EPA’s Comprehensive Procurement Guidelines: Program Overview and Current Activities

Southeast Recycling Development Council Workshop:
Recycling in Uncertain Times
October 15, 2020

https://www.epa.gov/cpg
Overview of Comprehensive Procurement Guideline Program

- Government buy-recycled program
- Authorized by the Resource Conservation and Recovery Act (RCRA), Section 6002
- Harnesses federal purchasing power to stimulate the demand for recovered materials
- Applies to procuring agencies using appropriated federal funds

- Widely referenced by government, universities, NGOs and the private sector

https://www.epa.gov/cpg
• EPA designates items that are or can be made with recovered materials and issues procurement recommendations for these items.
  • Designations are codified in Comprehensive Procurement Guidelines (CPGs).
  • Recommendations (recovered-material content levels and product specifications) are published in Recovered Materials Advisory Notices (RMANs)
• EPA has designated 61 items in CPGs and issued recommendations for their procurement in RMANs

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Current Activities

• This Summer, EPA solicited public comment on these existing CPG designations and RMAN recommendations (85 FR 19473) and is currently reviewing comments.

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EPA asked

Designated Items
• Based on procuring agencies purchases, are the right items designated?
• Do the items currently designated represent items that procuring agencies purchase?
• Should items be deleted, added or modified? Why?

Procurement Recommendations
• Are the recommended recovered content levels/ranges appropriate?
  o If not, please provide appropriate levels.
• Are the published specifications appropriate?
  o If not, please provide appropriate specifications.

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Public Comments on Existing CPG Designations and RMAN Recommendations

- 104 unique letters with a total of 405 comments were submitted.
- Most comments were submitted by industry (42%).

Fractions of Comments by Commenter Type

- Industry: 42%
- Anonymous/Private Citizens: 16%
- Environmental/Health NGO: 23%
- Government (Federal): 3%
- Government (state or local): 16%

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Of the substantive comments submitted (233 comments), most focused on designated items (~48%).
Summary of Comments by Key Product Category

Product categories with most comments were paper, construction and landscaping

Focus of Comments in Top Product Categories

<table>
<thead>
<tr>
<th>Product Category</th>
<th>Designations (%)</th>
<th>Recycled Content (%)</th>
<th>Specifications (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paper</td>
<td>27</td>
<td>63</td>
<td>10</td>
</tr>
<tr>
<td>Construction</td>
<td>62</td>
<td>33</td>
<td>5</td>
</tr>
<tr>
<td>Landscaping</td>
<td>40</td>
<td>0</td>
<td>60</td>
</tr>
</tbody>
</table>

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Detailed View: Designations

- Of the comments on CPG designations (115 comments), most were supporting addition of new designations (66%), followed by supporting revisions (20%) and supporting deletion of existing designations (8%).

Summary of Overall Comments Related to Designations

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Detailed View: Recycled Content Level

- Of the comments submitted on existing recovered-material recommendations in RMANs (81 comments), 90% were in support of revisions, while 10% supported keeping existing content levels.

Summary of Overall Comments Related to Recycled Content Levels

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Detailed View: Product Specifications

- Of the comments that focused on product specifications that are recommended in RMANs (37 comments), 76% supported revisions, while 24% supported existing specifications.

Summary of Overall Comments Related to Specifications

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Timeline of Activities

• **Public comment** on the existing CPG designations and RMAN recommendations closed this Summer.

• **Initial analysis** of comments has been occurring early this Fall.

• **In-depth analysis** will continue over the next few months.

• **Recommended actions** are anticipated for this Winter.

• **Strategy** outlining future activities will follow the development of recommended actions.

• Any future revisions to the CPG or RMANs will be noticed in the Federal Register.

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THANK YOU!

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