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Please see attached submission from DAFM to the above consultation. If need to discuss further please contact me.

Regards

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An Roinn Talmhaíochta, Bia agus Mara

Tá an t-eolas sa ríomhphost seo, agus in aon cheangaltáin leis, faoi rún agus tá sé dírithe ar an bhfaighteoir/na faighteoirí beartaithe amháin agus níor cheart ach dóibh siúd é a úsáid. D'fhéadfadh an t-eolas seo a bheith faoi réir pribhléid dhlíthiúil agus ghairmiúil. Mura tusa faighteoir beartaithe an ríomhphoist seo, níor cheart duit an teachtaireacht seo, nó aon chuid di, a úsáid, a nochtadh, a chóipeáil, a dháileadh nó a choinneáil. Má fuair tú an ríomhphost seo go hearráideach, cuir an seoltóir ar an eolas láithreach agus scríos gach cóip den ríomhphost seo ó chóra(i)s do ríomhaire, le do thoil.

Buying Greener - Draft Green Public Procurement Strategy and Action Plan 2023-2027- Draft for Public Consultation

Department of Agriculture, Food and the Marine Feedback

Section 3.4.5: In the actions detailed in Schools, future construction projects that contain low embodied carbon could be listed as an action. The GPP criteria could list suitable building methods/materials that would reduce the overall carbon emissions of new constructions. These should include the use of timber and engineered wood products.

Section 4.3: The Department of Agriculture, Food and the Marine are currently a co-funder on the Facilitating a Green and Circular Economy 2021 Call Topic 9 project of Opportunities for Green Public Procurement to improve implementation of circular practice (Opps4GPP). This project is currently underway and investigating Life cycle assessment, Low-carbon construction and Innovation systems for GPP. Along with providing national guidance to GPP criteria, it will also assess the environmental impacts of GPP, including material substitution effects and the impacts of design for disassembly and reuse. Another project funded under the same research call is the Identification of Effective State-of-the-Art Green Public Procurement Policy and Practice for the Irish Public Sector. This project aims to decarbonise the public sector by providing national and international GPP best policy and practice. A GPP toolkit will be developed that optimises procurers decision making through providing case studies, recommendations, lists of templates, products and services by purchase theme. These projects could provide guidance and recommendations on green criteria in public procurement as well as information pertinent to Irish GPP criteria in the near future.

Section 5 & 6: In terms of the tendering process and the selection criteria for GPP products, often the cost of a material or service can be weighted equally or higher in comparison to the green credentials. For the selection and award criteria, an appropriate value should be placed on the GPP material or service as an alternative to a high embodied carbon alternative. Although this may not always be appropriate where cost differentials occur, it should be listed as a consideration/ criterion in the selection process of awarding a contract.

The Public Spending code¹ provides a set of rules and procedures that ensure that standards are upheld across the Irish public service. In March 2023, changes were made to the capital appraisal guidelines aimed at enhancing delivery of the NDP. In Circular 06/2023 the Public Spending Code now includes increased thresholds for major projects and the requirements for major projects at different stages in the project lifecycle. Under the new circular it is mandatory for all economic appraisals to value emissions from the “basket of seven” greenhouse gases. These emissions are then to be valued according to the estimated abatement cost that Ireland will face to reach binding climate targets. Where it is deemed that there are no greenhouse gas emissions associated with an investment, the appraisal must include a statement setting out how this conclusion was reached. The Public Spending Code also include some supplementary Guidance in Measuring & Valuing Changes in Greenhouse Gas Emissions in Economic Appraisal² and this is supported by the report Valuing Greenhouse Gas Emissions in the Public Spending Code³. These provide information in relation to monetising greenhouse gas emissions using a shadow price of carbon. This is particularly relevant to GPP in the role of forests and timber in the carbon cycle and the substitution effects over higher embodied carbon materials. The inclusion of Life cycle analysis (Section 8.5) provides the opportunity to carry out an economic analysis that considers economic costs and benefits, the net benefit for society and allows

¹ <https://www.gov.ie/en/publication/public-spending-code/>

² <https://assets.gov.ie/45078/b7dbf515ad694c3e8b2c37f1094b7dca.pdf>

³ <https://assets.gov.ie/19749/77936e6f1cb144d68c1553c3f9ddb197.pdf>

for parameters such as the shadow prices of carbon, public funds, labour, and an economic discount rate to be considered.

Section 7: For the built environment, buildings utilising wood provide opportunities to reduce the GHG emissions from the construction of buildings. As well as improving the energy efficiency of public buildings by using GPP criteria, these can also be applied to the selection of the materials used in the initial construction through the substitution effects of timber instead of concrete or steel. This is also a key target in the Climate action plan 2023 under the following actions:

- Research and Innovation
 - RE/23/5 Support national LULUCF commitments
- Public Sector Leading by Example
 - PS/23/9 Provision of climate-related training and upskilling
 - PS/23/12 Support implementation of GPP in the public sector
- Industry
 - EN/23/9 Publish a report on actions to decrease embodied carbon in the whole life-cycle of construction materials
 - EN/23/10 Identify case study which highlights suitability and opportunities for alternative construction materials
 - EN/23/12 Specify low carbon construction methods and low carbon cement material as far as practicable for directly procured or supported construction projects from 2023
- Built Environment
 - BE/23/35 Construct two exemplar public sector buildings using alternative construction techniques and materials, and monitor performance

Section 7.1.2: This section should also include targets to meet climate action plan 2023 action EN/23/12- Specify low carbon construction methods and low carbon cement material as far as practicable for directly procured or supported construction projects from 2023. The utilisation of timber in construction as an alternative to high embodied carbon materials such as steel or concrete should be considered here.

