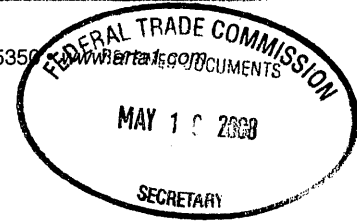
  
American Reusable Textile Association • P.O. Box 1142, Mission, KS 66222 • 863/660-5350



May 7, 2008

Mr. Donald S. Clark  
Secretary  
Federal Trade Commission  
600 Pennsylvania Avenue  
Washington, DC 20580

**Re: Green Guides Regulatory Review, 16 CFR Part 260, comment, Project P954501**

Dear Mr. Clark:

The American Reusable Textile Association (ARTA) thanks you for the opportunity to offer our views concerning the Federal Trade Commission (FTC) review of the **Guides for the Use of Environmental Marketing Claims (“Green Guides” or “Guides”)**. ARTA and its member companies and organizations have been in the forefront of supplying environmentally sound products to the healthcare, hospitality, industrial and commercial sectors for more than a quarter century.

### **The American Reusable Textile Association**

ARTA’s membership includes manufacturers of materials which are reusable and producers of supplies, equipment and services to support those products. Relative to single use, disposable materials, reusable textile products are not constantly discarded in landfills, nor are they burned in medical waste incinerators (MWI) or in municipal; incinerators. Based on extensive research and development, by ARTA members, over the last four decades, reusable textile products have been engineered to last at least 50 process,(washing and where needed sterilization), and use cycles.

### **Reusable Textiles – Performance, Cost Environment**

In an attempt to offer the FTC a broader, overall picture of ARTA’s activities, enclosed please find three (3) copies of our most recent publication, **“Reusable Textiles –**

way you see fit, we anticipate that you may choose to retain one copy for your permanent file and circulate the other copies to key parties within the Commission.

### **Single Use Disposables – Environmental and Health Concerns**

As outlined in the enclosed publication, it is shown that reusable textiles offer three main values to twenty first century society. Primarily, and pertinent to the main issue under consideration, reusable healthcare and institutional textiles offer significant environmental advantages.

This point can best be understood by a comparison to disposable products which, as mentioned previously, require frequent, if not daily, removal to either hazardous waste landfill sites, or to processing through medical waste incinerators (MWI) The latter are subject to regulations promulgated by the U.S. EPA (Federal Register, Final Rule , September 15, 1997) and which have been used in diminishing frequency, due to costly and demanding regulations. This has put a burden on landfill acreage, which continues to be expensive and difficult to establish.

Much of the reasoning, for the EPA establishing MWI regulations, is based on health and environmental hazards caused by the use of MWI. Findings of the EPA for MWI, (Federal Register, February 27, 1995 ), includes an overall negative impact on air quality. Specifically, MWI emissions produce dioxins and furans, along with carbon monoxide and heavy metals. The EPA has found that MWI represent the largest known source of dioxin emissions in the U.S.. The EPA reports further that dioxins can result in cancerous and non-cancerous human health effects.

The use of landfills, utilized to a greater extent, as MWI decline in use, demonstrate other problems, not the least of which are health issues to families living in close proximity to these sites. Studies in **Environmental Research** (Goldberg, Mark S., 69[1]), **Archives of Environmental Health** (Goldberg, Mark S., 54[4]), and **Environmental Health Perspectives** (Vrijheid, Martine, March 2000), all concur that statistically significant negative health impacts have been found for residents living adjacent to, or near, these sites.

### **A Threat to Children in Our Society**

The preceding factors are made even more critical when issues in **Environmental Health Perspectives** are reviewed. One such report, “Assessing the Effects of Endocrine Disrupters in the National Children’s Study”, (October 2003) divulges that children exposed to agents which may alter endocrine functions, “could suffer adverse effects on health and development in childhood and throughout the lifespan.” The summary, based on efforts at the Mount Sinai School of Medicine, expressed concern that many potentially harmful chemical agents are dispersed in the air and water from many sources, including waste landfill sites.

