



February 26, 2024

Regulatory Secretariat Division
U.S. General Services Administration
1800 F St, NW
Washington, DC 20405

Re: Docket ID GSAR Case 2022-G517, Docket No. GSA-GSAR-2023-0028

Dear Adina Torberntsson,

We, the undersigned Surfrider Foundation Ocean Friendly Restaurants (OFR), submit the following comments regarding the General Services Administration (GSA)'s proposed rulemaking to reduce single-use plastic packaging.

While the proposed rule is a step in addressing plastic pollution, we believe GSA, the largest purchaser of goods and services in the United States, can do more to reduce single-use plastic at the source. We request that the GSA include reduction of all single-use plastic products, not just packaging, in the final rulemaking, as these are items [commonly found](#) polluting our beloved beaches and waterways.

Most importantly, we recommend that GSA includes metrics for determining plastic reduction as well as mandates for switching to plastic-free products. Each restaurant represented here is required to follow a set of criteria to be a part of the [Ocean Friendly Restaurants Program](#). The criteria focuses on shifting away from single-use plastic, especially items such as bags, bottles, straws, utensils, and expanded polystyrene foam. Currently, 554 restaurants participate in the program spanning 28 states and Puerto Rico. We estimate that, collectively, OFRs serve over 101,000 single-use plastic free meals a day. We believe all government agencies should be required to reduce certain single-use plastic products and packaging. If small restaurants like us can do it, then the General Services Administration can, too.

With GSA's purchasing power, there is an opportunity to not only reduce demand for single-use plastics, but to also drive the markets toward reusable and other plastic-free materials. It's no secret that plastic-free products are more expensive than single-use plastic products. Despite this, many of our OFRs have seen cost savings by making the switch to plastic-free options.

One OFR in Florida saves over \$3,000 a year by only offering paper straws upon request. Another OFR in California saves \$900-2,000 a year by running a glass bottle return system after reaching their break-even point. This shows that single-use plastic reduction can be good for business, but the initial purchase of plastic-free products is still a hurdle for most restaurants. With GSA's help, plastic-free products will become more readily available and thereafter more affordable for small businesses.

The General Services Administration has the opportunity and responsibility to turn the tide on plastic pollution. Please take our comments into consideration when finalizing the proposed rulemaking. Visit surfrider.org/ofr to learn more about the Surfrider Foundation's Ocean Friendly Restaurants Program.

Sincerely,

25 Lusk	Moofish	Pacific Catch - Walnut
264 Fresco	Mother's Cantina	Creek
American Flatbread	Naked Cafe	Pacific Catch Campbell
Aqua Beachfront Bar	OceanCiders	Pasta Sisters
Barrel Head Brewhouse	Off the Wall Craft Beer &	Pier 23 Cafe
Big Island Brewhaus, LLC	Wine	Pump Coffee
Birdsong Brewing Co	Pacific Catch - Corte	Revel
Bliss	Madera	Rise Up Coffee - Rehoboth
Cesarina Pasta LLC	Pacific Catch - Cupertino	Beach
Chicory Restaurant	Pacific Catch - Dublin	Scopo Divino
Essensia Restaurant & Bar	Pacific Catch - La Jolla	Sound by the Sea
Half Moon Bay Brewing	Pacific Catch - Mountain	Tastee Tiki
Company	View	The Carriage House
Hog Island Oyster Co.	Pacific Catch - Palo Alto	The Giddy Goat Coffee
Jus' Poke	Pacific Catch - San Mateo	Roasters
Kitchen33 and Bakery	Pacific Catch - Santa Clara	The Point Crab House and
La Méditerranée	Pacific Catch - SF 9th Ave	Grill
LJ Crafted Wines	Pacific Catch - SF	The Press Room
Lost Marbles Brewpub	Chestnut St.	The Tiny Turtle
Mayflour	Pacific Catch - Sunnyvale	The Workman's Friend
Miami Yacht Club	Pacific Catch - Tustin	Veg'd
Mnemonic Coffee		