



Lauren Tamboer  
Hazardous Waste & Toxics Reduction Program  
Washington Department of Ecology

July 26, 2021

RE: Request for Appvion's input on regulations for bisphenols in thermal paper

Dear Ms. Tamboer,

Thank you for engaging with Appvion on the Washington Department of Ecology Safer Products Implementation. We appreciate the invitation to participate in the recent webinar and for you sharing the webinar materials with us.

Innovation is the key to developing new products that provide a sustainable future and Appvion's history shows our commitment to this philosophy. Appvion removed BPA from its products in 2006. We have developed two phenol free technologies available for purchase and continue to develop new unique phenol free chemistries. These new designs meet the demanding needs of our customers in terms of quality expectations for various applications. We anticipate that all of our products will be redesigned to be phenol free by 2025.

Regarding the alternatives that were discussed in the webinar, I have attached the Pergafast 201 Safety Data Sheet (SDS) from the supplier for your convenience. As you will note, Pergafast has an acute and chronic aquatic toxicity classification. The aquatic toxicity characteristic is likely to disrupt recycling, composting, or other end-of-life scenarios for the thermal material. Appvion's sustainability commitment and objectives have led us to avoid Pergafast 201. At Appvion, we hold human health and environmental sustainability a top priority during our product development.

We again thank you for engaging with Appvion.

Best regards,  
Michelle Miller

A handwritten signature in black ink that reads 'Michelle Miller'.

**Chief Sustainability Officer**