



Department of Ecology  
State of Washington

RE: Safer Products for Washington - Draft Report to the Legislature on Regulatory Determinations

Appvion, LLC has reviewed the WA State Draft Regulatory Determinations Report for Legislation and has the following comments regarding Chapter 4: Bisphenols:

Although Pergafast® 201 received a BM-2 score in the Green Screen™ assessment, we believe better alternatives exist. According to the Pergafast® SDS and EU REACH registration information, the material has an acute and chronic aquatic toxicity classification and high persistence in the environment. The aquatic toxicity and persistence characteristic is likely to disrupt recycling, composting, or other end-of-life scenarios for thermal products.

Appvion removed bisphenol-A from its products in 2006, and we are actively working to remove bisphenol-S. Appvion's sustainability commitment and objectives have led us to avoid Pergafast® 201. At Appvion, we have a comprehensive approach to assessing new product development and hold human health and environmental sustainability a top priority.

In the Fall of 2021, we introduced a phenol-free pharmacy prescription label application that is available for purchase and continue to develop new unique phenol-free chemistries for our tag, ticket, and label products. Appvion is committed to redesigning our portfolio to be phenol-free by 2025.

Appvion is pursuing GreenScreen® profile assessment of several developers being considered by our research and design team. We will be happy to share these results with WA State to be considered an alternative for thermal usage.

Best regards,  
Michelle Miller

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

**Chief Sustainability Officer**