

## **Supply Chain Risk & Resolution:**

### **Country of Origin (COO) and Other Catalog Issues**

#### **Background**

FAS regularly contacts Schedule contractors regarding the following Country of Origin (COO) and other catalog issues:

- Products that are not compliant with the Trade Agreements Act
- Products that inaccurately list the country of origin as “US” in GSA Advantage!®
- Duplicate products

#### **Trade Agreements Act (TAA) Compliance**

The Trade Agreements Act (TAA) implements numerous international trade agreements and other trade initiatives. The TAA applies to all GSA Schedule contracts unless otherwise stated in the solicitation or contract. The TAA limits the country of origin for products sold through your schedule contract to U.S.-made or designated country end products, as identified in clause [52.225-5](#). More information on TAA compliance is available [here](#).

#### **Products that inaccurately list the country of origin as “US” in GSA Advantage!®**

Schedule contractors are required by I-FSS-600 Contract Price Lists to maintain an accurate pricelist, including the country of origin for products. GSA regularly identifies products that indicate “US” as the country of origin where GSA has data suggesting the product originates in a country other than “US”. GSA refers to these as “MiA flagged products” (i.e., “Made in America”). Ensuring accurate “US” designations is important because it:

- Promotes fairness between competing Schedule contractors (a contractor could try to use their “made in the US” status as a competitive advantage);
- Assists bi-partisan efforts to maximize the purchase of goods, products and materials produced in the United States; and
- Is a contract requirement.

#### **Duplicate products**

Duplicate products are defined as two (2) or more identical products awarded on the same Schedule contract, under the same SIN or different SINs, at different price points. Removing duplicate products is important because it:

- Removes multiple price points
- Reduces customer confusion

#### **Process**

FAS may email your company’s point of contact for contract administration and/or authorized negotiators regarding potentially non-compliant products. FAS will seek to resolve MiA, TAA and

duplicate products for flagged contracts by requiring Schedule contractors to, as applicable, 1) re-affirm the current country of origin designation, 2) change the designation to the correct country of origin, or 3) delete the product if it is TAA non-compliant or duplicate product. Schedule contractors will generally have a few weeks to review the products and update the GSA Advantage! catalog. If you are contacted, please respond to GSA in accordance with the instructions in the email. Products may be deleted from your contract if you:

- Take no action
- Don't update your GSA Advantage!® catalog file within the designated timeframe
- Modify the format of the Excel file and/or do not respond in accordance with the instructions
- Choose "US" country codes for all the "MiA"-flagged products