



Edward Decker, Chair, President, and CEO
The Home Depot
2455 Paces Ferry Road
Atlanta, GA 30339

January 22, 2024

RE: Opportunity for Leadership to Address Toxic PVC Plastic in Building Materials and Packaging

Dear Mr. Decker:

We applaud The Home Depot's sustainability commitments over the last ten years to restrict toxic chemicals in your supply chain, from phasing out phthalates in flooring to banning methylene chloride and NMP in paint removal products to reducing polyvinyl chloride (PVC) plastic in packaging. These efforts have demonstrated The Home Depot's leadership in addressing toxic chemicals and plastics in building materials.

We are writing today to urge you to show leadership once again by phasing out the sale of PVC in building materials and packaging and advancing safer alternatives to PVC in your stores and supply chain. From production to use to disposal, PVC poses serious health risks to your customers, communities, and the environment.

Nearly one year ago today, train cars containing more than 100,000 gallons of vinyl chloride and PVC plastic derailed and were subsequently burned, setting off a major environmental health disaster that has sickened area residents and contaminated East Palestine, Ohio. This devastating incident is a painful reminder of the inherent dangers of making, transporting, using, and disposing of vinyl chloride and other chemicals to make PVC plastic.

Today we have published a [new report](#) highlighting the serious public health and environmental threats associated with the ongoing rail transport, air toxics, and climate impacts of vinyl chloride, to make PVC products sold at The Home Depot and other retailers. See enclosed for a brief summary of this report and PVC's hazardous lifecycle. This presents an opportunity for The Home Depot to show leadership in addressing a critically important sustainability challenge in its supply chain.

With great market power comes great responsibility and opportunity. The number one use of PVC is in building materials. As the largest home improvement chain in the U.S., The Home Depot can play a critical role in advancing solutions and promoting healthier indoor environments and communities by reducing and eliminating the use of this hazardous plastic in building materials and packaging. This would help the company not only implement and expand its safer Chemical Strategy but also realize its climate goals and mitigate growing business risks associated with the sale of PVC products and its use in packaging.

Phasing out PVC might seem like an impossible task. However, we can help you make strides in taking the first, meaningful steps to begin the process by working with you on tangible solutions that make sense for you and your customers - meeting budget and performance goals. Together, we can make quantifiable improvements in advancing safer, more sustainable products with some low-hanging fruit options.

Safer solutions to PVC are readily available, such as:

- linoleum flooring and other types of PVC-free resilient flooring;
- fiber-cement siding;
- recycled copper piping;
- thermofoil-free wood cabinetry;
- nonwoven wall coverings;
- PVC-free shower curtains; and
- recycled paper/cardboard packaging.

Given The Home Depot's market stature, your company is well-positioned to transform the building industry away from PVC and towards healthier materials that are safer for your customers and environment. We urge you to take the following steps:

1. **Engage and evaluate possible solutions:** Meet with our team so that we can exchange ideas and identify possible solutions. As we learn more about your barriers and opportunities, we can better assist in developing a roadmap. Healthy Building Network's [product guidance](#) is a great place to start to learn about safer product alternatives.
2. **PVC phase-out commitment:** Once short and medium-term solutions are identified, announce and implement a clear timeline to phase out PVC in building materials and to complete the elimination of PVC in both private-label and brand-name packaging.
3. **Increase and feature shelf space for safer alternatives:** In the interim, increase and promote the availability of safer alternatives to PVC in your stores, especially those identified as safer by Healthy Building Network's product guidance.
4. **Impact investment:** Invest financial resources to identify, develop, evaluate, and scale additional safer alternatives to PVC building materials and packaging.
5. **Educate your customers about safer alternatives:** Develop and launch a program to educate your customers, especially professional contractors, about the environmental health hazards of PVC and the benefits of alternatives.
6. **Advocate for PVC policy reform:** Lobby in support of governmental policies to ban PVC plastic and support the scaling of the production of safer, effective solutions at the state and national levels.

There is a growing business case to act. While The Home Depot has made some positive changes, there are still significant liabilities associated with hazardous chemicals and products in its supply chain. Due to PVC's hazardous lifecycle, the sale of PVC building materials and its use in packaging poses increasing regulatory, financial, legal, and reputational risks to the company. The environmental health impacts of

vinyl chloride have been covered extensively in the media and received front-page coverage in the *New York Times* and *USA Today* in the last year alone.

In response to PVC's toxic threats, governments and corporations all around the world have enacted or are considering policies to phase out PVC and switch to safer products. In 2023, six U.S. states introduced laws restricting PVC in packaging – CA, MA, ME, NC, NY, and RI. More recently, Washington State is considering regulating chlorinated chemicals such as vinyl chloride. At the federal level, in December 2023 the U.S. EPA announced it is considering whether to ban vinyl chloride under the Toxic Substances Control Act (TSCA). The European Chemicals Agency (ECHA) released a report this past November recommending regulatory action on PVC additives (e.g. *ortho*-phthalates, organotins, and flame retardants) and PVC microplastics across the EU.

