

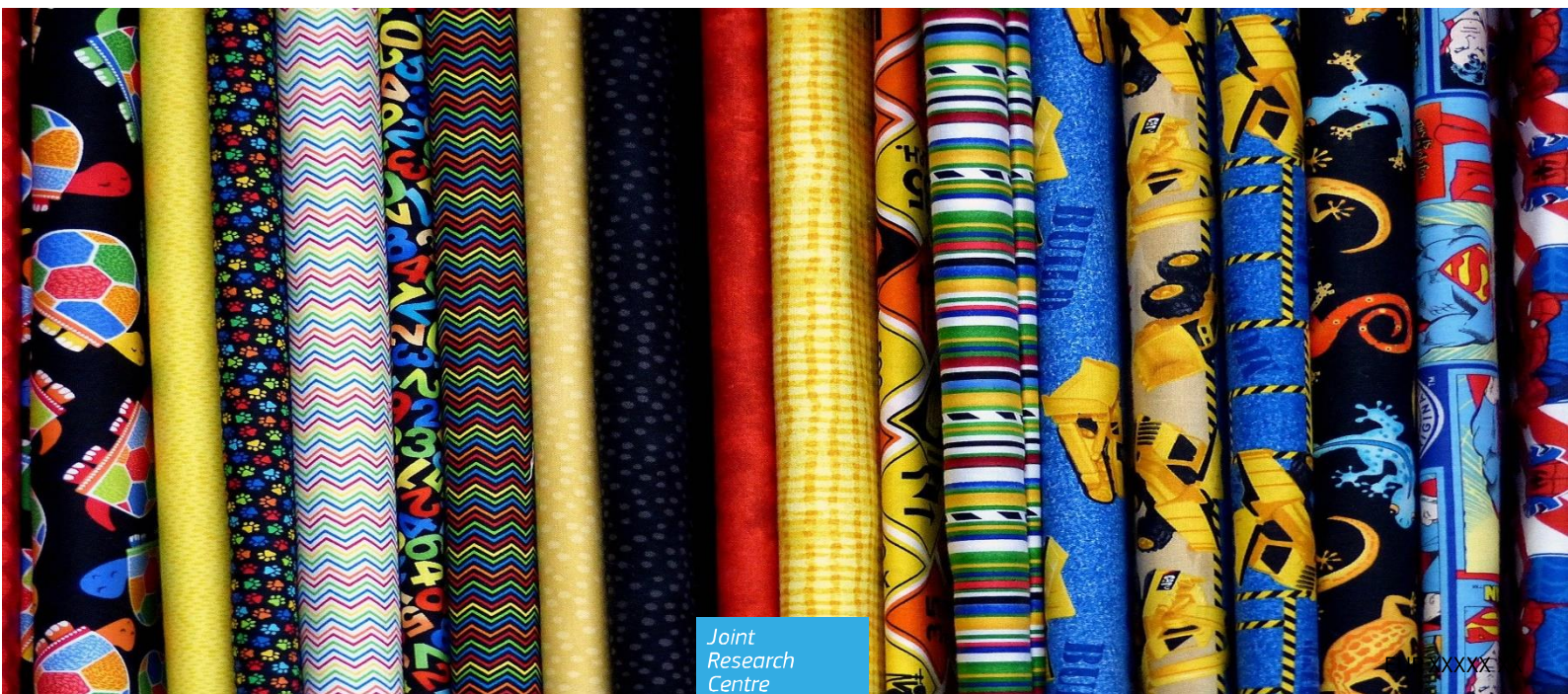
JRC TECHNICAL REPORT

EU Green Public Procurement (GPP) Criteria for Textile Products and Services

Guidance Document

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1 Introduction

This document is a guide for contracting authorities and public procurers interested in applying the EU Green Public Procurement (GPP) Criteria for Textile Products and Services ([SWD \(2017\) 231 final](#)) in their textile-related procurement procedures and tenders. However, it may also serve as an aid to those market actors who wish to submit offers to public tenders containing GPP criteria. This *Guidance Document* (referred to as 'Guidance' hereafter) is to be used in conjunction with the EU GPP textile criteria document available here: http://ec.europa.eu/environment/gpp/eu_gpp_criteria_en.htm.

This Guidance starts by providing background on the policy and regulatory framework of GPP in the EU, on the research undertaken to inform the development of this Guidance, and on the general purpose of the EU GPP textile criteria. A subsequent section offers an overview and advice regarding the different phases of the GPP process, followed by a closer look at the different EU GPP textile criteria elements. Section 6 of this Guidance uses two hypothetical tender scenarios to provide more detailed advice on how the EU GPP criteria may be selected and applied effectively. How environmental label and certifications may be used in GPP, especially for verification purposes, is discussed in Section 7. The last section examines how Life Cycle Costing may benefit the GPP process.

2 Background

The EU GPP Criteria for Textile Products and Services are a voluntary instrument for all EU Member States and public authorities, with the goal of facilitating the inclusion of environmental criteria into public tenders. To that end the GPP textile criteria draw on or relate to EU regulations/directives, of which some of the most relevant are mentioned below.

Box 1. Relevant EU Regulations and EU Directives

- Directive 2014/24/EU on public procurement and repealing Directive 2004/18/EC, the principle EU directive that regulates public procurement in general, but also addresses and promotes the integration of environmental requirements into public procurement in particular.
- Regulation (EC) No 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) and Commission Regulation (EU) 2018/675 amending the Appendices to Annex XVII to Regulation (EC) No 1907/2006 as regard to CMR substances, both adopted to improve the protection of human health and the environment from the risk that can be posed by chemicals, including potentially hazardous substances that may be used in textile production.
- Regulation (EU) No 1007/2011 on textile fibre names and related labelling and marking of the fibre composition of textile products, as the central textile and clothing legislation aimed at protecting consumer interests and eliminating potential obstacles to the proper functioning of the internal market, by ensuring that the material composition of a textile product is known, and that minimum performance requirements, and environmental aspects of textile products are complied with (e.g. the European standard CEN/TS 16822:2015 regarding self-declared environmental claims).
- Commission Decision (EU) 2017/1392 amending Decision 2014/350/EU establishing the ecological criteria for the award of the EU Ecolabel for Textile Products, a voluntary certification programme that establishes ecological criteria guaranteeing limited use of substances harmful to health and the environment, reduction in water and air pollution, as well as criteria for extending the lifetime of clothes (resistance to shrinking during washing and drying, and colour resistance to perspiration, washing, wet and dry rubbing and light exposure). To the extent possible the GPP textile criteria are closely aligned with the EU Ecolabel criteria for textile products.
- Council Regulation (EC) No 2018/848 on organic production and labelling of organic products, and Directive 2009/128/EC establishing a framework for Community action to achieve the sustainable use of pesticides, both relevant for cotton fibres used in textiles.



More information regarding relevant EU directives and policies can be found on the European Commission GPP webpage and in the Annex of the Buying Green! Handbook

2.1 Summary of technical background analysis

This section provides a brief summary about the policy context of the EU textile sector in relation to the circular economy and the EU Green Deal, as well as presenting the main findings from the technical background analysis to support the development of this Guidance for the EU GPP Criteria for Textile Products and Services.

As has been highlighted in a [briefing by the European Environment Agency \(EEA\)](#), textiles not only form a fundamental part of society and play an important part in Europe's manufacturing industry, but textile production and consumption are also responsible for significant environmental, climate and social impacts due to the use of resources, water, land and chemicals and emissions of greenhouse gases and pollutants. With the rise of 'fast fashion' and the relative fall in prices for clothing, Europeans today consume on average 26 kg and discard about 11 kg of textiles per person per year. The pressures and impacts related to clothing and other textile consumption trace back through the increasingly global and complex textile supply chains. Consequently, the EEA states that 85% of the primary raw materials use, 92% of the water use, 93% of the land use and 76% of the greenhouse gas emissions associated with textile production take place in regions outside Europe. In order to mitigate textile-related environmental pressures and impacts, a wide-scale implementation of circular economy solutions is required and needs to be supported by effective policies such as GPP.

Whether regarding resource efficiency, greenhouse gas emissions, pollution or circular economy, the new [European Green Deal](#) demonstrates the European Commission's commitment to being a global leader in the creation of a more sustainable economy and the achievement of the [United Nations Sustainable Development Goals \(SDGs\)](#). However, currently only a small percentage of textiles are being reused or recycled in order to mitigate some of the harmful environmental impacts associated with them (see [Section 3](#)). The European Green Deal stipulates a circular economy action plan that will include a 'sustainable products' policy prioritising the reduction and reuse of materials before recycling, while supporting the view that more resource-efficient technologies and a circular economy will not only contribute to greater sustainability but also offer great potential for new economic activities and jobs. Textiles are mentioned as one of the resource-intensive sectors that will receive particular attention within the circular economy action plan on issues such as the release of micro plastics from textiles abrasion, and the reusability, durability and reparability of products or recycled content.

GPP, by means of the EU GPP textile criteria, represents an important tool which already incorporates many of the necessary elements to improve the sustainability and circularity of textiles. As is stated in the European Green Deal, "public authorities, including the EU institutions, should lead by example and ensure that their procurement is green". GPP not only addresses the impacts of textile consumption associated with the public sector, but also has the potential to send strong signals into the market in general that are aimed at the development and growth of innovative, sustainable and more circular solutions in textile production and service provision which can be adopted by the private sector. Case study examples presented throughout this Guidance illustrate how the application of GPP is already contributing to the mitigation of textile-related environmental impacts.

