



How Health Care Purchasing is Addressing Problematic Chemicals

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Health Care Without Harm Mission

- To transform the health care industry worldwide, without compromising patient safety or care, so that it is ecologically sustainable and no longer a source of harm to public health and the environment.



Relevant HCWH Goals

- Create markets and policies for *safer* products in health care.
- Ensure *full access* to information about chemicals used in health care.
- Minimize the *toxicity* of health care waste.



HCWH Partners

- Large health care purchasers
 - Group Purchasing Organizations
 - Large health care systems
- Our four largest partners each contract for \$5 Billion to \$20.7 billion worth of goods and services annually.



HCWH Assistance

- HCWH is grant-funded to assist large health care purchasers with environmental purchasing, providing:
- Alternatives identification and evaluation.
- RFP specifications.
- Vendor questionnaires.



Traditional Environmental Purchasing

- Addresses known issues and targeted chemicals, for instance:
 - Methylene-chloride-free paint stripper.
 - Lead-free wheel weights.
 - Mercury-free laboratory fixatives.
 - PBDE-free electronics.



Potential Results of Traditional Environmental Purchasing

- Methylene-chloride-free paint stripper can contain neurotoxin.
- Mercury-free laboratory fixatives can contain zinc.
- Some lead-free wheel weights contain mercury.
- PBDE-free electronics may contain TBBPA, Dechlorane Plus, and/or other persistent HFRs.



Data Gaps: Lack of Chemical Information Handicaps Product Evaluation

- When evaluating products, purchasers can't know if the alternative is better unless they have full ingredient disclosure and sufficient **chemical testing information on the alternative.**
- Often both are unavailable.



Purchasers are Beginning to Addressing Data Gaps

- Some of our partners are starting by asking general questions about:
 - Full ingredient disclosure.
 - SIDS testing of ingredient/constituents.
 - Chemical groups, such as halogenated organics.



Standard RFP Question

from Kaiser Permanente

- Can supplier deliver to KP an estimate of the percentage of the chemical components of your product and packaging for which basic toxicity testing has been done? Basic toxicity testing is defined as sufficient to qualify under the Organization for Economic Cooperation and Development Screening Information Dataset (SIDS) for High Volume Production (HPV) Chemicals.



Vendor Questions

being considered by a GPO

- For what proportion of the chemicals and materials used in the products offered on this contract have you determined the extent of toxicity testing and evidence for persistence and bioaccumulation?
- Do you publicly disclose full ingredient and materials lists for all your products?



How Can Vendors Answer These Questions?

- Vendors are often unable to obtain answers to these questions from the manufacturers of the products they sell.
- Vendors have told us they want a central source for chemical toxicity testing information.



How our Partners and their suppliers may use HPVIS

- Look up a chemical to determine:
 - Whether testing is complete; or
 - Whether test data indicate red flags (P, B, or T); or
 - In which products this chemical might be used.



Importance of HPVIS: Example of Dechlorane Plus

- Even though Dechlorane Plus submission is inadequate in many ways, the submission indicates that Dechlorane Plus is:
 - Persistent.
 - Bioaccumulative.
 - Has inadequate toxicity data.



HPVIS Proposed Improvement: Simple Data Summary Table

	Data Gap	Sponsor information submitted	EPA Comments	ED Comments
Photodegradation	N	>24 years		
Stability in Water	Y	Stable (qualitative)		
Aerobic Biodegradation	N	Minimal or none		
Anaerobic Biodegradation	Y			
Bioaccumulation	N	Yes in fish		
Acute Toxicity to Fish	N	TL50>100ppm	Not adequate, but no further testing needed.	Not adequate, further testing needed.
Inhalation (LOAEL)	N	0.640 mg/L	Not adequate	
Oral feed (NOAEL)	N	100,000 ppm	Not adequate	Not adequate
Acute Toxicity	N		More information must be provided.	



HPVIS Inadequacy: Accessibility of Comments

- Test result **summaries** do not include even basic comments such as whether EPA found this test adequate.
- **Searching** for chemical from main HPVIS page does not provide link to comments.
- Comments provided in **prose** form, not in context with test results.



Accessibility and Arrangement of Information

- Chemical use information should be easily accessible to lay user, not buried in non-searchable prose documents.
- HPVIS should inform users how to link to other HPV SIDS databases (OECD, ICCA, etc.) to find chemicals not in HPVIS .
- HPVIS Query Engine should make it easier to compare chemicals to each other.



HPV Program Inadequacy: Enforcement of Testing

- EPA found inadequacies with Dechlorane Plus submission.
- According to HPV website, OxyChem did not amend the test plan.
- No tentative completion dates for new testing given.
- No indication that OxyChem did not respond is given except that new plan is not present.



Other HPVIS Problems: Searching for Chemicals

- Common synonyms/trade names (Dechlorane Plus) not searchable.
- Robust Summaries and Test Plans chemical list does not have CAS number, especially problematic since synonyms are not searchable.
- Dechlorane Plus listed as so under Robust Summaries and Test Plans chemical list but that name is not searchable in HPVIS.



Conclusions

- HPVIS is somewhat useful for health care purchasers and suppliers but could be made more useful by:
 - Moving information now only in prose, non-searchable documents into easily accessible tables.
 - Requiring and posting responses and amended test summaries from sponsors.
 - Improving technical problems with searching, chemical names, CAS number inclusion and limited document availability through search results.