



CONTRACT LAW DIVISION

Office of Assistant General Counsel for Finance and Litigation



A Lawyer's View of Green Contracting

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Green Contracting by Amy Kiger Crotts¹

Introduction

According to the Environmental Protection Agency ("EPA"), the United States consumes approximately 25% of the world's resources yet only composes 5% of the world's population. The U.S. federal government is the single largest consumer of goods and services in the U.S. and directly spends more than \$200 billion each year for the procurement of goods and services. An additional \$240 billion is spent indirectly through federal grant disbursements. In recognition of this tremendous purchasing power, President Clinton issued Executive Order 13101, *Greening the Government Through Waste Prevention, Recycling and Federal Acquisition* on September 14, 1998, superceding E.O. 12873, *Federal Acquisition, Recycling and Waste Prevention* issued October 20, 1993. The overall goal of E.O. 13101 is to incorporate environmental considerations into government decision-making. It is an important part of a web of environmentally focused laws, executive orders, regulations², agency directives, policies and mission statements designed to make the federal government a leader and example in the conservation and efficient use of natural resources. Guidance on the implementation of E.O. 13101 has recently been issued by several sources. The purpose of this Lawyer's View is to focus on the "Greening" of government procurement, outline the relevant requirements of E.O. 13101 and make our procurement professionals aware of the resources available to them in ensuring compliance with the order.

What does "Green" Mean?

"Greening the Government" is a broad term encompassing pollution and waste prevention, recycling, affirmative procurement, environmentally preferable products and services, and energy and water use reduction. The concept is succinctly illustrated by the "green hierarchy": **reduce, reuse, recycle**, in that order. It is the national policy that pollution should be prevented or reduced at its source. Pollution that cannot be prevented should be recycled, and that which cannot be prevented or recycled should be treated in an environmentally safe manner with disposal into the environment being the last resort. Pollution prevention can be achieved through more efficient use of raw materials, energy and water, or through conservation. Similarly, recycling and waste reduction conserve resources and energy and decrease the need to dispose of waste into the environment. Affirmative procurement is the federal government's use of its vast purchasing power to advance environmental goals and stimulate markets for environmentally preferable goods and services. Environmentally preferable products and services are those "having lesser or reduced impacts on human health and the environment when compared to competing products and services."³ Therefore, in order to "green the government" procurement professionals need to practice what could be termed "Green Contracting."

Why Is Green Contracting Important?

Why should we care about green contracting? Well, for one, it's the law. But even if it weren't, there would still be some very important common-sense reasons why federal agencies should reduce waste and buy recycled products. Buying recycled, recyclable and waste-reduced products can save the government money in the long run when the government's true costs are analyzed using life cycle cost⁴ methodologies.

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²Part 23 of the Federal Acquisition Regulation (FAR) addresses environmental requirements but has not yet been amended to implement E.O. 13101.

³E.O. 13101 §201.

⁴"Life cycle cost" is the amortized annual cost of a product including capital costs, installation costs, operating costs,



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How much will the government spend on each widget from the time it is purchased throughout its usable life to its ultimate disposal? A disposable single-use non-recyclable widget may not be so economical after determining the actual cost of the extraction and processing of its raw materials, its manufacture, packaging, purchase, transport, the need for continuous replacement, disposal of the widget and its packaging, and the resulting indirect costs to the environment for which the government may be ultimately responsible. Federal demand for products using more recovered materials encourages growth in the marketplace as manufacturers try to meet those demands, creating jobs and economic development opportunities and fostering competition and innovation in recycling and remanufacturing. As more recycled materials are used in remanufacturing, the markets for those materials become more stable which improves revenue from community recycling programs, encouraging even more recycling. This in turn reduces the amount of recyclable material disposed of in landfills and combustion facilities and also prevents pollution caused by the extraction and processing of raw materials. This cause and effect has been termed “closing the circle” among the recycling, manufacturing and purchasing sectors.

Reduction of waste and buying recycled products reduces the dependence on virgin resources and conserves the energy used in its extraction and processing. State and local governments and even other nations look to the U.S. federal government for leadership in acquisition policy. The U.S. government can set an example for them and for the private sector and demonstrate that recycling and buying recycled, recyclable and waste-reduced products is a win-win solution for the government, tax-payers and the nation by procuring reasonably priced quality goods and services while using our natural resources efficiently.

