



environmental  
defence



**ACTION** CANCER DU SEIN DU QUÉBEC  
BREAST CANCER **ACTION** QUEBEC



**Safer Chemicals**  
**Healthy Families**

July 4, 2019

Name  
Position  
Company name  
Address Line 1  
Address Line 2  
Address Line 3

## **RE: The Need to Phase Out Receipts Containing BPA, BPS and all Bisphenols**

Dear Executive,

We are writing on behalf of retail workers and consumers across Canada and the United States. **We urge you to take immediate steps to stop using thermal paper containing bisphenols for receipts and other paper products in Canada.** Receipt paper containing bisphenol A (BPA), bisphenol S (BPS), and other bisphenols poses undue health risks to your retail workers who would have daily repetitive contact with receipts. It can also expose your customers to toxic chemicals that have been found to impede the healthy development of children and may increase the risk of certain cancers.

BPA is a hormone-disrupting chemical that can interfere with the critical function of hormones in the human body and has been found to damage fertility, harm the fetus, and cause adverse health outcomes including cancers of the breast and prostate, diabetes, and attention deficit hyperactivity disorder (ADHD) in children.<sup>1</sup> BPS is a similar bisphenol substance and hence is suspected to exhibit comparable hormone-disrupting effects and toxicity to reproductive health and development.<sup>2, 3</sup>

BPA is designated as a toxic substance under Canadian law. The seriousness of the risks associated with exposure to BPA compelled the Canadian federal government to ban

---

<sup>1</sup> European Chemicals Agency. (2019). Substance Information – BPA. Retrieved from: <https://echa.europa.eu/substance-information/-/substanceinfo/100.001.133>

<sup>2</sup> Rochester, J. R., & Bolden, A. L. (2015). Bisphenol S and F: a systematic review and comparison of the hormonal activity of bisphenol A substitutes. *Environmental health perspectives*, 123(7), 643-650.

<sup>3</sup> European Chemicals Agency. Substance Information - BPS. Retrieved from: <https://echa.europa.eu/substance-information/-/substanceinfo/100.001.137>

its use in baby bottles in 2010.<sup>4</sup> Notwithstanding, more than 90% of Canadians continue to be exposed to this toxic chemical from various consumer products including canned food and beverages and reusable plastic containers.<sup>5</sup>

According to new research by Environmental Defence Canada, cashiers and other retail workers who handle thermal paper regularly are likely being exposed to alarming levels of BPA and BPS every day.<sup>6</sup> **This research shows that body levels of BPA and BPS can increase more than a 100 times after handling receipts continuously for a duration equivalent of a full work day.** Exposure in cashiers and workers is likely to be even greater due to their continuous interaction with receipt paper and other factors including the frequent use of hand sanitizers.

As endocrine disruptors, these bisphenols pose greater risk to pregnant women and teenagers who are biologically more vulnerable to their damaging effects. The latest Statistics Canada Census data show that more than 250,000 women worked as cashiers in 2016 and more than 350,000 women worked in retail - the majority of whom are likely to be of childbearing age.<sup>7</sup>

Retailers have a responsibility to ensure that their employees are working in safe conditions and are protected from workplace chemical hazards. In the absence of adequately protective government regulations, action by retailers is more imperative.

Retailers have demonstrated strong leadership in reducing people's exposure to toxic chemicals. However, the continued use of bisphenol-coated receipts undermines the notable efforts by the retail sector to reduce people's exposure to BPA (e.g. voluntary removal of BPA from the lining of infant food cans and reusable drink bottles). In some cases, exposure to BPA and BPS from receipts may surpass average dietary exposures.

**With the continued use of these chemicals in thermal receipt paper, Canadian retailers face regulatory risk.** As regulatory agencies around the world, including Health Canada, continue to evaluate the health risks associated with BPA and BPS, these chemicals may face tougher restrictions and prohibitions in the near future. Your company has an opportunity to get out in front of this regulatory curve.

Canada's last risk assessments on BPA neglected workers' exposure from receipts and other sources and failed to address harmful substitution with other bisphenols such as

---

<sup>4</sup> Government of Canada. (2018). <https://www.canada.ca/en/health-canada/services/chemical-substances/challenge/batch-2/bisphenol-a.html>

<sup>5</sup> Government of Canada. (2017). Fourth Report on Human Biomonitoring of Environmental Chemicals in Canada: Results of the Canadian Health Measures Survey Cycle 4 (2014-2015). Available at: <https://www.canada.ca/biomonitoring>

<sup>6</sup> Environmental Defence Canada. (2019). The Hidden Cost of Receipts: How BPA and BPS find their way into our bodies. Available at: <https://environmentaldefence.ca/wp-content/uploads/2019/02/The-hidden-cost-of-receipts-BPA-BPS-Feb-2019-1.pdf>

<sup>7</sup> Statistics Canada. (2017). Labour in Canada: Key results from the 2016 Census. Available at: <https://www150.statcan.gc.ca/n1/daily-quotidien/171129/dq171129b-eng.htm>

BPS. Consequently, **federal regulatory actions have fallen short of protecting retail workers and undermined the creditable steps taken by many companies that have moved away from BPA in receipts only to unknowingly use a similarly harmful alternative.** The federal government has committed to fixing toxic chemical regulatory gaps in as early as 2020.

Furthermore, the European Union will ban BPA in receipt paper starting 2020 and is in the process of listing BPA as a Substance of Very High Concern, a regulatory designation that bans many of its uses. BPS is classified in the E.U. as toxic to reproduction and “suspected of damaging fertility or the unborn child”. In Canada, BPS has been queued for government assessment. Earlier this year, Switzerland banned both BPA and BPS in thermal paper and will require compliance starting next June.

**Retailers also face considerable reputational risks** as workers and consumers become increasingly more concerned about their exposure to these chemicals in receipt paper and demand action. Given the availability of safer alternatives, some leading retailers in North America have switched or started taking steps to transition to safer receipt paper. Conversely, ceasing the use of toxic thermal paper will generate positive media coverage for your company and customer support.

**We urge you to commit to ceasing the use of all bisphenols, including BPA and BPS in your receipts and other thermal paper by December 31, 2019.** As a leading retailer in Canada and employer of thousands of cashiers and other retail workers, your leadership on this issue will help tremendously in reducing workers' and consumers' exposure to harmful bisphenols.

Please note that our organizations are exploring further research and testing to better illuminate the real-world exposures to BPA and BPS experienced by cashiers in Canada.

We hope that you will take immediate steps to publicly commit to ceasing the use of toxic thermal paper and to transition to using a safer alternative. We would be delighted to offer assistance in helping you identify safer alternatives and interim solutions to reduce your workers' and customers' exposure to BPA and BPS.

We look forward to receiving a response to our letter by Tuesday August 6th and welcome an opportunity to speak in person or on the phone about our request and the issues outlined above. Please contact Muhannad Malas at 416-323-9521 ext. 241 or [mmalas@environmentaldefence.ca](mailto:mmalas@environmentaldefence.ca) to schedule further dialogue or if you have any questions about the points we raised in this letter. Thank you.

Sincerely,



Muhannad Malas  
Program Manager, Toxics  
Environmental Defence Canada



Derek Johnstone  
Special Assistant to the National  
President  
United Food and Commercial Workers  
Canada



Mike Schade  
Mind the Store Campaign Director  
Safer Chemicals, Healthy Families

Jennifer Beeman  
Executive Director  
Breast Cancer Action Quebec