Section 7.1.3.2: The specification for timber requiring evidence that the products are sourced in compliance with EU Timber regulations provides assurances of combating global trade in illegal timber or timber products. The Regulation on deforestation-free products⁴ repeals the EU Timber Regulation since June 2023 by promoting the consumption of 'deforestation-free' products and reducing the EU's impact on global deforestation and forest degradation. This also supports reducing greenhouse gas emissions and biodiversity loss.

Section 7.1.3.4: This section outlining the role and contribution of cement in the construction sector could include a reference to alternative construction materials that include timber.

Section 7.1.3.7: An action should be included here that references the increased use of timber, particularly in terms of its use in future construction products that contains low embodied carbon.

Section 7.1.3 should include a paragraph on the Interdepartmental and Industry Timber in Construction Steering group. This group was recently formed from Government Departments, Public Bodies and Industry Representative Bodies aims to develop a forum with Government and Industry to work collaboratively:

1. To create the conditions to increase the use of timber in construction whilst ensuring the highest degree of building safety and property protection;
2. To examine regulatory and standardisation standards challenges; and
3. To maximise the use of home-grown timber in construction.

⁴ https://environment.ec.europa.eu/topics/forests/deforestation/regulation-deforestation-free-products_en

With a view to decarbonising and reducing the carbon intensity of materials in buildings, change will be required in Ireland's construction sector and this group can lay the groundwork for future building environments. Five thematic areas have been identified which include:

- Theme 1: Market opportunity
- Theme 2: Regulation, Standards and Compliance
- Theme 3: Public Procurement and Demonstration Projects
- Theme 4: Research and Development
- Theme 5: Communication, Education, Training and Public Awareness

Within Theme 3 and Theme 4, the group has the opportunity to utilise GPP Criteria in the construction of demonstration exemplar public sector buildings and investigate the calculation methodology for the Whole Life Carbon (WLC) of timber in the built environment.

Section 7.1.7: This section could also reference to the Regulation on deforestation-free products that is outlined above.

Overall: The report "Forests and wood products, and their importance in climate change mitigation" published by the Council for Forest Research and Development (COFORD) recommends that Central government and local authorities should promote the use of a wood first policy and should introduce whole life carbon reporting throughout the construction sector. To promote the use of wood in construction, many national and local authorities have introduced 'Wood First' policies. In British Columbia⁵, the Wood First Act was introduced which requires provincially funded projects to use wood as the primary construction material. In Switzerland⁶, the Swiss Wood Resource Policy instituted targets for using wood to reduced embodied energy and carbon in buildings. In Paris⁷, buildings taller than eight stories being built for the 2024 Paris Olympics must be of timber construction, and all public buildings in France will be required to be made of at least 50% timber or other sustainable materials from 2022. The Borough of Hackney⁸ in London introduced a 'Timber First' policy in 2012 and now has at least 18 multi-storey timber buildings. Similar policies have been put in place by regional authorities in Australia, New Zealand, and Sweden. All of these have resulted in a significant increase in the use of timber in construction. In Ireland, South Dublin County Council (SDCC) has recently adopted a 'Wood First' Policy, requiring the use of wood as the primary building material where practical in all new and modified SDCC funded buildings.

Timber can play a significant role in Green Public Procurement by promoting a number of initiatives:

- **Sustainably managed forests:** Voluntary timber certification standards such as FSC (Forest Stewardship Council) and PEFC (Programme for the Endorsement of Forest Certification) can provide verification of the sustainability of a timber source. The Regulation on deforestation-free products also provides EU rules to guarantee that the products EU citizens consume do not contribute to deforestation or forest degradation worldwide.
- **Carbon Sequestration:** Timber products used in construction can store carbon for long periods of time. Timber buildings and timber components used in construction act as carbon sinks, helping to reduce the carbon footprint associated with the manufacture and use of non-renewable, high embodied carbon materials such as concrete or steel.

⁵ Government of British Columbia, 2020, https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/00_09018_01

⁶ Federal Office of the Environment, 2017, Wood Resource Policy - Strategy, Objectives and Wood Action Plan, Swiss Confederation, Bern, Switzerland.

⁷ Global Construction Review, 2020, New French public buildings must be made 50% from wood.

<https://www.globalconstructionreview.com/news/new-french-public-buildings-must-be-made-50-wood/>

⁸ Hurst, W., 2013, Hackney moots 'timber-first' planning policy, Building: <https://www.building.co.uk/news/hackney-moots-timber-first-planning-policy/5036737.article>

- **Low Embodied Energy:** Timber construction materials can contribute to energy-efficient building designs which result improved thermal performance and insulation performance. For timber frame buildings this can result in a reduction in the required energy for heating or cooling these buildings.
- **Circular Economy:** Timber can be reusable and recycled after its initial intended use which supports the principles of a circular economy. Through GPP criteria, proper design and construction of timber buildings could allow a secondary use for this timber after the life-span of the building.
- **Bio-based materials:** Engineered wood products such as glulam (Glue Laminated timber) or CLT (Cross laminated timber), can be used as GPP products that are suitable alternatives to high embodied carbon concrete or steel. These products offer potential as strong, durable and sustainable which can contribute to reducing the overall environmental impact of public sector construction projects and across the building industry.