



CITY OF PORTLAND
OFFICE OF MANAGEMENT AND FINANCE

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June 7, 2018

Thank you to everyone who provided feedback on the update to the City's Sustainable Procurement Policy!

Attached you will find:

1. A summary of all the external stakeholder feedback received during the April 2018 comment period and the associated responses from the Sustainable Procurement Program Coordinator.
2. A copy of the final draft of the Sustainable Procurement Policy update.

In terms of next steps, this final draft of the Policy update is currently being reviewed by City Bureau Directors for final comment. It is possible that additional edits may be made to the Policy update in response to Director feedback. Yet, I anticipate that we will send the Policy update for City Council approval in late July 2018.

If you have questions about the response to your feedback and/or the edits made to the Policy update, please contact me.

Sincerely,

Stacey Foreman

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To help ensure equal access to programs, services and activities, the Office of Management & Finance will reasonably modify policies/procedures and provide auxiliary aids/services to persons with disabilities upon request.

Policy Section: Purpose

Comment/Feedback	Response
Change: A short explanation of the def of sustainability and brief desc of the triple bottom line --a graphic or jpeg may assist this so it can be tied back to the SPLC work.	Considering that we explicitly acknowledge triple-bottom impacts, decided a definition would be repetitive.
Change: Consider "benefits" in addition to "impacts"	Term "impacts" is used for both beneficial and adverse. Unless otherwise specified, "impacts" is assumed to mean positive and adverse.
Change: Mention the collaboration with stakeholders as part of "taking appropriate responsibility".	Added
Comment: leveraging purchase power to influence markets is a very important facet of this overall policy.	n/a
Comment: excellent; succinct which is great and missing in subsequent sections	n/a

Policy Section: Applicability

Comment/Feedback	Response
Comment: Great for what you purchase, but we purchase so many human services we often also include culturally responsive/specific services as a part of this framework	Added language to say the policy applies to all types of City-Funded procurements
Change: applies to all City employees and departments.	Added language to say the policy applies to all divisions
Change: bit vague; could be more specific about the types of procurements; goods/services and capital; or only some; all large and small or only small; some summary would be helpful; ideally don't make readers go to two places for one piece of information	Added language to say the policy applies to all divisions

Policy Section: Policy Statement

Comment/Feedback	Response
Comment: this is brief and all encompassing--change could happen and still this umbrella statement would include new or emerging sustainability considerations	n/a
Change: I would consider expanding the focus from just what employees will do to what suppliers will also do as well; meet some minimum standards; transparently reveal risks with their products; etc.	Earlier internal stakeholder workgroups debated this point and decided to focus policy statement on City employees. Policy work related to suppliers is reflected in best practices that employees undertake.

Policy Section: Goals (section removed - see comments below)

Comment/Feedback	Response
Change: Be a leader in the community/for other agencies	Added to Policy Statement (last line)
Comment: If these were vetted with stakeholders-fantastic it will be more easily adopted	n/a
Change: Perhaps consider if the goals are SMART for the City of Portland?	SMART approach will be considered when developing KPIs/metrics.
Comment: Again, the power to influence markets is incredibly important.	n/a
Change: Can any of your goals be quantitative? You've already measured your supply chain impacts. Can that act as a baseline measurement and then set goals to decrease impacts from there. Consider actual reduction targets or % reduction (jp),. 4.2: Consider adding another goal: Contribute to improving supplier performance for properly and accurately labeling "sustainable" products (jmr), 4.3: Can the connection to the Climate Action Plan be stronger here? Can you have "action" within the Climate Action Plan that set goals for procurement? How can these two policies complement each other? (jp), 4.3: ..and develop short term goals, using defined metrics (#10) in support of the 2030 Environmental Performance Objectives (jmr)	The spend analysis approach is not a good tool for measuring progress since the results can vary not by intensity of impact, but just by volume of spend. In other words, if I spend \$1 million on green cleaning supplies one year instead of conventional cleaning supplies the previous year, the spend analysis approach will not register any impact difference. The Program will be working on developing metrics/KPIs that can be measured over time (section 10).
Change: bit vague; might again summarize some of the most important corp sustainability goals to be illustrative; packaging and resource use; job creation; GHG emissions	Ended up removing this section since it was duplicative of Purpose and Policy Statement.

Policy Section: Sustainable Procurement Guiding Principles

Comment/Feedback	Response
Comment: Not everyone will know terms, like "3D", but definitions links help	n/a
Comment: Good	n/a
Change: Change "toxins" to "toxics"	"Toxin" is the noun, so kept as is. Updated other places in document where toxics was incorrectly used as a noun.
Change: I have never heard ESE referred to as "3D" thinking - perhaps using the term "triple bottom line" will be more familiar to readers. I also recommend adding a statement about scientific credibility to #4 Take a Life Cycle Perspective.	"3D" was vetted internally and chosen to try to make sustainability language more palatable to those who are not immersed in it. Also, the Guiding Principles will be used to anchor Program communications. It is unclear to me the link between "scientific credibility" and #4 as written. No changes made.
Change: 5.6: I suggest moving to #4. The flow will be better if "grouped" with current #3 & 4; consider alternative: avoid toxins, as they are harmful to people and animals, and can contaminate the air, water and soil	Since most of this language was previously vetted by internal stakeholders and the Principles will primarily be for internal education/communications, decided to leave as is.
Change: In our opinion, the draft policy is overall very good, particularly regarding environmental issues such as Greenhouse Gases and Toxics reduction. It needs significantly greater specificity regarding the social and economic elements of sustainability, especially regarding workers in the Portland metropolitan area and close to home. In this vein, we recommend adding to item 6, Ensure Health and Safety: "Promote workplace health and safety by considering suppliers' occupational health and safety record and impacts on workers."	The Guiding Principles are intentionally big-picture. They reflect values, not specific actions/rules and serve as a compass for decision making. As such, the Think in 3D (hidden costs to people) , Uphold Accountability (ethical behavior), and Ensure Health & Safety Principles support worker safety principles.

<p>Change: Scope of Wood Procurement within the Policy Forests represent 48% of Oregon’s land area. Impacts of wood procurement and forest management are significant to human health, water quality, and the ecological benefits potentially secured from these landscapes. Forests are one of Oregon’s great assets and warrant higher-level consideration within the existing policy. Sustainable Northwest requests the city reference a wood procurement preference at a high level and include specific reference in sections on Toxic Reduction, Fair and Safe Supply Chains, and Procurement Tools. Wood Procurement Preference Not all wood is created equal and not all wood sourcing has equal impact toward achieving the City of Portland's sustainability goals. A forest's ecological health and the ecological values provided by the source forest are vital components of measuring the sustainability equation related to wood. However, regionally sourced wood from ANY LEGAL SOURCE (other than forestland that is being converted to non-forest use) encourages continued use of land as forestland. Maintaining forestland has long-term ecological value on its own merit when compared to loss of forestland to alternative land uses. Wood's role in delivering present and/or future positive carbon and forest-based ecological values stands in stark contrast to materials that require permanent landscape altering activities like mining for extraction and intense energy input to produce. Forests are one of Oregon's great assets. For this reason, the City of Portland shall create mechanisms to encourage increased wood use (wood that is legally harvested from forestland that has not been converted to a non-forest use) as part of the city’s broader sustainability strategy.</p>	<p>The Guiding Principles are intentionally big-picture. They reflect values, not specific actions/rules and serve as a compass for decision making. Thus, the Guiding Principles as presented align with City action to support sustainable forestry principles.</p>
<p>Change: too many to reasonably follow; cut by 50% and transfer to some other document</p>	<p>These were vetted by internal stakeholders and during that process reduced to 10 (from a larger number). These principles will be communicated/reinforced one at a time during ongoing employee communications to make them more digestible.</p>

