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**Subject:** IGBC's submission to Draft Green Public Procurement Strategy and Action Plan Public Consultation  
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[IGBC Master.pdf](#)

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To Whom it may concern,

Please find attached a copy of the IGBC's submission to the Draft Green Public Procurement Strategy and Action Plan Public Consultation.

If you have any questions, please let me know.

Regards

[REDACTED]

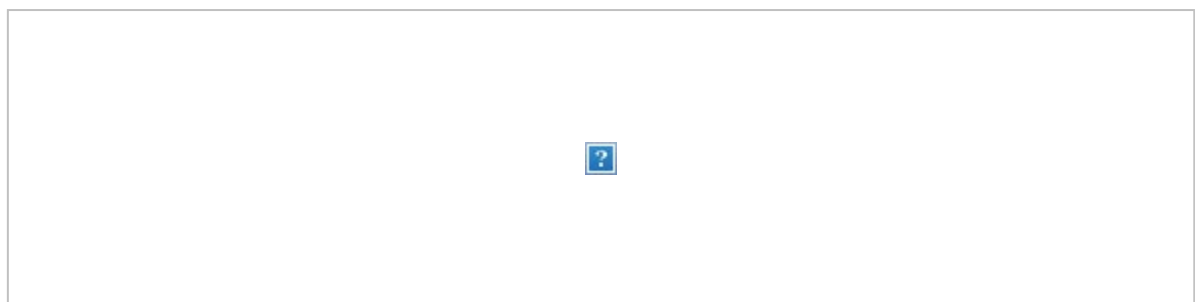
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# IGBC's Submission to Draft Green Public Procurement Strategy and Action Plan Public Consultation

## ABOUT THE IRISH GREEN BUILDING COUNCIL

The Irish Green Building Council (IGBC) provides leadership for a sustainable built environment. IGBC is a registered charity with over [390 corporate members](#) drawn from all parts of the value chain, from occupiers, design professionals, contractors, suppliers, academics and public authorities and affiliated with a global network of 70 national councils within the World Green Building Council. This allows us to create workable solutions and tools to deliver transformative change towards a sustainable built environment.

Since 2018, the IGBC has been involved in several projects to decarbonise Ireland's built environment, including several projects focussing on Green Public Procurement (GPP). These include:

- A large stakeholder engagement process to develop a roadmap to decarbonise our built environment across its whole life cycle. The [Building a Zero Carbon Ireland](#) roadmap includes a number of recommendations on GPP – See pp. 32 and 44.
- Developing training materials and tools to support the use of the Level(s) indicators focusing on Life Cycle Assessment (LCA), Life Cycle Costing (LCC) and Indoor Air Quality (IAQ) as part of public procurement. EU Life funded [Life Level\(s\)](#) project.
- Developing training materials and tools to support the use of the Level(s) indicator on circularity as part of public procurement. EPA funded [Circular Life project](#).
- Developing and piloting energy efficiency training clauses as part of public procurement as part of the H2020 funded [BUSLeague project](#).
- Supporting the piloting of the [CO2 Performance Ladder tool in Ireland](#). The tool has been highly successful in mainstreaming green public procurement in the Netherlands and has already been tested by Transport Infrastructure Ireland (TII) here. It is expected that the use of the tool will be tested by more public bodies over the next eighteen months.

Our work on [Life Level\(s\)](#) and [Circular Life](#) resulted in the [publication of a handbook on circularity, Whole Life Carbon \(WLC\) and LCC in public construction projects](#).

This **submission is based on the findings of these projects and on extensive engagement with our members on this topic through the years.**

## **Q.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?**

The **IGBC welcome the publication of the strategy and the overall approach is good**, but we have **concerns in relation to some of the actions** and believe that **some changes are required to ensure the document fully support an increase in GPP** across the public sector.

