2007 CPG

COMPREHENSIVE PROCUREMENT GUIDELINES

Buy-Recycled Series

MISCELLANEOUS PRODUCTS

MISCELLANEOUS



Buying recycled products...

...conserves natural resources

...saves energy

...reduces solid waste

...reduces air and water pollutants

...reduces greenhouse gases

...creates new jobs

More and more procurement officials are realizing that buying recycled is an easy, cost-efficient, and earth-friendly alternative. Today's products made from materials recovered for recycling offer the strength, durability, and performance equivalent to those made from virgin materials. That is why businesses and public sector buyers across the country are buying and using recycled-content products.

To make it easier to buy recycled, the U.S. Environmental Protection Agency (EPA) periodically updates the Comprehensive Procurement Guidelines (CPG). Through the CPG, EPA designates items that must contain recycled materials when purchased with appropriated federal funds by federal, state, and local agencies, or by government contractors. Several miscellaneous products are among these items. These are items that do not correspond to any of the other seven CPG product categories. EPA's research shows that the items designated in the CPG are of high quality, widely available, and cost-competitive with virgin products. EPA also issues nonregulatory companion guidance—the Recovered Materials Advisory Notice (RMAN)—that recommends levels of recycled content for these items.

Why Buy Recycled?

Recycling is more than just dropping off your cans, bottles, and newspapers at the curb or at a local collection facility. Diverting recyclables from the waste stream is only the first of three steps in the recycling process. The second step occurs when companies use these recyclables to manufacture new products. The third step comes when you purchase products made from recovered materials.

Buying recycled products results in many environmental benefits. It supports local recycling programs by creating markets for the collected materials that are processed and used to manufacture new products. This creates jobs and helps strengthen the economy; conserves natural resources; saves energy; and reduces solid waste, air and water pollutants, and greenhouse gases that contribute to global warming.

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What Is CPG?

The Resource Conservation and Recovery Act (RCRA) requires procuring agencies to buy recycled-content products designated by EPA in the CPG. Issued in May 1995, the first CPG designated 19 new products and incorporated five previously designated items in eight product categories. The first CPG update (CPG II) was published in November 1997 and designated an additional 12 items, including pallets. A second CPG update (CPG III) was published in January 2000 and designated an additional 18 items, including sorbents, awards and plaques, industrial drums, mats, manual-grade strapping, and signage. The third CPG update (CPG IV), published in April 2004, designated seven new products, including bike racks and blasting grit. The fourth CPG update (CPG V), published in September 2007, designated one new item and revised another designation, but did not designate any new miscellaneous products. For more information, visit **<www.epa.gov/epaoswer/non-hw/procure/about.htm>**.

Procuring agencies include all federal agencies, and any state or local government agencies or government contractors that use appropriated federal funds to purchase the designated items. If your agency spends more than $10,000 per year on a product designated in the CPG, you are required to purchase it with the highest recycled-content level practicable. The CPG also applies to lease contracts covering designated items. Executive Order (E.O.) 13423 and the Federal Acquisition Regulation also call for an increase in the federal government's use of recycled-content and environmentally preferable products.

Once any new items are designated in a published CPG update, an agency has 1 year to develop an affirmative procurement program (or revise an existing one) to include these new items. In previous years, agencies have had to revise their affirmative procurement programs to incorporate buy-recycled requirements for items such as pallets, sorbents, awards and plaques, industrial drums, mats, manual-grade strapping, and signage. Agencies must have revised their affirmative procurement programs to include the new items designated in CPG IV by April 30, 2005. This effort might have involved reviewing specifications for these items and eliminating provisions that pose barriers to purchasing them with recycled content (such as aesthetic requirements unrelated to product performance).

The CPG acknowledges that specific circumstances might arise that preclude the purchase of products made with recovered materials. Your agency may purchase designated items that do not contain recovered materials if you determine that: 1) the price of a given designated item made with recovered materials is unreasonably high; 2) there is inadequate competition (not enough sources of supply); 3) unusual and unreasonable delays would result from obtaining the item; or 4) the recycled-content item does not meet the agency's reasonable performance specifications.

