

From: [REDACTED]
To: [DECC GPP](#)
Subject: Submission
Date: Friday 17 November 2023 10:59:49
Attachments: [Green Procurement Submission Cre.pdf](#)

CAUTION: This eMail originated from outside your organisation and the BTS Managed Desktop service. Do not click on any links or open any attachments unless you recognise the sender or are expecting the email and know that the content is safe. If you are in any doubt, please contact the OGCIO IT Service Desk.

Dear Sir/ madam,

Please find attached the submission.

Kind Regards

[REDACTED]

[REDACTED]

Chief Executive Officer

Cré (Composting & Anaerobic Digestion Association of Ireland)

Po Box 135, Enfield, Co. Meath, Ireland

T: [REDACTED]

E: [REDACTED]

W: www.cre.ie

Please note: I have limited access to emails. I will try to response to an email on the following working day.

The information contained in this email and in any attachments is confidential and is designated solely for the attention and use of the intended recipient(s). This information may be subject to legal professional privilege. If you are not an intended recipient of this email, you must not use, disclose, copy, distribute or retain this message or any part of it. If you have received this email in error, please notify us immediately and delete all copies of this email from your computer system(s). VIRUS WARNING: You are requested to carry out your own virus check before opening any attachment. Cré accepts no liability for any loss or damage which may be caused by software viruses.



Submission to the

Department of Environment, Climate and Communications

On

DRAFT Green Procurement Strategy and Action Plan

From:

**Cré – Composting and Anaerobic Digestion
Association of Ireland CLG**

November 17th, 2023

INTRODUCTION

Cré welcomes the opportunity to respond to the Department of the Environment, Climate and Communications' consultation on the Draft Green Procurement Strategy and Action Plan.

Question 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?

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

Cré Response:

Cré Proposal Green Public Procurement of Compost/ Digestate

Green Public Procurement e.g. requirement for all state procurement in which works involves 'new' soil for that soil to contain a minimum 10% amount of high quality compost/digestate procured from a facility within a specified proximity to the works. Such works include highways, parks and gardens maintenance, e.g. requirement for all new tree planting schemes to use soils / substrates.

Different soils, environments and applications have different needs e.g. a soil for landscaping in a park will be different to new road verges, and thus it is necessary to incorporate high quality composts and digestates into existing or new relevant specifications. It can be anticipated that all such compost/digestate must meet end of waste and therefore a relevant national specification, potentially exceeding the requirements in the Fertiliser Regulations.

GPP does not have a good track record of being implemented in many parts of the world. In order to drive the Circular Economy, GPP is an essential building block and therefore there must also be a stronger regulatory framework ensuring that national and local governments apply GPP.

BACKGROUND INFORMATION ON EXISTING RELEVANT GPP POLICIES

2006 National Strategy on Biodegradable Waste states:

Public Sector Procurement Policy

The DoEHLG will co-ordinate the development of a procurement policy whereby waste-derived compost can be used in suitable public sector projects. Such a measure will help accelerate the development of markets especially in the initial years of expansion of composting capacity. This policy will be implemented on a pilot level in a dedicated region initially.

The Connaught Region is suggested for this purpose since there are two biowaste composting plants already in operation, and a Regional Waste Management Co-ordinator is in place.

This process will identify the type of capital works projects where compost could replace other materials purchased, and what grades and types of compost can be usefully applied in different schemes.

The guidance note issued by the Government Contracts Committee on *Environmental Considerations in Public Procurement* (GCCC 04/04) will assist local authorities in the support of market development for compost.

Compost Procurement Requirements- Illinois

A new law, the Compost-Amended Soil Construction Act (HB4790), requires that any state agency undertaking a construction project that incorporates use of offsite soil — and that is located within 20 miles of any Illinois Environmental Protection Agency-permitted composting facility — must request a separate bid for compost-amended soil for that project. “Compost-amended soil” is defined as soil that has been mixed with source separated landscape waste or a mixture of both source separated landscape waste and source separated food scraps to meet an organic matter content of not less than 25 percent, and where the compost component meets the certification requirements of the US Composting Council’s Seal of Testing Assurance (STA) program or any other equivalent, nationally recognized program.

Model Compost Procurement Policy Developed by the Environmental Law Institute and Natural Resources Defense Council

A new model compost procurement policy developed by the Environmental Law Institute (ELI) and the NRDC (Natural Resources Defense Council) is designed to be an off-the-shelf, easily adaptable tool that requires municipalities to purchase finished compost products when appropriate for use in public projects such as landscaping, construction, and storm water management — provided it is not cost-prohibitive to acquire (defined in the policy as “the cost of compost exceeding the cost of an alternative product by more than 10%”).

[Model Compost Procurement Policy | BioCycle \(Sept 2021\)](#)

California Department of Water Resources ‘Model Water Efficient Landscape Ordinance’

On July 15, 2015 California approved revisions to the Model Water Efficient Landscape Ordinance (MWELO), which promotes efficient water use in new and retrofitted landscapes.

The following is a summary of the Ordinance:

One major change is **new requirements for compost and mulch**. To improve soil health and increase water retention, at least four cubic yards of compost per 1,000 sq. ft of area must be incorporated into the soil. At least three inches of mulch must be applied to all exposed soil surfaces in planting areas.

As of December 1, 2015, the Ordinance will apply to new landscape projects equal to or greater than 500 sq. ft.

See: [Water Efficient Landscape Ordinance \(WELO\) | Planning and Building \(smcgov.org\)](#)

Compost Procurement and Use, Washington State

House Bill 2713, Compost Procurement and Use, was passed by the Washington State legislature in June 2020. The [procurement law](#) ensures that compost created from municipal recycling programs moves onto state, county and city projects so that all of the benefits of compost can be captured. It also encourages cities with organics collection to enter into compost buy back agreements with their organics processors, closing the loop on their organics recycling programs.

[Washington State’s Compost Procurement Law | BioCycle](#)