



Via Certified Mail  
And email: Tim.cofer@kdrp.com  
June 24, 2025  
Tim Cofer  
CEO  
Keurig Dr. Pepper  
53 South Avenue  
Burlington, MA 01803

NOTICE OF INTENT TO FILE SUIT UNDER PROPOSITION 65 AND CALIFORNIA  
CONSUMER LEGAL REMEDIES ACT

Dear Mr. Cofer,

Keurig plastic K-Cups are harmful to coffee-drinkers' health and to the environment. A report published in the *International Journal of Surgery* (March 2024) found that heating plastic poses a serious health risk because of microplastic pollution and other contaminants. Your products contain chemicals that are known to cause health risks including epichlorohydrin, polypropylene, Di-n-butyl phthalate, Bisphenol A and other harmful chemicals. Most of these chemicals are on the California Proposition 65 List of carcinogens.

I am giving you sixty-days-notice pursuant to The Safe Drinking Water and Toxic Enforcement Act of 1986 (Health and Safety Code section 25249.5 et seq.), also known as Proposition 65. Plastic also harms the environment by entering into streams, lakes and oceans. Fish and other wildlife ingest plastic particles from this packaging. Humans eat fish and other animals containing plastic from your containers. Your plastic harms human life and the environment. Further, your failure to notify consumers on your packaging that your products contain plastic constitutes an unfair and deceptive trade practice in violation of Section 17200 of the California Business and Professions Code.

I propose a settlement as follows:

1. Keurig will agree to either package its coffee in non-plastic containers (such as aluminum or cardboard) or place a proposition 65 notice on its packaging;
2. Keurig will compensate the California Association for Recycling All Trash with \$240,000 to monitor compliance for one year.

I look forward to working with you to improve the environment and make your coffee products safe to drink.

Sincerely yours,

Joel D. Joseph  
CEO