

General Services Administration  
Washington, DC 20405

ADM 2800.12B, Change 197  
April 16, 2025

## GSA ORDER

Subject: General Services Administration Acquisition Manual; GSAM Case 2025-G506, Removal of Sustainable Acquisition

1. Purpose. This order transmits a revision to the General Services Administration Acquisition Manual (GSAM) to remove references to sustainability and climate change throughout the GSAM in accordance with Executive Order (E.O.) 14154, Unleashing American Energy.
2. Background. The GSAM will no longer provide supplemental guidance for certain sustainable-related topic areas, in accordance with E.O. 14154, Unleashing American Energy, which revoked various sustainable and climate-related E.O.s including E.O.s 13990, 14008, 14030, and 14057.
3. Effective date. April 16, 2025
4. Explanation of changes. This amendment includes non-regulatory GSAM changes. For full text changes of the amendment see Attachment A, GSAM Text Line-In/Line-Out.

In summary, these non-regulatory changes include:

- Removing references to sustainability-related roles within the acquisition team.
  - Removing requirements to include sustainability as part of acquisition planning, market research, or when describing agency needs.
  - Removing sustainability acquisition policy, guidance, and requirements in GSAM 523.
  - Removing non-regulatory sustainable requirements for lease acquisitions.
5. Point of contact. For clarification of content, contact Adina Torberntsson, GSA Acquisition Policy Division, at [gsarpolicy@gsa.gov](mailto:gsarpolicy@gsa.gov).

Signed by:  
  
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Jeffrey Koses  
Senior Procurement Executive  
Office of Acquisition Policy  
Office of Government-wide Policy

**ATTACHMENT A**  
**GSAM Case 2025-G506**  
**GSAM Text, Line-In/Line-Out**

**GSAM Baseline: Change 196 effective 02/14/2025**

- Additions to baseline made by rule are indicated by **[bold text in brackets]**
- Deletions to baseline made by rule are indicated by ~~strikethroughs~~
- Five asterisks ( \* \* \* \* \* ) indicate that there are no revisions between the preceding and following sections
- Three asterisks ( \* \* \* ) indicate that there are no revisions between the material shown within a subsection

**Part 501 - General Services Administration Acquisition Regulation System**

**Subpart 501.6 - Career Development, Contracting Authority, and Responsibilities**

**501.601 General.**

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*(b) Contracting Officials.*

(1) The Head of the Contracting Activity (HCA) is ultimately responsible for managing all aspects of their respective contracting activity. Additional roles are identified throughout the FAR and GSAM to support HCAs in their responsibilities, including the Contracting Director, Contracting Activity Advocate for Competition, and Acquisition Career Navigator (ACN), and Acquisition Subject Matter Experts (A-SMEs) in key acquisition areas such as small business, labor, ~~sustainability~~ and cybersecurity. The HCA may also designate a Contracting Executive by making the appointment in writing and transmitting a copy to the Senior Procurement Executive. Additional resources for HCAs, Contracting Executives, Contracting Directors, Advocates for and A-SMEs can be found on the Acquisition Contacts and Offices page on the GSA Acquisition Portal at <https://insite.gsagov/acquisitionportal>.

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(7) \* \* \*

(i) \* \* \*

(ii) Key acquisition areas include small business, labor, ~~sustainability~~, and cybersecurity. HCAs may appoint A-SMEs in other areas as necessary.

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## Part 502- Definitions of Words and Terms

### Subpart 502.1 - Definitions

#### 502.101 Definitions.

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["Acquisition Subject Matter Expert (A-SME)" means a member of the acquisition workforce designated in writing by the Head of the Contracting Activity who is knowledgeable in one or more key acquisition areas, including small business, labor, sustainability, and cybersecurity, as described in 501.601(b)(7). The A-SME should have expertise demonstrated by years of experience focused on the subject matter, a credential or other specialized training. A-SMEs are identified on the GSA Acquisition Portal at <https://insite.gsa.gov/acquisitionportal>.

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## Part 504—Administrative Matters

### Subpart 504.71 - Acquisition Reviews

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#### 504.7104 Acquisitions and contract actions requiring SPE review and approval.

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(d) *Participants*. Acquisition reviews involving the SPE are to include key members of the acquisition team as well as the following participants:

- (1) SPE or authorized designee;
- (2) Head of the contracting activity or authorized designee;
- (3) Office of Small and Disadvantaged Business Utilization; and

~~[(4) Office of the Chief Sustainability Officer, Office of Federal High Performance Green Buildings, or authorized sustainability designee]~~

~~(5) [(4)]~~ Other key stakeholders (e.g., ~~GSA Office of Information Technology~~ **[Office of GSA IT]** for GSA-funded technology acquisitions).

