

August 25, 2022

The Honorable Deb Haaland
Secretary of the Interior
U.S. Department of the Interior
1849 C Street, NW
Washington, D.C. 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.ⁱ 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, plastic ranks as the fifth-highest emitter in the world.^{ii,iii}

Recycling alone will not solve this problem, since less than 6% of U.S. plastic waste is recycled.^{iv} 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 park units 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 million and 2 million disposable plastic water bottles and saving up to 111,743 pounds of plastic and 141 metric tons of greenhouse gas emissions.^v 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,^{vi} 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.^{vii}

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,

100 Grannies for a Livable Future
1000 Grandmothers for Future Generations
350 Brooklyn
350 Climate Action SoCal
350 Humboldt
350 NYC/WasteNØt
350 Sacramento
350 Seattle
350 Silicon Valley
350 Ventura County Climate Hub
5 Gyres Institute
Active San Gabriel Valley
Alaska Community Action on Toxics
All Our Energy
Anacostia Riverkeeper
Assateague Coastal Trust
Atchafalaya Basinkeeper
Athens ReThink Plastics
AU Environmental Action Coalition
Awarehaus.com
Azul
Ban SUP
Beaver County (PA) Marcellus Awareness Community (BCMAC)
Between the Waters
Beyond Plastics
Big Blue and You
Black Warrior Riverkeeper
Breathe Project
Broward Sierra Group
Brown Girl Surf
Cafeteria Culture
Cahaba Riverkeeper
CALPIRG (California Public Interest Research Group)
CALPIRG Students
Capital Region Interfaith Creation Care Coalition
Center for Biological Diversity
Cetacean Society International
Chair, Concord on Tap
Change The Chamber*Lobby For Climate
Chautauqua-Conewango Consortium
Chirping Birds Society
Church Women United in New York State
Clean Fairfax
Clean Water Action
Climate Action Alliance of the Valley
Coalition to Protect America's National Parks
Collier County Waterkeeper inc.
Concerned Health Professionals of Pennsylvania
Coney Island Beautification Project, Inc.

Cook Inletkeeper
Coosa River Basin Initiative/Upper Coosa Riverkeeper
Corporate Accountability
Debris Free Oceans
Earth & Me, LLC
Earth Island Institute
Earth Law Center
Ecology Center
Effect Partners
Ekosfere
Elders Climate Action (ECA)
Elders Climate Action (ECA) Maryland Chapter
Elders Climate Action (ECA) NorCal Chapter
Elders Climate Action (ECA) SoCal Chapter
Emerald Keepers
Endangered Species Coalition
Environment America
Environment Georgia
Environment Illinois
Environment Oregon
Environment Texas
Environment Washington
Environmental Defense Center
Fenceline Watch
FoCo Trash Mob
Food & Water Watch
FreshWater Accountability Project
Friends of Dyke Marsh
Friends of the Mariana Trench
Friends of the San Juans
GAIA
Gotham Whale
Grassroots Environmental Education
Green Clean Athol
Green Schools Alliance
GreenLatinos
Greenpeace USA
Gunpowder RIVERKEEPER®
Haw River Assembly
Healthy Ocean Coalition
Heirs To Our Oceans
Hispanic Federation
HOMAGE
Hudson Riverkeeper
Humane Action Pittsburgh
Humboldt Baykeeper
Illinois PIRG
Inland Ocean Coalition
Interfaith Climate Group
International Marine Mammal Project of Earth Island Institute
Lake Coeur d'Alene Waterkeeper/Kootenai Environmental Alliance
LEAD Agency, Inc.
League of Conservation Voters
Lite Foot Company
Live Zero Waste
Lonely Whale

