



2023 Sustainable Procurement Plan

Bureau of Reclamation

U.S. Department of the Interior

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1. Executive Summary

In June 2022, the Secretary of the Interior issued Secretary's Order (SO) No. 3407 *Department-Wide Approach to Reducing Plastic Pollution*. The order prioritizes action to reduce the amount of plastic waste produced by operations within the Department of the Interior, and specifically to phase out single-use plastics (SUPs) by the end of 2032. Under this order, SUPs are defined as plastic products intended to be disposed of immediately after use, including plastic and polystyrene food and beverage containers, bottles, straws, cups, cutlery, and disposable plastic bags. In accordance with Section 5 of SO 3407, and to further the goals of Executive Order (EO) 14057 *Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability*, the Bureau of Reclamation (Reclamation) has been tasked with developing a Sustainable Procurement Plan to reduce the amount SUPs it procures, sells, and distributes while prioritizing products that can be reused, refurbished, or recycled.

Since 1902, Reclamation is best known for the dams, powerplants, and canals it has constructed in the 17 Western states. Reclamation also manages approximately 6.5 million acres of land and water, most of which is available for public outdoor recreation at 187 developed recreation areas, including campgrounds, boat launch ramps, miles of shoreline, and vehicle and trailer sites. In addition, approximately 115 concessionaires operate at these locations, where they offer a variety of outdoor facilities and services to the public. Reclamation also maintains 35 regional, area, and field offices and 1,774 buildings. These locations provide the most potential opportunities to establish new procurement policies and practices that can reduce Reclamation's plastic footprint over the next 10 years.

Understanding Reclamation's SUP consumption will assist the agency in developing feasible reduction goals to implement across Reclamation and develop a timeline for the implementation of future initiatives and plans.

An initial analysis of procurement data via Federal Acquisition Regulation (FAR)-based contracts between October 2017 and November 2022 revealed that SUPs were not major components of contract requirements. Additionally, a purchase card report analysis of the Upper Colorado Basin Region from March 2020 through November 2022 found that SUP purchases totaled approximately \$30,000; however, this analysis exposed the difficulties of tracking and sorting this kind of data due to inconsistencies in the way SUP purchases are recorded. As a result, a broader, more in-depth analysis that includes all Reclamation regions would not likely identify the entirety of SUP purchases throughout the agency. While current acquisition policies include green procurement and provide opportunities for purchasers/requestors to identify green purchases, the current system is being replaced and the process to capture SUPs purchase will need to change.

These analyses indicated that:

- FAR-based contracts will likely not represent meaningful opportunities to reduce SUP procurement and will not be Reclamation's focus

- A proper baseline of SUP procurement via purchase cards will be difficult to obtain, and future reporting and data collection will require a new tracking mechanism that can be standardized and used across the regions
- Language to include specific SUPs in Reclamation’s new green procurement tracking form (Customer Requirements Procurement Package) and other policies must be updated with clear guidelines to encourage sustainable alternatives

This Sustainable Procurement Plan (SPP) outlines the necessary, preliminary objectives and strategies to jumpstart Reclamation’s SUPs reduction and address potential challenges and opportunities the agency will face in the future. To comply with the goals of SO 3407, Reclamation will begin by doing the following:

- Conduct a series of data collection phases to identify facilities and concessions where SUPs are procured and sold, including the contracts or agreement instruments
- Analyze current contracts to determine which ones will be most impacted by agency actions and establish an appropriate schedule to engage partners
- Use solid waste data reporting (currently being updated) to establish a baseline plastic waste stream assessment

With the initial steps outlined above, Reclamation will make meaningful progress toward reducing single-use plastic consumption and will improve regional communication and agency-wide procurement tracking systems for a more sustainable future. In collaboration across Reclamation regions and with non-Federal partners, Reclamation will develop and implement a complete SUP reduction plan as required by SO 3407 following further data collection and analysis.

2. Schedules and Annual Targets Addressing the Reduction of Procurement, Sale, and Distribution of Single-use Plastic Products

Reclamation currently oversees nearly 300 recreation and wildlife management areas, most of which are managed by partners through varying forms of agreements with terms of 25 to 50 years. As many of these agreements have been authorized through one or multiple authorities such as the Federal Water Project Recreation Act of 1965 (Pub. L. 89-72; 79 Stat. 213, 214; 16 USC 4601 et seq.), as amended; Reclamation Recreation Management Act of 1992 (Pub. L. 102-575, Title XXVIII; and other Project-specific authorities, the management of each area may be unique while still following the Policies, Directives and Standards set forth within the Reclamation Manual. In addition, Reclamation management areas may also include a variety of additional products or services offered through concession operations. Each concession will also be maintained under separate agreements with their own terms. In addition, Reclamation directly manages one-fifth of the agency’s management areas, which may also have concession opportunities.

