

June 21, 2024

National Park System Advisory Board
Department of the Interior, Room 5160
1849 C Street NW
Washington, DC 20240

Re: National Park Service Single-Use Plastic Reduction

Thank you for the opportunity to provide public comment. Oceana is the largest international advocacy organization dedicated solely to ocean conservation.

Plastic pollution is a growing threat to the world's oceans, as well as our food, health, and climate. Each year, an estimated 33 billion pounds of plastic enter the marine environment. This amount is roughly equivalent to dumping two garbage trucks full of plastic into the ocean every minute. Freshwater lakes also suffer from plastic pollution. The Great Lakes, for example, are flooded with 22 million pounds of plastic annually.

Each year, millions of people visit our treasured parks for their natural beauty, history, and culture. Plastic pollution mars that experience, polluting the landscape and harming wildlife. In 2015, just three national parks, Denali, Grand Teton, and Yosemite, generated 17 million pounds of plastic waste. During the recent Advisory Board meeting, participants discussed the importance of expanding stewardship and responsible tourism as the National Park Service works to designate and preserve national landmarks. Protecting these places from the harms of single-use plastic is essential.

President Biden's Executive Order 14057 called on federal agencies to take actions to reduce and phase out procurement of single-use plastic products to the maximum extent practicable. Following this Order and Secretary of the Interior Haaland's Secretarial Order 3407, in September 2023, the Department of the Interior [announced](#) that all bureaus, including the National Park Service, finalized plans to phase out the sale and distribution of single-use plastics on public lands by 2032. We applaud the Service's commitment to phase out single-use plastic products. Actions to phase out single-use plastics and move to refill and reuse systems, including water bottle refilling stations, will have a meaningful impact on our oceans, wildlife, and climate.

We are encouraged by this commitment, and we believe it is possible for the National Park Service to move more quickly. For example, on Earth Day, the South Carolina State Park Service announced it would eliminate single-use plastic bags and water bottles from all park retail stores. This change will be complete in the coming months. We urge the National Park Service to immediately phase out the most problematic plastics, including plastic foam foodware and plastic bags. Single-use plastics have no place on our public lands.

I am attaching several letters that Oceana and its allies sent to the Department of the Interior on this topic. The first is a 2021 letter asking the Service to eliminate plastic from parks, the second a 2022 letter thanking Interior Secretary Haaland for Secretarial Order No. 3407, and finally a 2023 letter urging Secretary Haaland to publicly release the plans and related recommendations.

Thank you for your consideration.

Taylor Mann
Federal Policy Manager

July 22, 2021

The Honorable Deb Haaland
Secretary of the Interior
Department of the Interior
1849 C Street, N.W.
Washington, DC 20240

Dear Secretary Haaland:

Congratulations on your historic confirmation as the first Native American to lead the Department of the Interior. Encouraged by your strong record as an environmental leader, we are approaching you on an issue of growing public concern: plastic pollution.

We, the undersigned, strongly request that you direct the National Park Service (NPS) to eliminate the sale or distribution of single-use plastics in our national parks, building on the Green Parks Planⁱ and previous efforts to reduce the sale of bottled water in parksⁱⁱ and ensure access to safe, potable water. Eliminating single-use plastics will reduce plastic pollution and save money for parks, visitors, concessionaires and park partners, while also advancing the Biden administration's goals for addressing environmental justice and the climate crisis. This request is consistent with the Presidential Plastics Action Planⁱⁱⁱ delivered to the Biden-Harris transition team and Congress on December 8, 2020, which highlights eight executive actions to address the plastic pollution crisis.

By reducing single-use plastics, NPS will contribute to the Biden administration's commitment on environmental justice "to hold polluters accountable, including those who disproportionately harm communities of color and low-income communities."^{iv} Petrochemical facilities, and disposal of the plastics that they create, disproportionately harm people of color and low-income communities.^v Continued efforts by industry to site new plastics facilities in "Cancer Alley" in Louisiana provide a stark case of environmental racism.^{vi} Extensive research has shown that incinerators and landfills are more often sited in frontline communities.^{vii} **The best way to manage plastic waste is to stop generating it.**

The earth is awash in plastic pollution. Plastic has been found everywhere, from the deep ocean^{viii} to remote mountains,^{ix} in the rain in our national parks and wilderness areas^x and in our food.^{xi} Globally, humanity produces about 300 million metric tons of plastic waste each year.^{xii} An estimated 15 million metric tons (33 billion pounds) of that plastic enter the ocean each year,^{xiii} roughly equivalent to dumping two garbage trucks full of plastic into the ocean every minute. Plastics are affecting every form of marine life from zooplankton and fish to sea turtles and seabirds, and they pose significant health concerns.^{xiv} It is estimated that the average person is eating a credit card's worth of microplastic every week with unforeseeable consequences to development, disease, fertility and beyond.^{xv}

Nearly 40% of the plastic produced annually is for single-use plastics and packaging^{xvi}—materials that are made to last forever but designed to be used briefly and thrown away. Plastic production is projected to quadruple between 2014 and 2050,^{xvii} greatly compounding the problem since a meager 9% of all the plastic waste ever generated has been recycled.^{xviii} Plastic water bottles are considered more recyclable than some other plastic products, yet three out of four bottles end up in landfills or incinerators.^{xix} We cannot recycle our way out of this problem. We must reduce the production and use of single-use plastics; our parks and communities depend on it.