As part of this analysis, a comprehensive comparison of the EU GPP textile criteria ([SWD \(2017\) 231 final](#)) with the criteria of other environmental labels or certifications for textile products and services was performed, the most relevant findings of which are reflected in [Section 7.2](#) of this Guidance. The current state of GPP policy in the European Member States (MS) and GPP implementation in the textile sector constituted another research focus. The results of the GPP policy and market analysis showed that, even if some MS do not yet have an official GPP policy in the form of a National Action Plan (NAP) or GPP strategy, all EU countries are engaged in the issue to varying extents. Although, in general, the EU GPP implementation target of 50% and the EU GPP Criteria remain the general reference or baseline, many MS have been developing their own national criteria and even committed to more ambitious targets. The majority of MS operate some kind of GPP textile criteria, even if they are not always aligned with the scope of the EU criteria, and the textile category may not be a priority group. Based on the very limited and often unreliable data available on textile procurement and GPP implementation levels, for the EU as a whole and for most individual EU countries, it was found that, in regard to public textile product and service procurement, about 71% of all MS are likely to remain considerably below the 50% EU GPP implementation target, whereas 11% of MS may hover around 50%, and 18% of MS have possibly achieved implementation levels in excess of 50%. This led to the conclusion that there remains considerable potential and need for improvement in this procurement sector. At the level of contracting authorities, research indicated that textile clothing and laundry services were among the most procured textile categories, which is why they receive some additional attention in tender examples contained in this Guidance. Of those authorities applying GPP criteria in their textile procurement the greatest number was found to have used criteria of GPP schemes other than the EU GPP criteria, or criteria of their own design, including references to the EU Ecolabel for textiles or other labels or certifications for textiles. Consequently, this Guidance is intended to promote and aid a more widespread and comprehensive implementation of the EU GPP textile criteria.

3 Purpose of the EU GPP textile criteria

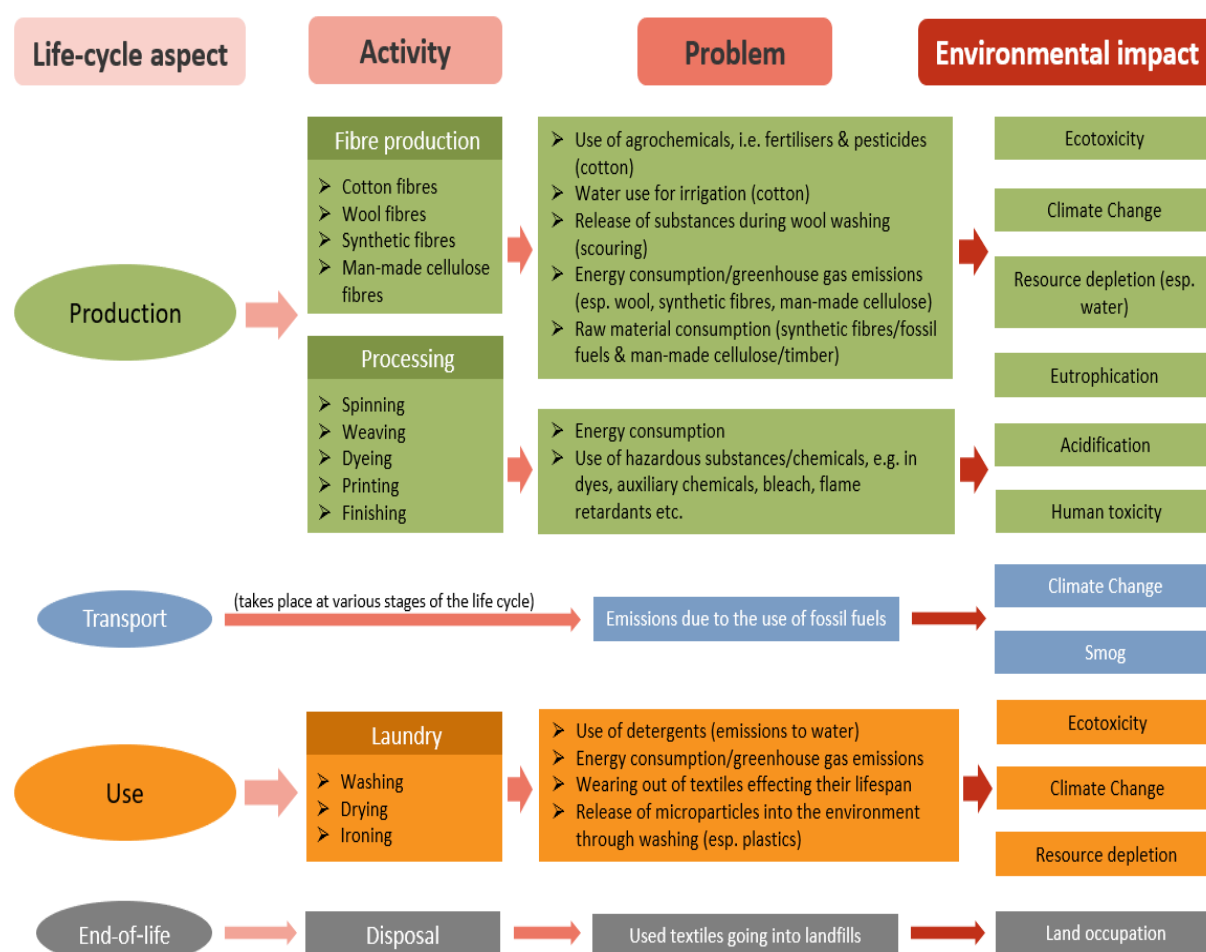
The EU GPP textile criteria are specifically designed to address the principal environmental issues along the life cycle of textile products (see **Error! Reference source not found.** below), including the activities laundry, maintenance and take-back that may be performed by a service provider. The focus is on the following categories:

- fibre sourcing;
- chemical restrictions;
- durability and lifespan extension;
- energy conservation during use;
- design for reuse and recycling.

Whether a purchase covers intermediate or final textile products, textiles for interior uses or for clothing, or textile-related services, they all can be linked to significant environmental impacts. The European Commission [Technical Report on the Environmental Improvement Potential of Textiles \(IMPRO-Textiles\)](#) has shown that most environmental impacts during the textile life cycle result from textile production, processing and use, whereas transport and the end-of-life stages were found to be of less importance in the baseline scenario considered. It is also found that reuse and/or recycling can result in a net reduction of impacts, for example through the avoidance of further resource depletion by giving textiles a second life or by the provision of recycled fibres for further use.

Figure 1 provides an overview of how some of the activities during the textile life cycle result in negative environmental impacts. This is not a complete representation but focuses on the main factors and impacts. It is also important to realise that all displayed life cycle aspects and their potential environmental impacts may be incurred indirectly via textile services, such as the rental, maintenance, laundry or take-back of textile products.

Figure 1. Potential environmental impacts during the textile life cycle



The application of the EU GPP textile criteria and Life Cycle Costing (LCC) in textile product or service procurement can help to reduce or even avoid many of the most harmful associated environmental impacts. The case studies below present examples of benefits attributed to the implementation of fibre sourcing GPP criteria in textile product procurement.

Box 2. EU GPP textile criteria and LCC [Case study 1](#)

During only 1 year of the contract the purchase of more sustainable fire station clothing (organic and recycled fibre content) in the Netherlands saved or avoided:

- ✓ 134 tonnes of CO₂
- ✓ 3 213 GJ of non-renewable energy
- ✓ 262 tonnes of toxic additives and pesticides



More information can be found [here](#)

Source PROCURA+ (2017), Case Study

Box 3. EU GPP textile criteria and LCC [Case study 2](#)

By stipulating a minimum recycled fibre content, a purchase of towels and overalls by the Dutch Ministry of Defence saved:

- ✓ 69 tonnes of CO₂
- ✓ 24 GJ of energy
- ✓ 233 million litres of water



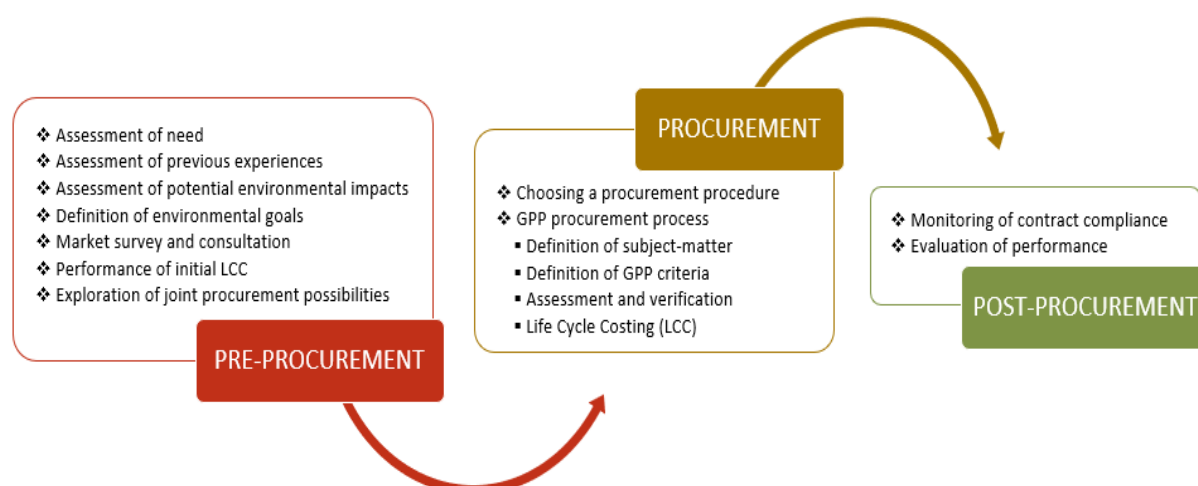
More information can be found [here](#)

Source PROCURA+ (2018), Case Study

4 Guidance on procurement by phase of activity

This section offers guidance for each procurement process phase on how you may approach textile product or service procurement with a reduced environmental impact (Figure 2). It is important though to recognise that each procurement process has to be viewed within its particular context, which may result in different procedural and legal requirements, as well as limited applicability of some of the suggested process steps. For more detailed guidance on general and green public procurement, please refer to resources such as the EU public procurement directive ([Directive 2014/24/EU](#)), the [Buying Green! Handbook](#) and this [Public Procurement Guidance for Practitioners](#) published by the European Commission.