Policy Section: Sustainable Procurement Best Practices

Comment/Feedback	Response
Change: federal guidance, using EPA's recommended ecolabels	Did not link policy language to federal guidance due to potential changes to federal resources/guidance over time. Will include references to EPA recommended ecolabels (and other Federal resources) in Program resources for employees.
Change: reference that ecolabels should be ISO Type 1	Program staff feel there are other factors besides ISO to determine reputable ecolabels, and will factor that into Program resources for employees.
Change: for conflict minerals, reference OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.	Added reference to OECD due diligence guidelines
Comment: I like this section because it is a snap shot of now and best practices will grow as we move forward	n/a
Change: Regarding #10, I would strongly urge that "Regional" be changed to "From Oregon", and that Sustainable be defined. FSC certified would be the best way to define it.	Added definition for sustainably sourced wood. Based on internal feedback, removed "regional" from the best practice statement. Also moved this best practice to the "emerging" section, based on internal stakeholder input regarding pilot testing sourcing sustainably sourced wood in order to determine cost impact and feasibility/availability. Origin of wood can also be tracked during pilot to determine feasibility of future best practice update to include the term "regional", "Pacific NW", or "Oregon".
Change: On GHG #10, it is very important to define what exactly sustainably sourced wood means. The current best certification is Forest Stewardship Council (FSC) and the city should use this standard. FSC wood is readily available though not ubiquitous in Oregon. The city implementing this standard would go a long way toward achieving the market influence goals that the city outlines in Section 4.	Added definition for sustainably sourced wood.
Change: GHGs #8 Perhaps through a PPA?	Renewable energy purchases could be through PPA, but also other means. This policy will leave the approach open.

<p>Change: Seems out of place to mention of a specific chemical prohibited for pest control and not mention other specific chemicals targeted (flame retardants, PFASs, metals, etc.)? Encourage consideration recognizing SVHS is on the list.</p>	<p>Removed specific reference to neonicotinoids and will incorporate this reference in Program resources for employees. Do not know <u>SVHS</u> reference.</p>
<p>Change: Consider adding something similar to the following: The City of Portland conducted an analysis of environmental impacts of purchasing and found that GHG emissions (50%) and toxic emissions (24%) contributed to almost 75% of the total environmental impacts. Therefore, these baseline best practices focus on GHG and toxics reduction, 6.3: be aware of upcoming DEQ "attributes" research that may help inform when this guidance on recycled content makes sense and what situations it doesn't make sense (jp), 6.4: not sure what "printing and distribution " is. could not find it googling. need hyperlink and/or different reference, 6.5:I would add language giving preference to re-refined lubricants and anti-freeze. Here or separate, 6.6: same comment as above regarding "attributes" work. This may not be the best policy for some products.. One approach is to just add "When appropriate," to the beginning of the statement (jp), 6.2 toxics: leadership? why not environmental, what about adding water efficiency? Would need to modify my baseline best practices comment to include water (and total of > 75% of environmental impacts)</p>	<p>The reference to the City's 2016 Sustainable Supply Chain Analysis will be mentioned in the Resolution text accompanying the policy update. Also, the Prioritization section was moved to before the Best Practices so as to help explain the best practice categories. DEQ guidance on recycled content can be referenced/ utilized in Program resources for employees. Removed reference to Printing and Distribution in favor of adding the standard as a reference (Printing and Distribution is a City office that conducts in-house printing and paper sourcing). Refined anti-freeze and lubricants are covered by the "buy recycled" best practice and specifics will be included in Program resources for employees. The Policy's continuous maintenance process allows for us to update the best practices as needed as we learn more about when recycled content is appropriate or not in the near future. Water efficiency is covered under the "reduce consumption of natural resources..." and will be highlighted in many Program resources for City employees.</p>

Change: As noted above, we recommend significantly greater specificity regarding the social and economic elements of sustainability, including the following: To Baseline Best Practices, Supplier Diversity and Fair and Safe Supply Chains, add: • Utilize service providers with collective bargaining agreements or labor peace agreements • Utilize service providers whose wages and benefits meet or exceed area standards • Purchase services from employers whose employment policies include just cause and progressive discipline, consistent those the City of Portland maintains with its own employees. [See City of Portland, Human Resources Administrative Rules, Sec. 5.01 Discipline, Due Process Requirements, <https://www.portlandoregon.gov/citycode/article/11983>, and just cause clauses in various “Current City of Portland Labor Agreements,” <https://www.portlandoregon.gov/bhr/27840>] • Comply with Fair Wage Policies (Chapter 3.99) for covered contracted services • Require that all service contractors incorporate the same Baseline Best Practices into any agreement with subcontractors To Emerging Best Practices, Supplier Diversity and Fair and Safe Supply Chains, add: • Request reporting from hot-spot service industries detailing their compliance with/violation of occupational health and safety, wage & hour, and other employment laws. Utilize due diligence to support purchase of services from responsible contractors. We recommend the items above in addition to or combined with the language under item 1 under Emerging Best Practices, Sustainable Procurement/Multi-Purpose – which we support - i.e., “Evaluate and engage contractors on their company and supply chain sustainability practices and performance based on international conventions/declarations and industry best practices, including labor, governance and ethics. Seek continuous improvement.”]

Added language to the “Emerging Best Practices” section to direct the City to expand our definition of responsible offeror (vendor/bidder/proposer). The details of the expansion and associated criteria will be developed post policy adoption.

Added a definition for responsible offeror based on City Code 5.33.

Added language that allows for the Code of Conduct for Apparel Manufacturers (which will be attached to the policy) to be updated via continuous maintenance. This will allow the City to explore the feasibility of expanding the Code to other commodities and what both the content and associated compliance mechanism would look like. The second item under Emerging Best Practices (fair/safe supply chains) directs the Sustainable Procurement Program to do work like this.

<p>Change: Pacific Rivers supports the City of Portland’s goal of purchasing “sustainably sourced wood.” However, to ensure that the City is sourcing wood that is grown and harvested in a manner that conserves biodiversity, stores carbon and is protective of drinking water, aquatic ecosystems and fish and wildlife habitat, we strongly encourage that the City adopt the following language within the policy: “The City of Portland will prioritize obtaining wood sourced in the Pacific Northwest that is either FSC certified, or a comparably rigorous regional standard, recycled, urban salvage or from a treatment designed specifically to restore ecological function and natural condition. SFI certified wood should be precluded from this definition of sustainably sourced wood. SFI certified timber in Oregon follows existing state forest practices law, which is inadequate for conserving the above mentioned ecosystem functions</p>	<p>Added definition for sustainably sourced wood.</p>
<p>Change: Sustainably sourced wood choices Sustainable Northwest supports the sustainably sourced wood call out in the Greenhouse Gases (GHG) Emissions Reduction section. 10. Support the use of regional, sustainably sourced wood products for City owned building and landscape projects. To help the City of Portland meet the goal of purchasing "sustainably sourced wood" the city should adopt the following language directly within the policy or in a connected implementation strategy or definitions appendix: The City of Portland will place a priority on obtaining wood sourced in the Pacific Northwest that is FSC certified, recycled, urban salvage, or from an ecological restoration treatment (a treatment to help return a landscape to a more natural condition).* Justification for the endorsement of FSC (Franklin, et al. 2018, p. 461): “The philosophy, goals, and forest management practices of FSC closely match those of ecological forest management, with the focus in FSC on emulating natural processes and maintaining ecosystem integrity. Among the different certification systems we have reviewed, FSC comes the closest, by a significant margin, to fully reflecting ecological forestry as described in this book.” Literature Cited Franklin, J. F., K. N. Johnson, D. L. Johnson. 2018. Ecological Forest Management. Waveland Press: Long Grove, IL. 650 p. *A good faith effort</p>	<p>Agree that sustainably sourced wood (particularly FSC) has many benefits, not just related to climate change, but will leave the wood reference under GHG Reduction to keep alignment with Climate Action Plan. Program resources for employees can cross-reference additional benefits of sustainably sourced wood. Added definition of "sustainable sourced wood". Based on internal feedback, removed "regional" from the best practice statement. Also moved this best practice to the "emerging" section, based on internal stakeholder input regarding pilot testing sourcing sustainably sourced wood in order to determine cost impact and feasibility/availability. Origin of wood can also be tracked during pilot to determine feasibility of future best practice update to include the term "regional", "Pacific NW", or "Oregon".</p>

