



Jeffrey Bezos, President, CEO, and Chairman of the Board  
Amazon  
410 Terry Ave North  
Seattle, WA 98109

October 24, 2019

**RE: Toxic flame retardants in televisions sold by Amazon**

Dear Mr. Bezos:

We appreciate Amazon's commitment to sustainability and the adoption of its Chemicals Policy to restrict toxic chemicals in private label products. We also appreciate Amazon's recent expansion of this policy to the EU and its efforts to ban the sale of paint removal products containing the chemicals methylene chloride and NMP. **We are writing today to urge Amazon to take the next step by expanding its Chemicals Policy to private label and brand name electronics.** In light of the recent Wall Street Journal investigation, Amazon must aggressively expand its policy to address a larger universe of products containing toxic chemicals.

Amazon's Chemicals Policy states:

***"Part of our commitment to quality is avoiding chemicals of concern in our products that can affect human health and/or the environment. We define chemicals of concern as those chemicals that: 1) meet the criteria for classification as a carcinogen, mutagen, reproductive, or other systemic toxicant; or 2) are persistent, bioaccumulative, and toxic."***<sup>1</sup>

Amazon's policy rightly identifies some of the hazard characteristics of chemicals that should be avoided in its products. We recommend Amazon implement this policy by phasing out organohalogen flame retardants (OFRs) and other toxic flame retardants in its Amazon Fire branded televisions and other televisions sold on Amazon.

A brand-new report we released today, *Toxic TV Binge*,<sup>2</sup> found that three Amazon Fire TVs (manufactured by Toshiba / Hisense) sold on Amazon contain OFRs in the plastic casings surrounding the TV. These OFRs meet Amazon's chemicals of concern criteria and should be restricted to comply with its new policy.

---

<sup>1</sup> <https://sustainability.aboutamazon.com/our-materials-and-commitments>

<sup>2</sup> <https://saferchemicals.org/wp-content/uploads/2019/10/toxic-tv-binge-october-2019.pdf>

TV Tested	Organohalogen Flame Retardants Found	Amazon Chemical of Concern Criteria
Toshiba Fire TV 43" 4KUltra HD  Toshiba Fire TV 50" 4kUltra HD  Toshiba Fire TV 55" 4kUltra HD	Decabromodiphenyl ethane (DBDPE) CAS # 84852-53-9	Very high persistence  High neurodevelopmental toxicity (based on similarity to deca-BDE)  Hormone disruption
Toshiba Fire TV 43" 4KUltra HD  Toshiba Fire TV 50" 4kUltra HD  Toshiba Fire TV 55" 4kUltra HD	1,3,5-Triazine, 2,4,6-tris(2,4,6-tribromophenoxy) (TTBP-TAZ) CAS # 25713-60-4	Very high persistence  Very high bioaccumulation  Impurity and breakdown product (2,4,6-TBP) is a hormone disruptor
Toshiba Fire TV 43" 4KUltra HD  Toshiba Fire TV 50" 4kUltra HD  Toshiba Fire TV 55" 4kUltra HD	2,4,6-tribromophenol (2,4,6-TBP)	Very high persistence  Bioaccumulative  Hormone disruption

There are numerous additional reasons for Amazon and its customers to be concerned about toxic flame retardants in televisions:

- They are present in large quantities in the plastic casing surrounding the TVs.
- They 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 and wildlife, house dust, breast milk, newborn babies, cats, and dogs.
- 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.

Amazon has an opportunity to innovate to sell televisions that are safer for your customers, who are clamoring for products free of dangerous chemicals. There are solutions in reach to replace these toxic chemicals with non-halogenated flame retardants. Suppliers can also change the design of televisions and meet fire safety standards without the use of toxic flame retardant chemicals. The state of Washington identified safer alternatives as far back as 2007: <https://fortress.wa.gov/ecy/publications/documents/0907041.pdf>

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. The CPSC also issued a warning to retailers and manufacturers to eliminate 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." (emphasis added)*

Additional regulation on organohalogens is moving forward around the world. TVs like these will soon be unavailable in the European Union (EU), which on October 1, 2019 passed an EU-wide ban on all organohalogen flame retardants in electronics casings that will take effect in 2021. In May 2019, the Government of Canada proposed a ban on the manufacture, import, use, sale, and marketing of DBDPE as well as products containing it. Canada took this action based on its conclusion that *"DBDPE is expected to contribute to the formation of persistent, bioaccumulative and inherently toxic transformation products, such as lower brominated diphenyl ethanes, in the environment."*

There is an opportunity for Amazon to get out in front of this regulatory curve, especially at a time when it recently expanded its Chemicals Policy to the EU.

Major retailers of electronics like Amazon must work with their suppliers to eliminate OFRs and other toxic flame retardants and substitute them with safer alternatives.

**We specifically recommend that Amazon take the following actions:**

- Develop a Restricted Substance List (RSL) and Manufacturing Restricted Substance List (MRSL) for private-label and brand name televisions by 2020;

- The RSL and MRSL should include toxic flame retardants, including OFRs, and other flame retardants that are GreenScreen Benchmark 1 chemicals;
- Establish a 1-year RSL phase-out timeline for Amazon Fire and other private label televisions and 2-year timeline for all other televisions sold on Amazon. The company should also continuously update the RSL based on new scientific data;
- While the phase-out is happening, warn your customers as requested by the CPSC, if televisions contain OFRs;
- Require suppliers to fully disclose any flame retardant chemicals used and challenge suppliers to use the safest, most sustainable materials that do not require flame retardants (e.g. non-flammable materials instead of plastic enclosures); and
- Publicly report on progress annually.

As a customer-obsessed company, Amazon has the market power and the responsibility to help drive the adoption of solutions to the problem of toxic chemicals in televisions and other electronics. This will help meet the rising consumer demand for safer, healthier, and more sustainable products.

We would appreciate your response to our concerns and recommendations by Friday November 29<sup>th</sup>.

Thank you.

Sincerely,



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



Laurie Valeriano, Executive Director  
Toxic-Free Future



Tom Hucker, Senior Advocate  
Natural Resources Defense Council (NRDC)

CC: Kara Hurst, Head of Worldwide Sustainability