Figure 2. GPP process phases and activities



4.1 The pre-procurement phase

The preparation stage of a procurement procedure is of central importance and, if well executed, may lead to better results and the avoidance of unsuccessful tenders. Depending on the nature of the intended purchase, this phase may involve a number of interacting steps, some of which are presented below. It is crucial to plan in sufficient time to properly perform these steps.

4.1.1 Assessment of need

Before starting a new procurement process for textile products or services, it is advised to not only assess and define exactly what is needed (e.g. quantity and characteristics), but also whether it is actually needed at all. For example, before considering the purchase of a new textile product, one may consider repair or reuse of existing resources. This would not only save costs and resource-consuming procurement procedures but also avoid unnecessary environmental impacts and promote a more circular economy.

4.1.2 Assessment of previous experiences

It can be very useful and informative to evaluate previous procurement procedures and product/service performance, in order to learn from past experiences and optimise the process. This could also involve consultation or information exchange with external stakeholders, such as other contracting authorities or technical experts¹.

4.1.3 Assessment of potential environmental impacts and definition of environmental goals

Once a procurement subject has been decided, it can be helpful to gain at least a broad understanding of the potential environmental impacts associated with the textile product or service that one intends to purchase. Sources of information for such an assessment may include:

- [The EC IMPRO-Textiles report](#) (2014);
- [The Technical Report on the Revision of the EU GPP Criteria for Textile Products and Services](#) (2017);
- [The ECAP report on Mapping clothing impacts in Europe: the environmental cost](#) (2017).

Together with any GPP or sustainability policy that an organisation may have, the environmental assessment would build the basis for the definition of environmental goals that the procurer wants to set for the procurement procedure.

4.1.4 Market survey and consultation

In the [Buying Green! Handbook](#) one can learn more about how to engage with the market before and during the procurement procedure without violating the stipulations of the EU public procurement directive ([Directive 2014/24/EU](#)). For example, in order to ensure fair competition, the procurer may openly announce a preliminary market consultation process by publishing a prior information notice. A market survey and consultation process focused on the textile product or service group that is required can help overcome potential market barriers, as well as offer other benefits. Some of these potential benefits include:

- ✓ awareness about the nature, cost and availability of current market solutions, including green and innovative alternatives;
- ✓ overview of potential suppliers;
- ✓ a clearer understanding of potential environmental impacts associated with the desired product or service;
- ✓ awareness of market readiness to comply with the procurer's requirements may help to better define the subject matter and environmental criteria in order to avoid complications or unsuccessful tenders;
- ✓ time for the market to prepare for procurer demands, maybe even stimulating new innovative solutions.

Depending on the subject and characteristics of the particular textile product or service procurement, the market survey or engagement may evolve around issues, such as:

- the market availability of organic cotton-based products;
- the availability, attributes and potential uses of other/alternative fibre types or mixes;
- the source of textile fibres and products offered in the market;

¹ For example, check out [Procura+](#), one of the biggest sustainable procurement networks in Europe.

- the use or potential use of recycled materials;
- the recyclability of textile fibres or products;
- the availability of environmentally friendly service solutions.

Box 4. Case study 3: Organic cotton jumpers for Masaryk University (Czech Republic)

A call for tender by the Masaryk University for jumpers containing a minimum of 95% organic cotton failed because no bidders could fulfil the requirement. A subsequent market dialogue revealed that this was due to time constraints relating to supply chain contracts and bid preparation. A second call for tenders, requesting a minimum of 80% was successful.

Important lessons:

- preliminary market research can help to save time and achieve better results;
- knowledge of the market situation may allow you to better design your GPP criteria, e.g. setting more realistic minimum requirements;
- allow for sufficient time so that potential suppliers can undertake the steps necessary to achieve compliance;
- an organic product can be procured for comparable prices to regular products.



More detailed information about this case study can be found [here](#)

Source: European Commission (2018), GPP In practice Issue no. 81

4.1.5 Performance of an initial LCC

Where relevant, the performance of an initial Life Cycle Costing (LCC) for an intended textile product purchase during the preparation stage can give a better idea of the costs that can be expected during the various life cycle stages of the product, including potential textile-related services that may be contracted. Although the outputs of LCC have no direct influence on the level of environmental impacts, they may help the procurer to define GPP criteria in a way that aims at reducing costs apart from environmental impact improvements. LCC is discussed in greater detail in [Section 8](#) of this document.

4.1.6 Exploration of joint procurement possibilities

Combining procurement needs with those of other contracting authorities via a joint procurement process may facilitate savings through bulk buying, reduced administrative costs, and pooling environmental, technical, and market knowledge regarding green textile products or services.

4.2 The procurement phase

4.2.1 Choosing a procurement procedure

At the outset of the actual procurement process, it is necessary to choose the most adequate procedure for each particular tender. The procurement procedures foreseen in the EU public procurement directive ([Directive 2014/24/EU](#)) include open procedure, restricted procedure, competitive procedure with negotiation, competitive dialogue and innovation partnership. The latter three offer more flexibility than open or restricted procedures, making them a potential choice for more complex procurement contracts. The choice of procedure impacts on who will be able to compete, and when and how the contracting authority will be able to apply environmental criteria or considerations (see the [Buying Green! Handbook](#) or the [Public Procurement – Guidance for Practitioners](#) for more advice).

Box 5. Case study 4: Sustainable fire station clothing in the Netherlands

After having conducted a market study, the contracting authority decided to use a restricted procurement procedure involving a group of companies preselected for their experience of using recycled and organic fibres, and ability to influence production. This approach minimised costs for the parties involved and ensured the readiness of bidders to comply with requirements.



More information can be found [here](#)

Source: PROCURA+ (2017), Case Study

4.2.2 The GPP process

A GPP process involves some additional steps or aspects that should be considered and applied with care. GPP may also add to the complexity of a tender, so it is vital to plan in sufficient time for the tasks of the contracting authority, as well as for the responses of bidders.

Definition of subject matter

The subject matter of a contract defines not only what textile product or service is to be procured but may also include functional or performance-based definitions, for example regarding environmental aspects. Consequently, the subject matter provides essential information to potential bidders, but also determines the permissible scope of specifications and other criteria that may be used in the tender. Although the procurer is in principle free to define the subject according to need, this must be done in a clear, neutral, and non-discriminatory fashion to avoid confusion and unjustified obstacles to competition. If in the specifications of the subject matter reference to a particular standard or label cannot be avoided, the contracting authority should clearly indicate that equivalents will also be accepted, by adding the words 'or equivalent' in line with Article 42 of the EU public procurement directive ([Directive 2014/24/EU](#))²

Definition of GPP criteria

Building on the pre-procurement process, the procurer should be in a position to define the GPP criteria for the particular tender and include them in the tender documentation. At this point, the procurer may refer to the EU GPP Criteria for Textile Products and Services as a central source for potential environmental criteria, even if the suggested criteria may need to be adapted according to need and preference. Alternatively, the procurer may also consider the use of environmental labels and third-party certification schemes, such as the EU Ecolabel, as a reference for individual GPP criteria. In any case, it is important that all environmental specifications or requirements are clearly linked to the subject matter of the tender. [Section 5](#) of this Guidance gives an overview of the elements and tools offered by the EU GPP textile criteria, and [Section 6](#) provides two specific tender examples that illustrate how the EU GPP criteria may be used in the context of a textile product or textile service procurement. [Section 7](#) offers information regarding how one may use existing environmental labels in relation to GPP criteria.

Assessment and verification

Assessing and verifying that the GPP requirements of the tender are being complied with is crucial to ensure the success of the procedure and the achievement of the overall environmental objectives. This may happen at various stages during the procurement process, from the selection of tender participants down to the delivery of the textile product or service. In any case, it is important to clearly specify verification requirements in connection with each GPP criterion in the tender documentation, including what evidence needs to be provided and when. Required evidence may include things such as:

- test reports, e.g. on fibre attributes and quality;
- monitoring data, e.g. regarding emissions on textile production sites;
- ecolabels/third-party certification;
- transaction records, e.g. to allow tracing of fibre content in textiles back to the point of certification;
- REACH declarations;
- description of systems in place, e.g. regarding quality or energy management;
- user instructions, e.g. on how to remove or overprint logos or branding on textiles;

² This also applies to technical specifications in general, and to verification requirements relating to technical specification.

- written commitments, e.g. regarding the future availability of spare parts and accessories;
- past experience descriptions, e.g. regarding the management of compliance within the supply chain.

It must be respected though that Article 43 of the EU public procurement directive ([Directive 2014/24/EU](#)) stipulates that contracting authorities requiring a specific label shall accept all labels that confirm that the supplies or services meet equivalent label requirements. Should tenderers, for acceptable reasons, not be able to obtain a specific or equivalent label, other appropriate means of proof shall be accepted, for example a technical dossier from the manufacturer. Leaning on the EU GPP textile criteria document, [Section 6](#) of this Guidance illustrates and further details how to deal with verification issues in connection with two specific tender examples. Furthermore, [Section 7](#) discusses some of the most relevant textile labels and certification schemes, and how they may relate to the individual EU GPP textile criteria.

Life Cycle Costing (LCC)

At the award stage of the procurement procedure, a more thorough LCC based on the information provided by bidders can provide a comprehensive picture of the overall life-cycle costs of a textile product or service. This can be particularly valuable in scenarios where several bidders fulfil all the requirements of the tender, and the contracting authority needs a tool that allows a comparison looking beyond the initial purchase price. Any additional data requirements in that regard would have to be specified in advance in the tender documentation. LCC is discussed in greater detail in [Section 8](#) of this document.

4.3 The post-procurement phase

4.3.1 Monitoring of contract compliance

Particularly in regard to services, but also to textile product contracts that involve, for example, re-occurring deliveries or delivery in stages, it is necessary to ensure continued compliance with tender requirements. Among other things, this may involve periodic reports, test results, site visits or a third party as a monitor. However, such performance-stage requirements, including potential sanctions in case of violation, need to be specified clearly in the tender documentation as contract performance clauses (CPC). Chapter 6 of the [Buying Green! Handbook](#) provides more detailed information about CPC and the monitoring of compliance.