## **A Threat to the Health and Wellbeing of Older Americans**

An additional report in **Environmental Health Perspectives**, “Toward a New Understanding of Aging”, (November, 2003), discloses that the growing numbers of an aging population are also at risk from environmental factors. The report states that exposure to toxicants can increase the risk of disease common to the elderly such as osteoporosis, hypertension, renal impairment, Parkinson Disease and Alzheimer disease.

## **Hospitals for a Healthy Environment (H2E)**

The American Hospital Association has joined into an agreement with the U.S. Environmental Protection Agency for the purpose of reducing medical waste. The agreement seeks to guide the healthcare industry with actions for “minimizing the production of persistent bioaccumulative and toxic (“PBT”) pollutants and reducing the volumes of waste generated”

Specifically, the agreement has a goal of achieving a fifty percent (50%) reduction in total waste reduction by the year 2010.

## **A New Concept of Sustainability**

Sustainable development has been defined as , “development that meets the needs of the present without compromising the ability of future generations to meet their own needs”, (The United Nations World Commission on Environment and Development – The Bruntland Commission)..

A recent report, (Meadows, Dru, “ASTM Standard Breaks Barriers to Global Sustainable Development”, **ASTM Standardization News**, November, 2007), identifies three general principles associated with sustainability. These are environmental, social, and economic. Known also as the three pillars of sustainability, these factors offer a way to achieve “applied sustainability”, relative to “ideal sustainability”.

As outlined in the **Standardization News** report, ideal sustainability has often been the goal of those seeking a pristine society. These goals are laudable, but unattainable. Society needs a clean environment and also products and jobs. The business/industrial sector could be completely eliminated but applied sustainability takes into consideration the three factors designated, recognizing that these elements must be balanced..

Reusable textile products, for example, as they offer feasible alternatives to single use disposable products, present a case for applied sustainability. The use of reusables promote the environment, offer the social need of offering high quality products for the public and the economic need of supplying jobs for employees of firms involved in this sector of enterprise. The reality is that our disposable, throw away, culture has resulted in some sectors of the institutional market dominated by disposable materials. Surgical packs, for example, are estimated to represent some 80% market share for disposable products. If reusable surgical packs were to grow from some 20% of the market today, to even 40, or 50% of this market, a significant environmental advantage would be realized. At the same time, the other factors of social needs, ( products) and economic needs (jobs) would also be enhanced.

### **FTC Issues for Comment**

As the FTC Proposed Rules outline (Federal Register, November 27, 2007), a number of points were proposed for comment,(III. Issues for Comment). ARTA will respond to a number of these, based on the background disclosed with the preceding.

### **Is there a continuing need for for the Guides? Why or why not?**

ARTA believes that the Guides represent a continuing need. As outlined, previously in this response, ARTA has been assertive in offering environmentally sound products to institutions, of all kinds, since our founding more than 25 years ago. As outlined in ARTA's brochure, (copies enclosed), the products which are offered by our member organizations, deliver environmental, cost and performance advantages.

As documented in the preceding, our Society is challenged by environmental, as well as, human health issues through the practice of both medical waste incineration and the utilization of landfills. Reusable products, when selected, relative to single use disposables, offer the advantages of minimizing the need for utilizing either MWI or landfills. To this extent, claims made by the reusable industry, that these products diminish the problems created with the proliferation of medical waste and therefore enhance the environment, are realistic.

Accordingly, it is proposed that there is a continuing need for the Guides. This offers sectors such as reusable textile producers a basis for disclosing the many environmental advantages to the public. Without the Guides, various producers of materials, which are not environmentally sound, could more readily make misleading claims

### **International Laws, Regulations, or Standards**

The FTC is most likely, well aware of the **United Nations World Commission on Environment and Development, The Bruntland Commission**, referred to previously.

The work of this body should be among those considered in future deliberations. As the global economy continues to remain a reality of business activity in the 21<sup>st</sup> century, the efforts of the UN, in this matter, should be a key factor in the ongoing development of standards and regulations.

An additional organization involved in these efforts is **ASTM International**, a standards setting organization currently establishing sustainability Standards.. This organization pursues the matter through Subcommittee E06.71. A listing of the work items under E06.71 can be found at <http://www.astm.org/COMMIT/E06.htm>. .

