

# EPA's Comprehensive Procurement Guidelines: Program Overview and Current Activities

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

U.S. EPA



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# *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

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- 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?
  - If not, please provide appropriate levels.
- Are the published specifications appropriate?
  - If not, please provide appropriate specifications.

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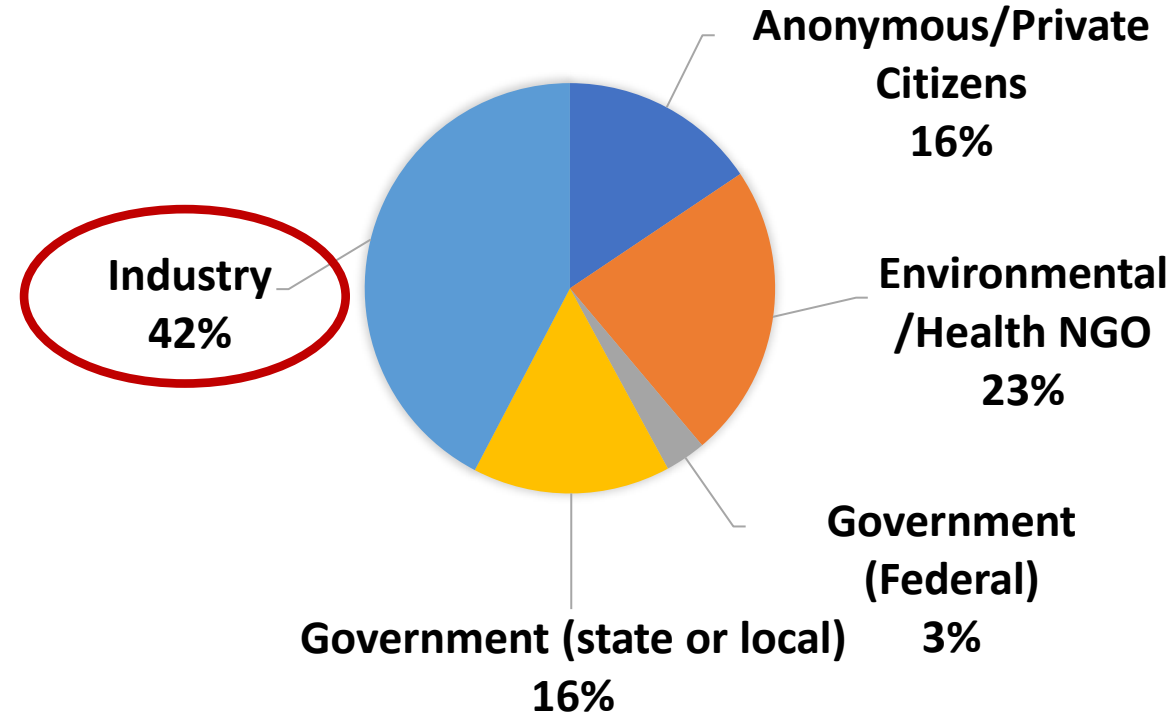


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# Public Comments on Existing CPG Designations and RMAN Recommendations

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



Fractions of Comments by Commenter Type

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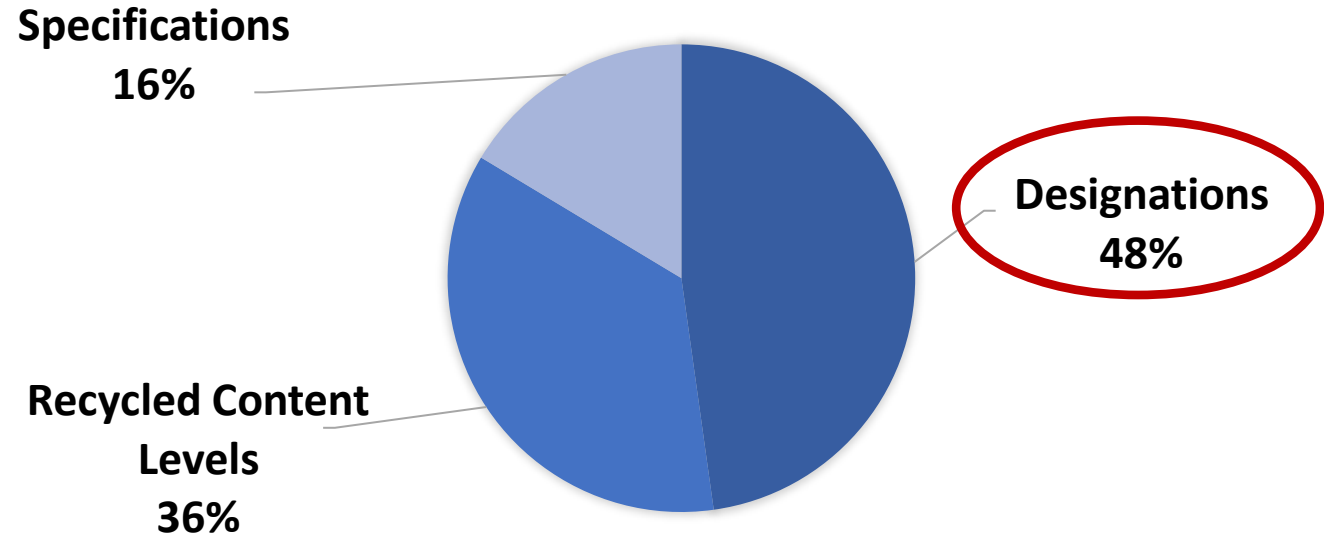