4.3.2 Evaluation of performance

After the procurement phase, when the contracting authority has gained some experience with the contracted product or service it may want to evaluate the performance in relation to the initial environmental goals. This may provide insights that, if necessary, could help improve future procurements.

5 Understanding the EU GPP textile criteria elements

As exemplified by Figure 3 below, the EU GPP criteria offer both core and comprehensive criteria categories, for each of which a specific toolset (selection criteria (SC), technical specifications (TS), award criteria (AC) and contract performance clauses (CPC) is suggested. The choice of category and toolset may depend on aspects, such as an organisation's ambition, environmental objectives, available resources (e.g. time or personnel), and the nature of the purchase itself. As will be illustrated in later tender examples, some tools may not be suitable considering the nature of the intended purchase or tender. The suggested criteria tools can be used in a flexible and complementary way to achieve the overall environmental goals.

Figure 3. Excerpts from the EU GPP textile criteria document with clarifications

The left column of the table with EU GPP criteria suggestions lists the **Core criteria**, which are designed to allow easy application of GPP, focusing on the key area(s) of environmental performance of a product and aimed at keeping administrative costs for companies to a minimum.

The right column of the table lists the **Comprehensive criteria**, which cover more aspects or require higher levels of environmental performance. They may be used by authorities that want to go further in supporting environmental and innovation goals. In some cases, the same criterion applies to both levels (core and comprehensive).

Here it is indicated which type of criteria tool is being referred to, in this case a **Technical Specification (TS)**. Other available tools are **Award Criteria (AC)**, **Selection Criteria (SC)** and **Contract Performance Clauses (CPC)**.

- **TS** are minimum compliance requirements relating to the characteristics of the textile product or service, which must be met by all tenders.
- **AC** can be used to stimulate additional environmental performance improvements without being mandatory, and therefore without foreclosing the market for products or services not reaching the proposed level of performance.
- **SC** allow contracting authorities to request specific competencies and/or management systems relating to environmental aspects of textile products or services.
- **CPC** specify how a contract must be carried out.

Footnotes provide references, further clarifications, or links to external sources of information.

There are occasional additional explanatory notes that provide explanations and guidance on specific topics related to the scope and application of criteria.

Core criteria	Comprehensive criteria
3.1.2 Textile fibres	
TECHNICAL SPECIFICATIONS	
TS1. Cotton fibres A minimum of 20 % of the content of cotton goods used to fulfil the contract must be either: <ol style="list-style-type: none">1. Organic: grown according to the requirements laid down in Regulation (EC) No 834/2007,⁴ the US National Organic Programme (NOP) or equivalent legal obligations set by trade partners of the EU; or2. Integrated Pest Management (IPM): grown according to IPM principles as defined by the UN Food and Agricultural Organisation (FAO) IPM programme⁵ or EU Directive 2009/128/EC⁶ Verification: The cotton origin and content of the goods will be verified upon delivery by means of a third party certification scheme for IPM or organic cotton production together with documented transaction records that allow for the cotton content of individual items or batches of goods to be verified and traced back to the point of certification. This includes valid certification for organic or IPM production, ⁹ as well as documentation of transactions that demonstrate the purchase of the claimed cotton content and provide traceability. If relevant, a screening test ¹⁰ to verify non-genetically modified cotton will be provided upon request if conventional and IPM cotton are blended with organic cotton.	TS1. Cotton fibres A minimum of 60 % of the content of cotton goods used to fulfil the contract must be either: <ol style="list-style-type: none">1. Organic: Grown according to the requirements laid down in Regulation (EC) No 834/2007⁴, the US National Organic Programme (NOP) or equivalent legal obligations set by trade partners of the EU or2. Integrated Pest Management (IPM): Grown according to the principles as defined by the UN Food and Agricultural Organisation (FAO) IPM programme⁵ or EU Directive 2009/128/EC⁶, or Verification: The cotton origin and content of the goods will be verified upon delivery by means of a third party certification scheme for IPM or organic cotton production together with documented transaction records that allow for the cotton content of individual items or batches of goods to be verified and traced back to the point of certification. This include valid certification for organic or IPM production ⁹ , as well as documentation of transactions that demonstrate the purchase of the claimed cotton content and provide traceability. If relevant, a screening test ¹⁰ to verify non-genetically modified cotton will be provided upon request if conventional and IPM cotton are blended with organic cotton.

⁸ See <http://www.isaaa.org/gmapprovaldatabase/countrylist/default.asp>.

⁹ At the time of writing the following schemes are considered to provide sufficient assurance: IPM: the Better Cotton Initiative (BCI), AGRO 2 (Greece), Cotton Made in Africa, Fair Trade, the Australian Better Management Programme (BMP); Organic: EU recognised organic control bodies, US organic programme, IFOAM.

Explanatory note: Supporting the market for organic cotton
The limited availability of organic cotton on the world market can pose a challenge for public contracts. On the other hand, public contracts can play an important role in creating demand. To address this challenge it is therefore recommended that early market consultations and/or prior information notices are used to notify potential bidders of upcoming contracts and the likely volumes of cotton textiles required.

This section indicates the focus category of the criteria, in this case textile fibres. This is for reference only.

In this section the actual criteria are outlined (core and/or comprehensive), including details regarding requirements or possible variants, clarifications or specific advice. In this case, minimum requirements are set regarding the characteristics of a fibre type (cotton) contained in the textile product to be procured.

Below each criterion is a section addressing verification requirements, which are specific conditions that the tenderer must ensure are met/fulfilled by the product or service to be procured. It is specified what evidence of compliance shall be provided, as well as how and when. Where applicable, this may include accepted test methods/bodies, or certifications/labels.

6 Choosing and applying the right criteria and tools for textile product or service procurements

This section will provide two potential tender scenarios of how the EU GPP textile criteria may be used in the context of textile product or service procurement. Where possible, the EU GPP criteria suggestions are related to real-life case studies, which can serve as further inspiration or guidance. At the very end of this Guidance is a reference and resource section, which points out some of the most prominent sources for GPP case studies.



Each procurement procedure is likely to have its particular characteristics, needs and context, and hence requires a customised set of GPP criteria. For example, the tender subject may include certain functional, safety or visual/aesthetic requirements, such as flame retardancy or a particular textile colour, which may impact on the applicability of some criteria. Also, it is important to remember that the EU GPP criteria are guiding recommendations, and not limitations to ambition levels.



TENDER EXAMPLE 1

Subject matter of the contract: T-shirts with a reduced environmental impact

Note This tender scenario presumes a one-time contract for a large number of T-shirts.

General issues: Referring to specific environmental attributes at this stage should be avoided (eg. T-shirts made with organic cotton), to not restrict the environmental criteria the contracting authority may want to apply.

Selection criteria: None

Note Used here only for instructive purposes, and hence not required in tender documentation.

General issues: The use of selection criteria needs to be proportional to the nature of the contract. In this scenario with a one-time contract of relatively low economic volume, it may not be justifiable to set requirements for supply chain or other management systems. If it can be justified by the size and nature of the contract, the contracting authority may want to make sure at the outset that the supplier has the necessary system and capabilities (i.e. resources, expertise, documentation procedures, etc.) in place in order to fulfil monitoring and verification requirements regarding the textile fibre origin. This can be done by applying the relevant selection criterion of the EU GPP textile criteria (SC1. Suppliers of textile products).

Technical specification 1: (relating to EU GPP Criterion TS1. Cotton fibres/Comprehensive criteria)

A minimum of 60% of the cotton content covered by the contract must be either:

1. Organic: Grown according to the requirements laid down in Regulation (EC) No 834/2007, the US National Organic Programme (NOP) or equivalent legal obligations, or
2. Integrated Pest Management (IPM): Grown according to the principles as defined by the UN Food and Agricultural Organisation (FAO) IPM programme or EU Directive 2009/128/EC.

Verification requirements: Upon delivery of the goods, provision of a valid certification for organic or IPM production, as well as documentation of transactions that demonstrate the purchase of the claimed cotton content and provide traceability. Acceptable certification schemes and bodies include: Organic EU recognised organic control bodies, US organic programme, IFOAM or equivalent; IPM: Better Cotton Initiative (BCI), Cotton Made in Africa, Fair Trade or equivalent.

Note: A list of recognised EU organic control bodies can be found [here](#)

General issues: Technical specifications (TS) need to relate to the characteristics of the textile product or service that is to be purchased and cannot refer to the general capacities or qualities of the potential supplier. TS must not create unjustified obstacles to competition.

Suggestion: Considering a scenario where required T-shirts are made of 80% cotton and 20% other fibres, this criterion only applies to the actual cotton content. IPM cotton is suggested by the EU GPP criteria as a variant to organic cotton since it also offers considerable environmental benefits regarding the avoided use of agrochemicals. In this [Technical Report](#) (Chapter 2.1.2.1 Cotton fibres) there is more detailed information on cotton fibres in general, and organic and IPM cotton in particular. If the contracting authority does not wish to purchase products containing GM cotton, this needs to be explicitly addressed, including adding relevant verification as suggested in the criteria document. This may be done by either requiring only organic cotton (which is GM-free), by directly disqualifying GM cotton, or a combination of both, as exemplified by this [case study from the Czech Masaryk University](#). This case study also indicates that a very high organic cotton content can be feasible. Alternatively, one could opt for a lower minimum organic/IPM requirement while motivating and rewarding better performance through award criteria, as indicated below.

Verification issues: It is important that the contracting authority specifies relevant regulations or principles, as well as acceptable certification schemes for organic and IPM production verification to assure matching interpretations and adequate performance. The contracting authority may use specific technical standards, labels, and the EU or national GPP criteria as direct references or sources for developing technical specifications but must allow for equivalent means of compliance by adding the words 'or equivalent', in line with the EU public procurement directive ([Directive 2014/24/EU](#)).