Using implementation plans established in response to other Secretarial Orders, Reclamation can leverage plans to conduct outreach to each Region, Area Office, and managing partner to collect additional data pertaining to SO 3407. This outreach and data collection will be a key factor in the ability to successfully implement the SPP and the reduction of SUP pollution. It will also aid in appropriately adjusting the SPP timeline due to potential challenges in reviewing and altering contract and agreement terms in accordance with the SPP.

2.1 Phased Data Call and Implementation Strategy

- The following phases will be implemented to collect data related to current SUP purchases:
- Phase 1: Data Call (October-November 2023) – The Reclamation Environmental Compliance Division and Acquisitions Group in Denver will work with each region to identify all covered facilities and concession operations, collect, and analyze all contract or agreement instruments, and may include a Department of the Interior Solicitor review.
- Phase 2: Data Call and Analysis (October-November 2024) – After Reclamation determines which contracts will be impacted, the second data call will focus on establishing a baseline dataset to identify the SUP types that are being procured, sold, or used.
- Phase 3 (ongoing and flexible) – Following the analysis of contracts and establishment of the baseline dataset, Reclamation will develop a schedule to engage managing partners based on impacts to small concession operations; Reclamation will also determine whether the agency has the authority to re-open and alter contracts. Phase 1 may reveal that this step is unnecessary.

Reclamation regions report solid waste management data on an annual basis. This data will support Phase 1 activities, including determining the amount of plastic material entering the waste stream.

Reclamation’s recreation program is largely managed by a wide range of autonomous entities, and Reclamation faces unique challenges with implementation of mandates that may result in changes to contracts and agreements. Timelines and reduction goals for the procurement, consumption, and disposal of SUPs will be established in future years, following data analysis and identification of potential challenges associated with altering contract and agreement terms.

2.2 Preliminary Procurement Analysis

Reclamation conducted an analysis of FAR-based contracts using data from the Federal Procurement Data System (FPDS) Individual Data Item Oversight Tracker. The report showed all FAR-based awards over a 5-year period from October 1, 2017, through November 9, 2022, with a total of 7,287 actions. Reclamation then conducted a search using the following Product Service Codes (PSC) related to vending, food service, and containers/packaging:

- 81XX – Containers/packaging/packing supply
- M1FD – Operation of Dining Facilities

- 3550 – Vending and Coin Operated Machines

Other than the purchase of storage containers under PSC 81XX, no contracts appeared to use single-use plastic as a major component of the requirement.

In fiscal year 2022, Reclamation spent \$37 million via purchase card transactions. The agency reviewed approximately 30,000 Upper Colorado Basin Region purchase card transactions from March 2020 through November 2022 to identify the purchases of SUPs; however, these data were not searchable by any SUP categories, so a manual search of the data was completed using keywords associated with SUPs (e.g., case, bottle, Gatorade, water, bag, Ziploc, plastic, etc.). The search identified 193 purchases that appeared to be for bottles or cases of water or other drinks representing approximately \$15,000 in purchases. In addition, 85 purchases appeared to contain plastic bags, trash bags, Ziploc, or storage bags representing approximately \$30,000 in purchases. The accuracy of data is limited due to potential variations or inaccuracies in how the purchase card user described the items in the purchase log. Also, these items may have been purchased along with other non-SUP items and were not recorded accurately. A separate analysis of 12 months of Reclamation-wide Amazon purchases showed that 17 purchases included SUPs such as trash bags, sport/energy drinks, and zipper bags.

In order to properly create a baseline of how many SUP items are procured via the purchase card, a new tracking mechanism would need to be created to replace the current online purchase log, which does not allow for customization in ways that could properly track these purchases. Reclamation does not currently have such a tracking system, and future iterations of the SPP will address how Reclamation plans to record SUP purchases via purchase card or other actions in ways that allow for tracking progress toward reduction goals.