The Basics of E.O. 13101

E.O. 13101 reiterates Section 6002 of the Resource Conservation and Recovery Act of 1976 (RCRA)⁵ which requires the federal government to buy recycled products to the maximum extent practicable. The order requires federal agencies to acquire and use environmentally preferable products and services and to develop cost-effective procurement preference programs to favor the purchase of those goods and services. Also to be favored is a new category of “biobased” products. Biobased products are commercial or industrial products, other than food or feed, that utilize biological products or renewable domestic agricultural (plant, animal or marine) or forestry materials. The order retains and emphasizes the RCRA’s requirement that agencies implement the EPA procurement guidelines for retread tires and re-refined lubricating oils, including designated biobased oils. And the minimum content standard for printing and writing paper was raised by the order to no less than thirty (30) per cent post-consumer materials.

In addition to requiring the acquisition of particular environmentally preferable goods and services, E.O. 13101 looks to change the process of acquisitions. Section 401 of E.O.13101 states:

In developing plans, drawings, work statements, specifications, or other product descriptions, agencies shall consider, as appropriate, a broad range of factors including: elimination of virgin material requirements; use of biobased products; use of recovered materials; reuse of product; life cycle cost; recyclability⁶; use of environmentally preferable products; waste prevention (including toxicity reduction or elimination); and ultimate disposal. These factors should be considered in acquisition planning for all

maintenance costs, and disposal costs discounted over the life of the product.

⁵42 U.S.C. §6901, et. seq., §6002, “Federal Procurement”.

⁶“Recyclability” is the degree to which a product of material may be recovered or otherwise diverted from the solid waste stream for the purpose of recycling.



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procurement and in the evaluation and awards of contracts, as appropriate.

In other words, agencies are to consider environmental factors at every stage in the procurement process. In developing, reviewing and revising specifications, product descriptions and standards, agencies are to consider the use of recovered materials, preferable purchasing criteria developed by the EPA and ensure that the criteria are followed. The order requires that executive agency heads incorporate waste prevention and recycling in the agency's daily operations. Each agency is to establish long term goals for waste prevention and for the increased procurement of products made with recovered materials and collect information on progress towards those goals.⁷ Also, E.O. 13101 reiterates the existing requirement that agencies include in contracts for contractor operation of government-owned or -leased facilities, and contracts that provide support services at such facilities, provisions that obligate the contractor to employ environmentally sound and energy-efficient acquisition policies.

E.O. 13101 Participants and Their Roles

The implementation of E.O. 13101 requires the input, research and coordination of a number of individuals, groups and agencies. The position of **Federal Environmental Executive (FEE)**⁸ was created by E.O. 12873, the predecessor to E.O. 13101. The FEE is appointed by the President and is charged with taking all actions necessary to ensure that agencies comply with the order; this includes developing a

Government-wide Strategic Plan on implementation.⁹ The FEE is also responsible for submitting a biennial report to the President regarding government-wide progress.¹⁰ Fran McPoland has been the FEE since 1996. E.O. 13101 directs the head of each major procuring agency¹¹ to appoint an **Agency Environmental Executive (AEE)** who serves at no lower than the Assistant Secretary Level or equivalent. The AEE is responsible for translating the Government-wide Strategic Plan into specific agency plans, implementing the specific agency plan, tracking and reporting the agency's progress on implementation to the FEE. The AEE for the Department of Commerce is Ms. Linda Bilmes, Assistant Secretary for Administration.¹² The order establishes a **Steering Committee** composed of the Chair for the Council on Environmental Quality (CEQ)¹³, the FEE and the Administrator for Federal Procurement Policy (OFPP).¹⁴ The Steering Committee is responsible for chartering a **Task Force** and providing policy direction for the Task Force. The Task Force is chaired by the FEE and includes agency representatives from the major procuring agencies. The purpose of the Task Force is to assist the agencies in the implementation of E.O. 13101. The Task Force recently issued *A Guide to Implementing Executive Order 13101*, which is an

⁹The Government-wide Strategic Plan is available on-line in PDF format at <http://www.ofee.gov/html/strtpln1.pdf> and in HTML format at <http://www.ofee.gov/html/strtpln2.htm>.

¹⁰ The 2000 FEE Report can be found in PDF format at <http://www.ofee.gov/html/greening2.pdf>.

