Health Care Without Harm Europe

Sustainable procurement criteria | Reusable textiles

These criteria have been drafted in collaboration with the medical textiles working group of the Healthcare Market Transformation Network (HMTN) to provide sustainability criteria and guidelines addressing priority sustainability issues associated with reusable textiles in the European healthcare sector.[1] Procurers are free to adapt these criteria as required, in line with their own policy and sustainability goals.

As well as a broad and balanced range of sustainability criteria, we encourage healthcare procurers to employ the best price-quality ratio (BPQR) in product selection.[2] This enables a tender to be evaluated against award criteria that include environmental and social criteria linked to the target of the contract. A price or cost criterion must also be included.

EU economic operators[3] must comply with relevant EU legislation for procuring medical devices, i.e. the Public Procurement Directive - PPD, REACH for chemicals, and the Medical Device Regulation - MDR. This document consolidates requirements under current legislation. Non-EU economic operators that do not fully comply with EU requirements should consider this document as a starting point that sets out required minimum criteria, representing a more comprehensive way of producing within social, environmental, and chemical requirements.

These criteria will be developed to keep pace with market developments and best practice. We will update this document based on feedback, market or regulatory changes, and new innovations. Please send feedback to europe@hcwh.org.

[1] Required criteria should be considered as minimum sustainability requirements while award criteria are additional, optional criteria.
[2] BPQR criterion must be formulated to allow contracting authorities to effectively verify information provided by potential vendors and if tenders meet that criterion.
[3] Manufacturers, authorised representatives, system/procedure pack producers, and importers.

Environmental criteria, materials, and supply chain management

Required criteria		
	Criteria	**Notes**
1	Vendors make Scope 1 and 2 greenhouse gas (GHG) footprints publicly available, covering all operations (headquarters and manufacturing), using a recognised methodology, which should be indicated. The vendor has set targets for GHG emissions reduction.	The production of textiles creates a significant climate and environmental impact throughout the value chain, including resource extraction, production, transport, and waste disposal.
2	The technical characteristics of textiles must be designed to increase the product lifetime, taking into account their shape, design, colours, prints, and other components. Any identification stickers must be easily removable so as not to damage the underlying fabric.	Prioritise third-party ecolabel certifications related to textiles, certified in European Union only.
3	Vendors should indicate all companies involved in dyeing, printing, or other finishing processes using chemical substances. Vendors should provide relevant declarations from subcontractors, based on safety data sheets for dyes or other blends used for the finished textile and component fibres.	
4	Reduce the volume of all synthetic fibres. Natural fibre products with a certification for sustainability should be prioritised to minimise the use of fossil fuel-derived synthetic fibres in textile value chains.	Prioritise third-party ecolabel certifications related to textiles, certified in the European Union only.
5	Cotton/natural fibre products made with conventionally farmed cotton or other natural cellulosic fibre shall not contain more than 0.05ppm of each of the following substances:	Nordic Swan Ecolabelling for Textiles 4.13- Natural fibres should be prioritised. These include vegetable fibres, such as: cotton, flax, ramie, hemp, jute, sisal, bamboo, coconut, and kapok. Cotton is easier to trace through certification systems, such as organic and fair trade cotton.

	• Aldrin • Captafol • Chlordane • Dichlorodiphenyltrichloroethane • Dieldrin • Endrin • Heptachlor • Hexachlorobenzene • Hexachlorocyclohexane (total isomers) • Trichlorophenoxyacetic acid	• Chlordimeform • Chlorobenzilate • Dinoseb and its salts • Monocrotophos • Pentachlorophenol • Toxaphene • Methamidophos • Methylparathion • Parathion • Phosphamidon • Glufosinate • Glyphosate	
Award criteria			
	Criteria		**Notes**
6	Vendors have a policy or plan that addresses GHG emissions reductions, including a dedicated carbon management lead for the organisation.		
7	Vendors' manufacturing sites are certified to a recognised environmental management standard, e.g. ISO 14040, ISO 14001, and ISO 14025.		
8	Vendors have a comprehensive and up to date environmental protection action-plan.		
9	Vendors provide third-party verified measurements of GHG emissions from across the full supply chain, including manufacturing processes and scope 1 and 2 emissions as minimum. Vendors specify the methods used, for example,		Scope 1 - Direct emissions from owned or controlled sources. Scope 2 - Indirect emissions from electricity generation, steam, heating and cooling consumed by the vendor.