### **Sustainable Claims and Sustainable Development**

The term sustainable development, as previously disclosed, should as it's basis, rely on the definition of the Bruntland Commission. Restated, this definition emphasizes that "sustainable development is development which meets the needs of the present, without compromising the needs of future generations."

In addition, the more recent designations of "applied sustainability" and "ideal sustainability" should also be taken into consideration. As stated previously, in this correspondence, practical sustainability, as opposed to ideal sustainability, should be recognized as a realistic course of action, for the overall well being of our Nation and mankind in general.

### **Guidance for Recycled Content Claims for Textile Products**

The Guides should recognize the reality of textile products which are reusable relative to those which are disposed of following a single use.

Technology has been commercially and successfully introduced during the last half century which utilizes textile products capable of meeting specific performance standards through multiple processing and use cycles. In most cases a minimum of 50 processing/use cycles has been achieved. Under many circumstances, products are found to perform in a satisfactory manner, beyond 50 cycles. In specific institutional applications, such as for surgical drapes, gowns and wrappers, the processing not only includes commercial/institutional laundering, but sterilization procedures, as well.

Furthermore, in many cases, even following 50 cycles, or more, when a product such as a surgeon's gown, may no longer meet the specific requirements for use in surgical applications, the product is often downgraded and rather than being discarded, can be recycled as non-critical cover ups for painters, cleaners and for other ancillary heavy soil jobs.

It should also be noted that the technology exists with reusable textiles to support many forms of recycling methods. For example, polyester fiber, normally produced from

polymers, can also be manufactured from recycled polyester beverage containers. This technology is being commercially practiced. In addition, many depleted products, such as wrappers and drapes can be recycled as cleaning and wiping materials, or shredded to be respun and regenerated into other useful products.

As a counterpoint, single use disposable products should be recognized as creating ecological challenges to our environment, requiring, as they do, constant disposal in landfills or MWI, with the issues incumbent on these products, as previously disclosed, in this communication.

Recognition should be made for the positive alternatives which reusable textiles present relative to disposables, and the environmental benefits that reusables demonstrate by avoiding the constant use of disposal techniques.

### **Future Assistance**

The American Reusable Textile Association will be pleased to offer the FTC additional assistance in supporting the goals of Green Guidelines. The preceding disclosure represents an overview of our experience and we will be happy to respond further to additional questions in this matter, which may be required, as the current deliberations move forward.