3. Updates to Acquisition and Procurement Policies and Practices

Currently, requestors for all new FAR-based procurements over the micro-purchase threshold are required to submit a Green Procurement form as prescribed in section WBR 1423.103 of the Reclamation Acquisition Regulation (RAR). This form includes a section for the requestor to identify whether the requirement contains items that fall under certain designated green (i.e., environmentally friendly) categories, including products that could be categorized as biobased or recycled content. For example, the biobased section includes a link to United States Department of Agriculture’s (USDA) Bio-preferred Program Catalog. This catalog contains products that qualify for mandatory Federal purchasing, are certified through the voluntary labeling initiative, or both. Currently, many SUPs are identified in the catalog, including food service/cafeteria products such as disposable cutlery and tableware. It also includes various types of shopping and trash bags. Reclamation is phasing out this Green Procurement form, with the contents to be incorporated into a new form called the Customer Requirements Procurement Package. In order to capture any SUP being purchased within FAR-based contracts, the SPP team recommends updating the Customer Requirement Procurement Package to require the requestor to identify whether the project includes the need for any SUPs, and if so, to consider alternatives that the

Contracting Officer would need to approve. The proposed new language in the Customer Requirements Procurement Package is:

“Under Secretary’s Order No. 3407, *Department-Wide Approach to Reducing Plastic Pollution*, the term ‘single-use plastic products’ means plastic items intended to be disposed of immediately after use, including plastic and polystyrene food and beverage containers, bottles, straws, cups, cutlery, and disposable plastic bags.”

Completion of this change is recommended for FY23.

To target SUP purchases made using the Purchase Card, Reclamation’s purchase card policy published in the Purchase Business Line Requirements Handbook (PURLBOOK) will be updated to strongly encourage purchasers to consider sustainable alternatives to SUPs. The following language will be incorporated into the PURLBOOK in FY23 as a new cardholder responsibility:

“Purchases environmentally preferable items to the maximum extent practicable. This includes purchasing alternatives to single-use plastic products to reduce the amount of plastic waste. The term “single-use plastic products” means plastic items intended to be disposed of immediately after use, including plastic and polystyrene food and beverage containers, bottles, straws, cups, cutlery, and disposable plastic bags. Per Secretary Order No. 3407 Department-Wide Approach to Reducing Plastic Pollution, DOI is to prioritize actions to reduce the amount of plastic waste, specifically the use of single-use plastics, in support of the goals of Executive Order 14057 Catalyzing Clean Energy Industries and Jobs through Federal Sustainability.”

Additionally, to target purchase card transactions through the DOI Enterprise Amazon account, Reclamation has established a new buying policy for all categories that pertain to SUPs (i.e., trash bags, disposable cutlery, energy and sport drinks, disposable zipper bags) called *Reduction of Single-Use Plastics*. This policy will not restrict the purchase of SUPs, but purchasers will receive the following message before placing the order: “Per SO No. 3407 DOI Approach to Reducing Plastic Pollution, DOI shall reduce the amount of plastic waste, specifically the use of single-use plastics such as disposable plastic bags, food and beverage containers, bottles, straws, cups, and cutlery. Consider a green alternative.”

4. Data Collection Methods, Metrics, and Reporting Requirements

Reclamation is equipped for the collection and reporting of various types of data that can potentially be used to monitor, track, analyze, and report the status of use and reduction of SUPs. The information available to Reclamation includes data from the following programs:

Environmental Compliance / Hazardous Materials Program

- Solid Waste Database: Provides data that identifies the waste stream types, including recycled and reused materials

Acquisitions Services

- Contract Searches:
 - Financial Business Management System (FBMS):
 - Provides the number of contracting actions involving procurement of materials eligible under the FAR-required green categories
 - Provides the dollars spent involving the procurement of materials eligible under the FAR-required green categories
 - Green Procurement Contract: Review of Green Procurement Contract (GPC) Forms required in a Purchase Request (PR) package that indicates the procurement of materials eligible under the FAR-required green categories, including the review of the number of GPC Forms that request a waiver to bypass the purchase of materials required under the FAR green categories
 - Product Service Codes (PSC): Search in FBMS for SUP/SUP Alternative PSC to provide quantity and frequency of these purchased materials
- Purchase Card Searches by Transaction:
 - Charge Card Servicing Bank (Citibank) transaction reports: Search by description and key words provides indicators to determine the number and type of SUP/SUP Alternative procured
 - Amazon Purchases: Search by description and key words provides indicators to determine the type and number of SUP/SUP Alternative procured
 - Financial Business Management System (FBMS): FBMS provides indicators for each type of FAR green category. Green category indicators provide a mechanism to pull data on the quantity and dollar amount of materials eligible under the FAR-required green categories