E.g., given the Programme for Government's (PfG) commitment to mandate the inclusion of green criteria in all procurements using public funds by 2023, and the importance of the public sector leading by example (as stressed in section 3.4.1), it is **unclear why actions A2, A16, A17 and A18 stresses that GPP should be used "where possible"**. The use of the wording "where possible" is problematic and could lead to GPP not being used. We would encourage the department to delete this part of the sentences (and the reference to it p. 27) or at minimum to consider actions to ensure GPP is use **in all**

**built environment procurement**<sup>1</sup>. Although the decision-making tree p.30 shows that “public bodies that do not include GPP criteria in published tender documentation, must provide justified reasons for not including such criteria in an annual report”, it is unclear how this will be assessed. Including explanation in an annual report is unlikely to be sufficient on its own. Likewise, to ensure the public sector leads by example, the words “where feasible” should be deleted p.34.

**Action A9** - Examine options for coordinating action to help progress GPP implementation in the local authority sector **is needed and welcomed, but the wording should be more specific and ambitious** (“examine options” is weak). Based on our work with local authorities on [energy renovation](#), [circularity](#) and [whole life carbon \(WLC\)](#) in the built environment, coordination is needed on these topics as some local authorities may not have the knowledge/expertise or resources to implement GPP in these fields and lead by example. **This might be done at regional level through the CAROs or Regional Assemblies.**

**The GPP principles listed pp.27-29, and the decision-making tree p.30, are good.** It is positive that the first step is to consider if a purchase is necessary and to re-think how the demand can be met in a way that requires fewer or better value goods to be purchased. This is also fully aligned with concept of “sufficiency” introduced in the proposed revision of the Energy Performance of Buildings Directive (EPBD). In the built environment, re-thinking how the demand can be met in a way that requires fewer or better value goods to be purchased would require a full whole life carbon assessment, hence the importance of using the Level(s) indicator on LCA (see below).

## **Q.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?**

While we understand that the sectors covered by the EPA GPP guidance were chosen on the basis of public sector spend and associated environmental impact, as well as availability and suitability of criteria at EU level, Ireland is in a unique position as we need to deliver a significant amount of social housing in the next decade (with a [potential huge impact on carbon emissions](#)). Consequently, **the development of a similar document focusing on social housing should be a priority and included under action A13.**

While it's positive that the role of Green Building Certifications is mentioned under 7.1.3.1, and given the amount of social housing to be built in the next decade, the **IGBC suggests mentioning the [Home Performance Index \(HPI\) certification scheme \(or equivalent\)](#) under 7.1.3.3 Residential Housing**. MMC have a role to play in decarbonising our built environment, but far more things must be considered. The HPI is Ireland’s national certification for sustainable new residential developments. It was developed by the IGBC with support from the EPA and has over 30 indicators covering topics such as energy efficiency, embodied carbon, post-occupancy evaluation, sustainable location, biodiversity and indoor air quality. Over 20,000 homes are already registered for certification under this scheme. **Using the Home Performance Index indicators at scale would ensure quality, while minimising the environmental impact of new social housing developments.**

Although section 1.3 highlights that GPP can be used as a vehicle for Climate Action, Energy Efficiency and Environmental Protection, most of the actions mentioned in 3.4 only relate to operational carbon emissions (e.g., 3.4.4 on schools). In the built environment, there are real opportunities to truly lead by example and to look at things such as embodied carbon, circularity, and nature-based solutions (NBSs) too. This would also contribute to awareness raising in society and to building capacity in the industry.

In relation to construction materials (7.1.3.2 and 7.1.3.4), one should not forget that the embodied carbon emissions of a building are a function of both the quantity of materials used and their embodied

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<sup>1</sup> Because of the significant impact of the built environment: The Built Environment is responsible for 37% of Ireland national emissions -23% operational/14% embodied carbon emissions, 50% of all raw material extraction, a third of all waste generated and a third of the water usage. A carbon modelling report commissioned from a group of researchers at UCD shows that Ireland cannot reach its climate targets without addressing embodied emissions. [More information here.](#)

carbon. Consequently, **while specifying low carbon building materials is positive, we would encourage the use of Level(s) indicator on Life Cycle Assessment, and the inclusion of targets per sqm as soon as possible and by end of 2025 at the latest.**

Under section 7.1.3.5 Energy Performance of Buildings, we would encourage the Department to look at the proposed revision of the EPBD (and not the 2021 recast) as this is far more ambitious, mentioning Zero Emission Buildings (ZEB) and the introduction of whole life carbon measurements and targets per sqm. Not mentioning this development, nor the Energy Efficiency Directive (EU) 2023/1791 is a real missed opportunity.