<p>shall be made to source wood that meets the above sustainability</p> <p>Change: not applicable for a policy; too much detail; reference only and guide to an appendix if necessary or a separate procedure document that is a companion; NOTE: the subheadings in this section might be helpful in section 4 above</p>	<p>Decided to leave best practices in: 1) as a way to consolidate legacy sustainable-procurement related policies; 2) respond to internal stakeholders that previous version of policy was too vague; 3) Best practices do not get into too much detail, such as which ecolabels to use or what level of percent recycled content is acceptable. For example, the best practices are not detailed enough for a contract specification. Those details will be in the Program resources available to employees. Updating procedure documents that support the implementation of this policy will also be a separate endeavor.</p>
<p>Change: Can you establish goals for addressing human rights and labor rights concerns in supply chains other than apparel? Food? Electronics? Automobiles? Other high risk supply chains?</p>	<p>Added language that allows for the Code of Conduct for Apparel Manufacturers (which will be attached to the policy) to be updated via continuous maintenance. This will allow the City to explore the feasibility of expanding the Code to other commodities and what both the content and associated compliance mechanism would look like. The second item under Emerging Best Practices (fair/safe supply chains) directs the Sustainable Procurement Program to do work like this.</p>

Policy Section: Sustainable Procurement Prioritization

Comment/Feedback	Response
	NOTE: Moved this section to be prior to best practices so as to help explain the best practices categories.
Comment: important to mention even if it is constantly changing	n/a
Comment: Appreciate how to prioritize and that this can change. There has to be a way to say that this prioritization must focus on working in the hierarchy and breaking down the hierarchy to empower everyone's voice/needs	n/a
Change: Briefly explain what spend analysis is (form of economic input-output life cycle assessment, or simply an organizational LCA), or include in the definitions section.	Updated the language to say “Sustainability-related spend analysis”, which is a catch-all phrase used to identify the numerous methods available to analyze different aspects of our supply chain’s environmental, social, and economic performance. We wish to recognize that there is a broader set of methods in use than LCA, such as the supplier diversity spend analysis.
Change: too much detail; reference that there are priorities and direct reader to appendix or elsewhere	Revised to be more concise.

Policy Section: Roles and Responsibilities

Comment/Feedback	Response
Comment: Like the approach of addressing all the different roles, but not sure it is completely necessary	n/a
Comment: my org would want the how--or a statement of how purch works with groups to ensure they know how to do this	The "how" details will be provided through audience-specific Program resources.
Question: Will these be added to staff job descriptions?	For some job descriptions, such as the Sustainable Procurement program staff, these are/will be included in job descriptions. Otherwise, one of the action items in this section under "Bureau Directors" is to include sustainability related requirements into job descriptions.
Comment: These are great!!!!	n/a
<p>Change: The city and bureaus shall do the following to enable monitoring and increased impact. a) Include sustainably sourced wood procurement objectives in contract specifications for all projects that use wood or have the potential to use wood, b) The city shall create educational tools to make contractors aware of sustainable wood sourcing requirements, c) Require contractors to submit receipts for all wood purchased for fulfillment of the contract, d) Require contractors to generate a one page report at the end of the project that provides the dollar value of all wood purchased and value of wood sourced that meets the sustainably sourced wood procurement objectives. e) Identify and implement incentives the city bureaus can use to motivate contractors to achieve conformance with sustainable sourcing policy requirements. f) Require bureaus to summarize and submit annual reports on the total amount of wood purchased by contractors during the year (in dollar amount) and the value of wood sourced that achieved the sustainable wood procurement requirements. g) The city shall put in place procedures, resources, and monitoring tools to ensure the percent of wood purchased from sustainable wood sources increases over time.</p>	Compliance actions for specific commodities will be provided through program resources for staff, including template contract specifications and contractor compliance language as applicable.

Change: too much detail; transfer this to a procedure manual or appendix; summarize the primary call to action for each role and then direct elsewhere for more detail

At this time, there is not "one" procurement procedure manual to incorporate this content. Yet, as our office moves forward with revamping our procurement processes, the idea is to fold in these role-specific tasks as processes change/are updated. In the meantime, Program resources will be developed with the audience in mind knowing that this policy is not the "everyday" document that staff will be utilizing for sustainable procurement information.

Policy Section: Policy Compliance

Comment/Feedback	Response
Change: would be good to see stricter "consequences" for non-compliance	At this time, the program will seek to incentivize internal (Bureau/staff) compliance rather than issue consequences.
Comment: like that if you measure progress, then you shed a light on the current state and be able to make changes	n/a
Change: Can you include that compliance will be shared online as a benchmark?	Added (to reporting section) that annual reports/KPI data will be publicly available.
Comment: One advantage to identifying a specific standard for sustainably sourced wood, is that it makes compliance easier. By clearly identifying the method of compliance (purchasing FSC wood), the city can make it easier for departments to know what they need to do to meet the procurement policy's standards.	Compliance actions for specific commodities will be provided through Program resources for staff.
Comment: seems so late in the document to bring this up; follow your city format; content seems fine	n/a

Policy Section: Sustainable Procurement Metrics and Reporting

Comment/Feedback	Response
Change: consider putting in one set requirement, and then allow for additions. This would set an expectation on data collection and time commitment, as well as planning on the part of bureaus	The sustainable procurement program is currently undertaking a project to review software/tools on the market that may help with establishing appropriate KPIs given policy, stakeholder needs, and program resources. Thus, to move forward with updating the policy, this section is left open to allow for flexibility pending the results of the tools analysis and potential funding. Updates may be made in the near term via the continuous maintenance process.
Comment: like the broad "fair and safe supply chains"	n/a
Change: timetable for developing KPIs	See comment above. Timing for each KPI will depend on results of tools analysis and availability of funding.
Change: share metrics and reporting online	Added.
Comment: These KPIs will be developed outside of the policy? I think stakeholder feedback on the KPI might be valuable too. I think GHG KPIs are very possible to calculate today. Your supply chain report largely does this already.(jp)	See initial comment above regarding tools analysis.

