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Please find our submission attached.

regards

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Draft Green Public
Procurement Strategy
Consultation,

Department of Environment,
Climate and Communications

Via Email : gpp@decc.gov.ie

17/11/2023

To whom it may concern,

Please find attached a response to the Draft Green Public Procurement Strategy Consultation.

Yours sincerely,

[Redacted Signature]

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Draft Green Public Procurement Strategy Consultation

Introduction

Coillte welcomes the opportunity to submit feedback on the Draft Green Public Procurement Strategy Consultation. As the state forestry company managing approx. 440,000 hectares of state-owned land, Coillte wish to maintain strong links with Government Departments, Local Government and both commercial and non-commercial state agencies. There are many areas in recreation and land use where currently we collaborate, and we would hope many areas under the climate action plan and specifically around public procurement, the circular economy and the supply of sustainable wood fibre where we can further collaborate and support Ireland's climate ambitions.

Forests have never been more important. They help tackle climate change, supply sustainable wood products to help build our homes, provide valuable habitats for our wildlife, and offer places for people to visit and enjoy that add to our health and wellbeing. Forests can deliver the multiple objectives of climate, nature, wood, and people and have the capacity to provide a wide range of economic, environmental, and social benefits. In 2022, we launched our Strategic Vision for our Future Forest Estate, which aims to sustainably balance and deliver the multiple benefits of Ireland's state forests across four strategic objectives: climate, nature, wood, and people. Our ambitions are to create new forests and manage our existing forests to enhance their ability to capture carbon, provide more habitats to enhance biodiversity, supply sustainable Irish wood products to support the creation of new homes, and create more incredible recreational spaces for the enjoyment of society and tourists. Coillte and the Irish forestry sector play a critical role in managing the existing forest carbon store, contributing to the reduction of greenhouse gas emissions, enhancing Ireland's energy security, and providing renewable materials to a climate resilient economy.

- 1. 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?**

Wood Supply - Certification of Sustainability

Sustainability is demonstrated and assured through the independent third-party certification of both forest management and the chain of custody (the supply chain from the forest through to wood processing and production). Certification has become widely specified across a range of wood products, ranging from construction timber to panel products, to joinery and wooden furniture. Certification schemes provide consumers with confidence that when they choose certified products they are assured they come from well managed forests which balance social, environmental and economic aspects of forest management sustainably.

Coillte has had independent certification of sustainable management of its forest and lands since 2001 and complies with two internationally recognised certification schemes, namely FSC® (Forest Stewardship Council®), and PEFC™ (Programme for the Endorsement of Forest Certification).

A 70% certified threshold applies for timber products to be labelled as sustainably certified by FSC and PEFC international standards. Society, wood processors and wood users demand that the wood products they need come from sustainable sources and certification provides that assurance.

Verify sustainable sources of wood: It is important that verified sustainable sources for wood are specified in the procurement process.

Wood & the Built Environment

Globally, construction and the building sector represents 38% of global energy related CO₂e emissions and reducing the carbon footprint of our future building stock is key to tackling climate change and achieving our net zero ambitions. Increasing the use of locally sourced timber and wood-based panel products in off-site modern methods of construction has the potential to increase the overall capacity to build faster, more sustainable, low carbon homes, while also supporting the expansion of our indigenous forestry and forest products sector.

Coillte, working with international experts, have undertaken significant analysis and produced a range of reports to validate the benefits of increased wood use and its contribution to meeting our climate targets. Recently, we contributed to a study by COFORD¹ on “forests and wood products, and their importance in climate change mitigation” which shows the potential to reduce net CO₂ emissions by 3.4 million tonnes over the coming years by changing the way we build our homes. These carbon savings are equivalent to removing 2.4 million cars from the road in one year or the equivalent of a 5.6% reduction in Ireland’s current annual emissions of 60 million tonnes of CO₂. A similar study from Germany’s Potsdam Institute found that a global boom in wood buildings could lock in up to 700 million tonnes of carbon a year.

Analysis undertaken by Coillte and Dr [REDACTED], the former Director-General of the Centre for International Forestry Research (CIFOR) and Director Climate, Energy and Tenure at Food and Agriculture Organisation (FAO) shows that in 2019, an overall 4.9 million m³ of wood fibre was processed into a range of wood-based products and bioenergy². On average each cubic metre of wood led to a downstream fossil/process emission displacement of 0.77 t CO₂e for a total displacement effect of 3.7 million t CO₂e, corresponding to about 6% of reported emissions for the Republic of Ireland.

