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To: [DECC GPP](#)
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Subject: IrBEA Consultation response
Date: Friday 17 November 2023 17:24:14
Attachments: [image001.png](#)
[IrBEA response to GPP Consultation Final.pdf](#)

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Dear Sir/madam

Please find attached the Irish Bioenergy Association(IrBEA) response to the green public procurement draft guidelines.

Please acknowledge receipt via email.

We welcome the opportunity to further discuss or engage with the Department should the need arise.

Regards

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IrBEA Project Executive

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To: gpp@decc.gov.ie

Date: 17th November 2023

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

Dear Sir/Madam,

Thank you for the opportunity to contribute to this consultation on behalf of our members.

We have answered the specific consultation questions below but would like to make the following general points.

IrBEA is the representative organisation for the bioenergy sectors on the island of Ireland. Our membership spans the differing bioenergy sectors of solid biomass, biogas/biomethane, biofuels, biochar, wood fuels and energy crops. IrBEA members strongly believe that bioenergy is a key component of our decarbonisation strategies and the use of locally produced bioenergy feedstocks for the provision of both heating and transport needs should be emphasised as sustainable and viable options for those involved in green public procurement.

We feel more could be done to promote schemes such as the SEAI administered Support Scheme for Renewable Heat (SSRH) for suitable public buildings where solid biomass is a good choice for heating needs. The role that a developing biomethane sector could play in decarbonising delivery or transport contracts or fleets is also worthy of consideration. Both of these sectors not only allow for the use of locally grown energy sources but also have an added social dimension in that employment opportunities are created along the supply chains.



Biofuels that are certified as compliant and governed by the Renewable Energy Directive offer real sustainable choices for consideration. Some IrBEA members are involved in the production and sale of liquid biofuels that are capable of acting as a drop in and blended fuel for both kerosene fired boilers and as a diesel substitute for road transport vehicles. Some IrBEA members are involved in the production of both biodiesel and bioethanol- two biofuels that are already assisting in decarbonising existing road transport vehicles- while this may not be as important for inclusion in draft guidelines, it is simply to emphasise the point that the use of bioenergy in many cases offers sustainable green procurement choices.

The public sector should be taking a lead in green procurement- it has been disappointing to see over the last few years numerous tenders for fossil fuel replacement equipment when this could be replaced with bioenergy based solutions. We strongly encourage the government to show ambition and lead the transition regarding green procurement. We welcome the opportunity to further engage with the department on this to discuss the options available.

Yours sincerely,

██████████
██████████ B.E. C. Eng MIEI
Chief Executive Officer
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Project Executive
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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

Response

The approach outlined should lead to increased levels of green public procurement as long as adequate training materials and sample case studies accompany each of the potential categories of expenditure.

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

As mentioned, there will exist a need to provide ongoing and regular training as any new rules or guidelines are rolled out where the inclusion of as many and as varied case studies as possible across the various sectors of expenditure be provided to public procurement representatives. From a bioenergy related perspective, expertise exists within the Irish Bioenergy Association (IrBEA) membership that could assist in the providing existing case studies that could be adapted for use by OGP or other relevant departments.

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?

Response

IrBEA welcomes the T9 target stating all new heating systems by 2024 to be fossil fuel free- this will assist in driving the market for biomass and biofuel based heating systems in buildings that are being retrofitted or upgraded.

With regard to T11 on road transport vehicles and the need to be zero emissions, while electrification of smaller vehicles is the likely strategy, the potential use of zero emissions biomethane for HGVs is likely to become more common place as the sector and availability of biomethane develops. Numerous commercial fleets are already actively looking to roll out these types of vehicles as part of decarbonisation efforts and IrBEA are of the opinion that any green public procurement guidelines produced should make reference to biomethane vehicles as a potential option for some when exploring contracts for delivery or haulage.

T3 sets out that adequate food waste segregation form part of 100% of contract arrangements for canteen services- this in welcomed and in instances where waste can not be prevented, appropriate mechanisms to ensure food waste gets diverted to composting or biogas production could further improve the green credentials of any contracts awarded.

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?

Response

It would be good to see some level of ambition set in relation to increased levels of uptake of biomass heating systems for use in public buildings where upgrading or retrofitting is planned to take place, especially given the scale of the challenge with 99% of public buildings being heated using fossil fuels (as of 2019).

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

Response

IrBEA would welcome the inclusion of dedicated SSRH case studies for biomass heating systems for public buildings such as schools. Given that the document states that there are between 12500 and 13700 public buildings and over 1000 schools which were as of 2019, 99 % heated by fossil fuels, this represents a huge opportunity for locally produced and managed sustainable biomass based heating systems.

It should also be noted that low carbon construction methods which can include the use of timber frame or engineered timber, which is locally grown, can provides employment opportunities and whose sustainable forest management practices can provide outlets for thinning materials for the provision of carbon neutral heating in form of pellets or woodchip, a discussion point that isn't always given the recognition it deserves from 2 green complimentary disciplines.

With respect to low carbon concrete- biobased additives are being trialled and developed. As noted in the referenced document "low carbon concrete roadmap" biochar is increasingly being utilised as a means to decarbonise construction materials such as concrete and tarmac/asphalt. IrBEA members are actively involved in the development of a biochar sector here in Ireland and it is likely that biobased additives such as biochar will increasingly be used as a means to decarbonise the construction sector.

Training for public procurement- There exists a need to highlight and promote the benefits of bioenergy when considering tendering for upgrade of heating systems or fleet management and there is scope to have this included in any training courses or material that is developed for those responsible for procurement.



The concept of life cycle costing should be used to factor in how a heating system performs over the duration of 15 years (typical length of an SSRH support mechanism) , particularly in the instances where a tender might decided to go down the route of sale of heat only, such as an ESCO contract or similar .Current situations often involves a tender call for a limited length of time such as a duration of 12 month, for supply of a fossil fuel such as gas-perhaps any public procurement of supply of a fuel be done over a longer timeframe. In the event of a tender for fuel, if a supplier can submit a demonstration to show that a longer term tender using a renewable fuel over a longer period can be cost competitive including cost of carbon tax, then the tenderer should be obliged to open up the tender for similar responses and considerations.

Perhaps more could be done through the SEAI energy link- as the body responsible for promotion and delivery of the SSRH- SEAI should do everything in its power to promote this as a suitable scheme for eligible buildings such as schools etc.