

Administering Your Affirmative Procurement Program



Six Steps to
Achieving
Compliance





Affirmative Procurement as a Subset of Environmentally Preferable Purchasing

EPP

- May involve a **multitude of attributes**
 - Reduced toxicity, less packaging, reparability, energy savings, create less HW, recycled content
- Products not specifically identified

AP

- Limited to **Recycled Content (Biobased in future)**
- Products identified by EPA in Comprehensive Procurement Guidelines (CPGs)
- Guidance and Standards in Recovered Material Advisory Notices (RMANs)



Why Affirmative Procurement?



The Federal government spends \$200 Billion every year on goods and services – and has put this buying power behind the country's recycling programs



AP Benefits

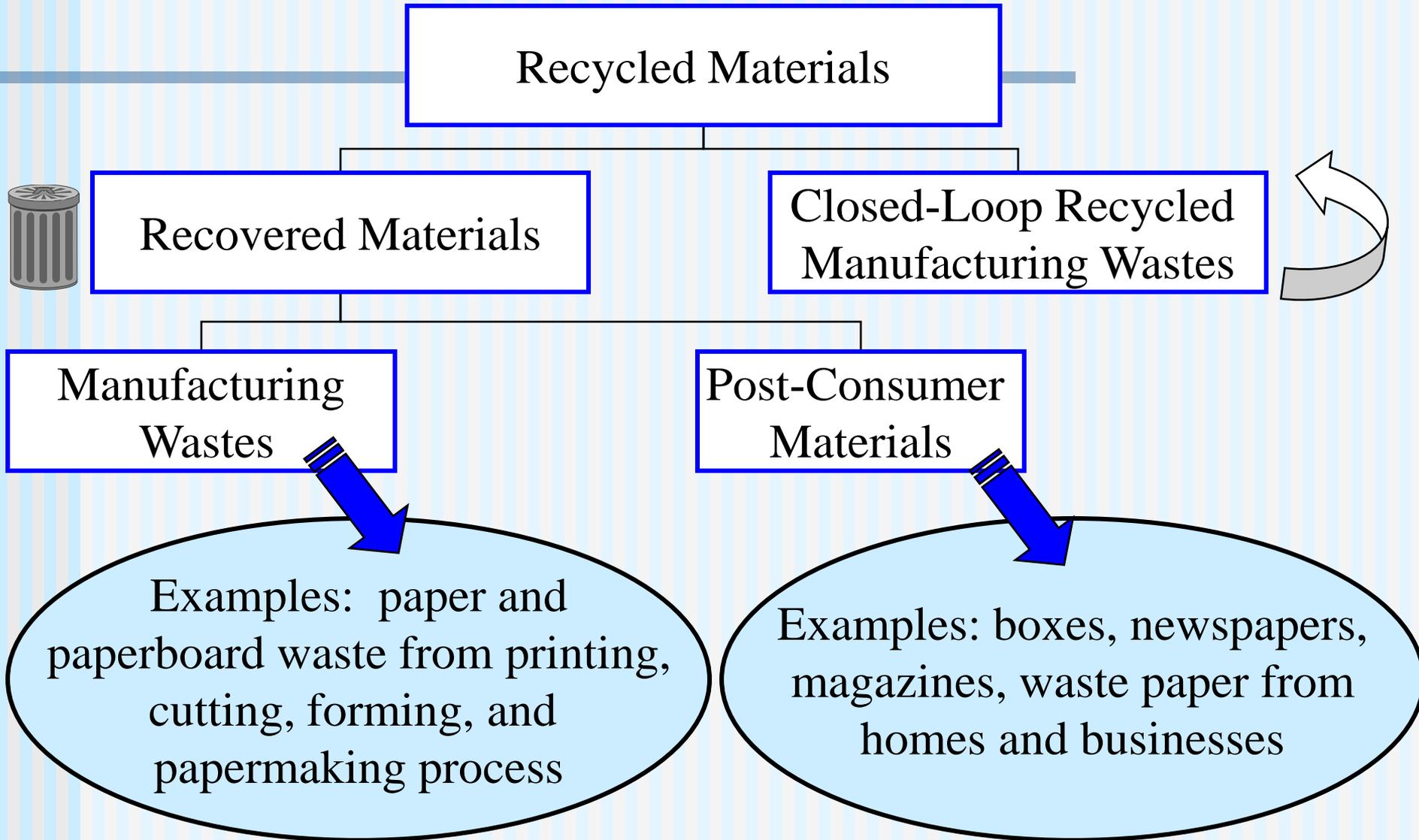
- ✦ Creates recycling markets
- ✦ Saves energy
- ✦ Conserves resources
- ✦ Saves money
- ✦ Saves landfill space
- ✦ Reduces pollution
- ✦ Creates jobs
- ✦ Provides incentive for manufacturers to alter processes
- ✦ Promotes environmental stewardship