Forestry and the forest products sector is one of the best examples of a functioning bioeconomy and circular economy. The Sink, Store and Substitution of Carbon has a triple beneficial effect to climate change mitigation, and to complete the circle, once trees are harvested, they are immediately replanted to commence the circular process once again. At their end-of-life, wood products have then

¹ <http://www.coford.ie/media/coford/content/COFORDSTRATEGYFULLFINALREPORTJAN2022240122.pdf>

² <https://www.coillte.ie/wp-content/uploads/2022/02/Holmgren-Report.pdf>

the potential to be reused in their current form, recycled to produce new wood products or used as a fuel to create heat or power.

Policy Drivers Supporting Increased Wood Use

The *Government's Climate Action Plan* sets out a detailed plan to achieve a 51% reduction in overall greenhouse gas emissions by 2030 and sets out a path to reach net-zero emissions by 2050, as committed to in the Program for Government and set out in the Climate Act 2021. The Plan lists the actions needed to deliver on our climate targets including the need to “research and develop alternatives to traditional building materials, and the increased use of low carbon materials” and provides a commitment to “working with industry stakeholders to increase the use of low carbon materials and technologies”.

The *EU Green Deal* requires significant reduction in greenhouse gases by 2030 across all sectors, including the built environment.

The *All-Ireland Roundwood Production Forecast 2021-2040* published by the Department of Agriculture, Food and the Marine predicts that the annual potential roundwood supply, will “increase from 4.1 million in 2021 to 7.9 million cubic metres by 2035” offering significant potential to develop and create new markets for wood products manufactured from home grown timber.

A recent study by COFORD on forests and wood products, and their importance in climate change mitigation shows potential to reduce net CO₂ emissions by 3.4 million tonnes over the coming years by changing the way we build our homes. These carbon savings are equivalent to removing 2.4 million cars from the road in one year or the equivalent of a 5.6% reduction in Ireland’s current annual emissions of 60million tonnes of CO₂. A similar study from Germany’s Potsdam Institute found that a global boom in wood buildings could lock in up to 700 million tonnes of carbon a year.

The new *EU Forest Strategy* for 2030 highlights that “promoting the use of wood products also requires demand-side actions, including combating misconceptions about fire risk and lack of durability, and acknowledging the multiple advantages of wood products in terms of reducing pollution and energy consumption during the construction, use and deconstruction phases. Construction engineers and architects should be incentivised to design buildings with wood”

Housing for All demands a new approach to housing delivery and needs the industry to maximise its use of modern technologies, methods of pre-manufacturing, delivery, and installation.

The terms of Reference of the newly established (Oct 2023) *Interdepartmental & Industry Steering Group on Timber in Construction* outlines the need to create the conditions to increase the use of timber in construction whilst ensuring the highest degree of building safety and property protection; the need to examine regulatory and standardization standards challenges; and to maximize the use of home-grown timber in construction.

Local Authorities - Leading by Example

Low carbon building materials should be given preference and central Government and local authorities should take the lead with the introduction of 'Wood First' procurement policies for all publicly funded capital projects such as social housing, schools, community facilities etc introducing requirements on a phased basis and providing appropriate support to procurers.

Policy needs to shift towards embodied emissions and several countries have strategies to limit Green House Gas (GHG) emissions in construction which include the issuing of carbon budgets for buildings and making Lifecycle Carbon Assessments (LCA's) a mandatory part of the planning process. Developers are required to demonstrate the measures taken to reduce a buildings carbon footprint and are benchmarked against international standards.

Government should embed mandatory LCA's and embodied carbon thresholds within local and national building plans. Whole Life-Cycle Carbon Assessment reporting should apply in the first instance to strategic developments and then be rolled out to all residential and commercial construction projects through targets, policy directives and regulation.

Local Authorities should support the advancement of the design and construction of new forms of sustainable building systems to validate performance and compliance with regulations. Demonstrating these new forms of construction will stimulate innovation, drive demand, grow skills and increase confidence in these building technologies, allowing local industry to build capacity and invest.

Coillte would welcome engagement on this topic and is keen to offer its expertise to projects aimed at developing more sustainable construction with wood.

Prioritise Sustainable Materials: Coillte asks Local Authorities to prioritize low carbon, sustainable and renewable building materials through the introduction of 'Wood First' procurement policies and the introduction of embodied carbon declarations/limits for all new builds.

Prioritise Sustainable Construction: Coillte asks Local Authorities to prioritize modern methods of construction, in the form of off-site, pre-manufactured timber frame building systems.

Support Innovation and Demonstration: Coillte asks Local Authorities to support the advancement of the design and construction of new forms of sustainable building systems

2. 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?

Below is a non-exhaustive list of related policies that directly or indirectly support the increased use of bio-based materials including wood in other jurisdictions. Similar green procurement policies could be implemented in an Irish context.