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# Comment Categorization

- Of the substantive comments submitted (233 comments), most focused on designated items (~48%).



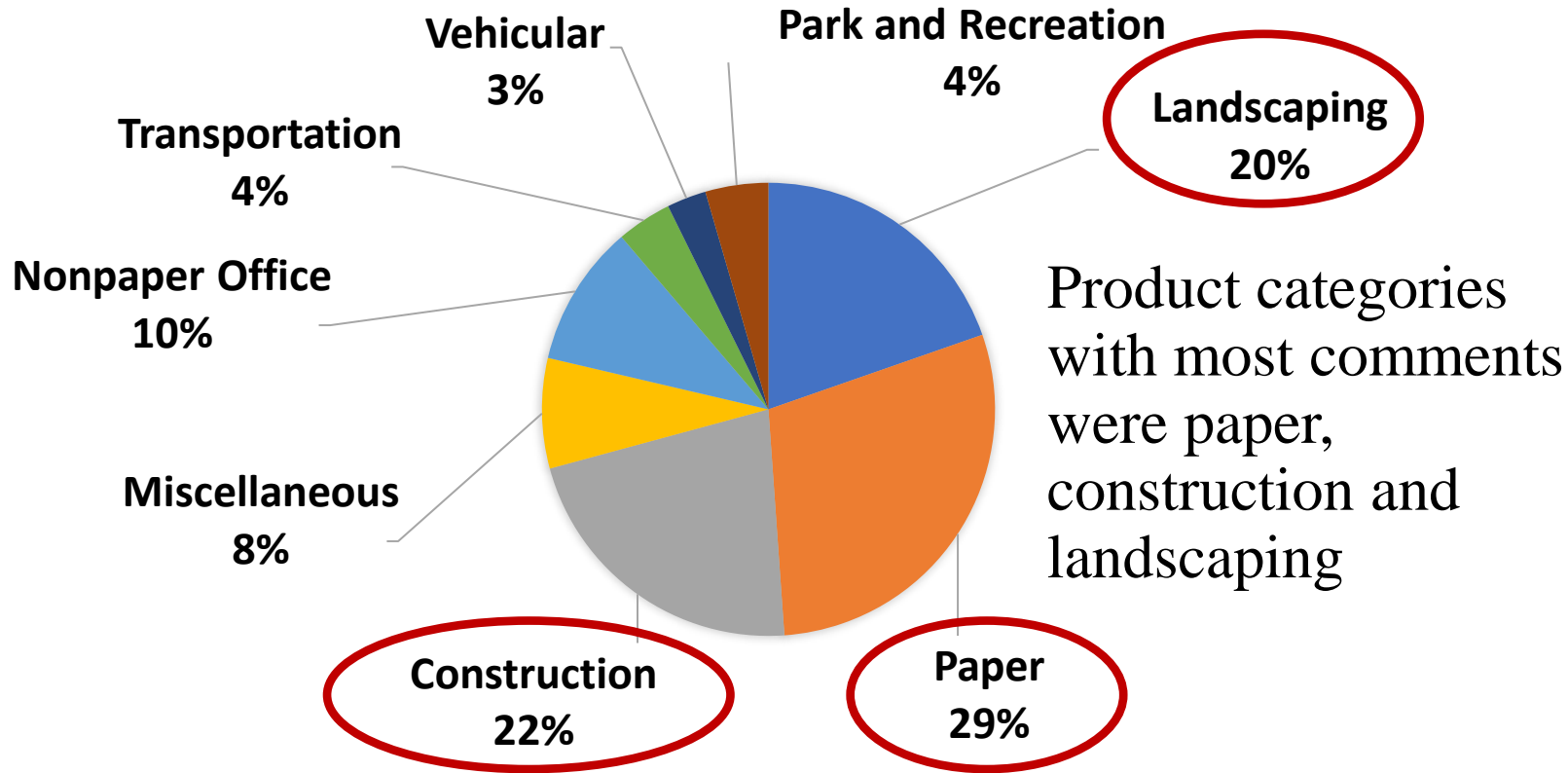
**Fractions of Comments Focused on Designations, Recycled Content Levels and Specifications**