**Purchasing recycled products
completes the recycling loop!**



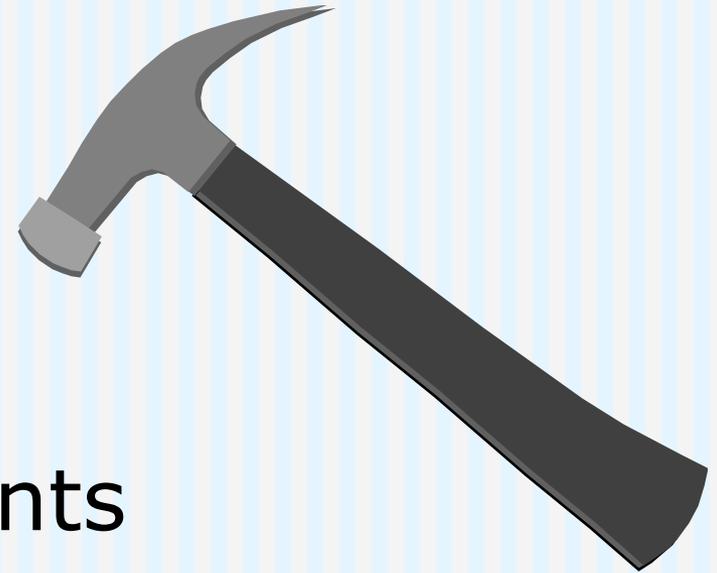
Definitions





Why Affirmative Procurement?

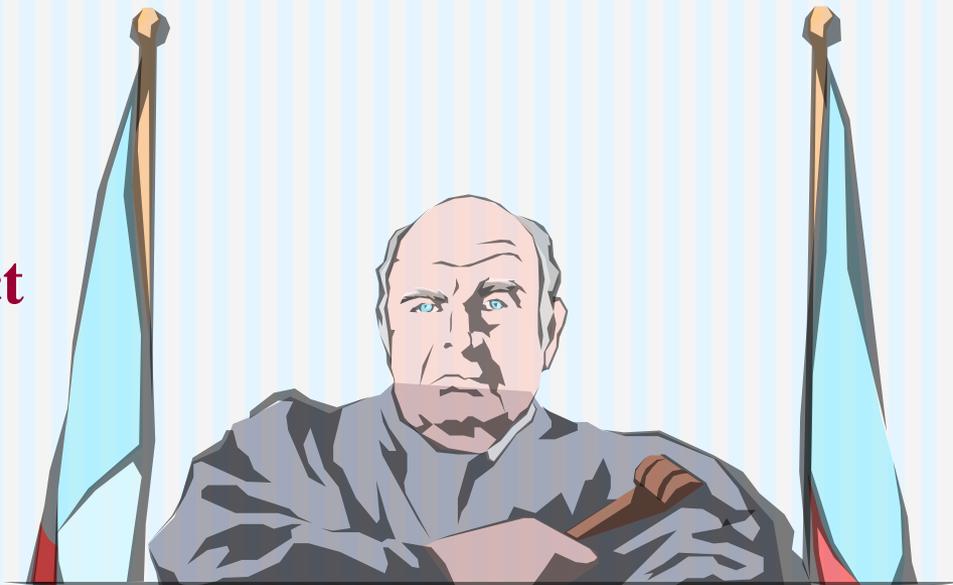
- Required by Law, Regulation, and Executive Order
- Enforced by EPA
- Reporting Requirements In Effect