Suggestion: In the case of this particular TS, the contracting authority could also specify the [EU Ecolabel](#) (based on [Commission Decision 2014/350/EU](#) and amendment [Commission Decision 2017/1392/EU](#)), the [Global Organic Textile Standard](#) (GOTS) Version 5.0, and the [Blue Angel](#) (considering [Textiles Basic Award Criteria](#) from 2017), or equivalent, in the tender documentation as acceptable evidence of compliance. The [Blue Angel for Textiles](#) (July 2017, Version 1.2) requires that all natural fibres are 100% organic, the current [GOTS Version 5.0](#) would guarantee a minimum of 70% organic cotton fibre content, and the EU Ecolabel for a T-shirt would imply a minimum of 95% organic cotton or 60% IPM grown cotton. Any tender offer including one of these certifications would require no further verification. Other labels, such as the [OEKO-TEX 100](#) certification (Edition 03.2019), or the [Nordic Swan for textiles](#) (Version 4.10), may also be valid if containing additional specifications regarding the organic content of the certified product (i.e. 'organic' or 'organic cotton').

Technical specification 2: (EU GPP Criterion TS4. Polyester recycled content/Comprehensive criteria)

Polyester fibres used in fulfilment of the contract must be manufactured using a minimum recycled content of 20%.

Verification requirements: Upon award of the contract the tenderer must demonstrate that the production line(s) for the fibre product are dedicated to production with the minimum recycled content. Third-party certification of the recycled content and its traceability shall be provided for the production line of the product to be delivered and the recycle feedstock. ISO 14021, ISO 9001 or equivalent may be used. The verification must provide information in accordance with Part 4.4 of EN 15343.

Comment: Presuming that the T-shirts to be procured contain polyester fibres to improve performance, this criterion stipulates a minimum recycled content for polyester used in the product. The contracting authority may need to consider to what extent recycled polyester can be used without compromising other quality specifications required in the contract. This could be done during the evaluation of the tenders, or at an earlier stage through market research or dialogue. By not specifying the origin of recycled polyester (e.g. pre- or post-consumer waste), one allows for more flexible solutions that best suit the tenderer and the quality requirements of the product.

Verification issues: In addition to the suggested standards and verification methods, there is only limited possibility to verify this criterion directly through Type 1 ecolabels or other certifications. The GOTS (Version 5.0) permits a polyester content of up to 30% in a product, of which a 100% would need to originate from recycled pre- or post-consumer waste. Consequently, a GOTS certification could be accepted as proof of compliance. Textile products with the EU Ecolabel (based on Commission Decision 2014/350/EU and amendment Commission Decision 2017/1392/EU) or the Blue Angel (considering Textiles Basic Award Criteria from 2017, Version 1.2) may feature a minimum of recycled polyester fibres (50% for staple fibres and 20% for filament fibres) from pre- and/or post-consumer waste, but since this is optional further assessment into the technical details of the label would be required. A product with the EU Ecolabel may display additional text alongside the label communicating the recycled content claim (e.g. 'Made with xx% of recycled polyester'), which would be acceptable proof of compliance.

Technical specification 3: (EU GPP Criterion TS5. Declaration for REACH Candidate List substances)

The tenderer must declare the presence of any REACH Candidate List substances at a concentration higher than 0.1% (weight by weight) in the finished product.

Verification requirements: The tenderer must provide a valid REACH Article 33(2) declaration upon delivery of the finished article. If Candidate List substances are present, they must be identified.

General issues: As specified, the tenderer, as the supplier of finished textile articles, is the actor required to present the required information. For that purpose, the tenderer may rely on testing of the final product or, more likely, on inputs from the various actors and processing steps throughout the supply chain. Such inputs may consist of safety data sheets (SDS) for hazardous substances/chemical compounds which are used in different processes and could remain in the final product (e.g. dyes, auxiliary chemicals, bleach, flame retardants, etc), or REACH declarations for fibre products used in final textile articles. In Annex 1 you can see an example of how a REACH declaration for a finished product(s) may look in the absence of Candidate List substances above the indicated concentration. Where Candidate List substances are present in the finished product above the 0.1% limit, the declaration would have to be modified and include at least the names of the substances concerned.

Suggestion: The [European Chemicals Agency](#) (ECHA) is the EU organ responsible for implementing [Regulation \(EC\) No 1907/2006 of the European Parliament and of the Council on the Registration, Evaluation, Authorisation and Restriction of Chemicals](#) (REACH). Among other things, this Regulation applies to chemical substances that are known to cause harm, or that may cause harm to human health and/or the environment, including those that may be present in textile articles. The [REACH Candidate List of substances of very high concern](#) (SVHC) contains substances that are being considered for inclusion into the Authorisation List in REACH Annex XIV. These Candidate List substances are not necessarily hazardous but may nonetheless have undesirable properties that the consumer may want to avoid. According to REACH Article 33(2), any supplier to the EU consumer market, both from within and outside the EU, is, upon request, obligated to provide the consumer with sufficient information, available to the supplier, to allow safe use of the article including, as a minimum, the name of that substance, but only if the concentration of individual REACH Candidate List substances is above 0.1% weight by weight.

Verification issues: The only way for the contracting authority to properly verify the supplier's declaration about the presence or absence of REACH Candidate List substances would be by means of analytical testing on the delivered product, or test results provided by the supplier. However, not all Candidate List substances are relevant for textiles, and even partial testing would involve a considerable effort, which could be interpreted as a disproportional requirement for the tenderer. Therefore, during the last revision of the EU GPP Criteria for Textile Products and Services in 2017, it was deemed sufficient for the fulfilment of the criterion and verification requirements that a formal REACH declaration is provided.

Suggestion: The environmental label Blue Angel (criteria from 2017) and the OEKO-TEX 100 certificate (Edition 03.2019) could both serve as additional evidence that SVHC substances have been considered. In products with the EU Eco label (Commission Decision 2014/350/EU and amendment Commission Decision 2017/1392/EU), the Nordic Swan (Version 4.10) and GOTS (Version 5.0), the presence of SVHC above the concentration stated in this criterion is prohibited, and consequently a REACH declaration or testing should not be necessary.

Award criteria:

Bids will be assessed according to the following award categories and weightings:

- Price (60%)
- Quality (30%)
- Environmental performance (10%)

No te: The award categories and weighting stated here are an example and do not form part of the EU GPP textile criteria.

General issues: If environmental award criteria are used these must be clearly advertised and verifiable. They should be specific but without discriminating against any potential competitor. The award criteria need to be directly linked to the subject matter of the contract, ensure the possibility of effective competition, and cannot confer an unrestricted freedom of choice on the contracting authority. This means that, although there is no set maximum on the weighting given to environmental criteria, the chosen weighting and point allocation system, which is to be used for the award stage, needs to be clearly specified in the contract notice and tender documents.

Suggestion: To determine an appropriate weighting for the environmental award category, as well as individual environmental award criteria (if multiple are used), one may consider aspects such as:

- the importance of environmental objectives for the contract in relation to other considerations such as price (or cost) and general quality;
- the extent to which environmental aspects are already addressed in the technical specifications.

If, as in this tender example, environmental requirements in the technical specifications are already relatively high, then award criteria may be given a lower weighting. For more details and advice regarding award criteria, weighting approaches, and the award stage in general, please refer to Chapter 5 of the [Buying Green! Handbook](#). In line with the determination of the most economically advantageous tender (MEAT), an environmental category in the award criteria can be a very useful tool to allow the contracting authority to introduce and reward additional or more stringent environmental criteria, instead of directly excluding non-compliant tenderers. This especially makes sense in a context where there is uncertainty about the cost and/or availability of textile products that meet the desired environmental criteria.

Award criterion: (EU GPP Criterion AC1. Cotton fibres)

In regard to the environmental performance assessment, 2.5 points will be awarded in proportion to each 10% improvement upon the minimum technical specification of certified IPM or organic cotton content.

Verification requirements: The same as for the cotton fibre technical specification.

Note: The reward points stated here are an example and do not form part of the original EU GPP criterion. They may be adjusted according to factors such as the weighting of the main award categories (as indicated above), the importance placed on the criterion by the contracting authority or the overall number of GPP award criteria used.

General issues: If the minimum criteria in the TS are too high (e.g. 100% organic cotton content) the contracting authority may not receive any valid offers.

Suggestion: Unless it is certain that the market can meet the contracting authority's procurement demands (e.g. through prior market analysis), it may be more effective to set lower/more realistic minimum requirements and use the award criteria as a tool to promote and reward better performance. In a highly competitive market context where many actors offer very similar conditions, this criterion may motivate extra efforts without compromising the success of the tender. This tender example has a 60% minimum requirement for organic/IPM cotton, so this award criterion addresses the remaining 40%. For this purpose, these 40% are divided into four blocks, each worth 2.5 points to reach a total of 10 points that corresponds with the 10% weighting of the environmental performance award category.

Verification issues: Only the Blue Angel label for textiles ([July 2017, Version 1.2](#)) directly guarantees an organic natural fibre content of 100%. All other labels or certification schemes that were introduced earlier under TS 1 (EU Ecolabel, GOTS, Nordic Swan and OEKO-TEX 100) would require further assessment, unless product labels feature additional satisfactory specifications regarding the organic cotton content.



TENDER EXAMPLE 2

Subject matter of the contract: Laundry service for hospital linen (towels and bed sheets) and clothing with a reduced environmental impact

Note: This scenario presumes a longer-term or framework contract of considerable volume, as otherwise some of the suggested GPP criteria (e.g. selection criteria) may not be justifiable as proportional.

Selection criterion: (EU GPP Criterion SC1. Providers of textile services/Comprehensive criteria)

Tenderers must be able to demonstrate the resources, expertise, documented procedures and management system that they have in place in order to address the following aspects of the laundry service to be provided:

- At laundry sites the implementation of energy management systems according to ISO 50001 or equivalent and including:
 - staff training and awareness programmes at each site;
 - equipment and procedures at each site in order to maximise process energy efficiency;
 - sub-metering that allows for the management and reporting of specific energy consumption for the laundry processes and type of textiles handled at each site (i.e. electricity, gaseous liquid fuels consumed expressed in kWh/kg of textile product).