	disclosure through the Carbon Disclosure Project (CDP) or using the Greenhouse Gas Protocol.	Scope 3 - All other indirect emissions that occur in a value chain. To make this criterion more accessible for SMEs it is possible to remove the requirement for a third party.
10	Vendors require Tier 1 suppliers to hold a carbon reduction policy with carbon reduction targets to manage the emissions from the product supply chain.	
11	Vendors provide certification or equivalent for GHG emission management systems that include product manufacturing processes.	
12	Vendors use 100% renewable energy in their manufacturing processes.	Renewable energy refers to: wind, solar, geothermal, ambient energy, tidal, wave, hydropower, landfill gas, and sewage treatment gas.
13	Vendors should include actions to reduce microplastic pollution. Source-directed interventions should be prioritised and if possible complemented by use phase actions. Vendors should be aware that tackling the use phase alone through proposals on use of filters will not be enough to reduce microplastic pollution. In addition, impacts such as consumers rinsing filters or filters ending up in landfill should be carefully considered and appropriate collection and recycling schemes identified. Source-directed interventions: ● Sustainable textile design, manufacturing, and laundry processes to address microplastic pollution at source. Vendors should reduce fibres that shed microplastics. Use phase actions: ● Use-oriented intervention: Best use practices, e.g. best laundering parameters, remediation technologies	*Policy Highlights to reduce microplastic pollution in water,* published by the OECD, highlights growing concerns of microplastics' impact on the environment and human health. Microplastics are fragments of plastic less than 5 mm in length, according to the European Chemicals Agency, microplastics are shed from clothing and other textiles, such as fishing nets, particularly during laundry and use. These are found in the environment as fragments, fibres, pellets, or beads of different sizes and physico-chemical compositions. Microplastic pollution originates from the manufacture, use, and disposal of products containing plastic polymers. Synthetic textiles are a significant source of microplastic pollution.

	(filters), eco-design requirements for washing machines and support for wastewater treatment. ● End-of-life: Waste management practices, e.g. sterilisation, to avoid waste entering the environment ● End-of-pipe capture: Enhance wastewater treatment to trap microplastics and prevent water pollution.	
14	Products should contain natural fibre (cotton, hemp…) originating from organically grown plantations, in compliance with Regulation (EU) 2018/848.	Indicate the articles offered with organic fibre, specifying their content, the company name of the producer(s) and the label. Products covered by the Ecolabel (EU) quality mark are also presumed compliant if they contain a sufficient organic cotton (or other natural fibre) content to obtain scores.
15	Products should be derived from recycled textile fibres or by-products deriving from industrial symbiosis (e.g. the textile fibre made from waste from the processing of oranges).	Design for recyclability through the restriction of certain material mixes and chemicals of concern which hinder the recycling process. Products should ensure that the full lifecycle of textiles is covered and measures are put in place to ensure the sustainable sourcing of raw materials, which must be based on data disclosed on CO_2 emissions, hazardous chemicals, water and land use, for each stage or process in the supply chain.
16	Products made from artificial textile fibres derived from cellulose (viscose, modal, lyocell, rayon, etc.) should be manufactured in plants whose atmospheric emissions of hydrogen sulphide are lower than 5 mg/Nm^3 or with sulphur emissions values (S) equal to or less than 30 g/kg for the staple fibre, or the continuous filament fibre of 40g/kg in the case of batch washing or 170 g/kg in the case of integrated washing.	Derivate fibres based on cellulose.

17	Repair and maintenance services: to increase the lifetime of products, technical points are assigned to the vendor that undertakes to provide repair and maintenance services for the products supplied.	The report published by ECOS summaries the ecodesign requirements in the circular approach of textiles. Ecodesign requirements for durability and reparability should refer to existing requirements for durability in the EU Ecolabel. The number of washes should be maximised to increase the product lifetime. Ecodesign requirements for textiles should ensure that durability is not achieved through the use of persistent hazardous substances.
18	For procurers without an internal laundry service, vendors offer laundry processes as well - i.e. providing textiles as a service.	

Packaging

Required criteria		
	Criteria	**Notes**
19	Packaging shall be reduced to the furthest extent possible. Homogenous materials are used in packaging to facilitate recycling.	
20	To reduce packaging waste, vendors minimise packaging whilst ensuring that it sufficiently prevents damage and preserves product integrity. Packaging must be appropriate for the size, shape, and weight of products.	If the product includes packaging, the vendor should specify and justify the use and amount of packaging, e.g. where sterility must be guaranteed.
21	Vendors prioritise product packaging that does not contain plastic and additives, and that is easy to recycle. Vendors avoid polycoupled plastic-paper, when possible.	Labelling must comply with CLP.

