

# **Bureau of Land Management Sustainable Procurement Plan -Reducing Plastic Pollution 2023**

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## **1. Executive Summary**

The plan outlines what the Bureau of Land Management (BLM) will do to meet the goals outlined in Secretary Order No. 3407, including establishing a committee to collect data to identify current single-use plastic behavior, developing practices and policy changes needed to minimize single-use plastic consumption, and monitoring actions put in place.

Under this procurement plan, 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.

The BLM has outlined a phased approach to reducing single-use plastics. This phased approach is in line with the S.O. 3407 guidance. First, the BLM will establish a national committee to support the initiative to reduce single-use plastics and begin collecting relevant data in FY 2023. Then, the committee will analyze the data starting in FY 2024, followed by developing practices and policies that will govern the use and reduction of single-use plastics. After analysis of data, the committee will select a few locations to pilot implementation of the reduction in single-use plastic program. Implementation of policy to all BLM States/Centers/locations will commence in FY 2025 with full phase out of reduction of single-use plastics by FY 2027, eliminating the procurement, sale, and distribution of single-use plastics no later than FY 2032.

The BLM's mission is to sustain the health, diversity, and productivity of public lands for use and enjoyment of present and future generations. There may be many current uses of plastic products to support activities from fire suppression to cleaning facilities. Given the nature of some of the uses of single-use plastics and how they relate to the BLM's mission, exemptions may be allowed if a viable alternative is not available.

The BLM committee will use available tools to determine the current usage as well as to monitor future usage. Additional data will be collected through data calls from State and Center Offices. Contract reviews will be inclusive of all services and supplies to ensure all potential single-use plastic requirements are addressed.

#### 2. Schedules and Annual Targets

The BLM will use a phased approach to address the reduction of procurement, sale, and distribution of single-use plastic products in contracts and purchases. A phased approach will help inform an accurate understanding of the current use of single-use plastics. The BLM will incorporate employee education into all three phases outlined below.

Phase I

The BLM will establish a national committee to support Secretarial Order No. 3407 prioritizing the reduction of single-use plastic. A data call will be sent no later than June 15, 2023, to all Associate State Directors and Centers requesting two points of contact to dedicate their participation in this committee. The BLM reduction in single-use plastic committee will have a kick-off meeting no later than June 30, 2023. Then, the committee

will focus on data collection to identify the BLM's current use of single-use plastics using the following methods: 1) Review BLM contracts and procurements for supplies and services; 2) Data collection from State and Center offices within BLM; and 3) Compile data to support Phase II analysis. The data call will be sent by one of the two State/Center Committee Points of Contact to their respective locations requesting data no later than August 1, 2023. Phase I is anticipated to be completed by the end of FY 2023.

#### Phase II

The BLM will analyze the findings from Phase I. Once the BLM's current single-use plastics usage is identified for each State/Center location, research will be conducted to identify alternatives to single-use plastic products. Targeted strategies will be developed to address reduction of the BLM's procurement, sale, and distribution of single-use plastics sources. Based on the results of the data call, the BLM committee will select various pilot locations to implement the single-use plastic phase out. This phase is anticipated to be completed between FY 2024 and FY 2025.

#### Phase III

The final phase will involve developing an implementation, monitoring, and surveillance plan. The BLM will begin to phase out single-use plastic products by 2032, consistent with SO 3407. This phase is anticipated to begin in FY 2026 with completion no later than FY 2032. Monitoring and surveillance will commence in 2027 ensuring compliance with the SO 3407 goal.

### **3. Updates to Acquisition and Procurement Policies and Practices**

- A. Contracts The BLM committee will update its market research and acquisition planning templates to include analysis of single-use plastics in contemplated contracts. Additionally, BLM will establish a local contract clause to address reduction of single use plastic in contract performance. This clause will be mandatory for inclusion in all solicitations and resulting contracts.
- B. Micro-purchases The BLM committee will update the Government Purchase Card Manual, MS-1512, Charge Cards and Convenience Checks for Travel, Purchase, Fleet, and Uniforms to address policies and procedures to maximize reduction of single-use plastic products. This manual can be found on the BLM website (<u>https://www.blm.gov/policy/manuals</u>). The manual will be revised under the Purchase Business Line Section adding single-use plastic as an unauthorized purchase, unless a valid exemption applies.
- C. Instruction Memorandum The BLM committee will establish an instruction manual in compliance with Department of Interior, Acquisition, Arts, and Asset Policy (DOI-AAAP)-0181 as it relates to reduction of single-use plastics. The instruction memorandum will address policies and procedures to ensure use of single-source plastics are eliminated to the maximum extent practicable.