Verification requirements: Tenderers must confirm that they have the required system and capabilities. Relevant examples from previous contracts must be compiled. Moreover, they must describe the internal resourcing, management systems and infrastructure that will be used to manage compliance and provide the service. Where deemed appropriate, the contracting authority reserves the right to carry out site visits and inspections, or to request third-party inspections to confirm the tenderer's capabilities.

General issues: Since this tender example refers to a relatively large and long-term contract, the inclusion of a selection criterion and process can be justified as proportional regarding efforts required by both parties. In this criterion it is important to specify the required standard for the energy management system in order to avoid diverging interpretations of what should be covered. However, in line with the EU public procurement directive ([Directive 2014/24/EU](#)), the use of 'equivalent' standards needs to be allowed in order to avoid unfair discrimination.

Verification issues: If a management system relating to a standard different from the ISO 50001 is presented, it will be up to the contracting authority to evaluate whether it fulfils the requirements.

Suggestion: The sub-criteria presented in the criterion text (i.e. staff training, equipment and sub-metering etc.) may serve as focus points for an evaluation of alternatives. If there are any doubts about the quality and scope of the energy management system, e.g. in cases where the system has been implemented only recently, or where insufficient records have been provided, the contracting authority may want to reserve the right to ensure capabilities via site visits and inspections. A qualified third party may be engaged for that purpose if necessary.

Technical specifications: None

Note: Used here only for instructive purposes, and hence not required in tender documentation.

Comment: The relevant technical specification for laundry services (TS1. Fabric selection to minimise energy use for drying and ironing), as suggested by the EU GPP Textile Criteria document, only applies to cases where the textile product itself is provided externally (i.e. renting), either with or without a laundry service as part of the contract. Where the ownership of the textile product lies with the contracting authority, this issue may be addressed directly in the product procurement process (TS9. Fabric selection to minimise energy use for drying and ironing).

Award criteria:

Bids will be assessed according to the following award categories and weightings:

- Price (60%)
- Quality (20%)
- Environmental performance (20%)

Note: The award categories and weighting stated here are an example and do not form part of the EU GPP textile criteria.

General issues: See award criteria comments in Tender Example 1.

For this tender example, a higher weighting was chosen for the environmental performance category, since in the absence of technical specifications the award criteria are of greater importance in regard to the achievement of the overall environmental objectives.

Award criterion 1: (EU GPP Criterion AC1. Specific energy consumption/Comprehensive criteria)

In regard to the environmental performance assessment, up to 15 points will be awarded according to the proposed specific energy consumption in kWh (electricity plus gaseous liquid fuels) per kg of hospital linen and workwear textile product washed, dried and finished (as appropriate) that will be achieved during the provision of the service. The points will be awarded in linear proportion to the proposal received, from the lowest performance (zero points) to the highest performance (15 points).

Verification requirements: The tenderer will provide specifications for the sub-metering of each washing, drying and finishing process line, distinguishing between linen and workwear that will be used in providing the service. They will also describe the arrangements for verification of the sub-meter readings.

Note: The reward points stated here and in the other award criterion are an example based on the recommendation provided in the EU GPP textile criteria document. However, they may be adjusted according to factors such as the weighting of the main award categories (as indicated above), the importance placed on the criterion by the contracting authority or the overall number of GPP award criteria used.

General issues: As discussed in this [Technical Report](#) on the revision of the EU GPP criteria for textile products and services, industrial laundry sites may vary significantly regarding their specific energy or fuel consumption. For that reason, this award criterion can be very helpful in identifying and rewarding more energy-efficient tender offers, without limiting participation in the tender procedure based on predefined performance requirements or methods, as would be the case with a technical specification. The criterion distinguishes between linen (here towels and bed sheets) and workwear (here hospital clothing), since they may require different laundry procedures (e.g. washing or drying temperatures, or ironing). This criterion also links back to the selection criterion regarding energy management systems, as it evaluates the effectiveness and performance of such a system regarding a central aspect (i.e. energy consumption per kg of textile).

Verification issues: Tenderers complying with the earlier selection criterion should experience few or no problems with the verification requirements, since the necessary tools, procedures and even documentation are likely to already be in place. A greater administrative effort may be required if the service provider operates various laundry sites, as verification would be necessary at the level of the individual process lines at each site used to provide the textile service. Also, since the verification requirements represent a commitment, but not actual proof of compliance, this award criterion should be used in connection with a corresponding contract performance clause as indicated below.

Award criterion 2: (EU GPP Criterion AC2. Detergent environmental impact/Comprehensive criteria)

Tenderers will be awarded 5 points if they commit to the use of detergents in the execution of the contract that meet the aquatic toxicity and biodegradability criteria of the EU Ecolabel for Industrial and Institutional Laundry Detergents or their equivalent

The criteria can be found here: <http://ec.europa.eu/environment/ecolabel/products-groups-and-criteria.html>.

Tenders making the commitment will be awarded 5 points.

Verification requirements: The tenderer must provide details of the system of verification to be used for the purchase of compliant detergents for use in the individual washing process lines that will provide the service.

Note: The EU Ecolabel for Industrial and Institutional Laundry Detergent referred to here relates to [Commission Decision \(EU\) 2017/1219](#).

General issues: Efforts to reduce the energy consumption by lowering washing temperatures (as promoted by the previous selection and award criteria) may result in a counterproductive increase in the amount of detergent used or the use of more aggressive detergents, as a compensatory measure. Therefore, this award criterion can be introduced as a complement, in order to mitigate some of the risks associated with regulating energy consumption, in addition to the potentially harmful environmental impacts of detergents discussed above. The EU GPP textile criteria document furthermore recommends that this criterion is weighted at 25% of the total points available (in this tender example 5 points out of 20 available for the environmental performance category), with the previous award criterion being allotted the remaining 75% (in this tender example 15 points out of 20).

Verification issues: A greater administrative effort may be required if the service provider operates various laundry sites.

Suggestion: The contracting authority should make sure that verification is provided at the level of the individual process lines at each site used for the textile service contained in the contract. As with the previous award criterion, this award criterion should be used in connection with a corresponding contract performance clause as indicated below, in order to ensure and monitor compliance.

Contract performance clause: (EU GPP Criterion CPC1. For textile services that include laundering/ Comprehensive criteria)

The successful tenderer must carry out the services according to the proposed specific energy consumption and compliant detergent use which it committed to in its tender.

Verification requirements:

- monthly metered energy consumption data aggregated from the sub-metered process lines at related sites, reflecting the fabric type/weight and divided by the weight of textiles processed;
- copies of invoices for detergent purchases together with proof that the detergent(s) either:
 - (i) has the EU Ecolabel; or
 - (ii) has a Type I ecolabel which contains equivalent criteria; or
 - (iii) meets the specified EU Ecolabel criteria (see [here](#)).

Proof must comprise valid Ecolabel licences for ecolabels and/or third-party-verified test data for the detergents used. The contracting authority reserves the right to request third-party verification at any point during the contract and the contractor will be obliged to provide this evidence at their own expense.

Note: The EU Ecolabel referred to here is the EU Ecolabel for Industrial and Institutional Laundry Detergent ([Commission Decision \(EU\) 2017/1219](#)).

General issues: This contract performance clause is designed to monitor and ensure compliance with the commitments made under the award criteria. Consequently, any detected non-compliance could be taken as justification for premature termination of the contract.

Verification issues: To ensure the effectiveness of this criterion, and the related award criteria, a certain commitment and effort will be required from the contracting authority throughout the duration of the contract, in order to track and assess compliance. This may be the case if the service provider presents test data for detergents, or refers to ecolabels other than the EU Ecolabel, which may require more time-consuming analysis.

Box 6. Case study 5: Framework agreement on washing and leasing clothing for health professionals in Odense Municipality (Denmark)

In a 6-year framework agreement for the provision of health sector clothing, including leasing, collection, washing and redistribution of clothes in the Odense Municipality, the technical specifications required, among other things, that throughout the service contract period the tenderer must be certified according to [ISO 14001](#) (Environmental management system) or equivalent, and that the laundry service must use a detergent that is labelled with or that meets the criteria of the [Nordic Swan](#), the [EU Ecolabel](#) or equivalent.

Important lessons:

- GPP criteria may be applied flexibly, for example as technical specifications or award criteria;
- the procurement procedure and requirements can lead to notable sustainability, service and quality improvements in similar procurement exercises, illustrating the potential of GPP to induce change;
- the (local) market seems not only ready to respond to stricter environmental requirements in the procurement of clothing services, but also willing to suggest further improvements, linking back to the potential benefits of market dialogue discussed earlier in this Guidance.



More detailed information about this case study can be found [here](#)

Source: European Commission (2019), GPP In practice Issue no. 87

7 How to use environmental labels and certifications in GPP

The design, assessment and verification of environmental requirements in textile product and service tenders can be complex and may require technical expertise and analysis. Recognised international, European and national environmental labels or certifications relating to textile products and services can be not only a useful reference for defining individual GPP criteria, they can also offer an easy, time-saving and effective means of third-party verification.

Some of the most textile-relevant ecolabels or certifications include:

- [EU Ecolabel for textile products](#)³
- [The Nordic Swan](#)
- [OEKO-TEX](#)
- [Global Organic Textiles Standard \(GOTS\)](#)
- [The Blue Angel](#)

7.1 Using environmental labels and certifications as GPP criteria

According to Article 43 of the EU public procurement directive ([Directive 2014/24/EU](#)), third-party environmental labels can be required in technical specifications, award criteria, or contract performance conditions as means of proof, provided that they fulfil all of the following conditions:

- the label requirements only concern criteria which are linked to the subject matter of the contract and are appropriate to define characteristics of the supplies or services that are the subject matter of the contract;
- the label requirements are based on objectively verifiable and non-discriminatory criteria;
- the labels are established in an open and transparent procedure in which all relevant stakeholders, including government bodies, consumers, social partners, manufacturers, distributors and non-governmental organisations, may participate;
- the labels are accessible to all interested parties;
- the label requirements are set by a third party over which the economic operator applying for the label cannot exercise a decisive influence.