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## Part 507—Acquisition Planning

### Subpart 507.1 Acquisition Plans

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#### 507.103 Agency-head responsibilities.

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~~(c) *Sustainability Strategies.* Strategies to either mitigate or adapt to climate change can be explored during acquisition planning and should be clearly documented within the acquisition plan (see 507.105). Some requirements may present more environmental opportunities than others. The Sustainable Facilities tool, available at [sftool.gov](http://sftool.gov) may be used to identify sustainable attributes (products that are energy efficient, water efficient, or made from recycled materials).~~

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#### 507.104 General procedures.

(a) The planner shall:

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~~(10) Coordinate, as necessary, with any designated sustainability point of contact for the requirement (see 504.7104).~~

~~(11) [(10)]~~ Follow sustainability policies and procedures specified in part 523 throughout the procurement.

~~(12)~~**[11]** Coordinate with the contracting officer to ensure all INFORM components (see INFORM Guide) are integrated into the acquisition planning process. The acquisition plan must include the time necessary for orientation of acquisition stakeholders and potential evaluators to INFORM procedures and timeline commitments.

~~(13)~~**[12]** Coordinate with the designated AbilityOne Representative (ABOR), as appropriate. The GSA ABOR team may be contacted at [GSAABOR@gsa.gov](mailto:GSAABOR@gsa.gov). Coordination may be appropriate, but is not limited to, when —

**[(i)]** Adding a product or service to the AbilityOne Procurement List (see FAR subpart 8.7, and subpart 508.7). The planner shall ensure the requirement is clearly defined and sufficient time is included in the acquisition schedule to allow for addition to the AbilityOne Procurement List; (i)

(ii) Providing subcontracting opportunities to AbilityOne nonprofit agencies; and

(iii) Including FAR 52.208-9 in a procurement (see FAR 8.005 and 508.005).

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## **507.105 Contents of written acquisition plans.**

(a) The content prescribed in FAR 7.105 and shall be used in the preparation of written acquisition plans. ~~Except for 507.105(a)(1), w~~**[W]**here a particular element described in FAR 7.105 does not apply, the acquisition plan should read “not applicable.” The dollar value, complexity (e.g., commercial versus non-commercial item) and method of acquisition (e.g., full and open competition versus task/delivery order) of the supplies and services to be acquired will affect the scope and breadth of the acquisition plan.

~~(1) Sustainable Acquisition Considerations. Whether it is in the requirements, the statement of work, the method of award, or the contract administration strategy, most acquisitions present opportunities to consider the impact on the environment. For all acquisitions that require a written acquisition plan, environmental impact shall be considered and documented in the acquisition plan (see FAR 7.105(b)(17)). When addressing FAR 7.105(b)(17) in the acquisition plan, the contracting officer should address the following:~~

~~(i) Statement of Work. When conducting acquisition planning, the contracting officer is encouraged to strategize with the program manager to consider the most environmentally preferable solutions for the Government. For example, this could include buying items with less packaging, greater recycled content, longer shelf life, lower carbon footprint, improved energy efficiency, less waste, or services that are performed remotely to reduce the federal carbon footprint (see 511.002(a) for additional guidance).~~

~~(ii) Contract Administration. Describe actions during contract administration to promote environmentally preferable solutions. For example, this could include any in-scope efficiencies that are identified after contract award that further reduce the Government’s carbon footprint.~~

~~(2) Contracting officers may not state that the sustainability section of the acquisition plan is “not applicable” without a full explanation as to why the acquisition does not present any sustainable acquisition opportunities.~~

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## Part 508—Federal Supply Schedules

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### 508.405 Ordering procedures for Federal Supply Schedules.

(a) For a D&F for a single award Blanket Purchase Agreement (BPA) with an estimated value exceeding \$100 million, the D&F must be approved by the HCA

(b) COs shall follow the INFORM procedures in 515.370 for all applicable orders and BPAs.

~~(c) Sustainability. When placing orders or establishing BPAs, contracting officers should consider sustainability.~~

~~(1) Sustainability considerations may be accomplished by utilizing the existing sustainable ecolabels in GSA Advantage!® to meet specific environmental program goals, such as ENERGY STAR®.~~

~~(2) The GSA sustainable packaging icon on GSA Advantage!® can be used as part of the best value decision.~~

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## Part 510—Market Research

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### 510.002 Pre-Award Procedures.