By using the tools and systems that are currently in place, Reclamation has the potential to conduct an analysis using the available data from the appropriate data sources, sample size, and timeline (e.g., transactions within the past 5 years) to identify trends regarding the frequency and quantity of SUPs procured. This analysis can help Reclamation understand past needs for the products and services that use SUPs. Once understanding is gained from this data, the following actions can be implemented:

- A baseline metric can be developed to measure use and reduction of SUPs across all types of SUP uses and disposal.
- Current tools and systems can be modified to include specific indicators for SUPs and/or SUP Alternatives when measuring waste and procurement of materials
 - Solid Waste reporting includes a requirement to report an isolated measure for SUP disposal/recycling
 - Acquisitions Services adds a SUP Alternative green category to accompany the FAR-required green categories that can be searched in FBMS
 - Acquisitions Services includes a SUP/SUP Alternative section in the GPC form to indicate when SUP Alternatives are being considered in lieu of SUPs; this will also indicate if waivers are being used to bypass the SUP Alternatives

- Purchase Card required documentation such as a credit card log or online log is required to indicate specific information about a transaction, including indicators when green products are being procured and specifically add SUP/SUP Alternatives as a green category indicator
- Purchase Card reallocation system in FBMS adds a SUP Alternative green category to accompany the FAR required green categories that can be searched in FBMS

Reclamation will investigate developing a mechanism in the existing tools and systems that will enable efficient and consistent data requests or reporting specifically for SUP/SUP Alternatives by the newly modified indicators specific to SUP/SUP Alternatives.

Data collection should include a consolidated report template of data from these tools, and reports should be collected quarterly at the implementation of this SPP until a comprehensive baseline and trend are established. Once the appropriate tools, systems, and mechanism modifications are in place, the frequency of data collections should remain quarterly to analyze impacts of the modified tools/systems. This would allow for gap analysis and determine where improvements in the methods for data collection will be needed.

Once consistency in the data is observed, goal setting should be measured from the baseline based on trend analysis and identification of focus areas for reduction of SUP use and increased use of SUP Alternatives.

Reporting on SUP/SUP Alternatives should implement the following phased approach:

- Years 1 to 2: Quarterly reporting to monitor and track success or inefficiencies of methods
- Years 3 to 5: Quarterly reporting of goal accomplishments for the reduction of SUPs and increased use of SUP Alternatives
- Years 5 to 8: Semi-annual reporting to track and monitor goal accomplishments for the reduction of SUPs and increased use of SUP Alternatives
- Years 9 to 10: Annual reporting to track and monitor goal accomplishments and achievement of goals under the SO for the reduction of SUPs and increased use of SUP Alternatives
- Year 11 and beyond: Annual reporting to track and monitor goal accomplishments and to verify that the reduction of SUPs and increased use of SUP Alternatives are maintained.

5. Analysis of Alternatives to Single-use Plastics

Despite recycling campaigns and stronger regulations aimed at reducing the amounts of plastic waste generated, waste from food and beverage containers, bottles, straws, cups, cutlery, and disposable plastic bags still makes up a significant percentage of the solid waste within municipal facilities, and recycling/reuse rates remain low. This is because oil-based polymers used in plastic and packaging have complex composites with varying levels of contamination. In recent years, significant progress has been made in the development of biodegradable polymers (BDP). BDPs are used to produce biodegradable materials with similar functionality to that of

oil-based polymers, which provides environmental benefits such as reducing waste and balancing greenhouse gas emissions¹.

There are numerous alternatives used in single-use plastic products and packaging such as metals, wood, paper or pulp, and biodegradable plastics². The diversity of biodegradable materials and their varying properties makes it difficult to make simple, generic assessments such as biodegradable products are all good or petrochemical-based products are all bad. Attributes like biodegradability of a given polymer need to be effectively coupled with appropriate waste management in order to capture maximum environmental benefit¹. Therefore, the key to an effective campaign is to provide a range of science-based alternatives that meet the needs of the end user, have been proven to be environmentally sound, and are economically feasible. Reclamation will use the data collected as part of this effort to research possible alternative products and provide a comparative analysis. This cost-benefit analysis will include the negative impacts and potential benefits for the whole life cycle of the packing materials, types of products currently available, and the relative costs for each of the alternatives. Waste management considerations will also be included when applicable. The information will be provided to managers, purchase card holders, and managing partners to aid in selecting the products that best suit their individual needs.

