

**Policy Title:** Sustainable Procurement Policy (redacted version)

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**Departments Affected:** All Departments

## I. PURPOSE

- A. Stanford Medicine Health Care (SHC), Stanford Medicine Children’s Health (SCH), and Stanford Medicine Health Care Tri-Valley (Tri-Valley) are committed to achieving carbon neutrality, conserving resources and energy, eliminating unnecessary waste, reducing exposures to harmful chemicals, and incorporating healthy materials in the delivery of care through innovative, science-based decision-making for patient, visitor, and employee safety.
- B. [Redacted]

## II. POLICY

- A. The Sustainable Procurement Program is governed by Stanford Medicine’s sourcing and procurement P.R.O.C.E.S.S., which emphasizes **P**urchasing **R**eliable products and services that are **O**utcomes-focused (Value = Quality/Cost), **C**ustomer-oriented, and from **E**quitable, diverse, and **S**ustainable **S**ources.
- B. This policy requires that all purchasers, suppliers, and products adhere to the Sustainability Principles set forth below, which define **Sustainable Sources** in the P.R.O.C.E.S.S. framework.
- C. [Redacted]
- D. [Redacted]
- E. Selection strategies
  1. Purchasers must follow product category level Sustainability Procurement Guidelines, if available. See Appendix A.
  2. Purchasers should consider a product’s entire lifecycle in selecting products (e.g., energy use, recyclability).
- F. Exceptions
  1. [Redacted]
  2. Exceptions will be reviewed semi-annually by SHC’s and SCH’s Sustainability Program Offices (SPO) to determine effectiveness and compliance with this policy.

## III. DEFINITIONS:

- A. **Circular Economy:** A model of production and consumption that involves reducing material use, redesigning materials, products, and services to be less resource intensive, and recapturing waste as a resource to manufacture new materials and products.
- B. **Exception:** An instance in which the Sustainability Principles are not followed for one or more of the reasons allowed for in the policy.

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- C. Fenceline community: A neighborhood that is immediately adjacent to a highly polluting facility and is directly affected by the operations and emissions of the facility.
- D. Manufacturer: A person or company that creates a product from raw materials or other goods.
- E. Procurement: The act of sourcing or purchasing a product or service.
- F. Product: A thing that is produced or grown to be sold.
- G. Purchaser: A person who buys a product or service.
- H. Reposable: Designed for multiuse prior to disposal.
- I. Scope 1 emissions: Direct greenhouse (GHG) emissions that occur from sources that are controlled or owned by an organization (e.g., emissions associated with fuel combustion in boilers, furnaces, vehicles).
- J. Scope 2 emissions: Indirect GHG emissions associated with the purchase of electricity, steam, heat, or cooling.
- K. Scope 3 emissions: Indirect GHG emissions that occur because of an organization’s business operations, but from sources that are not owned or controlled by the organization, such as supply chain, transportation, product usage, or disposal. The scope 3 emissions for one organization are the scope 1 and 2 emissions of another organization.
- L. Sustainability: The idea that products and services should be made in ways that do not damage the environment or use resources that cannot be replaced.
- M. Supplier: A person or company that provides a product or service to another entity.

**IV. SUSTAINABILITY PRINCIPLES**

- A. Reduce Greenhouse Gas Emissions
  - 1. Purchasers will prioritize products from suppliers that conduct and report on a greenhouse gas inventory at least every two years using international protocols.
  - 2. Purchasers will prioritize products from suppliers that measure, track, and set reduction targets for their Scope 1 and 2 emissions and report on progress toward these targets.
  - 3. Purchasers will prioritize products from suppliers that actively reduce, or have a plan in place to reduce, greenhouse gas emissions from Scope 1 and Scope 2 emission sources through carbon reduction practices and projects, and report on progress toward these emissions reductions. As a long-term strategy, the use of carbon offsets, carbon credits, or other financial tools alone, as a means for reducing Scope 1 or Scope 2 emissions, does not qualify under this principle.
  - 4. Purchasers will provide additional consideration to products from suppliers that measure, track, and work to reduce their own Scope 3 emissions.

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**Departments Affected:** All Departments**B. Incorporate Healthy Materials**

1. Purchasers will prioritize products that contain chemicals with inherently low hazard potential, eliminate chemicals of concern as defined in Appendix B, and minimize exposure when hazards cannot be prevented.
2. Suppliers are expected to know and be able to report the substances associated with and used in their products and packaging across their lifecycle. Purchasers may request product ingredient information from suppliers to assess and understand the impact of a product on human health, the environment, and fence-line communities, defined as communities within the immediate vicinity of product manufacturing.

