

New York State Green Procurement Program
Response to Comments on
Proposed Specification on Apparel and Textile Materials

Background: The proposed new specification for “Apparel and Textile Materials” was first considered by the Interagency Committee in November 2020 and tentatively approved for public comment. Based on comments received during 2020/2021, the specification was not revised.

Commenting Entities: Center for Biocide Chemistries

Issues raised by the Center for Biocide Chemistries During the Comment Period:

Requirement that Affected Entities not purchase apparel or textile materials that include anti-microbial or anti-odor agents be removed

Comments: CBC requests that the requirement that apparel and raw textile materials purchased for use by state agencies and public authorities “not contain added anti-microbial or anti-odor agents” be removed.

Response: The CBC indicates in their comments that they believe that apparel and textile materials that include anti-microbial and anti-odor agents can be a more sustainable option, but do not offer any validation of these claims. In addition, any potential sustainability benefits from including these agents could be offset by the environmental and health impacts of the manufacturing of these agents for inclusion in the apparel and textile material. This claim also does not account for the impact that these agents can have to health and the environment if they leach out of the apparel and textile material through washing and contact with the wearer.

In addition, the CBC indicates that all anti-microbial and anti-odor agents added to apparel meet the requirements for use under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), but they do not indicate in their comments that these added agents are necessary for the function of apparel and textile materials purchased by the State. The focus of the green procurement program is to promote pollution prevention by going beyond regulatory requirements and reducing the environmental and health impacts of potentially hazardous substances by eliminating them from procurement wherever possible.

Recommendation: To keep the requirement that agencies not procure apparel that includes anti-microbial or anti-odor agents.