Country	Mechanism	Short summary of Initiatives Identified (but not limited to)
Canada/Quebec	<p>Wood First Act</p> <p>Mass Timber Action plan</p> <p>Developer funding</p> <p>Dedicated Government office of Mass Timber Implementation</p> <p>Québec's Wood Charter</p>	<p>The Wood first Act facilitates a culture of wood by requiring the use of wood as the primary building material in all new provincially funded buildings.</p> <p>The Mass Timber action plan supports the upscaling of pre-fabrication manufacturing facilities and technology.</p> <p>Mass timber funding program aims to accelerate mass timber innovation to provide funding for the incremental costs of demonstrating mass timber technology.</p> <p>Created the World's first government office dedicated to moving mass timber from niche to mainstream. Team 18 staff, including analysts, architects, building code experts. Annual budget approx. \$2.5M CAD.</p> <p>Québec's Wood Charter makes it compulsory for municipalities to compare different scenarios with at least one using wood as the main material and to rank the different projects according to their low carbon-emissions balance sheet, based on a standard methodology defined by Wood Institute Cécobois.</p>
France	Wood First Policy	<p>One of the main regulations related to the use of bio-based materials in buildings is the French Energy Transition Law for Green Growth, which sets out the objectives and strategies for reducing energy consumption and GHG emissions in buildings. The law encourages the use of renewable and bio-based materials in the construction and renovation of buildings and provides financial incentives - "Bois de Paris" encourages the use of wood in construction projects. The program provides technical support and financial incentives for developers who incorporate wood in their buildings. Paris aims at having 50% of all new public buildings constructed in >50% wood by 2024</p>
UK	UK Clean Growth Strategy,	<p>The Clean Growth Strategy: outlines the UK government's plans to reduce GHG emissions and promote clean growth.</p>

	<p>Bes 6001 - Responsible sourcing of construction products</p> <p>Hackney Council promote wood</p> <p>Wood for Good Campaign</p> <p>Innovate Project</p> <p>Homes England 25% MMC policy</p>	<p>The strategy includes measures to promote the use of low-carbon and sustainable building materials, including wood.</p> <p>The British Research Establishment developed the BES 6001 Standard for the Responsible Sourcing of Construction Products, along with an associated independent third-party certification scheme to help organisations manage and reduce the impacts throughout the construction supply chain. It requires a range of life-cycle criteria to be met as part of a construction materials procurement process, including the use of Environmental Product Declarations.</p> <p>Hackney Council were the first local authority in England to actively promote timber construction in its planning policy and showcase its achievements by offering guided tours of successful timber and mass builds in the borough. In 2012 the Council hosted its Wood First conference for architects, developers and planning officials from other local authorities to encourage the consideration of timber as a first-choice building material. Wood for Good, is a campaign to promote the suitability and sustainability of using wood in construction, sponsored the event which examined the benefits and limitations of building with timber as well as explaining its place within local and national planning policy.</p> <p>In recent years there has been £1.5m assigned to run the Innovate UK funded Transforming timber project and the recent launch of the transforming timber platform.</p> <p>Homes England social housing tender strategy for 25% of all social housing to be in MMC (which can include timber)</p>
Japan	<p>Natural Materials Bill</p> <p>Wood Use Points Programme</p>	<p>Japan's Ministry of Agriculture, Forestry, and Fishery drafted a bill to promote the use of wood in public buildings which became a law in 2010 (<i>Law Concerning Promotion of Use of Wood Materials for Public Buildings, Law No. 36 of 2010.</i>) The Law obligates the national and local governments to utilise wood materials for public buildings that have three stories or less. The Law also extends the due date for government loans given to qualified wood material manufacturers and eases development permits for qualified wood material manufacturers (<i>Law No. 36 of 2010, arts. 10-12.</i>). Subsequently, Japan introduced the Wood Use Points Programme.</p>
Switzerland	Wood Resource Policy	The Wood Resource Policy ensures that wood from Swiss forests is supplied, processed, and used in a way that is sustainable and resource efficient.

