

February 26, 2023

Robin Carnahan
Administrator
U.S. General Services Administration
1800 F Street, NW
Washington, DC 20405

Re: Business Coalition Letter on GSA Proposed Rulemaking, FR Doc # 2023-27942

Dear Administrator Carnahan:

The undersigned business organizations appreciate the opportunity to comment on GSA's advance notice of proposed rulemaking in response to GSAR Case 2022–G517.

While we share GSA's objective to reduce plastic waste in the environment and greenhouse gas emissions, this proposed rule to amend the Federal Supply Schedule provisions related to packaging procurement could, in practice, result in increased environmental impact and harm the economy. We urge GSA to reconsider the proposed rule and engage the U.S. business community and the associated plastics value chain in designing policies that do not choose winners and losers but rather embrace the wide range of solutions and innovation available.

Single-use plastics (SUPs) are essential to a modern, sustainable economy.¹ We believe that material selection decisions by federal and state agencies, therefore, should take a materials neutral approach that considers the full product lifecycle, including embedded and end-of-life emissions.

The proposed rule's intention to consider SUP-free packaging as the sustainable standard in the Federal Supply Schedule procurement system does not offer a market-based solution for procurement decision makers and vendors. Furthermore, any definition of packaging options should clearly explain the benefits of both SUP and SUP-free packaging, acknowledging when plastic packaging is less resource or carbon-intensive choice than alternative materials. Some applications of plastics in packaging provide a necessary level of protection or barrier-layer performance that is otherwise unachievable without significant increases in material usage. Material alternatives may also be subject to regulatory validation requirements, as would be the case in pharmaceutical packaging.

Plastics are essential to clean energy, electrification, construction, and many other industries that are leading the transition to a sustainable and circular economy. Limiting the procurement and use of plastic-based packaging through the Federal Supply Schedule could cause environmental and economic harm.

¹ Kenneth Green, *Plastics and Sustainability*, Plastics Industry Association, October 2021.
<https://thisisplastics.com/wp-content/uploads/Plastics-and-Sustainability.pdf>

Communities and companies need all the tools in the toolbox to recycle and address the product lifecycle challenges that are preventing circularity. Innovative technologies, including advanced or molecular recycling, will allow a greater and more sustainable flow of post-consumer plastic feedstocks to manufacturers, thus enabling greater amounts of high-performance recovered materials and reductions in greenhouse gas emissions.² This innovation, coupled with a commitment to deploying robust collection and waste management infrastructure throughout the country, ensures a system in which plastic products are effectively recaptured and prevented from entering the environment.

Any federal procurement rulemaking should promote circularity throughout the plastics product lifecycle, facilitate widespread adoption of mechanical and advanced recycling technologies, catalyze innovation in product design, and drive new investments in the collection systems and reuse of all materials. More plastics could be recycled with sufficient policy support, upgraded municipal capabilities, and the infrastructure and technologies needed to collect, sort, and process these products and develop new markets.

Plastic pollution in the environment is both a national and global challenge that requires cooperation among industry, government, the environmental community, and consumers. We must first prioritize solutions to eliminate plastic waste in the environment rather than impose arbitrary limits or bans that fail to consider the full lifecycle of products.

We stand ready to assist the federal government's efforts and look forward to working together to implement effective waste policy.

Sincerely,

U.S. Chamber of Commerce
Air-Conditioning, Heating and Refrigeration Institute
American Fuel & Petrochemical Manufacturers
American Petroleum Institute
Communications Cable & Connectivity Association
Flexible Packaging Association
International Bottled Water Association
Plastics Industry Association
Printing United Alliance
The Vinyl Institute

² Ulises Gracida-Alvarez, Pahola Benavides, Michael Wang Uisung Lee, *Life-cycle analysis of recycling of post-use plastic to plastic via pyrolysis*, Argonne National Laboratory, September 2023.
<https://www.sciencedirect.com/science/article/pii/S0959652623030251>