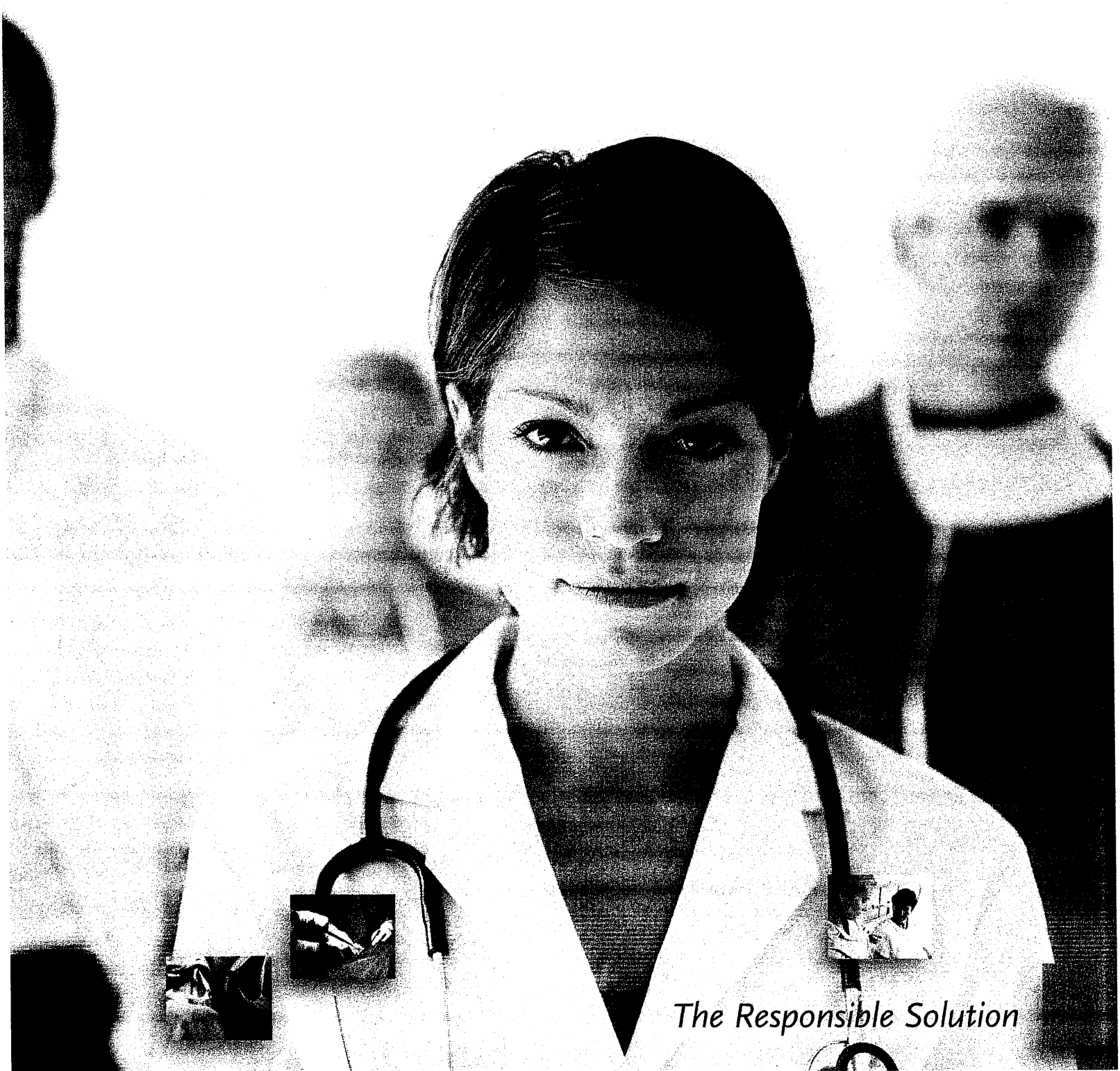
The undersigned will remain ARTA's primary contact for any inquiries related to this program and depending on any specific needs, which may become evident, others within our organization will be available to respond in support of this current effort.

Howard M. Zins  
Legislative Director  
ARTA  
810 Rotherham Drive  
Ballwin, MO 63011

636-227-3582  
[hmzins@yahoo.com](mailto:hmzins@yahoo.com)

# Reusable Textiles

*Performance, Cost, Environment*



*The Responsible Solution*

## Reusable Textiles: The Responsible Solution



It is unavoidably clear that the healthcare sector continues to face many challenges in service delivery and that people are looking to be informed and involved in finding viable solutions.



## Good for the Future

While those of us across North America are fortunate enough to be surrounded by the most advanced healthcare services in the world, we must also consider the critical effects of rising healthcare costs, and how our lives impact the environment.

It is of utmost importance to seek solutions in healthcare that are mindful of our environment and regard sustainability as a key element. Sustainability has been defined as actions that meet the needs of the present without jeopardizing the needs of future generations.<sup>1</sup>

This document was prepared with the intent of communicating three key factors: the performance, cost and environmental benefits of reusable textiles and how healthcare

organizations throughout the world are utilizing current research data; feedback from end users; and standards of practice to find ways to approach these concerns responsibly and effectively. This and many other research studies will be the focus for creating a greater appreciation and acceptance for reusable textiles, promoting an open forum for exchanging ideas and information and providing educational opportunities to both consumers and producers of reusable textiles.

Most recently, the threats of infectious diseases, bio-terrorism, an aging population, increased healthcare expenses and new and more complex regulations are bringing more interest to the forefront for discussion and consideration.

"The fiscal status of our national health care delivery systems demand that we can no longer afford the luxury of using single use product. We must recognize the benefits reusable products have relative to cost and the environment," says, Nathan L. Belkin, Ph.D., Founding Member of the American Reusable Textile Association (ARTA).<sup>2</sup>

When all factors are taken into account, reusable textiles clearly emerge as the most effective, comfortable, cost effective, environmentally friendly option for healthcare facilities. Without question... the most responsible solution.

