

From: [REDACTED]
To: [DECC GPP](#)
Cc: [REDACTED]
Subject: DECC GPP Strategy and Action Plan
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[DECCGreenProcurementConsultation_WISubmission171123\[REDACTED\].pdf](#)

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Department of Environment, Climate and Communications,

Please find attached a submission on the GPP Strategy and Action Plan.

WEEE Ireland is very happy to contribute further and engage with our 1350 electrical and battery industry members for more feedback on this topic for the DECC as appropriate.

Regards

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If you could not join us at our 2023 Conference, click [here](#) for the highlights!



Department of Environment, Climate
and Communications,

Ref.: Feedback to the GPP Strategy and Action Plan

Dear Sir/Madam

WEEE Ireland is a not-for-profit Compliance Scheme limited by guarantee and owned by its members – more than 1360 producers of electrical and electronic equipment (EEE) and batteries. The Scheme has operated under Ministerial approval since 2005.

Last year, we reported 38,107 tonnes of direct Waste Electrical and Electronic Equipment (WEEE) collection, recycled and recovered through our national logistics and treatment operators and downstream specialist facilities, all certified to EN 50625 CENELEC standards as mandated under Irish WEEE Regulations.

Although WEEE Ireland is an Irish company focused on solutions for the national system, it also works in partnership with a strong network of European associations, to provide pan-European compliance to its Members via WEEE Europe and PV Cycle. As a member of EUCOBAT and the WEEE Forum, the Scheme is also adding to the experience and knowledge held by these centres of excellence committed to developing best practice in the Extended Producer Responsibility (EPR) field.

In the context of this consultation, and under our new EPR (Extended Producer Responsibility) mandate, aligned with a Circular Economy vision; WEEE Ireland's Board of Directors and Management team is working on behalf of our Members to achieve a more circular and resource-efficient future, where e-waste generation is decreased through prevention, repair, reuse, and recycling.

Also, ensuring compliance best practice and sustainability is embedded across our Scheme, including procurement, is a priority action for WEEE Ireland. As part of its Ministerial Approval, WEEE Ireland shall adopt policies that are committed to environmental best practice in the procurement of goods and services and introduce measures to promote green procurement within the scheme as an entity and within its supply chain so that the environmental impacts of its products and services are minimised where practicable.

On such terms, we welcome the DECC consultation on the Green Procurement Strategy and Action Plan 2023-2027 Draft, that will allow us to share insights and experiences on behalf of our 1300 members.

WEEE Ireland

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This document was prepared taking into consideration the questions published by the DECC at [1e7e7ac3-a078-444a-9196-063b77331f71.pdf \(www.gov.ie\)](https://www.gov.ie/public/attachments/gov.ie/attachment/data-store/attachment-data-store-1e7e7ac3-a078-444a-9196-063b77331f71) and consist in the following:

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?

Yes, as the plan tries to achieve the overall target that all public bodies include the GPP criteria in all tender activities and outlines a series of principles 3 that public bodies must consider when assessing the need of purchasing goods.

It tries to avoid unnecessary purchases and inserts the idea of reuse and recycling of existing products and systems. Also, it mandates the application of a Green Public Criteria in the tender documentation, and strengthens the idea of using the EPA GPP Guidance, EU GPP criteria, and a 'minimum environmental criterion' when no suitable EPA or EU criteria is available.

Notwithstanding the above, taking into consideration that the "Needs assessment" relies mostly on the EPA GPP criteria, such guidance only refers to ICT, lighting and heating equipment, and excludes all other categories of EEE products, e.g., medical equipment that is used by hospitals, small appliances used throughout public buildings - kettles, toasters, microwaves, larger catering and refrigeration equipment etc. Batteries for energy storage, UPS, mobility devices, and more, should all also be included. The national category listing could be referred to for this purpose.¹