22	Vendors use packaging that easily allows the reclamation of mixed materials with minimum effort. Examples include avoiding bonding systems that prevent separation of individual materials or using labels that are recyclable or easy to remove to support recycling; alternatively use embossing or in-mould direct printing	All packaging must be compatible, and if necessary, justifiable with the minimum criteria that confirm the sterility of the product.
23	Packaging should be selected on the basis of its ease of recycling, if more than one packaging material satisfies the requirement for product protection.	
Award criteria		
	Criteria	**Notes**
24	Paper, carton, paperboard, and wooden pallets are Chain of Custody (CoC) certified under the Forest Stewardship Council (FSC) system or equivalent.	
25	Cellulose in packaging must be recycled, unbleached pulp or bleached without chlorine gas, according to the TCF or ECF method. The AOX (adsorbable organic halides) emissions to the recipient must not exceed 0.25 kg/tonne of pulp.	Chlorine bleaching pulp creates dioxins, furans, and related by-products that pose risks to human health and the environment.
26	Packaging has a high percentage of recycled content, without compromising performance.	

Chemicals: Toxic-free medical textiles

Chemicals should meet the criteria listed in *European healthcare's phase-out list for chemicals of concern*, a consolidated list of hazardous chemicals under REACH, developed by Health Care Without Harm (HCWH) Europe and leading European healthcare procurement organisations. Exemptions to the criteria will be made when safer alternatives do not exist and when specially requested in tenders for essential use.

The concept of essential vs. non-essential use could be adopted for determining when uses of such chemicals are not necessary (and can therefore be phased out), as well as the specific requirements for a substitute.

Clean Production Action's report, *Chemical Footprint of Products Commonly Used in Pediatric Departments*, defines chemical footprinting as the process of evaluating, through baseline data, the presence of hazardous chemicals in products, manufacturing processes, supply chains, and/or packaging. This has a crucial role in informing purchasing decisions for evaluating performance, benchmarking phasing-out hazardous chemicals, and moving to safer alternatives. Vendors should align their products with this phase out list and provide a chemical footprint analysis to adequately inform purchasers if products contain chemicals of concern.

Social Criteria

Required criteria		
	Criteria	**Notes**
27	Vendors map their full supply chains, including raw materials, to identify where there are potential risks of compulsory labour/modern slavery.	Documenting information across companies, suppliers, and individuals in the full supply chain identifies how and where vendors' products and services are produced, and by whom. It is a foundation for building a responsible sourcing program. Tier 1 –working directly with vendors. Tier 2 - providing Tier 1 with materials. Tier 3 - supplying Tier 2 or work in raw materials.
28	Vendors provide Code of Conduct/Modern Slavery audits for any factories producing their products that as a minimum assess health and safety, working environment, working conditions, human rights, and environment.	
29	Vendors report percentage of migrant workers at sites. Factories with more than 10% migrant workers must have policies to ensure zero recruitment fees and that workers are not deprived of passports or other ID. Vendor submit an audit of compliance.	
30	Upon request, vendors shall provide the addresses of all manufacturing sites used in supply chains.	
31	The contract must be performed in accordance with the International Labour Organization's eight core conventions covering forced labour, child labour, discrimination, freedom of association, and the right to organise. Vendors shall ensure that these conditions are met throughout the supply chain, including subcontractors.	

Award criteria		
32	Vendors report Code of Conduct audit results that are no more than two years old and performed by a third party in accordance with established methods such as SA8000, SMETA IV pillar, BSCI, or equivalent.	To make this criterion more accessible, it is possible to remove the demand for a third party; however, it must specify that the audit is for Code of Conduct, including as a minimum human rights and labour rights, in accordance with established methods. Whilst this might increase vendors' capacity to meet the requirement, it introduces a risk of lower reliability in audit findings.
33	Vendors report risks that have been identified through audits and explain how these risks have been addressed.	
34	Vendors ensure that their management and board are regularly informed of compulsory labour/modern slavery risks and are involved in related decision-making.	

