CATHOLIC HEALTHCARE WEST
ADMINISTRATIVE POLICY AND PROCEDURE

FROM: CHW Mission Integration

SUBJECT: Comprehensive Chemicals Policy

EFFICIENT DATE: January 5, 2009

REVISED:

ORIGINAL EFFECTIVE DATE: January 5, 2009

REPLACES:

APPLIES TO: System Offices: X
Acute Care Entities: X
Non-acute Care Entities: X

I. PURPOSE

The purpose of this policy is to articulate the commitment of Catholic Healthcare West (CHW) to create an environment for patients, employees and visitors that is free from the hazards posed by chemicals that are harmful to humans, animals and the environment.

There are alarming increases in chronic diseases in the United States today. Cancer, asthma, birth defects, developmental disabilities, autism, endometriosis and infertility are becoming increasingly common. Mounting evidence links these diseases to environmental toxicants. Lack of chemical regulation has resulted in widespread exposure of people and ecosystems to high hazard chemicals.

It shall be CHW’s policy to purchase products containing chemicals and/or materials that are the least toxic throughout their lifecycles to the fullest extent practicable and to increase its purchase of high performing products that are designed and made without high hazard chemicals, and thereby improve patient, employee and community health.
A. **Alignment With CHW Core Values**

This policy advances CHW’s core values, as follows:

- **Stewardship** – Accountability for the ecological resources entrusted to our care as we promote healing and wholeness
- **Collaboration** – Working with people who support common values and vision to achieve goals and to improve quality of life
- **Excellence** – Specifying products and processes that are sustainable and healthy for patients, employees and planet, with the goal of providing quality care
- **Justice** – Advocating for social and environmental justice, while addressing issues affecting those who are poor and disenfranchised
- **Dignity** – Respecting the inherent value and worth of each member in the broader community and recognizing all individuals need clean air, pure water and healthy food.

B. **Alignment With External Principles**

In the implementation of this policy, CHW intends to conform to the following principles:

1. **The Precautionary Principle.** When an activity raises threats of harm to the environment or human health, precautionary measures should be taken even if some cause and effect relationships are not fully established scientifically. (Definition created at the Wingspread Conference on the Precautionary Principle, January, 1998.)

2. **Guiding Principles for Chemicals Policy by the Business-NGO Working Group.** To advance an economy where the production and use of chemicals are healthy for humans, as well as for our global environment and its non-human inhabitants, responsible companies and their supply chains should adopt and implement the following four guiding principles for chemicals policy.

   - **Know and disclose product chemistry.** Manufacturers will identify the substances associated with and used in a product across its lifecycle and will increase as appropriate the transparency of the chemical constituents in their products, including the public disclosure of chemicals of high concern. Buyers will request product chemistry data from their suppliers.

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1 “Chemicals of high concern” include substances that have the following properties: 1) persistent, bioaccumulative and toxic (PBT); 2) very persistent and very bioaccumulative (vPvB); 3) very persistent and toxic (vPT); 4) very bioaccumulative and toxic (vBT); 5) carcinogenic; 6) mutagenic; 7) reproductive or developmental toxicant; 8) endocrine disruptor; or 9) neurotoxicant. “Toxic” (T) includes both human toxicity and ecotoxicity.
• **Assess and avoid hazards.** Manufacturers will determine the hazard characteristics of chemical constituents and formulations in their products, use chemicals with inherently low hazard potential, prioritize chemicals of high concern for elimination, minimize exposure when hazards cannot be prevented, and redesign products and processes to avoid the use and/or generation of hazardous chemicals. Buyers will work with their suppliers to achieve this principle.

• **Commit to continuous improvement.** Manufacturers shall establish corporate governance structures, policies and practices that create a framework for the regular review of product and process chemistry. Buyers shall promote the use of chemicals, processes, and products with inherently lower hazard potential.

• **Support public policies and industry standards.** Manufacturers and buyers shall support public policies and industry standards that advance the implementation of the above three principles, assure that comprehensive hazard data are available for chemicals on the market, take action to eliminate or reduce known hazards and promote a greener economy, including support for green chemistry research and education.

II. **POLICY**

CHW seeks to provide health care services in a manner that protects and enhances the health of people, communities and the earth, now and for future generations. To that end, CHW develops strategies for promoting, developing and using chemicals that are environmentally preferable across their entire lifecycles. CHW supports, and engages in, initiatives to disclose product chemistry; assess and avoid hazards; promote the use of chemicals, processes, and products with inherently lower hazard potential; and advocate for public policies and industry standards that advance a greener economy.

III. **PROCEDURES**

A. **Worker Health And Safety**

CHW operations councils and hospital safety committees will:

1. Identify where chemicals of concern are used
2. Evaluate hazards in the hospital that can lead to occupational and environmental problems
3. Develop a plan to communicate those hazards to appropriate staff
4. Research and evaluate the feasibility of using alternatives to the hazards
5. Establish priorities for reducing/eliminating the use of chemicals of concern as alternatives are identified

6. Develop an elimination or substitution strategy where safer alternatives are available

7. Control hazards where safer substitutes are not available by applying the hierarchy of controls with engineering, work practice and Personal Protective Equipment (PPE) to protect workers

8. Approach Infection Control, Environmental Services and Supply Chain, about reviewing and approving the efficacy of products in regard to “kill time” on surfaces

9. Identify and develop a plan for the safe and environmentally responsible disposal of chemicals of concern

B. Environmentally Preferable Purchasing

CHW Supply Chain Management will:

1. Request product chemistry data from suppliers

2. Prioritize chemicals of high concern for elimination

3. Create appropriate contractual obligations with manufacturers, suppliers and distributors to:
   
   (a) Avoid identified chemicals of concern
   
   (b) Disclose processes that use chemicals of concern even if the chemicals used in the processes are not a part of the end product
   
   (c) Substitute safer alternatives identified through hazard analysis

4. Develop goals and metrics to measure progress, evaluate results, and include mechanisms for sharing successes and lessons learned

5. When appropriate, communicate desired alternatives and reasons to employees, patients and the communities we serve.
C. **Advocacy**

CHW Public Policy and Shareholder Advocacy Programs will support initiatives that:

1. Ensure comprehensive hazard data are available for chemicals on the market
2. Take action to eliminate or reduce known hazards
3. Promote labeling of products with all ingredients
4. Promote a greener economy, including support for green chemistry research and education.
5. Support (legislative) initiatives for the safe and environmentally responsible disposal of chemicals of concern.
6. Inform public policies and engage in public dialogue that advances the implantation of the above policy or a comprehensive chemicals policy.