

TRSA: Expand, Protect and Promote

Kevin Schwalb, TRSA

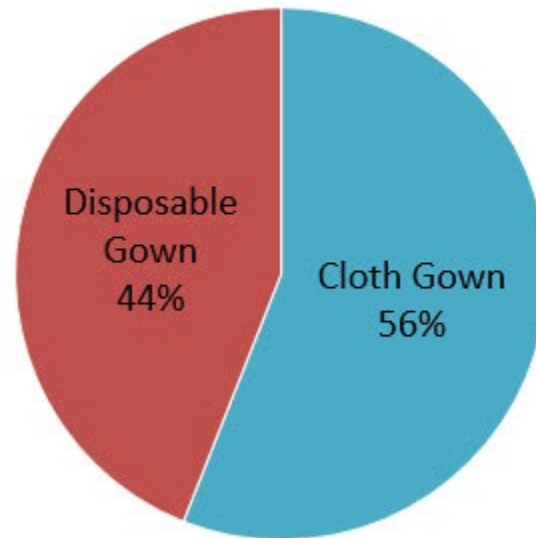
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Healthcare Reusables vs. Disposables

TRSA 2022 Consumer & Customer Research

Consumers/Patients 2015: Gown Preference



	Consumers	Most Frequent Medical Treatment								
		General Doctor	Specialist	Hospital	Urgent Care	Med Lab	Retainer Doctor	Surgery Center	Nursing Home	Ambulatory Care
	<i>n700</i>	<i>n419</i>	<i>n140</i>	<i>n52</i>	<i>n41</i>	<i>n18</i>	<i>n11</i>	<i>n9</i>	<i>n7</i>	<i>n2</i>
Cloth Gown	56%	58%	57%	50%	47%	49%	82%	35%	57%	0%
Disposable	44%	42%	43%	50%	53%	51%	18%	65%	43%	100%

Consumers/ Patients: 2022

Consumers' preferences are split

% prefer disposables v. cloth in a medical setting	TOTAL
PREFER CLOTH TOTAL	48%
Strongly Prefer Cloth	16%
Somewhat Prefer Cloth	32%
Somewhat Prefer Disposables	33%
Strongly Prefer Disposables	19%
PREFER DISPOSABLES TOTAL	52%

Association with "clean" & "safe" → Preference

To tip the scales toward reusables, position them as clean & safe.

Demographic groups that prefer CLOTH:

- > 55+ year-olds (57%)
- > Men (55%)
- > More eco-conscious (55%)

Demographic groups that prefer DISPOSABLES:

- > 18-24-year-olds (59%)
- > More cost-conscious (59%)
- > Less eco-conscious (58%)
- > Women (57%)

Consumers/ Patients 2022

When presented with the idea that disposables may not be completely sanitary, it became clear **consumers' minds can be swayed on the matter.**

<i>It is possible that disposables are <u>not</u> sanitary</i>	TOTAL
AGREE TOTAL	72%
Strongly Agree	14%
Somewhat Agree	58%
Somewhat Disagree	23%
Strongly Disagree	5%
DISAGREE TOTAL	28%



Cloth's big opportunity: Hygienically Clean certification

Impact of a HC certification label on cloth patient gowns:

- > **62% More likely to prefer a cloth gown**
- > No impact on preference (29%)
- > Less likely to prefer a cloth gown (8%)



ADVOCACY

Range of Issues TRSA has been Active

- Essential Services Designation – State/Federal
- Vaccine Prioritization
- Reusable Table Linens – Restaurant Re-Opening – State/Federal
- Shop Towel Rule
- Shop Towel Lawsuit from Non-Wovens (Kimberly Clark)
- Boiler Rule
- VOC Emission
 - ✓ Region I Negotiations Significantly Reducing Fines
 - ✓ Establish Amnesty then Right to Cure in Region 5
- CA Fitted Sheet
- CA Title 22 Revision
- CA – Reusable Healthcare Operating Threshold
- CA Microplastics – Ongoing
- MO Tax Rebate for Laundry Supplies
- IN Payroll Deduction for Uniforms
- IN Tax Reduction
- NY Licensing Fees
- TX Tax Reduction