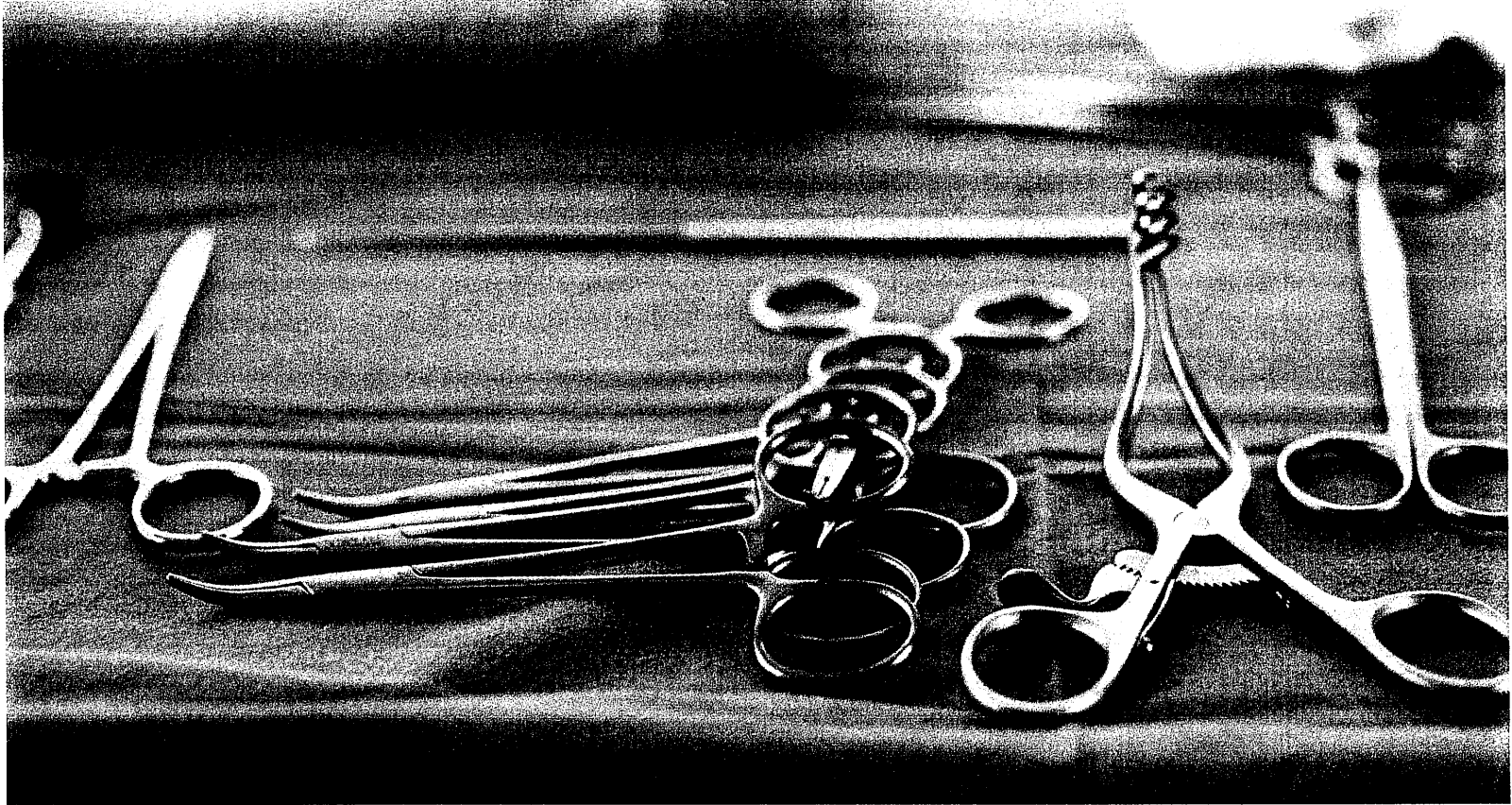
*"To combat the ever-growing issue of medical waste and pollution, Advocate Christ Medical Center implemented a reusable surgical pack program. As a result of switching to a reusable program, the medical center has reduced its total surgical waste by nearly 550,000 pounds in the past three years."*