So, for example, if a label includes criteria that cannot be linked to the subject matter (e.g. a servicing/maintenance requirement where the contract is for supply only) indicate which label requirements are referred to. Furthermore, contracting authorities requiring a specific label shall accept all labels that confirm that the supplies or services meet equivalent label requirements.

7.2 Using environmental labels and certifications as evidence of compliance

Error! Reference source not found. presents an overview of how some textile labels and certifications relate to the individual EU GPP textile criteria ([SWD \(2017\) 231 final](#)), indicating to what extent they may be used as evidence of compliance in the verification process. Please consider that the labels and certifications discussed may undergo regular updates that affect the validity of the information provided. Furthermore, the applicability of these and other alternative forms of verification or compliance evidence always needs to be checked in relation to the actual subject matter and criteria used in your tender. It should also be considered that not all EU GPP textile criteria are covered by or can be related to existing ecolabels or certifications (see **Error! Reference source not found.** below for reference). The EU GPP criteria for textile services are not covered directly by any of the examined textile labels, although they may apply indirectly if, for example, the service includes the renting of textile products. As in the case of detergents used in laundry services, other ecolabel product categories may be referred to where relevant. Information about textile products and product providers that carry a label or certification is generally provided on the prospective label websites, for example in the [EU Ecolabel Product Catalogue](#) or the [OEKO-TEX Buying Guide](#). Where environmental labels or certificates are not available or applicable, a full assessment and verification process is required. The [EU GPP criteria document](#) provides information about, for example, relevant standards or test methods that could be applied to ensure effectiveness.

³ EU Ecolabel Textiles products licences. Available at: <http://ec.europa.eu/ecat/category/en/14/textile-products>

Table 1. EU GPP textile criteria in relation to other textile labels or certifications

Textile label or certification		EU Ecolabel ⁴	Nordic Swan ⁵	Blue Angel ⁶	OEKO-TEX 100 ⁷	GOTS ⁸
EU GPP criterion						
TS1. Cotton fibres	Core	✓ ⁹	✓ ¹⁰	✓✓	✓ ¹¹	✓✓ ¹²
	Comprehensive	✓	✓	✓✓	✓	✓✓
AC1. Cotton fibres (Core & comprehensive)		✓	✓	✓	✓	✓ ¹³
TS2. Wool fibres (Core & comprehensive)		✓	✓✓	✓	✗	✓
TS3.1. Sulphur emissions to air (Core & comprehensive)		✓	✓ ¹⁴	✓	✗	✗
TS3.2. Halogenated emissions from pulp (Comprehensive)		✓	✓	✓	✗	✓
TS4. Polyester recycled content (Comprehensive)		✓	✗	✓	✗	✓✓
AC2. Polyester and polyamide (nylon) recycled content (Comprehensive)		✓	✗	✓	✗	✓
AC3. Polyester recycling (Comprehensive)		✗	✗	✗	✗	✗
TS5. Declaration for REACH Candidate List substances (Core & comprehensive)		✓✓	✓✓	✓	✓	✓✓
TS6. Substances to be tested for on the final product (Core & comprehensive)		✓	✓	✓	✓✓	✓✓
AC4. Restrictions on substances to be verified at production sites (Comprehensive)		✓✓	✓	✓	✗	✓
TS7. Durability standards (Core & comprehensive)		✓	✓ ¹⁵	✓ ¹⁵	✓ ¹⁵	✓ ¹⁵
TS8. Availability of parts and accessories (Core & comprehensive)		✗	✗	✗	✗	✗
TS9. Fabric selection to minimise energy use for drying and ironing (Core & comprehensive)		✗	✗	✗	✗	✗
TS10. Care labelling (Core & comprehensive)		✗	✗	✗	✗	✗
AC5. Design for reuse and recycling (Core & comprehensive)		✗	✗	✗	✗	✗

✗ = not covered/does not apply; ✓ = partially or potentially covered/further assessment required; ✓ = covered; ✓✓ = exceeded

⁴ Based on Commission Decision 2014/350/EU and amendment Commission Decision 2017/1392/EU.

⁵ Referring only to the [Textiles, hides/skins and leather](#) product group (Version 4.10).

⁶ Referring only to the [Textiles](#) product group (Version 1.2, July 2017).

⁷ Referring to Edition 03.2019.

⁸ Referring to Version 5.0.

⁹ The certified organic/IPM cotton content depends on the product and additional label specifications.

¹⁰ The Nordic Swan only guarantees a minimum of 10% organic cotton, unless additionally labelled as 'organic', in which case the organic fibre content would be at least 95%.

¹¹ The certificate may include additional descriptions ('Bio cotton' or 'organic cotton') indicating a 100% organic content.

¹² [GOTS](#) only approves organic, or organic 'in conversion' fibre content, but not IPM grown cotton.

¹³ The exact amount of organic fibre content in the certified product depends on the actual GOTS label (minimum of 70%).

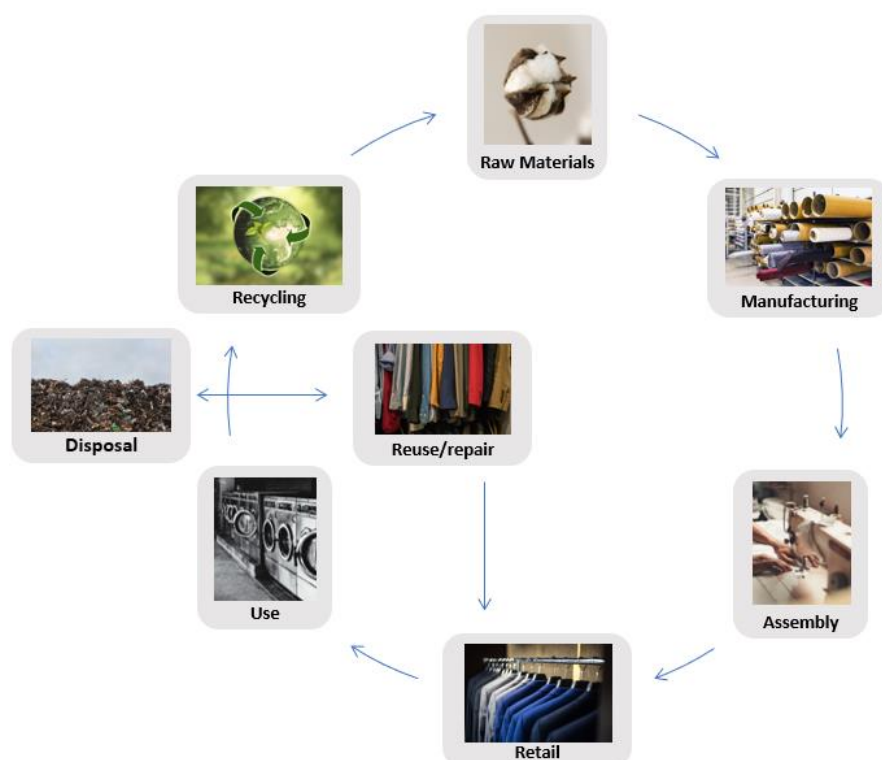
¹⁴ The Nordic Swan only refers to viscose and does not distinguish between washing methods of filament fibres, for which it sets a general limit of 120 g S/kg, which could be interpreted as equivalent.

¹⁵ To a varying extent these labels and certifications cover some but not all the EU GPP durability standards, as well as containing slight differences regarding specific requirements.

8 How Life Cycle Costing (LCC) can benefit your GPP process

The life cycle of textile products (see Figure 4) is complex and varies regarding the impacts and costs associated with each stage, depending on aspects such as the nature, origin, use and end of life of the final product.

Figure 4. Textile indicative life cycle



In the public procurement context, Life Cycle Costing (LCC) is an analytical tool that serves to look beyond the initial purchase price, to also consider other costs that are likely to be incurred throughout the life cycle of a textile product (see

Box 7. LCC calculation tools and guides that can be applied to textile products and services

4. General LCC tool guidance provided by the European Commission (available [here](#))
5. LCC tools from The National Agency for Public Procurement in Sweden (available [here](#) in English)
6. LCC/CO₂ calculation tool & accompanying User Guide from SMART SPP (available [here](#) in English and Spanish)

Note: The presented LCC tools and guides are not specifically designed for textile products or services and need to be evaluated and, where necessary, adapted according to the context and content of each procurement process.