How Do I Purchase Recycled-Content Miscellaneous Products?

EPA issues purchasing guidance in RMANs, which are designed to make it as easy as possible to buy the designated items. The RMANs recommend recycled-content levels to look for when purchasing miscellaneous products, as shown in the table below. Following the RMANs' recommended levels will help ensure your affirmative procurement program and standards meet the buy-recycled requirements. The RMANs also provide other purchasing guidance. Please refer to **<www.epa.gov/cpg/products.htm>** for more information on individual products.

Rather than specifying just one level of recycled content, the RMANs recommend ranges that reflect actual market conditions. The recommendations are based on market research identifying recycled-content products that are commercially available, are competitively priced, and meet buyers' quality standards.

Access EPA's online recycled-content products database by going to **<www.epa.gov/cpg>** and selecting "Supplier Database." See the last section of this resource guide for other helpful resources.

EPA's Recommended Content Levels for Miscellaneous Products

MISCELLANEOUS PRODUCT	MATERIAL RECOVERED	POST-CONSUMER RECOVERED CONTENT	TOTAL RECOVERED CONTENT
Awards and Plaques[1]	Glass	75–100%	100%
	Wood	—	100%
	Paper	40–100%	—
	Plastic and Plastic/Wood Composite	50–100%	95–100%
Industrial Drums[1]	Steel[2]	16%	25–35%
	Plastic High-density Polyethylene (HDPE)	30–100%	—
	Fiber (paper)	100%	—
Mats[1]	Rubber	75–100%	85–100%
	Plastic	10–100%	100%
	Rubber/Plastic Composite	100%	—
Pallets[1]	Wood	95–100%	—
	Plastic	100%	—
	Thermoformed	25–50%	—
	Paperboard	50%	—

MISCELLANEOUS PRODUCT	MATERIAL RECOVERED	POST-CONSUMER RECOVERED CONTENT	TOTAL RECOVERED CONTENT
Signage[1]	Plastic[3]	80–100%	—
	Aluminum	25%	—
	Plastic Sign Posts/Supports[3]	80–100%	—
	Steel Sign Posts/Supports[4]	16% 67%	25–30% 100%
Sorbents[1]	Paper	90–100%	100%
	Textiles	95–100%	—
	Plastics	—	25–100%
	Wood[5]	—	100%
	Other Organics/ Multimaterials[6]	—	100%
Manual-Grade Strapping[1]	Polyester	50–85%	—
	Polypropylene	—	10–40%
	Steel[4]	16% 67%	25–30% 100%

[1] EPA's recommendations do not preclude procuring agencies from purchasing miscellaneous products manufactured using other materials. EPA simply recommends that procuring agencies, when purchasing miscellaneous products designated in the procurement guidelines, purchase these products containing recovered materials.

[2] The recommended recovered materials content levels for steel in this table reflect the fact that the designated item is generally made from steel manufactured in a Basic Oxygen Furnace (BOF). Steel from the BOF process contains 25–30 percent total recovered steel, of which 16 percent is post-consumer steel.

[3] Plastic signs and sign posts are recommended for nonroad applications only, such as, but not limited to, trailway signs in parks and directional/informational signs in buildings.

[4] The recommended recovered materials content level for steel in this table reflects the fact that the designated items can be made from steel manufactured from either a BOF or an Electric Arc Furnace (EAF). Steel from the BOF process contains 25–30 percent total recovered materials, of which 16 percent is post-consumer steel. Steel from the EAF process contains a total of 100 percent recovered steel, of which 67 percent is post-consumer.

[5] "Wood" includes materials such as sawdust and lumber mill trimmings.

[6] Examples of other organics include, but are not limited to, peanut hulls and corn stover. An example of multimaterial sorbents would include, but not be limited to, polymer and cellulose fiber combination.

