

October 14, 2024

Submitted electronically via: [www.regulations.gov](http://www.regulations.gov)

The Honorable Michael Regan  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, D.C. 20460

**Re: Update to EPA's Recommendations of Specifications, Standards and Ecolabels for Federal Purchasing; Notice of Availability and Request for Comment (EPA-HQ-OPPT-0835)**

Dear Administrator Regan,

Vizient, Inc. appreciates the opportunity to comment on the Environmental Protection Agency (EPA) Update to EPA's Recommendations of Specifications, Standards and Ecolabels for Federal Purchasing; Notice and Request for Comment (RFC). In the RFC, EPA announces the availability of and seeks feedback on the proposed additions to the Recommendations of Specifications, Standards and Ecolabels for Federal Purchasing (Recommendations) based on implementation of new eligibility criteria.

**Background**

[Vizient, Inc.](#), the nation's largest provider-driven healthcare performance improvement company, serves more than 65% of the nation's acute care providers, which includes 97% of the nation's academic medical centers, and more than 35% of the non-acute market. Vizient provides expertise, analytics and consulting services, as well as a contract portfolio that represents \$140 billion in annual purchasing volume. Solutions and services from Vizient improve the delivery of high-value care by aligning cost, quality and market performance. Headquartered in Irving, Texas, Vizient has offices throughout the United States.

**Recommendations**

Vizient is responding to the addition of certain ecolabels, certifications and standards in various product categories based on experiences with Vizient's [Environmental Sustainability Program](#) and Vizient's Environmental Advisory Council, which represents Vizient's healthcare system membership and reviews and approves a standard, ecolabel or certification that is recognized by the Environmental Sustainability Program. The Environmental Sustainability Program recognizes the following ecolabels, certifications and standards and we also support their recognition by EPA: Greenscreen Certified® Standard for Medical Supplies and Devices; Nordic Ecolabelling for Sanitary Products; My Green Lab Certification; ACT Ecolabel from My Green Lab; Nordic Ecolabelling for Textiles, Hides/Skins, and Leathers; Cradle to Cradle Certified Product Standard; Global Organic Textile Standard; OEKO-TEX Made in Green; OEKO-TEX Standard 100 and GreenScreen Certified® Standard for Furniture and Fabrics. Vizient encourages EPA to utilize these for Federal purchasing.

Also, Vizient appreciates the efforts of EPA in refining the criteria for an ecolabel, certification and standard to be recognized for Federal purchasing. We encourage EPA to clarify how it will

help ensure ongoing compliance with the eligibility criteria. EPA requested organizations to submit their ecolabel, certification or standard on or before December 31, 2023 to demonstrate compliance with the eligibility criteria; however, it is unclear how EPA will be ensuring conformance to the eligibility criteria that organizations must meet as it relates to their ecolabel, certification and standard beyond the initial application process, and whether EPA will verify that organizations are appropriately vetting suppliers to ensure criteria for the ecolabels, certifications or standards are being met. Vizient believes such clarifications will help enhance transparency and could also potentially encourage more organizations to request their standards, ecolabels or certifications be voluntarily reviewed by EPA.

## **Conclusion**

Vizient thanks EPA for the opportunity to comment on their efforts to assess environmental performance standards, ecolabels and certifications for Federal purchasing.

Vizient membership includes a wide variety of hospitals ranging from independent, community-based hospitals to large, integrated health care systems that serve acute and non-acute care needs. Additionally, many are specialized, including academic medical centers and pediatric facilities. Individually, our members are integral partners in their local communities, and many are ranked among the nation's top health care providers. In closing, on behalf of Vizient, I would like to thank EPA for providing us the opportunity to comment on this important RFC. Please feel free to contact me, or Jenna Stern at [jenna.stern@vizientinc.com](mailto:jenna.stern@vizientinc.com), if you have any questions or if Vizient may provide any assistance as you consider these recommendations.

Respectfully submitted,



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Vizient, Inc.