Patricia Farrell  
Director of Surgical Services  
Advocate Christ Medical Center  
Oaklawn, Illinois

*"We are committed to utilizing to its fullest potential the Reusable Sterile Pack Program. Our commitment to this program is vital to the hospital's mission to improving the health of the community by contributing to significant waste reduction and pollution control."*

Kathi Blackburn, CS Manager  
Swedish Covenant Hospital  
Chicago, Illinois

## Performance



Low rates of particle release, barrier action and thermal regulating, as well as fluid retaining and repelling properties are just a few of the feature properties of reusable surgical textiles that have led to a significant reduction in infection rates in operating theatres and a widespread acceptance worldwide.

## Worldwide Acceptance

In the healthcare market, reusable textiles provide safety with greater comfort and a more professional image. A major advantage of reusable gowns is their ready acceptance by the surgical teams who use them. They are more comfortable to wear by virtue of their breathability and design, as well as the flexibility of the fabrics to provide maximum freedom of movement.<sup>3</sup> The mix of high tech fabrics makes surgical textiles much stronger and more durable than disposable textiles. The clinical performance of reusables is consistently better than that of the disposable counterpart. Low rates of particle release, barrier action and thermal regulating, as well as fluid retaining and repelling properties are just a few of the feature properties that have led to a significant reduction in infection rates in operating theatres worldwide.<sup>4</sup>

Karen K. Leonas, PhD from the University of Georgia reports that the transfer of pathogens through body fluids has prompted published guidelines from the Occupational Safety and Health Administration, Centers for Disease Control and Prevention, The Canadian Standards Association and the Association of Operating Room Nurses. These guidelines help healthcare workers reduce their risk of occupational

exposure. A key factor in these recommendations is the use of protective surgical apparel as a barrier to microbial transfer. Many studies have been conducted in both laboratories and operating theatres to evaluate the effectiveness of various surgical gowns as barriers. Today, researchers are looking more specifically at identifying the fabric parameters that control transmission.

In addition, the Association for the Advancement of Medical Instrumentation provides guidelines for the proper handling, processing, and preparation of reusable surgical textiles either on-site or off-site for use in healthcare facilities, specifically addressing design criteria for all aspects of reusable products.<sup>5</sup>

The Department of Veterans Affairs Hospitals support and endorse the use of the reusable textiles program. Chief Facilities Management Officer, C. V. Yarbrough, issued a letter to all departments outlining the cost and patient benefits of reusable textiles. The letter encourages, when appropriate, the use of reusable textiles instead of disposable-like items.<sup>6</sup>

Even with repeated washings, reusable surgical textiles provide a consistent level of barrier protection. A study by J. Bellchamber and coworkers reported in *Infection Control and Hospital Epidemiology* in April 2001 compared reusable gowns and drapes to single-use items in patients undergoing coronary artery bypass surgery. No difference in the rates of sternal or leg-wound infections was noted between the groups.<sup>7</sup>

The advent of stringent new standards for the evaluation of barrier performance on surgical textiles has just recently allowed objective comparisons to be made of the different hospital textiles, proving that today's sophisticated, high-tech reusable fabrics are better than their single-use counterparts.

The prevention of wound infections is a major priority in healthcare. Understanding the impact of reusable vs. disposables for factors such as heat, pressure, friction and moisture are critical.<sup>8</sup>

The use of high quality reusable underpads to make an incontinent bed is supported by research that shows a reduction in pressure sores, better fluid containment and greater comfort for patients.<sup>9</sup>

*"With the use of a good quality system containing all the necessary elements, the high tech reusable medical textile products available on the market today are capable of providing equal or better performance as compared to the best disposable alternatives with significant overall cost savings and environmental benefits."*

Peter L. Brown, Associate  
W.L. Gore & Associates, Inc.  
Elkton, Maryland

## Cost



“Moving to the sterile repack system in 1996 provided a fifteen percent cost reduction and a restructuring of process capability that has saved hundreds of thousands of healthcare dollars.”

