, its confirmation that it received full ingredient disclosure on private label products, and the steps it is taking towards addressing the chemical safety of brands it sells.

On the positive side, Sephora has an extensive restricted substances list (RSL) for its private-label products, which, according to information provided by the company, includes all but two of the "Hazardous 100+" chemicals identified by Mind the Store. In fact, Sephora's RSL, which the company states contains more than 1,400 compounds, has been in place for a decade. Sephora also collects a full list of ingredients for its private label products, including, according to the retailer, fragrance ingredients. Unfortunately, Sephora does not make its RSL publicly available, nor does it provide public metrics on the use or reduction of chemicals of concern. Sephora also does not appear to apply restrictions on the use of chemicals in products it sells from other brands, although in 2018 it started a voluntary recognition program for brands that meet a far narrower RSL.

Opportunities for Improvement: In addition to providing more public information about its ongoing efforts to address chemicals of concern in its private-label brands, Sephora can continue to identify opportunities to expand its program to include products made by others sold in its stores, first through disclosure and ultimately with an RSL. The company can increase transparency of ingredients of its private-label brands by disclosing the constituents of fragrances. Sephora should also become a signatory to the Chemical Footprint Project and publicize the results.



Sobeys

Letter grade = **F**

Total points = 0 out of 135

Sobeys is failing to publicly address toxic chemicals in the products it sells. With a letter grade of F, Sobeys was one of twelve retailers (out of 40) in our review to score zero points with no significant public-facing commitments to address the safety of chemicals used in its private brands or in the other products it sells. The company commits 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 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. The company can make progress by removing phthalates and triclosan from personal care products and completely eliminating and safely replacing BPA and per- and polyfluoroalkyl substances (PFAS) in food packaging and food contact materials as well as phthalates in food and food contact materials in its supply chain. 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 requiring that fragrance ingredients are listed in personal care and cleaning products.

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



Staples

Letter grade = **D+**

Total points = 37.5 out of 135

Staples earned a grade of D+, scoring 37.5 out of 135 possible points and ranking 17th out of 40 retailers. Staples has not publicly released or implemented a chemical policy that was shared with us last year for planned release in 2018, although the company indicated to us that it is still working to release it at the end of the year. Staples' low grade is especially disappointing since in the first half of this decade, Staples was an emerging leader in addressing chemicals of concern in the products that it sold. It was the first major retailer to become a signatory of the Chemical Footprint Project, actively participated in partnerships with NGOs and other companies, and earned an award from the US EPA recognizing its efforts to promote Safer Choice-certified products. Since then, while it has made some important progress in specific initiatives, such as addressing chemical flame retardants in chairs, progress at the company towards a comprehensive policy seems to have slowed or even regressed.

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



Starbucks

Letter grade = **F**

Total points = 0 out of 135

Starbucks is failing to publicly address key toxic chemicals – BPA, ortho-phthalates, and PFAS – in its food supply chain. With a grade of F, it was one of twelve retailers (out of 40) in our review to score zero points with no significant relevant public-facing commitments to address the safety of chemicals in its supply chain. Despite substantial public attention to BPA, phthalates and PFAS in food packaging and phthalates in processing equipment, there is no indication that Starbucks is taking any action to address these challenges. Although 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 at least these three chemicals, setting public quantifiable goals with clear timelines, and completely eliminating and safely replacing BPA and per- and polyfluoroalkyl substances (PFAS) in food packaging and food contact materials as well as phthalates in food and food contact materials in its supply chain. Starbucks should also become a signatory to the Chemical Footprint Project.



Subway

Letter grade = **F**

Total points = 0 out of 135

Subway is failing to publicly address key toxic chemicals – BPA, ortho-phthalates, and PFAS – in its food supply chain. With a grade of F, it was one of twelve retailers (out of 40) in our review to score zero points with no significant relevant public-facing commitments to address the safety of chemicals in its supply chain. 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.

Opportunities for Improvement: Subway can make progress by developing a public written safer chemicals policy covering at least these three chemicals, setting public quantifiable goals with clear timelines, and completely eliminating and safely replacing BPA and per- and polyfluoroalkyl substances (PFAS) in food packaging and food contact materials as well as phthalates in food and food contact materials in its supply chain. Subway should also become a signatory to the Chemical Footprint Project.