In addition, the **IGBC suggests developing high quality guidance documents for GPP to lower the perceived risks associated with it.** These should include guidance to underpin the application of Whole Life Carbon (WLC) within public procurement for all building types and a knowledge bank with case studies and examples of tools that can be used or piloted. These could be **linked to Action A30.**

The strong focus on training is welcome, but the **actions listed under GPP Training and Awareness could be more specific for the built environment.** In particular, a **large-scale training programme in carbon accounting and WLC assessment is needed for public procurers.**

**Q.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?**

In relation to section 7.1.1 – The Built Environment, it would be critical to focus on more than operational emissions. As previously highlighted, the [Built Environment is responsible for 37% of Ireland national emissions -23% operational/14% embodied carbon emissions](#), 50% of all raw material extraction, a third of all waste generated and a third of the water usage. Focusing on more than operational emissions would also be aligned with recent developments at EU level. Both the proposed revision of the EPBD and recitals 55, 56, as well as article 7 – Public Procurement of the recast Energy Efficiency Directive (EU/2023/1791) requires member states to look at more than operational carbon emissions.

The actions relating to the Built Environment (7.1.3.7) appear appropriate and show a sense of urgency. However, given the importance of acting on whole life carbon, and upfront CO<sub>2</sub> emissions, in the next 5 years, and to better support innovation and build capacity within the industry, we suggest mandating the use of the following Level(s) macro-objectives for all procured buildings and renovations (including social housing) in 2024:

- WLC - indicator 1.2
- Design for adaptability and renovation (Level(s) 2.3),
- Design for deconstruction, reuse and recycling (Level(s) 2.4),
- Life Cycle Costing (Level(s) 6.1).

And introducing WLC target limits per sqm from 2025 – see targets below.

**Q.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?**

In relation to the **Built Environment (7.1.3.7)**, the following targets are suggested:

- By the end of 2024, the Level(s) indicator 1.2 – WLC is used for all public notices published for procuring buildings and renovations – including social housing.
- By the end of 2025, limits WLC value per sqm are used for all public notices published for procuring buildings and renovations – including social housing.
- By the end of 2025, start measuring the total percentage of construction materials procured for each project that contained recycled or recovered materials. This will help in developing a strong methodology and baseline.

- By 2027, mandate that at least x% of the total materials used contain recycled or recovered materials. The target currently in use in Italy is 15%, but the previous step would help in developing a realistic and appropriate target for Ireland.

Rational: The suggested T1 target focuses exclusively on waste (not carbon emissions) and does not consider the quantity of materials procured. The alternative indicators suggested above aimed at addressing these issues.

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

Given the Programme for Government (PfG) 2020 “Our Shared Future” sets out that the Government will mandate the inclusion of green criteria in all procurements using public funds by 2023, **an update on the percentage of public contract currently using GPP would be useful** to fully understand the baseline and efforts needed to ensure GPP becomes the new norm. Action A38 is highly welcomed with that regard.

**Adding a deadline for each action would be helpful**, as most of them are urgent given their impact on Ireland’s emissions. E.g., given the level of social housing being built, and their potential impact on both embodied and operational carbon emissions, **action A11 should be prioritised in 2024**.

**Action A7 - DECC to develop guidance on the application of GPP criteria relating to the circular economy and the Whole of Government Circular Economy Strategy**. As mentioned in introduction, the IGBC has [published a handbook on circularity in public construction projects](#) that might be helpful. We are also working on the development of a roadmap for circularity in the construction industry ([Circular Build](#)) and on a circularity demonstrator project - Opera Square project in Limerick as part of [CE-CON](#). IGBC would be delighted to share information on these projects findings with DECC.