



# **U.S. Department of the Interior 2023 Indian Affairs Sustainable Procurement Plan**

**June 8, 2023**



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## 1. Executive Summary

The purpose of this plan is to develop and implement a strategy to meet the intent of Secretarial Order (SO) 3407: Department-Wide Approach to Reducing Plastic Pollution, signed June 8, 2022 (See Appendix A). This Order prioritizes Department of the Interior (DOI) action to reduce the amount of plastic waste produced by the Department in support of the goals of Executive Order (EO) 14057, "Catalyzing Clean Energy Industries and Jobs through Federal Sustainability," and to further reestablish the Federal Government as a leader in sustainability. Secretarial Order (SO) 3407 directs Bureaus to develop a sustainable procurement plan to phase out single-use plastic (SUPs) products by the end of 2032.

Within this plan, the term "Indian Affairs" is meant to include the Bureau of Indian Affairs, the Bureau of Trust Funds Administration, and the Office of the Assistant Secretary – Indian Affairs (AS-IA). The scope of this plan is intended for Indian Affairs (IA) programs, excluding the Bureau of Indian Education (BIE). IA provides services directly or through contracts, grants, or compacts to a service population of American Indians and Alaska Native people who are members of 574 federally recognized Tribes in the 48 contiguous United States and Alaska. The BIE created a separate plan.

Key to this plan is to carefully coordinate with the following stakeholders with their designated representatives to serve as team members.

- Deputy Bureau Director, Office of Trust Services (DBD-OTS)
- Office of Chief Financial Officer (OCFO)
- Director, Assistant Secretary of Administration (DAS-M)

OTS will work closely with all stakeholders to identify roles and responsibilities, authorities, and accountabilities for each representative and develop goals and objectives to meet EO 14057.

Because IA has not tracked SUP procurement in the past, the team will focus its initial efforts on research, data collection, procurement guidance review, educational awareness, and establish initial procurement guidance to reduce the purchase of SUP. OTS as the lead will review this plan annually to incorporate strategy developments, progress toward targets, and best management practices adopted by the Department, as established by the Plastics Community of Practice and similar working groups. OTS commits to coordinating and collaborating with key stakeholders for the continued benefit of IA.

## 2. Schedules and Annual Targets Addressing the Reduction of Procurement, Sale, And Distribution of Single-Use Plastic Products

The team plans to conduct research, data collection, identification of feasible alternatives, and development of educational/marketing materials starting in Fourth Quarter Fiscal Year (FY) 2023 through FY 2024. The team will coordinate with IA Head of the Contracting Activity (HCA) on appropriate timeframes for implementation of revised procurement guidance, to be distributed by First Quarter FY 2024. Once sufficient supporting information is compiled and analyzed, IA will begin to implement the SUP in phases. The team will consider the following strategies:

- Obtain FBMS data to determine type and volume of plastic procurement activities in FY 2022 forward.
- Query IA programs to determine type and volume of plastic procurement.
- Evaluate Data – determine level of effort to establish and implement new sustainable procurement requirement.
- Identify facilities that procure larger quantities of plastics via contracting mechanisms and determine opportunity for higher quantity reductions (including contracts and micro-purchases).
- Create Procurement and Waste Stream Profiles for Each IA Entity - Identify Largest Consumers of SUP.
- Research and identify feasible alternatives.
- Identify data source or system to maintain data to ease reporting requirements.
- Provide awareness sessions to announce the sustainability plan.
- Create and implement training to ensure all key staff are informed and can provide guidance on alternative purchases.
- Conduct pilot study at one or two Regions to evaluate feasible alternatives and phase out.
- Implement IA-wide phase out efforts for remaining IA facilities/programs.

The following table and timeline list the various milestones and target dates identified in this Procurement Plan.

MILESTONE	TARGET Start Date	TARGET Completion Date	LEAD Office
Initial Awareness Overview - Distribute this plan as appropriate within IA	Q4 FY 2023	Q4 FY 2023	OTS with Stakeholders
Establish Team	Q4 FY 2023	Q4 FY 2023	OTS with Stakeholders
Determine Universe of Facilities for Indian Affairs to track, excluding BIE programs.	Q4 FY 2023	Q4 FY 2023	OTS with Stakeholders