Target

Letter grade = **A**

Total points = 95.5 out of 135

Target was awarded an A grade, receiving 95.5 out of 135 possible points, the second highest score of any retailer evaluated, which reflects an improvement from its B+ grade awarded in 2017. Target has continued to implement its policy in 2018, building on progress it has made over the past few years. In 2018, the company developed an RSL and MRSL for textiles (adopting the ZDHC MRSL) 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 announced an impressive new safer chemicals policy along with ambitious goals to increase transparency of chemicals in products; reduce and eliminate classes of harmful chemicals in textiles, beauty, baby care, personal care, and household cleaning products; and invest in green chemistry research into safer alternatives. The policy applies to the company's "entire value chain, operations and every product" it sells, including both private-label and brand-name products. The policy includes clear goals and timeframes for reducing harmful chemicals, and the company has committed to expand the policy to address other product categories and chemicals in manufacturing over time. Target has pledged to publicly report on implementation in the year to come. Additionally, Target has become a signatory to the Chemical Footprint Project and plans to participate in the upcoming 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. The company should also expand its policy to address other chemically-intensive product categories such as electronics, baby and children's products/toys, food, and food packaging (specifically PFAS chemicals and ortho-phthalates in food contact materials and the food supply chain).

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



TJX Companies

Letter grade = **F**

Total points = 0 out of 135

TJX Companies (the parent of TJ Maxx, Marshalls and HomeGoods) is still failing to publicly address toxic chemicals in the products it sells. With a letter grade of F, it was one of twelve retailers (out of 40) 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, but these don't appear to go beyond regulatory compliance. TJX's supplier training program only includes an overview of legal requirements on chemicals and hazardous materials and information on hazardous waste management. TJX does not appear to have a Beyond Restricted Substance List or otherwise require disclosure or elimination of chemicals of high concern. This company reported moving away from BPA-containing receipt paper in its 2013 sustainability report, but recent testing by Ecology Center found that the company is using the regrettable substitute of BPS in receipts (at least at two Home Goods stores).

Opportunities for improvement: TJX 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. The switch from BPA to BPS in receipt paper clearly highlights the need for a robust policy. TJX can also expand its existing audit process to verify compliance with such a policy. TJX 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 TJX, the parent company.

TRADER JOE'S

Trader Joe's

Letter grade = **F**

Total points = 9.5 out of 135

Trader Joe's is still failing to publicly address toxic chemicals in the products it sells. Although the company's score increased from 0 points in our last report card to 9.5 in this one, Trader Joe's still receives an F and ranked 27th out of 40 retailers evaluated. 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. Trader Joe's announced it would be moving to phenol-free receipt paper in January 2018, and the company updated the November 2017 statement in May of 2018 to notify the public that it would be rolling out non-phenol receipt paper in the next few months.

Opportunities for improvement: Trader Joe's can make progress by developing a comprehensive 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. The company should also confirm its progress on replacing phenol receipt paper with a safer substitute. Trader Joe's should further completely eliminate and safely replace BPA and per- and polyfluoroalkyl substances (PFAS) in food packaging and food contact materials as well as phthalates in food and food contact materials in its supply chain. The company should become a signatory to the Chemical Footprint Project and pilot it with key private label suppliers.



Ulta Beauty

Letter grade = **F**

Total points = 13 out of 135

Ulta Beauty earned a grade of F, scoring 13 out of 135 possible points, tying for 23rd place out of 40 retailers evaluated. Unfortunately, this is a lower grade than the company scored in our last report card, making Ulta one of only four to move backwards. This decline was driven by the fact that Ulta provides no public accountability or detail on its chemical safety programs and therefore we have been unable to score improvements or changes. The company earned points for making efforts in recent years to require the suppliers of its private-label products to eliminate chemicals of high concern identified in a private list that goes beyond legal requirements as new products are added and existing products reformulated. This list includes prohibitions on parabens, formaldehyde releasing preservatives, BHA & BHT, alkylphenol ethoxylates, and toluene and xylene in nail products. Unfortunately, Ulta has made little of this information public, only sharing limited, non-quantified information with us for the purposes of this report. While it labels its reformulated products as “free from” specific chemicals, this information is not readily searchable on its website or displayed in store, making it difficult for consumers to identify safer products. Ulta does not appear to be taking action with suppliers outside of those producing its private-label brands.