The Home Depot has an opportunity to get out in front of these regulatory risks and phase out PVC, as other major businesses have done, such as Apple, HP, IKEA, Johnson & Johnson, Microsoft, Nike, and Samsung. And dozens of leading businesses have signed onto the US Plastics Pact, to eliminate PVC and other problematic packaging materials.

We request an opportunity to meet with you to discuss solutions to PVC. Together, we've achieved success in the past and we are confident we can achieve success on this critical issue. We look forward to your response. Thank you.

Sincerely,

The image shows two handwritten signatures in black ink. The signature on the left is 'Laurie Valeriano' and the signature on the right is 'Mike Schade'. Both signatures are written in a cursive, flowing style.

Laurie Valeriano, Executive Director
Mike Schade, Director, Mind the Store
Toxic-Free Future

CC: Candace Rodriguez, Senior Director – Sustainability

Enclosure: Summary of PVC environmental health impacts

Summary of PVC environmental health impacts

Globally, 99% of vinyl chloride is used to manufacture PVC plastic and vinyl chloride is classified as a known human carcinogen by The International Agency for Research on Cancer (IARC), the U.S. Department of Health and Human Services (HHS), and the U.S. Environmental Protection Agency (EPA). Our research has found that U.S. production of PVC plastic releases hundreds of thousands of pounds of carcinogenic vinyl chloride into the air every year. Vinyl chloride factories produce more than ten billion pounds of vinyl chloride in the U.S. to make PVC plastics often in low-income communities and communities of color. People living in these communities are much younger, more diverse, and earn far less than the national per capita income. Among the people living within a three-mile radius of these plants, 63% are people of color, compared to 41% nationwide. Residents of these areas earn an average of \$23,747 per capita, which is 37% below the national average of \$37,638.

[New research we published today](#), nearly one year after the East Palestine, OH vinyl chloride train derailment, found that an estimated 36 million pounds of vinyl chloride travels on more than 200 rail cars across nearly 2,000 miles of U.S. railways at any given moment. These shipments supply OxyVinyls and Orbia PVC plastics factories in New Jersey, Illinois, and Niagara Falls, Ontario. Over the course of a year, an estimated 8,595 rail cars carry approximately 1.5 billion pounds of vinyl chloride from OxyVinyls, the nation's top producer of the chemical, to these plastics plants. The rail shipment of vinyl chloride to make PVC plastic puts more than three million people at risk, including communities from Texas to New Jersey. OxyVinyls sells PVC to companies that make PVC building materials for retailers like The Home Depot. OxyVinyls supplies businesses like AHF, which makes Armstrong vinyl flooring in Pennsylvania and Illinois and sells Armstrong brand flooring through The Home Depot. As of late 2023, The Home Depot online catalog listed more than 50 styles of Armstrong vinyl flooring made in the U.S., under the brand names "Excelon Imperial" and "Bruce."

Vinyl chloride is among just one of a litany of highly hazardous chemicals used in the production of this plastic. Significant amounts of PFAS, asbestos, mercury, ethylene dichloride, dioxins, and other chlorinated byproducts are used or released during the production or disposal of PVC plastic. Exposure to these chemicals can cause cancer, reproductive harm, hormone disruption, and other serious health problems.

The production and disposal of PVC building materials and packaging not only pose serious health risks to communities but can expose your customers and employees to hazardous additives that can migrate out of the plastic contaminating indoor air, household dust, and water, posing health risks to vulnerable populations including infants, young children, and women of childbearing age. PVC is often filled with harmful additives such as *ortho*-phthalates, organotins, chlorinated paraffins, bisphenol A (BPA), lead, and or cadmium. Since these additives are not chemically bound to the plastic, they are released into air and dust and build up in indoor and outdoor environments as well as food. According to the CDC, close to 100 percent of U.S. residents have measurable levels of phthalates in their bodies, and approximately 90% of all phthalates are used to soften PVC plastic. Harmful volatile organic compounds (VOCs) can also off-gas from PVC products. One study found that more than 100 VOCs can be released into indoor air from PVC shower curtains.

The Home Depot's sale of PVC not only poses serious environmental health risks but also raises serious ethical questions about forced labor from PVC flooring products sourced from the Xinjiang Uyghur Autonomous Region (XUAR) of China. Over the last year, imports of PVC flooring have been halted at the

U.S. border by the federal government, posing significant supply challenges for The Home Depot and the flooring industry.

Now is a strategic time for The Home Depot to increase the availability of safer alternatives to PVC flooring in your stores, such as bio-based linoleum. Linoleum is considered safer as it is sourced mostly from bio-based and low-hazard ingredients, and functionally, linoleum flooring typically lasts longer in buildings compared to PVC flooring, making it a more sustainable option.

Taking action on PVC would also help The Home Depot realize its climate goals, as PVC plastic is sourced from climate-damaging petrochemicals, and the production of chlorine and other feedstock chemicals is highly energy-intensive. A recent report by the Center for Environmental Health documented the major climate impacts of manufacturing luxury vinyl tile (LVT) flooring. Researchers quantified the carbon dioxide equivalent emissions from producing this flooring, revealing manufacturers have been underreporting this by up to 180%.