

May 21, 2019

Hubert Joly, Chairman and CEO  
Corie Barry, CFO  
Best Buy Co. Inc.  
7601 Penn Ave. South  
Richfield, MN 55423

Dear Mr. Joly and Ms. Barry:

**RE: Toxic Flame Retardants in Televisions Sold at Best Buy**

We appreciate Best Buy's commitment to sustainability and the adoption of its Chemical Management policy. **We are writing today to urge Best Buy to implement and expand this policy by phasing out the sale of electronics containing organohalogenated flame retardants (OFRs) and other toxic flame retardants, starting with televisions.**

A recent report, *TV Reality: Toxic Flame Retardants in TVs*<sup>1</sup>, found that TVs sold by Best Buy contain brominated OFRs at high levels. These toxic flame retardants are not chemically bound in the plastic and can readily leach out to contaminate the indoor and outdoor environment. Adults and children are then exposed to the chemicals when they ingest the contaminated house dust through hand-to-mouth activity and from indoor and outdoor air. OFRs have been found in fish, house dust, breast milk and even in newborn babies. Elevated levels of OFRs have also been found in workers in electronics recycling facilities, and a recent study found OFRs in dust in such a facility at levels nearly 100 times higher than in residential dust. Firefighters are also highly exposed to flame retardants and their toxic byproducts, with elevated flame retardant levels found in smoke and in fire station dust.

The flame retardants commonly found in televisions are linked to negative health effects, including hormone disruption and cancer. Studies have linked higher levels of the OFR deca-BDE in the home with greater incidence of thyroid cancer. A breakdown product and impurity in commonly-used TTBP-TAZ is a potent hormone disruptor and has been found to build up in placenta, where its presence is associated with altered thyroid hormone function.

The levels of flame retardants in television casings are typically present in percentage range, with our tests finding up to 33% by weight flame retardant in the enclosures. This substantial percentage of total enclosure weight results in very high volumes of flame retardant production and use, with production and use of just one flame retardant (DBDPE) in electronics reported at 50 to 100 million pounds per year. There are solutions in the replacement of these toxic chemicals with non-halogenated flame retardants or in changing in design of televisions so they can meet fire safety standards without the use of flame retardant chemicals.

Because of these serious health and environmental concerns, some of our organizations have been investigating the current flame retardant use in major television brands and are poised to release new follow-up testing in Best Buy private brand televisions in the months ahead.

---

<sup>1</sup> TV Reality: Toxic Flame Retardants in TVs. Available online: <https://toxicfreefuture.org/science/research/flame-retardants-tvs/>

**In the report *TV Reality: Toxic Flame Retardants in TVs*, the testing of TVs purchased from numerous retailers found:**

- Eleven of the 12 TVs contained flame retardants at very high concentrations of up to 33% of the weight of the plastic enclosure.
- Eight of the TVs contained flame retardants that are of high concern due to persistence, bioaccumulation, and/or toxicity. These included DBDPE, a close relative of the banned chemical deca-BDE, and 2,4,6-TBP, a hormone-disrupting chemical recently found at surprisingly high levels in placentas.
- Two of the TVs – one made by Element and one made by Samsung – contained the PBDE flame retardant deca-BDE, despite its being banned in five states and by governments around the world.
- Some manufacturers have avoided using flame retardants of high concern. The testing detected no flame retardants in one television (an Insignia Best Buy branded TV) and others contained very low concentrations and/or only flame retardants of moderate concern.

The TVs were made by 12 different manufacturers, including Sanyo, Samsung Element, Hisense, Sharp, TCL, Toshiba, Vizio, Sony, AOC, and Insignia, many of which that are commonly sold at Best Buy.