Plastic pollution, from tiny microplastics to plastic bottles to larger plastic debris, is polluting our national parks. Plastic trash is often visible in parks, impairing visitors' experiences of these treasured natural and historical sites. Plastic harms wildlife and ecosystems, from horrific entanglements of large animals like sea turtles and whales^{xx} to impairment of microscopic organisms in soil.^{xxi} This plastic makes its way into our air, food, and drinking water, most directly when leaching into water we drink from plastic water bottles.^{xxii}

Plastics are also fueling the climate crisis, a critical problem that presents NPS with extraordinary adaptation challenges.^{xxiii} Most plastics are made from petrochemicals derived from fossil fuels, which of course are the main drivers of climate change. If plastic were a country, it would be the fifth-largest emitter of greenhouse gases.^{xxiv,xxv} As our economy shifts toward clean energy resources, oil and gas companies are turning to plastic production as the next growth area for their industries. Petrochemical production is expected to account for over a third of global growth of fossil fuel demand by 2030, and nearly half by 2050—more than trucks, aviation and shipping combined.^{xxvi} Furthermore, studies show that plastic contributes to climate change at every stage of its life cycle.^{xxvii}

On average, the NPS manages nearly 70 million pounds of waste annually, equivalent to the weight of 155 Statues of Liberty. If you include waste managed by park concessionaires, that number more than doubles.^{xxviii} Plastic waste—such as water bottles, plastic bags, and non-recyclable or compostable food packaging—is a significant source of landfilled waste from parks. NPS staff and volunteers spend considerable time and expense cleaning up litter and hauling waste to landfills.^{xxix} In Yellowstone National Park, a 2013 review found that plastic water bottles represent 50% of the park's solid waste load.^{xxx} A 2016 survey found that more than one-third of park visitors (35%) use disposable water bottles, yet nearly four out of five visitors (79%) would support removing single-use bottles in parks to help reduce waste.^{xxxi}

We recommend eliminating the sale in national parks of single-use plastic beverage bottles; plastic bags; disposable plastic foodware, including cups, plates, bowls, and utensils; and expanded polystyrene products. Reusable water bottles that cost less than a dollar each can be readily purchased and refilled at water fountains or refill stations,^{xxxii} reducing plastic pollution and saving consumers money.

We acknowledge that the lands in today's national parks were once home to Native People who stewarded these lands for many generations.^{xxxiii} Native People were driven from these lands, in some cases specifically to convert the lands to national parks.^{xxxiv} We seek to honor their

stewardship by eliminating plastic pollution from these parks, and we are collaborating with local and native communities at every stage of this effort.

The national parks are an obvious leader in the movement towards a regenerative and inclusive future. We cherish these special places and hope to share this appreciation with countless generations to come. We are confident that ending the sale of single-use plastics in our national parks will benefit park visitors, park budgets, and park ecosystems, as well as contribute to the Biden administration's larger goals on environmental justice and the climate crisis. Thank you for considering our views, and we look forward to discussing this proposal with you and NPS leadership.

Sincerely,

1 STEP

100 Grannies for a Livable Future

350 Maine

350 Seattle

350Brooklyn

5 Gyres Institute

7th Generation Advisors

A Healthy Blueprint

Active San Gabriel Valley (ActiveSGV)

Alaska Clean Water Advocacy

Alaska Wilderness League Action

Alaska's Big Village Network

Algalita

all good goods

Alliance of Mission-Based Recyclers

American Littoral Society

American Sustainable Business Council

Animal Welfare Institute

Apalachicola Riverkeeper

Aquatics for Life

Arizona PIRG

Arroyo Vista Village

Atchafalaya Basinkeeper

Athens ReThinks Plastics

Aurorans for Climate and Environmental Sense (ACES)

AWAREHAUS

Azul

BAN SUP

Basel Action Network

Beaver County Marcellus Awareness Community (BCMAC)

Beyond Plastics

Black Warrior Riverkeeper

Blue Horizon Group

Boomerang Coffee LLC

Boulder Clean

BRINGiT For a Better Planet
Broad Riverkeeper
BYOBottle
California Interfaith Power & Light
CalPIRG
Cape Fear River Watch
Capital Region Interfaith Creation Care Coalition
Casselwood, LLC
Center for Biological Diversity
Center for Coalfield Justice
Center for International Environmental Law
Cetacean Society International
Charleston Waterkeeper
Church Women United in New York State
City of Boynton Beach Sustainability Action Team
Clean Fairfax Council
Clean Water Action
Climate Action Alliance of the Valley
Colorado Ocean Coalition
Colorbrightongreen
Communities First Sewickley Valley
Concerned Healthcare Professionals of Pennsylvania
Congaree Riverkeeper
ConnPIRG
Conscious Fashion Campaign
CoPIRG
Corporate Accountability
Cup Zero Inc.
Defenders of Wildlife
Delray Beach Historical Society
Don't Waste Durham
Dr. Meghnad N. Saha Science Club
Earth & Me
Earth Day Every Day of Harrisonburg VA
Earth Island Institute
Earth Law Center
Earthbilt
EARTHDAY.ORG
EarthEcho International
Earthjustice
Earthworks
Eastern Surfing Association
Eco Maniac Company
Effect Partners
Ekosfere LLC
Elders Climate Action
Endangered Species Coalition
Environment America
Environment Arizona

