

**From:** [REDACTED]  
**To:** [DECC GPP](#)  
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[CIWM Ireland Cover Letter Public Consultation on the Draft Green Public Procurement Strategy and Action Plan - Nov 2023.pdf](#)  
[CIWM Republic of Ireland FINAL response Green Public Procurement Nov 2023.pdf](#)

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Dear Green Public Procurement team

Please find attached the response from CIWM Ireland to the **Public Consultation on the Draft Green Public Procurement Strategy and Action Plan**

If there are any questions do not hesitate to contact us.



[www.ciwm.co.uk](http://www.ciwm.co.uk)

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Together, we stand for  
a world beyond waste

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To Whom it May Concern:

On behalf of the Chartered Institution of Wastes Management (CIWM), Republic of Ireland Centre, I attach herewith our submission in response to the Public Consultation on the Draft Green Public Procurement Strategy and Action Plan.

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CIWM Ireland acknowledges that this submission is subject to the provisions of the Freedom of Information Act 2014 and access to information on the Environment Regulations 2007-2014.

We welcome the opportunity for continued stakeholder engagement and active involvement in any committees and task and finish groups, both now and for the long-term future.

Kind Regards,

[REDACTED]

[REDACTED], FCIWM PhD., MSc.

Honorary Centre Chairperson

CIWM Representative of Ireland Centre



CIWM is the leading professional body for the resource and waste management sector with a purpose to move the world beyond waste. Representing over 6,000 individuals in the UK, Ireland and overseas, CIWM has a mission to unite, equip and mobilise its professional community to lead, influence and deliver the science, strategies, businesses and policies for the sustainable management of resources and waste.

CIWM is recognised as the foremost professional body representing the complete spectrum of the waste and resources sector. This gives the Institution the widest possible view and, perhaps more pertinently, an objective rather than partial view, given that our goal is for improvement in the management of all wastes and resources.

CIWM Ireland is one of ten CIWM Centres. CIWM Ireland represents most sectors of the waste management industry in Ireland such as academia, consultancy, EPA, local authority, construction, waste collectors, producer responsibility and social enterprise.

## **Draft Green Public Procurement Strategy and Action Plan Public Consultation**

*Question 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: No

The Green Public Procurement (GPP) strategy and action plan is not ambitious enough to drive a “significant” increase in GPP.

With public bodies (excluding utilities) spending ~€18.5 billion a year on goods, GPP presents a very significant opportunity for promoting the green and in particular, circular economy, as highlighted in the draft strategy. However, the EPA’s GPP Monitoring and Reporting study in 2021 demonstrated that progress has been, if anything, regressive<sup>1</sup> in terms of the uptake of GPP in public contracts, despite the development of guidelines, training, case studies and more.

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<sup>1</sup> The report found that public spend actually decreased on contracts including green criteria over €25,000 in 2021 compared with 2020



The GPP strategy and action plan should be strengthened through introducing numerical targets, and fully availing of the tools and opportunities that GPP presents, such as those highlighted in reports such as the Circular Procurement Transformation Guidance from the ProCirc Interreg project<sup>2</sup> and BUYING SOCIAL AND GREEN FROM SOCIAL ENTERPRISES - RREUSE Updated Position paper on the Public Procurement Directive 2014/24 from the RREUSE network<sup>3</sup>.

The strategy should, at minimum, underpin actions with a policy commitment in line with national targets, including:

- the Waste Action Plan for a Circular Economy commitment to a minimum target for procurement of used goods.
- the National Waste Management Plan for a Circular Economy anticipated national reuse and future repair targets as well as reuse targets for Civic Amenity Sites.

Furthermore, reflecting the relatively small scale of local circular economy goods and services suppliers, there are significant opportunities for procurement at the <€50,000 threshold levels. Supporting procurement at this scale would:

- facilitate and grow the supply of circular goods and services
- reduce risk to contracting authorities by providing opportunities to engage on smaller projects
- generate interest and highlight the wide range of opportunities for GPP at this scale across organisations.

