



February 26, 2024

Adina Torberntsson
Office of Acquisition Policy
General Services Administration
1800 F St NW
Washington, DC 20405

Re: GSAR Case 2022-G517, General Services Administration Acquisition Regulation; Reduction of Single-Use Plastic Packaging

Ms. Torberntsson:

The Coalition for Government Procurement (“the Coalition”) appreciates the opportunity to submit comments on GSAR Case 2022-G517, “Reduction of Single-Use Plastic Packaging.”

By way of background, the Coalition is a nonprofit association of firms that sell services, products, and solutions across the Federal Government. We represent member companies from a broad scope of industries as well as small, medium, and large Federal contractors. They collectively account for more than \$145 billion dollars in annual Federal sales generated through GSA’s Multiple Award Schedule program, the VA Federal Supply Schedules, governmentwide acquisition contracts, and other contracting activity. The Coalition is proud to have worked with Federal officials for over 40 years towards the mutual goal of common-sense acquisition.

The Coalition supports GSA’s efforts to reduce unnecessary single-use plastic packaging, a major waste stream and contributor to global pollution, in the Schedules program. We believe the proposed rule’s voluntary, incentive-based approach represents the most practical route to achieving this goal in support of the Administration’s broader sustainability goals while also meeting GSA customer agencies’ mission critical requirements.

As we noted in response to the advanced notice of proposed rulemaking GSA issued in July of 2022, many of GSA’s FSS contractors have programs to reduce the use of single-use plastic packaging. Highlighting SUP-free packaging in GSA Advantage! supports contractors’ existing efforts and incentivizes other commercial companies to do the same.

For GSA’s agency customers, the proposed rule encourages ordering activities to include a preference for SUP-free packaging. This creates an incentive for Federal contractors to transition to SUP-free packaging while preserving their ability to choose how to go to market and best serve their customers. It also avoids the risks associated with prohibiting certain types of packaging, which could affect Schedule contractors’ ability to meet mission critical requirements for their Federal customers.

The Department of Defense (DoD) continues to be the largest Federal agency customer of the MAS program. MIL-STD-2073, the Standard Practice for Military Packaging, is a frequent requirement for DoD orders under the Schedules program. MIL-STD-2073 outlines the standard processes for the

development of military packaging needed to protect materiel from extreme climate, corrosion, physical and mechanical damage, and other types of degradation while products are being stored, shipped, and handled in the Defense Transportation System. Schedule contractors may also be asked to comply with:

- Military Standard Transaction Reporting & Accountability Procedures
- Military Standard Requisitioning and Issue Procedures
- Military Marking for Shipment & Storage

It is critical that GSA considers these customer agency requirements and guidelines as it seeks to incentivize certain packaging practices under the Schedules program. Fortunately, the voluntary approach described in the proposed rule can accommodate both GSA's desired reduction in single-use plastics and the need for Schedule contractors to continue to support mission critical requirements like MIL-STD-2073. However, we would caution against any mandatory requirements under the Schedules program to eliminate certain types of plastics packaging due to packaging requirements that may be applied at the order level.

In regards to the proposed contract provisions, the Coalition recommends that GSA clarify GSAR 552.238-XXX to reflect whether it intends to provide one SUP-free packaging icon or two icons for different types of SUP-free packaging. The proposed revision to GSAR 552.238-88 and the proposed clause GSAR 552.238-YYY both reference only a single icon to identify SUP-free packaging in Advantage!. The proposed solicitation provision, GSAR 552.238-XXX, however, states that "SUP-free packaging *icons* for the types identified in paragraph (c), will be available on GSA Advantage!®, as applicable" (emphasis added), where the types identified in (c) are SUP-free brand packaging and SUP-free shipping packaging.

The Coalition recommends that GSA revise the language in GSAR 552.238-XXX to clarify that GSA will provide only one icon covering both types of SUP-free packaging, consistent with other language in the proposed rule. Advantage! icons are most effective when they provide a simple, easily recognizable symbol that communicates their purpose to customers. Providing two distinct icons for brand and shipping packaging may reduce their salience for customers and undermine their effectiveness, thereby reducing the positive impact of GSA's waste reduction efforts. Additional information about whether a product's SUP-free packaging is brand or shipping packaging could be placed within the item description on Advantage!.

Finally, the Coalition supports updating environmental tools like the Green Procurement Compilation, as suggested in the proposed rule, to provide customers with information about SUP-free solutions and to increase awareness of the SUP-free packaging icon in Advantage!.

Thank you again for the opportunity to submit these comments in response to GSAR Case: 2022-G517 on the Reduction of Single-Use Plastic Packaging. If you have any questions, please contact me at rwaldron@thecgp.org or (202) 331-0975.

Best regards,



Roger Waldron
President