Environment California
Environment Colorado
Environment Connecticut
Environment Florida
Environment Georgia
Environment Illinois
Environment Iowa
Environment Massachusetts
Environment Maryland
Environment Michigan
Environment Minnesota
Environment Missouri
Environment Montana
Environment North Carolina
Environment New Hampshire
Environment New Jersey
Environment New Mexico
Environment New York
Environment Nevada
Environment Ohio
Environment Oregon
Environment Rhode Island
Environment Texas
Environment Virginia
Environment Washington
Environmental Action
Environmental Action Coalition
Environmental Defense Center
Environmental Law & Policy Center
Everyday Earth Energy
Extinction Rebellion Pittsburgh
Fight Dirty Tybee
Florida PIRG
Food & Water Watch
Fourth Universalist Environmental Justice Team
FracTracker Alliance
Friends of the Earth
Friends of the Great Dismal Swamp National Wildlife Refuge
Friends of the San Juans
Gas Free Seneca
Georgia PIRG
Glacier Technology, Inc.
Global Alliance for Incinerator Alternatives
Global Movement for Myanmar Democracy
Grades of Green
Grassroots Environmental Education
Greater Cincinnati Earth Coalition
Green Schools Alliance
GreenLatinos

Greenpeace USA
Hands Across the Sand
Hannah4Change
Healthy Ocean Coalition
Heirs To Our Oceans
Highland Heights Green Task Force
Hobie Sports
Hudson River Sloop Clearwater
Hudson Riverkeeper
Humane Action Pittsburgh
Illinois PIRG
Inland Empire Waterkeeper
Inland Ocean Coalition
Inland Ocean Coalition Alaska Chapter
Inland Ocean Coalition Arizona Chapter
Inland Ocean Coalition Buffalo, NY Chapter
Inland Ocean Coalition Central Texas Chapter
Inland Ocean Coalition CSU Fort Collins Chapter
Inland Ocean Coalition CU Boulder Chapter
Inland Ocean Coalition Great Lakes Chapter
Inland Ocean Coalition Illinois Chapter
Inland Ocean Coalition Montana Chapter
Inland Ocean Coalition North Texas Chapter
Inland Ocean Coalition University of Michigan Chapter
Inland Ocean Coalition Utah Chapter
Inland Ocean Coalition Washington, D.C. Chapter
Inland Ocean Coalition Wyoming Chapter
International Marine Mammal Project of Earth Island Institute
It's Easy Being Green (IEBG)
Izaak Walton League of America - Allegheny County Pennsylvania Chapter
Jack Johnson
Jamesville Positive Action Committee (JAM-PAC)
Just Salad
Keep Virginia Beautiful
KIDS for the BAY
Kids Think Big
Kim Lewand Martin, LLC
KingstonCitizens.org
Kōkua Hawai'i Foundation
Lake Pend Oreille Waterkeeper
Larson's General
League of Conservation Voters
League of Women Voters of Broward County
Lite Foot Company LLC
Los Angeles Waterkeeper
Maine Conservation Voters
Maine Rivers
Marine Mammal Alliance Nantucket
Maryland PIRG
MASSPIRG
Matanzas Riverkeeper
Mazaska Talks

Milwaukee Riverkeeper
MoPIRG
MountainTrue
Muuse
Nassau Hiking and Outdoor Club
National Aquarium
National Audubon Society
National Ocean Protection Coalition
National Parks Conservation Association
National Stewardship Action Council
National Wildlife Federation
Natural Resources Defense Council (NRDC)
Nature in the City
NCPIRG
News from the Neighborhood
NHPIRG
NJPIRG
NMPIRG
NoPetroPA
NY4WHALES
Ocean Blue Project
Ocean Conservancy
Ocean Conservation Research
Ocean First Divers, LLC
Ocean First Education
Ocean First Institute
Oceana
Oceanic Global
Oceanic Preservation Society
Oceanic Society
Ohio PIRG
Omega Institute for Holistic Studies
One Ocean Media Foundation
Open Water
Orange County Coastkeeper
Orca Network
Organizing for Plastics Alternatives
Our Children Our Earth
Patuxent Conservation Corps, Inc.
Peak Plastic Foundation
PennEnvironment
PennFuture
PennPIRG
People Over Petro Coalition
Permian Gulf Coast Coalition
PIRGIM
Pittsburghers Against Single Use Plastics (PASUP)
Plaine Products
Plastic Free Delaware
Plastic Free MKE
Plastic Pollution Coalition
PlasticScore, Inc.
Prepare with Cher, LLC
Promote PT
Protect Franklin Park
Protect Our Parks (POP)

Public Employees for Environmental Responsibility
Puget Soundkeeper
Putting Down Roots
r.Cup
ReImagine Turtle Creek Watershed & Airshed Communities
Remark
Resource Depot
Reusable Solutions
Rio Grande International Study Center
RIPIRG
River Valley Organizing
Russian Riverkeeper
Sailors for the Sea Powered by Oceana
San Anselmo Climate Action Commission
San Antonio Bay Estuarine Waterkeeper
San Francisco Baykeeper
Sanctuary Education Advisory Specialists (SEAS)
Savannah Riverkeeper
Save Our Shores
Save RGV (Rio Grande Valley)
Save the Bay
Save the Manatee Club
Save the Pine Bush
Sea Hugger
Sea Life Love LLC
Sea of Life
Sea Save Foundation
Sea-Straw, Inc.
SeaSmart
SeaStrawUSA
Seattle Aquarium
Seatuck Environmental Association
Seneca Lake Guardian
Seven Circles Foundation
Shark Stewards
Shedd Aquarium
Shenandoah Green
Sierra Club
Simply Straws
Sisters of Charity Federation
Sisters of Charity of Leavenworth Office of Justice, Peace, and Integrity of Creation
Sisters of Charity of Nazareth Congregational Leadership
Sisters of Charity of Nazareth Western Province Leadership
Society of Native Nations
South Carolina Wildlife Federation
South Shore Audubon Society
Spokane Riverkeeper
Student PIRGs
Surfing Florida Museum
Surfrider Foundation
Sustainable Bainbridge
Sustainable Roanoke
Sustainable Saratoga
Sustainable Sewickley
Sustainable Works
Tennessee Riverkeeper

