

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.<sup>i</sup> 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.<sup>ii,iii</sup>

Recycling alone will not solve this problem, since less than 6% of U.S. plastic waste is recycled.<sup>iv</sup> 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.<sup>v</sup> 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,<sup>vi</sup> 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.<sup>vii</sup>

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

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<sup>i</sup> 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

<sup>ii</sup> 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.

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

<sup>iv</sup> 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.

<sup>v</sup> 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](https://www.nps.gov/aboutus/foia/upload/Disposable-Plastic-Water-Bottle-Evaluation-Report_5_11_17.pdf). Accessed Jul 3, 2022.

<sup>vi</sup> 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.

<sup>vii</sup> 5 Gyres Institute (2017) Better Alternatives Now: B.A.N List 2.0. 25p.