AFFIRMATIVE PROCUREMENT:

IT'S THE LAW



**Resource
Conservation
And Recovery Act**

**Executive Order
13101**

**Federal
Acquisition
Regulations**

2002 Farm Bill



Resource Conservation and Recovery Act (1976)

RCRA Section 6002:
Federal Agencies must have
AP programs, EPA
must designate products

Federal facilities
purchase products made
with recovered materials
in accordance with the
CPGs

EPA Publishes
Comprehensive
Procurement
Guidelines

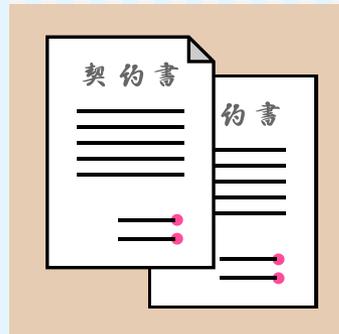




Federal Acquisition Regulations

■ Subpart 23.4 – Use of Recovered Materials

- Requires contractors to provide recycled-content products where identified in specifications



■ Subpart 4.3 – Paper Products

- Requires contracts involving paper documents to include printing double-sided on recycled paper



EO 13101 – Greening the Government Through Waste Prevention, Recycling and Federal Acquisition (1998)



- Required federal agencies to follow Comprehensive Procurement Guidelines published in the Federal Register
- Directed EPA to include AP in RCRA compliance inspections
- Required agencies to provide AP training



When Must We Purchase CPG Items With Recycled Content?

- When purchasing designated items, unless:

PRICE



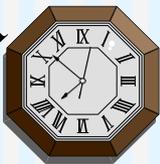
- The price of the recycled-content item is unreasonable, or

PERFORMANCE



- The performance of the recycled-content item is inadequate, or

AVAILABILITY



- The item is not available within a reasonable time frame or at a sufficient level of competition

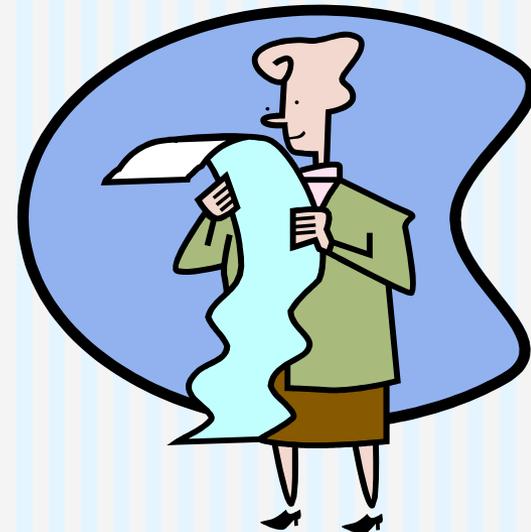


EPA-Designated Product Categories

- Construction
- Landscaping
- Non-paper Office
- Paper and Paper Products
- Parks and Recreation
- Transportation
- Vehicular
- Miscellaneous

**There are 54
products in all**

**11 new products
proposed August 01**





Examples of CPG Products

- Insulation
- Carpet
- Floor tiles
- Compost
- Paper
- Traffic cones
- Parking stops
- Binders



- Trash bags
- Waste receptacles
- Toner cartridges
- Fencing
- Pallets
- Sorbents
- Lubricating oils
- Retread tires



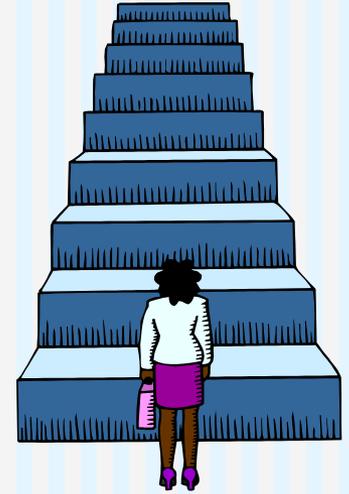
Implementation of AP at DOD Installations