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



Walgreens

Letter grade = **B-**

Total points = 70.5 out of 135

Walgreens earned a B- grade, scoring 70.5 out of 135 possible points, and ranking eighth out of 40 retailers. This represents a significant improvement from 2017 when Walgreens received a D-. The company's improved score is due to the release of its new safer chemicals policy, including public quantifiable goals and a public RSL. 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, and has already made strides in reformulating sunscreens so that a majority of the formulations do not contain two chemicals of concern. 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 to obtain third-party safer chemicals certifications for their products.

Opportunities for improvement: The company can improve by strengthening accountability measures, including conducting its own testing and requiring suppliers to test in third-party approved laboratories. Walgreens should also expand the scope of its policy beyond the categories currently covered 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 = 93.75 out of 135

Wal-Mart Stores (Walmart and Sam’s Club) earned a grade of A-, the same letter grade as it did in 2017, scoring 93.75 out of 135 possible points, the third highest score of any retailer evaluated. 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. The company has yet to report on other progress in implementing its policy in 2018 but has indicated it plans to share a progress update later this year. Last year, 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. In 2017, Walmart stated a new goal: by “2022, Walmart aims to reduce its consumables chemical footprint for Walmart U.S. and Sam’s Club U.S. stores by 10 percent,” which translates to a reduction of toxic chemicals of 55 million pounds. Since 2014, Walmart has reduced the use of 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%, expanding the policy to include key chemically intensive product categories (such as apparel, electronics, food, and furniture), piloting the Chemical Footprint Project with key private label suppliers, and reducing priority chemicals in use by Sam’s Club, which grew 13% by weight since 2014. As the largest grocery chain in America, Walmart should set a goal to phase out per- and polyfluoroalkyl substances (PFAS) chemicals in food packaging and food contact materials and phthalates in food and food contact materials in its supply chain. The company should also expand its policy globally.

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



Whole Foods Market

Letter grade = **B+**

Total points = 83.75 out of 135

Whole Foods Market, which was acquired by Amazon in 2017, earned a letter grade of B+, scoring 83.75 out of 135 possible points and ranking fifth out of 40 retailers evaluated. In 2017, Whole Foods Market scored a B+ due in part to its significant steps toward ensuring cleaning and body care products are free of certain toxic chemicals, and overall, the company continued to improve this year. Whole Foods Market has several policies around chemicals – including the Eco-Scale rating system, the first cleaning product standard of any retailer; Body Care Quality Standards; and protocols for chemicals not allowed in packaging, such as BPA in can linings. 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 last year, 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. Although there were no substantive additions to the Eco-Scale banned lists this year, the company is working toward a refresh of this standard and expects to add more ingredients next year. Whole Foods Market also plans to strengthen Body Care Quality Standards. Additionally, Whole Foods Market has reported continued progress in moving away from BPA in packaging, and confirmed the absence of benzophenone in body care products. Note that Whole Foods Market has removed the list of premium body care products that had been available on many stores' webpages. Whole Foods Market will be requiring the disclosure of fragrance components on household cleaning products according to CA SB 258 in October 2019 in all states.

Opportunities for improvement: Whole Foods Market can make progress by expanding its policy to cover additional product categories and chemicals in manufacturing processes, including specific public quantifiable goals for the reduction or elimination of chemicals of high concern, and completely eliminating and safely replacing BPA and per- and polyfluoroalkyl substances (PFAS) in food packaging and food contact materials as well as phthalates in food and food contact materials in its supply chain. The company can also augment its practices for holding suppliers accountable to the policy. Whole Foods Market should require full disclosure of fragrance ingredients to itself, not just 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 135