Tethra Advisors and Officers (TAO)
TexPIRG
The Altai Project
The Azulita Project
The Borneo Project
The Center for Oceanic Awareness, Research, and Education (COARE)
The Climate Reality Project Orange County Chapter
The Climate Reality Project: Capital Region, NY Chapter
The John Muir Project of Earth Island Institute
The Last Beach Cleanup
The Last Plastic Straw
The Moore Charitable Foundation
The Ocean Foundation
The Rachel Carson Council
The Story of Stuff Project
Think Zero LLC
Thrive_At_Life: Working Solutions
Transition South Pasadena
Turtle Island Restoration Network
U.S. PIRG
UNCAGED
Uncommon Goods
United for Action
United Methodist Caretakers of God's Creation
United Methodist Women
Upslope Brewing Company
Vessel Works
Virginia Aquarium & Marine Science Center
Virginia Coastal Alliance
Virginia Conservation Network
Virginia League of Conservation Voters
Viva Sierra Gorda - Earth Island Institute
W2O Women Working for Oceans
WashPIRG
Waterkeeper Alliance
Waterkeepers Chesapeake
WESPAC Foundation, Inc.
Wholly H2O
WILDCOAST
Willamette Riverkeeper
Winyah Rivers Alliance
Wisconsin Environment
WISPIRG
Wood Doing Good
Zero Waste Action - Sonoma County
Zero Waste Company
Zero Waste Hawai'i Island
Zero Waste NYC Workshop
Zero Waste Washington

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August 25, 2022

The Honorable Deb Haaland
Secretary of the Interior
U.S. Department of the Interior
1849 C Street, NW
Washington, D.C. 20240

Dear Secretary Haaland:

Thank you for your bold leadership within the federal government to reduce harmful single-use plastics. We support your Secretarial Order (No. 3407), issued on World Oceans Day, which will phase out the procurement, sale, and distribution of single-use plastic products and packaging across the U.S. Department of the Interior lands and offices by 2032. This historic order establishes the department as a role model for other federal agencies and society at large to take meaningful action and reduce the impacts of plastic pollution in communities and the environment.

While this is a big step forward, we believe that the department can and must do more to turn the tide of this harmful pollutant. With this letter, we provide recommendations to shorten the 10-year timeline, prioritize reuse and refill systems, and caution against bioplastic alternatives. Our coalition has expertise and vendor relationships that could help guide your staff in phasing out single-use plastics. We are offering our support to achieve this worthy goal in the near term and spark the immediate action needed.

As you know, plastic pollution devastates communities, the environment, and the climate. Fenceline communities — particularly Latino/a/x, Black, Indigenous, under-resourced, and/or economically oppressed communities — are disproportionately impacted by plastic production and disposal facilities. These facilities pollute air, water, and soil — and consequently, harm these communities' health. Scientists estimate that 33 billion pounds of plastic wash into the ocean every year.ⁱ Furthermore, the production, consumption, and disposal of plastics generate immense amounts of greenhouse gas emissions, which further endangers frontline communities or those who experience the most immediate and worst consequences of climate change. If we compare global greenhouse gas emissions from plastics to the top polluting countries, plastic ranks as the fifth-highest emitter in the world.^{ii,iii}

Recycling alone will not solve this problem, since less than 6% of U.S. plastic waste is recycled.^{iv} Despite this failure, the plastics industry expects to increase production exponentially, continuing to impact our planet and our communities with devastating consequences. To combat the plastic pollution crisis, we must reduce the production and use of single-use plastics.

As this toxic crisis worsens, the department has no time to waste. We ask that you act as quickly as possible to phase out single-use plastic products and implement most changes by January 2025. Specific actions that shorten the 10-year phaseout include the following:

- Identify and prohibit single-use plastics in all new contracts while taking into account the needs of those with differing abilities or restrictions that require the use of certain single-use plastic items;
- Immediately stop the procurement of expanded polystyrene products;
- Renegotiate existing contracts with concessionaires that use single-use plastic;

- Review purchases that do not require a contract to eliminate single-use plastic products;
- Ensure that all new facilities and facility renovations include drinking refill stations with access to clean water; and
- Swiftly implement a plan to reduce single-use plastic in the Department of the Interior's Washington, D.C., offices and event spaces, which could serve as a model for the rest of the federal government.

We also urge the department to prioritize eliminating the procurement, sale, and distribution of single-use plastics in all 423 national park units while leveraging your considerable purchasing power to push suppliers and manufacturers toward viable alternatives. After a 2011 Obama administration policy went into effect, 23 national parks banned the sale of single-use plastic water bottles, eliminating between 1.3 million and 2 million disposable plastic water bottles and saving up to 111,743 pounds of plastic and 141 metric tons of greenhouse gas emissions.^v Although this policy was unfortunately reversed in 2017 by the Trump administration, your order puts the department on track for even more significant reductions.

Today, many parks and concessionaires are leading the way in reducing single-use plastics, including installing water refill stations, selling reusable bottles and bags, moving to fountain or keg beverages in their restaurants, and offering water packaged in aluminum cans. With the National Park Service and its suppliers hosting more than 300 million visitors each year and managing approximately 70 million tons of trash,^{vi} it is well-positioned to drive meaningful reductions in plastic pollution and educate its visitors on the impacts of single-use plastic.

