



**Review of the National Park Service
Plastics Elimination and Reduction Plan – June 2023
As Required by U.S. Department of the Interior
Secretarial Order 3407**

U.S. Department of the Interior Secretarial Order 3407 (June 8, 2022) requires each Interior bureau to produce and implement a plan to eliminate the procurement, distribution, and sale of single-use plastics (SUP) by 2032. On September 28, 2023, an Interior Department press release announced that all bureau plans had been produced and approved by the Department. The National Park Service (NPS) plan is one of the approved plans.

The NPS Plastics Elimination and Reduction Plan (June 2023) was made available to the public on September 28, 2023. It sets forth a 10-year effort to eliminate the use of single-use plastics in parks and offices to the extent possible. It recognizes the important role that the NPS can and should play in educating the 300 million annual visitors to the parks about the importance of reducing single-use plastics. The plan focuses on NPS operations, commercial services providers, and partner operations in parks. The plan envisions addressing the full range of plastics that are used in the full range of park operations.

The plan incorporates four implementation principles:

- Foster a sustainability ethic and empower employees and partners, in alignment with the Green Parks Plan
- Work with partners, internal and external to DOI, to achieve the Secretarial goal
- Prioritize source reduction when developing and implementing phaseout and reduction policies
- Apply system-based and life-cycle approaches informed by data and science

The plan consists of nine steps for implementation spread over a 10-year period.

- Years 1-2: Data collection, planning, schedules, and policy development
- Years 3-4: Expand implementation
- Years 5-9: Full implementation
- Year 10: Achieve 100% phase-out of single-use plastics

Further, the plan recognizes that staffing and funding limitations will have to be overcome in order to implement the plan, but the NPS can learn from others as to how to overcome these challenges.

However, the plan has a number of weaknesses that will hinder its timely implementation.

- The 10-year implementation schedule is troubling. Changes in Administrations during this 10-year period will create many opportunities to kill this effort to eliminate the plastics. We have seen this occur in recent years when the Trump administration killed the effort to expand the elimination of plastic water bottles in the parks. This occurred after 22 parks had implemented the water bottle elimination through cooperation with commercial service providers and partners. Further, lobbying efforts from Coca-Cola and other entities are likely to continue their efforts over the 10-year period to kill any efforts to eliminate plastic beverage containers.
- Under the 10-year schedule, years 1-2 will be focused solely on data collection and planning and initial implementation may occur in years 3-4. Focused implementation does not occur until years 5-9. While the plan states that it will look to external entities for best practices for implementation, it does not consider that many of these efforts have occurred on a more ambitious timetable than the one proposed by the NPS. One such example is the University of California system which is currently implementing a three-year effort to eliminate SUP from all of its campuses and research facilities.
- A 10-year implementation schedule will send a message to NPS staff that this initiative is not very important. Almost no operational initiative in NPS history has been placed on a 10-year implementation schedule. The most significant one in history in the NPS was Mission 66 which was a 10-year effort to improve employee housing and other support facilities in the parks. And that effort concluded in 1966. The extremely slow implementation schedule will provide many opportunities for critical issues of the moment to place this effort on a backburner and then eventually forgotten.
- In NPS history the bureau has produced numerous plans to address major organizational challenges. Yet, senior leaders have failed to show focused attention to the needed efforts and thus progress is most often minimal at best. No sense of urgency is created with a 10-year implementation schedule. The result has been very low ratings for senior NPS leaders in the Best Places to Work in the Federal Government and the continual slide in the NPS ranking to 371st place out of 420 entities.
- The plan does not create any accountability on the part of park superintendents. Data on implementation will only be tracked on an aggregate basis at the national office (WASO) level. The plan does not mention any system of rewards for those parks and their superintendents that do an excellent job of eliminating plastics.
- The plan states that voluntary efforts beyond the schedule in the plan must be approved at the WASO level where reviews and approvals can sit for long periods of time. Approvals at the national office level will create opportunities for various entities to further kill any park initiatives. This creates a disincentive for parks that wish to move quickly to remove plastics on a much more ambitious schedule.

Comparison to select DOI bureau plastics elimination plans:

- U.S. Fish and Wildlife Service: While only 6 pages compared to the 34-page NPS plan, it sets forth some ambitious goals. By the end of FY2024, new concessions contracts will call for the elimination of single-use plastics (SUP). By the end of the same year, the bureau will eliminate 25 percent of single use plastic bottles and begin to highlight success stories to share internally and externally. Internal use of SUP at gatherings will be

eliminated by the end of FY2025. The bureau's concessions policy is being updated this year and will call for the elimination of all SUP in concessions operations.

- Bureau of Land Management: The Bureau plan focuses on contract performance and micro purchases. Full phaseout of reduction of SUP is being sought by the end of FY2027 in these acquisition areas with elimination of procurement no later than the end of 2032.
- U.S. Geological Survey: Most SUP are obtained for USGS scientific work. The bureau plans to eliminate 20 percent of SUP in 2024, 30 percent in 2025, 40 percent in 2026, and 55 percent in 2027 towards the goal of full elimination in 2032.
- Bureau of Ocean Energy Management and Bureau of Safety and Environmental Enforcement: SUP will be addressed in environmental audits by the end of FY2024. Efforts to eliminate SUP will be fully developed by the end of FY2025. The plan does not discuss any efforts to work with oil, gas, and wind power lessees.
- Bureau of Reclamation: The plan calls for collaborating with concessionaires and other entities that manage recreation and wildlife areas for the Bureau to work towards the 2032 goal for the elimination of SUP.

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