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**Comments Received :**

I know you are not addressing Governments under this Announcement. I was concerned that you listed under Affected Public "Business or other for-profit organizations; Farms." Wanted to make sure you will be collecting data from Non Profits as well.

**Author Full Name :****Received Date :** 03/30/2022 11:21 AM**Comments Received :**

As the global economy transitions away from a linear petroleum-based, fossil fuel-driven model towards a more sustainable and circular one, it is imperative that society measure these changes in an effective and transparent manner. Government policy makers, businesses, and research institutions all require high quality, timely, and relevant data in order to make sound decisions concerning the growth of the bioeconomy. One important component critical to measuring the bioeconomy are material inputs comprised of renewable and otherwise reusable feedstocks. This is especially crucial in the manufacturing sector. After reviewing the material costs item (Item 18.) on the Census questionnaires for the manufacturing sector (questionnaires beginning with 'MC') as published on the recent Federal Register notice, we have included recommendations for updating the Census material codes for the 2022 Economic Census, in order to more accurately capture and measure sustainable and biobased material inputs. By adopting these recommendations, the Census Bureau will be in a much better position to provide data users with the indispensable statistics required to make sound policy, strengthen business decision-making, and educate the research community. One item of note—the hyperlink listed in the Register notice stated that the questionnaires listed were drafts for the 2022 Economic Census. However, the link directed us to the 2017 Economic questionnaires. We assume Item 18. On the manufacturing questionnaires did not change since 2017, and our comments are based on this assumption.

Best regards,

## **CREATION OF NEW CENSUS MATERIAL CODES FOR SUSTAINABLE AND BIOBASED MANUFACTURING**

### **INPUTS**

#### **All MC questionnaires- Create new material codes for:**

Paper containers and paper packaging products (except recycled)

Plastics containers and plastics packaging products (except recycled and biobased)

Glass containers and glass packaging products (except recycled)

Metal containers and metal packaging products (except recycled)

Biobased containers and biobased packaging products (from renewable sources, except paper and recycled)

Recycled paper containers and packaging products

Recycled plastics containers and packaging products (except biobased)

Recycled glass containers and packaging products

Recycled metal containers and packaging products

Recycled biobased containers and packaging products (from renewable sources, except paper)

#### **MC questionnaires beginning with 324, 325, and 326- Create new material codes for:**

Biobased chemicals (at least 50% from renewable feedstocks), blended with petroleum products

Biobased chemicals (less than 50% from renewable feedstocks), blended with petroleum products

Biobased chemicals (from renewable feedstocks), not blended with petroleum products

Biological products of animal origin (except raw agricultural products, biobased chemicals, and biowaste/biogas)

Biological products of plant origin (except raw agricultural products, biobased chemicals and biowaste/biogas)

Biological products not of animal or plant origin (e.g. microbes, etc.), except biobased chemicals and biowaste/biogas

Biogas (from renewable and biowaste feedstocks)

**MC questionnaires beginning with 325- Create new material codes for:**

Corn, raw

Soybeans, raw

Oilseeds, raw, except soybeans (e.g. canola, sunflower, flax, etc.)

Sugarcane, raw

Wheat, raw

Other grains and grasses, raw (rice, switchgrass, hay, etc.), except biowaste

Biowaste, raw

See related note on material code 11100033 below

**MC-32560, 32561, 32562- Create new material code for:**

Soaps and cleaning compounds **made** primarily from biobased chemicals and/or biological products from animal, plant, or microbial origin'--see related modification to material code 32561000 below.

**MC-32520, 32521, 32522, 32550, 32551, 32562, 32590, 32592, 32593, 32594, 32610, 32611, 32612, 32613,**

**32614, 32615, 32616, 32617, 32618, 32619, 3261B, 32622, 32623, 32624- Create new material codes for:**

Biobased plastics products (except biobased plastic containers and packaging products)

Plastics products (except biobased plastics, containers, and packaging products)

**MC-32590- Create new material codes for:**

Biobased paints and coatings (from renewable sources)

Paints and coatings, except biobased paints and coatings

**MC-32611- Create new material codes for:**

Biobased adhesives and sealants (from renewable sources)

Adhesives and sealants, except biobased adhesives and sealants

**MC-32622- Create new material code for:**

Biobased fabricated rubber products (from renewable sources)

**MC-32624- Create new material code for:**

Biobased fibers and filaments (from renewable sources)

### **Revisions to existing material codes**

Material code 32599810-- Modify description to 'Miscellaneous non-basic chemical products, except biobased chemicals from renewable sources'

Material codes 32411013, 31, 35, 37, 39, 41, and 32000014 can be combined into one material code, 'Petrochemicals and other refined petroleum products, not blended with biobased chemicals (from renewable sources)'. This would free up space for collection of biobased materials.

Material code 32518000- Modify description to 'All basic inorganic chemicals, excluding petrochemicals'. This modification is needed to ensure biobased chemicals are included elsewhere. Note- If these material codes are based on the NAICS codes then the current description is incorrect, since it currently includes organic basic chemicals, which fall under NAICS 325190 (not 325180).

Material code 325120001- Modify description to exclude biogas

Material code 11100033- Again, if material codes are based off the NAICS codes, then this material code should capture raw agricultural feedstocks. If this code is kept, recommend modifying description by replacing 'crude' with 'raw', since crude can include processed unrefined agricultural products. The preference would be to delete this material code and replace it with the new detailed raw agricultural material codes for questionnaires beginning with 325 that are listed above.

Material code 31122010- Modify description to 'Fats and oils, of plant or animal origin (all types)'

Material code 32541000- Modify this description to 'Pharmaceuticals and medicines, (excluding biobased chemicals and/or biological products from animal, plant, or microbial origin)'

Material code 32561000- Modify the description to 'Soaps and cleaning compounds, **excluding** products made primarily from biobased chemicals and biological products from animal, plant, or microbial origin)'

Material code 32599200- Modify description to exclude biobased products

Material code 32591002- Modify description to exclude biobased printing inks

Material code 32620100- Modify description to exclude biobased fabricated rubber products

Material code 32521200- Modify description to exclude biobased synthetic rubber

Material code 32522001- Modify description to exclude biobased fibers and filaments