We are concerned by the mention in your order of bioplastic products as environmentally preferable alternatives to single-use plastic products. While we recognize the complexity of the shift away from single-use plastics that the department is undertaking, "bioplastics" are widely considered among experts in relevant fields as a non-solution that delays the ultimate goal. "Bioplastics" is a broad term that encompasses a wide range of materials, even including those made from a hybrid of renewable biomass and petroleum-based plastic. Many of these options require specific treatments in our waste management systems, yet behave like conventional plastic in the environment, creating confusion with the public and posing the same harmful threats to our communities. The best alternative to harmful plastic products is to use non-toxic reusable or refillable products that can provide the same service without using any disposable material at all.^{vii}

Let's look to our plastic-free past, when refillable and reusable solutions could be used repeatedly to reduce the accumulation of unnecessary waste. Today, the resources are available to make these systems even more convenient for consumers and visitors to public lands. We recommend making inexpensive, American-made reusable water bottles available for purchase from vendors, paired with clear educational materials urging visitors to bring their own bottles and providing free reusable bottles for those who cannot afford them. Concessionaires, food service establishments, and retailers should implement in-store policies to encourage reusable bags and phase out disposable ones (especially plastic). We also recommend that food service establishments and concessionaires use non-toxic reusable cups and tableware in their operations. This approach could also provide an opportunity to create reusable branded products that will increase revenue and visibility over time. Prioritizing refill and reuse solutions over disposable alternatives is the best way to reduce our country's reliance on single-use plastic and can quickly reduce cost.

We collectively applaud you for recognizing the harmful impacts of toxic single-use plastic on our communities, climate, and environment. We look forward to supporting the department to ensure implementation of this order is swift and successful.

Sincerely,

100 Grannies for a Livable Future
1000 Grandmothers for Future Generations
350 Brooklyn
350 Climate Action SoCal
350 Humboldt
350 NYC/WasteNØt
350 Sacramento
350 Seattle
350 Silicon Valley
350 Ventura County Climate Hub
5 Gyres Institute
Active San Gabriel Valley
Alaska Community Action on Toxics
All Our Energy
Anacostia Riverkeeper
Assateague Coastal Trust
Atchafalaya Basinkeeper
Athens ReThink Plastics
AU Environmental Action Coalition
Awarehaus.com
Azul
Ban SUP
Beaver County (PA) Marcellus Awareness Community (BCMAC)
Between the Waters
Beyond Plastics
Big Blue and You
Black Warrior Riverkeeper
Breathe Project
Broward Sierra Group
Brown Girl Surf
Cafeteria Culture
Cahaba Riverkeeper
CALPIRG (California Public Interest Research Group)
CALPIRG Students
Capital Region Interfaith Creation Care Coalition
Center for Biological Diversity
Cetacean Society International
Chair, Concord on Tap
Change The Chamber*Lobby For Climate
Chautauqua-Conewango Consortium
Chirping Birds Society
Church Women United in New York State
Clean Fairfax
Clean Water Action
Climate Action Alliance of the Valley
Coalition to Protect America's National Parks
Collier County Waterkeeper inc.
Concerned Health Professionals of Pennsylvania
Coney Island Beautification Project, Inc.

Cook Inletkeeper
Coosa River Basin Initiative/Upper Coosa Riverkeeper
Corporate Accountability
Debris Free Oceans
Earth & Me, LLC
Earth Island Institute
Earth Law Center
Ecology Center
Effect Partners
Ekosfere
Elders Climate Action (ECA)
Elders Climate Action (ECA) Maryland Chapter
Elders Climate Action (ECA) NorCal Chapter
Elders Climate Action (ECA) SoCal Chapter
Emerald Keepers
Endangered Species Coalition
Environment America
Environment Georgia
Environment Illinois
Environment Oregon
Environment Texas
Environment Washington
Environmental Defense Center
Fenceline Watch
FoCo Trash Mob
Food & Water Watch
FreshWater Accountability Project
Friends of Dyke Marsh
Friends of the Mariana Trench
Friends of the San Juans
GAIA
Gotham Whale
Grassroots Environmental Education
Green Clean Athol
Green Schools Alliance
GreenLatinos
Greenpeace USA
Gunpowder RIVERKEEPER®
Haw River Assembly
Healthy Ocean Coalition
Heirs To Our Oceans
Hispanic Federation
HOMAGE
Hudson Riverkeeper
Humane Action Pittsburgh
Humboldt Baykeeper
Illinois PIRG
Inland Ocean Coalition
Interfaith Climate Group
International Marine Mammal Project of Earth Island Institute
Lake Coeur d'Alene Waterkeeper/Kootenai Environmental Alliance
LEAD Agency, Inc.
League of Conservation Voters
Lite Foot Company
Live Zero Waste
Lonely Whale