There is a growing consensus among leading scientists that OFRs constitute a dangerous class of chemicals. In response to a petition by environmental, health professional, consumer and firefighter organizations, the U.S. Consumer Product Safety Commission (CPSC) voted in 2017 to begin the rulemaking process banning products containing OFRs due to the serious risks these chemicals pose to human health, such as harm to the immune system, hormone disruption, children's brain development, and cancer. It also issued strong guidance warning the public of the hazards presented by OFRs in electronic casings, and requesting retailers and manufacturers to avoid the use of OFRs in their products. It states:

*"...In the meantime, based on the overwhelming scientific evidence presented to the Commission to date, the Commission has serious concerns regarding the potential toxicity of OFRs, and the risks of exposure, particularly to vulnerable populations, to OFRs, from the four categories of products listed in the petition. Accordingly, the Commission requests that manufacturers of children's products, furniture, mattresses, and electronics casings eliminate the use of such chemicals in these products. The Commission also recommends that, before purchasing such products for resale, importers, distributors, and retailers obtain assurances from manufacturers that such products do not contain OFRs. Finally, the Commission recommends that consumers, especially those who are pregnant or with young children, inquire and obtain assurances from retailers that such products do not contain OFRs."*

Governments around the world are increasingly acting on toxic flame retardants in consumer products. The European Union is expected to ban all halogenated flame retardants in the casings of televisions and other electronics this summer under the EU's ecodesign directive.

Major retailers of electronics like Best Buy can play an important role in working with their suppliers to eliminate OFRs and other toxic flame retardants and substitute them with safer alternatives. We specifically recommend Best Buy:

- Publicly disclose its existing Restricted Substance List (RSL) and Manufacturing Restricted Substance List (MRSL), as the company first pledged to do in October 2016;

- Expand Best Buy's RSL and MRSL to ban hazardous flame retardants, including OFRs, and other flame retardants that are GreenScreen Benchmark 1 chemicals, starting with televisions;
- Set clear benchmarks/timelines for reducing and eliminating these toxic chemicals in both private label and brand name televisions sold at Best Buy;
- Expand the restriction of organohalogenated flame retardants to other electronics sold at Best Buy over time;
- Ensure substitutes are safe. Require suppliers to identify safer alternatives (specifically those receiving GreenScreen Benchmark 2 scores and higher) and promote innovation by using materials that do not require flame retardants (e.g. non-flammable materials instead of plastic enclosures);
- Require suppliers to fully disclose to Best Buy identities and quantities of all flame retardants used; and
- Publicly report on progress annually.

As the largest retailer of electronics in the United States, Best Buy has the power and a moral responsibility to drive the adoption of solutions to the problem of televisions and other electronics that contain and emit dangerous chemicals. This will help meet the rising consumer demand for safer, healthier, and more environmentally preferable products.

**We would appreciate your response to our concerns and recommendations by June 21, 2019.**

Thank you.

Sincerely,

Mike Schade, Mind the Store Campaign  
Director  
**Safer Chemicals, Healthy Families**  
Brooklyn, NY

Laurie Valeriano, Executive Director  
**Toxic-Free Future**  
Seattle, WA

Deanna White, State Director  
**Clean Water Action Minnesota**  
**Healthy Legacy Coalition**  
Minneapolis, MN

Erica Dickerson, Executive Director  
**A Chance To Grow, Inc.**  
Minneapolis, MN

Pamela Miller, Executive Director  
**Alaska Community Action on Toxics**  
Anchorage, AK

Veri di Suvero, Executive Director  
**Alaska PIRG**  
Anchorage, AK

Kadineyse Paz, Environmental Health and  
Justice Organizer  
**Alliance for a Healthy Tomorrow**  
Boston, MA

Linda Reinstein, President  
**Asbestos Disease Awareness Org (ADAO)**  
Manhattan Beach, CA

Sharyle Patton, Director  
**Biomonitoring Resource Center,**  
**Commonweal**  
bolinas, CA

Karuna Jaggar, Executive Director  
**Breast Cancer Action**  
San Francisco, CA

Judy Levin, MSW, Pollution Prevention  
Director  
**Center for Environmental Health**  
Oakland, CA

Kathleen A. Curtis, LPN, Executive Director  
**Clean and Healthy New York**  
Albany, NY

Anne Hulick, CT Director  
Elizabeth Saunders, Massachusetts Director  
**Clean Water Action**  
East Berlin, CT and Boston, MA

Harriet Shugarman, Executive Director  
**ClimateMama**  
Ridgewood, NJ

Susie Davidson, Coordinator, Boston Chapter,  
Coalition on the Environment and Jewish Life  
**Coalition on the Environment and Jewish  
Life**  
Washington, D.C.