Lopez-Wagner Strategies
Los Angeles Waterkeeper
Lynnhaven River NOW
MacCoy Home Solutions
Marine Conservation Institute
Marine Mammal Alliance Nantucket (MMAN)
Maryland PIRG
Mazaska Talks
Miami Waterkeeper
Milwaukee Riverkeeper
Missouri River Bird Observatory
Mystic Aquarium
Napa Climate Now/350 Bay Area
Nassau Hiking & Outdoor Club
National Aquarium
National Ocean Protection Coalition
National Parks Conservation Association
National Stewardship Action Council
Nature in the City
NY/NJ Baykeeper
NY4WHALES
Occidental Arts and Ecology Center
Ocean Alliance, Inc.
Ocean Conservancy
Ocean Conservation Research
Ocean First Education
Ocean First Institute
Oceana
Oceanic Global
Oceanic Preservation Society
Orange County Coastkeeper
Organizing for Plastic Alternatives
Our Marsh Counts - Clean Waters Initiative
Patagonia
Peconic Baykeeper
Physicians for Social Responsibility Pennsylvania
Plaine Products
Plastic Pollution Coalition
Point Defiance Zoo & Aquarium
Potomac Riverkeeper Network
Prepare with Cher
Public Employees for Environmental Responsibility
r.Cup
Raritan Riverkeeper
Repair the Sea | Tikkun HaYam
Resource Depot
Rio Grande International Study Center
Russian Riverkeeper
Safer States
Sailors for the Sea Powered by Oceana
San Antonio Bay Estuarine Waterkeeper
Save the Manatee Club
Sea Hugger
Sea Shepherd
Seaside Sustainability
SeaSmart

SeaStraw13
Seattle Aquarium
Seatuck Environmental Association
Seeding Sovereignty
Seneca Lake Guardian
Shark Stewards
Sierra Club
Sisters of Charity Federation
Sisters of Charity of Leavenworth Office of Justice, Peace, and Integrity of Creation
Sisters of Charity of Nazareth Congregational Leadership
Sisters of Charity of New York
Sisters of Charity of Our Lady of Mercy
Sisters of Charity of Saint Elizabeth, Office of Peace, Justice, and Ecological Integrity
Sisters of Charity of Seton Hill
Society of Native Nations
South Shore Audubon Society
Spokane Zero Waste
St. Marys Riverkeeper
Storm Surge
Surfing Florida Museum
Surfrider Foundation
Surfrider Foundation Palm Beach County Chapter
Sustainable Mill Valley
Sustainable Roanoke
Sustainable Villages
SYRCL
TAO (Tethra Advisors and Officers)-Blue Economy, Blue Tech and Blue Eco-System Consultancy
Tennessee Riverkeeper
Texas Campaign for the Environment
The Center for Oceanic Awareness, Research, and Education (COARE)
The CLEO Institute
The Climate Reality Project, Baltimore Area Chapter
The Climate Reality Project, California Coalition
The Climate Reality Project, Los Angeles Chapter
The Climate Reality Project, Montgomery County
The Climate Reality Project, Orange County Chapter
The Climate Reality Project, San Diego Chapter
The Climate Reality Project, San Fernando Valley Chapter
The Climate Reality Project, San Francisco Bay Area Chapter
The Climate Reality Project, Santa Barbara Chapter
The Last Beach Cleanup
The Last Plastic Straw
The Ocean Project
The Phoenix Group
The Story of Stuff Project
Think Zero LLC
Three Rivers Waterkeeper
Thrive At Life: Working Solutions
TNP
Transformative Wealth Management, LLC
Turtle Island Restoration Network
U.S. PIRG
Upper Allegheny Waterkeeper
Virginia Aquarium & Marine Science Center
Virginia Conservation Network
Waterkeeper Alliance

Waterkeepers Chesapeake
Waterway Advocates
WESPAC Foundation, Inc.
WILDCOAST
Winyah Rivers Alliance
Yuba River Waterkeeper
Zero Waste Company
Zero Waste Hawai'i Island
Zero Waste Ithaca
Zero Waste Washington

ⁱ Forrest A, Giacobazzi L, Dunlop S, et al. (2019) Eliminating Plastic Pollution: How a Voluntary Contribution From Industry Will Drive the Circular Plastics Economy. *Front. Mar. Sci.* 6: 627. doi: 10.3389/fmars.2019.00627

ⁱⁱ 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.

ⁱⁱⁱ Climate Watch Data (n.d.) China Climate Change Data. In: *Climate Watch*. Available: <https://www.climatewatchdata.org/countries/CHN>. Accessed August 24, 2022.

^{iv} 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.

^v 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.

^{vi} 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.

^{vii} 5 Gyres Institute (2017) Better Alternatives Now: B.A.N List 2.0. 25p.