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Summary of Comments by Key Product Category

## Focus of Comments in Top Product Categories

Product Category	Designations (%)	Recycled Content (%)	Specifications (%)
Paper	27	63	10
Construction	62	33	5
Landscaping	40	0	60

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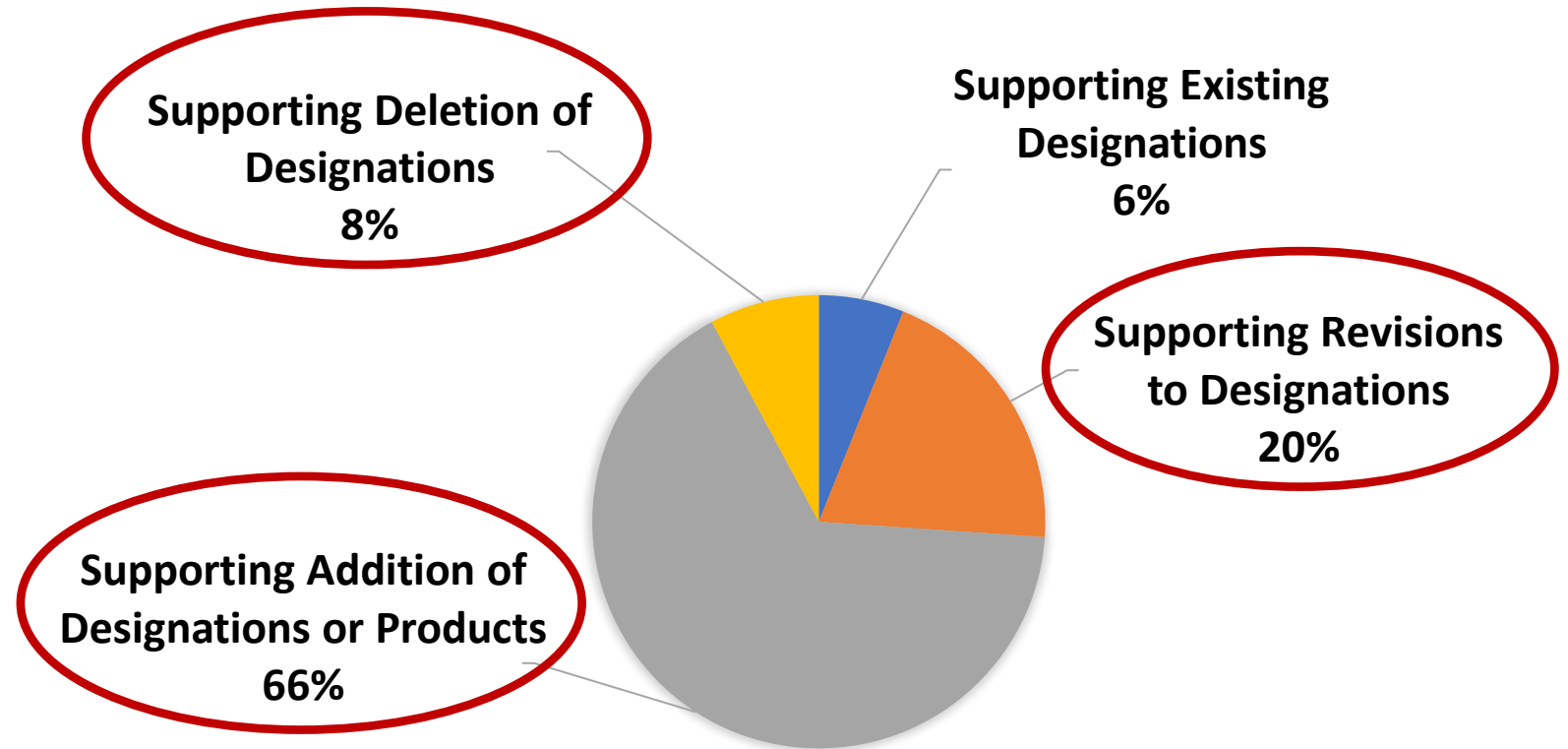
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# Detailed View: Designations

