# Sustainability Criteria in Dutch Preference policy

Informational summary document on Sustainability Criteria in Dutch Preference policy for communicational products use

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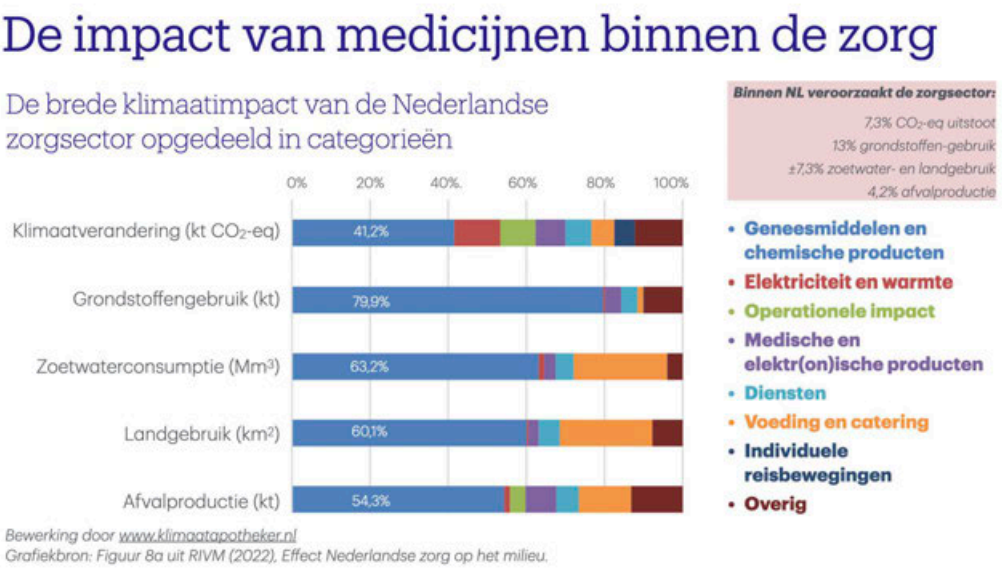
## *Selecting more sustainably produced medicines*

**Dutch health insurers want to select more sustainably produced medicines for their policy holders. That is why, in the context of Zorgverzekeraars Nederland, they will take environmental sustainability into account in the selection of generic medicines for extramural use: their preference policy.**

This document describes which sustainability criteria have been drawn up for this purpose, how they are requested and answered, and how this is included in the preference policy.

**Reason:**

The healthcare sector has great social significance, but at the same time it is responsible for a significant part of the national environmental impact of The Netherlands[i]. The production, distribution and use of medicines contribute significantly to greenhouse gas emissions, raw material consumption and environmental pollution by drug residues in water and soil. To make healthcare future-proof, it is necessary that sustainability is structurally included in all stages of the medicine chain – from development to use and disposal.




In the Green Deal Sustainable Care 3.0 (2023–2026),[ii] all health insurers have committed themselves to promoting a sustainable pharmaceutical chain, which includes environmentally friendly production processes, responsible use of medicines and the reduction of waste. Health insurers can play a key role by integrating sustainability into their selection and procurement policy for medicines. That is

why health insurers, [collaborating under the national asssociation Zorgverzekeraars Nederland(ZN)] have written in the Dutch Green Deal for Sustainable Healthcare (GDDZ) 3.0 article 6.2.g: "Health insurers, in consultation with all chain partners and in line with European agreements, make sustainability and/or environmental impact as much as possible part of the further development and implementation of the preference policy and provide stimulating incentives." This agreement was therefore included in the GDDZ3.0 Sectoral Implementation Plan of Zorgverzekeraars Nederland.

**Development of the criteria:**

In order to be able to select more sustainable medicines, information will be requested about a number of environmentally impactful[iii] criteria during the production, use and disposal of medicines. The choice of these aspects is based on topics that have a high materiality in the sector such as climate impact, water use and pollution. It is recognized that the greatest environmental impact of medicines comes from the production phase and comparatively to a much lesser extent from, for example, transport or storage.

Internationally, and since 2024 also nationally, there is experience in applying sustainability criteria in the selection of medicines. These developments will be built upon to drive greater consistency and harmonisation in sustainability standards.

The present set of criteria was selected based on the insights of the multidisciplinary composition of the project group, discussions with parties active in several countries and the available information from science, company reports and advisory reports. An impactful, measurable and achievable set of criteria for the first request for Sustainability in the Preference Policy.