Yum! Brands, including subsidiaries KFC, Pizza Hut and Taco Bell, is failing to publicly address key toxic chemicals – BPA, ortho-phthalates, and PFAS – in its food supply chain. With a grade of F, it was one of twelve retailers (out of 40) in our review to score zero points with no significant and relevant public-facing commitments to address the safety of chemicals in its supply chain. 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 at least these three chemicals, setting public quantifiable goals with clear timelines, and completely eliminating and safely replacing BPA and per- and polyfluoroalkyl substances (PFAS) in food packaging and food contact materials as well as phthalates in food and food contact materials in its supply chain. 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. Retailers continue to drive toxic chemicals out of consumer products.** Such as methylene chloride & NMP in paint strippers; phthalates, parabens, and formaldehyde in beauty and personal care products; and oxybenzone in sunscreens
- 2. Top retailers continue to strengthen or adopt new chemicals policies.** Walgreens, Rite Aid, and Amazon are the most improved retailers of the year; Target, Lowe's, Costco, Kohl's, and Sephora also reported major gains in 2018
- 3. Retailers are aligning around a common list of chemicals of concern.** Several thousand chemicals are being screened and whole chemical classes phased out
- 4. Food retailers seriously lag behind others in reducing chemical hazards.** Restaurant and grocery chains have been slow to announce chemicals policies and publicly address chemicals such as phthalates and PFAS in packaging and other food contact materials
- 5. Too many retailers fail to address the chemical safety of their products.** Almost half the retailers evaluated lacked even the most basic public chemicals policy

1.

Retailers continue to drive toxic chemicals out of consumer products.

Such as methylene chloride & NMP in paint strippers; phthalates, parabens, and formaldehyde in beauty and personal care products; and oxybenzone in sunscreens

Ten retailers, led by **Lowe's**, have committed to ending the sale of chemical paint strippers containing methylene chloride or N-methylpyrrolidone (NMP), most by the end of 2018, at more than 25,000 stores in the United States, Canada, Mexico, and other countries. The Mind the Store campaign urged this retail leadership to break the logjam created by the U.S. Environmental Protection Agency (EPA) when it shelved a proposed rule to phase out the deadly chemicals as required by the newly reformed Toxic Substances Control Act. Soon following Lowe's leadership were **Sherwin-Williams, The Home Depot, Walmart, True Value, PPG Paints, AutoZone, Kelly-Moore Paints, Canadian Tire, and Home Hardware**. The most compelling

voices for retail leadership came from three families whose loved ones were killed from the use of these products. The lack of public action of EPA and W.M. Barr, the nation's largest paint stripper manufacturer, stands in sharp contrast to this remarkable leadership of retailers. At least three paint stripper brands have recently announced new products coming to market that are free of methylene chloride and NMP, showing the power of retailers to drive the development of safer solutions.

Several retailers are phasing out phthalates, a class of hormone-disrupting chemicals largely banned in Europe but which the U.S. and Canadian governments still allow in most products. **Rite Aid** is on track to eliminate two phthalates from 100% of its private-label products by 2020 and recently expanded its chemicals policy to phase out nine additional phthalates in all formulated products, including national brands. **The Home Depot** announced this year that it will prohibit nine chemicals in household cleaning products by the end of 2022, including two phthalates. **Amazon, CVS Health, Kroger, Loblaw, Target, Walgreens,** and **Walmart** are also reducing the use of phthalates in beauty and personal care products and/or household cleaning products with the goal of elimination.

IKEA recently phased out oxybenzone (also known as benzophenone-3) in surface coatings and plastics, while **Whole Foods** and **Walgreens** are driving the same toxic chemical out of sunscreens. Several retailers are working with suppliers to switch to safer alternatives to other chemicals of high concern, such as parabens, formaldehyde-donors, nonylphenol ethoxylates (NPEs), triclosan, and bisphenol A (BPA). Aldi also reported a complete elimination of alkylphenol ethoxylates (including NPEs) and perfluorinated compounds (PFCs) in all apparel, footwear, and household textiles. **Aldi, Costco,** and **Target** are driving chemicals of concern from clothing production through a [Manufacturing Restricted Substance List](#) from the Zero Discharge of Hazardous Chemicals program of textile brands.

2.

Top retailers continue to strengthen or adopt new chemical policies.

Walgreens, Rite Aid, and Amazon are the most improved retailers of the year; Target, Lowe's, Costco, and Sephora also reported major gains in 2018

Retailers are steadily improving their chemicals policies and practices for the products and packaging they buy and sell.

- Twenty-one out of twenty-nine retailers (72%) evaluated in 2017 and 2018 improved over the last year.
- Since 2016, eleven retailers improved their grade from a D+ to a C+.
- Since 2017, eighteen more retailers improved their grade from a D to a D+.

