

**From:** [REDACTED]  
**To:** [DECC GPP](#)  
**Subject:** Response To The Public Consultation On The Draft Green Public Procurement Strategy And Action Plan  
**Date:** Friday 17 November 2023 17:14:06  
**Attachments:** [ZWAI-GPPSAP-08 Complete submission to the DECC, 17-Nov-2023.pdf](#)

---

**CAUTION:** This eMail originated from outside your organisation and the BTS Managed Desktop service. Do not click on any links or open any attachments unless you recognise the sender or are expecting the email and know that the content is safe. If you are in any doubt, please contact the OGCIO IT Service Desk.

Public Consultation on the Draft Green Public Procurement Strategy and Action Plan,  
Circular Economy – Strategic Policy Division,  
Department of the Environment, Climate and Communications,  
Newtown Road, Wexford,  
Y35 AP90.

Dear Sir / Madam,

**Response To The Public Consultation On The Draft Green Public Procurement Strategy And Action Plan**

**Submitted By Zero Waste Alliance Ireland to the Department of the Environment, Climate and Communications**

On behalf of Zero Waste Alliance Ireland (ZWAI), we attach our submission in response to the Department’s public consultation on the Government’s draft Green Public Procurement Strategy and Action Plan.

ZWAI is very pleased to have the opportunity to respond to this important public consultation, and the intention of our submission is to provide observations which will hopefully have some influence on the final shape and content of the new Green Public Procurement Strategy and Action Plan.

We look forward to your acknowledgement of the submission, and to seeing in due course the final version of the Government’s GPP&AP.

[REDACTED]

**On behalf of Zero Waste Alliance Ireland**

\*\*\*\*\*



\*\*\*\*\*

**An Tinteán Nua,** **Loc8 Code:** MJQ-56-27G **Eircode** N91 PP76  
**Ballymanus,** **Telephone** [REDACTED]  
**Castlepollard,** **Mobile** [REDACTED]  
**County Westmeath,**  
**Ireland.** **E-mail** [REDACTED]

\*\*\*\*\*

# ZERO WASTE ALLIANCE IRELAND

*Towards Sustainable Resource Management*

---



## Submission to the Department of the Environment, Climate and Communications on the draft Green Public Procurement Strategy and Action Plan

17 November 2023

Zero Waste Alliance Ireland is a member of



and



An Tinteán Nua, Ballymanus, Castlepollard, County Westmeath, Ireland An  
Tinteán Nua, Baile Mhánais, Baile na gCros, Co. an Iarmhí, Éire, N91 PP76.  
Telephone: [REDACTED] Email: [admin@zwai.ie](mailto:admin@zwai.ie)

# ZERO WASTE ALLIANCE IRELAND

*Towards Sustainable Resource Management*

---

An Tinteán Nua, Ballymanus, Castlepollard, County Westmeath  
An Tinteán Nua, Baile Mhánais, Baile na gCros, Co. an Iarmhí, N91 PP76.

---

17 November 2023

Public Consultation on the Draft Green Public Procurement Strategy and Action Plan,  
Circular Economy – Strategic Policy Division,  
Department of the Environment, Climate and Communications,  
Newtown Road,  
Wexford,  
Y35 AP90.

**BY EMAIL TO:**  
gpp@decc.gov.ie

Dear Sir / Madam,

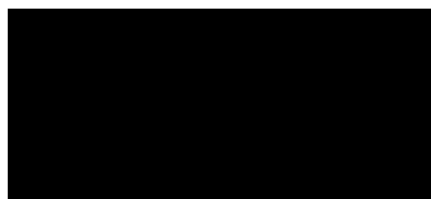
**Response To The Public Consultation On The Draft Green Public Procurement Strategy And Action Plan**

**Submitted By Zero Waste Alliance Ireland to the Department of the Environment, Climate and Communications**

On behalf of Zero Waste Alliance Ireland (ZWA), we attach our submission in response to the Department's public consultation on the Government's draft Green Public Procurement Strategy and Action Plan.

ZWA is very pleased to have the opportunity to respond to this important public consultation, and the intention of our submission is to provide observations which will hopefully have some influence on the final shape and content of the new Green Public Procurement Strategy and Action Plan (GPP&AP).