**Criteria:**

In order to structurally integrate sustainability into the selection of preferred medicines by health insurers, it is necessary to formulate concrete and verifiable criteria. Only by applying these criteria will it be possible to identify the environmental impact of medicines and to explicitly consider sustainability in purchasing decisions. The criteria have been selected based on available knowledge of material topics related to pharmaceutical manufacturing. For the first phase, a limited but well-substantiated set was chosen, consisting of a request for information and five criteria that are in line with international practical experiences and existing sustainability assessment frameworks.

The five criteria cover different aspects of environmental impact and transparency in the pharmaceutical chain. The table below summarises the criteria, with a brief explanation of the background and a summary of the request.

NB: The exact wording of the question, the detailed explanation and the answer options to be chosen as they will be asked in the database are described per criterion in the Appendix.

| Criterion-subject | Components of the criterion | Level of inquiry |
|---|---|---|
| Production location | Production location API | Productlevel |
| | Production location End product (formulation) | Productlevel |
| Climate impact | Emissions at production site | Company level |

| | | |
|---|---|---|
| | Reduction target | Company level |
| On-site production with water scarcity[waterstress?] | Location with water scarcity | Productlevel |
| | Mitigating measures | Productlevel |
| Drug production in accordance with EU standards | Pollution at production site within limits of EU standards, regardless of production location | Productlevel |
| Pollution of production wastewater | API producer and finished product producer implement routines to achieve achieve contamination on or under PNEC-ENV | Productlevel |
| | What is the value and source of the PNEC-ENV or alternative standard used. | Productlevel |

**Application of the criteria:**

In the first phase, the focus is on providing information and not yet on comparing the results. The supplier must provide the answers for all criteria. This can also be a negative answer, so the 'no' or 'information is not available' option is a valid answer in the first phase. The year 2026 is therefore a baseline measurement.

Failure to answer all questions for the active substance in question and at company level is grounds for exclusion from the procurement process. Given the fact that answering the question is relatively simple and there is always the option of indicating that no information is available if this is the case, it is expected that no parties will (have to) be excluded.

A web application has been built for entering the data. Data is entered on the basis of the request per criterion. The exact wording of the request can be found in the appendix.

**Further development:**

The sustainability criteria will follow an incremental approach in the coming years. The first year starts with carrying out a baseline measurement of the availability of requested data. In the period up to 2030, the level of detail of the information requested, the way in which it is tested and the way in which answers are assessed in the procurement process will become more stringent across a number of phases, raising the bar of performance for all suppliers equally over time.

We currently distinguish three phases:

- Phase 1 (2026): introduction of the criteria with simple request for information, with a focus on the provision of information. To participate in the procurement tender, all questions must be answered. Example: Are scope 1, 2 and 3 emissions measured at the company level and is there a reduction target? Also, the request for these criteria will not apply to all products. We start with a

number of products (200-250 PRKs) to gain joint experience in both answering and assessing the request and the information provided.
- Phase 2 (2027/2028): deepening of the criteria. The responses are to be substantiated more concretely and quantitatively with data based on available literature, internal documentation and previous answers. The request will also apply to all products in the procurement process. The answers to the request for sustainability criteria will be assessed according to a scoring model, still to be determined. The outcome is taken into account or is used as an exclusionary criterion during the tender. This standard can consist of, for example, a minimum total score to be achieved on all criteria, or minimum values per criterion.
- Phase 3 – 2029/2030: the criteria are fully integrated into the procurement procedure. Data at product level is used as much as possible to make comparisons between products.

This phased tightening ensures that all parties involved – from producers to health insurers – are given the opportunity to build up knowledge, adjust processes and improve sustainability information. This creates a balanced development in which feasibility and ambition go hand in hand, with 2030 as the target year for a fully integrated and measurable sustainable procurement framework.

**Practical information regarding input:**
To support the provision of the desired information, an informative webinar will be organized before the start of the first purchasing round. Contact persons of suppliers will be informed about this in due course. This webinar will explain what new working method is expected of suppliers and how the requriements can be met.

Suppliers will receive notifications around the launch of this project about the start of using the secure database through which the criteria are requested. This notice asks for the creation of a user account, we strongly advise suppliers to do this soon, to avoid inconvenience under time pressure just before the start of the first tender.

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[i] https://www.farmacotherapeutischkompas.nl/farmacologie/milieu-impact-geneesmiddelen
[ii] Green Deal Sustainable Care 3.0
[iii] https://linkinghub.elsevier.com/retrieve/pii/S0959652624024272