6. Opportunities to Shift Public Behavior to Reduce Single-use Plastics

Bringing awareness of SUP product reduction to Reclamation employees and the public will require a thoughtful and effective communications plan that describes goals and amplifies existing policies and actions already taking place across Reclamation. Identifying the agency's plastic footprint will be the first critical step in determining the opportunities for plastics reduction initiatives and information/education campaigns. Sections 2 and 3 above cover the preliminary data collection activities in more depth. In addition, Reclamation will obtain regional inventory information on water bottle refill stations and water fountains at buildings and recreation facilities. After determining the top sources of SUPs in the agency and the solid waste stream, and creating the agency's reduction goals and metrics, Reclamation will develop a communications plan and educational campaign for all buildings, recreation areas, and visitor centers managed by Reclamation and the agency's partners.

The communications plan will focus on raising awareness of Reclamation's goals and SUP alternatives and outline specific actions individuals can take to reduce their own plastic consumption. The SPP plan will include the potential installation of more refill stations and water fountains in locations identified by the inventory accounting and data analysis. The communications plan will be developed in collaboration with Reclamation's Public Affairs office using the following key elements: providing accessible information, boosting motivation, and removing barriers. Effective strategies have been used by existing plastics reduction

¹ Song, J.H. et al. 2009 Jul 27; 364(1526): 2127–2139. *Philos Trans R Soc Lond B Biol Sc: Biodegradable and compostable alternatives to conventional plastics.*

² Klingbeil M. 2000. Working document of biodegradable waste management Brussels: European Commission.

initiatives and campaigns such as customizing approaches and empowering people with specific actions. Reclamation will also build on and adapt other initiatives and campaigns developed by other agencies within the Department of the Interior, like to the US Environmental Protection Agency's Marine Debris and Plastic Reduction Toolkit for Colleges and Universities. These types of campaigns along with the SPP, will aid in structuring Reclamation's outreach and education campaigns.

7. Single-use Plastic Short-term Exemptions if No Alternatives Currently Exist

Following contract reviews and procurement analyses, Reclamation will determine if any Single-Use Plastic Short-Term Exemptions need to be provided, according to contract terms, if no alternatives currently exist to immediately replace them. As a part of determining short-term exemptions in the future, Reclamation will develop a set of criteria for which short-term use of SUPs are appropriate and allowed for a set amount of time. Doing so will allow Regional and Area Offices and facilities time to transition from SUPs to recommended alternatives and will allow existing contractors to make appropriate updates to switch from SUP products to sustainable alternatives at the end of a contract's term. Establishing this threshold ensures that SUPs are not reintegrated into normal operations and alternatives are adopted long-term. To support the phase-out goal, Reclamation will trend toward approving fewer exemptions over time.

8. Exemptions for Medical, Public Safety, Public Health, or Scientific Items

Reclamation staff conducts research and testing in labs and in the field; therefore, certain materials and testing tools will either be exempt or not fall under the definition of SUPs as defined in SO 3407. Environmental field sampling equipment and laboratory testing tools such as plastic sampling containers, plastic sampling scoops, plastic tubing, gloves, and other items are needed for environmental field sampling and performing laboratory experiments. Most of these items must be certified clean before use to prevent cross-contamination when sampling multiple locations or performing laboratory tests. Use of SUP items for lab and field work keeps sampling cost down, as decontamination of equipment after each use would generate more waste and require additional time. Reclamation will consolidate a list of all items and materials used in labs and in the field that will be exempt and distribute that information to facilities as needed.

Public health and safety exemptions for SUPs will include any bottled water used during geological, survey, or engineering field work when outdoors and significantly far from potable drinking water. According to the Occupational Safety and Health Administration (OSHA) and the Reclamation Safety and Health Standards (RSHA), Reclamation is required to supply water to its employees exposed to the elements as described below:

- OSHA: 29 CFR 1926.51(a)(1): An adequate supply of potable water shall be provided in

all places of employment.

- RSHS Section 45.7.2 Hydration for Employees Working in the Field Year-Round and Particularly When Exposed to the Elements (i.e., heat): The first-line supervisor shall ensure employees have access to cool potable drinking water near their work area(s) and encourage them to drink an adequate quantity to remain sufficiently hydrated.

Reclamation may be able to phase out plastic water bottles in a way that aligns with the above policies if a safe, portable alternative exists that is suitable for the work being conducted. There is potential to replace water bottles with alternative water-carrying methods or use of alternative bottles such as aluminum/cardboard bottles or large coolers.

9. Funding Requests

Reclamation's SPP includes actions to phase out SUPs, and a funding narrative and proposal will be submitted to Reclamation's Budget Review Committee to fund Bureau-wide implementation upon completion of this plan and future stages of implementation.