**C. Design for a Circular Economy**

1. Purchasers will prioritize products that are reusable, reposable (designed for multiuse prior to disposal), reprocessible, recyclable, or that can be repurposed.
2. Purchasers will prioritize products from suppliers that offer a Take Back Program for product or packaging reuse or recycle or for product refurbishment.
3. Purchasers will prioritize products from suppliers that provide clear instructions for responsible disposal of products containing batteries or electric wiring to avoid disposal of products into municipal or regulated medical waste bins.
4. See Appendix C for detailed waste reduction requirements.

**D. Promote Energy and Water Efficiency**

1. Purchasers will prioritize products from suppliers that incorporate energy and water conservation practices.
2. Purchasers will prioritize ENERGY STAR and EPEAT (Electronic Product Environment Assessment Tool) Gold certified products.
3. Purchasers will prioritize products that meet the U.S. Environmental Protection Agency's WaterSense certification criteria.

**E. Prioritize Local and Regional Manufacturers**

1. Purchasers will prioritize local and regional manufacturers to help reduce carbon emissions and encourage investment in neighboring communities.
2. If local or regional manufacturing is not an option, purchasers will prioritize products manufactured in the United States.

**V. RESPONSIBILITIES**

- A. SHC's and SCH's Sustainability Program Offices (SPO) are responsible for ensuring that the Sustainability Principles are updated to reflect best practices.

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- B. Supply Chain and/or SPO will manage and monitor adherence to the Sustainability Principles implemented across SHC, SCH, and Tri-Valley, aligned with the balanced decision-making requirements of P.R.O.C.E.S.S.
- C. All employees will receive annual education on the Sustainable Procurement Program as one part of P.R.O.C.E.S.S.
- D. Department leaders will ensure coordination, communication, and appropriate integration of improvement and planning to support the Sustainable Procurement Program.

**VI. COMPLIANCE**

[Redacted]

**VII. APPENDICES**

- A. Appendix A: Sustainable Procurement Guidelines
- B. Appendix B: Chemicals of Concern
- C. Appendix C: Waste Reduction

**VIII. RELATED DOCUMENTS/PROCEDURES**

- A. Stanford Health Care Food Services Environmental Purchasing Policy
- B. Mercury Reduction and Elimination Policy
- C. Energy Management Policy

**IX. DOCUMENT INFORMATION**

[Redacted]

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## APPENDIX A: Sustainable Procurement Guidelines

### I. PURPOSE

The purpose of this document is to provide Sustainable Procurement Guidelines (SPGs) for Stanford Medicine Health Care (SHC), Stanford Medicine Children’s Health (SCH), and Stanford Medicine Health Care Tri-Valley (Tri-Valley). The SPGs provide detailed guidance at the product category level, in alignment with the Sustainability Principles. All products must comply with regulatory and accreditation requirements.

### II. PRODUCT GROUPS

The SPGs are organized into four groups, each containing a number of product categories:

#### A. Product Group 1

1. Food Services
2. Cleaning Supplies and Equipment
3. Medical Device Disinfectants and Sterilants
4. Patient Equipment
5. Waste Management

#### B. Product Group 2

1. Logistics – Freight/ Courier
2. Furniture
3. Maintenance, Repair, & Operations (MRO)
4. Engineering and Capital Equipment
5. Construction and Capital
6. Office Supplies

#### C. Product Group 3

1. IT Equipment
2. Bio-Medical Equipment
3. Print Management

#### D. Product Group 4

1. Lab Supplies
2. Medical Supplies
3. Pharmacy Supplies

### III. Product Group 1

#### A. Food Services

##### 1. Sustainable Purchasing Guidance

- a. SHC, SCH, and Tri-Valley prioritize the following sustainability principles when purchasing food:

- i. Fresh, seasonal, and local: strive to source fresh, peak-of-season ingredients from farms practicing sustainable operations.

- 1) Local is defined as within 250 miles.

