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Subject: CEWEP Green Public Procurement Consultation Response
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To Whom It May Concern,

Please find enclosed CEWEP Ireland's response to the DECC's Green Public Procurement Consultation. Should you have any further questions or comments, please do not hesitate to contact us.

Best regards,

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Response to Public Consultation on the Draft Green Public Procurement Strategy and Action Plan

To Whom It May Concern,

Please find enclosed CEWEP Ireland's response to the DECC's Draft Green Public Procurement Strategy and Action Plan.

Yours Faithfully,

[Redacted Signature]

[Redacted Name], Policy Analyst, CEWEP Ireland.

Introduction

CEWEP Ireland welcomes the opportunity to respond to this consultation on the Draft Green Public Procurement (GPP) Strategy and Action Plan 2023-2027. Members of CEWEP Ireland aim to promote key components of our future low carbon economy and are actively engaged in developing decarbonization projects aimed at enhancing the circularity of industrial bottom ash, optimizing district heating systems, and advancing innovative hydrogen projects, demonstrating a collective commitment to sustainability and circular economy practices within these crucial sectors. Green Public Procurement can serve as a strategic approach to bolstering fledgling economies in need of support while harnessing the potential of sustainable waste management practices.

Incinerator Bottom Ash

Ireland's forthcoming draft National Waste Management Plan, slated for release in Q1 2024, lists an action to explore the circular potential of Incinerator Bottom Ash through regulatory mechanisms governing its by-product or end-of-waste status. A by-product of the waste to energy process is incinerator bottom ash (IBA). Incorporating recycled aggregates from IBA into a Green Public Procurement (GPP) policy will represent a significant step towards achieving sustainability objectives in Ireland. By actively promoting the use of IBA aggregates (IBAA) in the construction industry, public authorities will contribute to the reduction of environmental impacts associated with the traditional extraction of virgin material. The adoption of policies that endorse the reuse of recycled aggregates from incinerator bottom ash as an alternative raw material for the construction industry not only diverts waste from landfills but also fosters a circular economy.

A well-designed GPP framework, together with clear guidelines and standards, would incentivise the construction industry to integrate recycled IBAA into its construction projects. This approach ensures that public procurement practices actively support and drive the market for environmentally friendly alternatives. By endorsing the utilisation of recycled materials like incinerator bottom ash, policymakers can encourage innovation and investment in sustainable practices within the construction sector.

Hydrogen

In July 2023, the DECC released its Hydrogen Strategy, presenting a vision for hydrogen's integral role in Ireland's energy system, envisioning its pivotal contribution to a zero-carbon economy long-term. Implementing Green Public Procurement (GPP) strategies for low carbon hydrogen represents an opportunity to stimulate economic growth in Ireland while advancing sustainable energy practices. By prioritising the procurement of low carbon hydrogen for public projects and services, authorities can effectively create a market demand that incentivises the development of cleaner energy solutions. This not only contributes to reducing Ireland's carbon footprint but also fosters investment in the burgeoning low carbon hydrogen sector.

To kickstart the economy, policymakers should establish clear criteria within GPP frameworks that favour suppliers offering low carbon hydrogen solutions. This can include specifying emissions criteria and sustainability benchmarks to ensure procured hydrogen aligns with Ireland's climate goals and EU legislation. Additionally, public-private partnerships can be integrated into GPP policies to facilitate collaboration between government entities and businesses, promoting research and development initiatives that further advance low carbon hydrogen technologies. By leveraging GPP to promote low carbon hydrogen, Ireland can position itself as a leader in sustainable energy practices, create jobs in emerging industries, and establish robust routes to market for environmentally friendly technologies.

CEWEP recognise the EPA's GPP guidance on hydrogen for decarbonising heavy goods vehicles but suggest a broader perspective in line with national and European policies. We would propose expanding hydrogen use beyond HGVs to include buses, trains, emergency services, and public transport, advocating for accelerated infrastructure development.

District Heating

In August 2023, the District Heating Steering Group report was launched at Dublin Waste-to-Energy. It will annually inform the Government of progress in district heating development, including actions for expansion, legislative development, EU Directive incorporation, and evidence-based suggestions on district heating targets for the DECC. Green Public Procurement (GPP) can play a pivotal role in promoting sustainable district heating solutions in Ireland. By incorporating environmental criteria into the procurement processes, public authorities can drive the adoption of district heating systems that

prioritise energy efficiency, integrate innovative technologies, utilise renewable energy sources, and reduce overall carbon emissions.

GPP can be instrumental in promoting the development of district heating infrastructure in urban planning projects and public buildings, incentivising the integration of energy-efficient and environmentally friendly heating systems. By doing so, Ireland can not only reduce its dependence on fossil fuels but also create a supportive environment for businesses involved in the district heating sector, stimulating economic growth in the renewable energy industry. Overall, GPP serves as a powerful tool to drive the transition toward sustainable and resilient district heating systems in Ireland.

Conclusion

Expanding GPP to encourage circular economy practices and energy-efficient opportunities will enhance Ireland's chances of reaching its climate action targets. To do this, this Strategy and Action Plan needs to stimulate and support burgeoning technologies to ensure their viability.