

# FAQ's Domtar POS & Clarion

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## What are the Current Regulatory Requirements for Phenol-free thermal POS paper in the U.S.?

Regulatory requirements vary by state, but the national trend is moving toward eliminating all phenol-based developers in thermal paper. Key requirements include:

### California (Prop 65 and proposed AB1604)

- Businesses must avoid using thermal paper containing BPA or BPS, or apply warning labels as required under Prop 65.
- AB1604 (introduced) proposes a full ban on phenol-based thermal paper starting January 2028.

### Washington

- Regulation WAC 173337 bans all phenol-based thermal paper beginning January 2026.

### Connecticut

- Enacted a ban (SB 210) on BPA on receipt paper, extending enforcement to retailers and distributors.

### Domtar takeaway:

- U.S. states are phasing out phenols; distributors and retailers must align procurement with phenol-free solutions to avoid compliance risks.

## What Does “Phenol-free” Mean in the Context of Thermal Receipt Paper?

"Phenol-free" means the thermal coating contains no phenol-based chemical developers, including:

- BPA
- BPS
- All other bisphenol derivatives or phenolic compounds

Instead, phenol-free papers use alternative, nontoxic developers. For Domtar and its POS portfolio, “phenol-free” guarantees no detection of levels of phenols across the entire formulation, not just BPA substitution.

## How Does BPA-free Differ from BPS-free, and Why Does This Matter for Compliance?

### BPA-free

- Means BPA is not used, but BPS may still be present, which has similar structure, toxicity concerns, and endocrine disrupting potential.

### BPS-free

- Means BPS is absent, but products may still contain other phenolic developers or BPA unless explicitly removed.

### Why This Matters

Many businesses misunderstood early “BPA-free” labels, not realizing BPS was being used as a replacement with similar concerns.

States such as California and Washington have escalated rules to require elimination of both BPA and BPS, and in some cases all phenols, making simple “BPA-free” claims insufficient for compliance.

### Domtar implication:

To futureproof compliance, Domtar POS papers are phenol-free, not just “BPA-free.”

## How Does Clarion™ Thermal Paper Help Businesses Comply with Phenol Regulations?

Clarion™ thermal paper is engineered to meet modern regulatory requirements by eliminating intentionally added phenolic developers from its formulation.

### Clarion™ technology supports compliance with:

- BPA restrictions
- BPS restrictions
- Emerging phenol regulations
- Retailer sustainability standards

By using a phenol-free and No Phenols Added formulation, Clarion™ helps retailers align with both current legislation and anticipated regulatory trends.

## **Is Clarion™ BPA-free and BPS-free?**

Yes. Clarion™ thermal paper is manufactured without intentionally added BPA or BPS. Its formulation eliminates traditional bisphenol developers entirely.

This makes Clarion™ suitable for businesses operating in jurisdictions with strict bisphenol regulations, as well as those seeking to implement proactive environmental, social, and governance (ESG) initiatives.

## **How Does Switching to Clarion™ Reduce Regulatory and Liability Risk?**

Using Clarion™ thermal paper can help reduce risk by:

- Avoiding reliance on restricted substances
- Supporting defensible environmental claims
- Providing documentation for regulatory audits
- Reducing exposure to future bisphenol restrictions

As legislation increasingly shifts toward broader chemical class bans rather than single-substance bans, adopting phenol-free solutions like Clarion™ can serve as a long-term compliance strategy.

## **Does Clarion™ POS Meet the Phenol-Free Definition Being Used by CEH?**

Yes. The Center for Environmental Health (CEH) urges businesses to source “phenol-free” receipt paper to eliminate chemicals such as BPS and BPA. Clarion™ POS contains no intentionally added “Restricted Phenols” or “Other Restricted Substances” thereby meeting the definition proposed by CEH.

## **How Can I be Assured that Domtar’s Clarion™ POS paper Contains No Phenols?**

Clarion™ POS is formulated without the use of phenols, including BPA, BPS, and other bisphenols. All ingredients in Clarion™ POS have been verified by an accredited lab as containing no bisphenols.

Domtar has implemented rigorous control measures and third-party testing procedures to ensure that Clarion™ POS contains no detectable bisphenols.