- 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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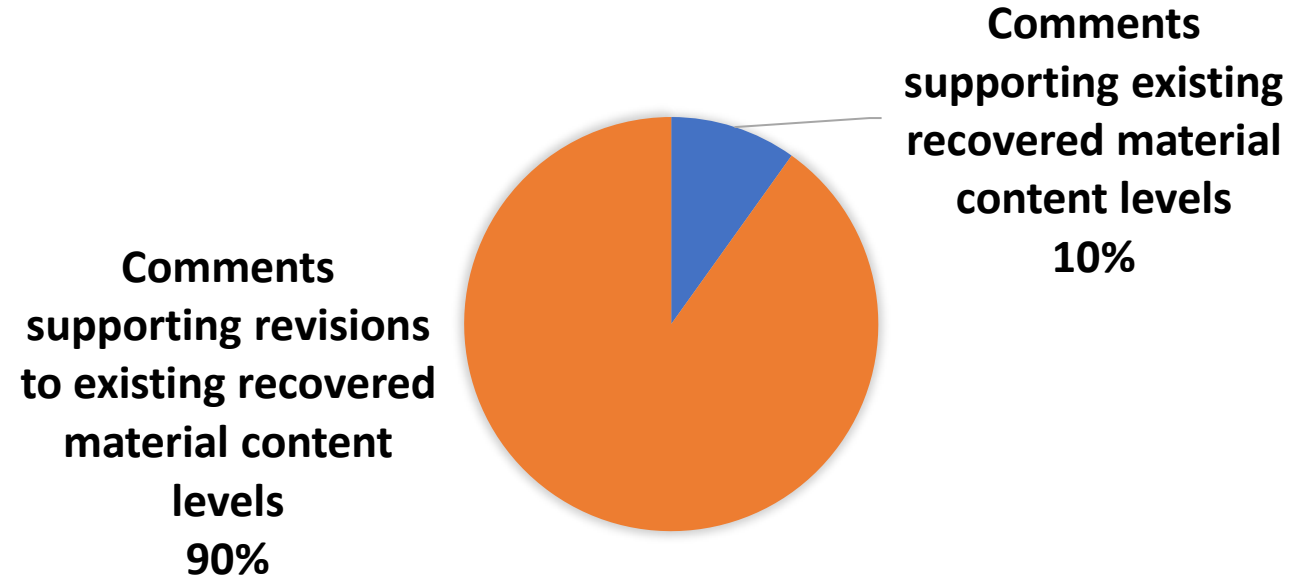


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# *Detailed View: Recycled Content Level*

- 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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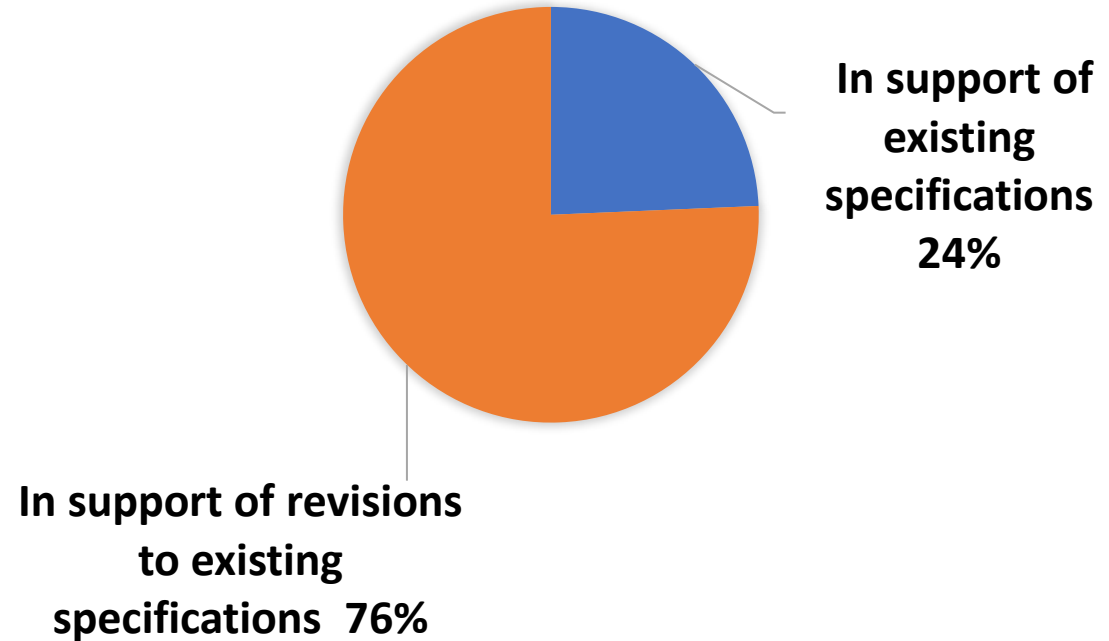


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# Detailed View: Product Specifications

- 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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