



## Pack Green Coalition Public Comment - GSAR Case 2022-G517

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[Pack Green Coalition \(Pack Green\)](#) appreciates the opportunity to submit comments to the General Services Administration (GSA) in response to its advanced notice of proposed rulemaking (ANPR) regarding the use of plastics in packaging and shipping. Pack Green is an organization driven to replace unnecessary plastic within the global packaging and food service supply chains with sustainably sourced paper and other renewable and recyclable alternatives. Through advocacy, outreach, and education, we aim to advance meaningful change today that is critical for protecting our tomorrow.

We are in a global plastics crisis. The UN Environment Programme reports that there are 11 million metric tons of plastic entering the ocean annually, and this number is expected to triple in the next twenty years without **urgent action**. They also estimate that 36% of all plastics produced are used in single-use packaging, including food and beverage containers. With the rapid expansion of e-commerce during the pandemic and global plastic consumption expected to grow from 460 million metric tons in 2019 to 1,231 million metric tons by 2060, this means that shifting away from plastic packaging and towards sustainable packaging is crucial to preserving our environment.

GSA has an extraordinary opportunity to act urgently to help solve this crisis by opting for sustainable packaging solutions. Sustainable packaging can effectively fulfill the needs of GSA's contractors, while also helping to further grow the market and demand for these products.

### Product Examples

GSA should be able to make quick changes – as there are countless examples of sustainable products that can immediately replace single use packaging. [Ranpak Holding Corp.](#), for example, has replaced the need for plastic bubble wrap with a 100% curbside recyclable product called Geami®, which protects products during shipping while wicking away moisture and reducing void fill requirements. This is just one example of a product available today that could be used by USPS in place of plastic bubble wrap.



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Similarly, for disposable food and beverage packaging, GSA could reduce plastic waste by procuring paper containers. Companies, such as [Footprint](#), have created entire lines of quick service food packaging made from paper.



A common issue that previously limited the recyclability of paper food containers was a plastic lining used to prevent grease and moisture leakage. A company called [Notpla](#) created a biodegradable coating from seaweed, which replaces the plastic or bioplastic lining typically used, which is not recyclable or compostable. Seaweed is even a packaging solution for ketchup packets and bottled water. GSA should take advantage of the innovation that has brought these solutions to market and lead the way in replacing plastic packaging.

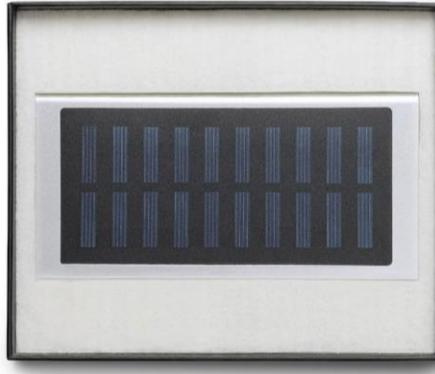


Another challenge of replacing plastic is maintaining cool temperatures for perishable items when transporting them, a crucial part of food service. This issue has also already been successfully addressed. Temper Pak, for example, uses an insulating foam made out corn starch, called ClimaCell, to replace polystyrene packaging, and is it fully curbside recyclable.





In the context of electronics, appliances, and fragile consumer packaged goods, a company called [Cruz Foam](#) has developed a packaging material using all naturally occurring materials to replace harmful Styrofoam while offering all the same performance. Cruz Foam's circular materials can be sold at the same price, at scale, as its petroleum-based counterparts.



### **Factors for Consideration**

Paper and other sustainable packaging products significantly decrease the overall environmental impact. There are three important factors we encourage GSA to consider when trying to improve the sustainability of the packaging products their contractors use:

- Decreasing leakage into the environment
- Reducing greenhouse gas emissions/carbon footprint
- Improving circularity, which includes increasing recycling rates, using more recycled content, saving energy and reducing pressure on natural resources

Focus on only one or two factors may cause the sustainability of the packaging material to suffer when viewed over the course of its entire life cycle. It is crucial that GSA takes this opportunity to not only help reduce the carbon footprint of the federal government, but also to protect natural resources that have been depreciated with the ubiquitous use of plastics.

### **Recommendations**

Pack Green encourages GSA to consider the following key opportunities to contribute to a more circular economy when revising its procurement rules:

- **Move quickly.** We were encouraged to see the Administration's recent announcement to end single use plastics in National Parks. That said, the phase-out won't be complete until 2032 – a decade from now. We would encourage GSA to move more quickly. For many products, solutions are available right now and already in use both in the U.S and other countries. GSA does not need to wait to start using these products. We encourage GSA to immediately switch to sustainable products and start making a difference now.



- ***Make changes where you can, when you can.*** There are numerous sustainable packaging alternatives available on the market today, including, but not limited to, paper, mycelium, seaweed, and wool. These packaging materials can protect glass or other breakable items during shipping. They are used to create sturdy, greaseproof, and easily disposable food containers. Even challenges to keeping food and pharmaceuticals below required temperatures during transit have been solved by utilizing some of these materials. For some plastic products, solutions may not exist today. In these cases, consider different timelines for different groups of products. Products that are on the market today and have been proven to be effective should be used immediately.
- ***Minimum standards based on percentage actually recycled.*** “Recyclable” does not mean a product is actually getting recycled. The recycling rate for a given material should be measured based not on collection or access to collection but, rather, on the material’s (1) actual reclamation at appropriate facilities that meet the requirements of the Basel Convention and (2) re-entry into the commerce stream. We urge GSA to require its contractors to meet aggressive but achievable minimum percentages for different materials as it determines appropriate.
- ***Truth in labeling.*** GSA should also require that a product may only be labelled as “recyclable” (whether through text or symbol) if it meets the recyclability thresholds mentioned above and if the material type and form routinely becomes feedstock used in the production of new products or packaging, as California mandated through [SB 343](#). These requirements will increase circularity of the U.S. economy and instill greater confidence and trust in the U.S. recycling system.

Pack Green applauds the work of GSA and looks forward to working to help reduce the use of single use plastics.