We look forward to your acknowledgement of the submission, and to seeing in due course the final version of the Government's GPP&AP. Yours sincerely,



# ZERO WASTE ALLIANCE IRELAND

**On behalf of Zero Waste Alliance Ireland**

ZWAI-GPPSAP-04 Cover letter with submission to DECC, 17-Nov-2023.docx

## *Towards Sustainable Resource Management*

---



### **RESPONSE TO THE PUBLIC CONSULTATION ON THE DRAFT GREEN PUBLIC PROCUREMENT STRATEGY AND ACTION PLAN**

**SUBMITTED BY ZERO WASTE ALLIANCE IRELAND TO THE DEPARTMENT OF THE  
 ENVIRONMENT, CLIMATE AND COMMUNICATIONS**

#### **CONTENTS**

	Page
<b>1. Introduction .. .. .</b>	1
<b>2. Zero Waste Alliance Ireland (Zwai) .. .. .</b>	5
2.1 Origin and early activities of Zwai .. .. .	5
2.2 Our basic principles .. .. .	6
2.3 What we are doing .. .. .	7
<b>3. Context and elements of Green Public Procurement –          Strategic Public Procurement, Socially Responsible Public          Procurement and Innovation Procurement .. .. .</b>	<b>9</b>
3.1 Definition of Green Public Procurement .. .. .	9
3.2 Strategic Public Procurement .. .. .	10
3.3 Socially Responsible Public Procurement .. .. .	11
3.4 Innovation Procurement .. .. .	13
<b>4. Some further observations on Green Public Procurement</b>	<b>16</b>
4.1 Improving consumer choice and creating a demand for better products .. .. .	16
<b>5. Enforcement, knowledge and verification .. .. .</b>	<b>17</b>
5.1 Enforcement .. .. .	17
5.2 Knowledge .. .. .	18

---

# ZERO WASTE ALLIANCE IRELAND

Contd

Page 1 of 2

## CONTENTS

	Page
5.3 Measurement.....	20
5.4 Verification.....	21
<b>6. Guidance (Establishing the Importance of ‘Green’) .....</b>	<b>22</b>
6.1 Metrics.....	23
<b>7. Organisational culture and coordination (recommendations for effective design and implementation) .....</b>	<b>24</b>
7.1 Establishing Green Procurement as an organisational priority .....	25
7.2 Encouraging leadership .....	26
7.3 Promoting positive perceptions.....	27
7.4 Facilitating the trial of new alternatives and acceptance of change .....	28
7.5 Coordinate objectives .....	29
7.6 Targets and goals.....	29
7.6.1 Clear goals and specific criteria.....	29
7.6.2 Target setting.....	30
7.6.3 Project-level targets.....	31
7.6.4 Product Level Targets.....	32
7.7 Public Green Procurement as consumer, where “consumers” are public agencies.....	33
<b>8. Conclusion .....</b>	<b>34</b>

### Figures page

Figure 3.4	Europe wide benchmarking of national innovation procurement policy frameworks, with Ireland highlighted	15
------------	---	----

---



**Submission by Zero Waste Alliance Ireland in Response to the  
Public Consultation by the DECC on the draft Green Public  
Procurement Strategy and Action Plan**

---

ZWAI-GPPSAP-07 Contents of first draft of submission, 17-Nov-2023.docx

Page 2 of 2

# ZERO WASTE ALLIANCE IRELAND

*Towards Sustainable Resource Management*

---



## RESPONSE TO THE PUBLIC CONSULTATION ON THE DRAFT GREEN PUBLIC PROCUREMENT STRATEGY AND ACTION PLAN

SUBMITTED BY ZERO WASTE ALLIANCE IRELAND TO THE  
DEPARTMENT OF THE ENVIRONMENT, CLIMATE AND  
COMMUNICATIONS

### 1. INTRODUCTION

On 29 September 2023, the Minister of State with special responsibility for Public Procurement, eGovernment, Communications and the Circular Economy, Mr Ossian Smyth, T.D., launched a public consultation on the Government's draft Green Public Procurement Strategy and Action Plan.

The introduction to the consultation states that Irish society and the country as a whole must make the transition to more sustainable production and consumption by changing how we consume materials and resources; how we design products which we use; and how we extend the productive life of all goods and products in our society and economy. The Circular Economy offers an alternative to today's linear ('take-make-waste') model of production and consumption that helps us to move towards a more sustainable future.

One of the reasons for this consultation is that "**Green Public Procurement**" (**GPP**), a process whereby public authorities attempt to source goods, services or works with a reduced environmental impact, is a primary area of the Government's policy and economic activity which can help to play a key role in



making Ireland's economy more resource-efficient, and can assist in making the country's transition to a Circular Economy.

