Request for Information (RFI) on

Upcoming Requirements on Circularity and Durability of Goods in Public Services and Procurement Canada (PSPC) Procurements

**1.0 Context**

The Government of Canada is committed to being a global leader in reducing greenhouse gas (GHG) emissions, waste and pollution. Over the years, Canada has committed to numerous sustainability and environmental goals. Recent international examples include the [Ocean Plastics Charter](https://www.canada.ca/en/environment-climate-change/services/managing-reducing-waste/international-commitments/ocean-plastics-charter.html) and the first universal and legally binding global climate deal: [The Paris Agreement](https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement). Domestic examples include the [Pan Canadian Framework on Clean Growth and Climate Change](https://www.canada.ca/en/services/environment/weather/climatechange/pan-canadian-framework.html) and the [Canada-wide Strategy for Zero Plastic Waste](https://www.canada.ca/en/services/environment/pollution-waste-management/zero-plastic-waste/canada-action.html).

To lead by example, the Government of Canada has also made a number of environmental commitments relating to government operations through the [Federal Sustainable Development Strategy](https://www.fsds-sfdd.ca/index.html), the [Greening Government Strategy](https://www.canada.ca/en/treasury-board-secretariat/services/innovation/greening-government/strategy.html) and the [Government of Canada Actions on plastic waste in federal operations](https://www.canada.ca/en/treasury-board-secretariat/services/innovation/greening-government/government-canada-actions-plastic-waste-federal-operations.html).

Currently, the way most materials and products move through our economy is linear: we extract natural resources, we make them into products and then we throw them away at their end of life. This is referred as a “take-make-waste” model. In contrast, in a circular economy the lifecycle of materials and products is extended as long as possible. It follows a “make-use-return” model so that materials and products are collected and then reused, repaired, remanufactured or recycled at their end of life.

Federal, provincial and territorial governments are working together through the Canadian Council of Ministers of the Environment (CCME) to move Canada towards a circular economy, starting with plastics. The Government of Canada’s vision is a zero plastic waste future where plastics stay in the economy and out of landfills and the environment.

Extending the life of products we buy and implementing circular economy principles within the federal procurement decision-making process would contribute to achieving multiple economic and environmental objectives including reducing GHG and waste.

As part of its implementation of the comprehensive federal agenda on zero plastic waste and in support of the circular economy, the Government also intends to develop a national strategy to encourage the remanufacturing of products and other value-retention processes (VRPs) in Canada. As a first step, a socio-economic and environmental study is currently underway to gather baseline information. Interested stakeholders can complete an online survey available at <https://www.remancan.com/>.

**2.0 Standard durability language development**

The Government of Canada is exploring options to develop standard language related to the circularity and durability of goods in applicable Public Services and Procurement Canada (PSPC) procurement instruments. Accessibility, health, national safety and security needs will be taken into consideration in the development of this standard language.

Through this Request for Information (RFI), PSPC and its partner departments are informing stakeholders, including industry and suppliers, of the Government of Canada’s intention to adopt requirements for durability, circularity and life extension strategies in its procurement.

Requirements that could be integrated into procurement to promote circularity and durability of products include but are not limited to:

* 3.1 Extended warranty
* 3.2 Improved repairability
* 3.3 Improved reuse or recyclability
* 3.4 Use of recycled content
* 3.5 Remanufactured and refurbished products

As such, PSPC is seeking to understand suppliers’ readiness to comply with these requirements, as well as the potential challenges that these requirements may introduce in the procurement process.

**3.0 Circular procurement and Durability of Goods working requirements**

This section provides **working** **definitions** and **sample requirements** for the circularity and durability of goods that have been prepared for this RFI.

**3.1 Extended warranty**

The Government of Canada may request extended warranty periods to extend the life of the products it procures, when applicable. Current warranty periods could be extended for products using the already developed and available standard clause [K0029C](https://buyandsell.gc.ca/policy-and-guidelines/standard-acquisition-clauses-and-conditions-manual/5/K/K0029C/2).

**3.2 Requiring improved repairability**

The Government of Canada may request improved repairability for the products it procures, when applicable. This could include compliance with repairability design criteria, standards or certifications.

A number of potential requirements for repairability are presented below.