¹¹E.O. 13101 §214 defines a "major procuring agency" as any executive agency that procures over \$50 million per year of goods and services.

¹²A list of AEEs as of April 2000 is available at online in Appendix B (page 104) of the document at <http://www.ofee.gov/html/greening.pdf>. A current list is projected to be available soon at the OFEE website <http://www.ofee.gov/>.

¹³The Council's website is at <http://www.whitehouse.gov/CEQ/>.

¹⁴The website for the Office of Federal Procurement Policy is at <http://www.whitehouse.gov/OMB/procurement/index.html>.

⁷A reporting system on the implementation of E.O. 13101 is under development by the White House Working Group on Reporting and is not expected until sometime in FY 2001; the goal is to meet program requirements without being too labor intensive.

⁸The Office of the Federal Environmental Executive maintains a website at <http://www.ofee.gov/> which outlines its history, best practices and success stories and related resources and websites.



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excellent in-depth resource on the order and its implementation.¹⁵ The **Environmental Protection Agency (EPA)** is charged with developing and maintaining guidance on the acquisition of environmentally preferable products and services for government-wide use and for designating items containing recovered materials in the Comprehensive Procurement Guideline (CPG).¹⁶ E.O. 13101 requires the **U.S. Department of Agriculture (USDA)** to designate biobased items for government-wide acquisition; this list is projected to be published by the end of FY 2000 via the internet.¹⁷ Coordination of all these officials, groups and agencies will take time so be patient for more refined guidance on implementation of E.O. 13101 to filter down to the program and procurement levels which, of course, play the most vital role in implementation.

Implementation of E.O. 13101

E.O. 13101 directs federal agencies to identify and purchase environmentally preferable products and services which are those that have a reduced effect on human health and the environment when compared to other products and services that serve the same purpose. After the EPA has issued guidance on how to determine what constitutes environmental preferability, E.O. 13101 encourages agencies to immediately test and evaluate the principles and concepts in the guidance by initiating pilot projects on products and services widely used in the federal

government. The EPA guidance and results of the pilot projects will establish a basis for identifying and purchasing environmentally preferable products.

Environmentally Preferable Purchasing (EPP)

The EPA has issued final guidance on **Environmentally Preferable Purchasing (EPP)** as required under E.O. 13101.¹⁸ The final guidance is based on the procurement experience of the executive agencies, and the environmental experience of the EPA and other governmental and non-governmental entities. EPA's five (5) "Guiding Principles" on EPP gives agencies a basis to determine the environmental preferability of a product or service. EPA also has an EPP website with other tools, information on pilot projects and EPP discussions for federal agencies.¹⁹ Summarized very briefly, the Guiding Principles are as follows²⁰:

• Guiding Principle 1: Environment + Price + Performance = Environmentally Preferable Purchasing (EPP)

Environmental considerations should become part of normal purchasing practice, consistent with such factors as product safety, price, performance and availability. The manufacture, use and disposal of certain products have adverse impacts on human health and the environment which cost the government and society in some way or another (*i.e.* cleanup and liability costs, environmental damage, disposal costs etc.). As with price, performance and health and safety, environmental factors should be subject to competition among vendors wanting to do

¹⁵ The Guide is available in PDF format at <http://www.ofce.gov/html/greening.pdf> and contains a thorough section-by-section analysis of E.O. 13101 as well as related resources and links.

¹⁶ The Comprehensive Procurement Guideline is available on-line at <http://www.epa.gov/cpg/>. This site is an excellent self-contained resource for finding specifications and manufacturers and suppliers of recycled content products.

¹⁷ The list will be published on the USDA website at <http://www.usda.gov/>. The proposed categories and criteria for developing the list were published by the USDA in the Federal Register 64 F.R. 44185-01 (Friday, August 13, 1999). The categories included adhesives, inks, alternative fuels, construction materials, solvents, plant based plastics and landscaping products.

¹⁸ EPA's Final Guidance on Environmentally Preferable Purchasing is available on-line at <http://www.epa.gov/opptintr/epp/finalguidance.htm>.

¹⁹ EPA's EPP website is at <http://www.epa.gov/opptintr/epp/>.

²⁰ EPA's guidance is an excellent in-depth tool in determining which products and services are environmentally preferable. The limited space in this Lawyer's View cannot do it justice. Program and procurement officials are strongly urged to go to the source for the larger picture and make use of its practical suggestions.