Six Steps For Getting Started





IMPLEMENTATION



- ✓ Step 1. Get Command Support
- ✓ Step 2. Assign Roles & Responsibilities
- ✓ Step 3. Identify Purchasing Mechanisms
- ✓ Step 4. Develop Policy
- ✓ Step 5. Train Personnel & Promote AP
- ✓ Step 6. Initiate Reporting &
Recordkeeping Procedures



Step 1: Get Command Support

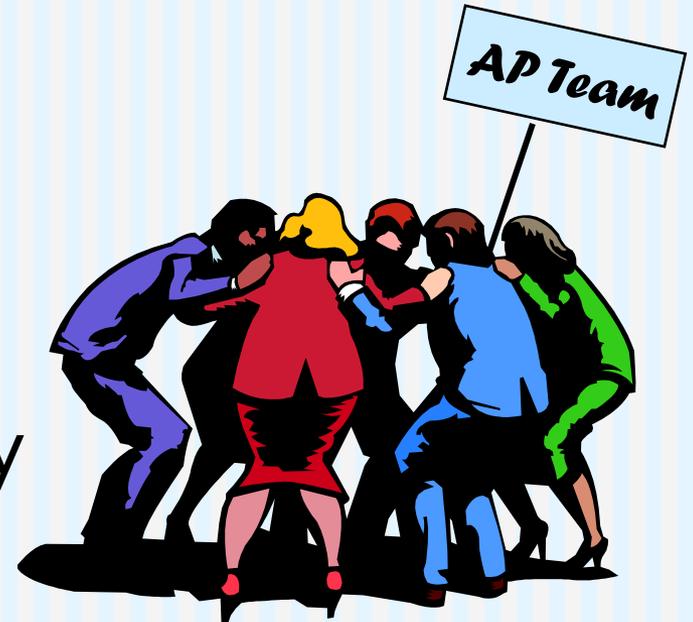
- Commander should:
 - Issue/endorse the AP policy
 - Appoint the AP Team Leader
 - Support installation AP efforts





Step 2: Assign Responsibilities

- Program Manager
- AP Team Members
 - Director of Contracting
 - Director of Logistics/Supply
 - Environmental Office
 - Credit Card Administrator /Trainer
 - Administrative Pool





Responsibilities



- **“Technical or requirements personnel and procurement personnel are responsible for the preparation, implementation, and monitoring of affirmative procurement programs.”
FAR 23.404(a)**



Who Should Be Involved?

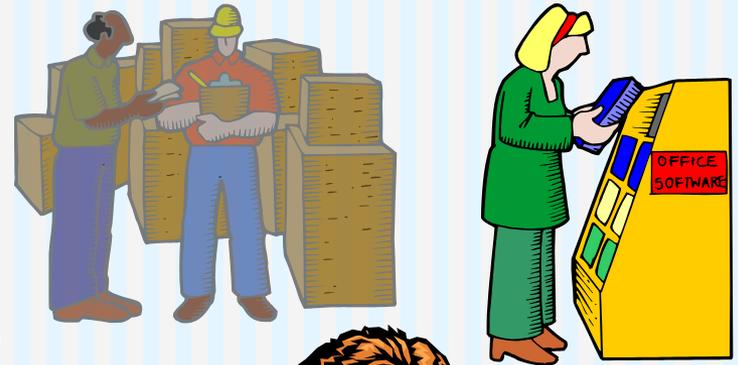
- ♣ Procurement/Contracting Officers
- ♣ Credit Card Users and Trainers
- ♣ Acquisition Program Personnel
- ♣ Logistics/Supply Personnel
- ♣ Directorate of Public Works
- ♣ Designers and Planners
- ♣ Environmental Office
- ♣ Office Assistants
- ♣ COTRs