~~(a) Market research must be conducted in accordance with 523.104(a)(1).~~

~~(b) Ensure statement of work includes sustainability requirements in accordance with 523.104(a)(2).~~

~~(c)~~**[(a)]** Market research activities related to cyber-supply chain risk management for information technology, GSA-funded acquisitions.

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~~(d)~~**[(b)]** *Market research activities related to cyber-supply chain risk management for non-information technology, GSA-funded acquisitions. The acquisition planning team should:*

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## Part 511—Describing Agency Needs

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### 511.002 Policy.

~~(a) When considering sustainable acquisition for products and services pursuant to FAR 11.002(d)(1), it is the policy of GSA to consider the following:~~

~~(1) *Greenhouse Gas Emissions.* Consider practices and strategies to reduce greenhouse gas emissions such as operational emissions, embodied carbon, transportation and logistics costs.~~

~~(2) *Ecolabels.* Use the Sustainable Facilities Tool (sftool.gov) to identify ecolabels that apply and incorporate them into the requirements~~

~~(3) *Waste, Sourcing, Efficiency, and Content Management.* Consider supporting environmental objectives such as waste reduction, source reduction; increased material, energy, or water efficiency; or maximum practicable recovered material content. This may include considering waste reduction techniques and taking into account reduction in packaging to include shipping packaging when buying supplies (e.g., the purchase of more durable products that last for years, requiring fewer replacements).~~

~~(4) *Services.* For services, consider overall environmental and social opportunities and risks when drafting the requirement package to include any ancillary supplies.]~~

~~(b) FAR 11.002(b) and GSA Order ADM 8000.1D, GSA Metric Program, establish policy for using the metric system in procurements. The GSA Construction Metrication Ombudsman, located in the PBS Office of Acquisition Management, can be found at <http://www.gsa.gov/ombudsman>.~~

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## Part 523—Environment, Energy and Water Efficiency, Renewable Energy Technologies, Occupational Safety, and Drug-Free Workplace

### Subpart 523.1 - Sustainable Acquisition Policy[Reserved]

#### 523.101 General.

~~FAR part 23 requires GSA to purchase sustainable products and services. FAR part 23 requires GSA to purchase sustainable products and services. This subpart outlines the specific steps the contracting officer or designated acquisition team member must take throughout all procurements to comply with this requirement. In accordance with GSAM 523.404, this Subpart contains the GSA affirmative procurement program.~~

## **~~523.102 Definitions.~~**

## **~~523.103 Applicability.~~**

~~This policy applies to contract actions executed by GSA personnel, whether in support of GSA operations or on behalf of another agency.~~

## **~~523.104 Procedures.~~**

### ~~(a) Pre-Award Procedures.~~

~~(1) *Market Research.* Use the Green Procurement Compilation [located within the Sustainable Facilities (SF) Tool at <https://sftool.gov/>] to determine whether the intended contract action must include sustainable requirements in accordance with FAR [part] 23 [if not already detailed in the requirements package (see 511.002 (a))].~~

### ~~(2) *Statement of Work/Solicitation[Requirement Development].*~~

~~(i) [Consider the sustainability requirements discussed in FAR 11.002(d) and 511.002(a) and ensure coordination, as necessary, with any designated sustainability point of contact (see 504.7104).] If the procurement has sustainable requirements, confirm that all applicable provisions and clauses are included in the solicitation and that the statement of work or specification contains the minimum sustainable requirements.~~

~~(ii) When developing the statement of work or specification, consider including [Include post-award] procedures for verifying [contractor] compliance with sustainable requirements [contained in the contract]. Review[For best practices in verifying evidence of compliance, review] the Verification Guide for Purchasers of Sustainable Products [available] at <https://sftool.gov/>.~~

~~(iii) If a procurement cannot comply with the minimum sustainable requirements as outlined in GSAM 523.104(a)(1) due to significant impact on cost, schedule, or performance, the contracting officer must document the exception used and supporting rationale as detailed in GSAM 523.105.~~

~~(3) *Acquisition Planning.* The contracting officer shall follow 507.104 for acquisition plan requirements for addressing sustainable acquisition requirements.~~

~~(4) *Solicitation.* If the procurement has sustainable requirements, confirm that all applicable provisions and clauses are included in the solicitation and that the statement of work or specification contains the minimum sustainable requirements.~~

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## **~~523.105 Sustainability Exceptions.~~**

~~(a) *Allowable Exceptions.* An exception for acquiring sustainable products or services is available if any of the following conditions exist:~~

~~(1) Product or service cannot be acquired competitively within a reasonable performance schedule.~~

~~(2) Product or service cannot be acquired that meets reasonable performance requirements.~~

~~(3) Product or service cannot be acquired at a reasonable price.~~

~~(i) The price shall be deemed unreasonable when the total life cycle costs are significantly higher for the sustainable product or service versus the non-sustainable product or service. Life cycle costs are determined by combining the initial costs of a product or service with any additional costs or revenues generated~~



from that product or service during its entire life. (ii) For more information on conducting a life-cycle cost analysis (LCCA), review the guidance <https://sftool.gov/>.