- ii. Climate-resilience: support farms that plant a diverse number of crops, as opposed to monoculture, and employ agroecological methods of farming. Support farms and ranches that embrace regenerative agricultural practices.
- iii. Whole, minimally processed foods: serve whole ingredients and work to reduce processed foods in our kitchens and operations.
- iv. Less meat, better meat: strive to reduce meat and increase vegetables and plant-based ingredients.
  - 1) Increase the ratio of plant-based foods on every plate.
  - 2) Source animal products from farms and ranches that practice good animal husbandry and environmental stewardship.
- v. Beef and Poultry, with the following attributes:
  - 1) Antibiotic Free and Hormone Free
  - 2) Grass Fed / Free Range (Pasture Raised)
  - 3) USDA Organic
  - 4) Non-GMO Certified
- vi. Seafood, with the following attributes:
  - 1) Monterey Bay Aquarium Seafood Watch Best Choice or Good Alternative Listing
  - 2) Marine Stewardship Council certification
- vii. Eggs & Dairy, with the following attributes:
  - 1) Cage Free
  - 2) rbGH-Free /rBST-free (recombinant bovine growth hormone)
- viii. Vegetables, with the following attributes:
  - 1) Locally-sourced and seasonal
  - 2) Organic


## **2. Zero Waste Food Service Guidance**

- a. SHC, SCH, and Tri-Valley Food Services Departments implement zero waste best practices via the following initiatives:
  - i. Measurement and analysis of purchasing history and usage to optimize procurement decisions and minimize waste.
  - ii. Efficient use of ingredients during food preparation.
  - iii. Donation of daily meal surplus to local food distribution organization.
  - iv. Use of single-use service ware that is certified compostable by the Biodegradable Product Institute (BPI) or the Compost Manufacturing Alliance (CMA) and reusable service ware made from lead-free ceramic, glass, stainless steel, polyethylene, or polypropylene.
  - v. Compost collection of all post-consumer food waste and service ware.
  - vi. Collection of pre-consumer compostable and recyclable materials from kitchen and food services areas.
  - vii. Preference for food and beverage packaging that avoids single-use plastics.

**B. Cleaning Supplies and Equipment**

**1. Cleaning and Facility Maintenance Chemicals**

- a. SHC, SCH, and SHC Tri-Valley prioritize products certified by one of the third-party programs listed in III.B.1.c. when making purchases for the following product categories:
  - i. general purpose cleaners,
  - ii. bathroom cleaners,
  - iii. general floor care and carpet cleaners,
  - iv. upholstery cleaners,
  - v. window and glass cleaners,
  - vi. floor strippers and finishes, and
  - vii. laundry and dish soap.
- b. For other cleaning and facility maintenance chemicals, products certified by one of the third-party programs listed in III.B.1.c. should be evaluated for performance.
- c. Third-party certifications:

		
Green Seal	UL ECOLOGO	EPA SAFER CHOICE

**2. Disinfectants and Food-Contact Surface Sanitizers**

- a. SHC, SCH, and SHC Tri-Valley prioritize the use of disinfectant products that meet all of the following:
  - i. EPA registered as disinfectants or hard surface sanitizers,
  - ii. Contain only the following active ingredients: Hydrogen peroxide, ethanol, citric acid, lactic acid, or caprylic acid,
  - iii. Do not contain quaternary ammonium compounds or alkylphenol ethoxylates, and
  - iv. Concentrated products must be adapted for use in a closed-loop dilution system to prevent employee exposure to hazardous concentrates.

**3. Disposable Janitorial Paper Products**

- a. This product category includes:
  - i. Paper towels,
  - ii. Napkins,

- iii. General-purpose wipes without cleaning chemicals, disinfectants, or sanitizers,
  - iv. Bathroom tissue,
  - v. Facial tissue,
  - vi. Toilet seat covers,
  - vii. Placemats or tray liners, and
  - viii. Table coverings.
- b. SHC, SCH, and SHC Tri-Valley prioritize products that meet the following criteria:
- i. Third-party certification by Green Seal or UL ECOLOGO,
  - ii. Processed chlorine-free, and
  - iii. Contain the recycled content level specified in [U.S. EPA Comprehensive Procurement Guidelines for Paper and Paper Products \(CPG\)](#), if applicable.
- 4. Manual Cleaning Supplies and Equipment** - SHC, SCH, and SHC Tri-Valley prioritize products that meet the following criteria:
- a. Mops
    - i. Wet mops and dust mops with reusable mop pads or heads.
    - ii. Mop pads and heads made of microfiber or certified by Green Seal.
    - iii. No products contain polyvinyl chloride (PVC).
  - b. Hand Sponges and Scrubbers
    - i. Made of 100% cellulose or another plant-based fiber, or
    - ii. Contain a minimum of 20% post-consumer recycled material.
  - c. Reusable Cloth Wiping Rags
    - i. Made of microfiber, reused material, or recycled-content fabric with a minimum of 10% post-consumer recycled content, and
    - ii. Not “pretreated” with mineral oil or other chemicals.
  - d. Gloves
    - i. Disposable and reusable gloves free of PVC and latex.

