

From: [REDACTED]
To: [DECC GPP](#)
Subject: Feedback in relation to - Draft Green Public Procurement Strategy and Action Plan 2023-2027
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[Draft Green Public Procurement Strategy and Action Feedback Notes 171123.docx](#)

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Hi,

Please see attached some feedback in relation to the Draft Green Public Procurement Strategy and Action Plan 2023-2027.

Kind Regards,

[REDACTED]



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Draft Green Public Procurement Strategy and Action Plan Public Consultation Questions

Template for Responses

Q1 Do you think the approach as detailed in the draft Green Public Procurement Strategy and Action Plan will significantly increase Green Public Procurement across the Public Sector?

Response:

- Currently, where a subject area does not fall under any of the areas covered in this guidance, it is unclear as to where to go next in terms of usable information to include in tenders. The proposed decision tree diagram (Figure 1 – GPP Implementation Mandate page 30) should be helpful in this regard along with the Appendix III – Minimum Environmental Criteria for Public Procurement of Goods and Services guidance. This also links in to Part 6 on GPP implementation which expands on the steps and principles further.
- We note the importance of training (and the use of the various tools) and also development and resources to give people the knowledge required to assess where GPP should be included. This is provided currently by EPA GPP Guidance, OGP Criteria Search Tool and the EU GPP Guidance.
- We appreciate that the document acknowledges the special characteristics of the commercial semi state sector.

Q2 Are there any other key aspects or actions that could be effective in implementing Green Public Procurement and that you think should be considered for inclusion in the Green Public Procurement Strategy and Action Plan?

Response:

- Is there any need to consider CSRD/CSDDD in the context of the Green Public Procurement Strategy and Action plan? And to explain how the Strategy and Action plan aligns or links in with the new legislation?
- In the Strategy and Action plan it refers to ISO20400 accreditation – “*All public bodies with an annual public procurement spend (on average over the previous three years) above €200m to secure ISO 20400:2017 accreditation by the end of 2025*”. On looking further into this it is not clear how this ISO is accredited (there is only reference to alignment with this ISO), can more information be provided around the accreditation process and who can accredit this standard?

Q3 In terms of the sectoral/product targets included in the draft Green Public Procurement Strategy and Action Plan, do you have any views in relation to the targets, the ambition level, and a timeframe for target achievement?

Response:

We note the acknowledgement of proportionality and relevance to the subject matter in the document which aligns to our own policies and procedure.

There are suggestions in relation to sectoral/product targets that could potentially be included/considered in relation to future tender processes, for example use of refurbished ICT products, use of organic food products, use of recycled paper etc. (pages 73 & 74).

Q4 Are there any other sectoral/product targets related to Green Public Procurement that you think should be considered for inclusion in the Green Public Procurement Strategy and Action Plan?

Response:

There could be potential in the below areas to develop targets, perhaps through the expansion of the existing guidance resources (e.g. EPA GPP Guidance):

- Software As A Service (SAAS)
- Platform As A Service (PAAS)
- Professional Services (across the board – ICT services, consultancy services, advertising services, architecture services, quantity surveys etc.).
- Machinery (we draw on elements relating to batteries, monitors, metals used, warranty etc., also more info on conflict minerals use in electric components this also relates to ICT guidance)
- Social Side of Procurement (guidance on social inclusion, accessibility, universal design, Diversity Equity & Inclusion, how to incorporate questions regarding employment of different social groups etc.) – noted in part 2.3
- Cloud computing in general
- Packaging – noted new regulation on packaging in part 3
- OGP Criteria Search tool – is there a possibility to include all search words from EPA guidance documents? Is there a possibility to enhance the search further by making the EU GPP guidance also searchable or incorporating some of this guidance?