Lopez-Wagner Strategies
Los Angeles Waterkeeper
Lynnhaven River NOW
MacCoy Home Solutions
Marine Conservation Institute
Marine Mammal Alliance Nantucket (MMAN)
Maryland PIRG
Mazaska Talks
Miami Waterkeeper
Milwaukee Riverkeeper
Missouri River Bird Observatory
Mystic Aquarium
Napa Climate Now/350 Bay Area
Nassau Hiking & Outdoor Club
National Aquarium
National Ocean Protection Coalition
National Parks Conservation Association
National Stewardship Action Council
Nature in the City
NY/NJ Baykeeper
NY4WHALES
Occidental Arts and Ecology Center
Ocean Alliance, Inc.
Ocean Conservancy
Ocean Conservation Research
Ocean First Education
Ocean First Institute
Oceana
Oceanic Global
Oceanic Preservation Society
Orange County Coastkeeper
Organizing for Plastic Alternatives
Our Marsh Counts - Clean Waters Initiative
Patagonia
Peconic Baykeeper
Physicians for Social Responsibility Pennsylvania
Plaine Products
Plastic Pollution Coalition
Point Defiance Zoo & Aquarium
Potomac Riverkeeper Network
Prepare with Cher
Public Employees for Environmental Responsibility
r.Cup
Raritan Riverkeeper
Repair the Sea | Tikkun HaYam
Resource Depot
Rio Grande International Study Center
Russian Riverkeeper
Safer States
Sailors for the Sea Powered by Oceana
San Antonio Bay Estuarine Waterkeeper
Save the Manatee Club
Sea Hugger
Sea Shepherd
Seaside Sustainability
SeaSmart

SeaStraw13
Seattle Aquarium
Seatuck Environmental Association
Seeding Sovereignty
Seneca Lake Guardian
Shark Stewards
Sierra Club
Sisters of Charity Federation
Sisters of Charity of Leavenworth Office of Justice, Peace, and Integrity of Creation
Sisters of Charity of Nazareth Congregational Leadership
Sisters of Charity of New York
Sisters of Charity of Our Lady of Mercy
Sisters of Charity of Saint Elizabeth, Office of Peace, Justice, and Ecological Integrity
Sisters of Charity of Seton Hill
Society of Native Nations
South Shore Audubon Society
Spokane Zero Waste
St. Marys Riverkeeper
Storm Surge
Surfing Florida Museum
Surfrider Foundation
Surfrider Foundation Palm Beach County Chapter
Sustainable Mill Valley
Sustainable Roanoke
Sustainable Villages
SYRCL
TAO (Tethra Advisors and Officers)-Blue Economy, Blue Tech and Blue Eco-System Consultancy
Tennessee Riverkeeper
Texas Campaign for the Environment
The Center for Oceanic Awareness, Research, and Education (COARE)
The CLEO Institute
The Climate Reality Project, Baltimore Area Chapter
The Climate Reality Project, California Coalition
The Climate Reality Project, Los Angeles Chapter
The Climate Reality Project, Montgomery County
The Climate Reality Project, Orange County Chapter
The Climate Reality Project, San Diego Chapter
The Climate Reality Project, San Fernando Valley Chapter
The Climate Reality Project, San Francisco Bay Area Chapter
The Climate Reality Project, Santa Barbara Chapter
The Last Beach Cleanup
The Last Plastic Straw
The Ocean Project
The Phoenix Group
The Story of Stuff Project
Think Zero LLC
Three Rivers Waterkeeper
Thrive At Life: Working Solutions
TNP
Transformative Wealth Management, LLC
Turtle Island Restoration Network
U.S. PIRG
Upper Allegheny Waterkeeper
Virginia Aquarium & Marine Science Center
Virginia Conservation Network
Waterkeeper Alliance

Waterkeepers Chesapeake
Waterway Advocates
WESPAC Foundation, Inc.
WILDCOAST
Winyah Rivers Alliance
Yuba River Waterkeeper
Zero Waste Company
Zero Waste Hawai'i Island
Zero Waste Ithaca
Zero Waste Washington

ⁱ Forrest A, Giacobazzi L, Dunlop S, et al. (2019) Eliminating Plastic Pollution: How a Voluntary Contribution From Industry Will Drive the Circular Plastics Economy. *Front. Mar. Sci.* 6: 627. doi: 10.3389/fmars.2019.00627

ⁱⁱ Wright, Laurie (May 15, 2019) Plastic warms the planet twice as much as aviation - here's how to make it climate-friendly. *The Conversation*. Available: <https://theconversation.com/plastic-warms-the-planet-twice-as-much-as-aviation-heres-how-to-make-it-climate-friendly-116376>. Accessed Jun 29, 2021.

ⁱⁱⁱ Climate Watch Data (n.d.) China Climate Change Data. In: *Climate Watch*. Available: <https://www.climatewatchdata.org/countries/CHN>. Accessed August 24, 2022.

^{iv} Volcovici, Valerie (May 5, 2022) U.S. plastic recycling rate drops close to 5%-report. *Reuters*. Available: <https://www.reuters.com/world/us/us-plastic-recycling-rate-drops-close-5-report-2022-05-04/>. Accessed Jul 8, 2022.

^v The National Park Service. (2017) Disposable Plastic Water Bottle Recycling and Reduction Program Evaluation Report. *United State Department of the Interior*, p. 8. Available: https://www.nps.gov/aboutus/foia/upload/Disposable-Plastic-Water-Bottle-Evaluation-Report_5_11_17.pdf. Accessed Jul 3, 2022.

^{vi} The National Park Service. (2022) Teaming up to keep park waste out of landfills. Available: <https://www.nps.gov/articles/000/teaming-up-to-keep-park-waste-out-of-landfills.htm#:~:text=Choose%20materials%20that%20can%20be,when%2Fwhere%20access%20is%20available>. Accessed Jul 3, 2022.

^{vii} 5 Gyres Institute (2017) Better Alternatives Now: B.A.N List 2.0. 25p.