Pat Pocock, RN, MS,  
Director of Surgical Services  
St. Joseph's Health Care  
London, Ontario

# Cost

As healthcare institutions across the country look for new ways to control costs without compromising quality of care, one way hospitals are saving money is through the use of reusables.<sup>12</sup> Recent evidence – some of which is illustrated in this publication – from healthcare institutions throughout the United States and Canada shows considerable cost-savings from the use of reusable textiles.

The reusable system ensures inventory control, reduced capital costs, reduced storage costs and overall quality improvements. Materials are ordered on an as-needed basis allowing for more flexibility and crisis management. The use of custom-designed surgical packs ensures reductions in unused parts and supports the advantages of close partnership relationships with customers.

## Major Milestones

- Mercy Healthcare of Sacramento now purchases reusable liquid-proof surgical gowns and towels at six facilities and saves \$60,000 per year, as well as preventing 50,000 pounds of waste<sup>13</sup>
- The University of Iowa Hospital and Clinics developed a Value Analysis Program Team in March of 1999 to evaluate linen usage in order to reduce costs:
  - ~ 5-year cost savings from reusable pillows: \$300,000
  - ~ 5-year cost savings from reusable underpads: \$200,000<sup>14</sup>

*"We started our Sterile Recovery Division in 1996 with High Performance Products. They are controlled and tracked with RF chip technology. We have documented over the last 8 years that the products have an average life of 4 years. This exceptional life cycle allows HLS to reduce costs to the customer, while providing a high level of protection and allowing the customer to reduce hazardous medical waste."*

*Donald A. Pedder, President and CEO  
Hospital Linen Services  
Chicago, Illinois*

*Costs of a Surgical Gown Comparisons re: Reusable vs. Disposable impermeable surgical gowns (50 processings vs. single use)<sup>10</sup>*

	REUSABLE	DISPOSABLE
Initial Cost	\$60.00	\$4.50
Cost per Use	1.20 *	4.50
Administrative Costs	0.15	0.15
Laundering	0.50	—
Pack Making and Sterilization	0.40	—
Waste Disposal	—	0.25
Total Cost per Use	\$2.25	\$4.90

\*50 processings

## SAMPLE WORKCHART<sup>11</sup>

*Choosing Between Alternatives: Reusable vs. Disposable*

	REUSABLE	DISPOSABLE
Initial Purchase Price (for one)	\$ _____	\$ _____
Waste Disposal Cost (for one)	\$ _____	\$ _____
Estimated Number of Uses	_____	_____
<b>Total Fixed Cost: (Initial Purchase Price + Disposal Cost) ÷ Number of Uses</b>	\$ _____	\$ _____ a)
Administrative Costs	\$ _____	\$ _____
Storage Costs	\$ _____	\$ _____
Cost of Laundering (including extra handling costs to get it to the facility)	\$ _____	\$ _____
Transportation/Handling Cost at facility	\$ _____	\$ _____
<b>Total Per Use Cost: Sum of Admin, Storage Cost, Cleaning Cost and Transportation/Handling Cost</b>	\$ _____	\$ _____ b)
<b>Total: Sum of Total Fixed Cost and Total Use Cost (a + b)</b>	\$ _____	\$ _____

## Environment



“Utilizing a reusable sterile pack program has significantly reduced the amount of waste going into the Medical Waste Stream from our Operating Room and Ancillary Departments.”

Debra Runyan, RN, MS,  
Director of Surgical Services  
Froedtert Memorial Lutheran Hospital  
Milwaukee, Wisconsin

# The Rising Tide

The U.S. Environmental Protection Agency (EPA) identifies medical waste incineration as the third largest known source to the environment of highly toxic dioxin, mercury, furans, acid gases, heavy metals and particulates. The laundry industry has made significant strides, through an industry effort called Laundry ESP, to reduce the amount of energy, water, waste and harmful chemicals used in our industry. One such effort is the use of lower temperatures, less aggressive washing and the continued inroads made by environmentally-friendly enzyme detergent systems.

Fluid repellent technology has extended the useful life of barrier garments up to 100 percent thus reducing the volume of medical waste by prolonging the life of barrier fabrics. Additionally, laboratory and field tests conducted on operating tunnel and conventional washers have shown that the washing process can reduce the bacterial counts on healthcare textiles and that the heat of ironing and/or drying textiles also kills bacteria.