Advocacy – Awareness, Education and Outreach

Legislative Contacts

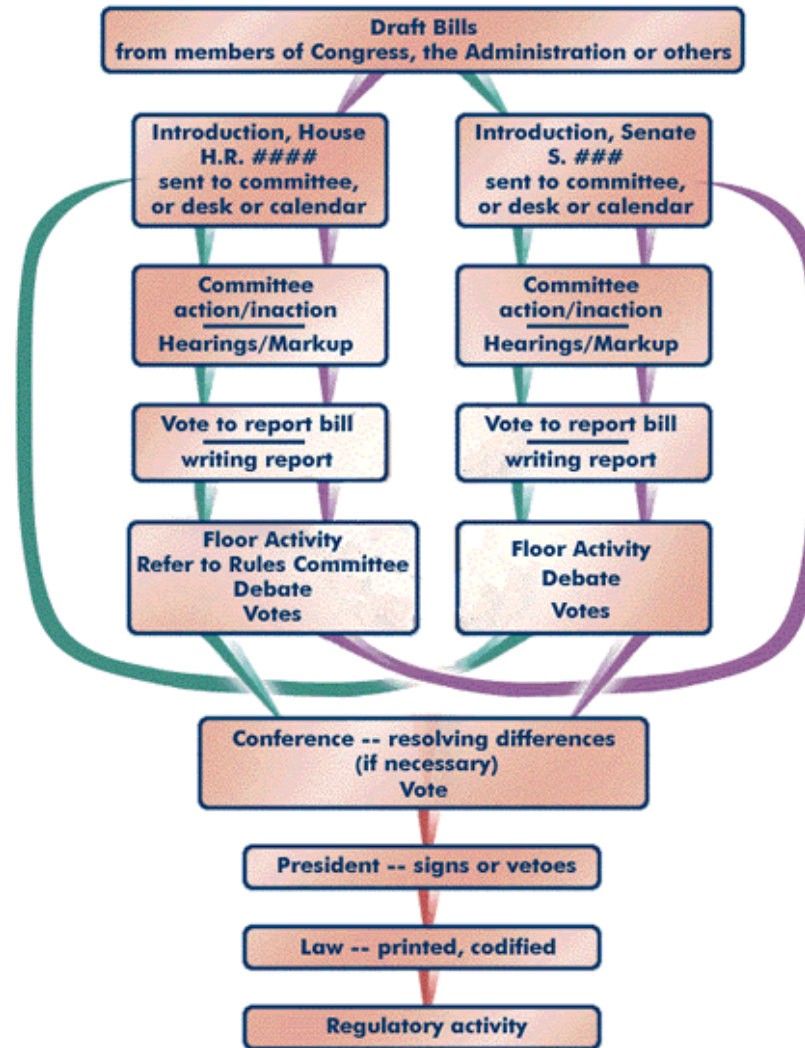
- Congressional Visits/Meetings
- Congressional Plant Tours
- State Legislative Days
- Over 2,500 Letters to Congress

Lobbyists – Federal, CA, NY, KY, WI & Canada

- Other states when needed (OH, IL, TX)