3.2.1 Design for disassembly - repair

Examples of requirements related to design for disassembly include:

* Products shall be designed in a modular fashion to facilitate the repair or replacement of components that are subject to wear or breakage or likely to be upgraded. (Source: *BIFMA (AINSI) E3-2019*)
* Disassembly is possible with standard tools and does not require special training and product disassembly instructions are publicly available. (Source: *BIFMA (AINSI) E3-2019*)
* External enclosure shall be removable with the use of commonly available tools. Removal of external enclosures shall not causes damage that would preclude reuse or refurbishment of the product. (Source: *IEEE Std 1680.1TM-2018*)

3.2.2 Design for ease of maintenance

This could include potential requirements:

* products be designed in such a manner that maintenance can be undertaken on site
* component parts be easily accessible under common working conditions, and non-organic solvents or other chemicals are not required
* products be capable of being repaired on-site without the use of solvents
* cleaning of the product require the use of organic solvents only and that information must be provided on the cleaning and care of the product[[1]](#footnote-1)

3.2.3 Spare parts availability

The Government of Canada may request that spare parts will be made available for a longer period than the warranty period in order to extend the life of its products.

**3.3 Requiring improved reuse or recyclability**

The Government of Canada may request improved end-of-life management for products. A number of potential requirements to improve end-of-life management are provided below include:

3.3.1 Design for disassembly - reuse or recycling

This can be defined as a characteristic of a product's design that enables the product to be taken apart at the end of its useful life in such a way that allows components and parts to be reused, recycled, recovered for energy or, in some other way, diverted from the waste stream. (Source: *CAN/CSA-ISO 14021*)

Following the above, two definitions for recyclability are:

* Capable of being diverted from the waste stream through available processes and programmes and can be collected, processed and returned to use in the form of raw materials or products. (Source: *CAN/CSA-ISO 14021, Clause 7.7.1*)
* A material or component is recyclable if its successful post-consumer collection, sorting, and recycling is proven to work in practice and at scale. This means that there is an existing (collection, sorting and recycling) system in place that actually recycles the material and that covers significant and relevant geographical areas as measured by population size. (Source: adapted from the EMF New Plastics Economy Global Commitment)

3.3.2 Requesting product parts labelling

This could include a requirement that product parts are labeled or otherwise identified to facilitate separation by material content, and identification of any materials that may require special handling. There could be exclusions for safety, legal or technical requirements. (Source: Adapted from *IEEE Std 1680.1TM-2018*)

More specific requirements for plastics could include:

* All plastic parts over 25 g need to be clearly marked with material type in accordance with ISO 11469/1043, excluding optical parts. (Source: *IEEE Std 1680.1TM-2018*)
* All plastic parts over 100g do not have an adhesive, coating, paint, or finish that is not compatible with recycling. Plastic parts with more than 25% post-consumer recycled content are exempt from this requirement. (Source: adapted from *IEEE Std 1680.1TM-2018*)

3.3.3 Requesting non-hazardous and non-toxic material

The Government of Canada may request that suppliers comply with all applicable environmental and health and safety regulations that govern toxic and hazardous substance use, and also exceed these requirements for specific products to reduce potential complications in product reuse and/or recycling.

The relevant Acts and Regulations include:

* [Hazardous Products Regulations](https://laws-lois.justice.gc.ca/eng/regulations/SOR-2015-17/)
* [Hazardous Materials Information Review Act](https://laws-lois.justice.gc.ca/eng/acts/H-2.7/page-3.html)
* [Hazardous Materials Information Review Regulations](https://laws-lois.justice.gc.ca/eng/regulations/SOR-88-456/index.html)
* [Prohibition of Certain Toxic Substances Regulations](https://pollution-waste.canada.ca/environmental-protection-registry/regulations/view?id=114)

3.3.4 Requesting take-back program for end-of-life management

The Government of Canada may require suppliers to offer end-of-life management options for some or all of their products, such as a product take-back program. Through these programs, suppliers collect used products for reuse, repair, refurbishment and/or recycling. This could include reporting on how suppliers manage the parts or the products they collect.

3.3.5 Requesting end-of-life information

This could include asking manufacturers to make additional product information available to reuse and recycling facilities, via a central information source or a website. For example, information identifying the presence and location of all materials and components that require selective treatment.