## **523.106 Compliance Monitoring and Reporting.**

(a) ~~Review Process.~~ GSA Office of Acquisition Policy is responsible for monitoring and reporting sustainable acquisition activity to the GSA Chief Sustainability Officer in support of the agency's semiannual status report to Office of Management and Budget. This semiannual audit covers only applicable contract actions as defined in GSAM 523.103. This review will utilize existing GSA databases and processes to the maximum extent practicable in order to limit manual data collection. These reviews will focus on ensuring that GSA requires and receives sustainable products and services in all applicable acquisitions.

(b) ~~Determining Compliance.~~ See the GSA Sustainable Acquisition Review Criteria document available on GSA's Acquisition Portal at <https://insite.gsa.gov/acquisitionportal> for the specific criteria that will be used to determine compliance with sustainable acquisition reviews.

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## **Subpart 523.4 Use of Recovered Materials and Biobased Materials[Reserved] 523.403**

### **523.404 Agency affirmative procurement programs.**

GSA's affirmative procurement program is located within subpart 523.1, Sustainable Acquisition Policy.

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## **Part 570 Acquiring Leasehold Interests in Real Property**

### **570.117 Sustainable requirements for lease acquisition.**

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(a) ~~Pre-Award Procedures.~~ The contracting officer must ensure that the sustainable requirements within the lease templates are included in the awarded lease as specified by the PBS Leasing Desk Guide. Review Chapter 18 of the PBS Leasing Desk Guide that can be found on GSA's Acquisition Portal at <https://insite.gsa.gov/acquisitionportal> for guidance on ensuring sustainable requirements are included in leases.

(b) ~~Post-Award, Pre-Occupancy Procedures.~~

(1) ~~Sustainability Procedures.~~ For specific post-award sustainability procedures, review Chapter 18 of the PBS Leasing Desk Guide.

(2) ~~Receipt of Sustainable Products and Services.~~

(i) ~~The contracting officer must take reasonable steps to validate any required sustainable products and/or services are received. Review the best available evidence of compliance such as manufacturer product documentation,~~

~~design submittals, or green lease submittals to ensure the lessor is providing required sustainable products and services.~~

~~(ii) The contracting officer must note any discrepancies with sustainable requirements in the lease and provide feedback to the lessor.~~

~~(iii) When choosing what documents to review during sustainability compliance reviews, random sampling techniques can be utilized to limit the number of documents/evidence being reviewed. Staff/Service Offices may prioritize which products and/or services to focus on in their compliance reviews. For specific best practices in verifying evidence of compliance, review the Verification Guide for Purchasers of Sustainable Products at <https://sftool.gov/>.~~

~~(c) Post-Occupancy Procedures. The contracting officer must take reasonable steps to validate the lessor complies with all post-occupancy sustainable requirements in the lease. Review the Lease Management Desk Guide that can be found on GSA's Acquisition Portal at <https://insite.gsa.gov/acquisitionportal> for guidance on monitoring and documenting lessor compliance with all post-occupancy sustainable requirements.~~

~~(d) Sustainability Exceptions. If at any point during a real property lease acquisition the contracting officer determines that one of the mandatory sustainable requirements should not be included in the lease due to an allowable exception, the contracting officer must follow any applicable procedures as stated within the PBS Leasing Desk Guide.~~

~~(e) Compliance Monitoring and Reporting.~~

~~(1) Review Process. The PBS Leasing Office is responsible for lease compliance monitoring to determine compliance with the sustainable acquisition criteria specified in 570.117(e)(2). The PBS Leasing Office is responsible for coordinating these reviews with the GSA Office of Acquisition Policy. PBS Leasing Office is required to submit the results of these reviews to the GSA Office of Acquisition Policy. GSA Office of Acquisition Policy is required to monitor and report sustainable acquisition activity to the GSA Chief Sustainability Officer in support of the agency's semiannual status report to Office of Management and Budget.~~

~~(2) Determining Compliance. See the GSA Sustainable Acquisition Review Criteria document that can be found on GSA's Acquisition Portal at <https://insite.gsa.gov/acquisitionportal> for the specific criteria used to determine compliance with sustainable acquisition requirements.~~

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