**C. Medical Device Disinfectants and Sterilants**

- 1. SHC, SCH, and SHC Tri-Valley prioritize products that do not contain glutaraldehyde or ethylene oxide (EtO).

**D. Patient Equipment**

- 1. SHC, SCH, and SHC Tri-Valley prioritize products that eliminate the use of formaldehyde, flame retardants, per- and poly-fluorinated alkyl substances (PFAS), polyvinyl chloride (PVC), and antimicrobials, in alignment with Practice Greenhealth’s Healthy Interiors Standard.
- 2. Patient Equipment includes, but is not limited to:
  - a. Patient beds,
  - b. Mattresses and pads (table, stretcher, and pediatric pads),
  - c. IV poles,

- d. Commodes,
  - e. Wheelchairs,
  - f. Shower chairs, and
  - g. Privacy curtains (shower curtains and patient room curtains).
3. Patient equipment that meets the below criteria will be prioritized when in alignment with quality, safety, and patient outcomes.
- a. Formaldehyde
    - i. Formaldehyde is classified as a known human carcinogen by the National Toxicology Program of the U.S. Department of Health and Human Services.<sup>1</sup>
    - ii. Product must not contain added formaldehyde or formaldehyde-based formulations.
  - b. Flame Retardants
    - i. Flame retardants are linked to reproductive, neurocognitive, and immune system disorders.
    - ii. Product must contain less than 1000 ppm of flame retardants by weight of the homogeneous material, where fire code permits.
    - iii. Product must not contain halogenated flame retardants at any level.
  - c. Per- and Poly-Fluorinated Alkyl Substances (PFAS)
    - i. Per- and poly-fluorinated alkyl substances (PFAS) bioaccumulate in wildlife and humans and are highly persistent in the environment. PFAS are associated with pregnancy-induced hypertension, thyroid abnormalities, and increased risk of various kinds of cancer.
    - ii. Product must not contain PFAS as part of a stain-, grease-, or water-repellent treatment or coating.
    - iii. Product must not contain any intentionally added fluorine compounds.
  - d. Polyvinyl Chloride (PVC)
    - i. Polyvinyl chloride (PVC), or vinyl, production requires the use of ethylene dichloride (EDC), a probable human carcinogen, and vinyl chlorine monomer (VCM), a known human carcinogen. The manufacture and incineration of PVC also generate dioxin, a known human carcinogen and persistent, bioaccumulative compound. PVC also can contain harmful additives.
    - ii. Product must contain less than 1% PVC by weight.
  - e. Antimicrobials
    - i. Some antimicrobials are associated with developmental and reproductive harm, allergen sensitivity, and endocrine disruption, and some may contribute to antimicrobial resistance.

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<sup>1</sup> NTP (National Toxicology Program). 2021. Report on Carcinogens, Fifteenth Edition. Research Triangle Park, NC: U.S. Department of Health and Human Services, Public Health Service. <https://ntp.niehs.nih.gov/go/roc15> (EndNote XML)  
DOI: <https://doi.org/10.22427/NTP-OTHER-1003>.

- ii. Product must not contain antimicrobials, except those added to raw materials for the sole purpose of preserving materials in the final product.
- iii. Product must not contain triclosan or triclocarban for any purpose.

#### E. Non-Medical Waste Management

1. In compliance with California requirements, regional zero waste mandates, and the City of Palo Alto's [Municipal Code](#), all non-clinical areas must follow the color-coded, three-bin system for sorting compost, recycling, and landfill waste.



2. Liners for waste bins must comply with the following requirements.
  - a. Landfill: Liners for landfill bins must be clear and transparent with no tint or symbols.



- b. Recycling: Liners for recycling bins must have a blue tint and a clearly marked recycling symbol.



- c. Compost: Liners for compost bins must have a green tint and be certified compostable by the Biodegradable Product Institute (BPI) or the Compost Manufacturing Alliance (CMA).
3. Liners for soiled linen bins must be reusable.
4. Reusable liners for other specialty collection should be considered.