<p>Change: Monitoring and Impact - The city and bureaus shall do the following to enable monitoring and increased impact. a) Include sustainably sourced wood procurement objectives in contract specifications for all projects that use wood or have the potential to use wood, b) The city shall create educational tools to make contractors aware of sustainable wood sourcing requirements, c) Require contractors to submit receipts for all wood purchased for fulfillment of the contract, d) Require contractors to generate a one page report at the end of the project that provides the dollar value of all wood purchased and value of wood sourced that meets the sustainably sourced wood procurement objectives. e) Identify and implement incentives the city bureaus can use to motivate contractors to achieve conformance with sustainable sourcing policy requirements. f) Require bureaus to summarize and submit annual reports on the total amount of wood purchased by contractors during the year (in dollar amount) and the value of wood sourced that achieved the sustainable wood procurement requirements. g) The city shall put in place procedures, resources, and monitoring tools to ensure the percent of wood purchased from sustainable wood sources increases over time.</p>	<p>Compliance actions for specific commodities will be provided through Program resources for staff.</p>
<p>Change: would be nice to at least identify a few key process and impact metrics; something at the dashboard level related to the topline goals that might go to council annually or similar</p>	<p>Identified targeted impact areas in the Prioritization section. Otherwise, see initial comment above regarding tools analysis.</p>

Policy Section: Policy Update and Continuous Maintenance Process

Comment/Feedback	Response
Comment: Like "Proposed updates shall be reviewed by applicable stakeholders for input and refinement"	n/a
Comment: I love that you mentioned continuous maintenance	n/a
Change: Include a requirement for updates/maintenance - at a minimum, policy will be reviewed and updated every X number of years	Received feedback from internal stakeholders to leave timeframe as "periodic".
Change: edit for conciseness; process is fine	Text edited to be a bit more concise.

Policy Section: Definitions

Comment/Feedback	Response
Comment: the conflict minerals section looks good	n/a
Comment: I like the definitions-like the notations/works cited to demonstrate we are in agreement with others on these definitions.	n/a
Change: Define spend analysis (see related comment above under Prioritization).	Did not add to definitions - see response to comment under "Prioritization"
Comment: good	n/a

General/Other Feedback

Comment/Feedback	Response
Comment: would like to see the application of the conflict mineral piece extended to multiple devices and electronics and I am personally willing to assist in any way I can to help the City achieve this	n/a
Change: Resolution 37150 to Section 13? (conflict minerals)	This section is intended to only reference key, "live" related sustainability policies. Per the introduction of this policy draft, the intent of this policy update is to consolidate some policies/resolutions - such as Resolution 37150. Thus, the Resolution associated with this policy update will reference the history of 37150 and then retire 37150 in favor of this policy update.
Change: culturally responsive or specific services? could that fit under social equity...a mention of it is with supplier diversity and fair trade?	Program staff will learn more about best practices around culturally responsible contracting and where it could be prioritized within City contracts. This could then be an addition in a future continuous maintenance update.
Comment: Strong but practical and comprehensive policy update	n/a
Comment: It is unfortunate that wood products are only mentioned in one line of an 11 page document on sustainable procurement. Oregon is the timber capital of the world, wood is an integral component of most any project, and using local FSC certified wood is one of the very best ways to meet most any goal focused on sustainability.	We heard all the wood related comments and will move towards getting pilot projects up and running so we have better answers to internal stakeholder questions regarding FSC availability, sourcing, compliance/tracking, and cost impacts.
Comment: I think this draft does an excellent job of detailing specific roles and responsibilities of those various employees who would be required to follow the policy. Creating separate supplemental documentation for each employee category with specific actions and examples of how to integrate the policy into their daily activities and decisions may also be useful.	There will be supplemental Program resources to aid employees in implementation.

<p>Comment: The Policy does a good job of addressing our concerns such as copper and zinc in building materials. Although the Policy doesn't call out Salmon-Safe anywhere, that would seem consistent with how it treats other certification programs (e.g. LEED). Great work bringing together so many important ideas under one umbrella for the City.</p>	<p>n/a</p>
<p>Comment: This policy strikes the right balance between specificity and flexibility. Great job.</p>	<p>n/a</p>
<p>Thank you for the opportunity to provide input for the City's Sustainable Procurement Policy draft and thank you for calling out sustainable wood sourcing within the current Greenhouse Gases Emissions Reduction section. Sustainable Northwest is writing to:</p> <ol style="list-style-type: none"> 1) Provide language that identifies "sustainably sourced wood" choices to enable monitoring of contractor implementation and progress over time. 2) Suggest the policy be amended to address wood sourcing at a higher and more significant level 3) Suggest monitoring steps. <p>These suggestions are reflected in my comments above. Sustainable Northwest looks forward to working with the city moving forward to ensure the policy is feasible and has maximum impact.</p>	<p>We heard all the wood related comments and will move towards getting pilot projects up and running so we have better answers to internal stakeholder questions regarding FSC availability, sourcing, compliance/tracking, and cost impacts.</p>

<p>I think this is excellent content. There is just so much of it that it isn't a user-friendly document. We highly recommend policy documents that are consolidated (as yours is) and very concise; set the direction about what is expected; the focus sustainability areas; the procurement scope; a few principles; summary of roles. Then we recommend moving all other details into other modular tools and procedure manuals or support documents that are 'plug and play' for various user groups as identified in role section. I have given very low scores in some cases on the charts above because good content is buried in too much detail. The essence of the work and messages are 100% - but user-friendliness and readability are low. Please bear this in mind when considering my feedback. I'm a huge fan of what Portland has done over the years. We want to see you successful as you set new benchmarks with your strategy and policy work.</p>	<p>Agree that this document is not an "everyday" document. It is not intended to be that. Rather the implementation specifics will get dispersed through Procurement processes, Program resources, Program communications, trainings, etc. - all with more concise, digestible, and audience-specific information.</p>
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1. Purpose

In accordance with the City of Portland Sustainable City Principles [1994, 2015] the City of Portland [the City] recognizes that:

1. the products and services the City purchases have inherent social, human health, environmental and economic impacts;
2. the human health, environmental, social and economic impacts of products and services occur throughout their [life cycle](#) and throughout the associated supply chains;
3. the City can leverage its purchasing to reduce adverse impacts throughout product or service life cycles and influence positive change within markets and communities; and
4. by understanding and taking responsibility for the full, life cycle impacts and costs of goods and services associated with City purchases, the City reduces risk, practices fiscal responsibility, reduces adverse social and environmental impacts, and contributes to sustainable development in general.

As such, the City is committed to understanding and taking appropriate responsibility for the impacts of its purchasing by:

1. establishing this [Sustainable Procurement](#) Policy to guide purchasing decisions at the City;
2. integrating [sustainable procurement best practices](#) established by this Sustainable Procurement Policy and subsequent sustainable procurement resources into the City's procurement processes and decision making; and
3. maintaining a Sustainable Procurement Program adequate to support City purchasing decisions and to facilitate stakeholder collaboration, compliance, and continuous improvement.

2. Applicability

This policy applies to all types of City-funded procurements and to all City divisions and employees. Specific employee roles, responsibilities, and expectations are further described within this policy.

3. Policy Statement

All City employees shall utilize the City's [sustainable procurement guiding principles](#) and follow [sustainable procurement best practices](#) when planning and designing projects, developing project and operations budgets, developing asset management plans, writing product and service specifications or standards, selecting materials, making purchasing or supplier decisions, and developing and managing City contracts and price agreements as applicable to their [roles and responsibilities](#) and/or to a specific project. In doing so, City employees shall strive to be leaders in sustainable procurement and reduce adverse social, human health, and environmental impacts associated with City purchases while maintaining fiscal health, both in the short and long-term.