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business with the federal government. This competition will lead to continuous environmental improvement and increase the availability of environmentally preferable products and services that perform better and cost less.

• Guiding Principle 2: Pollution Prevention

Consideration of environmental preferability should begin early in the acquisition process and be rooted in the ethic of pollution prevention, which strives to eliminate or reduce, up front, potential risks to human health and the environment. A key reason for EPP is to protect the environment by reducing waste and pollution at the source with the result of reducing the overall cost to the government and the public. Environmental preferability does not mean substituting a “green” product for another one but rather questioning whether a function actually needs to be performed and if so, how it can best be performed to minimize environmental impacts.

• Guiding Principle 3: Life Cycle Perspective and Multiple Attributes

A product or service’s environmental preferability is a function of multiple attributes from a life cycle perspective. Federal agencies should try to purchase products and services with as few negative environmental impacts in as many life cycle stages²¹ as possible. Environmental preferability reflects consideration of attributes such as increased energy efficiency, reduced toxicity, or reduced impacts on fragile ecosystems. Life cycle assessment can help agencies ensure that the product or service they purchase does not create new problems for some other aspect of the environment by identifying other potential negative impacts that should be addressed.

• Guiding Principle 4: Comparison of Environmental Impacts

Determining environmental preferability might involve comparing environmental impacts and agencies should consider the reversibility and geographic scale of the impacts, the degree of difference among competing products and services and the overriding importance of protecting human health.

• Guiding Principle 5: Environmental Performance Information

Comprehensive, accurate, and meaningful information about the environmental performance of products and services is necessary in order to determine environmental preferability. Public disclosure of environmental performance will foster competition and ensure its accuracy and credibility

EPA’s Comprehensive Procurement Guideline

The acquisition of products containing recycled materials is in keeping with Guiding Principle 2: Pollution Prevention. Section 6002 of the RCRA requires the EPA to designate products that can be made with recycled materials and to recommend practices for agencies for buying those products. The EPA designates recycled content products in the **Comprehensive Procurement Guideline (CPG)**. E.O. 13101 reinforces the RCRA’s buy-recycled requirements and has expedited the process of designating items in the CPG. Items listed in the CPG are not necessarily Environmentally Preferable Products as defined by E.O. 13101, however. CPG items are designated based solely on recycled content while the criteria for EPP include multiple attributes (see EPP above). Earlier this year, EPA expanded the CPG by adding 18 new items, bringing the total to 54 recycled content products.²² The CPG designates items in the following product categories: paper and paper products, vehicular products, construction

²¹The life cycle stages of a typical product are product design, pre-manufacture/raw material extraction, manufacture, packaging and distribution, use/reuse and maintenance, and finally waste management.

²²CPG III was published in 65 FR 3082 (Jan. 19, 2000). For more background on CPG and a complete list of all CPG and RMAN citations go to <http://www.epa.gov/epaoswer/non-hw/procure/pdf/cpgfs-00.pdf>.



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products, transportation products, park and recreation products, landscaping products, non-paper office products, and miscellaneous products.²³ EPA **Recovered Materials Advisory Notices (RMANs)** supplement the CPG and contain recommended minimum recovered and post-consumer material content standards for CPG Items and identifies agency, ASTM²⁴ or other specifications that can be used when buying recycled content products.²⁵ RMANs also provide purchasing recommendations and guidance for finding manufacturers and suppliers of CPG items and are updated on a regular basis to reflect current market conditions. Once an item is designated in the CPG, agencies must revise their specifications to require purchase of that item with the highest level of recovered material content level practicable.²⁶ An agency is required to purchase compliant EPA designated products if the agency spends more than \$10,000 a year on that item.²⁷ The agency may purchase items covered by the CPG that do not contain recycled materials only if the agency determines that the cost is unreasonable, that

inadequate competition exists, items are not available within a reasonable period of time or that items do not meet reasonable performance specifications; written justification is required for non-compliant procurements.²⁸

