



environmental
defence



Mind
the
Store



Safer Chemicals
Healthy Families

July 16, 2018

Lee Tappenden
President and CEO
Walmart Canada
1940 Argenta Road
Mississauga, ON
L4N 1P9

RE: The Need to End the Sale of Paint Strippers Containing Methylene Chloride and NMP

Dear Mr. Tappenden:

On behalf of Safer Chemicals, Healthy Families, the Natural Resources Defense Council, Environmental Defence Canada, and our more than 3 million members and online supporters, **we are writing to request that Walmart Canada take immediate action to phase out the sale of paint removers that contain the chemicals methylene chloride and N-methylpyrrolidone (NMP)**. This action will close a significant gap in your health and safety policies and help to prevent additional fatalities and serious adverse health effects to consumers and workers caused by these toxic products.

The presence of methylene chloride (also known as dichloromethane) and NMP in your retail inventory undercuts your commitment to protect the environment and human health and safety, especially in light of the recent commitment by The Home Depot, Lowe's, and Sherwin-Williams to remove these products from their shelves in Canada and globally by the end of the year. Given the acute dangers and chronic hazards posed by methylene chloride and NMP-containing paint removers, and your market stature as a large-scale retailer of this product, we ask that Walmart Canada act to protect your customers by committing to remove these products from your stores globally by December 31st, 2018.

According to a U.S. government review, methylene chloride poses a higher risk for workers who may spend significant time indoors exposed to the chemical, such as those refinishing bathtubs. Because it is heavier than air, methylene chloride can settle in a tub or other indoor space and expose such workers to high concentrations of the chemical in a short period of time. Furthermore, government agencies found that air-purifying respirators (cartridge respirators) are inadequate for protection against methylene chloride exposure, because methylene chloride can penetrate most respirator cartridges.¹

As a result, many reported deaths associated with the chemical have occurred among professional contractors who were using the chemical to strip paint from a bathtub or floor when they collapsed and died shortly thereafter.^{2,3} In 2017 alone, at least two professional contractors died in the U.S. from working with paint strippers containing methylene chloride.

Use of these deadly paint removers has also proven fatal to do-it-yourself consumers. In February of this year, after purchasing a methylene chloride-containing paint-stripper available at a retailer, 31-year old Joshua Atkins died after inhaling fumes while refinishing his BMX bicycle. At least four

people have already died using these products during the last two years. Methylene chloride is linked to more than 60 known deaths in the United States since 1980.⁴ Further delay in removing these products from store shelves will inevitably lead to more deaths and is simply unacceptable.

NMP impacts fetal development and can cause miscarriage and stillbirth. According to estimates by the U.S. Environmental Protection Agency (EPA), each year 11,300 pregnant consumers and 160 pregnant workers in the U.S. face an increased risk of fetal death from exposure to NMP.⁵ Canadian women presumably face comparable risks. NMP has also been shown in toxicology studies to cause neurotoxicity, decreased fetal weight, kidney, and liver toxicity.

In the absence of regulatory action to restrict the use of these harmful chemicals in paint removers, your voluntary commitment to phase out these chemicals now is critically important.

The Canadian federal government has long recognized methylene chloride as a toxic chemical that poses significant risk to consumers and workers through paint removing products.⁶ However, the government has chosen to rely on voluntary guidelines to reduce potential exposures from these products in commercial settings, leaving significant regulatory gaps, particularly for consumer related uses.

More recently, a government scientific assessment also identified NMP-containing paint strippers as a source of risk for consumers, drawing on studies and conclusions by the U.S. EPA. However, the government assessment proposed a troubling conclusion that NMP should not be regulated under the federal toxics law. This is inconsistent with the European Union's approach, which has restricted NMP as a reproductive toxicant, effectively banning it in paint strippers, and the U.S. EPA's proposal to ban it. The Canadian government is currently considering the recent U.S. government proposal to ban the chemical and will publish its final decision in the near future.

In addition to the obligation of Walmart Canada to protect its customers from these safety hazards, your company has an interest in minimizing potential risk to its business. The continued sale of these products may pose significant reputational, regulatory, and legal risks.

The leadership of other major retailers such as The Home Depot, Lowe's, and Sherwin-Williams in protecting public health by removing methylene chloride and NMP-containing paint removers could impact Walmart Canada's public image. According to CAREX Canada, nearly 25,000 Canadian workers and 2 million consumers are exposed to methylene chloride annually.⁷ Moreover, drawing on EPA exposure estimates, tens of thousands of workers and millions of consumers may be exposed to NMP from NMP-containing paint strippers, which assessments show represent a major source of exposure to the chemical. Subsequent adverse health outcomes that could be caused by these products could generate negative media coverage, thus impacting the reputation of the Walmart brand.

Now is the time for Walmart Canada to evaluate its sale of paint strippers containing methylene chloride and NMP and challenge itself to phase them out in favour of safer alternatives.

Due to your market leadership position and growing concern about methylene chloride and NMP-based paint strippers, we respectfully request that you:

- 1. Cease sale of all paint stripping products containing methylene chloride or NMP from your shelves and website globally by no later than the end of 2018; and**
- 2. Work with us to encourage the rest of the retail and paint industry to do the same.**

