

U.S. Fish and Wildlife Service Sustainable Procurement Plan June 2023

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1. Executive Summary

This plan outlines how the U.S. Fish and Wildlife Service (Service) will collect data to identify current single-use plastic behavior, develop practices and policy changes needed to minimize its single-use plastic usage, and meet the goals outlined in Secretary Order 3407.

The Service intends to take a phased approach to reducing single-use plastics. A phased approach is necessary because the Service does not currently have the data needed to form a comprehensive picture of its single-use plastic behaviors to allow for implementation of practices and policies to meet the goals of Secretary Order 3407. The Service will begin by collecting relevant data in Fiscal Year (FY) 2023 and FY 2024; then analyzing the data and developing practices, policies, and educational tools that need to be implemented; and finally beginning the full phase out of single-use plastics no later than FY 2027, allowing for eliminating the procurement, sale, and distribution of single-use plastics by 2032.

The Service is a science-based conservation agency. As such, it is anticipated that a large portion of its single-use plastics are employed in scientific investigations, fish rearing, and other laboratory- or field-based activities. Other areas of utilization of single-use plastics may include cleaning/janitorial activities, meetings or events, and limited food service by outside organizations such as Friends groups and partners. The Service has a small number of food service concessions, fewer than five out of a dozen total concessions, which may currently involve single-use plastics.

Given the nature of some of the uses of single-use plastics and how they relate to the Service's mission, exemptions will be allowed if a viable alternative is not available. The Service is committed to reducing the number of exemptions in place as additional products or processes become available.

Based on the data currently available, it appears a significant portion of the Service's single-use plastics are procured through micropurchases. The Service will employ available tools both to determine the current usage as well as to monitor future usage. However, given the limitation of these tools to identify all single-use plastic purchases, a major focus of the Service's plan will be employee education.

2. Schedules and Annual Targets

The Service will use a phased approach to address the reduction of procurement, sale, and distribution of single-use plastic products in contracts, purchases, and concessions. A phased approach is needed to ensure there is an accurate understanding of the current use of single-use plastics to develop targeted approaches to comply with the Secretary Order 3407 that do not have a negative impact on the Service's ability to meet its mission. The Service will incorporate employee education into all three phases outlined below.

Phase one will focus on data collection, with an increased emphasis to contractors, partners, and all concessionaires on the importance of reducing single-use plastics. This phase is anticipated to be completed from FY 2023 to FY 2024. In FY 2023, the Service will form a working group with representatives from various programs to ensure the agency is taking a comprehensive approach its efforts to eliminate single use plastic. The Service is revising its concessions policy and as of 2023, new concession contracts will include language regulating single use plastics. It is anticipated there will be two concession contracts that include the new single use plastic restrictions issued by the end of FY 2024. As an initial target, the Service will eliminate sales of single-use plastic bottles at 25% of National Wildlife Refuges and National Fish Hatcheries visitor centers by the end of 2024.

In phase two, the Service will analyze the findings from phase one. The Service will develop and test targeted strategies to address the sources of single-use plastics in Service contracts, micropurchases, partnerships, and concessions. This phase is anticipated to be completed by the end of FY 2026.

Phase three will be a full phase out of single-use plastic products to meet the 2032 goal. This phase is anticipated to run from FY 2027 to FY 2032. Interim targets for phase three may be developed after the phase one data is collected and analyzed. The dates in the timeline are intended to serve as deadlines, and the Service will work to implement actions sooner where possible.

3. Updates to Acquisition and Procurement Policies and Practices

- a. Contracts. The Service will update its contract request and administration program to track the initiation of all contracts where single-use plastics are anticipated. The Service will update its mandatory market research templates to include analysis of single-use plastics in contemplated contracts.
- b. Micropurchases. The Service will develop a reporting schedule to utilize available Departmental systems such as VisaIntellilink and CitiManager as well as data provided through its Amazon Business account to identify single-use plastic purchases. Charge Card websites will also link to or include any future guidance on single-use plastic purchases to include exemptions or recommended alternatives for current plastic goods.
- c. Concessions. The Service is revising its concession policy (630 FW 6-8) in 2023 and will incorporate the removal of single-use plastics into the new policy for all concession operations.

4. Data Collection Methods, Metrics, and Reporting Requirements

a. Contracts. The Service will begin internal reporting on contract requests that include single-use plastics on a quarterly basis once the contract request and administration

program has been updated. The Service intends to begin internal reporting on new contract awards associated with single-use plastics on a semi-annual basis starting in October 2024. Additional reporting functions and milestones may become available at a later date.

- b. Micropurchases. The Service will develop a reporting schedule to utilize available Departmental systems such as VisaIntellilink and Citimanger as well as data provided through its Amazon Business account to identify single-use plastic purchases both to determine the current usage as well as to monitor future usage. This information will be provided to those tasked with leading the single-use plastic reduction efforts and whomever will be responsible for educating Service employees on single-use plastics. Additional reporting functions may be available at a later date.
- c. Other. The Service will use data available from existing reporting sources, such as the Solid Waste Data Management Report, to help inform its understanding of single-use plastic sources and monitor future usage.

5. Analysis of Alternatives to Single-Use Plastic Products

As the Service gains a better understanding of its single-use plastic consumption, it will work to identify substitute products or processes by analyzing alternative products, such as compostable or biodegradable materials, or 100 percent recyclable or 100 percent recycled materials as defined in Section 2 of the Save Our Seas 2.0 Act (Public Law 116-224). In addition, the Service 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 no suitable alternative exists, an exemption can be sought. Section 8 of this plan has information about the exemption process.

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

The Service will engage in internal and external programs aiming at shifting employee and visitor behavior to reduce the use of single-use plastic products. First and foremost, the Service will lead by example and eliminate single-use plastics from internal meetings and gatherings as well as events hosted by the Service 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 Service will continue to install re-fillable water stations at public facing and internal locations. In addition, the Service will include educational materials at appropriate locations to ensure employees and the public understand the importance and impact of using re-fillable water stations rather than single-use water bottles.
- The Service will conduct an education campaign for employees on the available alternatives to single-use plastic food service items for meetings and special events.

- The Service will develop and disseminate a fact sheet on EPA's Non-Hazardous Materials and Waste Management Hierarchy to ensure employees understand how to prioritize evaluation of alternatives to single-use plastic items.
- The Service will continue to provide information and educational tools to employees on pollution prevention and recycling, which includes single-use plastics.
- Once the Service has collected and analyzed data to have a better understanding of the sources of single-use plastic, additional targeted educational materials will be developed for employees if needed.

7. Communication Strategy

The Service will employ communication initiatives to ensure employees are aware of Secretary Order 3407 and the Service's plan to eliminate single-use plastic. Any external communication will be coordinated through the Service's Office of Communication at the relevant time. The Service's internal communication initiatives are described below:

- A SharePoint site will be developed in 2023 to serve as the primary communication tool for employees to keep up with the Service's efforts to eliminate single-use plastics. The SharePoint site will serve as a place for employees to stay up to date on ongoing initiatives, policy changes, educational resources, and to celebrate best practices and successes across the Service.
- Beginning in 2024, the Service will highlight success stories from field stations in Wild Weekly a minimum of three times a year.

8. Single-Use Plastic Exemptions

The Service may make exemptions to the phase out of single-use plastic in certain circumstances. Exemptions may be made, if necessary, for medical, public safety, public health, and 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.

Short-term exemptions may be made for the term of an existing contract if the contract cannot be modified. However, efforts should be made to modify the contracted activity as feasible.

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

9. Funding Requests

No funding requests are known at this time. Additional funding may be required once more specific solutions are identified during phase two.