Legislative Process



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Federal Legislative Issues

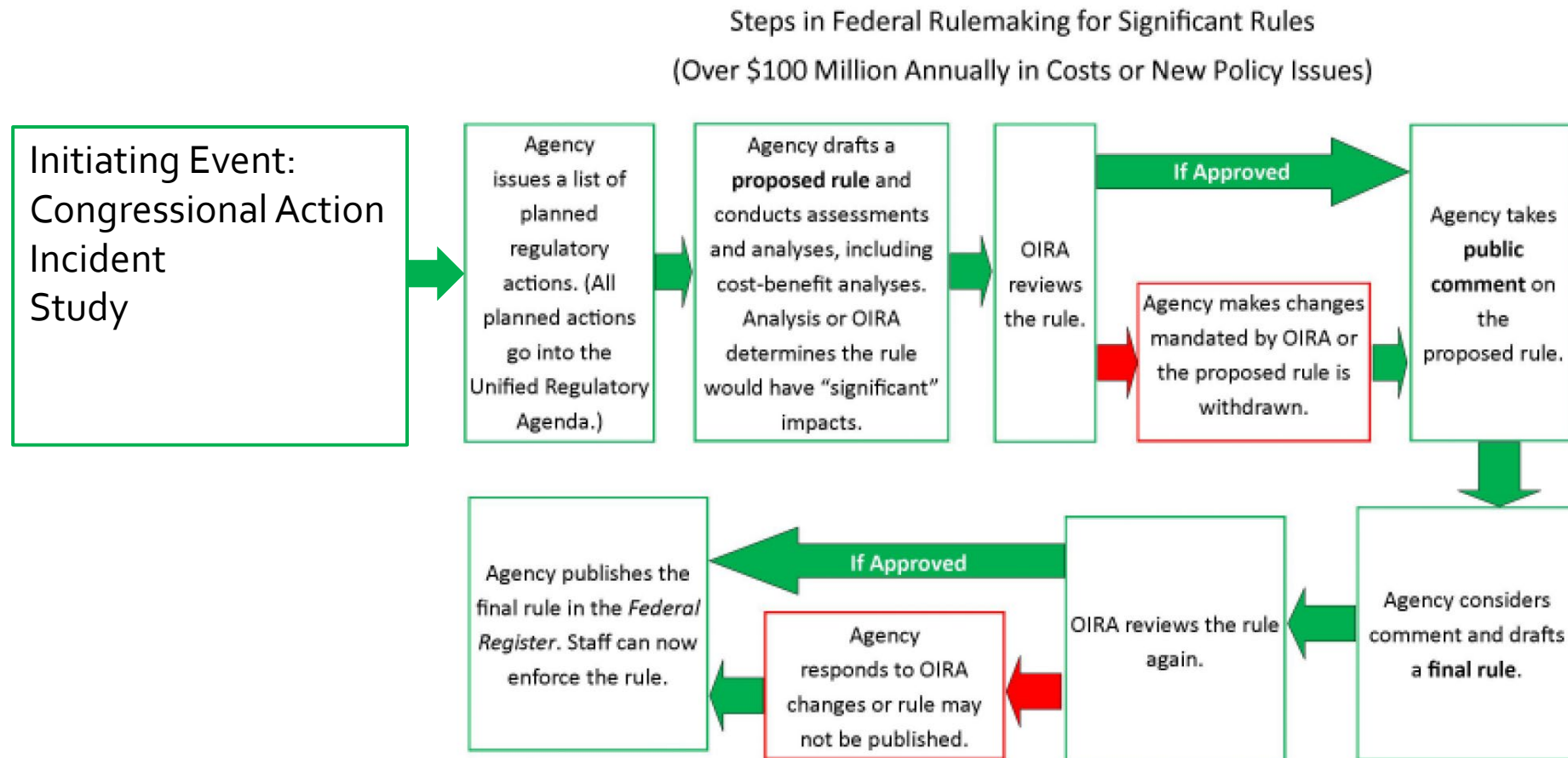
Minimum Threshold of Reusable Healthcare
Textiles

Letter to HHS Sec. Becerra

Industrial Laundering of Healthcare
Uniforms/Scrubs

Figure 1. Federal Rulemaking Process

Source: Center for Effective Government



Note: OIRA does not review rules submitted by independent regulatory agencies (e.g., the Consumer Product Safety Commission or the Consumer Financial Protection Bureau).

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CDC Response

National Academy of Sciences Workshop
Release Transcript of Workshop

National Institute of Occupational Safety and Health
Study projected August 2024
Information from NAS to develop regulation

Reusable Healthcare Textiles - Canada

A government- funded study released in 2023 found significant environmental benefits from boosting the amount of reusable PPE. A result which was applauded by federal Environment Minister Steven Guilbeault.

Regulatory Issues

OSHA Heat Injury and Illness ANPRM

NIOSH to make final recommendation to OSHA

PFAS (Federal)

Hazardous Substance

Drinking Water Limits

National Labor Relations Board Definition of Joint Employer

DOL Wage and Hour Overtime Rule

Reclassification of Industry

Particulate Matter 2.5 – Air Quality Standard Reduction

Joint Employer Definition

Either possessing the authority to control one or more essential terms and conditions of employment (regardless of whether it is exercised) OR exercising this authority directly or indirectly to establish an entity's status as a joint employer.

Congressional Review Act Resolution Passed
Federal Judge invalidated new regulation.

“White Collar Threshold”

DOL pushing changes to Overtime Pay Regulations:

Raises the minimum salary threshold under which workers must be paid overtime for all hours worked over 40 in a given workweek. DOL expects to increase the threshold to \$60,209 in 2024, from the current \$35,568.

Automatically updates the threshold every three years based on the 35th percentile of earnings in the lowest wage census region.

