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Safer Chemicals
Healthy Families

Oct X, 2021

Michael Medline
President and Chief Executive Officer
Empire Company Limited
115 King Street
Stellarton, NS B0K 1S0

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

Dear Mr. Medline,

On behalf of the undersigned organizations representing workers, women and consumers concerned about exposures to hormone-disrupting chemicals known as bisphenols, we are urging Sobeys to phase out the use of bisphenol-coated receipt paper in all of the company's stores across Canada before the end of 2021.

Retail workers, especially cashiers, are exposed to high levels of bisphenol A and bisphenol S on the job every day. Alarming [research published by Environmental Defence](#) in 2019 revealed that frequently handling receipt paper during a regular shift at the cash register, used in conjunction with hand sanitizer, may elevate the level of bisphenol S upwards of 100 times.

As hormone disruptors, BPA and BPS can adversely interfere with the healthy development of the body. BPA has been linked to a range of serious health outcomes including obesity, diabetes, attention deficit hyperactivity disorder (ADHD) in children, and harmful impacts on the reproductive system. As a similarly structured bisphenol substance, BPS is widely considered a "regrettable substitute" for BPA and is increasingly found to pose comparable health harms.

Exposure to bisphenols in the workplace is not just an occupational health issue, it's also a women's health issue. These chemicals pose particular risk to women because of their ability to mimic estrogen, thereby increasing the risk of breast cancer and adverse effects on the fetus and children. Women face disproportionate exposure to these chemicals because they make up the majority of Canadians who work as cashiers. Statistics Canada Census data show that more than 250,000 women worked as cashiers in 2016 and more than 350,000 women worked as retail clerks.

The absence of regulations on the use of bisphenols in receipt paper should not be interpreted as an indicator of an absence of risk. Health Canada admittedly did not consider occupational exposures to these chemicals from receipts in the government's now outdated assessment of BPA carried out in 2008. The European Union, by contrast, has taken regulatory action on bisphenols in receipts, primarily because of the elevated levels of exposure experienced by cashiers and other workers.

Over the past two years, growing concern about worker exposure to these harmful chemicals has garnered extensive media coverage and resulted in leading grocery retail companies such as Loblaw Companies Limited, Costco Canada, and Metro Inc. to phase out receipt paper containing bisphenols. Their moves show that switching to non-bisphenol receipt paper is both possible and practical.

It is disconcerting that Sobeys has not taken similar steps or made public commitments to switch to bisphenol-free receipt paper. Continued delay will be seen by consumers, workers and women's health advocates as a disregard to the health of the company's essential workers and customers. Conversely, a public commitment by the company to phase out receipt paper containing hormone-disrupting bisphenols is likely to receive positive recognition of the company's action by civil society groups and in the media.

We urge Sobeys to take immediate steps in committing publicly to end the use of receipt paper containing bisphenol no later than December 31, 2021. We look forward to receiving a response to our letter and welcome an opportunity to speak about our request and the issues outlined above.

Sincerely,



Tim Gray
Executive Director
Environmental Defence



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



Jennifer Beeman
Executive Director
Breast Cancer Action Quebec



Mike Schade
Mind the Store, Campaign Director
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