



January 28, 2022

Safer Products Washington
Hazardous Waste and Toxics Reduction Program
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504

Re: Comments Regarding Bisphenol A/Bisphenol S and Thermal Paper

On behalf of the tag and label industry, (TLMI), I am writing to oppose elements recommended in the Safer Products Report, specifically the recommendations of future BPA and bisphenol use for paper receipts and thermal paper.

TLMI is supportive of the American Forest and Paper Association's (AF&PA) comments regarding the use of BPA and BPS and further requests that Dept of Ecology reconsider the recommendation pending further information.

The Department of Ecology asserts in broad statements that the use, disposal, and recycling of thermal paper contributes to bisphenol contamination in the environment, and that bisphenols are found in wastewater treatment plant effluent. However, no evidence is provided that the cause of such contamination is attributed specifically to thermal papers.

The U.S. FDA has recently asserted both BPA and BPS' use for food contact and other applications is safe for consumers at current exposure levels, with the exception of some products designed for infants and children (teething rings and similar). BPA and BPS concentrations found in direct thermal paper and receipts are found in lower exposure amounts than present in food and beverage applications.

Alternatives Identified by the Dept. of Ecology

The primary alternative identified by the Department, Pergafast201. Studies have shown that the use of Pergafast201 presents potential adverse health risks associated with aquatic toxicity, with indicators that it is toxic to aquatic organisms and persistent in the environment.

The U.S. EPA's *Bisphenol A (BPA) Alternatives in Thermal Paper* report assessment highlights that every chemical alternative to BPA, including Pergafast201, was found to pose 'High' or 'Very High' hazard in at least one health or environmental endpoint.

Specifically, the EPA's assessment stated that Pergafast201 is a moderate hazard to reproductive and developmental human health, and also highly toxic to aquatic organisms and may cause long-term adverse effects in the aquatic environment, rated as 'High' for Aquatic Toxicity and 'Very High' for environmental persistence.

Studies have found that thermal paper made with Pergafast201 was the most expensive alternative to BPA and BPS – as there is a single producer of the material. Its cost is in the range of 300% higher than currently used chemicals for direct thermal paper and paper receipts.

Currently, the availability of Pergafast201 and phenol-free paper constitutes only 10% of the market, also questioning the notion of widespread availability TLMI member companies and the broader paper and labeling industry.

The other alternative referenced in the Recommendations - digital or e-receipts - brings with it a host of cost, connectivity, and practical considerations for industry, particularly for labels used in the broader shipping markets.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Linnea Kean". The signature is written in a cursive, flowing style.

Linnea Kean
President