

## Bureau of Safety and Environmental Enforcement

### **Bureau of Ocean Energy Management**

## 2023 Sustainable Procurement Plan for Single-Use Plastic

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### **1. Executive Summary**

Secretarial Order 3407 prioritizes Departmental action to reduce the amount of plastic waste produced by the Department of the Interior Bureau of Safety and Environmental Enforcement (BSEE) and the Bureau of Ocean Energy Management (BOEM) in support of the goals of Executive Order (EO)14057, entitled "Catalyzing Clean Energy Industries and Jobs through Federal Sustainability," and to further reestablish the Federal Government as a leader in sustainability.

This Order is issued under the authority of section 2 of Reorganization Plan No. 3 of 1950 (64 Stat. 1262), as amended. Other authorities for this Order include, but are not limited to, EO 14057, (December 8, 2021).

Under this Order, 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.

BSEE provides administrative support services for BSEE and BOEM bureaus. These services include space acquisition and utilization, facility management, and environmental management services. BSEE/BOEM is undertaking this effort to comply with these guidelines and as a steward of the environment, to eliminate single use plastic in operations in advance of the established deadlines.

**Identify Roles:** 

- a) Chief Sustainability Officer
- b) Environmental Management Systems Coordinator
- c) Support Services Branch
- d) Acquisition Management Division
- e) BSEE/BOEM Employees

### 2. Schedules and Annual Targets Addressing the Reduction of Procurement, Sale, And Distribution of Single-Use Plastic (SUP) Products

To eliminate SUP from BSEE/BOEM's operations the following steps are needed to determine the scope and level of effort needed.

- a) Phase 1 Evaluation (Due for completion by 9/30/2024):
  - i) Determine the SUP in BSEE/BOEM operations by conducting the following environmental audits and then developing reduction or elimination plans accordingly.
    - (1) Acquisition Management Division to perform a review of purchasing vehicles that may be used to introduce SUPs into BSEE/BOEM operations.
      - (a) Evaluate current contracts and procurements to identify any procurements that include SUPs.
      - (b) Evaluate Credit Card purchases to identify any procurements that include SUPs
    - (2) The Support Services Branch to perform a review of facility operations to determine whether SUP are used in daily business operations.
      - (a) Review concessionaires' operations.
      - (b) Review cleaning protocols.

- (c) Review protocols and purchases made for the following building services:
  - (i) Safety, security, facility management, conference/meeting set-up, warehouse management, property management
- (3) Elimination and Reduction
  - (a) Following AMD's review of purchasing vehicles used to introduce SUPs into BSEE/BOEM operations, AMD will submit recommendations to the Associate Director for Administration on how procedures can be updated or changed to reduce or eliminate SUPs from future purchases.
  - (b) Following SSB review of facilities operations and if SUPs are used in daily operations, SSB will submit recommendations to the Associate Director for Administration on how procedures can be updated or changed to reduce or eliminate SUPs being used or purchased in the future.
- b) Phase 2 Execution (Due for completion by 9/30/2025)
  - i) Using the reduction and elimination plans developed in Phase 1. To be developed based on the findings in phase 1.

### **3. Acquisition Policies and Practices**

In order to ensure that procurement policies and procedures support reducing the purchase and use of SUP's, the Acquisition Management Division will:

- a) Review current acquisition policies and procedures and update as needed to support reducing the purchase of SUP's. (Due for completion by 9/30/2024)
- b) Implement a new process for screening requisitions and supporting documents for SUP purchases during the initial review of the procurement package. (Due for completion by 9/30/2024)
- c) Train Contracting Officers (CO) on how to screen requisitions for SUP requirements and the process for coordinating alternatives with the program office. (Due for completion by 9/30/2024)

# 4. Data collection methods, metrics, and reporting requirements to reflect the specific approaches proposed to phase out single- use plastics by the end of 2032

To effectively evaluate the purchase and use of SUP in BSEE/BOEM operations, the following tools and reviews will be conducted:

- a) Annual review of procurements and purchase card transactions: BSEE's procurements include contracts, interagency agreements, and cooperative agreements including various types of actions (i.e., firm fixed price, time-and-material, cost reimbursement, etc.) for purchases of goods, services, scientific studies, etc.
  - i) Annually, BSEE AMD will perform an audit of their procurement actions to determine if any SUP were purchased.
  - ii) Annual review of SUP waiver requests to determine if the SUPs are still necessary, or if alternative products that can effectively replace the SUP are available.
- b) Annual review of concessionaires to determine if products with SUP packaging are being sold.

c) The results from the Annual review will be collected and given to the Chief Sustainability Officer in the annual report from the Acquisitions team.

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

Upon completion of the Acquisitions review and their submittal of their findings, there will be an analysis of possible alternatives to SUP products. This analysis will include 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 <u>Save Our Seas 2.0 Act</u> (Public Law 116-224).

BSEE/BOEM will continue to work with the DOI Community of Plastics cross-functional team to identify appropriate alternatives.

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

BSEE/BOEM will identify opportunities to shift public behavior in the purchase and use of SUP products brought into the workplace.

Outreach and Education:

- a) Communication:
  - Email. Regular emails will be sent to all employees concerning the new policies on the purchase and use of single use plastic within BSEE/BOEM leased facilities. These emails may contain information on alternative products or the adverse effects of SUP on the environment.
  - ii) Digital Signage. Information provided via the regular emails will also be shown on the digital signage (where available) located in common areas.
  - iii) Internal BSEE/BOEM Website. Using the eAdmin and Currents website to provide timely articles and weblinks and references to additional information concerning SUP.
- b) Influence:
  - i) Encourage building owners/lessors to install water bottle refill stations.
  - ii) Encourage building owners/lessors to use an appropriate alternative for collecting office waste.
- c) Training:
  - i) Provide annual training to purchase card holders to remind and discourage the purchase of SUPs and to encourage seeking alternatives. (Due for completion by 9/30/2024)

### 7. Single-Use Plastic Short-Term Exemptions if No Alternatives Currently Exist

If a SUP is needed in a procurement contract or credit card purchase to fulfill a mission requirement, then a justification request will be submitted to be reviewed and evaluated by the Associate Director for Administration. The new justification will be re-evaluated and may be revoked if an alternative becomes available.

Currently, BSEE/BOEM has one standing emergency exemption for Continuity of Operations Program (COOP) members with purchasing authority.

- a) Emergency Exemptions
  - i) COOP
    - (1) When COOP is activated, an automatic exemption goes into effect.
      - (a) COOP members that have purchase card authority do not need pre-approval during a COOP event.
      - (b) The COOP member that made any purchases of SUPs during the event must report within 30 days of the purchase to provide a detailed report to the Associate Director for Administration.
        - (i) The report must include the following:
          - 1. When the event happened
          - 2. What SUPs were purchased
          - 3. Who purchased the SUP items
          - 4. Where they were used
          - 5. Disposal status of the SUPs

## 8. Single-Use Plastic Exemptions for Medical, Public Safety, Public Health, Or Scientific Items

If an exemption is needed for medical, public safety, public health, scientific items, or for items for which there is proof of a circular economy plan, then a justification must be submitted. The Associate Director for Administration or designated official will review the justification and approve or reject the exemption for use of SUP.

#### 9. Funding Requests

If additional funding is required to make a change to existing agreements or future acquisitions the Associate Director for Administration or designated official will review the justification and approve or reject the request for additional funding to purchase alternatives or products that have proof of a circular economy plan.