Agency Level Implementation

Implementation of E.O. 13101 on the agency level is carried out by the development of **Affirmative Procurement Programs (APPs)**²⁹ within each executive agency. APPs are written statements as to how the agency plans to preferentially procure environmentally preferable, biobased and EPA designated goods and services. APPs may make use of preferences and set-asides to favor the purchase of such products and services. These plans must meet the requirements of Section 6002 of the RCRA and E.O. 13101 and contain: 1) a demonstrated preference for procuring recycled products; 2) a promotion and education program to get the word out to the program and procurement officials; 3) procedures for obtaining estimates and certifications of recycled content and other environmental attributes and for verifying those certifications; and 4) annual review and monitoring of the programs effectiveness.³⁰ For purchases of EPA-designated guideline items above the micropurchase threshold, E.O. 13101 mandates that each agency's APP require 100% of the purchases to meet or exceed the EPA guideline. Otherwise, written justification must be provided stating that a product is not available competitively within a reasonable time frame, does not meet appropriate performance standards, or is only available at an unreasonable time.³¹ The requirement to purchase

²³The complete CPG list of products is available on-line at <http://www.epa.gov/epaoswer/non-hw/procure/products.htm>.

²⁴The American Society for Testing and Materials (ASTM) is a member of the American National Standards Institute (ANSI) which publish standards on a wide variety of products. Whenever feasible and consistent with federal law, federal agencies are to rely on voluntary standards pursuant to OMB Circular A-119 and section 12(d) of the National Technology Transfer and Advancement Act of 1995 (P.L. 104-113, Mar. 7, 1996, 110 Stat.775). ASTM has standards for both testing methods and design and has developed performance specification standards for various products including paint, paving materials, paper, roofing, packaging, tires and food. ASTM's specifications are referenced in the CPG and RMANs as appropriate.

²⁵RMAN recommendations are guidance and therefore are not codified in the Code of Federal Regulations.

For a complete list of Federal Register citations for all RMANs issued as of April 2000, go to <http://www.epa.gov/epaoswer/non-hw/procure/pdf/cpgfs-00.pdf>.

²⁶FAR §23.403 (2000).

²⁷RCRA, 42 U.S.C. §6901, et. seq. §6002 (2000); FAR §23.404 (2000).

²⁸E.O. 13101 §502(c).

²⁹ The Department of Commerce APP is under development.

³⁰An outline of a model APP is provided in Appendix G (page 124) of the Task Force's "Guide to Implementing E.O. 13101" available in PDF format at <http://www.ofee.gov/html/greening.pdf>.

³¹ The key word is "reasonable" for these exceptions to purchasing items that meet the EPA guidelines; agencies cannot require that a product be delivered in a shorter period of time



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EPA-designated items still applies to purchases under the micropurchase threshold but no written justification is required if one of the exceptions applies.

How to Find & Purchase Recycled, Recyclable, Environmentally Preferable & Biobased Products

Agencies should begin with existing standards, definitions and percentages whenever possible, especially those recommended by EPA or established by E.O. 13101 (*i.e.* content standards for paper). For recycled content products listed in the CPG, use EPA's recommended minimum content levels (found in the accompanying RMANs); the CPG website also lists manufacturers and suppliers of qualifying products.³² Regardless of which specifications you use, each agency should regularly review and revise them to keep pace with the CPG and EPA guidance. GSA's Federal Supply Service and the JWOD program offer green products and services for purchase.³³ To determine if a product or service is environmentally preferable, use the EPP guiding principles developed by EPA. For biobased products, use the USDA criteria and informational listing of products once it is available; until then use the catalog of biobased products put out by the Alternative Agricultural Research & Commercialization (AARC) Corporation, a wholly-owned government corporation of the

USDA.³⁴ Establish open communication with end users and vendors to determine aggressive but achievable standards for recycled content. Users and vendors can also point to specifications or solicitation provisions that could present a barrier to purchasing recycled content or environmentally preferable products. Emphasize performance specifications because the critical factor for the user is how will the product perform, not what is it made of. Then make post-consumer content, amount of waste prevented, performance-based measures and other EPP principles significant factors in award decisions.

So Think Green and Remember...