The suppliers would need to share the URL or the central information source used. (Source: Adapted from *IEEE Std 1680.1TM-2018*)

**3.4 Requiring recycled content**

The Government of Canada is considering adopting minimum recycled content requirements for some or all of the materials and/or products that it procures. These would likely vary by product and material type and would need to comply with relevant regulations (e.g. Prohibition of Certain Toxic Substances Regulations). Related definitions are provided below:

* **Recycled content:** Proportion, by mass, of recycled material in a product or packaging. Only pre-consumer and post-consumer materials shall be considered as recycled content, consistent with the following usage of terms. (Source: *CAN/CSA-ISO 14021, Clause 7.8.1.1*)
* **Pre-consumer material:** Material diverted from the waste stream during a manufacturing process. Excluded is reutilization of materials such as rework, regrind or scrap generated in a process and capable of being reclaimed within the same process that generated it. (Source: *CAN/CSA-ISO 14021, Clause 7.8.1.1*)
* **Post-consumer material**: Material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product which can no longer be used for its intended purpose. This includes returns of material from the distribution chain. (Source: *CAN/CSA-ISO 14021, Clause 7.8.1.1*)

**3.5 Requiring repaired, remanufactured or refurbished material**

The Government of Canada is considering adopting requirements for the purchase of repaired, remanufactured or refurbished products, components or materials.

**4.0 Participation**

Below you will find 16 questions that we request you consider and respond to by January 31, 2020. This RFI will officially close as of that date, however, we welcome any information that you wish to share afterwards. Please send responses to:

TPSGC.PAPiloteSocioEconomique-APSocioEconomicPilot.PWGSC@tpsgc-pwgsc.gc.ca

**5.0 RFI Questions**

For each question, **please specify for which category(ies) of goods you wish to comment on**. Please refer to Appendix A to select the applicable tangible good category(ies) based on the Good and Services Identification Number (GSIN).

**Question 1**: Do you currently offer **extended warranties** (section 3.1) on your goods? If yes, please describe; if no, what are the barriers that prevent your business from doing so? What would be the impact on your product/business/price and on your desire to do business with the Government of Canada if these types of extended warranties were implemented?

**Question 2**: Do you currently integrate **design for disassembly-repair** (section 3.2.1) considerations into your product design? If yes, please describe; if no, what are the barriers that prevent your business from doing so? What would be the impact on your product/business/price and on your desire to do business with the Government of Canada if these types of design for disassembly-repair requirements were implemented?

**Question 3**: Do you currently integrate **ease of maintenance** (section 3.2.2) considerations into your product design? If yes, please describe; if no, what are the barriers that prevent your business from doing so? What would the impact be on your product/business/price and on your desire to do business with the Government of Canada if the **ease of maintenance** requirements were implemented?

**Question 4:** Do you currently offer longer **spare parts availability** (section 3.2.3) for your products? If yes, please describe; if no, what are the barriers that prevent your business from doing so? In addition, what would the impact be on your product/business/price and on your desire to do business with the Government of Canada if suppliers were required to make **spare parts available** for a longer period?

**Question 5**: Do you have any other comments, suggestions or feedback on how to improve the **repairability (Section 3.2)** of the products the Government of Canada acquires?

**Question 6**: Do you currently integrate **design for disassembly-reuse or recycling** (section 3.3.1) considerations into the designing of your products? If yes, please describe; if no, what are the barriers that prevent your business from doing so? What would the impact be on your product/business/price and on your desire to do business with the Government of Canada if the **design for disassembly-reuse or recycling** requirements were implemented?

**Question 7:** Do you currently label all your component parts and/or identify materials that might require special handling (section 3.3.2)? If yes, please describe; if not, what are the barriers that prevent your business from doing so? What would the impact be on your product/business/price and on your desire to do business with the Government of Canada if the **product parts labelling** requirements were implemented?

**Question 8:** What would the impact be on your product/business/price and on your desire to do business with the Government of Canada if **non-hazardous and non-toxic material** (section 3.3.3) requirements were implemented?

**Question 9**: Do you currently offer any end-of-life management options (such as a **product** **take-back** service) (section 3.3.4)? If yes, please describe; if not, what are the barriers that prevent your business from doing so? What would the impact be on your product/business/price and on your desire to do business with the Government of Canada if the **take-back program** requirements were implemented?

**Question 10**: Do you currently make available information to facilitate reuse and recycling at **end of life (section 3.3.5)?** If yes, please describe. If not, what are the barriers that prevent your business from doing so? What would the impact be on your product/business/price and on your desire to do business with the Government of Canada if **end-of-life information** requirements were implemented?

### **Question 11:** Do you currently include any **recycled content** (section 3.4) in your products? If yes, from what source, what is the percentage of recycled content included?If no, what are the barriers that prevent your business from including recycled content? What would the impact be on your product/business/price and on your desire to do business with the Government of Canada if minimum **recycled content** requirements were implemented?

**Question 12**: Do you suggest the Government of Canada use **official programs or third party certifications for:**

1. the take-back requirements of its purchased products (Section 3.3.4)
2. recycled content requirements (section 3.4)
3. repaired, remanufactured or refurbished products or services (3.5)
4. Other circularity or durability of goods requirements

 If yes, define the program or certification suggested.

