

From: [REDACTED]
To: [DECC GPP](#)
Subject: Comments on Draft Green Public Procurement Strategy and Action plan 2023-2027
Date: Friday 17 November 2023 16:08:16
Attachments: [TII GPP Response cover letter.pdf](#)
[TII_GPP_Public_Consultation_Response_.pdf](#)

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Please find attached comments from TII on the Draft Green Public Procurement Strategy and Action plan 2023-2027 [gov.ie](http://www.gov.ie) - [Public Consultation on the Draft Green Public Procurement Strategy and Action Plan \(www.gov.ie\)](#)

Regards,

[REDACTED]

Engineer,
Research and Standards,
TII Transport Infrastructure Ireland
email: [REDACTED]
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[TRA: Transport Research Arena | Dublin 2024 | Transport Transitions: Advancing Sustainable and Inclusive Mobility \(traconference.eu\)](#)



Please note that I am out of office every alternate Friday and will respond to your email upon my return

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Circular Economy – Strategic Policy Division
Department of the Environment, Climate and Communications
Newtown Road
Wexford
Y35 AP90

17 November 2023

Re: Draft Green Public Procurement Strategy and Action Plan – Public consultation

Dear Sir/ Madam,

We are writing to you in response to the public consultation on the draft Green Public Procurement Strategy and Action Plan launched on 29 September 2023.

Please find our responses, prepared in relation to the consultation questions provided, appended to this letter.

Yours sincerely,



Circular Economy Lead, TII

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Draft Green Public Procurement Strategy and Action Plan

Public Consultation Questions

Responses

Number	Question
1	<p>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?</p>
Response	<p>The mandatory requirement of Section 2.6 (Action A6) would focus relevant sections and organisations to install robust processes:</p> <p><i>“All public bodies with an annual public procurement spend (on average over the previous three years) above €200m to secure ISO 20400:2017 accreditation by the end of 2025.”</i></p> <p>It is also noted that it appears that the Office of Government Procurement (OGP) eForms (digital public procurement notices) - Reporting on sustainable considerations, will be in a position to support data capture in relation to Action A33:</p> <p><i>“OGP to investigate potential of using data on GPP captured by procurement notices (eForms) published on eTenders and Tenders Electronic Daily to monitor GPP in different categories, across the public sector, with a view to reporting on such data from 2025.”</i></p> <p>Within Section 1.3 it is stated that <i>“GPP is also about influencing the supplier market”</i>. Caution is advised in this regard, particularly in the absence of clearly defined SMART criteria, that procurement bodies don't introduce <i>“barriers to trade”</i>. An example of supply chain engagement which has been effective in reducing barriers to trade in the pavement industry is given in response to question 2, however SMART criteria is still lacking as the data collection is in its infancy in many areas of the construction sector for infrastructure and specific materials.</p> <p>Within Section 1.4 it is stated that <i>“Government Circular 20/2019 instructs Government Departments to consider including green criteria in public procurement processes in circumstances where clearly defined, quantifiable, verifiable and measurable criteria have been developed and are relevant to the specific procurement process”</i>.</p>

Number	Question
	<p>Currently the absence of "SMART" criteria particularly in the case of materials is a concern. The lack of Government Department oversight, in addition to the lack of resources within the organisations which can verify materials environmental criteria, is a concern.</p>
2	<p>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?</p>
Response	<p>It would be beneficial if it was set out, within the introduction section, where this document ranks in terms of the five strands of the National Public Procurement Policy Framework:</p> <ul style="list-style-type: none"> • Legislation (Directives, Regulations). • Government Policy (Circulars). • Capital Works Management Framework (CWMF) for public works. • General Procurement Guidelines for Goods and Services. • More detailed technical guidelines, template documentation and information notes as issued periodically by the Policy Unit of the Office of Government Procurement (OGP). <p>Greater linkage to the existing strands would make it clear in users' minds what is mandatory and what is not. This will assist in enforcing and bringing about change in this regard.</p> <p>A number of parties (Dept, OGP, EPA, etc.) are publishing material on a national level on procurement, in addition to the EU. It is suggested that joining this up in one location would be beneficial, for example, on one central portal or platform site, to consolidate a focussed approach. This would give users comfort that publications are aligned across all government bodies.</p> <p>In relation to supply chain engagement and green procurement, an example is Transport Infrastructure Ireland's work with the road materials supply chain to embed environmental measurement into procurement. This will be achieved through development of complementary Product Category Rules (cPCRs) for Environmental Product Declarations (EPDs). Development of cPCRs has involved extensive industry consultation. TII is currently finalising cPCRs to facilitate the production of EPDs for Asphalt Concrete materials and expects to publish this Standard in 2023. Following publication of the cPCRs for EPDs, TII Publication CC-SPW-00900 Specification for Roadworks – Series 900 Road</p>

Number	Question
	<p>Pavements - Bituminous Materials will be revised to make bituminous materials product specific EPDs a requirement for works on National Roads. It is expected that the industry will require up to a 6-to-12-month lead in time to deliver the EPDs. This will be followed by the development of cPCRs to facilitate the production of EPDs for other materials used in road construction.</p>
3	<p>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?</p>
Response	<p>No objection to the targets listed in Appendix II.</p> <p>In relation to Appendix I, it is requested that all bodies with actions will be listed in the final document for publication.</p> <p>Also, in relation to Appendix I, it is not clear how all relevant agencies and local authorities will develop the knowledge to insert required sustainable building processes into tenders. An example is:</p> <p><i>"Public bodies leading by example, shall specify low carbon construction methods and low carbon cement material as far as practicable for directly procured or supported construction projects from 2023."</i></p> <p>It may be beneficial for the report to acknowledge also that pathways and additional resources will be required for delivery of some actions such as this.</p>
4	<p>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?</p>
Response	<p>The document notes that a key objective is enhancing GPP as a key tool for the Public Sector in helping Irelands transition to a circular economy.</p> <p>The document states the next Circular Economy Strategy will be published in 2024 and will contain targets for several sectors of the economy. For instance, targets will cover:</p> <ul style="list-style-type: none"> ● Reductions in material resource consumption and the use of non-recyclable materials. ● Increases in the use of re-usable products and materials. ● Increased levels of repair and re-use of products and materials. ● Improved maintenance and optimised use of goods, and materials. <p>The Strategy must include sectoral targets in relation to:</p> <ul style="list-style-type: none"> ● construction; ● agriculture;

Number	Question
	<ul style="list-style-type: none"> • retail; • packaging; • textiles; • electronic equipment. <p>As this is not yet published the targets within it are not known or the implementing agencies. As a result how it may be prepared for or implemented through GPP is not clear.</p>
5	<p>Have you any other comments or feedback on the content of the draft Green Public Procurement Strategy and Action Plan?</p>
Response	<p>The Public Sector Climate Action Mandate is notable and requires public bodies to show leadership in climate action by taking, and reporting on specified actions related to targets (for example as regards GHG emission reductions and energy efficiency improvements), people (for example, the setting up of green teams and the appointment of Sustainability Officers), collaborative ways of working (for example, reporting on the implementation of the mandate), and procuring buildings and vehicles (for example, the phasing out the use of parking in buildings where public transport and alternative mobility options are available).</p> <p>The document notes that a Climate and Sustainability Champion will be appointed as a requirement under the Public Sector Climate Action Mandate. It is noted that how resources will be allocated to drive this and appoint sustainability officers is not set out in the Strategy and is a critical provision.</p> <p>It is noted that there is a need for a dedicated EU or national approach to the training requirements of key staff to bring about change in this area.</p>