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**Department of Works and Engineering**

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**Request for Information - ADDENDUM No. 2**

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**DATE: 05/09/25**

**METHOD OF DELIVERY: WEBPAGE**

**PROJECT NAME & NO.: Battery Shredding Products and Services RFI - BSPS01**

**RE: Question & Answers**

**TO: Proponents**

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*The following information supplements and/or supersedes the RFI documents dated July 25<sup>th</sup> 2025*

*This RFI Addendum forms part of the contract documents and is to be read, interpreted and coordinated with all other parts. The following revisions supersede the information contained in the original documentation issued for the above-named project to the extent referenced and shall become part thereof.*

**Questions**

- Q1.** Would exporting other types of hazardous waste be acceptable in the scope of this RFI?  
**Q2.** What respective legislation does Bermuda use to classify its exported waste vs. its exported products?  
**Q3.** Does this legislation classify black mass as a product (non-hazardous) or a waste (hazardous)?

**Answers**

*We are thankful for the interest expressed in the Government of Bermuda's RFI for **Battery Shredding Products and Services (BSPS01)**. We have received queries seeking (i) clarification of hazardous specifications and (ii) confirmation that **alternative technical solutions** to shredding may be submitted.*

**Intent and scope:**

*As stated in the RFI, the Government is seeking information to support the design and procurement of small-scale EV battery pre-processing capability in Bermuda, with a long-term capacity target of up to 500 metric tons per year of end-of-life (EOL) EV batteries. The goal is to neutralize safety and fire risks to enable cost-effective maritime shipment to the United States for materials recovery.*

*Therefore, respondents may propose **any technological pathway**— and are not limited to shredding approaches i.e. other pre-processing methods involving mechanical, electrochemical, thermal, inerting/immersion, or—that can:*

- **Effectively neutralize** the EV battery (pack/module/cell) to mitigate safety and thermal-runaway risks for storage and maritime transport;
- Produce a **processed output** suitable for **shipping, export and acceptance at U.S. ports of entry**; and
- Demonstrate **compliance** with applicable U.S. and international transport requirements governing electronic waste.

*These proposals are welcome alongside traditional shredding solutions; the RFI intent is to gather a broad range of approaches that meet Bermuda's safety and logistics needs.*

**Regulatory considerations**

*The transboundary movement of processed EV battery output must comply with the Basel Convention as well as the regulations of relevant U.S. agencies, including US Environmental Protection Agency (EPA), US Coast Guard, and the Pipeline and Hazardous Materials Safety Administration (PHMSA). At present, Bermuda does not have specific legislation*

*governing the classification of EV battery waste or processed battery outputs.*

*Queries received indicate that certain fractions of processed output (e.g., copper or other materials contained in processed battery output) may exhibit characteristics of hazardous waste. Respondents are therefore encouraged to provide:*

- Identification of any output fractions that may be hazardous,*
- The nature of the hazard (e.g., flammability, corrosivity, reactivity, toxicity), and*
- How these hazards are classified, packaged, stored, and transported under applicable international conventions and U.S. shipping and storage regulations.*

***Directions on what to include in submissions:***

*To expedite evaluation of submissions, please include the following, as applicable to your solution and shipping configuration:*

- 1. **Technical description** of the neutralization/pre-processing method, operating conditions, and safety controls; expected handling needs; and the form of the processed output (e.g., modules immobilized/inerted, drained/de-energized cells, shredded fractions, black mass, etc.).*
- 2. **Waste classification:** Analytical results and/or rationale showing whether the output is non-hazardous under US EPA criteria and Basel protocols; include any standard used.*
- 3. **Transport packaging & mode:** Please mention any UN identification / packing instructions, special provisions, and stowage/segregation applicable to the proposed output during storage and maritime shipping until reaching final recovery facility. If available, please include reference of shipping companies who have transported processed output.*
- 4. **Acceptance at US port of entry:** If available, include instance of maritime transport to US.*

*To ensure fairness and consistency, **the Government will not engage in individual conversations prior to the RFI submission deadline.** The Government **may engage after the deadline** to seek clarification or better understand submissions.*

*We appreciate your cooperation and look forward to receiving comprehensive responses that address safety neutralization, compliant maritime transport, and acceptance at US ports—enabling Bermuda to move EOL EV batteries to downstream recyclers in US for critical mineral recovery.*