Three companies earned “most improved retailer” accolades, after adopting major new chemicals policies in 2018. As a result, their grades improved, as shown below along with each retailer’s overall ranking (in points) among all forty retailers evaluated.

- **Walgreens** improved its grade from a D- to a B- over the past year, ranking #8. Walgreens’s policy sets a goal of eliminating chemicals on its Restricted Substances List (RSL), mostly from its own brand of baby, beauty, personal care, and household cleaning products, by 2021.
- **Rite-Aid** rose from a grade of D+ last year to a B+, ranking #7. Rite Aid expanded its RSL to sixty-nine chemicals of high concern that must be phased out from products made by national brands. The company has also committed to restrict a large list of more than two thousand individual chemicals in both private-label and national- brand beauty and personal care products.
- **Amazon** improved its grade from an F in 2016 to a C this year, rising to #14. The fast-growing e-commerce retail leader rolled out its very first chemicals policy in 2018. It includes an RSL of 54 chemicals of concern to avoid in its private-brand products, including baby, beauty, personal care, and household cleaning. But the Amazon policy lacks quantifiable goals and doesn’t apply to other brands, third-party sales, or packaging.

Other retailers also reported significant gains. **Target** (#2) turned in a grade A performance by expanding its policy and reporting specific reductions, leapfrogging **Walmart** (#3) for retail leadership. **Lowe’s** (#19), whose chemicals policy is still under development, scored extra points for being the first retailer to phase out deadly paint stripping chemicals.

Costco (#12) made a number of improvements to its chemicals management policy including new Restricted Substance Lists for textiles and non-foods packaging, climbing to a C grade. Department store leader **Kohl’s** (#21) climbed up from an F grade last year by adopting a chemicals policy that applies an undisclosed RSL mostly to its own-brand products. **Sephora** (#15), the beauty product leader, launched a new program to feature products free of chemicals of concern for an improved C grade.

3.

Retailers are aligning around a common list of chemicals of concern.

Several thousand chemicals are being screened and whole chemical classes phased out

Increasingly, major retailers are anchoring their chemicals policies with a commonsense approach that continually seeks to transition products and packaging to less hazardous ingredients. Central to that strategy is reliance on a “list of lists” of chemicals known to have inherently hazardous properties, derived from authoritative science-based sources.

For example, **Rite Aid** will encourage its suppliers to avoid chemicals of concern included on the authoritative lists referenced by the [Beauty and Personal Care \(BPC\) “stewardship list.”](#) **Walgreens** has committed to monitoring the same list of chemicals in its beauty and personal care products over time. The [authoritative lists that make up the “stewardship list” includes thousands](#) of carcinogens, reproductive toxicants, endocrine disruptors and other hazardous chemicals derived from six lists developed by authoritative government agencies in California, United States, Europe, and other regions. The BPC initiative was catalyzed by **Walmart** and **Target**, which brought together beauty and personal care industry stakeholders to align around a common sustainability framework, known as the BPC Product Sustainability Rating System, that emphasizes ingredient disclosure and human health.

Increasingly retailers are also taking a class-based approach to chemical safety by phasing out entire groups of closely related chemicals, rather than waiting years for hazard data gaps to be filled on a chemical-by-chemical basis. In the past, similar chemicals have been substituted for one hazardous chemical, only to be found later to pose similar hazards, resulting in costly repeated reformulations and extended health hazards for consumers.

Early pioneers of this cost-effective approach for avoiding classes of chemicals of concern include **Apple** (#1), which phased out all halogenated compounds in its computers, and **IKEA** (#4), which ended all use of per- and polyfluoroalkyl substances (PFAS) in textiles. More recently, several retail leaders have committed to exiting the use of several classes of chemicals, including all *ortho*-phthalates, parabens, formaldehyde-donors, and nonylphenol ethoxylates (NPEs) in a variety of consumer products. **CVS Health** (#6), for example, reports that so far more than 300 beauty and personal care products have been reformulated without 11 phthalates, 19 parabens, or formaldehyde (including 11 donor compounds that release formaldehyde over time).

Retailers are also increasingly urging suppliers to avoid regrettable substitution by specifying chemicals on the [Safer Chemical Ingredients List](#) from EPA’s Safer Choice program, for example.