[7] The recommended recovered materials content levels for steel in this table reflect the fact that the designated item may contain steel manufactured in either a BOF or an EAF, or a combination of both. Steel from the BOF process contains 25–30 percent total recovered steel, of which 16 percent is post-consumer. Steel from the EAF process contains 100 percent total recovered steel, of which 67 percent is post-consumer. According to industry sources, blasting grit containing a combination of BOF and EAF steel would contain 25–85 percent total recovered steel, of which 16–67 percent would be post-consumer. Since there is no way of knowing which type of steel was used in the manufacture of the item, the post-consumer and total recovered material content ranges in this table encompass the whole range of possibilities, i.e., the use of EAF steel only, BOF steel only, or a combination of the two.

How Can I Get More Information?

This resource guide and the following publications on buying recycled-content products are available on the Internet.



Information Available From EPA

- **The CPG: <www.epa.gov/cpg>**. This site describes EPA's effort to facilitate the procurement of products containing recovered materials, including information on CPG and RMANs, and an online database of manufacturers and suppliers of designated items.
- **EPA CPG Program: <www.epa.gov/cpg/pdf/cpg-fs.pdf>**. This resource guide provides general information about the CPG and the development of affirmative procurement programs.
- **Environmentally Preferable Purchasing (EPP): <www.epa.gov/epp>**. EPA's EPP program encourages and assists federal agencies in purchasing environmentally preferable products and services. The site explains EPA's proposed guiding principles for including environmental performance in purchasing decision-making, and includes case studies of successful pilot projects in both the public and private sectors.
- **Jobs Through Recycling: <www.epa.gov/jtr>**. EPA's Jobs Through Recycling program stimulates economic growth and recycling market development by assisting businesses and supporting a network of state and regional recycling contacts. This Web site provides information on financing and technical assistance for recycling businesses, as well as other market development tools.
- **Municipal Solid Waste: <www.epa.gov/msw>**. This site includes information on recycling, source reduction, and reuse. It contains state municipal solid waste data and the latest facts and figures on waste generation and disposal.
- **WasteWise: <www.epa.gov/wastewise>**. WasteWise is a free, voluntary EPA program through which organizations eliminate costly municipal solid waste, benefitting their bottom line and the environment. The program provides hands-on assistance to members to help them purchase or manufacture recycled-content products, prevent waste, and recycle solid waste materials.
- ***Federal Register* (FR): <www.epa.gov/cpg/backgrnd.htm>** and **<http://www.epa.gov/epaoswer/non-hw/procure/about.htm>**. Notices promulgating CPG I (60 FR 21370) and RMAN I (60 FR 21386), May 1, 1995. FR notices promulgating CPG II (62 FR 60961) and RMAN II (62 FR 60975), November 13, 1997. FR notices promulgating CPG III (65 FR 3070) and RMAN III (65 FR 3082), January 19, 2000. FR notices promulgating CPG IV (69 FR 24028) and RMAN IV (69 FR 24039), April 30, 2004. FR notices promulgating CPG V (72 FR 52475) and RMAN V (72 FR 52561), September 14, 2007.



Other Government Sources

- **U.S. General Services Administration (GSA) Environmental Products Overview: <www.gsa.gov/Portal/gsa/ep/channelView.do?pageTypeId=8207&channelPage=/ep/channel/gsaOverview.jsp&channelId=-12972>**. GSA offers a variety of environmental products and services to its federal customers to assist them in their efforts to comply with procurement responsibilities outlined in federal environmental laws and regulations. This overview contains information about environmentally oriented products and services in the Federal Supply Service Supply System. To access GSA Advantage!, GSA's Internet-based ordering system, and order any GSA product, visit **<www.gsaadvantage.gov>**.

- **Environmental Products Guide: <www.gsa.gov/Portal/gsa/ep/home.do?tabId=2>**. This guide is designed to help procurement officials identify environmentally preferable products and services. It contains nearly 3,000 items, including many recycled-content products.

