

From: [Green Spaces For Health](#)
To: [DECC GPP](#)
Subject: Green Procurement Paper Submission
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Attachments: [Green Procurement Policy Cork Healthy Cities.pdf](#)

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To Whom it concerns,

I am submitting this on behalf of my colleague [REDACTED] of Cork Healthy Cities.
Please issue a receipt of acknowledgement that you received it.

Thank you

[REDACTED]
Coordinator Green Spaces for Health

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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

Green procurement is an essential vehicle to drive action to reduce biodiversity loss and the negative impacts of climate change.

Cork Healthy Cities supports reference to the development of a 'Sustainable Public Procurement' policy that incorporates actions for environmental, economic and social impact. The broader impact of sustainability and the social impacts are an area in great need of exploration and investment and we advocate for this to be developed imminently.

The approach proposed in this draft document is quite comprehensive and it is the assertion of our members that it will only significantly increase green procurement across the public sector only if the following is in place:

- monitoring, enforcement and regulation of the policy objectives in all public services
- training and capacity building to implement green procurement decisions needs to be mandatory for procurement officers – EPA GPP Training
- stringent and assistive guidelines for green procurement (copy of which to be enclosed with the policy document)
- additional financial resources for resource depleted services to incentivise green procurement decisions over cost saving measures
- promotion of locally sourced goods and services to reduce transport and carbon footprint
- requirement of carbon budgets for public service staff activity

The regulation set out on page 55 of the draft document requires more detail, with reporting by public agencies specifically on the procurement scoring system adopted by each public sector body to include the key areas of:

- construction,
- energy,
- transport,
- food and catering services,
- cleaning products and services,
- paper,
- uniforms and other textiles, and
- ICT

P.42 reword as follows:

The EPA 's GPP Guidance Criteria for Food and Catering Services includes a GPP approach that focuses on, for example, **where feasible locally sourced** sustainable and organic food production methods, reduced energy and waste consumption in kitchens, reduced impact of food transport, packaging and storage, and food waste prevention as part of public procurement of food and catering services requires. To add value to the Criteria for Food & Catering Services, specific reference to 'where possible sourcing locally grown' organic food in support of local economies and reduced food mileage.

The inclusion of a copy of EPA Guidance Criteria would be an welcome addition to this policy

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

Reference within the policy to funding and staffing from government for the implementation of the policy would be welcome.

Reference to a percentage allocation of public service budgets ring fenced for implementation would we welcome. We advocate for the inclusion of 1% budget allocation publicly funded capital, infrastructural and building development can be allocated to **biodiversity development** equivalent to as set out by precedent in the 'Per Cent for the Arts' initiative of government.

Public works delivered by private entities should be included and this guidance should be extended to the private body delivering on behalf of the public service

Monitoring and enforcement of biodiversity requirements is essential

Evidence of compliance with the guidelines needs to be measured

In terms of procurement for events and meetings funded by public funding should be included in this policy document

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

The ambition and targets need to match the commitment to carbon neutrality in the EU by 2050. We strongly advocate for a highly ambitious policy supported by a framework for implementation with targets set out across the public sector for action.

We advocate for the requirement of green procurement to be embedded within all public policy development.

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

Sourcing of locally grown organic food for catering services to support diversification from import driven dependency on the food system and the diversification of agriculture beyond dairy in Ireland

p.41 Action 7.1.4.Focus on food provision at events hosted by the service as well as food provision in house

p. 48 Action7.2.1 – broaden social enterprise actions to include procurement of services from social enterprises that prioritise the circular economy and green services

Pg 41 – reference 57 - Link to organic food policy is a link to a press release and not the policy itself – a link to the policy would be more helpful

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

Health is a prerequisite of sustainable development. Basic human rights are being threatened by anthropogenic climate change. Climate change is now the greatest societal challenge of our time. Research has shown that the global cost for investing in climate change mitigation strategies in line with the Paris Agreement would be comfortably offset by the savings in healthcare costs associated **with air pollution-related disease alone** (Markandya et al. 2018)
[https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196\(18\)30029-9/fulltext](https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196(18)30029-9/fulltext)

We believe that a strong and ambitious national Green Procurement Policy requires investment and needs to be regulated and enforced. The strength of any national policy cannot be measured in the words compiled in the document but in the actions that emerge from the commitment, so enforcement and regulation of the policy is essential.