May 24, 2023

The Honorable Deb Haaland
Secretary
U.S Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Haaland,

Thank you for your leadership and commitment to reduce single-use plastics within the U.S. Department of the Interior (DOI). We commend you for issuing Secretary's Order No. 3407, which will phase out the procurement, sale, and distribution of single-use plastic products and packaging across all DOI-managed lands by 2032. Today we are writing with a specific focus on the National Park Service (NPS).

As the one-year anniversary of your secretarial order approaches, we are looking forward to seeing a strong and swift NPS implementation plan that phases out single-use plastic items like plastic and polystyrene food and beverage containers, bottles, straws, cups, cutlery, and disposable plastic bags. In advance of the release, we are sending this outline of practical steps forward. We recommend the following steps be included in the plan for NPS:

- Immediately discontinue the purchase of polystyrene products.
- Strongly support alternatives to single-use plastics and emphasize reusable systems rather than single-use disposable items. Switch from single-use utensils to low-cost, durable reusable utensils.
- Launch a zero-waste strategy for NPS offices and events using the Zero Waste Roadmap by the National Park Conservation Association.
- Include provisions in all new concession contracts prohibiting the use of single-use foodware-related products in park operations, including employee housing and dining.
- Prohibit greenwashing. Since less than 6% of disposed U.S. plastic is recycled and most new plastics can only be recycled one or two times – the concept of a "plastics circular economy" should not be considered a strategy.
- Invest substantially in park drinking water refill stations. Park websites and signage should include information on water availability and status of water safety (not just when it is unsafe). Ensure that all existing refill stations and water fountains have continued access to potable water. NPS should use infrastructure funding and recycling grant funding to install and repair water refill stations.
- Incorporate employee and visitor education in support of single-use plastics reduction in parks, availability of water refill stations such as inclusion on park maps and the NPS website, and awareness of product alternatives.
- Develop a robust timeline for implementation that incentivizes concessioners to "beat" the 10 year phase-out.
- Partner with sustainability leaders in the 23 parks that phased out plastic water bottles (implementing the 2011 NPS Director's Policy Memo (PM) 11-03).

We represent a community of NGOs, Indigenous groups, and businesses who have advocated for the phase-out of plastics within NPS for several years. In 2021, more than 300 NGOs and businesses sent you a letter requesting that you direct NPS to eliminate the sale or distribution of single-use plastics in our national parks. In response to the secretarial order in June 2022, we sent you a letter to provide recommendations to shorten the 10-year timeline, prioritize reuse and refill systems, and caution against bioplastic alternatives.

In June and August 2022, members of our coalition met with Department of the Interior staff to provide a briefing on best practices for phasing out single-use plastics. Our recommendations were based on access to resources and examples of other successful plastic phase-out plans. Examples of past plastic phase-out plans include some of the nation's largest aquariums as well as the national parks that implemented the 2011 director's order on water bottles in national parks.

We collectively applaud you for leading the way for our nation's government to address the harmful impacts of plastic pollution. Your department has the power to make an immensely important impact on the environment as well as significantly boost the public's understanding of this issue. We urge you to adopt a meaningful set of plans that moves NPS toward sustainable and climate-neutral operations. The plan must include thoughtful prohibitions on single-use plastics coupled with reuse and refill systems to fulfill your vision for a more plastic pollution-free future for our nation.

Sincerely,

1000 Grandmothers for Future Generations
350 Seattle
5 Gyres
ABC Earth Care Team
Active San Gabriel Valley
Aina Momona
Alaska Environment
Alliance of Nurses for Healthy Environments
American Littoral Society
Aquarium Conservation Partnership
Arkansas Ozarks Waterkeeper, Inc.
Atchafalaya Basinkeeper
Association of Zoos and Aquariums
Azul
Azulita Project
B&P, Inc
Bainbridge Island Zero Waste
Bee Wild Outside
Between the Waters
Beyond Plastics
Big Blue & You
Blue Ocean Warriors
Bold Reuse
BYOB

Breathe Free Detroit
Breathe Project
Bring Your Own Connecticut (BYOCT)
Cafeteria Culture
Cahaba Riverkeeper
California Communities Against Toxics
California Public Interest Research Group (CALPIRG)
CALPIRG Students
Calyx
Cameron Park Zoo
Cape Perpetua Collaborative
Capital Region Interfaith Creation Care Coalition
Captain Planet Foundation
California Certified Organic Farmers
Center for Biological Diversity
Center for Coalfield Justice
Central Coast Land Conservancy
Chatauqua-Conewango Consortium, A Waterkeeper Alliance Affiliate
Chesapeake Legal Alliance
Chirping Birds Society
Choctawhatchee Riverkeeper
Church Women United in New York State
Clean Oceans International
Clean Virginia Waterways
Climate Action Alliance of the Valley
Climate Crisis Policy
Climate Reality Maryland
Climate Reality Project Orange County Chapter
Climate Tzedek, a committee of Congregation Netivot Shalom
Coastal Georgia Climate Reality Chapter
ColorBrightonGreen
Concerned Health Professionals of Pennsylvania
Coney Island Beautification Project, Inc.
Cook Inletkeeper
Corporate Accountability
Creation Justice Ministries
CupZero Inc
Debris Free Oceans
Devocean Pictures
Don't Waste Durham
Earth & Me
Earth Island Institute
EarthEcho International
Elders Climate Action
Elders Climate Action Maryland
Emerald Keepers
Endangered Species Coalition
Engaging Every Student
Environment America

