

2007

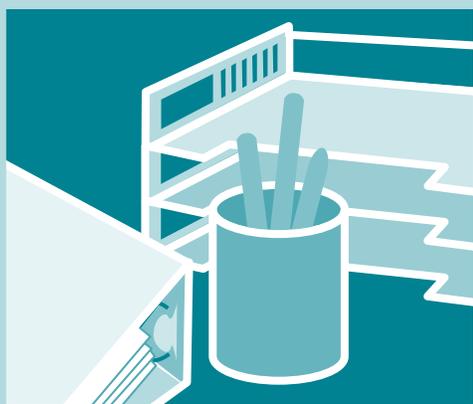
CPG

COMPREHENSIVE PROCUREMENT GUIDELINES

Buy-Recycled Series

NONPAPER OFFICE PRODUCTS

NONPAPER OFFICE



Buying recycled products...

- ...conserves natural resources
- ...saves energy
- ...reduces solid waste
- ...reduces air and water pollutants
- ...reduces greenhouse gases
- ...creates new jobs

The soda bottle you recycled after lunch might end up back on your desk as a recycled binder or pencil holder. Used toner cartridges and printer ribbons once considered “trash” are now remanufactured and returned, providing your office with high-performance products at considerable savings.

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 nonpaper office products are among these items. 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 those 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 (including binders, office recycling containers, office waste receptacles, plastic desktop accessories, plastic trash bags, and toner cartridges) 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 plastic envelopes and printer ribbons. A second CPG update (CPG III) was published in January 2000 and designated an additional 18 items, including plastic binders, plastic clipboards, plastic file folders, plastic clip portfolios, and plastic presentation folders. The third CPG update (CPG IV), published in April 2004, designated seven new products, including office furniture. The fourth CPG update (CPG V), published in September 2007, designated one new item and revised another designation, but did not designate any new nonpaper office 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 recycling containers; waste receptacles; plastic desktop accessories; plastic covered, paper covered, and pressboard binders; trash bags; toner cartridges; printer ribbons; plastic envelopes; plastic binders; plastic clipboards; plastic file folders; plastic clip portfolios; and plastic presentation folders. Agencies must have revised their affirmative procurement programs to add the items designated under CPG IV by April 30, 2005. This effort might have involved reviewing specifications for this product and eliminating provisions that pose barriers to procuring it with recycled content (such as aesthetic requirements unrelated to product performance). Also, be aware that paper envelopes were designated in CPG I. Recommended recycled-content ranges for paper envelopes are addressed in the RMAN for paper products and also can be found in the Buy-Recycled Series Paper Products resource guide.

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 it determines 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 Nonpaper Office 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 office 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 Nonpaper Office Products

NONPAPER OFFICE PRODUCT	MATERIAL RECOVERED	POST-CONSUMER RECOVERED CONTENT	TOTAL RECOVERED CONTENT
Recycling Containers and Waste Receptacles ¹	Plastic	20–100%	—
	Steel ²	16%	25–30%
	Paper		
	– Corrugated	25–50%	25–50%
	– Solid Fiber Boxes	40%	—
	– Industrial Paperboard	40–80%	100%
Desktop Accessories including Desk Organizers, Sorters, Trays, and Memo, Note, and Pencil Holders ¹	Plastic (Polystyrene [PS])	25–80%	—
Binders ¹	Plastic-covered	—	25–50%
	Paper-covered	75–100%	90–100%
	Pressboard	20%	50%
	Solid Plastic		
	– High-density Polyethylene (HDPE)	90%	90%
	– Polyethylene (PE)	30–50%	30–50%
	– Polyethylene Terephthalate (PET)	100%	100%
	– Miscellaneous Plastics	80%	80%



NONPAPER OFFICE PRODUCT	MATERIAL RECOVERED	POST-CONSUMER RECOVERED CONTENT	TOTAL RECOVERED CONTENT
Trash Bags ¹	Plastic	10–100%	—
Toner Cartridges ^{1,3}	See Endnote 3	See Endnote 3	See Endnote 3
Printer Ribbons ^{1,4}	See Endnote 4	See Endnote 4	See Endnote 4
Plastic Envelopes ¹	Plastic	25%	25–30%
Plastic Clipboards ¹	HDPE	90%	90%
	PS	50%	50%
	Miscellaneous Plastic	15%	15–80%
Plastic File Folders ¹	HDPE	90%	90%
Plastic Clip Portfolios	HDPE	90%	90%
Plastic Presentation Folders ¹	HDPE	90%	90%
Office Furniture	Furniture Structure – Steel ² – Aluminum	16% —	25–30% 75–100%
	Particleboard/Fiberboard Component ⁵ – Wood or Wood Composite – Agricultural Fiber	Greater than 0% —	80–100% 100%
	Fabric – PET	100%	100%
	Plastic Furniture Component – HDPE	70–75%	95%
	Remanufactured or Refurbished Furniture – Various	25–75%	25–75%

¹ EPA's recommendations do not preclude procuring agencies from purchasing nonpaper office products made from the materials manufactured using other materials, such as wood or cloth. EPA simply recommends that procuring agencies, when purchasing nonpaper office products made from the materials 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 materials, of which 16 percent is post-consumer steel.

³ EPA recommends the return of used toner cartridges for remanufacturing and reuse or purchasing a remanufactured or recycled-content replacement cartridge.

⁴ EPA recommends the procurement of printer ribbon reinking or reloading services, or reinked or reloaded printer ribbons.

⁵ Particleboard and fiberboard used in the wood components of office furniture also may contain other recovered cellulosic materials, including paper, wheat straw, and bagasse. The percentages of these materials contained in the product also would count toward the recovered materials content level of the item. In addition, while EPA has no evidence or indication that wood treated with chromated copper arsenate (CCA) is currently used in office furniture, EPA is not recommending the use of CCA-treated wood as a recovered material in office furniture. The arsenic in CCA is a known human carcinogen and EPA is currently conducting a thorough and comprehensive risk assessment of CCA as a part of the pesticide reregistration process for CCA. In addition, EPA is conducting a risk assessment for children who contact CCA treated wood playsets and decks.



How Can I Get More Information?

This resource guide and the following resources on buying recycled-content products can be accessed 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/cpgfs.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 posts 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/background.htm> and <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>.
 - **Recycling Collection Containers and Specialty Waste Receptacles, Federal Supply Schedule Group 72, Part 7, Schedule B:** Lists a variety of containers and receptacles available for purchase. For more information, contact GSA.
 - **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:** <<http://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. Training tools and other green purchasing guidance are available.
- **Federal Trade Commission:** <www.ftc.gov/bcp/gnrule/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 converters 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.nrc-recycle.org/>. The Alliance includes over 3,200 companies and organizations committed to increasing the 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.
- **Javits-Wagner-O'Day (JWOD):** <www.jwod.com>. The JWOD Program creates jobs and training opportunities for people who are blind or have other severe disabilities. JWOD's online "environmentally friendly products store" provides office supplies, including several CPG-designated items such as recycled-content clipboards.
- **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.
- **Recycled Plastic Products Source Book:** <www.americanplasticscouncil.org>. This booklet lists more than 1,400 plastic products from approximately 300 manufacturers, including nonpaper office products.
- **Recycling Data Network Information Services:** <www.recyclingdata.com/contents.htm>. This commercial Web site provides access, on a subscription basis, to a recycled-content products database of over 4,500 listings in 700 product classifications. It also provides a reference guide and a newsletter. The product database is considered to be the largest of its kind.