Step 3: Identify Purchasing Mechanisms

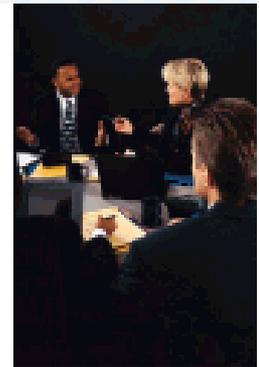
- Contracts
- Credit Cards
- Logistics/Supply Orders
- Direct/Local Purchase
- Onpost Supply Store
- Federal Supply System
- Online





Challenges

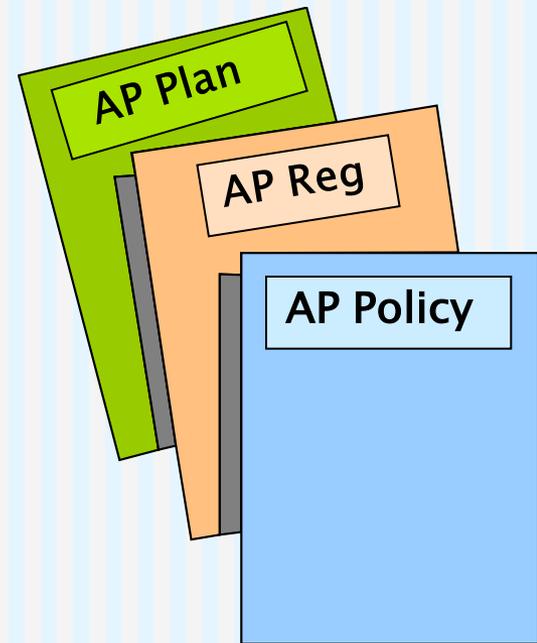
- Identifying requirements generators
 - Sometimes a large number
 - In various tenant organizations
- Dealing with multiple contracting offices





Step 4: Develop Policy

- Installation Policy
- Installation Regulation
- Installation AP Plan





Key Policy Issues



- Goals and Objectives
- Justification for Exceptions
 - What is Unreasonable Price?
 - How is Performance Measured?
 - What is Reasonable Time Frame?
- Procedures for Written Justifications
- Approval Authority for Justifications



Step 5: Provide Training and Promote AP

- Reach the personnel who actually purchase materials, create scopes of work and specifications, or administer the contracts





Types of Training

- Command Briefing
- EQCC Presentation
- General AP Training
- Training of Contracting/Procurement Officers
- Incorporate AP into Credit Card User Training, Manuals, and Inspection Checklists





AP Promotion



- Signs/Labels in Onpost Store
- Email Messages
- Bulletin Boards
- Incentive Programs
- Success Stories



Base Store in Homestead ARB



Step 6: Initiate Reporting & Recordkeeping Procedures

- Use DD 350 for AP in contracts
- Establish a file for written justifications when AP exceptions are used (for purchases $>$ \$2,500)
- Keep records of training





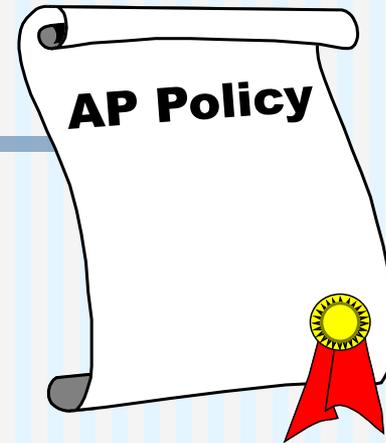
For More Information...



- EPA (AP) - www.epa.gov/cpg
- EPA (EPP) - <http://www.epa.gov/opptintr/epp/>
- OFEE - www.ofee.gov
- CHPPM - chppm-www.apgea.army.mil/GWSWP/SolidWaste/Affirmpro.htm
- AFCEE - www.afcee.brooks.af.mil/



Will We Be Ready?



For More Information
Contact:
USACHPPM
DSN 584-5201/584-5202
Comm (410) 436-5201/5202

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