

From: [REDACTED]
To: [DECC GPP](#)
Subject: GNI - GPP Consultation Response
Date: Friday 17 November 2023 12:27:51
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[Draft Green Public Procurement Strategy and Action Plan Consultation Response GNI.pdf](#)

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Dear Sir/Madam,

Please find attached Gas Networks Ireland's Draft Green Public Procurement Strategy and Action Plan Consultation Response.

If you have any queries, please do not hesitate to make contact.

Kind regards,

[REDACTED]

[REDACTED]

Gas Networks Ireland,
P.O. Box 51, Gasworks Road,
Cork, Ireland. T12 RX96.



Tá an fhaisnéis á seachadadh dírithe ar an duine nó ar an eintiteas chuig a bhfuil sí seolta amháin agus féadfar ábhar faoi rún, faoi phribhléid nó ábhar atá íogair ó thaobh tráchtála de a bheith mar chuid de. Tá aon athsheachadadh nó scaipeadh den fhaisnéis, aon athbhreithniú ar nó aon úsáid eile a bhaint as, nó aon ghníomh a dhéantar ag brath ar an bhfaisnéis seo ag daoine nó ag eintitis nach dóibh siúd an fhaisnéis seo, toirimiscthe agus féadfar é a bheith neamhdhleathach. Níl Líonraí Gáis Éireann faoi dhliteanas maidir le seachadadh iomlán agus ceart na faisnéise sa chumarsáid seo nó maidir le haon mhoill a bhaineann léi. Ní ghlacann Líonraí Gáis Éireann le haon dliteanas faoi ghnímh nó faoi iarmhairtí bunaithe ar úsáid thoirmiscthe na faisnéise seo. Níl Líonraí Gáis Éireann faoi dhliteanas maidir le seachadadh ceart agus iomlán na faisnéise sa chumarsáid seo nó maidir le haon mhoill a bhaineann léi. Má fuair tú an teachtaireacht seo in earráid, más é do thoil é, déan teagmháil leis an seoltóir agus scríos an t-ábhar ó gach aon ríomhaire. Féadfar ríomhphost a bheith soghabhálach i leith truaillithe, idircheaptha agus i leith leasaithe

neamhúdaraíthe. Ní ghlacann Líonraí Gáis Éireann le haon fhreagracht as athruithe nó as idircheapadh a rinneadh ar an ríomhphost seo i ndiaidh é a sheoladh nó as aon dochar do chórais na bhfaighteoirí déanta ag an teachtaireacht seo nó ag a ceangaltáin. Más é do thoil é, tabhair faoi deara chomh maith go bhféadfar monatóireacht a dhéanamh ar theachtairachtaí chuig nó ó Líonraí Gáis Éireann chun comhlíonadh le polasaithe agus le caighdeáin Líonraí Gáis Éireann a chinntiú agus chun ár ngnó a chosaint. Líonraí Gáis Éireann cuideachta ghníomhaíochta ainmnithe, faoi theorainn scaireanna, atá corpraithe in Éirinn leis an uimhir chláráithe 555744 agus a tá hoifig chláráithe ag Bóthar na nOibreacha Gáis, Corcaigh, T12 RX96.

Go raibh maith agat as d'aird a thabhairt.

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Thank you for your attention.



Gas
Networks
Ireland

Draft Green Public Procurement Strategy and Action Plan 2023-2027

Consultation Response

17th November 2023

1. Introduction & Executive Summary

Gas Networks Ireland welcomes the opportunity to respond to the Department of the Environment, Climate and Communication's public consultation on the Draft Green Public Procurement Strategy and Action Plan 2023 - 2027.

GNI fully supports the Strategy and Action Plan and believes it will significantly increase sustainable procurement throughout the public sector.