### **Question 13:** Do you currently offer or use any **repaired, remanufactured or refurbished** products, components or materials (section 3.5)? If yes, please describe. If no, what are the barriers that prevent your business from doing so? What would the impact be on your product/business/price and on your desire to do business with the Government of Canada if **repair, remanufacture or refurbish** requirements were implemented?

**Question 14**: If the Government of Canada were to require the purchase of repaired, remanufactured or refurbished products, what would be the impact on the **warranty period or cost**?

**Question 15:** Do you have any other comments, suggestions or feedback on the working definitions and sample requirements provided in Section 3?

**Question 16:** Do you have any other comments, suggestions or feedback on circularity or durability of goods in the Government of Canada procurement that you would like to share?

The Government of Canada would like to thank you in advance for your participation!

Annex A

List of applicable tangible Good Identification Number (GSIN) categories

|  |  |
| --- | --- |
| GSIN  |  Description |
| N10 | Weapon and Ammunition |
| N12 | Fire Control Systems |
| N15 | Fixed and Rotary Winged Aircraft |
| N16 | Aircraft Accessories and Components |
| N17 | Aircraft Landing and Ground Handling Equipme |
| N19 | Ships, Small Craft, Pontoons & Floating Dock |
| N20 | Ship and Marine Equipment |
| N23 | Ground Effect Vehicles, Motor Vehicles, Trai |
| N24 | Tractors |
| N25 | Vehicular Components Miscellaneous |
| N26 | Tires and Tubes |
| N28 | Engines, Turbines and Components |
| N29 | Engine Accessories Non-Aircraft |
| N34 | Machine Tools, Furnaces, Electric, Gas, Oil, |
| N36 | Photocopying, Printing and Food Products Equ |
| N37 | Lawn, Gardening and Agricultural Equipment |
| N38 | Truck and Tractor Equipment |
| N39 | Material Handling Equipment |
| N41 | Refrigeration, Air Conditioning and Air Circ |
| N42 | Firefighting Rescue and Safety Equipment |
| N43 | Compressors and Pumps |
| N44 | Air Purification Equipment |
| N45 | Plumbing, Heating and Sanitation Equipment |
| N46 | Water Purification and Sewage Treatment Equi |
| N47 | Pipe, Tubing, Hose, Fittings |
| N51 | Hand Tools |
| N53 | Hardware (Nuts, Bolts, Etc.) and Abrasives |
| N54 | Prefabricated Structures, Bridges, Storage T |
| N55 | Lumber and Related Materials |
| N56 | Construction and Building Materials |
| N58 | Telecommunications Equipment and Accessories |
| N59 | Electrical and Electronic Equipment Componen |
| N61 | Electric Wire, and Power and Distribution Eq |
| N62 | Lighting Fixtures and Lamps |
| N63 | Alarm and Signal Systems |
| N65 | Medical Kits, Equipment, Drugs and Supplies |
| N66 | Instruments and Laboratory Equipment |
| N67 | Photographic Equipment |
| N68 | Chemicals, Chemical Products and Gases |
| N69 | Training Aids and Devices |
| N70 | IT Equipment, Software, Supplies and Support |
| N71 | Office Furniture |
| N72 | Household and Commercial Furnishings and App |
| N73 | Food Preparation and Serving Equipment |
| N74 | Office Machines, Text Processing Systems and |
| N75 | Office Supplies and Devices |
| N78 | Recreational and Athletic Equipment |
| N79 | Cleaning Equipment and Supplies |
| N80 | Paints, Varnishes, Adhesives and Related Pro |
| N81 | Containers, Packaging and Packing Supplies |
| N83 | Textiles, Leather, Furs, Apparel, Shoes, Ten |
| N84 | Clothing, Accessories and Insignia |
| N85 | Personal Toiletry Articles |
| N87 | Seeds, Sod, and Nursery Stock |
| N88 | Live Animals |
| N89 | Food and Beverages |
| N91 | Fuels, Lubricants, Oils and Waxes |
| N93 | Non-Metallic Fabricated Materials such as Pa |
| N95 | Non-Ferrous Materials Products. |
| N99 | Miscellaneous |