Suggestions for market dialogue and innovation

Contract phase

This section covers some suggestions of obligations to be included in the contract to ensure that the environmental and social requirements are met throughout the contract. Contracts must be in accordance with the International Labour Organisation's eight core conventions, which address forced labour, child labour, discrimination, freedom of association, and the right to organise. Consider additional contract clauses:

- Set goals and timelines that require progress reports on achieving environmental and social criteria.
- Products manufactured in the EU or imported from third countries must comply with the requirements of European regulations. Medical products must have the CE marking once they have passed a conformity assessment.
- Monitor adherence to social and environmental requirements and address non-compliance with contract requirements, e.g. the buyer has the right to conduct scheduled or unscheduled audits.
- Require vendors to ensure that conditions are met by subcontractors who directly participate in the performance of the contract, regardless of the number of intermediaries. Vendors ensure that subcontractors participate in follow-up.
- Vendors report routines for systematic quality work as well as documented procedures and instructions to ensure that:
- Requirements for the product are fulfilled during the contract period.
- Documentation proving that the requirements are met is available.
- There is a contact person with the contracting authority.
- To ensure compliance with the above points, procedures and instructions should include:
- Monitoring and logging, e.g. regular inspection of raw material and product quality.
- Reporting and treatment of deviations related to the requirements.
- Reporting and documentation of production changes.
- Reporting, documentation, and handling of complaints.
- Traceability throughout the supply chain.
- Risk assessments of potential suppliers that address modern slavery before entering into production agreements.
- Risk assessments identify potential modern slavery risks and impacts that may be missed through audits.

Product, materials, and supply chain

These suggestions can be used as a basis for discussion with your suppliers about how the product and its supply chain can be further improved and what innovation is needed.

Production and use-phase

- Provide laundry and cleaning facilities, either on-site or off-site, in order to increase the number of times that a product can be reused.
- Re-design products for longer lifetimes.
- Reduce packaging as much as possible.
- Make products reusable, repairable and recyclable.
- Limit combinations/mixture of materials/chemicals, e.g. dyes and finishes, that are not compatible with recycling.
- Adopt technical solutions to reduce microplastics release from products.
- Reduce the amount of synthetic fibres entering water systems:
    - Change design/construction.
    - Modify laundering processes, e.g. filters in washing machines;
    - Efficient filters to capture fibres in wastewater treatment.
- Substitute chemicals if alternatives exist for better, safer devices. Addressing textiles specificities, prioritising substitution efforts and driving the elimination of hazardous chemicals.
- Chemicals that cannot be substituted should be addressed and treated through an appropriate waste management process at the end-of-life stage. Trace and disclose information regarding their use.
- Trace the supply of raw materials that are sustainably and ethically sourced.
- Product data sheets should include all chemicals being used at each stage of the production cycle.
- Shorten supply chains with more localised manufacturing.
- Optimise manufacturing to reduce materials, e.g. weight and thickness, while maintaining high performance standards.

End-of-life: to reduce residual waste

- Create circular systems[4] to recover and recycle products. Manufacture products that are easily recyclable, observing circular economy and extended producer responsibility principles. Design products for recycling.
- Commit to extended producer responsibility that allows the separate collection of product waste and its subsequent treatment through recycling (preferably) or another type of recovery. Vendors have responsibility for the end-of-life of their products.
- Innovate in recycling to create closed-loop systems[5], not 'downcycling'. Ensure that recycled products have market value.
- Tackle the challenges of an additional waste stream in hospitals.
- Life cycle methodologies and quality differ from manufacturer to manufacturer. Innovation is needed to improve, standardise, and strengthen LCAs.

Fibre type considerations

As highlighted by Nordic Swan Ecolabelling and the UK Department for Environment, Food and Rural Affairs, the environmental impacts of product life cycles vary with different fibre types; comparing products is therefore complex.

- Energy use - the production of synthetic fibres requires higher energy consumption than natural fibres, while cotton production uses higher energy consumption than other natural fibres.
- Water consumption - due to high water use during cultivation, cotton production uses more water than any other type of fibre. Regenerated cellulose fibres have relatively high water consumption due to pulp production, whereas other natural fibres and polyester have lower water consumption.
- Greenhouse gas emissions – connected to energy consumption. Synthetic fibres require significant amounts of fossil fuels as a raw material in polymer production.
- Effluent – dyes, finishing agents, traces of pesticides, and organic material are relevant parameters linked to effluent. Natural fibres, particularly wool, have the highest environmental impact because raw wool has high lanolin content.
- Chemicals are widely used within different production processes, e.g. polymers production, dyeing, chemical treatments and can also end up in effluent.

[4] HCWH Europe does not consider waste-to-energy a sustainable solution
[5] A closed-loop recycling system means that recycled material is used to create the same product