Crystal Rain, Program Associate  
**Conservation Voters for Idaho**  
Boise, ID

Gillian Z. Miller, Senior Scientist  
**Ecology Center**  
Ann Arbor, MI

Yomi Noibi, Executive Director  
**Environmental Community Action (ECO-  
Action)**  
Atlanta, GA

Muhannad Malas, Toxics Program Manager  
**Environmental Defence Canada**  
Toronto, ON, Canada

Michael Belliveau, Executive Director  
**Environmental Health Strategy Center**  
Portland, ME

Marcia Cooper, President  
**Green Newton**  
Newton, MA

Sue Phelan, Director  
**GreenCAPE**  
West Barnstable, MA

Charlotte Brody, RN, National Director  
**Healthy Babies Bright Futures**  
Charlottesville, VA

Vicki Nichols Goldstein, Founder & Executive  
Director  
**Inland Ocean Coalition**  
Boulder, CO

Steve Rivera, Board Member  
**Interfaith Worker Justice San Diego**  
San Diego, CA

Jaydee Hanson, Policy Director  
**International Center for Technology  
Assessment**  
Washington, DC

Steve Rivera, Board member  
**Interfaith Worker Justice San Diego**  
San Diego, CA

Maureen Swanson, Director, Healthy Children  
Project  
**Learning Disabilities Association of  
America (LDA)**  
Pittsburgh, PA

Beverly H Johns, President  
**Learning Disabilities Association of Illinois**  
Palos Hills, Illinois, IL

Tracy Gregoire, Healthy Children Project  
Coordinator  
**Learning Disabilities Association of Maine**  
Westbrook, ME

Martha Moriarty, Executive Director  
**LDA Minnesota**  
Golden Valley, MN

Katharine Chao, LDA/NJ HCP Coordinator 2nd  
Vice President  
**LDA-New Jersey**  
New Brunswick, NJ

Dr. Analisa L. Smith, President  
**Learning Disabilities Association of South Carolina**  
Irmo, SC

Diane Sixel, LDA-WI Vice President  
**LDA Wisconsin**  
Kiel, WI

Emily Scarr, Director  
**Maryland PIRG**  
Baltimore, MD

Jack Mitchell, Director of Health Policy  
**National Center for Health Research (NCHR)**  
Washington, DC

Marcy Goldstein-Gelb and Jessica Martinez,  
Co-Executive Directors  
**National Council for Occupational Safety and Health**  
Somerville, MA

Michelle Hughes, Executive Director  
**NC Child**  
Raleigh, NC

Brian Buzby, Executive Director  
**NC Conservation Network**  
Raleigh, NC

Monica Schrock, Program Director  
**Non Toxic Revolution**  
Los Angeles, CA

Daniel Rosenberg, Senior Attorney and  
Director, Federal Toxics Program  
**NRDC**  
Washington, DC

Raphaella Hsu-Flanders, Program Analyst &  
Engagement Manager  
**Oregon Environmental Council**  
Portland, OR

Nicole Fuller, Director  
**Philaposh**  
Philadelphia, PA

Shanna Devine, Worker Health and Safety  
Advocate  
**Public Citizen**  
Washington, DC

Sarah Doll, National Director  
**Safer States**  
Portland, OR

Ann Devlin, President  
**Saugus Action Volunteers for the Environment)**  
Saugus, MA

Kristi Marsh, Founder  
**Savvy Women's Alliance**  
Boston, MA

Sonya Lunder, Senior Toxics Policy Advisor,  
Gender, Equity & Environment Program  
**Sierra Club**  
Boulder, CO

Robin Schneider, Executive Director  
**Texas Campaign for the Environment**  
Austin, TX

Stiv Wilson, Campaigns Director  
**The Story of Stuff Project**  
Berkeley, CA

Mary Jones, Community Organizer for  
Western Massachusetts  
**Toxics Action Center**  
Boston, MA

Kara Cook, Toxics Director  
**U.S. PIRG**  
Washington, D.C.

Lauren Hierl, Executive Director  
**Vermont Conservation Voters**  
Montpelier, VT

Signe Benjamin, operations  
**Vineyard Conservation Society**  
vineyard haven, MA

Dorothy Wigmore, M.S.  
**wigmorising.ca**  
Winnipeg, Manitoba, Canada

James Schultz, Recording Secretary  
**WisCOSH, Inc.**  
Milwaukee , WI

Michelle Naccarati-Chapkis, Executive  
Director  
**Women for a Healthy Environment**  
Pittsburgh , PA