- D. Training The BLM will provide employee training on how to eliminate single-use plastics within the workplace. Additionally, role/responsibility specific training will be provided to contracting professionals, charge card holders and fire suppression support employees to ensure purchases comply with Secretary Order No. 3407. After the BLM committee is established, data collections have been analyzed, and alternatives are identified the committee will create mandatory training for all BLM employees. The training will educate employees of harmful effects on both human health and the environment. The training will address types of single-use plastic, potential mitigations, and alternatives to help reduce single-use plastic in the office and personal environments.
- E. Policy and training materials will be completed by the end of FY 2025.

# 4. Data Collection Methods, Metrics, and Reporting Requirements

- A. Contracts The BLM committee will review current contracts to identify those purchasing single-use plastics. To ensure accuracy of information the data will be provided via a data call to each State/Center Acquisition Office. Upon completion of data collection and analysis, the BLM committee will require internal reporting on new contract requests requiring single-use plastics on an annual basis.
- B. Micro-purchases The BLM committee will obtain data from Government Purchase Card holders on current/recent purchases of single-use plastics. Additionally, the BLM will monitor future purchases on an annual basis to ensure compliance with Security Order No. 3407.
- C. Other The BLM will perform research to determine whether additional data is available from existing reporting sources to assist in determining current single-use plastic sources.
- D. Shared Facilities The data call will request identifying cooperative opportunities in co-located areas with other agencies, e.g., visitor centers with other bureaus, agencies, and locations. to work together on developing policies/language to include in agreements on reducing single use plastic.

#### 5. Analysis of Alternatives to Single-Use Plastic Products

As the BLM gains a better understanding of its single-use plastic consumption, it will work to identify substitute products or processes analyzing alternative products, such as compostable or biodegradable materials, or 100 percent recyclable or 100 percent recycled materials (with a circular economy plan), as defined in Section 2 of the Save Our Seas 2.0 Act (Public Law 116-224). In addition, the BLM will use the Environmental Protection Agency (EPA)'s Non-Hazardous Materials and Waste Management Hierarchy

to help determine the best alternative for single-use plastics, when available. If there are no suitable alternatives, an exemption may be sought. Section 7 of this plan contains information regarding the exemption process.

# 6. Opportunities to Shift Public Behavior to Reduce Single-Use Plastic Products

The BLM will engage with internal and external programs aiming at shifting behavior to reduce the use of single-use plastic products. First and foremost, the BLM will lead by example and eliminate single-use plastics from internal meetings and gatherings as well as events hosted by BLM by 2025. Below is a list of other activities that have been identified to shift behavior and work toward the goal of eliminating single-use plastic use by 2032:

- The BLM will continue to install re-fillable water stations at public facing and internal locations. In addition, interpretive materials will be added to ensure employees and the public understand the importance and impact of using re-fillable water stations instead of single-use water bottles.
- The BLM will conduct an education campaign for employees on the available alternatives to single-use plastic food service items.
- The BLM will develop and disseminate a fact sheet based on EPA's Non-Hazardous Materials and Waste Management Hierarchy to ensure employees understand how to prioritize alternatives to single-use plastic items.
- The BLM will continue to provide information and educational tools to employees on pollution prevention and recycling, to include single-use plastics. Additionally, the BLM will re-analyze its current recycling programs to ensure reduction of single-use plastics is included in the program.
- Once the BLM has collected and analyzed data to better understand the sources of single-use plastic, additional targeted educational materials will be developed for employees and customers.
- The BLM will address opportunities to educate the public on how to reduce singleuse plastic usage.

# 7. Single-Use Plastic Exemptions

In certain circumstances, the BLM may make exemptions to the phase out of single-use plastic. These exemptions may be for medical, public safety, public health, or scientific items, or for items for which there is proof of a circular economy plan.

Short-term exemptions may be made if no alternative product currently exists. Before short-term exemptions are made, an analysis must be conducted to identify substitute products or processes in the EPA's Non-Hazardous Materials and Waste Management Hierarchy. For exemptions to be granted, requests shall include the steps taken to identify alternatives to existing plastic use.

The BLM will continually seek to shorten the list of exempted product uses.

## 8. Funding Requests

No funding requests are known at this time. Additional funding may be required once more specific solutions are identified during Phase II. The BLM acknowledges that alternatives to traditional plastic products might be more expensive as they initially come to market, but the hope is that, over time, more products will become available, reducing the cost in the longer term.