Published in Federal Register 4/16

Goes into effect 60 days after final rule.

Court challenges scheduled.

Temporary Foreign Worker Cap

In March Immigration Minister Marc Miller announced the federal government will be implementing a cap on the number of temporary foreign workers (TFWs) permits it issues with the goal of reducing the number of TFWs from 6.2% of Canada's population to 5% in 2025.

The government has not yet determined how it will determine who is issued a permit under the capped program. It intends to consult with stakeholders and provinces over the next several months and announce the details of the implementation in the Fall of 2024 including how it will distribute the significantly reduced number of TFW permits it will issue.

PFAS Standards

For PFOA and PFOS, EPA is setting a Maximum Contaminant Level Goal, a non-enforceable health-based goal, at zero. This reflects the latest science showing that there is no level of exposure to these contaminants without risk of health impacts, including certain cancers.

EPA is setting enforceable Maximum Contaminant Levels at 4.0 parts per trillion for PFOA and PFOS, individually. This standard will reduce exposure from these PFAS in our drinking water to the lowest levels that are feasible for effective implementation.

For PFNA, PFHxS, and “GenX Chemicals,” EPA is setting the MCLGs and MCLs at 10 parts per trillion.

Because PFAS can often be found together in mixtures, and research shows these mixtures may have combined health impacts, EPA is also setting a limit for any mixture of two or more of the following PFAS: PFNA, PFHxS, PFBS, and “GenX Chemicals.”

Wastewater Treatment for PFAS Removal

There are many scientists and engineers developing technologies to remove PFAS from water.

Removing PFAS from drinking water is easy. No interferences with ions or other pollutants that need to be removed prior to treatment.

Removing PFAS from wastewater is very challenging. All of the interfering pollutants and ions require removal before PFAS is removed. Treatment will require multi-step processes including ultrafiltration, reverse osmosis, ion exchange, activated carbon, and advanced oxidation.

The water will be so exceptionally clean and costly that you can't afford to flush it to the sewer.

Wastewater Treatment for PFAS Removal

The wastewater treatment technology will remove the PFAS for the wash water.

The big question is how is the PFAS disposed once it is removed from the water.

Landfills can't take it. They have enough of their own PFAS in leachate that needs to be treated.

Most PFAS will break down completely at incineration temperatures around 1,500 degrees Celsius (2,730 degrees Fahrenheit), but it's energy intensive and suitable incinerators are scarce.

New EPA Drinking Water Health Advisory Levels

- Comparison to State Standards:

	PFOS	PFOA
EPA HALs	0.020 ppt	0.004 ppt
California PHG	1 ppt	0.007 ppt
Michigan MCL	16 ppt	8 ppt
Michigan WQS	11 ppt	420 ppt
Wisconsin MCL (proposed)	20 ppt	20 ppt
Wisconsin WQS (proposed)	8 ppt	22 ppt
New York MCL	10 ppt	10 ppt
New Hampshire MCL	15 ppt	12 ppt

PFAS

Wastewater PFAS Limits are Coming
Michigan First: PFOS WQS of 12 ppt

PFOS and PFOA are the Primary Concern
EPA issued proposed rule listing as Hazardous Substances

ppt State Water Quality Standards Will Result in ppt Limits for
Industries

Laundries Are a Top 5 Industrial Wastewater Source of PFAS

Current Activity

- Current States with the Most Stringent PFAS Standards:
 - CA, MI, NY, NH, NJ, MN, MA, VT, OH, CT
- Current Regulated PFAS Compounds:
 - PFOS, PFOA, PFHxS, PFNA, PFHpA, PFDA, GenX, PFBS, PFBA, PFHxA

PFAS Not Only Wastewater

States are taking legislative action to eliminate PFAS in carpets, rugs, apparel, textile furnishings, upholstered furniture, fabric treatments and/or other textiles, including:

California

Colorado

Maine

Maryland

Minnesota

New York

Vermont

Washington

PFAS Legislation AB 1817

AB 1817 prohibits the distribution, sale, or offer for sale, of any food packaging that contains regulated PFAS substances and also requires the manufacturer to use the least toxic alternative when replacing the PFAS in the product.

Beginning on January 1, 2025 the new AB 1817 extends those same prohibitions to textile articles containing PFAS.

