

From: [REDACTED]
To: [DECC GPP](#)
Cc: [EnterpriseIRL](#)
Subject: Enterprise Mobility response to consultation on Draft Green Public Procurement Strategy & Action Plan
Date: Friday 17 November 2023 13:56:38
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[image002.png](#)
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[Response from Enterprise Mobility on DECC GPP Strategy.pdf](#)

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Dear Sir/Madam,

Please find attached the response from Enterprise Mobility on the Draft Green Public Procurement Strategy & Action Plan.

We look forward to further engagement with DECC on this issue, in particular our recommendations around a framework for vehicle procurement and the Clean Vehicles Directive. We will follow up shortly regarding a bilateral meeting with DECC officials on this issue.

Kind regards,

[REDACTED]

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Draft Green Public Procurement Strategy and Action Plan Public Consultation Questions

Response from Enterprise Mobility

No.	Question
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?
Response:	
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?
Response:	<p>As per the Public Sector Climate Action Mandate 2023, public sector organisations should promote the use of "shared mobility options as an alternative to car use among employees and visitors by creating and maintaining facilities (both inside and outside of buildings) that support such options". This should include the provision of shared mobility parking and charging stations" as appropriate. Given the significant environmental benefits offered by fleet sharing, we believe this reference to shared mobility parking and charging stations is a very positive step, which should also be included in the wider Green Public Procurement Strategy and Action Plan, including in those parts of the Strategy which reference elements within the Public Sector Climate Action Mandate 2023 specifically. This would fully align with the Government's targets under Climate Action Plan 2023, which notes that increasing the use of new shared car initiatives (such as car clubs) to reduce private car ownership will be crucial to meeting transport emissions targets and embracing the 'Avoid, Shift, Improve' approach.</p> <p>As noted in the draft Strategy, the Clean Vehicles Directive (CVD) will be central to green public procurement of vehicles. Given the inclusion of the procurement of rental vehicles in the revision of the CVD, the Government's</p>



	<p>initiatives related to vehicle procurement within the Green Public Procurement Strategy & Action Plan should also specifically include provisions for rental vehicles. Such provisions should then also be reflected in updates to the Public Sector Climate Action Mandate, as well as the EPA's GPP criteria for road transport vehicles and services. This will help to improve the accessibility of rental vehicles, and shared mobility more generally, to public bodies, local authorities, semi-states, etc.</p>
3	<p>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?</p>
Response:	
4	<p>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?</p>
Response:	<p>Given the significant environmental benefits of vehicle sharing for fleets, the Government could consider including voluntary targets for shared vehicles within the Strategy, and specifically highlight those industries where shared fleets have been shown to be particularly effective. As shown by numerous voluntary pilot schemes (e.g. SEAI scheme for businesses), electric fleet sharing and rental schemes play an instrumental role in offering organisations the opportunity to trial an EV. Voluntary targets on fleet sharing would further incentivise fleet electrification in the area of public procurement.</p> <p>The EPA's GPP criteria for road transport vehicles and services is a welcome guide to procurement for reducing transport emissions for public bodies. Currently vehicle rental and sharing are not included among the list of criteria, despite the clear environmental benefits that such schemes provide for businesses. As noted above, the EPA can further align the GPP criteria and the CVD with the Government's objectives on transport emissions by including specific criteria and recommendations on shared fleet schemes. This can be particularly beneficial for greening cities and urban environments, as noted in a recent European Commission's report on the public procurement of sustainable urban mobility measures, which notes that public procurement "can be a means to push new technologies, such as electric vehicles or innovative business models such as shared mobility".</p>



Furthermore, given the clear environmental benefits of reduced vehicle ownership, including targets on reducing business ownership of vehicles could be included in the Strategy. **The promotion of alternative models of fleet ownership could also be promoted and incentivised via the new procurement eForms proposed in the Strategy, by including specific clauses pertaining to shared fleets in order to incentivise reductions in vehicle ownership, in particular of grey fleets.**

About Enterprise Mobility:

Enterprise Mobility (previously Enterprise Holdings) is the world's largest private mobility provider, operating more than 2 million shared assets across the globe. Since 1994, Enterprise's European activities have expanded rapidly, with over 170,000 vehicles across company-owned operations in France, Germany, Ireland, Spain and the United Kingdom. In Ireland, Enterprise provide vehicles on demand via Enterprise Rent-a-Car, employing over 200 people in 25 branches across the country.



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