
Single-Use Plastics

— And GSA Rulemaking —

Discussion

- Background of steps taken to date.
- Seeking advice to understand which solution (or combinations of solutions) GSA should pursue.
 - Would like to understand pros and cons
 - Would like to understand potential unintended consequences

Why Is GSA Considering Plastics?

- GSA received petition from the Center for Biodiversity in December 2021. The petition identified risks associated with plastics and how it relates to products.
- Additional research to determine the response to the petition conducted, to include consulting experts in single -use plastics at the EPA.
- The petition was granted in part and denied in part based on GSA's research and how procurement could be utilized in this space.

Why Consider Packaging?

- It makes 40% of plastic.
- Per the EPA in 2018 single-use plastic containers alone accounted for 14.5 million tonnes of plastic.
- It is understood to be single -use (i.e. once used in shipment it is immediately thrown out).
- There is a cost associated with waste disposal that is economic, social, and environmental.
- It resonates with people because they can see the waste and immediately see the impact.

Thinking Through the Problem Reduction, Reuse, or Recycle?

- Reduce - lowest cost, low effort change (don't consume it in the first place)
- Reuse - lowest cost for Government, initial cost to industry, to gather trash to directly reuse
- Recycle - Highest cost and so far least successful with plastic since less than 9% of world plastic is recycled

Steps Already Taken

- GSA received a petition to address plastics that was answered in part and denied in part.
- GSA published an advanced notice of proposed rulemaking to address single-use plastics.
- There were thousands of comments asking GSA to address this topic, to include major industry and congressional responses
- GSA seeks additional guidance from the Federal Advisory Committee on this topic.

Overview of ANPR Responses

- Overall positive, and regardless of industry, encouragement for actions to take.
- Individuals asked for change citing their concerns about plastic waste, specifically in coastal communities.
- Advised GSA to not conflate materials (e.g., aluminum, paper, and plastic) with material properties (e.g., compostability, durability), and packaging system and design (e.g., single -use, refillable, recyclable). Need to change not just thoughts toward risk to product, but social and environmental impacts
- Recommended that agency goals to change packaging be included in all solicitations

ANPR Responses Continued

- Respondents, companies that highlighted the use of packaging in branding
- Addressed stability of products themselves (in this case cleaning or cosmetic products)
- Highlighted that reuse of packaging can be helpful with uncertainties in the supply chain

Industry Comment - Plastics and Resin Industry

- Overall the responses asked for more recycling. Plastic packaging upticked at the millennium, and still remains the least recycled material.
- Asked about where the plastic is coming from, is the packaging material made overseas (this information was not provided, nor was any economic information provided).

Congressional Responses

[Senator Carper Letter](#)

[Multiple Congressional Member Letter](#)

[Representative Griffith](#)

[Representative Pence](#)

Other Government Plastic Policies

- New Zealand has a Regulatory Impact Analysis available on how they implemented plastic reductions
- Australia, Scotland, California, and Maine all have varying levels of information available on how they are pursuing not only reducing single-use plastics but banning them

Challenges:

- Asking industry partners to update their commercial practices
- Clearly stating the objective is not a ban on plastics, but a reduction of waste
- Educating both industry partners and Government as to how to address plastic waste
- Increase communication with industry to keep this conversation going, since first time at federal level the questions in the ANPR asked
- Going beyond already existing regulations such as USDA's BiopREFERRED program

Other Thoughts?