

**From:** [REDACTED]  
**To:** [DECC GPP](#)  
**Cc:** [REDACTED] ([Generation and Trading](#)); [REDACTED]  
**Subject:** H2Irl response - Public Consultation on the Draft Green Public Procurement Strategy and Action  
**Date:** Friday 17 November 2023 08:08:29  
**Attachments:** [image001.png](#)  
[Green Public Procurement Strategy Consultation Hydrogen Ireland Response .pdf](#)  
**Importance:** High

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Good morning,

Please find attached Hydrogen Ireland response to the Public Consultation on the Draft Green Public Procurement Strategy and Action.

If you have any questions, please do not hesitate to contact us.

Kind regards,

[REDACTED]



**E:** [REDACTED]  
**T** [@IrelandHydrogen](#)  
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*The Association for Energy, Mobility, Industry & Community*

Circular Economy – Strategic Policy Division  
Department of the Environment, Climate and Communications  
Newtown Road  
Wexford  
Y35 AP90

17<sup>th</sup> November 2023

**Re: Public Consultation on the Draft Green Public Procurement Strategy and Action Plan**

Dear Sir/ Madam,

Hydrogen Ireland welcomes the opportunity to respond to this consultation on the Draft Green Public Procurement (GPP) Strategy and Action Plan 2023-2027. Hydrogen Ireland aims to promote the role of hydrogen and fuel cells to enable them to become key components of our future low carbon economy on the island of Ireland.

Our vision is for the hydrogen market to quickly gather pace, moving from the current state of modest grey hydrogen consumption at individual locations, to a large-scale, interconnected domestic renewable hydrogen market with great potential for export. Renewable hydrogen produced from wind and solar provide a variety of benefits including:

- **Decarbonisation-** a zero-carbon fuel that can support a balanced energy system.
- **Energy security-** given Ireland's renewable potential can support indigenous production.
- **Economic development-** in the form of a multi-billion-euro sector that can support job growth and exchequer funding as well as regionally balanced growth through local hydrogen clusters.

We believe there is a significant opportunity for renewable hydrogen and its derivatives to play a fundamental role in decarbonising publicly procured products and services. This is relevant to the current GPP strategy under consideration, applying from 2023-2027, and will increase in importance as hydrogen production scales up over the coming years.

We acknowledge that the EPA's GPP guidance document outlines that hydrogen can play a role in decarbonising heavy good vehicles. However, to align with several European and domestic policies, most notably the National Hydrogen Strategy and Climate Action Plan, we feel that there's an opportunity for a broader perspective to be taken on where renewable hydrogen and its derivatives

  
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can play a role in GPP. In terms of further opportunities for renewable hydrogen in GPP we believe the following are most relevant:

#### **More Expansive Transport Eligibility**

We support the fact that the EPA GPP standard includes hydrogen and fuel cell technologies for road transportation. However, these apply to HGVs only. We believe these technologies would also be advantageous for various public services such as buses and coaches, trains, light commercial and passenger vehicles. They may be particularly well-suited to ambulances, fire tenders, Garda fleet, taxis, public transport, first responders and other emergency services<sup>1</sup>. Build-out of adequate refuelling infrastructure could support this and is required by EU policy from 2030, however, we believe this should be expedited to allow for early adoption <sup>2</sup>.

#### **Further Non-Transport Uses**

There are various non-transport uses for renewable hydrogen that could be relevant including: dispatchable generation, combined heat and power plant, hydrogen cookers, boilers, water heaters, and hydrogen gas space heaters. Hydrogen ready equipment and appliances are available and could be included for consideration in GPP under the following category- Energy Related Products, Heating Equipment, Indoor and Outdoor Lighting<sup>3</sup>. The potential role of renewable hydrogen fuelled back-up power generation could be considered in the context of providing climate change resilience to the provision of public services.

Overall, we suggest that the GPP Strategy and Action Plan broadens the eligibility for renewable hydrogen and its derivatives as well as fuel cell vehicles. Not only would this help to ensure policy coherence but it would also enable the public sector to be a leader in hydrogen adopting, playing a key role in decarbonisation, as intended by the GPP strategy.

Thank you for taking the opportunity to review our response. If you have any questions or would like further information, please don't hesitate to get in touch.

Yours faithfully,

[Redacted Signature]

Chairperson  
Hydrogen Ireland  
[sent by email]

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<sup>1</sup> Note: Dublin Bus already successfully operates three hydrogen fuel cell double decker buses.

<sup>2</sup> Alternative Fuel Infrastructure Regulation

<sup>3</sup> Note- credits could also be purchased in the future for renewable hydrogen blending in the natural gas network where this occurs in future, subject to necessary policy and approvals.