Annex B

 Questions in a table format

|  |  |  |  |
| --- | --- | --- | --- |
| **Question Number** | **Title** | **Question** | **Answer** |
| 1 | Extended warranties | Do you currently offer **extended warranties** (section 3.1) on your goods? If yes, please describe; if no, what are the barriers that prevent your business from doing so? What would be the impact on your product/business/price and on your desire to do business with the Government of Canada if these types of extended warranties were implemented? |  |
| 2 | Design for disassembly-repair | Do you currently integrate **design for disassembly-repair** (section 3.2.1) considerations into your product design? If yes, please describe; if no, what are the barriers that prevent your business from doing so? What would be the impact on your product/business/price and on your desire to do business with the Government of Canada if these types of design for disassembly-repair requirements were implemented?  |  |
| 3 | Ease of maintenance | Do you currently integrate **ease of maintenance** (section 3.2.2) considerations into your product design? If yes, please describe; if no, what are the barriers that prevent your business from doing so? What would the impact be on your product/business/price and on your desire to do business with the Government of Canada if the **ease of maintenance** requirements were implemented? |  |
| 4 | Spare parts availability | Do you currently offer longer **spare parts availability** (section 3.2.3) for your products? If yes, please describe; if no, what are the barriers that prevent your business from doing so? In addition, what would the impact be on your product/business/price and on your desire to do business with the Government of Canada if suppliers were required to make **spare parts available** for a longer period? |  |
| 5 | Repairability | Do you have any other comments, suggestions or feedback on how to improve the **repairability (Section 3.2)** of the products the Government of Canada acquires? |  |
| 6 | Design for disassembly-reuse or recycling | Do you currently integrate **design for disassembly-reuse or recycling** (section 3.3.1) considerations into the designing of your products? If yes, please describe; if no, what are the barriers that prevent your business from doing so? What would the impact be on your product/business/price and on your desire to do business with the Government of Canada if the **design for disassembly-reuse or recycling** requirements were implemented? |  |
| 7 | Product parts labelling | Do you currently label all your component parts and/or identify materials that might require special handling (section 3.3.2)? If yes, please describe; if not, what are the barriers that prevent your business from doing so? What would the impact be on your product/business/price and on your desire to do business with the Government of Canada if the **product parts labelling** requirements were implemented? |  |
| 8 | Non-hazardous and non-toxic material | What would the impact be on your product/business/price and on your desire to do business with the Government of Canada if **non-hazardous and non-toxic material** (section 3.3.3) requirements were implemented? |  |
| 9 | Take-back program | Do you currently offer any end-of-life management options (such as a **product** **take-back** service) (section 3.3.4)? If yes, please describe; if not, what are the barriers that prevent your business from doing so? What would the impact be on your product/business/price and on your desire to do business with the Government of Canada if the **take-back program** requirements were implemented? |  |
| 10 | End of life | Do you currently make available information to facilitate reuse and recycling at **end of life (section 3.3.5)?** If yes, please describe. If not, what are the barriers that prevent your business from doing so? What would the impact be on your product/business/price and on your desire to do business with the Government of Canada if **end-of-life information** requirements were implemented? |  |
| 11 | Recycled content | Do you currently include any **recycled content** (section 3.4) in your products? If yes, from what source, what is the percentage of recycled content included?If no, what are the barriers that prevent your business from including recycled content? What would the impact be on your product/business/price and on your desire to do business with the Government of Canada if minimum **recycled content** requirements were implemented? |  |
| 12 | Official programs or third party certifications | Do you suggest the Government of Canada use **official programs or third party certifications** for take-back program, recycled content, repaired, remanufactured or refurbished products or services or other circularity or durability of goods |  |
| 13 | Repaired, remanufactured or refurbished | Do you currently offer or use any **repaired, remanufactured or refurbished** products, components or materials (section 3.5)? If yes, please describe. If no, what are the barriers that prevent your business from doing so? What would the impact be on your product/business/price and on your desire to do business with the Government of Canada if **repair, remanufacture or refurbish** requirements were implemented? |  |
| 14 | Warranty period or cost | If the Government of Canada were to require the purchase of repaired, remanufactured or refurbished products, what would be the impact on the **warranty period or cost**? |  |
| 15 | Other comments on section 3 | Do you have any other comments, suggestions or feedback on the working definitions and sample requirements provided in Section 3? |  |
| 16 | Other comments | Do you have any other comments, suggestions or feedback on circularity or durability of goods in the Government of Canada procurement that you would like to share? |  |

The Government of Canada would like to thank you in advance for your participation!

1. (Source: adapted from <https://www.tpsgc-pwgsc.gc.ca/app-acq/rccgmb-gofacm/mobilierexigences-furniturerequirements-eng.html>) [↑](#footnote-ref-1)