- **Office of the Federal Environmental Executive (OFEE): <www.ofee.gov>**. OFEE's mission is to advocate, coordinate, and assist environmental efforts of the federal community in waste prevention, recycling, affirmative procurement of CPG items, and the acquisition of recycled and environmentally preferable products and services.

  - **Greening the Government: A Guide to Implementing Executive Order 13101: <www.ofee.gov/eo/greening.pdf>**. This guide provides detailed information on the requirements of E.O. 13101, which established a process for amending the CPG and issuing RMANs. E.O. 13101 preceded E.O. 13423 and established many requirements and definitions that are still in effect. Updated in February 2001, the E.O. is available from OFEE at **<www.ofee.gov>**.

  - **Executive Order 13423: Strengthening Federal Environmental, Energy, and Transportation Management: <http://ofee.gov/eo/eo13423_main.asp>**. Published in January 2007, this Order replaced E.O. 13101 and requires federal agencies to purchase green products and services, including recycled content products, energy- and water-efficient products, biobased products, and environmentally preferable products and services. Although E.O. 13423 revoked E.O. 13101, EPA continues to follow certain procedures of E.O. 13101 since they are consistent with the requirements of RCRA 6002(e).

  - **Federal Green Purchasing Program: <www.ofee.gov/gp/gp.asp>**. This program assists federal agencies to promote the acquisition of recycled content, environmentally preferable, and biobased products; non-ozone depleting substances; and products containing alternatives to certain priority chemicals. The program also assists agencies to implement the energy-related purchasing requirements, including the purchase of alternative fuel vehicles and alternative fuels. Training tools and other green purchasing guidance are available.

- **Federal Trade Commission: <www.ftc.gov/bcp/grnrule/guides980427.htm>**. The Federal Trade Commission issued Guides for the Use of Environmental Marketing Claims in May 1998.

- **California Recycled-Content Product Database: <www.ciwmb.ca.gov/RCP>**. This site contains information on reasons to buy recycled-content products and how to procure them, and provides access to a database with information on products, as well as manufacturers, distributors, reprocessors, mills, and convertors across the country who procure or produce these products.

- **King County Recycled Product Procurement Program: <www.metrokc.gov/procure/green/>**. This site describes the tools and techniques developed by King County, Washington, agencies for purchasing recycled products.



Additional Sources

- **Buy Recycled Business Alliance: <www.nrcrecycle.org>**. The Alliance includes over 3,200 companies and organizations committed to increasing their use of recycled-content products and materials in their day-to-day operations. The Alliance offers educational materials, a quarterly newsletter, and product-specific guides. Public purchasing entities can join for free. For more information, contact the National Recycling Coalition.

- **Official Recycled Products Guide: <www.dep.state.pa.us/wm_apps/recycledproducts/>**. This directory lists more than 5,000 manufacturers and distributors of recycled-content products.

- **Plastic Lumber Trade Association (PLTA): <www.plasticlumber.org>**. PLTA is a nonprofit membership organization working to promote the interests of the recycled plastic lumber industry. Its work includes collaborating with ASTM to set industry-wide standards for recycled plastic lumber.

- **Recycled Plastic Products Source Book: <www.americanplasticscouncil.org>**. This booklet lists more than 1,400 plastic products from approximately 300 manufacturers, including pallets.

Product Information—Industrial Drums

- **Reusable Industrial Packaging Association: <www.reusablepackaging.org>**. This association represents about 100 container reconditioners.

- **The Society of the Plastics Industry: <www.plasticsindustry.org>**. This trade association represents the fourth largest manufacturing industry in the United States.

Product Information—Pallets

- **National Wooden Pallet and Container Association (NWPCA): <www.nwpca.com>**. This international trade association represents manufacturers, recyclers, and distributors of pallets, containers, and reels. NWPCA also developed the Uniform Standards for Wood Pallets as a resource for pallet users and suppliers.

- **Sustaining Business & Jobs Through Pallet Repair & Reuse: <www.ilsr.org/recycling/palletreport.pdf>**. This report lists pallet reuse and recycling operations across the country and highlights case studies of model reuse programs.