

Congress of the United States
Washington, DC 20515

June 27, 2023

The Honorable Michael S. Regan
United States Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20024

Dear Administrator Regan:

We write with recommendations to strengthen EPA’s Draft National Strategy to Prevent Plastic Pollution. Although this Draft makes progress in our federal government’s approach to plastic pollution, we feel the strategy needs actionable plans and requirements. The entire life-cycle of plastics, from production to disposal, pose serious threats to the health of the planet and all of us who call it home.¹ While the Draft National Strategy acknowledges the dangers of plastic pollution—including health concerns of endocrine-disrupting effects from exposure to plastics leaching chemicals—an urgent commitment to necessary actions is required to curb such threats to public health.²

We are encouraged by the EPA’s written goals on reducing the production and consumption of single-use, unrecyclable, or frequently littered plastic products, as expressed in objective A1. Within subsection A1.2, the Draft National Strategy calls for the EPA to develop a plan to reduce single-use products across the federal government. Phasing out all federal procurement of single-use products would significantly reduce these and demonstrate leadership for both the public and private sectors. This phase out has already begun with the General Services Administration (GSA), which initiated a rulemaking process to limit its single-use plastics as well as plastic use in packaging and shipping.³ EPA should be a leader by establishing an urgent timeline for its own procurement and encouraging a government-wide effort to phase out single-use plastics as part of its National Strategy to Prevent Plastic Pollution.

Additionally, EPA procurement standards—both those it follows internally and those provided to other federal purchasers in the Recommendations of Specifications, Standards, and Ecolabels—should reduce federal procurement of polyvinylchloride and polystyrene, two of the most toxic

¹ Tatum McConnell, “Every stage of plastic production and use is harming human health: Report,” *Environmental Health News*, March 21, 2023, <https://www.ehn.org/effects-of-plastic-pollution-on-human-health-2659624790.html>

² “Draft National Strategy to Prevent Plastic Pollution: Part of a Series on Building a Circular Economy for All,” *Environmental Protection Agency Office of Resource Conservation and Recovery*, April 2023, page 9.

³ Posted by the General Services Administration, “General Services Administration Acquisition Regulation: Single-Use Plastics and Packaging, 2022-19376” *Regulations.gov*, September 27, 2022, <https://www.regulations.gov/document/GSA-GSAR-2022-0014-0026>

plastics.^{4 5} The chemicals that comprise and/or are commonly added to these plastics pose threats to human health, including cancer, asthma, liver and other organ damage, reproductive, and developmental harm.⁶ As plastic remains in the environment and weathers into smaller and smaller plastics (eventually becoming microplastics), hazardous chemicals often leach into the environments they pollute.⁷ Phasing out unnecessary EPA procurement of such plastics sets an important standard for all to follow. The National Strategy to Prevent Plastic Pollution is the appropriate place to commit to such a procurement policy.

While Section A2.5 acknowledges the need to evaluate the environmental justice and public health impacts on communities neighboring plastic production facilities, we believe it must go further to establish a community right to know of the chemical characteristics and hazards before the introduction and consumer market entry of new chemicals and plastics. Communities that surround plastic production facilities must have an established right to know from the EPA regarding the health and safety information of new petrochemical production.

The National Draft Strategy additionally establishes an objective to prevent trash and micro/nanoplastics from entering waterways and to remove escaped trash from the environment. Microplastics can leach chemical additives, damage cells within human lungs, and limit the growth of microscopic marine life.^{8 9 10} We fully support the EPA taking action to address micro/nanoplastic pollution. As the EPA explores expanded use of the Clean Water Act authorities to significantly reduce trash loadings into waterways under objective C1.2, it should commit to promptly initiate rulemaking in accordance with these findings. Additionally, multiple sections of Objective C call for further analyses, evaluations, and research into micro/nanoplastics, their harms, and how to mitigate their pollution. While supporting additional

⁴ A.C. Gore, V.A. Chappell, S.E. Fenton, J.A. Flaws, A. Nadal, G.S. Prins, J. Toppari, and R.T. Zoeller, “EDC-2: The Endocrine Society’s Second Scientific Statement on Endocrine-Disrupting Chemicals,” The Endocrine Society, National Institutes of Health, National Library of Medicine, February 24, 2015, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4702494/>

“Styrene,” National Institutes of Health, National Institute of Environmental Health Sciences, July 15, 2022, <https://www.niehs.nih.gov/health/topics/agents/styrene/index.cfm>

Alice Callahan, “The Types of Plastics Families Should Avoid,” *The New York Times*, Published April 17, 2020, Updated July 22, 2022, <https://www.nytimes.com/article/plastics-to-avoid.html>

⁵ Kala Senathirajah, Alison Kemp, Minna Sarristo, Shige Ishizuka, Thava Palanisami, “Polymer prioritization framework: A novel multi-criteria framework for source mapping and characterizing the environmental risk of plastic polymers,” *Journal of Hazardous Materials*, Vol. 429, May 5, 2022,