4.

Food retailers seriously lag behind others in reducing chemical hazards.

Restaurant and grocery chains have been slow to announce chemicals policies and publicly address chemicals such as phthalates and PFAS in packaging and other food contact materials

Food retailers are largely failing to adequately protect consumers from chemical hazards associated with packaging and other food contact materials. By food retailers, we mean those companies that sell groceries (including both grocery chains as well as big box retailers) as well as restaurant chains that sell prepared meals (including all the subsectors: fast food, fast casual food, family dining, coffee shops, sandwich shops, etc.).

The average grade for the six restaurant chains evaluated, a new retail sector scored in this year’s report card for the first time, was a resounding F for failure. Only **Panera Bread** (#28), the fast casual food leader, scored

any points at all for having an (undisclosed) restricted substances list for packaging and beginning to work on phasing out PFAS in all of its packaging. Other restaurant chains failed to score any points at all or even respond to their draft grades including fast food leader **McDonalds** and its competitors **Restaurant Brands International** (Burger King, Popeyes, Tim Hortons) and **Yum! Brands** (Taco Bell, KFC, Pizza Hut), coffee leader **Starbucks**, and sandwich king **Subway**.^[i]

Grocery chains fared somewhat better, with the nine retailers evaluated (not including the big box grocery sellers) scoring an average grade of D+. However, the strongest leadership in the grocery sector from **Whole Foods** (#5, B+) and new entries **Aldi** (#9, B-) and **Loblaws** (#13, C) results almost entirely from progress they have made in restricting chemicals in personal care products, not from food packaging and other food contact materials. The one bright spot is really yesterday's story – grocery chains like **Albertsons** (#16) and **Kroger** (#20) have successfully phased out most uses of bisphenol A (BPA) in the linings of their private-brand canned foods, capping an industry trend over the decade.

Earlier this year, the Mind the Store campaign and allies sent a letter alerting more than 75 of the largest food retailers to the hazards associated with phthalates and the highly fluorinated chemicals known as per- and polyfluoroalkyl substances (PFAS) and to opportunities to eliminate those chemicals from food contact materials. These toxic chemicals migrate from food packaging, during food preparation (such as from disposable gloves), and upstream in the supply chain during food processing with plastics, rubber, and other food contact materials. We are what we eat, it's said, and consumer concern about industrial chemicals in food continues to rapidly grow.

5.

Too many retailers fail to address the chemical safety of their products.

Almost half the retailers evaluated lacked even the most basic public chemicals policy

Nineteen of forty major retailers received a grade of F for failure to announce policies or publicly report progress to assess, reduce or eliminate chemicals of concern in the products or packaging they sell. These retailers serve consumers at tens of thousands of stores in the U.S. and Canada. Yet they have little or no discernible public commitment to the chemical safety of the products and packaging they sell.

Twelve of these retailers scored zero points out of a possible 135. Among the companies evaluated, the worst retail performers on chemical safety included these brands:

- 5 restaurant companies representing 9 brands: Burger King, Kentucky Fried Chicken, McDonalds, Pizza Hut, Popeyes, Taco Bell, Tim Hortons, Starbucks, and Subway
- 2 discount chains: Dollar General and 99 Cents Only

- 2 grocery chains: Publix and Sobeys
- 1 beauty retailer: Sally Beauty
- 1 home improvement chain: Ace Hardware
- 1 apparel and home fashions retailer representing several brands including: T.J. Maxx, Marshalls, HomeGoods, Sierra Trading Post and others

Several retail sectors lag behind others in chemical safety policies and practices. The worst performing retail sectors included:

- Restaurants: F grade average for 6 retailers
- Department Stores: F grade average for 4 retailers
- Dollar Stores: F grade average for 3 retailers
- Beauty Shops: D- grade average for 3 retailers
- Office Supplies: D- grade average for 2 retailers

With retailers on the front lines of consumer discontent with product safety, much work remains to ensure that unnecessary toxic chemicals are no longer used to make the products and packaging we buy for our families.

[i] While we evaluated restaurants on the same basic elements of chemicals policy as other retailers, we limited our review to chemicals used in food contact materials such as packaging, disposable gloves, and upstream sources in the supply chain, with an emphasis on per- and polyfluoroalkyl substance (PFAS), bisphenol A (BPA), and ortho-phthalates.

