August x, 2022

The Honorable Deb Haaland

Secretary

U.S. Department of the Interior

1849 C Street, NW

Washington, DC 20240

Dear Secretary Haaland:

Thank you for your bold leadership within the federal government to reduce harmful single-use plastics. We support your Secretarial Order (No. 3407), issued on World Oceans Day, which will phase out the procurement, sale, and distribution of single-use plastic products and packaging across the U.S. Department of the Interior lands and offices by 2032. This historic order establishes the department as a role model for other federal agencies and society at large to take meaningful action and reduce the impacts of plastic pollution in communities and the environment.

While this is a big step forward, we believe that the department can and must do more to turn the tide of this harmful pollutant. With this letter, we provide recommendations to shorten the 10-year timeline, prioritize reuse and refill systems, and caution against bioplastic alternatives.Our coalition has expertise and vendor relationships that could help guide your staff in phasing out single-use plastics. We are offering our support to achieve this worthy goal in the near term and spark the immediate action needed.

As you know, plastic pollution devastates communities, the environment, and the climate. Fenceline communities — particularly Latino/a/x, Black, Indigenous, under-resourced and or economically oppressed communities — are disproportionately impacted by plastic production and disposal facilities. These facilities pollute air, water, and soil — and consequently, harm these communities’ health. Scientists estimate that 33 billion pounds of plastic wash into the ocean every year.[[1]](#endnote-1) Furthermore, the production, consumption, and disposal of plastics generate immense amounts of greenhouse gas emissions, which further endangers frontline communities or those who experience the most immediate and worst consequences of climate change. If we compare global greenhouse gas emissions from plastics to the top polluting countries, plastics rank as the fifth-highest emitter in the world.[[2]](#endnote-2),[[3]](#endnote-3)

Recycling alone will not solve this problem, since less than 6% of U.S. plastic waste is recycled.[[4]](#endnote-4) Despite this failure, the plastics industry expects to increase production exponentially, continuing to impact our planet and our communities with devastating consequences. To combat the plastic pollution crisis, we must reduce the production and use of single-use plastics.

As this toxic crisis worsens, the department has no time to waste. We ask that you act as quickly as possible to phase out single-use plastic products and implement most changes by January 2025. Specific actions that shorten the 10-year phaseout include the following:

* Identify and prohibit single-use plastics in all new contracts while taking into account the needs of those with differing abilities or restrictions that require the use of certain single-use plastic items;
* Immediately stop the procurement of expanded polystyrene products;
* Renegotiate existing contracts with concessionaires that use single-use plastic;
* Review purchases that do not require a contract to eliminate single-use plastic products;
* Ensure that all new facilities and facility renovations include drinking refill stations with access to clean water; and
* Swiftly implement a plan to reduce single-use plastic in the Department of the Interior’s Washington, D.C., offices and event spaces, which could serve as a model for the rest of the federal government.

We also urge the department to prioritize eliminating the procurement, sale, and distribution of single-use plastics in all 423 national parks while leveraging your considerable purchasing power to push suppliers and manufacturers toward viable alternatives. After a 2011 Obama administration policy went into effect, 23 national parks banned the sale of single-use plastic water bottles, eliminating between 1.3 and 2 million disposable plastic water bottles and saving up to 111,743 pounds of plastic and 141 metric tons of greenhouse gas emissions.[[5]](#endnote-5) Although this policy was unfortunately reversed in 2017 by the Trump administration, your order puts the department on track for even more significant reductions.

Today, many parks and concessionaires are leading the way in reducing single-use plastics, including installing water refill stations, selling reusable bottles and bags, moving to fountain or keg beverages in their restaurants, and offering water packaged in aluminum cans. With the National Park Service and its suppliers hosting more than 300 million visitors each year and managing approximately 70 million tons of trash,[[6]](#endnote-6) it is well-positioned to drive meaningful reductions in plastic pollution and educate its visitors on the impacts of single-use plastic.

We are concerned by the mention in your order of bioplastic products as environmentally preferable alternatives to single-use plastic products. While we recognize the complexity of the shift away from single-use plastics that the department is undertaking, “bioplastics” are widely considered among experts in relevant fields as a non-solution that delays the ultimate goal. “Bioplastics” is a broad term that encompasses a wide range of materials, even including those made from a hybrid of renewable biomass and petroleum-based plastic. Many of these options require specific treatments in our waste management systems, yet behave like conventional plastic in the environment, creating confusion with the public and posing the same harmful threats to our communities. The best alternative to harmful plastic products is to use non-toxic reusable or refillable products that can provide the same service without using any disposable material at all.[[7]](#endnote-7)

Let’s look to our plastic-free past, when refillable and reusable solutions could be used repeatedly to reduce the accumulation of unnecessary waste. Today, the resources are available to make these systems even more convenient for consumers and visitors to public lands. We recommend making inexpensive, American-made reusable water bottles available for purchase from vendors, paired with clear educational materials urging visitors to bring their own bottles and providing free reusable bottles for those who cannot afford them. Concessionaires, food service establishments, and retailers should implement in-store policies to encourage reusable bags and phase out disposable ones (especially plastic). We also recommend that food service establishments and concessionaires use non-toxic reusable cups and tableware in their operations. This approach could also provide an opportunity to create reusable branded products that will increase revenue and visibility over time. Prioritizing refill and reuse solutions over disposable alternatives is the best way to reduce our country’s reliance on single-use plastic and can quickly reduce cost.

We collectively applaud you for recognizing the harmful impacts of toxic single-use plastic on our communities, climate, and environment. We look forward to supporting the department to ensure implementation of this order is swift and successful.

Sincerely,

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2. Wright, Laurie (May 15, 2019) Plastic warms the planet twice as much as aviation - here’s how to make it climate-friendly. *The Conversation*. Available:<https://theconversation.com/plastic-warms-the-planet-twice-as-much-as-aviation-heres-how-to-make-it-climate-friendly-116376>. Accessed Jun 29, 2021. [↑](#endnote-ref-2)
3. Climate Watch Data (n.d.) China Climate Change Data. In: *Climate Watch.* Available [↑](#endnote-ref-3)
4. Volcovici, Valerie (May 5, 2022) U.S. plastic recycling rate drops close to 5%-report. *Reuters*. Available:<https://www.reuters.com/world/us/us-plastic-recycling-rate-drops-close-5-report-2022-05-04/>. Accessed Jul 8, 2022. [↑](#endnote-ref-4)
5. The National Park Service. (2017) Disposable Plastic Water Bottle Recycling and Reduction Program Evaluation Report. *United State Department of the Interior*, p. 8. Available: <https://www.nps.gov/aboutus/foia/upload/Disposable-Plastic-Water-Bottle-Evaluation-Report_5_11_17.pdf>. Accessed Jul 3, 2022. [↑](#endnote-ref-5)
6. The National Park Service. (2022) Teaming up to keep park waste out of landfills. Available: <https://www.nps.gov/articles/000/teaming-up-to-keep-park-waste-out-of-landfills.htm#:~:text=Choose%20materials%20that%20can%20be,when%2Fwhere%20access%20is%20available>. Accessed Jul 3, 2022. [↑](#endnote-ref-6)
7. 5 Gyres Institute (2017) Better Alternatives Now: B.A.N List 2.0. 25p. [↑](#endnote-ref-7)