4. Sustainable Procurement Guiding Principles

1. [Everything is Connected](#). All life depends on healthy natural systems. Humanity depends on vibrant and fair social systems. Our purchasing decisions impact these systems on all levels.
2. [Conserve](#). Reuse first. Buy only what we need second. Acknowledge real limits of natural resources.
3. [Think in 3D](#). Consider all 3 dimensions—environmental, social, economic—when evaluating options. Look for hidden costs to people and planet not included in price.
4. [Take a Life Cycle Perspective](#). All purchases have impacts over the life of the product or service. Think about long-term costs to people, planet, and the City.
5. [Provide Fair Opportunities](#). Ensure suppliers have a full and fair chance to compete. Promote transparency in decision making and actively mitigate bias.
6. [Ensure Health and Safety](#). Take precautions. Avoid toxins that recirculate in air, water, soils and materials to harm people and animals.

7. Uphold Accountability. Reinforce responsibility and [ethical behavior](#) throughout our supply chain, upstream and downstream.
8. Support Innovation. Increase demand and build market capacity for sustainable solutions. Change the status quo for the better.
9. Full Integration. Utilize [3D](#) thinking in all planning, purchasing, and contract management practices. Respect interests of all stakeholders.
10. Lead the Way. Seek continuous improvement and collaborate with other agencies to make a positive difference. Together, many small actions add up to big change.

5. Sustainable Procurement Prioritization

Based on sustainability-related spend analyses and City sustainability policy synergies, the City shall target sustainable procurement practices that:

1. Reduce greenhouse gases (GHGs);
2. Prevent or otherwise reduce exposures to [Substances of \(Very\) High Concern](#) (SVHCs, SHCs);
3. Foster and integrate supplier diversity; and/or
4. Support safe and fair labor practices and ethical behavior throughout the supply chain.

The Sustainable Procurement Program shall develop a sustainable procurement prioritization toolkit or similar guidance for City employees to help maximize fiscally responsible “high value, high impact” actions based on the above targeted impact areas and operational contexts.

This section may be updated in between policy revisions per the [continuous maintenance process](#).

6. Sustainable Procurement Best Practices

The following sustainable procurement [baseline](#) and [emerging](#) best practices are procurement practices derived from historical City sustainability policies and/or reputable sustainable procurement research and guidance. These best practices may be updated in between policy revisions per the [continuous maintenance process](#). Implementation tools and specific guidance for these best practices shall be provided through the Sustainable Procurement Program.

Baseline Best Practices

Baseline best practices represent sustainable procurement processes, decisions, methodologies, or actions that should be incorporated into City purchasing activities by default (“how we do business”).

Greenhouse Gases (GHG) Emissions Reduction

1. Invest in energy efficient products, services and technologies that result in simple paybacks of ten years or less.
2. Specify and buy recycled content products with as high post-consumer waste content as possible while meeting responsible performance specifications; including packaging and shipping materials. Key materials to target for recycled content include paper, plastics, metals, asphalt, and concrete.
3. Specify and buy paper products that meet the City’s [environmentally responsible paper standard](#).
4. Invest in highly fuel-efficient and [low carbon fueled](#) fleet vehicles and equipment, following an “electric first” strategy. Include installation of electric charging stations where appropriate. Bureaus are responsible for metering electricity fuel use for tracking purposes.
5. Specify and buy reusable, refillable, and readily recyclable products, including packaging and shipping materials. Invest in processes, technologies, products, or services that reduce waste.
6. Invest in on-site renewable energy technologies at applicable City-owned facilities as defined by the City’s Green Building Policy.
7. Purchase renewable energy for City electricity use.
8. Ensure architectural, engineering, and related design services deliverables incorporate City green building and green infrastructure policies and practices.
9. Invest in processes, technologies, products, or services that reduce consumption of natural resources or chemicals.
10. Avoid the use of aerosol cleaning products and canned air products.

11. Avoid the use of bottled water; support access to bottle-fill tap water stations.

Harmful Chemicals Reduction

1. Seek out and utilize processes, technologies, services and products that reduce exposure of Substances of (Very) High Concern ([SVHCs/SHCs](#)) to people and the environment. Follow the [Precautionary Principle](#) when evaluating the comparative toxicity of processes, products, or services.
2. Specify and utilize interior finishes (paints, flooring, furniture, etc.) that meet third-party leadership standards for less-toxic and low-emitting products.
3. Specify and utilize interior cleaning and maintenance products that meet third-party leadership standards for less-toxic and low-emitting products, including products used by contractors who clean and maintain City facilities. Specify and utilize least-toxic disinfectants and use disinfectants judiciously.
4. Specify and utilize electronics products that meet third-party leadership standards that include mandates for reducing/eliminating [SVHCs/SHCs](#). Specify and utilize electronic recyclers that meet third-party leadership standards for responsible electronics recycling.
5. Use effective and progressive integrated pest management strategies to minimize reliance on pesticides of concern and to ensure careful screening of products, their use, and potential impacts.
6. Do not use exterior materials containing zinc, copper, arsenic, or other materials that can contaminate stormwater and are toxic to aquatic life.
7. Utilize vegetable-based oil, food-grade oil or other environmentally comparable vehicle/equipment oil products, where available, and biodegradable hydraulic fluids.

Supplier Diversity and Fair and Safe Supply Chains

1. Seek out and utilize State certified [DMWESB](#) and [SDVB](#) contractors.
2. Purchase apparel products from manufacturers that comply with the City's Code of Conduct for Apparel Manufacturers and disclose the apparel product's point-of-assembly factory locations.

Sustainable Procurement Tools/Multi-Purpose

1. Specify and select products and services independently certified to reputable third-party environmental and/or social product and/or service standards, preferably multi-attribute standards that evaluate products or services along their entire life cycle.
2. Whenever possible, utilize [life cycle costing](#) methods to determine the full cost of a product, service or design.
3. Utilize strategic procurement methodologies to obtain the best value while advancing sustainable procurement. Applicable strategic procurement methodologies include, but are not limited to: spend consolidation (focusing solicitations only on sustainable procurement products/services); aggregation (leveraging collective purchasing power); standardization (reducing product variety); [servicizing](#); or negotiating for innovation (supplier engagement).

Emerging Best Practices

Emerging best practices represent practices that are desirable for the City to engage in and develop, but to due to nascent data, technologies, standards, or processes require pilot testing and/or a longer timeframe for widespread implementation.

GHG Emissions Reduction

1. Request life cycle product environmental impact data through Environmental Product Declarations (EPDs). Use EPD data among like products to identify and select options with lower life cycle impacts. Key materials to target for product-specific EPDs include concrete and other GHG or water intensive products.
2. Specify and utilize [sustainably sourced wood](#) for City-owned building and landscape projects, beginning with a pilot project approach.
3. Specify low-carbon professional and technology services.
4. Specify fuel-efficient and low-carbon transportation, distribution and delivery services.
5. Foster [circular economy](#) models for products by supporting manufacturer take-back, leasing, and similar practices.

Harmful Chemicals Reduction

1. Request product ingredient and hazard screening assessment disclosure from manufacturers. Use screenings to identify and select products and substances that do not contain or generate [SVHCs/SHCs](#), asthmagens, or respiratory irritants throughout their life cycle.
2. Ensure architectural, engineering, and related design services incorporate material screening and selection requirements that reduce the use of products/materials containing/generating [SVHCs/SHCs](#), asthmagens, or respiratory irritants throughout their lifecycle.
3. When utilizing plastic-containing products, seek plastics that involve the fewest [SVHCs/SHCs](#) during the manufacturing process and within the final product.