Likewise, related to the ICT and lighting sector described in the EPA criteria, the guidance focuses -in general- on waste recovery and repairability, but not in the authorised environmental supply of goods on to the Irish market. **In other words, no criteria specifies that EEE or Batteries provided was placed on the market by an authorised Producers or distributor registered with the Producer Register Ltd which is a legal requirement under the Irish WEEE and Batteries Regulations. This is a simple compliance check – Request a copy of the Producer Registration Certificate and Producer Register Number on all public procurement practices that involved any type of electrical equipment or batteries.**²

¹ <https://www.producerregister.ie/news/the-producer-register-category-listings-6.1>

² [Producers | Producer Register](#)



Moreover, with the new European Battery Regulations³ now in place, the EPA criteria must be updated and include the latest sustainability requirements for the EEE with integrated batteries that are supplied.

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?

Yes, taking into consideration that the next Circular Economy Strategy that is to be due to be published in 2023/2024 will include sectoral targets in relation to “electronic equipment”, the current GPP Strategy and Action Plan should include a wider range of EEE products (including those with integrated batteries), and batteries, and not only those indicated in the EPA and EU Criteria (e.g., medical devices, small equipment).

The above should be taken into consideration due to the fact both, the New Battery Regulations and the ESPR proposal, are establishing new obligations for a wider range of products.

For Example, Article 85 of the New Battery Regulations, establishes that award criteria for all kinds of batteries (and/or EEE products with integrated batteries) will have to be included in procurement procedures.

Likewise, the strategy should take into consideration the ESPR proposal Regulation, due to the fact that it also concerns green public procurement and more specifically the possibility to establish - by the adoption of delegated acts - requirements applicable to public contracts (e.g. technical specifications, selection criteria, award criteria, etc.), based on the product parameters of durability, reliability, repair, reuse, quality of recycling, environmental footprint, among others (e.g. the “Minimum Environmental Criteria for Public Procurement of Goods and Services” set in the GPP Strategy should contemplate those parameters within the menu of options in setting green criteria).

Moreover, it should be taken into consideration that the ESPR has as one of its main objectives the creation of a digital product passport –among other purposes- for the setting of mandatory green public procurement criteria on all kind of products (except food).

³ [Regulation \(EU\) 2023/ of the European Parliament and of the Council of 12 July 2023 concerning batteries and waste batteries, amending Directive 2008/98/EC and Regulation \(EU\) 2019/1020 and repealing Directive 2006/66/EC \(europa.eu\)](#)



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?

No but we welcome certainty for our members and businesses involved in the supply of electrical and batteries to public bodies with information, training and supports available to enable a transition toward GPP supply and one which incentivises positive and sustainable change in a fair and equitable manner. This may include support for new standards to be achieved within a specified timeframe following an award for SME's and microenterprises, as just one example.

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?

NA

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

As it can be seen from the document, the Action Plan "all public bodies –have- to include GPP criteria in all tender documents, where possible"; nonetheless, additionally to the above and as we highlighted to the EPA during the GPP criteria consultation:

- The EPA criteria should ensure WEEE taken back for recycling and recovery is treated to the mandated CENELEC standard EN 50625, and similarly preparation for reuse activity undertaken only by registered organisations certified to CENELEC standard EN 50614. There are only five organisations (6 facilities) in Ireland certified to EN 50625, and an updated list of all European recycling facilities can be found on the WEEELABEX register.⁴
- Specific to the Lighting Sector. It is important to highlight the importance of specifiers, especially in the public procurement sector, to reference the TM66 guidance concerning lighting specification and installation. Therefore, the EPA should consider incorporating such guidance when updating the GPP and as

⁴ [WEEELABEX ORGANISATION - Weelabex](#)





previously referenced ensure all lighting suppliers are Producer Registered in the Irish market-place.

The TM66 provides practical guidance for specifiers (designers, consultants, architects, manufacturers, importers, suppliers, wholesalers, contractors, etc.) to all products in the lighting industry for achieving and complying with the circular economy principles.

Contact details for further engagement:

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Should you have any queries, please let us know.

Kind regards

WEEE Ireland Team