	Wood Action Plan	The Wood Action Plan is the most important policy instrument for the implementation of the Wood Resource Policy. Over 200 projects, which contributed to the fulfilment of the programme objectives, were implemented between 2009 and 2016. This was followed by the 2017–2020 Wood Action Plan. The purpose of the Swiss Wood Resource Policy is to support the consistent and sustainable harvesting of wood from Swiss forests and the resource-efficient use of wood as a raw material for a range of products. It establishes clear standards and targets for the use of wood as part of a cross-cutting mechanism to reduce the embodied energy and carbon in buildings, while increasing the opportunities for the local wood industry
Finland	Time for wood campaign Wood Build Programme	<p>The Finnish government’s Time for Wood campaign commenced in 1997, aimed to increase the use of wood products, to promote value-added wood processing and manufacturing, to increase wood product export and create new jobs in the wood industry.</p> <p>The Finnish Wood Building Program is a joint government undertaking coordinated by the Ministry of the Environment and aims at increasing the use of wood in urban development, public buildings as well as large constructions such as bridges and halls. The programme also aims to diversify and expand different applications for wood while creating as much value added as possible.</p> <p>Wood construction is promoted as part of the government’s spearhead project Wood on the Move and new products from forests. The Wood Building Program promotes the use of wood by strengthening the skills base in the industry, updating legislation, and building regulations relevant to wood construction and by providing evidence-based information on wood construction. The goal of the programme is to entrench wood construction as an integral facet of the Finnish construction industry by 2020. The program incorporates government subsidies for municipally funded wood construction projects, e.g. housing development, guidelines for innovative planning and development models, engagement with developers together with the client organisations. It is a stated aim of the Strategic Programme for Finland’s Forest Sector that 45% of new building volume to be wood by 2025.</p>
Tasmania	Wood Encouragement Policy	Tasmania’s state-wide Wood Encouragement Policy was incorporated as a procurement policy within the Tasmanian Government Treasurer’s Instructions. The policy ensures that

		sustainably sourced wood is fully considered, where feasible, in Tasmanian Government procurement, particularly for new buildings and refurbishment projects.
Netherlands	Legislation mandated biobased materials	City of Amsterdam passed legislation mandate that all new buildings constructed after 2025 to consist of at least 20% wood or biobased materials - Netherlands Circular in 2050 aims to use products and materials which can be re-used, recycled or environmentally friendly disposed. Construction sector is one of the main targets
New Zealand	Build In Wood Policy	The current New Zealand (Labour) government's 2017 manifesto states that; "All government funded project proposals for new buildings up to four storeys high shall require a build-in-wood option at the initial concept and/or request-for-proposals stage", and subsequently that; "Due to advances in engineering and wood processing technologies, we will increase the four storey requirement to 10 stories".
Denmark	Embodied Carbon regulation	New Danish requirements require that all new buildings are required to document their environmental impact over a lifespan of 50 years through a Life Cycle Analysis calculation, and that new buildings above 1000 square meters must comply with strict carbon targets with maximum levels of carbon dioxide equivalent per square meters per year allowable.
Belgium	Federal Plan	Belgium is implementing the Belgian Federal plan for sustainable development to promote use of wood in construction, public procurement and raising awareness of the benefits of using wood in construction
Germany	Charter for Wood 2.0 German Resource Efficiency Programme III	Reviewing/adjusting Model Building Code (Musterbauordnung, MBO), guidelines, the Fee Structure for Architects and Engineers (Honorarordnung für Architekten und Ingenieure, HOAI), building regulations of federal states. Freiburg (Germany) has a dedicated policy to wood use in the private sector.
Sweden	Various municipalities promoting timber use	Swedens Timber construction office to promote timber use. Municipality of Trastad Digital platform to help create public strategies for building with wood, 'Timber on Top' strategy for adding additional stories to existing buildings. https://www.trastad.se/english/ Municipality of Vaxjo strategy on wood building introduced in 2005. New strategy of Backaslov where 34 companies buy and build new homes and building must be wood. https://smartcitysweden.com/best-practice/327/the-modern-wooden-city-wooden-buildings-for-a-smaller-

		carbon-footprint/ Sweden wants to build an entire city from wood (economist.com).
Western Australia	Wood Encouragement Policy	Australia spread wood encouragement policies at local government level through the support of an environmental foundation, PlanetArk and its “Make it Wood” campaign. Councils and states are encouraged and supported to adopt a WEP based on a pro forma policy. Since 2014, 22+ authorities have adopted such policies.

3. 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?

Embodied carbon regulation needs to be fast tracked. The Danish model may be adaptable in an Irish context. Denmark has introduced embodied carbon limits into building regulations, a policy which has been backed by cross-parliamentary support. These new Danish requirements require that all new buildings must document their environmental impact over a lifespan of 50 years through Lifecycle Assessment Calculation [fig.1]. For new buildings greater than 1,000m², a threshold limit value of 12kg CO₂-eq/m²/year is now in force. This threshold value comprises all building related greenhouse gas emissions. New constructions smaller than 1,000m² are required to conduct a Life Cycle Assessment but without a threshold limit value for now. Over time, at two-year intervals, this limit becomes mandatory, and the threshold is lowered for all buildings. This limit will continue to be lowered, meaning the environmental impact of construction in Denmark will decrease dramatically over the next decade.



Fig 1 : Danish Embodied Carbon Regulations 2023 - 2029

- 4. 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?**

Reference the response to question 2.

- 5. Have you any other comments or feedback on the content of the draft Green Public Procurement Strategy and Action Plan?**

n/a