), including operating costs (e.g. washing and maintenance) and end-of-life costs (e.g. disposal). Insights into the total cost of ownership (TCO) allows the contracting authority to make a more comprehensive assessment of the most economically

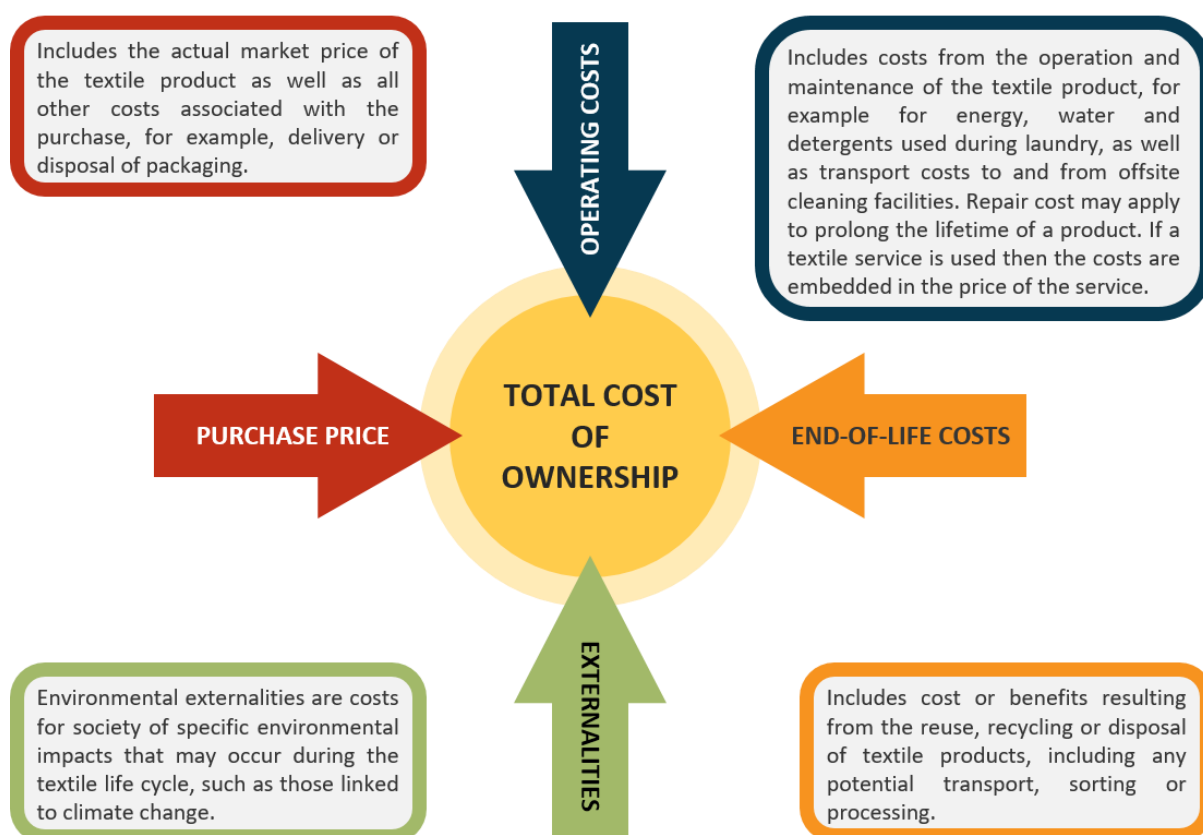
advantageous tender (MEAT), and, consequently, better informed investment decisions that may save long-term costs, while potentially also reducing environmental impacts.

Box 7. LCC calculation tools and guides that can be applied to textile products and services


1. General LCC tool guidance provided by the European Commission (available [here](#))
2. LCC tools from The National Agency for Public Procurement in Sweden (available [here](#) in English)
3. LCC/CO₂ calculation tool & accompanying User Guide from SMART SPP (available [here](#) in English and Spanish)

Note: The presented LCC tools and guides are not specifically designed for textile products or services and need to be evaluated and, where necessary, adapted according to the context and content of each procurement process.

Figure 5. The total cost of ownership



Although the outputs of a LCC analysis do not provide information about environmental impacts, or have a direct connection to impact reduction, the information obtained from the application of LCC to textile procurement may nonetheless allow the contracting authority to make more effective use of the EU GPP textile criteria, in order to regulate some of the associated costs. Section 4 of the [EU GPP textile criteria document](#) provides an indication of which aspects of the design and specification of textile products may serve to reduce life-cycle costs, including those indirectly incurred by contracting textile-related services.

 Generally, it is not easy to quantify and attribute a monetary value to environmental externalities. If you wish to assign a cost to environmental externalities as part of your award criteria, procurement documents need to clearly define the calculation methods and data requirements. Furthermore, the [2014 EU procurement directive \(Directive 2014/24/EU\)](#) requires that:

- the method used is based on objectively verifiable and non-discriminatory criteria;
- the method used is accessible to all interested parties; and
- the data required can be provided with reasonable effort by normally diligent economic operators.

 More information and links to additional resources in this regard can be found on the [EC webpage](#), for example to the [Buying Green! Handbook](#) or the SPP REGIONS [LCC State of the Art Report](#)

Box 8. [Case study 6: LCC applied in the procurement of hospital uniforms in a Polish county hospital](#)

An innovative procurement process for hospital uniforms in Poland included the application of LCC as an evaluation tool in relation to the hospital's environmental objectives. This involved competitive dialogue with potential suppliers, as well as testing of samples in order to acquire the necessary information. The total cost of ownership represented a central award criterion, and the valuable insights resulting from the LCC analysis led to a successful multi-year contract with the company offering the product with the lowest life-cycle cost. In the winning offer, hospital clothing was made of a mixture of synthetic and cellulose fibres that showed greater durability, longer lifetime, and reduced drying requirements than other alternatives, leading to **overall cost savings of about 20% compared with the competing offer with the lowest initial purchase price**. The following formula was applied:

$$LCC = \frac{P_p + C_e + C_u}{T} \times T_{MAX}$$

LCC	– whole-life-cycle cost,
P _p	– purchase price of an entire set of clothes declared by the supplier,
C _e	– exploitation costs,
C _u	– utilisation costs,
T	– amount of time the clothing can be used,
T _{MAX}	– the longest amount of time the clothing can be used offered by the suppliers participating in the procurement.

Important lessons:

- the product with the lowest purchase price may turn out to have the highest life-cycle cost;
- laundering and drying turned out to be the largest life-cycle cost component (here 80%);
- factor in sufficient time for sounding out the market and dialogue (here 1 year was judged optimal);
- resource and time requirements may limit the practicality of LCC to large or difficult purchases;
- suppliers may not always be ready or willing to engage with the LCC approach to procurement.

 More detailed information, and contact details regarding this case study, can be found [here](#)

Source LCB-HEALTHCARE, Case study

9 References

European Commission GPP website and Helpdesk (https://ec.europa.eu/environment/gpp/index_en.htm)

EU GPP Criteria for Textile Products and Services (published in 2017)
(https://ec.europa.eu/environment/gpp/eu_gpp_criteria_en.htm)

European Commission *Technical Background Report* for the EU GPP Textile Criteria (published in 2017)
(https://ec.europa.eu/environment/gpp/pdf/criteria/textiles_gpp_technical_report.pdf)

European Commission Buying Green! Handbook (3rd edition published in 2016)
(https://ec.europa.eu/environment/gpp/buying_handbook_en.htm)

European Commission GPP Good Practice webpage (https://ec.europa.eu/environment/gpp/case_group_en.htm)

European Commission Public Procurement – Public Procurement Guidance for Practitioners (2018)
(https://ec.europa.eu/regional_policy/en/information/publications/guidelines/2018/public-procurement-guidance-for-practitioners-2018)

PROCURA+ Manual for implementing sustainable procurement (<http://www.procuraplus.org/>)

PROCURA+ Case Studies of sustainable and innovative procurement approaches (<http://www.procuraplus.org/case-studies/>)

Sustainable Procurement Platform (<http://www.sustainable-procurement.org/>)

Sustainable Procurement Platform. A case study section on sustainable and circular procurement
(<http://www.sustainable-procurement.org/case-studies/>)

Sustainable Procurement Platform. The Resource Centre regarding e.g. criteria, tools/guidance, projects and reports
(<http://www.sustainable-procurement.org/resource-centre/>)

Procurement Forum website including a communication platform and a resource centre
(<https://procurement-forum.eu/>)

Tex-EASTile – Manual for the introduction and the diffusion of GPP with a focus on the textile sector
(https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=2ahUKEwjI75WrrOHjAhXBZ1AKHW6YDZkQFjAAeqQIABAC&url=http%3A%2F%2Fwww.southeast-europe.net%2Fdocument.cmt%3Fid%3D200&usq=AOvVaw3oYhxqi_8-cNodqIXZeJ-r)

GPP NET – GPP Handbook
(http://ec.europa.eu/environment/life/project/Projects/index.cfm?fuseaction=home.showFile&rep=file&fil=GPP_General.pdf)

SPP Regions – Life Cycle Costing State of the Art Report
(http://www.sppregions.eu/fileadmin/user_upload/Life_Cycle_Costing_SoA_Report.pdf)

List of abbreviations and definitions

AC	Award criteria
BCI	Better Cotton Initiative
CPC	Contract performance clauses
EC	European Commission
ECHA	European Chemicals Agency
EEA	European Environmental Agency
EU	European Union
FAO	Food and Agricultural Organisation
GOTS	Global organic textiles standard
GPP	Green Public Procurement
IPM	Integrated Pest Management
ISO	International Organisation for Standardisation
LCC	Life Cycle Costing
NAP	National Action Plan
NOP	National Organic Programme
MEAT	Most economically advantageous tender
MS	Member States
SC	Selection criteria
SDGs	Sustainable Development Goals
SVHC	Substances of very high concern
TCO	Total cost of ownership
TS	Technical specifications

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Annexes

Annex 1: Sample REACH declaration for SVHC

COMPANY

Address

Postal Code, City (Country)

Telephone

e-mail

City, 05 December 2019

Revision 1

Declaration regarding Substances of Very High Concern (SVHC)

Substances of Very High Concern are published in a list¹⁶, which is available on the website of the European Chemicals Agency (ECHA). This list is in accordance with Article 57 and Article 59 of Regulation (EC) No. 1907/2006 (REACH Regulation) and is updated by the European Chemicals Agency every 6 months.

This list was last updated on 16 July 2019.

According to Article 31 and Article 33 of Regulation (EC) No. 1907/2006 (REACH Regulation), suppliers shall inform their customers sufficiently about substances fulfilling the criteria of Article 57 and Article 59 in order to allow safe use of the material.

We hereby certify that the product(s) or article(s) manufactured by COMPANY described below and based on the information provided by our suppliers do not contain any of the substances listed on the Candidate List of Substances of Very High Concern (SVHC) in a concentration above 0.1% weight by weight (w/w) in accordance with Article 33 of the REACH Regulation, as updated on 16 July 2019.

- PRODUCT / ARTICLE 1.
- PRODUCT / ARTICLE 2.
- PRODUCT / ARTICLE 3.

The present statement is valid for a period of 6 months starting from the date of the last update of the Candidate List of SVHC.

Issued by an electronic system.

COMPANY

Regulatory Affairs Department

¹⁶ <http://echa.europa.eu/candidate-list-table>

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