



# Safer Products for Washington

On July 1, 2023, a new rule for the Washington state Department of Ecology (WA DOE) went into effect under its Safer Products program: Chapter 173-337 WAC - Safer Products Restrictions and Reporting. The main goal of this rule is to reduce toxic chemicals in consumer products. Restrictions and reporting requirements for bisphenols in thermal paper was a priority in this rule and will begin as of January 1, 2026.

## What does this mean for businesses?

Starting January 1, 2026, businesses will need to file a report for products that consumers interact with that have certain intentionally added toxic chemicals listed in that Safer Products rule, which includes bisphenols. Direct Thermal paper falls under the scope of this reporting requirement if it contains bisphenols.

Businesses must comply with restrictions starting January 1, 2026, and file their first notification report by January 31, 2026, if they haven't already switched to an alternative solution that is compliant with the rule while keeping quality high and cost manageable.

## What is Appvion doing about it?

Continuing its innovation leadership with its patent-pending direct thermal chemistry which does not use phenolic developers, including BPS while maintaining high-quality performance with better contrast and fade resistance.

Transitioning its entire product portfolio to sustainable chemistries by the end of 2025 to be compliant with this regulation, thereby ensuring peace of mind. It's not just about compliance; it's about creating a better tomorrow.

Through rigorous testing and continuous improvement, Appvion has engineered a direct thermal paper coating that performs just as effectively, or better, than other products on the market, offering a safer and environmentally friendly choice made in the USA.



Ecological



Compliant



High-Quality

“I'm very pleased. I believe Appvion's phenol-free chemistry has better performance than competitive, phenol-containing products in the United States.” - Global Label Converter



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# How To Report To WA DOE

The information below is provided to help clarify the Washington state Department of Ecology (WA DOE) new rule that includes restrictions around bisphenols in thermal paper starting January 1, 2026.

## What should businesses do?

Businesses must not manufacture, sell, or distribute a consumer product that contains intentionally added bisphenols within the state of Washington. Direct Thermal paper falls under this reporting requirement if it contains bisphenols.

A business that has bisphenols in its product must submit a notification report to the WA DOE by January 31, 2026, in accordance with the reporting requirement, and annually thereafter by January 31st. Failure to comply may result in penalties or other enforcement actions.

Businesses must use an ecology-designated notification database to submit the required notification to the WA DOE if their product contains bisphenols. It's advised to use legal counsel that's familiar with WA DOE regulations to receive guidelines tailored to the company to ensure actions are compliant.

Additionally, the business may submit a revised notification to the WA DOE when their consumer product no longer contains any intentionally added restricted chemicals.

## What should be included in the report?

The notification must include information about the consumer product containing an intentionally added priority chemical that is sold or offered for sale during the prior calendar year. Manufacturers of products containing bisphenols are required to report to the WA DOE if their product exceeds 200 ppm. This reporting includes providing information on the chemical composition, quantities used, and potentially safer alternatives.

To ensure compliance, businesses must include the following: the name and CAS RN of the chemical; the product category that contains the chemical (the "brick" level of the GS1 Global Product Classification (GPC) standard); the product component within the product category (a uniquely identifiable material or coating that is intended to be included as part of the finished product); a description of the function of the chemical; the concentration range of each chemical in each product category (if multiple, report the highest concentration); and contact information (name and address of business); name, address, phone #, and e-mail of contact person at business; which person or entity the WA DOE will hold responsible for a complete, accurate, and timely notification report; and other info the business deems relevant.

Businesses can resubmit the data from the previous year's notification if they determine the information didn't change in the current reporting year.

Businesses are not required to submit a report including specific formulations or the specific name and address of the facility responsible for the use or addition of the chemical in the product.

