Tips for Paper Product Vendors:
How You Can Help Cities Comply with SB 1383

Green Purchasing Roundtable
March 2, 2022
Agenda

- Welcome
- **Presentation:** Paper Purchase Requirements and Resources
- Questions & Answers
- **Vendor Feedback:** Template Questions Cities May Ask
- **City Perspectives:** City of Alameda, maybe others?
- Close
- More Questions & Answers (optional)
Housekeeping

- We will record the main session to share with the public on our website [https://www.acsustain.org/what/purchasing/roundtable.htm](https://www.acsustain.org/what/purchasing/roundtable.htm)
- Please do not “chat” to all, except for questions & tech needs.
- **Questions – use chat.** We will respond during Q&A, not during presentation
  - Anonymous questions can be asked via a survey after the main presentation
- **Tech needs – use chat.**
Poll #1 – All Attendees

- What category of paper products do you sell? (Multiple choice)
  - Janitorial
  - Office supply
  - Print services
  - Other paper products
  - None

- How familiar are you with the requirements of SB 1383?
  - First time hearing about it
  - Have heard of it, but not sure what my role is
  - Already supporting cities with implementing regulations
SB 1383 Paper Procurement Requirements

What Vendors Need to Know

Green Purchasing Roundtable
March 2, 2022

Alameda County SUSTAINABILITY
Local Action, Global Impact.
Disclaimer

What this is…

- Sharing our knowledge and understanding to help you.

What this is not…

- Legal advice. Consult your legal counsel with questions.

*We make no warranties that the information shared will satisfy CalRecycle enforcement and we are not responsible for the compliance of other jurisdictions or parties.*
Background: SB 1383

- Short-Lived Climate Pollutants Act, passed in 2016
- Aims to reduce methane and other climate pollutants by mandating:
  - Organic waste be diverted from landfills, and
  - Surplus edible food be recovered for human consumption
- CalRecycle given authority to promulgate regulations to meet these objectives
- Regulations took effect January 1, 2022

More Information: [https://www.calrecycle.ca.gov/organics/slc](https://www.calrecycle.ca.gov/organics/slc)
How Paper Fits In

- Generators (residents & businesses) are required to recycle paper.
- With more paper being recycled, there is a need to support development of end markets.
- Regulations require jurisdictions to purchase post-consumer recycled content paper to help build these end-markets for recycled paper.

Other Benefits:
- Reduce deforestation
- Lower GHG emission of producing paper
- Meet city policy goals for environmental purchasing or climate action

More Information: [https://www.calrecycle.ca.gov/organics/slcp](https://www.calrecycle.ca.gov/organics/slcp)
Key Terms

- **Jurisdictions**: Cities, counties or sanitary districts providing solid waste collection services
  - These are the only entities the regulations apply to

- **Post-consumer**: Consisting of or incorporating material discarded by end users rather than generated during a manufacturing process
  - This distinction is important to supporting development of end-markets for paper recycled at the curbside by generators

1 Source: Oxford Dictionary
Paper Purchasing* Requirements for Cities

1. Purchase paper products with a minimum of 30% post-consumer recycled content
2. Ensure that the paper purchased is recyclable
3. Maintain records certifying compliance

*Definition from SB 1383 regulations: “Paper Purchase” means all purchases by a jurisdiction of items in the following categories: (A) Paper products. (B) Printing and writing papers.
Recycled Content

Purchase papers with a minimum of 30% post-consumer recycled content (PCR)

- Reinforces existing public contract code\(^1\)
- Allows for exceptions for fitness, quality, or higher cost
  - Cities must maintain justifications for non-compliant purchases in implementation record
- Applies to all paper purchases, including printed material distributed by cities

\(^1\)Public Contract Code [Section 22150-22154](#)

Vendor Tips

- Identify products with 30% PCR products in your catalogs, invoices, or other documents
- Seek new suppliers who can provide cost-competitive compliant products
Recyclability

Purchase papers that are eligible to be labeled with an “unqualified recyclable label”

- Means recycling facilities are available to 60% of consumers
- Law requires vendors to certification of recyclability in writing
- Per CalRecycle, will not be enforced for products that cannot be recycled, like janitorial papers

Why Recyclability?
- Purpose is to avoid purchasing products that end up being landfilled anyway, such as multi-material products

16 Code of Federal Regulations Section 260.12
Recordkeeping

Maintain all documents supporting compliance

- Proof of purchase of all paper products by volume and type
- Certifications and verification for:
  - Post-consumer recycled content
  - Recyclability
- All other documentation supporting compliance
  - Such as the reason for purchase of non-compliant products

Vendor Tips

- Include information on PCR amounts and recyclability on invoices, usage reports, or product certification form.
- Provide records within 60 days
- Provide documentation to help jurisdictions justify non-compliant purchases, when quality or cost is not equal
Recordkeeping Details

For all paper products purchased, show:

Recycled Content
• Vendor can certify in writing, e.g., usage report or product certification form
• Or maintain verification from a product label, catalog, invoice, manufacturer or vendor website, etc.