The growing public concern about nosocomial infection and cross contamination within healthcare facilities means that infection control procedures must also carry over to good laundering practices. Although the risk of disease transmission from soiled linens is negligible, a clear understanding and prevention techniques are necessary to avoid inadvertently spreading disease.<sup>16</sup>

The European Textile Services Association (ETSA) sought the advice of an independent Life Cycle Assessment practitioner, dk-Teknik Energy & Environment in Denmark, to examine the environmental impact during the life cycle of surgical gowns in several environmental impact categories. The objective was to establish which types of gowns offer the most environmentally friendly solution. The results showed that in most cases reusable gowns have lower environmental impact than disposable gowns. The clear environmental winner was the 100% polyester microfibre gown, mainly because it is lighter in weight.<sup>3</sup> The international community is working to improve the environment through initiatives such as the Kyoto Protocol.<sup>17</sup>

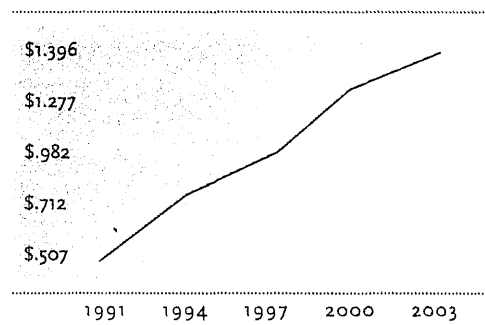
## National Health Expenditures and Projections

It is clear that healthcare faces many challenges and, at the same time must meet increased demand from informed populations seeking affordable, high quality best practice based results. With healthcare comprising such a significant component of government and personal budgets, reusable hospital textiles can reduce costs significantly, making them the most responsible option for today's healthcare provider.

Projected Health Expenditures (in trillions of USD)<sup>15</sup>



Medical Waste Cost (in billions of USD)<sup>16</sup>



# References

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- 9 A perspective on prevention: back to the basics with high tech results, Karen Paradee, RN Clinical Director, The Sewing Source Inc.
- 10 Zins H, "Reusable Textiles: A Single Solution to Healthcare's Multiple Woes," Textile Rental, Feb. 1996.
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- 12 CMA Management, March 2002
- 13 [www.ciwmb.ca.gov/bizwaste/factsheets/Hospital.htm](http://www.ciwmb.ca.gov/bizwaste/factsheets/Hospital.htm)
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- 16 Birkbichler JW, "A Study to Investigate the Impact of Standard Washing Methods on Microbial Count Reduction," Texcare Asia, August 1998, "Microbial Reduction on Linen," Infection Control Today, Aug. 1998, p.12-18.
- 17 <http://www.ec.gc.c/climate/kyoto-e.html>



# Associations

## **American Reusable Textile Association (ARTA)**

The key objectives for ARTA are to promote the value and need for reusable textiles by providing general and technical educational opportunities to consumers and producers. This objective is met through effective communication with appropriate interest groups. ARTA provides a forum for the exchange of information focusing on key economic and environmental issues while encouraging member involvement.

*Contact Number: (803) 985-5222*

## **International Association for Healthcare Textile Management (IAHTM)**

The IAHTM make it their mission to gather as a group on a regular basis to promote the education of Healthcare Textile Managers. It is important to them that they provide an environment where the exchange of ideas and information is welcomed and encouraged for the mutual benefit of their members and the organization.

*Contact Number: (317) 899-4050, Ext. 120*

## **Canadian Reuseable Textile Association (CRTA)**

The CRTA promotes the interests of its members and the general public to create a greater appreciation for and acceptance of reusable textiles. In addition, it provides a forum for the exchange of information for all interested parties on key economic and environmental issues. The CRTA also works with government to communicate concerns and to develop policies with key decision makers.

*Contact Number: (519) 641-4555*

*This publication was developed jointly by representatives from the American Reusable Textile Association (ARTA), the International Association for Healthcare Textile Management (IAHTM) and the Canadian Reuseable Textile Association (CRTA) for the purpose of providing accurate and professional data to assist in the promotion of reusable textiles in our industry*