Supplier Diversity and Fair and Safe Supply Chains

1. Request [conflict minerals](#) reporting from applicable electronics manufacturers detailing their due diligence activities to source conflict-free 3TG following the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Utilize due diligence information to support the development and purchase of conflict-free products.
2. Evaluate and engage contractors on their company and supply chain sustainability practices and performance based on international conventions/declarations and industry best practices, including labor, governance and ethics. Seek continuous improvement.
3. Expand [responsible offeror](#) criteria to include requirements that demonstrate vendor integrity related to environmental, health and safety, labor, governance and ethical business practices.

7. Roles and Responsibilities

Policy outcomes depend upon collaborative action. City employees determine sustainable procurement success as they carry out their roles at/with the City. The following outlines expectations and how different roles contribute to sustainable procurement at the City.

All City Employees

Within your scope of work:

- When analyzing the need for specific goods or services, consider what alternative options might exist to deliver the same outcome in a better way, utilizing the [sustainable procurement guiding principles](#) and related tools.
- Select goods and services following [sustainable procurement best practices](#) and resources.
- Reference and utilize Sustainable Procurement Program tools and resources.
- Contribute to sustainable procurement targeted data collection and reporting, as requested.
- Seek opportunities for sustainable procurement training.

Elected Officials and City Budget Director

- Incorporate sustainability assessments into the budget review process to support and advance Sustainable City Principles, City Environmental Performance Objectives, sustainable procurement, and related core sustainability policies.

Chief Procurement Officer

- Maintain a Sustainable Procurement Program with dedicated staff and resources.
- Ensure Sustainable Procurement Program viability through adequate staffing, funding, and resource allocation to fulfill the Sustainable Procurement Policy, program expectations, and continuous improvement.
- Seek opportunities for sustainable procurement to align with and complement other City programs and initiatives.
- Seek opportunities to foster and support inter-bureau collaboration that facilitates sustainable procurement practices.
- Advocate for and integrate [sustainable procurement guiding principles](#), [best practices](#) and policy mandates in City procurement processes and initiatives.

- Include sustainable procurement and related sustainability policies in employee trainings; support employee continuing education related to sustainability.
- Integrate sustainability into Procurement teams' objectives and job descriptions.
- Support the sustainable procurement community of practice through professional associations and networking.

Sustainable Procurement Program Staff

- Provide sustainable procurement subject matter expertise to City employees.
- Conduct sustainable procurement related research and maintain knowledge of current best practices.
- Develop and maintain sustainable procurement processes, tools and resources for City employees and applicable external stakeholders.
- Collaborate with internal stakeholders to ensure key price agreements and contracts incorporate [sustainable procurement best practices](#) and City sustainability policy mandates.
- Develop and maintain sustainable procurement communications with internal and external stakeholders.
- Provide sustainable procurement education and training for City employees and applicable external stakeholders.
- Facilitate strategic sustainable procurement pilot tests and implementation initiatives.
- Facilitate sustainable procurement collaboration among City bureaus.
- Participate in Citywide sustainability committees and/or initiatives aligned with the Sustainable Procurement Program.
- Report on Sustainable Procurement Program activities and performance.
- Oversee sustainable procurement contractor compliance, as applicable and within Program capabilities.
- Develop and maintain Sustainable Procurement Program administrative resources.
- Contribute to the regional, national, and international sustainable procurement community of practice.

Bureau Directors

- Support utilization of the [sustainable procurement guiding principles](#) during project planning, contract/purchase decisions, and standards/specifications development.
- Include [sustainable procurement best practices](#) and policy mandates in project, program, and operations expectations.
- Integrate sustainability into bureau teams' objectives and job descriptions.
- Ensure project, program, and operations budgets enable City [sustainable procurement best practices](#) and policy mandates.
- Support and encourage employee initiatives related to sustainability and innovation.
- Support sustainable procurement targeted data collection and reporting.
- Support inter-bureau collaboration and coordination that facilitates sustainable procurement and related process efficiencies.
- Include sustainable procurement and related sustainability policies in employee trainings; support employee continuing education related to sustainability.
- Support staff time contributing to sustainable procurement initiatives and pilot projects.

Procurement Services and Bureau Procurement Staff

- Review solicitations and procurements for [sustainable procurement best practices](#).
- Initiate conversations and work with Bureau staff to incorporate [sustainable procurement best practices](#) and related City sustainability mandates into solicitations, contracts, and price agreements.
- Collaborate with Sustainable Procurement Program staff, including coordinating education of bureau contacts and contractors on sustainable procurement practices and assisting with data collection, compliance and monitoring.
- Reference and utilize Sustainable Procurement Program tools and resources.
- Seek opportunities for sustainable procurement training.

- Support the sustainable procurement community of practice through professional associations and networking.

City Planners, Policy, Program and Operations Managers

Within your scope of work:

- Utilize the [sustainable procurement guiding principles](#) and [best practices](#) during planning, policy, standards, and process development.
- Seek opportunities for and implement inter-bureau collaboration that advance City sustainability and sustainable procurement principles.
- As opportunities arise, update and realign policies, processes, or practices to advance City sustainability and sustainable procurement principles.
- Plan and advocate for budgets that support City [sustainable procurement best practices](#) and policy mandates.
- Include sustainable procurement and related sustainability policies in employee trainings; support employee continuing education related to sustainability.
- Support/Facilitate contractor sustainability education and practices.
- Support staff time contributing to sustainable procurement initiatives and pilot projects.

City Project Managers and Design Professionals (e.g. Architects, Engineers, Landscape Architects)

Within your scope of work:

- Utilize the [sustainable procurement guiding principles](#) and [best practices](#) during project planning and development and when revising standard drawings, details and specifications.
- When analyzing the need for specific goods or services, consider what alternative options might exist to deliver the same outcome in a better way, utilizing the [sustainable procurement guiding principles](#) and related tools.
- Incorporate [sustainable procurement best practices](#) and [prioritization strategies](#) into project design, contractor and material/product specifications and selection.
- Reference and utilize Sustainable Procurement Program tools and resources.
- Plan and advocate for project budgets that support City [sustainable procurement best practices](#) and related sustainability mandates.
- Engage project contractors, consultants, suppliers, volunteers, or other City staff on [sustainable procurement guiding principles](#) and [best practices](#).
- Contribute to sustainable procurement targeted data collection and reporting, as requested.
- Seek opportunities for sustainable procurement and profession-specific sustainability training.

9. Policy Compliance

City employees are responsible for complying with this policy, utilizing applicable Sustainable Procurement Program tools and resources, and providing targeted sustainable procurement data as requested.

As outlined in the [Sustainable Procurement Metrics and Reporting](#) section, the Sustainable Procurement Program shall track [Key Performance Indicator](#) (KPI) data at the bureau level to the extent possible to facilitate feedback to bureaus on sustainable procurement performance. The Sustainable Procurement Program shall also develop other feedback loops for bureaus to convey effectiveness of sustainable procurement specifications, processes, and program resources. The Sustainable Procurement Program shall seek opportunities to incentivize compliance with this policy through recognition, process improvements, or other strategic methods.

10. Sustainable Procurement Metrics and Reporting

The following metrics and reporting requirements shall encourage continuous improvement and may be updated in between policy revisions per the [continuous maintenance process](#).

For each of the [targeted impact areas](#), the Sustainable Procurement Program shall develop at least one [Key Performance Indicator](#) (KPI). As sustainable procurement data capabilities and sustainable procurement resources advance, the Sustainable Procurement Program shall develop additional KPIs.