Conclusion & Recommendations



Retailers remain on the frontlines of consumer discontent with product safety and hazardous chemicals in everyday household products. During the past year, some of America’s largest retailers have taken significant steps to drive harmful chemicals out of products, 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.

The legal, financial, and regulatory risks associated with toxic chemicals only continue to grow. Retailer reputation and customer loyalty are also at jeopardy, especially when the EPA and other agencies are rolling back laws and 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 demanding greater transparency and safer products.

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

Recommendations

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

- 1. POLICY:** Publish a written safer chemicals policy, with senior management and board level engagement and accountability for suppliers, which measures and publicly reports on continuous improvement toward reducing, eliminating and safely substituting replacing toxic chemicals in products and packaging;
- 2. GOALS AND METRICS:** Develop clear public goals with timelines and quantifiable metrics to measure success in eliminating chemicals of concern and reducing retailers' chemical footprint;
- 3. TRANSPARENCY:** Embrace “radical transparency” to meet rising consumer demand for: full public disclosure of chemical ingredients in products and packaging; 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?* 2018 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 third-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 2018, *Who's Minding the Store?* evaluated the safer chemicals policies of forty¹ 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, Costco, CVS Health, Dollar General, Dollar Tree, The Home Depot, Ikea, Kohl's, Kroger, Loblaw, Lowe's, Macy's, McDonald's, Nordstrom, Office Depot, Panera Bread, Publix, Restaurant Brands International (Burger King, Popeyes, Tim Hortons), Rite Aid, Sally Beauty, Sephora, Staples, Starbucks, Sobeys, 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 forty U.S. retailers by sales](#) or they commanded the largest market share in one of twelve major retail sectors (see the sectors in the chart on the next page).

New retailers evaluated in 2018: This year's report card includes 12 new retailers with 40 companies in total. The new companies include an apparel chain, a [dollar store chain](#), an array of grocery stores, and, for the first time, six of the U.S.'s largest restaurant and fast food chains. This year we also included two chains based in Canada to expand the geographic scope of the report card.

Restaurant chains evaluated: Given the prevalence of chemicals of concern in food contact materials and the food supply, the report card now includes restaurant chains (including the subsectors: fast food, fast casual food, family dining, coffee shops, sandwich shops, etc.) for the first time. This follows letters we recently [sent to over 75 of North America's top grocery and restaurant chains](#). Our evaluation of restaurant chains only covers corporate chemicals policies on per- and polyfluoroalkyl substances (PFAS), bisphenol-A (BPA), and ortho-phthalates in food contact and food packaging materials as well as ortho-phthalates that are unintentionally introduced into the food itself throughout the supply chain. Our evaluation this year did not address restaurants' policies related to other chemical sustainability issues (e.g. direct food additives, pesticides, GMO's, etc.).

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

¹ Babies "R" Us is not being evaluated this year given its store closures. While Amazon.com and Whole Foods are one company, they are being graded separately given the differences in their respective sustainability policies. Thus, we evaluated 41 stores.

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, Loblaws, 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	Amazon, Costco, CVS, Rite Aid, Target, Walgreens, Walmart
Electronics	Amazon, Apple, Best Buy, Costco, Kohl's, Macy's, Office Depot, Staples, Target, Walmart
Furniture/Home Goods	Amazon, Bed Bath & Beyond, Costco, Ikea, Kohl's, Macy's, Target, TJX, Walmart, Target
Groceries	99 Cents Only, Ahold Delhaize (Food Lion, Stop & Shop, Giant, and Hannaford), Albertsons, Aldi US, Amazon, Costco, CVS Health, Dollar General, Dollar Tree, Kroger, Loblaws, Publix, Rite Aid, Sobeys, Target, Trader Joe's, Walgreens, Walmart, Whole Foods Market
Home Improvement	Ace Hardware, Amazon, 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), 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](#). Small changes were made to improve the criteria in 2017 and again in 2018. Each of the criteria was assigned a maximum number of possible points, ranging from 0 to 17.5 points, weighted based on our best professional judgment as to its 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 possible score is 135 points. In 2018, we used the same curved letter grading system, going from F to A+, that was used in 2016 and 2017 (see the grading table on page 72).