Coordinate Research, Data Collection (IA-wide) - Query IA programs to determine type and volume of plastic procurement.	Q4 FY 2023	Q1 FY 2024	OTS with OCFO
Collaborate with DOI PAM office to determine if acquisition and charge card policies need to be updated to address SUPs or will guidance memo suffice	Q4 FY 2023	Q2 FY 2024	IA HCA
Provide updated acquisition and charge card guidance and SOPs to address SUPs	Q4 FY 2023	Q2 FY 2024	IA HCA and OTS
Start verifying alternatives for SUP requests. (Coordinate with Sustainability Officer)	Q2 FY 2024	Ongoing	IA Acquisitions & IA Property
Identify types, volume, and facilities that procure plastics (contracts and micro-purchases).	Q2 FY 2024	Q3 FY 2024	IA Acquisitions
Identify existing contracts that may pose a challenge for timely modifications, re-solicitation, and implementation of this procurement plan.	Q2 FY 2024	Q3 FY 2024	IA Acquisitions
Create Procurement and Waste Stream Profiles for Each IA Entity – Starting with Largest Consumers of SUP first	Q2 FY 2024	Q4 FY 2024	OTS with Team
Establish System to maintain, track and report sustainable procurement activities	Q2 FY 2024	Q1 FY 2025	OTS with OCFO and DOI BIO Team
Analysis of Feasible Alternatives – Limiting Factors	Q2 FY 2024	Q4 FY 2024	OTS
Identify Exemptions - Addendum to the Plastic Procurement Guidance Memo	Q2 FY 2024	Q4 FY 2024	OTS with Acquisitions
Evaluate the Need for Funding Requests and Associated Processes	Q4 FY 2024	Ongoing	OTS with Team
Coordinate with DIEA and OBPM to identify potential risks and performance measures that need to be monitored and tracked	Q3 FY 2024	Q1 FY 2025	OTS with DIEA and OBPM
Establish Data Driven Targets	Q3 FY 2024	Q1 FY 2025	OTS with Team
IA-wide Roll-Out with Revised Education and Training (to incorporate the targets, etc.)	Q1 FY 2025	Q4 FY 2030	OTS with Team
Evaluate Progress	Q2 FY 2025	Ongoing	OTS

TABLE 1. IA SUSTAINABLE PROCUREMENT PLAN MILESTONES AND TARGET DATES

### 3. Updates to Acquisition and Procurement Policies and Practices

IA conforms to green procurement policies, which address similar sustainability requirements as the SO. In addition, IA follows the DOI PAM Office acquisition and charge card policies. IA HCA will collaborate with DOI PAM office to update the DOI acquisition and charge card policies to address SUPs. IA HCA will issue a memo to expedite implementation in accordance with this

Procurement Plan and update guidance and SOPs on acquisition and charge card use to reduce, limit, and restrict the purchase of SUPs.

IA HCA will create updated procurement guidance memo to emphasize requirements for reducing SUP in accordance with the SO. Revisions may include changes to procedural elements, such as IA Property compliance reviews in the Financial and Business Management System (FBMS) for charge card purchases that exceed certain dollar amounts and a review and approval process for Purchase Requisitions. The memo may also include required contract language or provisions for inclusion in future solicitations. Under the revised guidance, the IA HCA can also direct IA programs and administrators to include requirements to reduce SUPs.

#### 4. Data collection methods, metrics, and reporting requirements to reflect the specific approaches proposed to phase out single-use-plastics by the end of 2032

Consistent with section 503 of E.O. 14057 and section IV.A of M-22-06, IA must track progress and provide reporting consistent with these instructions. To streamline reporting and data analysis, monitor progress, and measure performance, agency progress and performance data will be collected, to the extent possible, through established Federal reports and systems, including:

- Other Reporting Tools: CEQ or OMB may identify other data collection and reporting tools or request supplemental data.

The team will identify and evaluate sources of SUPs procurement at the Regions, Agencies and Central Office facilities. To do this, the team will consider various data collection methods using existing mechanisms within IA Acquisitions and other IA functions, such as contract and supply service agreement reviews (e.g., product service codes and North American Industry Classification System [NAICS] codes) can be used to help identify SUP procurement activities and charge card purchases and associated invoicing.

The team will also conduct interviews or develop a protocol to request information from Regional/Agency/Central Office staff to validate and parse data from Acquisitions reviews. Final procurement rates will be determined at the facility or program level. Using this information, the team will characterize SUP procurement and waste stream profiles for each IA facility/program.

Once supporting documentation for procurement rates is compiled, the team will establish data-driven targets that are feasible based on limiting factors, to be identified by Acquisitions and facility/program requirements. Limiting factors may include but are not limited to the following:

- Existing multi-year contracts.
- Product service codes and NAICS codes do not refer to specific items, but categories of items.
- Product service codes and NAICS codes do not track quantity of items, only dollar amounts.
- Changes to DOI-AAAP.
- Property restrictions.
- Annual funds distribution schedule.
- Limited operation and maintenance budgets and associated cost impact of transitioning to alternatives.
- Funding and project development/management.

