Composite Product Reporting Policy

Definition: A composite product is a product that is made of more than one type of material. This pertains to the product only, not the packaging.

1. To include **composite products in the annual report**, an agency should use the following guidelines:

    a. The entire purchase cost can be documented as SABRC "Reportable Dollars" if **more than half** of the product as a whole (by weight or volume) is made from a single material in a SABRC category. If that material also meets the minimum post-consumer recycled content, then the entire cost can be reported as SABRC "Compliant Dollars."
    b. A percentage of the purchase cost can be documented as SABRC "Reportable Dollars." For example, if 25% of the product is glass, you may report 25% of the cost in the Glass category (and 25% of the cost as SABRC "Compliant Dollars," in the Glass category, IF it contains a minimum of 25% PC glass).

    Note: A State agency can only "count" composite products in **one reportable category** pursuant to PCC 12203 (c). In a case where the percentage of the composite product is known, for a SABRC material type, **then the product can be reported in the *one* corresponding SABRC category**. In other words, you cannot claim a product, or its cost, in two categories. If an item contains more than one material, the agency should decide which category it will report the item in.

    c. To make it easier, per statute, the certification form can be waived if the recycled content can be verified by other written means (i.e. in a product or manufacturer's catalog, website etc.). In this case, agency staff can just record the SABRC reportable purchases and the post-consumer recycled content for your SABRC report. In a bid process, it is the agency's prerogative to ask the bidder to provide written verification of post-consumer recycled content by using existing product descriptions/specifications, etc.

2. If an agency **does not include composite products**, it should use the following guidelines:

    a. When completing the Post-Consumer Recycled Content Certification Form 74 (PCRC Form 74), the vendor should follow the instructions on PCRC Form 74 for products that may fall outside one of the 16 product categories: "*If the product does not belong in any of the product categories, enter "N/A." Common "N/A" products include wood products, natural textiles, aggregate, concrete, and items such as, TVs or software on a disk or CD.*"

        i. Another option is to allow the vendor/contractor to say "unknown" when the material content is unknown or there are "multiple materials" that can't be identified accurately. By using "N/A" or "unknown" this explains that the SABRC category or the recycled content information is not found.

    b. It is an agency's responsibility, during the bid process, to let vendors/contractors know what is required. For example, you may not want the vendor or contractor to fill out the form with products that do not fall into any of the SABRC categories. The form could be used for SABRC reportable items only.

i. In AB 661 statute, preference should be given to post-consumer recycled content products when the fitness and quality are equal, the recycled products are no more than 10% greater of the total cost, and one of the following applies: the agencies uses leveraged procurement agreement through which both recycled and nonrecycled products are available; the agency is awarding contracts using Section 14838.5 of Government Code and received offers for both recycled and nonrecycled products; the agency awards a contract without soliciting multiple offers based that the price is fair and reasonable. In a bid process, it is the agency's responsibility to require the certification form and to explain to vendors how the agency wants it completed. However, it is not intended for agencies to exclude bidders who cannot offer post-consumer recycled content products, or who do not know the content of the products/materials they offer.