Recyclability
• Vendor must certify in writing that products are eligible to be labeled with unqualified recyclable label

Provide documentation that helps cities to justify purchases that are not compliant
Reporting Format Examples

Example Usage Report Format From Alameda County

Key categories shall be defined as:

a) Purchase date
b) Purchase Order Number
c) Department Name
d) Manufacturer item number
e) Item description (e.g. brand, size, color, etc.)
f) Unit of measure (e.g., ream, carton);
g) Number of individual pieces per unit;
h) Units purchased (i.e., order quantity);
i) Shipped quantity (if not same as order quantity);
j) Unit price (i.e., charge to customer); and
k) Total order cost.
l) Percentage of post-consumer content
m) Recyclable? (y/n)

Template based on Alameda County contract documents. Fields in blue are the minimum required if usage reports are used for city recordkeeping purposes.

https://www.calrecycle.ca.gov/organics/slcp/procurement/RecycledPaper
Preparing for Q & A
Google Form Survey – Vendor Q & A
(Link Will be in Chat)

- What questions do you have about SB 1383 requirements and your role in helping cities comply?
- What are your chief concerns or difficulties anticipated in helping cities with their compliance?
- Do you feel you are able to access compliant products in the marketplace?
  - If possible, share the products you’re having trouble finding.
Resources
Paper Product Market Assessment

- Produced by Responsible Purchasing Network (RPN)
- Includes verified recycled content percentages for 10 product categories
- Vendors can use this as a starting place for developing an SB 1383 compliant product list
- Vendors are encouraged to work with your preferred suppliers to offer more options for cities

Disclaimer: Produced by RPN. No warranties are made to accuracy of information at any given time. Not all vendors or products are represented, and no preference is implied for any vendor or product listed herein. Original research based on national firms, not local suppliers.
Factsheet

- Simplified overview of requirements
- Information on how vendors can support city implementation
- Q & A

Will be posted to www.acsustain.org
## CalRecycle Reporting Tool

**Implementation Record Requirements**

<table>
<thead>
<tr>
<th>Description or Data</th>
<th>File Location</th>
<th>Regulatory References</th>
</tr>
</thead>
<tbody>
<tr>
<td>Copies of invoices, receipts or other proof of purchase that describe the procurement of paper products by volume and type for all paper purchases</td>
<td></td>
<td>14 CCR Section 18995 2(f)(1)</td>
</tr>
<tr>
<td>Copies of all certifications or other verification required under 14 CCR Section 18993.3</td>
<td></td>
<td>14 CCR Section 18993.4(a)</td>
</tr>
</tbody>
</table>

[https://www.calrecycle.ca.gov/organics/slcp/recordkeeping/implementationrecord](https://www.calrecycle.ca.gov/organics/slcp/recordkeeping/implementationrecord)
Questions Cities Might Ask
Google Form Survey #2  
(Link Will be in Chat)

- Yes, we can answer this
- No, we cannot answer
- Not sure
- Would need help to develop this

Add comments or suggestions – what would you like to be asked?
Questions Cities May Ask
When Soliciting Bids from Paper Vendors

- Do you have a **reporting template** to provide product tracking information required by SB 1383? Can you provide this report upon request within 10 days?
- Are you **already providing** SB 1383 compliant tracking information for other buyers?
- Do you have an indication in your **catalog** for SB 1383 compliant products? What about non-compliant products?
- Can you provide a **separate list** of SB 1383 compliant and non-compliant products you have available?
- Please describe how buyers find SB 1383 compliant products while purchasing?
- **If compliant products are not available** or are more costly, are you able to document this to help with record keeping requirements?
- If you don't currently carry compliant products, but they are available in the marketplace, are you **willing to source from new suppliers**?
- Can you **compare** non-compliant and compliant products by price (e.g., conduct a market assessment)?
- Can you provide certification in writing that paper products sold are **recyclable** in local recycling programs?
Market Basket of Compliant Products
Other City Perspectives?
Thank You!

www.acsustain.org

https://www.calrecycle.ca.gov/organics/slcp/procurement/RecycledPaper
Post-Event Q & A (Optional)