A second important reason for developing a new Green Public Procurement (GPP) policy is that the current national green public procurement policy, known as "*Green Tenders*" is now more than a decade old, and has become outdated; and therefore a new GPP policy is needed to ensure consistency with Ireland's Whole of Government Circular Economy Strategy,<sup>1</sup> the Programme for Government, the Climate Action Plan,<sup>2</sup> and the Waste Action Plan for a Circular Economy.<sup>3</sup>

GPP is an important area of Government activity, if only for the reason that the Government's annual public sector purchasing accounts for 10-12% of Ireland's GDP, a very significant part of the country's economic activity and demand. Ireland's public sector can therefore exert a significant influence to stimulate the provision of more resource-efficient and less polluting goods and services.

The public sector therefore has a responsibility to promote green procurement, in order to support Ireland's environmental and wider sustainable development goals. Citizens need to be sure that what is purchased on their behalf has minimal harmful effects on the environment and society, while these goods and services must also represent both short-term and long-term value for money.

An additionally important reason is that GPP is recognised internationally as an effective means for public administrations to manage the balance between cost effectiveness and sustainable development.

For the above reasons, the Department of the Environment, Climate and Communications has developed a new draft Green Public Procurement Strategy and Action Plan; and, when finalised, this strategy and action plan will replace 'Green Tenders'. The Strategy is being prepared against the background of recent significant changes in climate, energy, sustainability, and procurement

---

<sup>1</sup> On 11 June 2021, Zero Waste Alliance Ireland made a submission to the Department of Environment, Climate and Communications on the proposed Whole-of-Government Circular Economy Strategy: <https://www.zwai.ie/resources/2021/circular-economy-strategy-for-ireland/> and on 05 July 2023, ZWAI made a submission to Ireland's Regional Waste Management Planning Offices on the draft Waste Management Plan for a Circular Economy: <https://www.zwai.ie/resources/2023/submission-on-the-draft-waste-management-plan-for-acircular-economy/>

<sup>2</sup> On 20 September 2022, Zero Waste Alliance Ireland made a submission to the Department of the Environment, Climate and Communications to support and inform the preparation of the 2023 Climate Action Plan.

<sup>3</sup> In September 2020, Zero Waste Alliance Ireland prepared draft observations on the Government's Waste Action Plan for a Circular Economy, but no submission was made.

policies, and the aim of the Strategy and Action Plan is to significantly increase Green Public Procurement implementation across the public sector.

---

The Department's draft document for public consultation makes the key point that:

*“GPP is one of the ways in which public bodies can help to shape a transition to a Circular Economy, and to help meet the 2030 legally binding targets for reducing GHG emissions and improving energy efficiency. By using their purchasing power to choose goods, services and works with a reduced environmental impact, public sector expenditure can make an important contribution towards national and international sustainability goals”.<sup>4</sup>*

The Department's draft document for public consultation also states that GPP can be used to address a wide range of environmental, climate and energy issues including:

- ✓ Eliminating or reducing waste, for example by specifying processes or packaging which generates less waste, or by encouraging reuse and recycling of materials and,
- ✓ Optimising water use, for example through choosing more water-efficient fittings.<sup>5</sup>

The fact that the proposed draft Green Public Procurement Strategy and Action Plan is intended to make an important contribution to national and international sustainability goals, to reduce or eliminate waste (including the wasting of water), and to accelerate the transition to a more circular economy where materials remain in use for longer, are valid and rational objectives fully supported by Zero Waste Alliance Ireland.

It has always been our “zero waste” policy that the wasting or discarding of substances, materials, manufactured objects and products of every description; and especially their end-of-life fate by incineration or landfilling, resulting in the continuing extraction and processing of yet more raw materials to replace them,

---

<sup>4</sup> Buying Greener: Draft Green Public Procurement Strategy and Action Plan 2023-2027, Draft for Public Consultation; section 1.3, page 7. Prepared by the Department of The Environment, Climate and Communications, 29 September 2023.

<sup>5</sup> Buying Greener: Draft Green Public Procurement Strategy and Action Plan 2023-2027, Draft for Public Consultation; section 1.3, page 6. Prepared by the Department of The Environment, Climate and Communications, 29 September 2023.

cause widespread detrimental effects on the Earth's climate and on biodiversity. Not only must discarded materials be replaced in the continuing cycle of production, but the processes of extraction, transformation, transport, processing,

---

manufacturing and distribution require yet further energy which could be used more beneficially or avoided completely.