Environmental considerations are relevant at every stage of the procurement process. Even at the very beginning when determining agency needs, remember the "Green Hierarchy": "Reduce, Reuse, Recycle". Can the need be filled from excess? By using what the government already owns, all three goals have been met: one less widget (and its accompanying packaging) has been produced and an existing widget is being reused which is the most efficient form of recycling! Can the product, service or process be replaced with a better, more efficient one? Is it really necessary (*i.e.* does it add value)? At the acquisition planning stage, remember there's no need to reinvent the wheel; GSA has already done some of the work for you. If you can't find what you need at GSA, EPA can be a valuable resource in drafting specifications that address environmental concerns. Make environmental considerations an important part of the evaluation criteria, just as you would performance and price. And in carrying out the acquisition, consider saving some trees by using the internet to issue solicitations, accept offers and correspond with offerors via e-mail.³⁵

than is really needed or require a higher level of performance than needed to avoid the affirmative procurement requirements.

³²CPG Products and minimum recycled content levels available at <http://www.epa.gov/epaoswer/non-hw/procure/products.htm>.

³³A brief overview of environmental product and services offered by GSA and background on Planet GSA (including related links) are at <http://www.fss.gsa.gov/environ/>. GSA has published an "Environmental Products and Services Guide" available at <http://www.fss.gsa.gov/environ/pdf/EPSP1999.pdf> which outlines in detail the products and services available and how to order them. JWOD's products are on-line at <http://www.jwod.com/> in the "Environmentally Friendly Products Store."

³⁴ AARC's catalog is available at <http://www.usda.gov/agency/aarc/aarcrbk.html>.

³⁵No trees were harmed in the production or distribution of this Lawyer's View.



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Resources:

Offering Green Products & Services:

Javits-Wagner- O'Day Act (JWOD) Environmentally Friendly Products Store - <http://www.jwod.com/>. The JWOD Program now carries many recycled products.

GSA Federal Supply Service, "Environmental Products & Services Guide" - <http://www.fss.gsa.gov/environ/pdf/EPSPG1999.pdf>.

Outlines in detail the environmental products and services available from GSA and how to order them. Also <http://www.fss.gsa.gov/environ/recycled-prod.cfm> which explains how to find green products and order them on-line.

The Alternative Agricultural Research & Commercialization (AARC) Corporation - <http://www.usda.gov/agency/aarc/aarcrbk.html>. A source book of biobased products.

U.S.D.A. - <http://www.usda.gov/>. The USDA's list of biobased products is expected to be completed and published on the USDA website by the end of Fiscal Year 2000.

Tools, Resources, Standards and Specifications for Environmentally Preferable Products and Services & Recycled & Biobased Products:

EPA's Environmentally Preferable Purchasing, Greening Uncle Sam Purchasing Tool Suite - <http://www.epa.gov/opptintr/epp/>. Contains tools (i.e. databases of environmental standards and contract language, under the "how to" section), information on agency pilot projects, success stories, discussion and related links.

EPA's Comprehensive Procurement Guideline - <http://www.epa.gov/cpg/>. Designates recycled content products and gives recommended minimum standards, specifications and manufacturers of compliant items.

The PlanetGSA Program - <http://www.gsa.gov/planetgsa/>. Tools to build, buy,

drive and manage green as well as related news, resources and contacts.

NIST's Building for Environmental and Economic Sustainability (BEES) Software, available for downloading at no charge at <http://www.bfrel.nist.gov/oae/software/bees.html>. BEES is Windows-based decision support software and a useful tool in selecting cost-efficient green building products

Green Seal - <http://www.greenseal.org/>. Contains standards for recycled products.

American Forest & Paper Association - <http://www.afandpa.org/recycling/recycling.html>. Contains information and resources on wood and paper recycling.

The American Plastics Council - <http://sourcebook.plasticsresource.com/>. A Recycled Plastic Products Source Book.

The Remanufacturing Industries Council - <http://www.rici.org/>. Contains information on remanufactured products.

The U.S. Green Building Council (USGBC) - <http://www.usgbc.org/programs/index.htm>. Provides information and resources on green building.

Training:

EPA's Green Tips for Buying with a Government Credit Card - <http://www.epa.gov/opptintr/epp/creditcard.htm>.

The Federal Acquisition Institute - <http://www.gsa.gov/staff/v/training.htm>. E.O. 13101 training is coming soon to FAI's On-line University.

E.O. 13101 & Environmental Issues In General:

The White Task Force on Recycling's "Guide to Implementing E.O. 13101" - <http://www.ofee.gov/html/greening.pdf>.

EPA's Final Guidance on Environmentally Preferable Purchasing - <http://www.epa.gov/opptintr/epp/finalguidance.htm>.



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The President's Council on Environmental Quality -
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