We reviewed publicly available information reported by the retailers, including corporate social responsibility or sustainability reports, websites, news releases and blog posts, in the summer and early fall of 2018. We also reviewed official correspondence between the Mind the Store campaign, Campaign for Healthier Solutions, Getting Ready for Baby campaign, Environmental Defence Canada, and the forty retailers selected for evaluation. After an initial evaluation of the retailers, we sent each one its preliminary score along with a standardized letter, providing every company an opportunity to review our findings, disclose additional information, and/or make new public commitments to correct or improve the 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 met with them to review and discuss our findings. After receiving written input, we adjusted and finalized each score based on any new information that was disclosed. We also slightly refined and updated the scoring rubric to reflect some of the retailer initiatives and new commitments that did not cleanly fit within our initial criteria.

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 at the links on this page.

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

- [Factsheet](#)
Compare how the forty retailers scored across fourteen criteria (PDF download)
- [Scoring Rubric](#)
Learn about the fourteen criteria for the report (Excel file download)
- [2017 Report Card](#)
Download last year's Who's Minding the Store? retailer report card (PDF download)

Description of Actions Needed to Earn Maximum Points



Policy: Adopted a retailer safer chemicals policy

17.5 points

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 6 out of the 6 following elements:

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

**Our evaluation of restaurant chains only covers corporate chemicals policies on per- and polyfluoroalkyl substances (PFAS), bisphenol-A (BPA), and ortho-phthalates in food contact and food packaging materials as well as ortho-phthalates that are unintentionally introduced into the food itself throughout the supply chain.*



Oversight: Established management responsibilities and incentives

7.5 points

The retailer engages its employees, managers and/or directors in implementing its chemicals policy for product safety (beyond regulatory compliance) through all 3 of the following activities:

- Assigned a member of senior management with responsibility for chemicals policy;
- Ensures Board level engagement in chemicals policy; and
- Established financial incentives for senior management related to chemicals policies.



Accountability: Ensures supply chain accountability

10 points

The retailer engages in 4 out of 4 practices to assess and ensure supplier conformance with retailer chemicals policies or RSLs):

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



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

10 points

Full chemical ingredient information collected for all private- label and brand- name formulated products and articles OR, for restaurant chains, collected for all packaging, and generic material content collected for all articles (see definition of full chemical ingredient information in the glossary on page 74).



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

15 points

The retailer publicly reports on metrics in reducing and eliminating CHCs in past three years (since November 2015) across multiple product or packaging categories. Metrics include quantifying reductions of CHC by weight, number or percent of products or packaging containing CHCs or in which CHCs have been reduced, and/or number or percent of suppliers selling or reducing products or packaging containing CHC.



Safer Alternatives: Evaluates safer alternatives, avoids regrettable substitutes

10 points

Commissioned or required suppliers to conduct a credible hazard assessment, using detailed guidance, for alternatives to chemicals of high concern in products, packaging or operations; and has integrated retailer's criteria for a safer alternative consistent with MTS definition into private-label product development process.



Transparency: Demonstrates a commitment to transparency and public disclosure

15 points

Transparency around chemicals policy (7.5 points):

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

Transparency around consumer ingredient disclosure (7.5 points):

Retailer requires all suppliers of formulated products and articles to publicly disclose all ingredients online and on product packaging (if either is applicable), including fragrance ingredients, generic ingredients, contaminants, impurities, byproducts, allergens and nanomaterials.



Chemical Footprint: Evaluates its chemical footprint

7.5 points

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



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

7.5 points

Requires credible third-party safer chemicals certification (see glossary on page 74 for examples) in every relevant category of retailer private-label products and/or packaging going beyond regulatory compliance.

Extra Credit



Joint Announcement: Public commitment demonstrated through joint announcement

5 points

Participated in a joint public announcement 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

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



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

5 points

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



Collaboration: Actively participates in collaborative process to promote safer chemicals

5 points

Actively participates in a collaborative process to promote safer chemicals OR retains an independent expert institution (not a consulting firm) to assist in meeting the same goal (see glossary on page 74 for examples) OR created an external Advisory Board to collaborate with stakeholders to seek input into implementation of safer chemicals policy.



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

5 points

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

**** 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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