IA procurement mechanisms involve purchase requisitions, purchase orders, blanket purchase agreements, and indefinite deliverable and indefinite quantity (IDIQ) contracts that provide opportunities for monitoring by the IA Acquisitions. IA Acquisitions will provide contract oversight to ensure SUP reductions are maximized based on the requirement. However, modifications to existing contracts, especially for multi-year supply services, may pose a challenge for timely modification, re-solicitation, and implementation of this Procurement Plan. For example, unknown the number of existing 5-year contracts for supply delivery. IA may consider excluding existing contracts and implement phase out to new requests.

IA Acquisitions will evaluate each contract requirement to identify opportunities to reduce or eliminate SUP procurement. Requirements of this Procurement Plan and its work products will be included in future solicitations. The IA Acquisitions will collaborate with DOI BIO team to strategize and establish a system or data source to track and report on contracted procurements based on service code or NAICS code.

The team will identify appropriate targets based on the type and amount of data available, e.g., percent reduction in dollars spent towards certain categories of purchases. The team will also decide which entity needs to report, the specific data points, and reporting format and mechanisms. Templates to be provided to facilitate streamlined, data-driven plans and calculate expected outcomes and results, including progress toward agency-established targets.

IA will apply the most impactful data-driven measures to reduce SUPs procurement as identified by stakeholders. Using data provided by IA Acquisitions and facilities/programs, the team will target those with the highest dollar value or quantity of SUP procurements. The team will also evaluate administrative buildings where IA and BIE are co-located and collaborate with local BIE personnel on facility-specific efforts to reduce SUPs.

## 5. Analysis of Alternatives to Single-Use Plastic Products



The team will analyze alternatives to SUP, such as compostable or biodegradable materials, or 100% recyclable, or 100% recycled materials or installation of features that eliminate need for single use such as water bottle fill stations. The team will then define which alternatives are feasible based on the IA mission and operations. The facilities/programs will define which alternatives are feasible, based on their requirements, delivery schedules, and resources available such as budget and storage capacity. IA Acquisitions will not specify alternatives for facilities/programs, but it can assist with soliciting alternatives from vendors and revising blanket purchase agreements or other contracts to include alternative requirements. The team will also identify and apply other limiting factors to the selection of alternatives.

The team will coordinate with facilities/programs to determine what, if any, recycling services are available and how alternatives may be impacted. IA anticipates many challenges regarding access to recycling services, because many IA facilities are in remote locations, but will maximize their utility in the identification of alternatives, where feasible.

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

The team will identify and/or develop educational outreach to IA programs and other IA support staff responsible for identifying requirements and executing procurement activities. The team will identify the appropriate audience for education and training opportunities and tailor training and marketing materials appropriately. In developing the training content, the team will consider the following:

- Tie the requirement to impacts on the environment.
- Emphasize the policy driver.
- Clearly identify next steps in the requirement planning and acquisitions process.
- Lessons learned from pilot studies.
- Per- and Polyfluoroalkyl Substances (PFAS) considerations in plastic containers.

The team will explore opportunities to provide training at events, such as Principal Leadership Institutes and Academies and Facilities Operation boot camps and will coordinate with the IA OCFO on other avenues to promote awareness. The team will explore creative ways to engage staff and solicit timely compliance with the new guidance and opportunities to reward compliance. The team will also work with the IA Acquisitions and IA Division of Property Management on methods to shift public behavior to reduce SUPs.

Initial awareness training will begin as early as Second Quarter FY 2024, when opportunities present. The IA Acquisitions can also provide training to ensure the effective distribution of

revised procurement guidance. More training information will become available as the plan is developed and implemented.

## 7. Single-Use Plastic Short-Term Exemptions, If No Alternatives Currently Exist

The team will evaluate scenarios in which short-term exemptions to this Procurement Plan are acceptable and documented for application.

## 8. Single-Use Plastic Exemptions for Medical, Public Safety, Public Health, Or Scientific Items

The team will evaluate scenarios in which exemptions to this Procurement Plan are acceptable and documented for application, e.g., facilities/programs may request exemptions in response to water quality and quantity issues (such as failure of water wells, water main breaks, PFAS exceedance, etc.).

## 9. Funding Requests

The team will evaluate the need for funding requests and identify an appropriate process for implementation of the Sustainable Procurement Plan. The team will also evaluate the need for a process for IA programs to request additional funding for alternatives. At the time this plan was prepared, no additional funding has been identified to offset increased costs that may be encountered by pursuing alternatives. The team will evaluate IA's ability to prioritize funding for implementation of this Procurement Plan, e.g., conversion to bottle filling stations will trigger work orders and associated funding process which may not be funded in a timely manner due to deferred maintenance work order backlog and availability of project managers.