It is important that this new GPP strategy and action plan both recognize and support activity at a smaller scale to foster growth of GPP and also growth of the sector as a whole. Acknowledging a balanced approach to supporting SMEs, micro-enterprises, as well as social enterprises that can bring additional benefits to procurement to achieve targets in a reasonable timeframe. Alongside funding and or training support to achieve the standards required for conformity, compliance and good practice.

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<sup>2</sup> Download from [https://northsearegion.eu/media/22600/procirc\\_cpt-guidance\\_web.pdf](https://northsearegion.eu/media/22600/procirc_cpt-guidance_web.pdf)

<sup>3</sup> Download from <https://rreuse.org/wp-content/uploads/2023/04/rreuse-position-paper-on-public-procurement.pdf>



*Question 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: Yes

As the market is still relatively small and emerging in circular goods and services, the strategy should focus more on market engagement and building relationships with suppliers to facilitate realistic solutions that are readily available, foster competition, innovation and growth and identify risks and issues involved. The Circular Procurement Transformation Guidance from the ProCirc Interreg project<sup>4</sup> provides guidance for market engagement.

This should include continued support for important tools such as the CRNI virtual trade fair<sup>5</sup>. The trade fair showcases and raises awareness about circular and social economy suppliers servicing tenders <€50,000 as well the very broad range of goods and services available. It is currently funded by the Regional Waste Management Plan Lead Authorities.

Considering of the use of standards for waste procurement, so for WEEE management – EN 60625 and preparation for reuse and reuse organisations – EN 50614.

Learning from others, such as France introducing a lower VAT threshold on refurbishment services, perhaps having zero rated items that are refurbished.

*Question 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:

### **Built Environment**

Reuse is higher in the waste hierarchy than recycling, due to its larger impact on reducing GHG emissions. However, deconstruction for reuse can be more labour intensive and more

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<sup>4</sup> Download [https://northsearegion.eu/media/22600/procirc\\_cpt-guidance\\_web.pdf](https://northsearegion.eu/media/22600/procirc_cpt-guidance_web.pdf)

<sup>5</sup> Greenandsocial.virtualeventspace.io



costly than recycling and therefore, a joint target would most likely be largely met by recycling.

The target for reused or recycled materials for construction should be separate. The target for reused products should be at minimum in line with national reuse targets.

### **Food Procurement and Action to Prevent Food Waste**

The GPP strategy approach to food waste prevention should align with Ireland's commitment to reducing food waste by 50% by 2030.

Sectoral Target 3 should go further than the current requirement for 100% of new contract arrangements to "include measures that are targeted at addressing food waste" with concrete numerical targets e.g. based on the same baseline, a 50% reduction should be achieved by 2030.

### **Textiles**

While recycled content is important, it is essential that the GPP strategy addresses the very high level of overconsumption of textiles in Ireland.

This could involve setting targets to reduce spend on new textiles, and / or a commitment to procurement of reused or upcycled textiles in line with national reuse targets.

Another important consideration is the management of used textiles. There are many policy developments currently underway related to post consumer textiles including separate collection obligations and EPR requirements. GPP should at minimum align with these changes and ensure that used textiles arising in the public sector are separated for reuse as a priority.

*Question 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:



Ireland is one of the few Member States that does not have any policy or strategy promoting social procurement. Across other Member States, there are a growing number of excellent case studies of supporting the social economy in reuse and repair<sup>6</sup>.

Measures should be taken in the GPP strategy to support social actors in the circular economy through measures such as reserved contracts, encouraging consortium approaches (which also empowers smaller actors, see above) or best price-quality ratio where social and environmental considerations are included.

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<sup>6</sup> See <https://rreuse.org/wp-content/uploads/2023/04/rreuse-position-paper-on-public-procurement.pdf>