Gas Networks Ireland has provided specific responses to the consultation below, but here are the key messages we wish to relay:

- Implementing the green public procurement strategy and action plan supported with a range of measures will significantly support sustainable procurement practices.
- Capacity building, collaboration and standardised frameworks will increase effectiveness of implementation.
- Direct support to the public sector and the market will enable the transition to the Green Economy and delivering targets.
- Standardised industry approach to calculating embodied carbon of civil projects is required.
- Public bodies above €50m should be mandated to complete an independently assured ISO 20400 gap analysis and establish a project plan to deliver sustainable procurement.
- Consider including basic guidance in relation to European Sustainability Reporting and Due Diligence Directives.
- A measured and balanced consideration is required before introducing mandated minimum environmental / sustainability criteria.
- Measures to enhance collaboration will support implementation of strategy and action plan.

2. Consultation Questions

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?

GNI believes that implementing this comprehensive green public procurement action plan has the potential to significantly increase sustainable procurement practices across the public sector. Such measures can lead to the adoption of environmentally friendly products and services, encouraging innovation in sustainable technologies and practices. In addition to this, promoting awareness campaigns, providing incentives, establishing clear guidelines, fostering partnerships with eco-conscious suppliers and conducting regular assessments of the procurement process can further bolster GPP efforts.

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?

GNI would like to suggest three areas for increasing effectiveness in implementing strategy:

- Capability Building: Include a competency framework for delivering GPP;
- Collaboration: Develop a collaboration forum between Industry and Public Bodies;
- Standardised Implementation Framework: Develop a standardised GPP Framework: Roadmap, Methodology and Tools, Competencies, etc.

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?

GNI agrees and supports the approach as detailed in the Strategy. The targets are ambitious, and we support that ambition. There needs to be an awareness that, support is required for Public Sector and the Market to transition to the Green Economy. GNI fully supports this transition and will be an enabler in the achievement of this goal. Please refer to further comments below.

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?

GNI are currently assessing the embodied carbon of construction/civil projects. It would be useful to have a standardised industry approach to calculating embodied carbon of civil projects. GNI are currently working to develop a tool to help our asset managers and designers to understand the embodied carbon of civil projects.

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

GNI suggests the following:

- In relation to A6: "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." GNI believes ISO20400 Sustainable Procurement is an excellent standard that will enable organisations to deliver sustainability in their procurement events. GNI suggest

that the threshold be dropped to annual procurement €50m for implementation of ISO 20400. GNI suggests that A6 should be amended to “All public bodies with annual public procurement spend (on average over the previous three years) above €50m should complete an independently assured ISO 20400 gap analysis and establish a project plan to deliver sustainable procurement. By end of 2025, Public Bodies must provide independent assurance that significant process has made on its plans.” (Please note ISO 20400 is not accredited to date).

- GNI suggests it would be helpful to include some guidance on the forthcoming European Sustainability Reporting Standards, European Corporate Sustainability Reporting Directive and European Sustainability Due Diligence Directive as they apply to Green Procurement. Recognising that the implementation of these directives is only commencing it might be useful to include some basic advice.
- GNI fully supports the establishment of Sustainability/Environmental Criteria. From GNI's experience, care should be taken and significant market engagement, before introducing minimum criteria, as this may significantly disadvantage suppliers in the market. It should be recognised suppliers are at different levels in terms of sustainability maturity.
- In terms of the GPP Strategy and Action Plan governance mechanism (reporting and “Comply or explain”), there should be an awareness that the new EU Sustainability Directives is a step change in the mandate to implement sustainable procurement and sustainable supply chains which will initially apply to large organisations but in time apply to all procurement expenditure.
- The GPP Strategy and Action plan references an extensive range of targets across industry and categories of spend. Many of these targets are demanding and need to be ambitious. Underlying these targets is the ability of the public sector to implement targets and the market capability to respond. Many targets require significant innovation and eco-engineering of products, works, materials etc. It should be emphasised in the strategy, the significant requirement for industry collaboration. The document does include sections on collaboration and innovation. GNI suggests these should be enhanced to ensure that there is a step change in GPP target delivery.