

**From:** [REDACTED]  
**To:** [DECC.GPP](#)  
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**Subject:** GPP Draft Strategy and Action Plan - RIAI response  
**Date:** Thursday 9 November 2023 23:53:03  
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To whom it may concern,

On behalf of the RIAI, please find attached our response to the Draft Green Public Procurement Strategy and Action Plan.

Should you have any questions on the enclosed, please don't hesitate to contact myself or Practice Director, [REDACTED] (copied above).

Best wishes,

[REDACTED]  
Climate Change Advisor



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**RIAI** – The Registration Body for Architects in Ireland  
Promoting the Value of Architecture | Supporting Sustainable Careers | Protecting the Consumer

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The Directors of the Company for 2023 are: [REDACTED].

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**Circular Economy – Strategic Policy Division**

Department of the Environment, Climate and Communications  
Newtown Road  
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Y35 AP90

10 November 2023

**Subject: RIAI feedback on Draft Green Public Procurement Strategy and Action Plan**

To whom it may concern,

The Royal Institute of the Architects of Ireland (RIAI) welcomes the opportunity to provide feedback on the draft Green Public Procurement Strategy and Action Plan.

The following are responses to the five questions posed:

- 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:**

The RIAI welcomes the introduction of a harmonised and clear set of targets across Public Sector procurement. We would hope that this strategy will see multiple efficiencies and positive environmental benefits across the various sectors. For any action plan to be successful there will need to be regular and transparent reporting to ensure that the projected targets are being met and adjustments made as necessary. Initially, project cost estimates may be impacted, and cost adjustments should be facilitated within the public spending code.

There are reports of human resource deficits in skills across the industry, and the strategy should allow for skills deficiency (architects at senior level) to be addressed through budget and resource planning to ensure that government's ambitions are being implemented with the required skillsets in the most effective manner.

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**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:**

Due to the long gestation times of building projects, and the urgency and scale of climate action required, embedding clear targets in the initial stages of a projects' development is crucial. This includes going beyond the minimum building compliance targets and setting building performance targets (in-use targets) at the preliminary brief stage. The RIAI recommends that all projects in the Built Environment work towards the targets of the RIAI 2030 Climate Challenge. <https://www.riai.ie/discover-architecture/climate-change>.

There would be multiple benefits to a Client by incorporating building performance targets at the start of a project. Refer to the RIAI 2030 Climate Challenge - Client Guides (published October 2023) for more information.

**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:**

Under Appendix I, there are no specific targets or implementation dates for actions A20, A21 and A22. It is recommended that there should be reference/inclusion of specific GHG emission targets under the Built Environment.

There are also no timeframes noted under Appendix II Action T1 for procuring recycled/reused content in the Built Environment. For clarity, there should be definitive targets noted for all sectoral targets, so that industry may adapt, prepare and respond accordingly with their own supply chains.

**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:**



The RIAI recommends that under the Built Environment sector, building performance targets in relation to Operational Energy (in-use), Embodied Carbon (Whole Life Carbon), Water use (in-use), Health and Wellbeing (in-use) targets should be included in any public tender and embedded as part of the preliminary project brief.

Refer RIAI 2030 Climate Challenge for recommended targets.

<https://www.riai.ie/discover-architecture/climate-change>.

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

#### **Response:**


The RIAI recommends a stepped transition to tighter targets and implementation dates for projects that fall below the national threshold for Works within built environment (currently Eur 5.382m) as this could cover a considerable number of retrofit projects.

We also recommend that any reference in this document to the targets of the RIAI 2030 Climate Challenge refers to the enhanced 2030 targets (instead of the 2025 targets) due to the long gestation time of projects and the proximity to years to 2025.

It is recommended that there is a strong focus on quality, enabled through efficient, effective procurement processes, supported by appropriate resources and the essential need to have experienced, skilled resources (including architects) in place to assess the quality.

Should you have any queries in relation to the above or should you require any further information, please do not hesitate to contact the undersigned.

Yours sincerely,

  
RIAI Practice Director

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