To the extent possible, the Sustainable Procurement Program shall develop and track KPI data at the bureau level to facilitate feedback to bureaus on sustainable procurement performance.

To facilitate continuous improvement and process efficiencies, the City shall invest in sustainable procurement spend and impact data, life cycle costing, cost-benefit, and/or supplier evaluation tracking and reporting tools as best practices in sustainable procurement metrics and data capabilities develop.

The Sustainable Procurement Program shall report annually on the prioritized impact area KPIs and seek to increase reporting frequency and data access as applicable tools become available. Annual reports/KPI data shall be posted on the Sustainable Procurement Program website.

11. Policy Update and Continuous Maintenance Process

Policy Update Process

The Chief Procurement Officer and Sustainable Procurement Program staff shall periodically bring together stakeholders to review and update this policy.

Continuous Maintenance Process

Sections of this policy subject to continuous maintenance may be revised in between policy update cycles in order to incorporate new applicable initiatives, best practices, tools, capabilities and processes, and remove outdated references. Updates made to this policy through continuous maintenance will be posted on the Sustainable Procurement Program website and reference the month and year the update was made. The continuous maintenance process shall be initiated by the Sustainable Procurement Program Manager. Proposed updates shall be reviewed by applicable stakeholders for input and refinement. Proposed updates shall be approved by an internal multi-bureau stakeholder group, such as the Procurement Services Bureau Liaison Group or equivalent. Continuous maintenance updates shall occur no more frequently than once a year.

12. Definitions

The following definitions establish the meaning of key terms contained in this policy document and may be updated in between policy revisions per the [continuous maintenance process](#).

3D: three dimensions. In the context of this policy and the [Sustainable Procurement Guiding Principles](#), 3D refers to the three dimensions of sustainability: environmental, social, and economic.

Certified DMWESB: Disadvantaged, Minority, Women, or Emerging Small Business as certified by the State of Oregon Certification Office for Business Inclusion and Diversity (COBID).

Certified SDVB: Service Disabled Veteran Business as certified by the State of Oregon Certification Office for Business Inclusion and Diversity (COBID).

Circular Economy: Economy that is restorative and regenerative by design, and which aims to keep products, components and materials at their highest utility and value at all times, distinguishing between technical and biological cycles.¹

Conflict Minerals: Natural resources extracted in a conflict zone and sold to finance the fighting. Conflict minerals include the metals tantalum, tin, tungsten and gold (3TG), which are the derivatives of the minerals cassiterite, columbite-tantalite and wolframite, respectively.

Ethical Behavior: Behavior that involves demonstrating respect for key moral principles including honesty, fairness, equity, diversity, and human rights.

Greenhouse Gases (GHGs): The atmospheric gases responsible for causing global warming and climate change. The major GHGs are carbon dioxide (CO₂), methane (CH₄) and nitrous oxide (N₂O). Less prevalent --but very powerful -- greenhouse gases are hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulphur hexafluoride (SF₆).

Indicator: Measurable representation of the condition or status of operations, management or conditions.¹

Key Performance Indicator (KPI): demonstrates how effectively an organization is achieving success according to objectives; helps evaluate various functions and processes important to achieving goals.

Life Cycle: Consecutive and interlinked stages of a goods or services system, from “cradle to grave”, e.g. from resource generation and raw material acquisition through production, use, and final disposal.

Life Cycle Costing (LCC): Method for calculating the costs of goods or services throughout their [life cycle](#).¹ It includes total cost of ownership (TCO) and positive or negative externalities which can be monetized, both to the City and to society.

Low Carbon Fuel: Transportation fuels with a lower carbon intensity (grams CO₂-equivalent per megajoule of fuel) as compared to conventional petroleum fuels such as gasoline and diesel. The most common low-carbon fuels are alternative fuels such as biodiesel, ethanol, and renewable diesel that can be used directly or blended with conventional petroleum fuels. Electricity, natural gas, and propane can also be considered low carbon fuels.

Precautionary Principle: A decision-making paradigm that promotes taking precautionary measures when an activity raises threats of serious or irreversible harm, even if some of the cause-and-effect relationships are not fully established.

Responsible Offeror, Bidder, Proposer: A Person who has submitted an offer, bid or proposal and who meets the standards set forth in City Code sections 5.33.500 or 5.34.500, as applicable, and who has not been debarred, disqualified, or who has not failed to prequalify when prequalification is required by the solicitation document.

Servicizing: Business practice where value is provided through a combination of product and service and where customer needs are satisfied by selling the function of the product rather than product itself and/or by increasing the service component of the offer. Pay-per-copy equipment leasing and car sharing services are common servicizing examples.

Substances of (Very) High Concern (SVHC, SHC): Substances that may have serious and often irreversible effects on human health and the environment. SVHC/SHCs are typically defined as those that have one or more of the following attributes:

- Persistent, Bioaccumulative and Toxic (PBT),
- very Persistent and very Bioaccumulative (vPvB),
- very Persistent and Toxic (vPT),
- very Bioaccumulative and Toxic (vBT), or
- known or likely to be:
 - carcinogenic,
 - mutagenic,
 - reproductive or developmental toxicant,
 - neurotoxicant or
 - endocrine disrupting.

Supplier Diversity: a proactive business program which encourages the use of minority-owned, women owned, veteran owned, LGBTQ-owned, service disabled veteran owned, historically underutilized business, and Small Business Administration (SBA)-defined small business concerns as suppliers.

Sustainability: State of the global system, including environmental, social and economic aspects, in which the needs of the present are met without compromising the ability of future generation to meet their own needs. The environmental, social, and economic aspects interact, are interdependent and are often referred to as the three dimensions of sustainability.¹

Sustainability Aspect: Aspect of a product or service or activity occurring within its [life cycle](#) that is responsible for positive or negative sustainability impacts. For example, air pollution from burning fossil fuels can occur throughout a product or service life cycle and negatively impact the health of workers and community residents (e.g. workers at production sites, residents near freight corridors or production sites, etc.).

Sustainable Procurement: Procurement that has the greatest positive environmental, social and economic impacts possible over the entire life cycle. Sustainable procurement involves the [sustainability aspects](#) related to the goods, services, and suppliers along the supply chains. Sustainable procurement contributes to the achievement of organizational [sustainability](#) objectives and to overall sustainable development.¹

Sustainably Sourced Wood: Wood that is Forest Stewardship Council (FSC) certified, recycled, salvage, or from an ecological restoration forestry project. Ecological restoration forestry refers to management activities that contribute to the recovery of ecosystems that have been degraded, damaged, or destroyed. Some examples of ecological restoration in forests are:

- Harvesting small patches of trees to create compositional and special heterogeneity in uniform, single species plantations that developed after harvest of old-growth forests.
- Thinning forests that have become overgrown because of fire suppression.

13. Related Sustainability Policies and Resolutions

- Resolution 37121: [2015 Sustainable City Government Principles and 2030 Environmental Performance Objectives](#)
- Resolution 37135: [2015 Climate Action Plan](#)
- Resolution 37122: [2015 Green Building Policy](#)

14. Attachments

1. [Code of Conduct for Apparel Manufacturers](#)
2. Environmentally Responsible Paper Standard

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Attachment 1: Code of Conduct for Apparel Manufacturers

The following Code of Conduct for Apparel Manufacturers may be updated in between policy revisions per the [continuous maintenance process](#).