## APPENDIX B: Chemicals of Concern

Product must meet all the requirements in this appendix. Exceptions are permitted if departments are required to adhere to specific accreditations and/or regulations (e.g., Board of Pharmacy, NFPA).

For additional technical compliance detail, refer to Practice Greenhealth's [standardized environmental criteria technical details](#).

1. **EUROPEAN UNION RESTRICTION of HAZARDOUS SUBSTANCES (EU RoHS) DIRECTIVE (ELECTRONICS):** All homogeneous electronic parts are compliant with all EU RoHS Directive's restricted limits (excluding exemptions).

Chemicals include cadmium, mercury, lead, hexavalent chromium, polybrominated biphenyls, and polybrominated diphenyl ethers. RoHS Directive information, including exemptions and restricted limits, can be found at <https://www.gov.uk/guidance/rohs-compliance-and-guidance>.

2. **BISPHENOL A (BPA):** All homogeneous materials contain less than 1,000 ppm of BPA and related structural/functional analogues.

Structural/functional analogues include: bisphenol AP, bisphenol AF, bisphenol B (BPB), bisphenol C, bisphenol C2, bisphenol E (BPE), bisphenol F (BPF), bisphenol G, bisphenol M, bisphenol S (BPS), bisphenol P, bisphenol PH, bisphenol TMC, bisphenol Z, and 4-cumylphenol (HPP) or Bisphenol A derived chemicals.

If the compound is detected in environmental media or human biomonitoring studies and is used as a functional substitute for BPA but has sufficient publicly-available hazard data to demonstrate that it does not have endocrine disrupting potential (estrogen and/or androgen receptor agonism and/or antagonism), it is not restricted.

3. **POLYVINYL CHLORIDE (PVC):** Product does not contain PVC or other chlorinated polymers. Products made up of less than 1% (one percent) of PVC by weight are exempt.
4. **FLAME RETARDANTS (ELECTRONICS):** Electronic product is free of halogenated organic flame retardants by weight of homogeneous material (less than 1,000 ppm).
5. **FLAME RETARDANTS (NON-ELECTRONICS):** Non-electronic product is free of all flame retardants by weight of homogeneous material (less than 1,000 ppm).

Where flammability standards require the use of flame retardants, inorganic flame retardants approved under the Blue Angel Low-Emission Textile Floor Coverings, DE-UZ 128, criteria are allowed. In particular, the following compounds may be used: inorganic ammonium phosphates (for example, diammonium phosphate or ammonium polyphosphate), other dehydrating minerals (for example, aluminium hydroxide), or expandable graphite. Antimony oxides are prohibited.

6. **ORTHO-PHTHALATES, INCLUDING di(2-ethylhexyl) phthalate (DEHP):** All homogeneous materials contain less than 1,000 ppm of ortho-phthalates, including Di-2-ethyl hexyl phthalate (DEHP) CAS 117-81-7, Benzylbutylphthalate (BBP) CAS 85-68-7, Di-n-hexyl phthalate (DnHP) CAS 84-75-3, Di-isodecyl phthalate (DIDP) CAS 68515-49-1 or 26761-40-0, Dibutyl phthalate (DBP) CAS 84-74-2, Diisononyl phthalate (DINP) CAS 28553-12-0 and 68515-48-0, Diisobutyl phthalate (DIBP) CAS 84-69-5, Di-n-pentyl phthalate (DPENP) CAS 131-18-0, Dicyclohexyl (DCHP) CAS 84-61-7, and Di-n-hexyl phthalate (DHEXP) CAS 84-75-3.
7. **PROP 65 CHEMICALS:** Product does not contain intentionally added chemicals listed under the California Safe Drinking Water and Toxic Enforcement Act of 1986, Proposition 65, at levels that require warning or are prohibited from release to the environment in the State of California. The Prop 65 list can be found at <http://oehha.ca.gov/proposition-65/proposition-65-list>.
8. **ANTIMICROBIAL / ANTIBACTERIAL AGENTS:** Product does not contain intentionally added antimicrobial/antibacterial agents to reduce surface pathogens.
9. **PERSISTENT BIOACCUMULATIVE TOXIC CHEMICALS (PBTs):** All homogeneous materials contain less than 1,000 ppm of PBTs.  
PBTs include chemicals on any of the following lists:  
[US EPA: Priority Chemicals \(NWMP\)](#)  
[OSPAR: Chemicals for Priority Action](#)  
[UNEP Stockholm Convention: Persistent Organic Pollutants \(POPs\)](#)  
[US EPA: Toxics Release Inventory PBTs](#)
10. **METALS:** Product does not contain mercury, lead, cadmium, or organotin compounds by weight of homogeneous materials.