TRSA Actions

Position Industry as a Leading Edge

EDUCATE, EDUCATE, EDUCATE

Webinars

Articles

Tool Box – Clearing House of Information

<https://www.trsa.org/resources/pfas-planning-toolkit/>

Engage with Policy Makers

Financial Incentives for Research and Development/Instalation

PFAS Activity - Canada

May 2023:

Federal government published the Draft State of Per- and Polyfluoroalkyl Substances (PFAS) Report. This report is the first step towards introducing regulations on the production and use of PFAS under Canada's Chemicals Management Plan.

The government also published a proposed Risk management scope for PFAS proposing add chemicals in a PFAS class to the List of Toxic Substances under the Canadian Environmental Protection Act (CEPA). This would give the federal government broad powers to regulate and limit the use of PFAS as a class of chemicals.

PFAS Activity – Canada; Cont.

The next step will be to publish a final version of the report. If accepted by the Environment Minister, he can then order the listing of PFAS as a new class on the List of Toxic Substances. This would be followed by draft regulations that would lay out how the government will deal with PFAS.

Health Canada has proposed setting an objective for the acceptable levels of PFAS in drinking water in a draft proposal published last year. It proposes an objective of 30 ng/L for PFAS substances in water. A media report in April 2024 says the government intends to publish the final version of the objective this year.

TRSA Response

Filed Comments to Health Canada

- Consider all PFAS are not the same
- Follow the best science and risk
- Develop a clear definition
- Evaluate the technical limitations
- Develop a cost-benefit analysis

New York

Healthcare Worker and Environment Protection Act

50% Threshold of Reusable Textiles in Healthcare
Facilities

Congestion Pricing

Reclassification as Manufacturer

Wisconsin

Legislation to recognize Linen, Uniform and Facility Services Industry as Manufacturer under the Manufacturing and Agriculture Tax Credit.

Reusable Operating Threshold of Healthcare Textiles - WDHHS



California

Extended Producer Responsibility

Textile Passport – European Union

Operating Threshold of Reusable Healthcare
Textiles

Advanced Clean Fleet

Extended Producer Responsibility

California State Senator Josh Newman (D-CA-29) has introduced the Responsible Textile Recovery Act of 2023.

Requires apparel and home textile manufacturers in California to develop and pay for a system to collect and recycle textile products.

The proposed law would require manufacturers to achieve specific recycling goals based on the amount of textiles they produce.

The legislation, as currently written, identifies the linen, uniform and facility services industry as a producer which would require operators to achieve the same reduction goals.

