

## **Air Force Affirmative Procurement Program**

Maj Ed LaBenne  
SAFIAQCO

Executive Order 13101, *Greening the Government Through Waste Prevention, Recycling* and the *Federal Acquisition Regulation* (FAR) requires Federal agencies to purchase environmentally preferable products where possible. This program, known as Affirmative Procurement, applies to all CONUS installations and to products purchased in the United States for shipment overseas. The US Environmental Protection Agency (EPA) lists the applicable products in the Comprehensive Procurement Guidelines (CPG) at their web site, [www.epa.gov](http://www.epa.gov). The products listed under the EPA's CPG must meet the requirements of the Recycled Materials Advisory Notices (RMAN) for a percentage of recycled content to be considered an environmentally preferable product.

To support the Air Force Affirmative Procurement Program, a team approach is required. Air Force Instruction (AFI) 32-7080, *Compliance Assurance and Pollution Prevention*, (in coordination) places responsibility for the Affirmative Procurement Program on the Environment Safety Occupational Health (ESOH)/Environmental Protection Committee (EPC) at all levels in the Air Force. The ESOH/EPC at each MAJCOM and installation determines the best team makeup to develop and implement a viable Affirmative Procurement Program.

The two key organizations in implementing and monitoring the Affirmative Procurement Program are Civil Engineering and Contracting. The Civil Engineering Environmental office provides education and training, in conjunction with Contracting, to all base personnel on affirmative procurement and on CPG and RMAN information. Training to personnel preparing solicitation packages must include required affirmative procurement submittals. The training must also address the need to update all purchase specifications to include affirmative procurement requirements. Engineering Technical Letter (ETL) 00-1, *EPA Guideline Items in Construction and Other Civil Engineering Specifications*, requires affirmative procurement be included in all Air Force Civil Engineering specifications for construction and service contracts that call for the purchase of CPG listed items. The Government-wide Purchase Card Agency/Organization Program Coordinator will ensure APP requirements are incorporated into purchase card training program.

Affirmative Procurement Programs are legally required by the Resource Conservation Recovery Act (RCRA) to consist of four elements: (1) a preference program, which includes policy, planning, and revisions to purchasing specifications; (2) a promotion program, which furthers affirmative procurement through awareness, education, and public relations; (3) a method of obtaining and verifying vendor certifications that products meet the specified recycled-content requirements, by inserting appropriate FAR clauses into each contract; and (4) annual monitoring and review, to evaluate the program's effectiveness and its currency with EPA's changing requirements. For details on these affirmative procurement requirements and suggested implementation strategies, please consult the Air Force's *Guide to Green Purchasing* at <http://www.afcee.brooks.af.mil/ea/ap/ap.htm>.

The ESOH/EPC team should begin by developing an affirmative procurement plan. The plan describes the team's strategy for executing the program. A specific format is not prescribed, but example plans are available at <http://www.afcee.brooks.af.mil/eq/ap/SamplePlans/sample.htm>. The affirmative procurement plan must address each of the four required program elements outlined above and state how they will be accomplished. The team should use the plan to manage the program as well as communicate program requirements to organizations that purchase

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CPG items. Installations without a program in place are at risk of receiving a Notice of Violation under RCRA 6002 by the EPA.

When applicable, solicitation packages must specify CPG items and contain information in order to ensure the Contracting Officer inserts the proper FAR clauses into the contract. The actual data (certification on products to ensure they meet CPG requirements) collected from vendors is not reported to higher headquarters, but is used locally to verify that affirmative procurement requirements are being met.

Teamwork is the key to making this program successful across the Air Force. Although AR 32-7080 is a Civil Engineering AFI, all base activities are required to use CPG items when possible or justify using non-CPG items. Contracting officers comply with the Affirmative Procurement Program and E013101. To ensure a successful Air Force Affirmative Procurement Program we must work together as a team.

If you or members of your staff have any questions, please contact Major Ed LaBenne, SAF/AQCO, DSN 425-7032, e-mail: [edgadabenne@pentagon.af.mil](mailto:edgadabenne@pentagon.af.mil).

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