



Stockholm 10 June 2010

## OPPORTUNITY TO COMMENT ON THE PROCUREMENT CRITERIA FROM THE SWEDISH ENVIRONMENTAL MANAGEMENT COUNCIL FOR PHARMACEUTICAL PRODUCTS

The Swedish Environmental Management Council is owned by the state, Sweden's municipalities and county councils, and the Confederation of Swedish Enterprise. The Swedish Environmental Management Council (MSR) is commissioned by the government and its owners to develop procurement criteria for public procurement. An important step in our quality assurance of procurement criteria is the cooperation with users and experts where we collect comments and suggestions on a specific field. For this to work quickly and easily, and to avoid time-consuming processing, we see no need for this cooperation to be handled as a referral where the response must be supported politically. Our aim is to learn from comments and suggestions about the design of the criteria, the practical application, environmental relevance, etc. All of which aims at increasing the quality of our procurement criteria. For more information on MSR, see [www.msr.se](http://www.msr.se).

### LEAVE YOUR COMMENTS

Here you have the opportunity to leave comments on the attached criteria documents with procurement criteria. The criteria document is intended to be published on the MSR website to be used in public procurement, but also in other professional procurement/purchasing.

We are grateful to receive constructive comments and suggestions on the design of the criteria, the practical application, environmental relevance, etc.

### BACKGROUND TO THE CRITERIA

The criteria document has been developed in a working group composed of representatives from trade and industry, purchasers, government agencies and the Swedish Environmental Management Council.

The criteria document covers pharmaceutical products and their packaging.

### HOW DO I REPLY?

To facilitate the collection of comments and to save time for you as contributor, it is important that you understand the scope and definition of MSR's procurement criteria, see Appendix 1. We are grateful for replies in electronic form to facilitate our work, so we ask that you to reply using the change function in Word directly in the document, or attach the reply form.



## HOW ARE MY COMMENTS TREATED?

The Swedish Environmental Management Council and the working group that participated in the development of the criteria will be discussing the comments submitted, and then consider what environmental criteria are deemed relevant and viable for the product group. Then MSR's process review group, with representatives from MSR's owners, will review whether the criteria process provided the opportunity for all stakeholders to submit comments, before the criteria are taken up for a formal decision by the CEO and then published on the MSR website. Publication is expected in late September 2010.

Send your comments to: Peter Nohrstedt at the latest by 2010-08-23.

If you have any questions, please contact Peter Nohrstedt by phone on +46 (0)8-700 66 93 or by e-mail: [peter@msr.se](mailto:peter@msr.se).

Best regards and thanks in advance,

Peter Nohrstedt

## APPENDICES

1. Appendix 1 Scope and definition of MSR's criteria work
2. Criteria document for pharmaceutical products
3. Authorities - mailing list



## APPENDIX 1 SCOPE AND DEFINITION OF MSR'S CRITERIA WORK

MSR's work shall rest on a scientific basis and be rooted in a broad stakeholder base. Procurement criteria shall be assessed based on practical procurement technicalities and legal applicability in a quality assured process. In addition, the administrative burden shall be taken into account, that is, how companies are affected and whether procurement criteria may make it difficult for companies, especially small ones (<50 employees), to participate in procurements. The work will start out from existing knowledge in the field from a lifecycle perspective as well as market information on the environmental performance of products, services and contracts. The procurement criteria shall be more stringent than is required in the legislation in force for the particular product group in question and result in more sustainable products/services/contracts being procured compared to if such requirements were not included in the procurement.

Amongst other things this means that the starting points for the requirements are that they should be:

1. relevant and logical for the product group and have a factual basis,
2. proportional (necessary, but not necessarily far-reaching for achieving their objective, i.e. "balancing the means against the ends"),
3. non-discriminatory,
4. measurable (possible to compare and evaluate),
5. connected to the item for procurement (not just visible connections,<sup>1</sup> chap. 3.4.2),
6. possible to check and follow up with a reasonable work effort,
7. verifiable, in terms of fulfilling requirements and criteria, within the time frame for the procurement (as a rule between 20 – 52 days),
8. clearly formulated and predictable so that all conceivable tenderers, national and international, are given the same opportunity to reply,
9. urging and stimulating ecologically sustainable product development.

However, it is important to have a certain flexibility within MSR to provide a wider acceptance of the environmental requirements. In cases where the environmental impact has or may have a direct negative effect on other important aspects such as safety, durability and functionality, MSR should also develop requirements covering these, for example, that a passenger car has a combination of low fuel consumption and high road safety. However, it is important that the added aspect itself is relatively well established and that there are methods for measurement, documentation and follow-up. MSR's work does not cover the underlying process of selecting which specific product/products should be procured. This choice is left to the procuring organisation which has the best knowledge of its own needs and circumstances.

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<sup>1</sup> See [ec.europa.eu/environment/gpp/pdf/handbook\\_sv.pdf](https://ec.europa.eu/environment/gpp/pdf/handbook_sv.pdf)



See also the policy of the Swedish Environmental Management Council's procurement activities at:

[www.msr.se/sv/Upphandling/Kriterier/Kriterieutveckling/Policy](http://www.msr.se/sv/Upphandling/Kriterier/Kriterieutveckling/Policy)