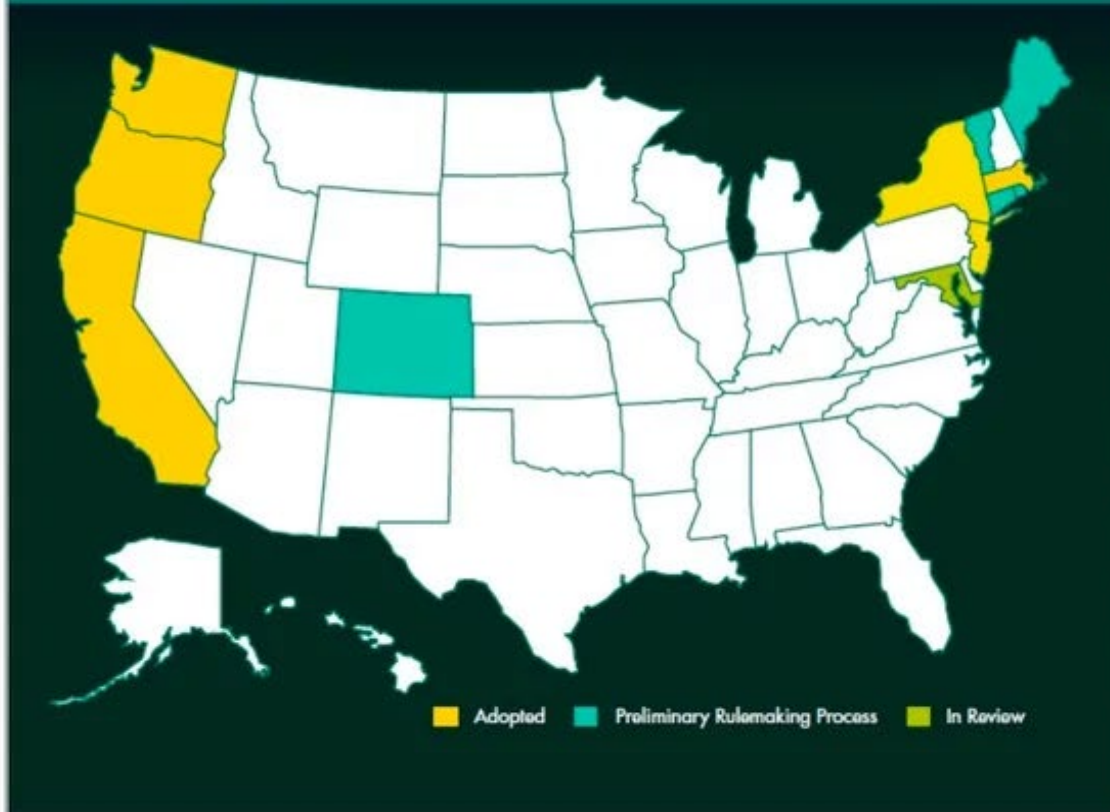
TRSA defeated bill in Committee

Zero-Emission Fleet Percentage	10%	25%	50%	75%	100%
Box trucks, vans, two-axle buses, yard trucks	2025	2028	2031	2033	2035
Work trucks, day cab tractors, three-axle buses	2027	2030	2033	2036	2039
Sleeper cab tractors and specialty vehicles	2030	2033	2036	2039	2042

ZEV Milestone Phase-In

Advanced Clean Trucks Rule Progress

Current Status of ACT Rulemaking Across the U.S.



State	Status	Beginning MY	Fleet Reporting Date
California	Adopted	2024	April 1, 2021
Oregon	Adopted	2025	June 30, 2022
Washington	Adopted	2025	Not required
New Jersey	Adopted	2025	April 1, 2023
New York	Adopted	2025	April 1, 2023
Massachusetts	Adopted	2025	Not required
Connecticut	Preliminary Rulemaking Process	-	-
Rhode Island	Preliminary Rulemaking Process	-	-
Colorado	Preliminary Rulemaking Process	-	-
Maine	Preliminary Rulemaking Process	2026	Not required
Vermont	Preliminary Rulemaking Process	-	-
Maryland	In Review	-	-
DC	In Review	-	-

Current ACT rulemaking status as of April 2022

Zero Emission Vehicles - Canada

The Canadian government has committed to a goal of 100% of sales of zero emissions new cars and light trucks by 2035 with interim targets along the way that will require vehicle manufacturers to meet targets for zero-emission vehicle sales or buy credits for each non-zero-emission vehicle sold above their limit. The push to have Canadians shift to zero-emission vehicles has been backed by several provinces which have introduced incentives for EV purchases which are on top of the incentive provided by the federal government. Incentives by Provinces:

<https://www.plugndrive.ca/electric-vehicle-incentives/>

The Canadian government has additionally committed to a target that 100% of new medium and heavy-duty trucks be emissions-free by 2040 where feasible. To support this goal the government has introduced the Incentives for Medium- and Heavy-Duty Zero-Emission Vehicles Program which offers a purchase incentive worth up to 50% of the cost of the qualified vehicles.

Canadian Zero Emission Requirements

- December 2022 proposal, the government sets out ZEV sales targets for automakers starting in 2026 and increasing over time.
 - Starting from the 2026 model year, automakers must ensure that 20% of new passenger vehicles available for sale in Canada are zero-emission
 - Increasing to 60% by 2030
 - Increasing to 100% by 2035

Kentucky

Effective July 1, 2018, the General Assembly imposed KY sales tax on “industrial laundry services” and “linen supply services”, which created new taxable categories to include the rental of uniforms, linens, and other similar property.

The KY Department of Revenue (“DOR”) recently has taken the position that the industry must BOTH (a) pay KY use tax on purchases of uniforms and linens and (b) charge KY sales tax again on charges for supplying those items to customers. The DOR has assessed additional tax and interest with respect to the industry’s purchases beginning July 1, 2018.

The DOR’s position effectively imposes Kentucky sales tax twice on uniforms and linens (double taxation) and imposes sales tax on sales tax (tax pyramiding).

Working to get legislation to eliminate the double tax - 2024.

More to Come

Ohio – Reusable Threshold of Healthcare Textiles

Illinois – Microplastic Filters on Washing Machines

Texas (2025) - Reclassify to Recognize Lower Tax Rate

Thank You

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