Environment Georgia
Environment Illinois
Environment Oregon
Environment Virginia
Environment Washington
Environmental Action
Environmental Action Community of Western North Carolina
Event Network
Fenceline Watch
Florida Oceanographic Society
FracTracker Alliance
Free Flow Wines
FreshWater Accountability Project
Friends of Dyke Marsh
Friends of Palm Beach
Friends of the LA River
Friends of the Mariana Trench
Friends of the San Juans
GBC Sustainability Team
GreenLatinos
Georgia Aquarium Inc.
Georgia Interfaith Power and Light
Gradible
Grassroots Environmental Education
Green Maynard
Green Schools Alliance
Greenpeace USA
Gunpowder Riverkeeper
Hackensack Riverkeeper
Harrison sustainability committee
Healthy Living Foundation
Healthy Ocean Coalition
Hispanic Access Foundation
HOMAGE, LLC
Hudson Riverkeeper
Humane Action Pittsburgh
Illinois Public Interest Research Group (PIRG)
Inland Ocean Coalition
International Marine Mammal Project of Earth Island Institute
Jack Johnson Music
Jae Rae Associates, Inc.
Jenkinson's Aquarium
John Muir Project of Earth Island Institute
Kansas City Zoo
Kokua Hawaii Foundation
League of Conservation Voters
Lite Foot Company LLC
Lopez-Wagner Strategies
Lynnhaven River NOW

Maison Jar LLC
Marine Mammal Alliance Nantucket (MMAN)
Massachusetts Public Interest Research Group (MASSPIRG)
Mermaid Tasha LLC
Micah Six Eight Mission
MikeArens.com
Milwaukee Riverkeeper
Mission Blue
Moms Clean Air Force
Muuse
Mystic Aquarium
Nassau Hiking & Outdoor Club
National Aquarium
National Mississippi River Museum & Aquarium
National Ocean Protection Coalition
National Stewardship Action Council
North Carolina Public Interest Research Group (NCPIRG)
News from the Neighborhood
National Parks Conservation Association
NY4WHALES
Occidental Arts and Ecology Center
Ocean Conservation Research
Ocean Defense Initiative
Ocean River Institute, Inc
Oceana
Oceanic Preservation Society
Office of Peace, Justice, and Ecological Integrity /Sisters of Charity of Saint Elizabeth
Open Water
Oregon Coast Aquarium
Oregon Physicians for Social Responsibility
Organizing for Plastic Alternatives
Pacific Whale Foundation
Pacifica's Environmental Family
Paddle Out Plastic
PASUP (Pittsburghers Against Single Use Plastics)
Physicians for Social Responsibility Pennsylvania
Pittsburgh Zoo & Aquarium
Plaine Products
Plastic Free Future
Plastic Free Marin
Plastic Ocean Project, Inc
Plastic Pollution Coalition
Plastic Solutions Fund
Plastics Free Initiative
Potomac Riverkeeper Network
Public Employees for Environmental Responsibility
Puerto Rico Department of Natural and Environmental Resources
Puget Soundkeeper
r.Cup

Remark
Repair the Sea | Tikkun HaYam
Resource Depot
Resource Renewal Institute
Reusable Solutions
Rockaway Creates
Rogue Riverkeeper
Rozalia Project
Russian Hill Neighbors
Safer States
Sailors for the Sea Powered by Oceana
San Diego Coastkeeper
Sanctuary Education Advisory Specialists SEAS
Save Our Shores
Save the Albatross Coalition
Save the Pine Bush
Save the Sound
Scuba Shack Diving Services LLC
Sea Hugger
Seattle Aquarium
Seeding Sovereignty
Seneca Lake Guardian, a Waterkeeper Alliance Affiliate
Shark Stewards
Shedd Aquarium
Sheffield Saves
Sierra Club Loxahatchee Group
Sierra Club-Broward Group
Sioux Falls Zoo and Aquarium
Sisters of Charity of Nazareth Congregational Leadership
Sisters of Charity of Nazareth Western Province Leadership
SoCal 350 Climate Action
Society of Native Nations
South Carolina Aquarium
South Shore Audubon Society
Student Public Interest Research Groups (PIRGs)
Surfrider Foundation
Susie King Taylor Women's Institute and Ecology Center, Inc
Sustainable Mill Valley
Sustainable Roanoke
Sustainable Sharon Coalition
Sustainable Works
Taller Ecologico de Puerto Rico
TAO: Blue Economy and Blue Tech Consultants
Tennessee Riverkeeper
The Altai Project
The Bay Foundation
The Borneo Project
The Climate Reality Project San Diego Chapter
The Florida Aquarium

The Last Beach Cleanup
The Last Plastic Straw
The Ocean Foundation
The Ocean Project
The Richard Manso Law Office
The Science Exchange, a project of the Ocean Foundation
The Story of Stuff Project
Think Zero LLC
Three Rivers Waterkeeper
Thrive at Life: Working Solutions
Topanga.io
Toxic Free NC
Tsadik G Management LLC
Turtle Island Restoration Network
U.S. Public Interest Research Group
Uncommon Goods
Upper Allegheny Waterkeeper
Urban Ocean Lab
Virginia Aquarium & Marine Science Center
Virginia Coastal Alliance
Virginia Conservation Network
VolunteerCleanup.Org
Washington Physicians for Social Responsibility
Waterkeeper Alliance
Waterkeepers Chesapeake
Wayland Green Team
WESPAC Foundation, Inc.
Wild Cumberland
WILDCOAST
Winyah Rivers Alliance
Zero Waste Hawai'i Island
Zero Waste Ithaca
Zero Waste Washington
ZeroWaste.Org