

Key Findings

- UK retailers are adopting group-based approaches to restricting harmful chemicals.
- Many leading retailers have phased out bisphenols in receipts and have committed to phasing out PFAS from food packaging, ahead of UK legislation.
- Retailers see group-based chemical legislation as a positive way to minimise risks to human and environmental health, simplify compliance management and create a level economic playing field.

From Fidra's on-going work with some of the UK's leading supermarkets, food outlets and high-street retailers, we have seen an **increase in support for a group-based approach to chemical legislation**. The current substance-by-substance method of assessing and regulating chemicals has been widely recognised as inefficient and highly susceptible to regrettable substitution, leaving both human health and the environment vulnerable to harm. It penalises companies who take a proactive approach to chemical management by failing to provide a level playing field, and it places an unfair burden on companies who lack the capacity to futureproof their supply chains against continual regulatory change. As a result, **many retailers are now adopting group-based approaches to restricting chemicals in their own products**.

This report summarises retailer progress towards sustainable chemical management utilising examples from two chemical groups of concern, bisphenols and poly- or per-alkylated substance (PFAS). Fidra's findings are based on retailer engagement during 2020-2021, including an online survey¹, case studies, and on-going dialogue with retailers. For further information on results or methodologies please contact info@fidra.org.uk.

Bisphenols, the 'everywhere chemicals'

Bisphenols are a chemical group commonly used in plastics and thermal paper. Bisphenol-A (BPA) was banned from UK receipts in 2020 due to the health risks posed to the unborn children of shop workers². However, BPA is now commonly replaced with other bisphenols, most notably BPS³. Current research shows BPS to have similarly damaging effects to both people and the environment as BPA. The EU are now assessing BPS for classification as an endocrine disrupter⁴.

Bisphenol-free alternatives for receipts are readily available. As of September 2021, **7 out of 10 of the UK's major supermarkets told Fidra they were using bisphenol-free receipts**, with one other currently phasing in bisphenol-free stock. In Fidra's 2021 retailer survey¹, of those who had removed *all* bisphenols from their receipts, 100% listed **futureproofing against future legislation and human health impacts** as key motivations; 75% also listed environmental impacts as a key driver of internal policy change.

"We believe how we do business really matters. From our work to cut carbon, source sustainably and ensure all Co-op food packing is recyclable, through to bisphenol and phenol-free till receipts, we are committed to ensuring we have a healthy, sustainable natural environment to pass on to future generations."

Cathryn Higgs, Head of Food Policy, Co-op

PFAS, the 'forever chemicals'

PFAS are a group of over 4,700 chemicals used in a wide variety of everyday items. They are now internationally recognised for their extreme environmental persistence and support a growing evidence base of widespread toxicity amongst people and wildlife⁵.

Fidra have been working with the UK's leading supermarkets to encourage a phase out of PFAS in food packaging. As of September 2021, **50% of major UK supermarkets had committed to either reduce or remove intentionally added PFAS from their own brand food packaging**, with two major retailers aiming to eliminate intentionally added PFAS from own brand food packaging by 2022⁶. UK paper and board suppliers are also increasingly aware of PFAS in their products and actively engaged in developing and promoting PFAS-free materials⁷.

Retailer support for group-based legislation

Our case studies clearly demonstrate that many retailers now support, and are already adopting, group-based approaches within their own restricted substances lists and internal chemical policies.

In an online survey conducted by Fidra, major UK retailers who had already adopted group-based approaches, such as Waitrose, Sainsbury's, Co-op, McDonald's and Pizza Hut, stated that **improving environmental and human health protections, as well as futureproofing against further legislation**, were the primary motivations for going beyond the current single chemical restrictions.

Retailers consistently highlighted group-based legislation and greater transparency of chemical content from suppliers as important factors for simplifying their own chemical management.

The main barriers to change were identified as the **availability of alternatives, cost, and chemical transparency from suppliers**. These issues can all be addressed with legislative action that implements a precautionary approach, driving innovation of safer alternatives.

Retailers specified numerous benefits of group-based chemical legislation (see table below), again highlighting the protection of both health and environmental concerns, as well as avoiding costs associated with regrettable substitution and future legislation change. These findings highlight **a desire for long-term clarity and protection that can be achieved with group-based chemical regulation, suggesting a preference towards precautionary rather than reactive chemical management**.

"We are obliged to rely on the ethical practices of the chemical suppliers we use. We source reputedly to manage risk but in reality know very little about their approach."

Penny Manuel, Managing Director of SOHO Coffee Shops Ltd

"Legislation in the right area tends to force manufacturers to solve problems they otherwise might not, it also provides a level playing field for purchasing organisations and removes any barriers around commercial competitiveness.."

Steve Packer, Director, Pizza Hut Restaurants

Benefits retailers identified in taking a group-based approach to chemical legislation

- Minimises the amount of legislation and change to manage
- Reduces the cost of potential regrettable substitution
- Reduces risk of reputational damage from potential regrettable substitution
- Provides longer-term clarity on what chemicals are/are not considered as safe for use
- Provides better protection for health
- Provides better protection for environment

Recommendations

Fidra supports the commitments from retailers to reduce and remove harmful chemicals from consumer products. However, it is clear that comprehensive chemical legislation is still vital to assure retailers of the health and environmental safety of their products, to provide a level playing field and crucially to support smaller UK businesses that do not have the capacity to futureproof against multiple chemical regulation updates, nor the influence to demand change across their supply chains. **Fidra recommends the adoption of a group-based approach to chemical assessment and regulation in the UK.**

1. Preventing Chemical Pollution From Products Survey 2021, conducted by Fidra online via survey monkey, sent to 32 UK high street retailers, responses received July 2021- August 2021. <https://www.surveymonkey.co.uk/r/ZFRTDNR>
2. Regulation (EU) 2016/2235 [2] to restrict BPA in thermal paper to no more 200 mg/kg
3. ECHA The use of bisphenol A and its alternatives in thermal paper in the EU during 2014 -2022. DOI: 10.2823/592282
4. ECHA. Accessed September 2021: <https://echa.europa.eu/brief-profile/-/briefprofile/100.001.137>
5. PFASfree. The PFAS Problem. [Online] <https://www.pfasfree.org.uk/about-PFAS#thepfasproblem>
6. PFASfree. PFAS-free Food Packaging. [Online] <https://www.pfasfree.org.uk/pfas-free-food-packaging>
7. PFASfree. Resources for Retailers. [Online] <https://www.pfasfree.org.uk/current-initiatives/pfas-free-products/resources-for-retailers>