Lead and lead-containing compounds do not exceed 40 ppm, mercury and mercury-containing compounds do not exceed 100 ppm, cadmium and cadmium-containing compounds do not exceed 100 ppm, and organotin compounds (such as tributyltin and dibutyltin) do not exceed 100 ppm. In the case of the electronic components of products, the limits described here are superseded by the RoHS requirements.

11. **PER- AND POLY-FLUORINATED ALKYL SUBSTANCES (PFAS):** Product does not contain stain- or water-repellent treatments or other surface protections that contain a PFAS. Intentionally added fluorine compounds are prohibited, and total fluorine must be less than 100 ppm.

PFAS include long and short chain per- and poly-fluorinated alkyl substances and fluorinated polymers. This includes any substance that meets any one of the following definitions:

- a. Perfluoroalkyl substances: Substances for which all hydrogen atoms on all carbon atoms (except for carbons associated with functional groups) have been replaced by fluorine atoms.
- b. Polyfluoroalkyl substances: Substances for which all hydrogen atoms on at least one (but not all) carbon atoms have been replaced by fluorine atoms.
- c. Fluoropolymers: Carbon-only polymer backbone with fluorine atoms directly bound.
- d. Perfluoropolyethers: Carbon and oxygen polymer backbone with fluorine atoms directly bound to carbon atoms.
- e. Side-chain fluorinated polymers: Variable composition non-fluorinated polymer backbone with fluorinated side chains.

## APPENDIX C: Waste Reduction

Product must meet a minimum of two (2) of the requirements in this appendix. For additional technical compliance detail, refer to Practice Greenhealth's [standardized environmental criteria technical details](#).

1. **DOES NOT CREATE A HAZARDOUS WASTE (PRODUCT):** Product does not become or generate hazardous waste according to state or federal hazardous waste rules (e.g., EPA's Resource Conservation and Recovery Act).
2. **10% OR MORE POST-CONSUMER RECYCLED CONTENT (PRODUCT):** Product contains more than 10% post-consumer recycled content.
3. **RECYCLABLE (PRODUCT):** Product is recyclable.

A product is recyclable if it can be collected, separated, or otherwise recovered from the waste stream through an established recycling program for reuse or use in manufacturing or assembling another item, with recycling facilities for the item available to at least 60% of communities where the item is sold. Recyclable does not describe FDA-regulated single-use device reprocessing. Products that become regulated medical waste after use cannot claim to be recyclable.

4. **RECYCLED CONTENT (PRIMARY PACKAGING):** Primary packaging contains more than 10% post-consumer recycled content.

Primary packaging surrounds the product. For example, the wrapper surrounding a single roll of toilet paper is considered primary packaging.

Post-consumer recycled content material is a material or finished product that has served its intended use and has been diverted or recovered from waste destined for disposal, having completed its life as a consumer item. Post-consumer recycled content is the material collected from recycling programs and is calculated as a percentage of the total weight of the product.

5. **RECYCLED CONTENT (SECONDARY PACKAGING):** Secondary packaging contains more than 30% post-consumer recycled content.

Secondary packaging surrounds a group of products, such as the box or plastic wrap containing multiple rolls of individually wrapped toilet paper.

6. **FOREST STEWARDSHIP COUNCIL:** Packaging has received Forest Stewardship Council (FSC) certification.

Packaging has one of the following FSC certifications:

- a. 100% from well-managed forests;
- b. Mix from responsible sources; or
- c. Recycled: made from recycled content material.

7. **RECYCLING INFORMATION:** Packaging is labeled with recycling information, meeting U.S. Federal Trade Commission Green Guides for labels. Product must conform with the requirements of California Senate Bill 343 (“Truth in Labeling”).

8. **RECYCLABLE (PACKAGING):** Primary packaging is recyclable.

A package is recyclable if it can be collected, separated, or otherwise recovered from the waste stream through an established recycling program for reuse or use in manufacturing or assembling another item, with recycling facilities for the item available to at least 60% of communities where the item is sold.

9. **PVC, POLYSTYRENE (PACKAGING):** Product is packaged without both PVC and polystyrene.