



United States Department of the Interior

NATIONAL PARK SERVICE

1849 C Street, N.W.
Washington, D.C. 20240

IN REPLY REFER TO:

A5623 (0130)

DEC 14 2011

To: Regional Directors

From: Director *Janet L. Janus*

Subject: Recycling and Reduction of Disposable Plastic Bottles in Parks

The National Park Service has set very high standards to:

- reduce our carbon footprint and increase the sustainability of all parks
- look holistically at alternative fuels, vehicle fleet size and type
- convert lighting to reduce energy use and preserve the night sky
- recycle, compost, and use renewable energy sources (where appropriate)
- set LEED silver as the minimum standard for new construction

More than 100 parks have conducted climate friendly parks assessments. Most recently, we have begun efforts to increase choices for healthy and sustainable foods in our concessions facilities. A key element of *A Call to Action* is to "Go Green." You can see some of these actions online at <http://www.nps.gov/sustainability/>.

Sustainability is a signature effort for the National Park Service. We must be a visible exemplar of sustainability, so it is important that we move our sustainability program forward as an *organization*. While superintendents need some discretion to tailor implementation to local situations, it is not the purview of any one park to set policy.

The heart of our sustainability program is our comprehensive Green Parks Plan (GPP). The GPP will address water and energy use, green house gas emissions, reduction of waste streams, construction practices, as well as other issues, and sets goals that we will reach by 2016. The GPP is undergoing final review and will be released early next year.

In light of recent interest in one element of the GPP, we are issuing the attached specific policy on the reduction/recycling of disposable plastic water bottles. It allows superintendents to halt the sale of these bottles if they (1) complete a rigorous impact analysis including an assessment of the effects on visitor health and safety, (2) submit a request in writing to their regional director, and (3) receive the approval of their regional director.



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A5623 (0130)

DEC 14 2011

Policy Memorandum 11-03

To: Regional Directors

From: Director *Jonathan B. Jarvis*

Subject: Disposable Plastic Water Bottle Recycling and Reduction

A. Background

When considered on a life-cycle basis, the use of disposable plastic water bottles has significant environmental impact compared to the use of local tap water and refillable bottles. These impacts may be magnified in remote national parks because of the additional transportation, waste disposal, energy use, and litter removal factors inherent in these locations.

The issues surrounding plastic water bottles are complex. Banning the sale of water bottles in national parks has great symbolism, but runs counter to our healthy food initiative as it eliminates the healthiest choice for bottled drinks, leaving sugary drinks as a primary alternative. A ban could pose challenges for diabetics and others with health issues who come to a park expecting bottled water to be readily available. For parks without access to running water, filling stations for reusable bottles are impractical. A ban could affect visitor safety; proper hydration is key to planning a safe two-hour hike or a multi-day backcountry excursion. Even reasonably priced reusable water bottles may be out of reach for some visitors, especially those with large families.

For these reasons, the National Park Service will implement a disposable plastic water bottle recycling and reduction policy, with an option to eliminate sales on a park-by-park basis following an extensive review and with the prior approval of the regional director.

Such a policy will allow the NPS and park partners to reduce their environmental footprint, introduce visitors to green products and the concept of environmentally responsible purchasing, and give them the opportunity to take that environmental ethic home and apply it in their daily lives. It will also be a significant step in reducing our carbon footprint and meeting *A Call to Action* Goal #23, Go Green.

B. Policy and Requirements

Recycling: Parks are strongly encouraged to have a robust recycling program. The plastics found in disposable water bottles are fully recyclable, and parks should have ample and well designed, distributed, and marked collection facilities. The work of collecting, sorting, and

transporting recyclables from parks to regional recycling centers may not always “pay for itself,” but it is still the right thing to do.

Reduction: Parks are strongly encouraged to reduce the sale of disposable plastic water bottles through visitor education on the environmental impact of purchasing decisions and the availability of reasonably priced reusable bottles which can be filled at water fountains or bottle refill stations.

Elimination: Where appropriate, superintendents may request approval from their regional director to eliminate the sale of water in disposable plastic bottles by analyzing and addressing the following factors—in writing:

- Amount of waste eliminated and pros/cons to overall park operations
- Infrastructure costs and funding source(s) for filling stations
- Contractual implications on concessioners, including considerations of new leaseholder surrender interest or possessory interest
- Operational costs of filling stations including utilities and regular public health testing
- Cost and availability of BPA-free reusable containers
- Effect on concessioner and cooperating association sales revenue
- Availability of water within concession food service operations
- Visitor education in the park and online so that visitors may come prepared with their own water bottles
- Results of consultation with NPS Public Health Office
- A sign plan so that visitors can easily find filling stations
- Safety considerations for visitors who may resort to not carrying enough water or drinking from surface water sources with potential exposure to disease
- A system for annual evaluation of the program, including public response, visitor satisfaction, buying behavior, public safety, and plastic collection rates
- Results of consultation with concessioners and cooperating associations
- Timeline of phase in period

Education: Parks must develop a proactive visitor education strategy that addresses visitor expectations and explains the rationale for whatever plastic bottle reduction, recycling, or elimination effort is implemented.

Disposable plastic bottle recycling, reduction, or elimination decisions should be implemented at all applicable operations so there is consistency throughout the park and parity from one operation to the next. These procedures should be incorporated into the concessioner operating plan, cooperating association scope of sales, and other organizations operating within the park.

C. Existing Activities

Parks that have already successfully implemented programs to install refill stations and eliminate the sale of disposable plastic beverage containers may continue, but must address the above factors—in writing—to their regional director, including a system for annual evaluation.

D. New Concession Contracts

With the approval of the regional director and after conducting the analysis described above, parks may prohibit the sale of disposable water bottles as a term of a new concession contract.

E. Monitoring and Continuous Improvement

This policy will be monitored to determine its park and Servicewide environmental impact, visitor welfare, acceptance, and support, and effects on concessioners and cooperating associations. The NPS will also continue to reach out to producers and suppliers and the scientific community to gather information on environmental impacts, new technologies and industry best practices and may pilot new ideas where appropriate. The disposable water bottle alternatives strategy will be revisited periodically based on these data to determine if a change in the strategy is desirable or necessary.

F. Limitation

This policy is intended only to improve the internal management of the NPS, and is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or equity by a party against the United States, its departments, agencies, instrumentalities or entities, its officers or employees, or any other person.

G. Related Policies

This policy supplements other policies relating to environmental leadership, waste reduction, and recycling, particularly those found in sections 1.8, 9.1.6, and 10.2.4.5 of *Management Policies 2006*.

H. Further Information

For information on this policy or other tools and resources, please contact [Kurt Rausch](#), Commercial Services Program at 202-513-7202 or [Shawn Norton](#), Park Facility Management Division at 202-354-1835.

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