<https://www.sciencedirect.com/science/article/abs/pii/S0304389422001182?via%3Dihub>

⁶ A.C. Gore, V.A. Chappell, S.E. Fenton, J.A. Flaws, A. Nadal, G.S. Prins, J. Toppari, and R.T. Zoeller, “EDC-2: The Endocrine Society’s Second Scientific Statement on Endocrine-Disrupting Chemicals,” National Institutes of Health, National Library of Medicine, November 6, 2015, <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4702494/>
“Styrene,” National Institutes of Health, National Institute of Environmental Health Sciences, July 15, 2022, <https://www.niehs.nih.gov/health/topics/agents/styrene/index.cfm>

⁷ “Chemicals in Plastics – A Technical Report” United Nations Environment Programme, May 3, 2023, page xii, <https://wedocs.unep.org/bitstream/handle/20.500.11822/42366/Chemicals-in-Plastics.pdf?sequence=1&isAllowed=y>

⁸ Isabelle Gerretsen, “How microplastics are infiltrating the food you eat,” *BBC*, January 3, 2023, <https://www.bbc.com/future/article/20230103-how-plastic-is-getting-into-our-food>

⁹ Matt Simon, *A Poison Like No Other*, Island Press, 2022, page 135.

¹⁰ Tania Fitzgeorge-Balfour, “Microplastics hinder the growth of microscopic marine animals,” *Frontiers Science News*, August 17, 2021, <https://blog.frontiersin.org/2021/08/17/frontiers-marine-science-microplastics-slow-growth-marine-microscopic-zooplankton/>

research and analysis to better understand the harm and dangers of such pollution on human and environmental health, we already have sufficient information to act now rather than permitting research to delay immediate action. To ensure the findings from the EPA regarding micro/nanoplastics achieve effective change in plastic pollution, the EPA should include specific recommendations resultant and associated opportunities for rulemaking that limits micro/nanoplastic and microfiber pollution.

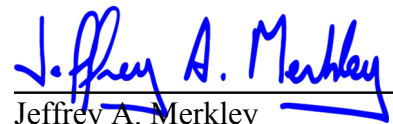
The Draft has demonstrated the many dangers of plastic to human and environmental health and some of the ways to mitigate this harm. To meaningfully protect communities across America, now EPA must include more actionable measures to actually reduce plastic waste and pollution. We ask that the EPA include actions, like those enumerated below, in the final version of the national strategy:

1. Eliminate the EPA's procurement of single-use plastics.
2. Reduce the EPA's procurement of PVC and polystyrene.
3. Establish a community right-to-know for the production of new chemicals for plastic production and new plastics.
4. Initiate rulemaking under the Clean Water Act to reduce trash loadings to minimize microplastics and microfibers in waterways.
5. Recommend associated and resultant opportunities for rulemaking to limit microplastics following the analyses and evaluations suggested in Objective C.

Sincerely,



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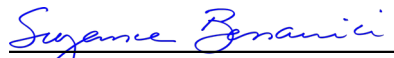
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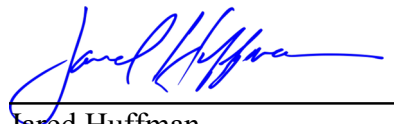
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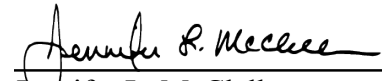
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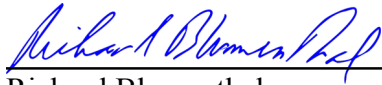
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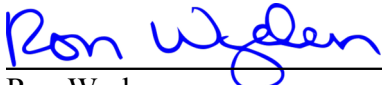
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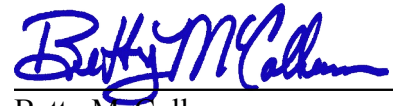
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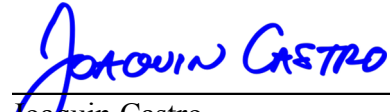
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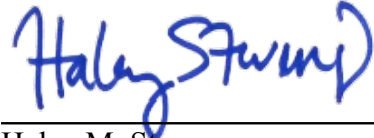
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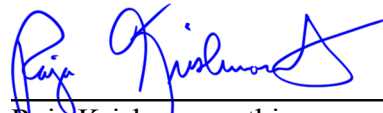
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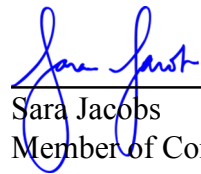
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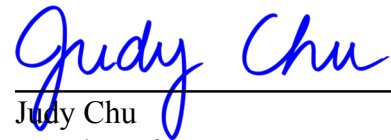
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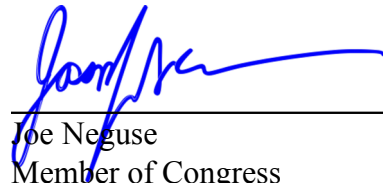
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