

# NSW Recycled content reporting guide

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## Procurement dates

**How do I determine which financial year to report goods in (for Requirement 2)?**

The goods must be reported in the financial year that matches the invoice date of purchase, regardless of when the procurement process began or the goods were delivered.

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## Reporting and data collection

**Is reporting required for each item within a contract, or can it be summarised at the contract/category level?**

For Requirement 2, reporting must be completed for each Reportable Product included in any Eligible Purchase. High-level summaries at the contract or category level are not sufficient. The specific data requirements are outlined in Appendix B – Recycled Content Reporting Template.

**How do I handle reporting if my procurement includes multiple items, and only some are reportable?**

Under Requirement 2, you only need to collect and report on recycled content data for the Reportable Products listed in Table 1 of the Guide. If an Eligible Purchase includes a mix of reportable and non-reportable goods or services, data only needs to be reported for the reportable items.

**If I make several small purchases using a Whole of Government head contract that total over \$100,000 in a single invoice, does that trigger reporting?**

Yes. If you make a direct purchase through a Whole of Government head contract or a catalogue, and the single invoice total is over \$100,000 and includes Reportable Products, then Requirement 2 applies, and you must report recycled content data for those products.

If you do not purchase any Reportable Products, or if you purchase Reportable Products that do not contain recycled content, then you do not need to report under Requirement 2.

**Do agencies need to verify and validate recycled content claims from suppliers?**

No. Agencies do not need to verify recycled content claims are correct from suppliers, but should ask for independently-verified claims in relation to recycled content. The Data Verification heading of the Guide has additional information.

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### What should I do if suppliers cannot provide recycled content data, or verification is incomplete or missing?

If the supplier cannot provide recycled content data or verification, this may affect the evaluation of that supplier's tender (dependent on your tender requirements).

If data availability and verification become a problem during the contractual period, record missing information in the reporting template and document the reason for the gap in your internal records to support compliance. Continue to preference recycled content in your procurement of goods and encourage suppliers to improve the data availability over time.

### How should reused items be reported?

The Excel reporting template has a dedicated tab to report on reused items.

### Can agencies submit data in formats other than the Excel template?

No, agencies must use the Excel template provided. This ensures that the data can be accurately input into the Sustainable Government Data Platform (SGDP).

### I am purchasing a Reportable Product through a Whole of Government head contract, and the total value exceeds \$100,000, but the Reportable Product is only a small proportion of the order. Do I still need to report?

If the reportable component represents a minor proportion of the total purchase, reporting may not be required. Use discretion and consider the significance of the reportable item within the overall procurement.

### I am purchasing a combination of Reportable Products within one procurement. Which one do I report on?

You must report on all the Reportable Products in the procurement.

### I am purchasing a product under one of the Whole of Government contracts in Table 2, but the product is not listed as a Reportable Product in Table 1. Do I still need to report?

You will need to preference (Requirement 1) but will not need to report (Requirement 2) on the product.

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## Compliance and exemptions

### Do the reporting requirements apply to both competitive and direct procurements?

Yes. The definition of eligible procurements includes both competitive and direct procurements, provided that the procurement meets the criteria in Requirement 1.

**If my agency did not release any Eligible Tenders or make any Eligible Purchases, do we still need to submit the Annual Statement of Compliance?**

Yes. Even if no eligible procurements occurred, your agency must still submit the Annual Statement of Compliance. Simply tick the box indicating no eligible activity. The statement must be signed by an executive director or equivalent, with the authority to approve reporting on behalf of the entire agency.

**Are there penalties for non-compliance with Action 22 of the NZGO Policy?**

While the Guide does not specify penalties, compliance with Action 22 is mandatory under the NZGO Policy.

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## Other

**Is it mandatory to include a Supplier Recycled Content Plan in a tender?**

No. The Supplier Recycled Content Plan (SRCP) is a recommended tool to help include recycled content preferencing during the tender process. While it is not mandatory, the SRCP may assist agencies in gathering information needed to complete the Annual Statement of Compliance, assess suppliers' capability to meet recycled content preferencing, and embed these commitments into contracts. The use of the SRCP is considered good practice for Eligible Tenders under Action 22.

**How do we apply Action 22 requirements to standing offer agreements (with no fixed value)?**

For standing offer agreements (without a fixed contract value), agencies must use the estimated total value of the procurement to determine if the relevant monetary thresholds are met for both Requirements 1 and 2.

**Is it mandatory to include an evaluation weighting to assess Action 22 in a procurement?**

No, it is not mandatory; including an evaluation weighting is optional.