This Code of Conduct specifies minimum standards and is based on the principle that contractors, subcontractors and suppliers within the supply chain of the prime contractor, including cut and sew manufacturers, comply with all applicable laws and regulations in their business activities. Labor practices are based upon the core conventions of the International Labor Conventions (ILO), the United Nations' Universal Declaration of Human Rights and the United Nations conventions on the rights of the child and the elimination of all forms of discrimination against women.

1. Labor Standards

a. Freedom of Association and Right to Collective Bargaining

Contractors and their subcontractors will recognize and respect that workers, without distinction, have the right to join and form trade unions of their own choosing and to bargain collectively, and will remain strictly neutral on the matter of workers' choice to unionize or not unionize. Workers shall not be subjected to harassment, intimidation, or retaliation as a result of his or her efforts to freely associate or bargain collectively. Contractors and their subcontractors shall not initiate, dominate or support organizations in which workers participate or are represented. Contractors and their subcontractors will negotiate in good faith with any union or other representative worker body duly constituted by the workers. Where the right of freedom of association and collective bargaining is restricted under law, the supplier will not hinder the development of parallel means for independent, free association and bargaining.

b. Freely Chosen Employment

Employment must be on a voluntary basis, respecting the rights of employees to decide to work or not. Contractors and their subcontractors will not use forced, illegal, or prison labor, including indentured labor or any other form of compulsory labor. Contractors and their subcontractors will not require workers to lodge deposits or their identity papers as a condition employment, or financially penalize workers for resigning.

c. Child Labor Avoidance

Contractors and their subcontractors will not employ any person that is under the age of 15, under the age interfering with compulsory schooling, or under the minimum age established by law.

Contractors and their subcontractors acknowledge that according to the UN Convention on the Rights of the Child, a person is a child until age of 18. Contractors and their subcontractors will ensure young workers in the age group 15-17 are employed according to the protective restrictions prescribed by the law of the jurisdiction of the manufacturing facility.

d. Humane Treatment & Disciplinary Practices

Employees shall be treated with respect. Corporal punishment and other forms of coercion, abuse or harassment, whether psychological, verbal, sexual or physical, is prohibited.

e. Non-Discrimination

No worker shall be subject to any discrimination in employment, including hiring, salary, benefits, advancement, discipline, termination or retirement, on the basis of race, nationality, age, religion, disability, gender, pregnancy, maternity leave status, sexual orientation, union affiliation, marital status, political opinion, or social or ethnic origin.

No contractor or subcontractor shall require or compel any worker to use contraceptives or take pregnancy tests.

f. Regular Hours of Work

Workers shall not be required to work a regular work week of more than the lesser of 48 hours per week or the limits on regular hours allowed by the law of the country of manufacture and will be provided with at least one day off during every seven-day period, unless the point of assembly facility in which the labor is performed is party to a collective bargaining agreement that permits mandatory overtime, and any mandatory overtime hours are worked in conformance with a collective bargaining agreement.

g. Overtime

Workers shall be compensated for overtime hours, such as a premium rate, when legally required in the country of manufacture or point of assembly or, in those locations where such laws do not exist, at a rate of at least one-and-one-half their regular hourly compensation.

h. Wages and Benefits for Regular Hours of Work

The point of assembly facilities shall pay wages that meet the higher standard of (a) the legal minimum wage; (b) the prevailing wage in the industry in the country of production; or (c) a non-poverty wage as defined as follows. "Non-poverty wage" in the U.S. is the level of wages required for a full-time worker to produce an annual income equal to or greater than the United State Department of Health and Human Services' most recent poverty wage is a comparable nationwide wage and benefit level, adjusted to reflect the local cost of living.

Workers must be paid directly and provided with clear, written accounting of hours worked, deductions and regular and overtime wages. Deductions from wages not provided for by the laws of the countries where goods are made, shall not be permitted without the express permission of the employee. Point of assembly facilities shall also maintain verifiable wages and hour records for each employee that contain the following: (a) name and job classification; (b) a general description of the work the worker performed each day and the rate of pay (including rates of contributions for, or costs assumed to provide fringe benefits); (c) the daily and weekly number of hours worked; (d) deductions made; and (e) actual wages paid.

i. Just Cause Termination

Point of assembly facilities shall not engage in any reprisal, coercion, intimidation or take any other adverse action against workers for filing complaints, giving evidence, or otherwise cooperating with monitoring, enforcement, remediation or other activity by the City of Portland or any other entity authorized by the City of Portland to monitor or enforce obligations under this Code.

Point of assembly facilities shall not terminate workers without just cause. Contractors shall provide for a mediation or grievance process to resolve workplace disputes. For production in the United States such disputes are limited to those not regulated by the National Labor Relations Board.

2. Health and Safety

a. Management of Health and Safety

Workers will be provided with a safe and healthy work environment. Conditions in all work and residential facilities shall be safe, clean, and consistent with all applicable laws and regulations regarding health and safety. The contractors and their subcontractors shall provide written health and safety guidelines for employees in terms of equipment, training, management, and work practices in the local language(s) of the employees.

3. Cut and Run

Contractors, subcontractors including point of assembly facilities shall not shut down or reduce orders to a point of assembly facility in order to deny workers any right or standard protected by this code, or to otherwise avoid complying with this code, including their right to freely associate.

Attachment 2: Environmentally Responsible Paper Standard

The following paper requirements may be updated in between policy revisions per the [continuous maintenance process](#).

Paper Selection Guiding Principles

1. **Minimize paper use.** In addition to reducing paper consumption, choose paper stock and design layouts that minimize paper waste.
2. **Recycled content paper fiber, especially post-consumer (PCW), is best.**
3. **Agricultural residue sources for paper fiber are also good, and can complement tree fiber recycled content.** Agricultural residues do not include purpose crops grown for fiber. They include agricultural residues that would likely otherwise be burned, such as wheat straw, rice straw, seed flax straw, corn stalks, sorghum stalks, cotton stalks, cotton linters, sugar cane bagasse, and rye seek grass straw.
4. **Ideally, any virgin tree fiber should be Forest Stewardship Council (FSC) certified.**
5. **Ideally, paper should be bleached using Processed Chlorine Free (PCF) and Totally Chlorine Free Bleaching Processes (TCF).**

Paper products utilized by the City shall meet Paper Profile 1 unless compliant paper is not available for the specific application; in such cases, the paper product shall meet Paper Profile 2. The term “paper product” refers to all consumer paper products, including but not limited to: copy, printing, and writing papers, newsprint, commercial sanitary tissue products, paperboard and packaging products, and other specialty consumer paper goods.

Paper Profile 1: Superior

Paper meets the following:

1. PCF or TCF bleaching process; AND
2. Fiber made up of the following:
 - a. 100% PCW; or
 - b. 100% Agricultural residue; or
 - c. 100% PCW and agricultural residue Mix; or
 - d. 50%-99% PCW and/or agricultural residue plus 1%-50% FSC certified virgin tree fiber

Paper Profile 2: Acceptable until Superior is Available

1. PCF or TCF or Enhanced Elemental Chlorine Free (EECF) or Elemental Chlorine Free (ECF) bleaching process (in order of preference); AND
2. Fiber made up of the following:
 - a. 30% PCW minimum; or
 - b. 30% agricultural residue minimum

To stimulate continuous improvement towards Superior papers, give preference within the “Acceptable” category to papers that:

- Meet the “Superior” fiber mix, but maybe haven’t achieved PCF or TCF bleaching processes yet.
- Utilize FSC certified virgin tree fiber for the non-PCW or non-agricultural residue fiber.