Based on our research and our carefully considered view that prevention of waste, and dealing responsibly with discarded or unwanted materials and objects, are activities which must be seen in a wider perspective, it is a key element of our submission that **Green Public Procurement of materials and services, waste prevention and achievement of the Circular Economy must be implemented as part of an over-arching, integrated and comprehensive whole-of-Government environmental and climate action policy.**

Widespread failure to implement clean production processes, to ensure extended producer responsibility, and to recover, re-use and recycle discarded substances, materials and products, are symptoms of our European-wide and Irish failure to implement the Circular Economy, with a resulting increase in greenhouse gas emissions, serious damage to ecosystems, major loss of biodiversity, changes in sea level, stronger and more frequent storm events, threats to the security of food supplies, damage to human health, and other adverse consequences of inadequate environmental policies at all levels.

When the Minister of State launched a public consultation on the Government's draft Green Public Procurement Strategy and Action Plan, we immediately saw this consultation as being extremely relevant to the areas in which Zero Waste Alliance Ireland contributes to debates and consultations on policy issues.

The above conclusion, and one of our primary reasons for responding to this important consultation, is that our principal areas of policy analysis are focussed on prevention of waste, and on the elimination of wasting or discarding substances, materials, made objects (natural or man-made) and products of every description; and we especially oppose their end-of-life fate by incineration or landfilling, resulting in the continuing extraction and processing of yet more raw materials to replace them.

Closely allied with these areas of work are our promotion of the Circular Economy, and our support for schemes such as "deposit and return" which would have the effect of increasing the rate at which materials and objects are re-used

and recycled. Green Public Procurement, when fully implemented, would make a significant contribution to these objectives; while the above positive activities may be summarised as promoting the transition from a wasteful linear to a more efficient circular economy, together with accompanying changes in how our society values and uses non-living and living (plant-based and animal-based) materials, and the manufactured goods we produce from them.

## **2. ZERO WASTE ALLIANCE IRELAND (Zwai)**

At this point we consider that it is appropriate to mention briefly the background to our submission, especially the policies and strategy of Zwai.

### **2.1 Origin and Early Activities of Zwai**

Zero Waste Alliance Ireland (Zwai), established in 1999, and registered as a company limited by guarantee in 2004, is a Non-Government Environmental Organisation (eNGO) and a registered charity. Zwai has prepared and submitted to the European Commission, the Irish Government and to Irish State Agencies many policy documents on waste management, and continues to lobby the Irish Government and the European Commission on the issue of using resources more sustainably, on using resources sustainably, on promoting reuse, repair and recycling, and on development and implementation of the Circular Economy.

One of our basic guiding principles is that human societies must behave like natural ecosystems, living within the sustainable flow of energy from the sun and plants, producing no materials or objects which cannot be recycled back into the earth's systems, or reused or recycled into our technical systems, and should be guided by economic systems and practices which are in harmony with personal and ecological values. Our principal objectives are:

- i) sharing information, ideas and contacts,
- ii) finding and recommending environmentally sustainable and practical solutions for domestic, municipal, industrial and agricultural waste management, and for more efficient and ecologically appropriate uses of natural resources such as scarce minerals, water and soil;
- iii) lobbying Government and local authorities to implement environmentally sustainable waste management practices, including clean production, elimination of toxic substances from products, re-use, repairing, recycling, segregation of discarded materials at source, and other environmentally and socially beneficial practices;

- iv) lobbying Government to follow the best international practice and EU recommendations by introducing fiscal and economic measures designed to penalise the manufacturers of products which cannot be re-used, recycled or composted at the end of their useful lives, and to financially support companies making products which can be re-used, repaired, recycled or are made from recycled materials;
- v) raising public awareness about the long-term damaging human and animal health and economic consequences of landfilling and of the destruction of potentially recyclable or re-usable materials by incineration; and,
- vi) investigating, raising public awareness and lobbying Irish Government departments and agencies about our country's failure to take adequate care of vulnerable and essential natural resources, including clean water and air, biodiversity, and soil;
- vii) advocating changes in domestic and EU legislation to provide for more ecologically appropriate, environmentally sustainable and efficient uses of natural resources; and,
- viii) maintaining contact and exchanging information with similar NGOs and national networks in other countries, and with international zero waste organisations.

## **2.2 Our Basic Principles**

Human communities must behave like natural ones, living comfortably within the natural flow of energy from the sun and plants, producing no wastes which cannot be recycled back into the earth's systems, and guided by new economic values which are in harmony with personal and ecological values.

In nature, the waste products of every living organism serve as raw materials to be transformed by other living creatures, or benefit the planet in other ways. Instead of organising systems that efficiently dispose of or recycle our waste, we need to design systems of production that have little or no waste to begin with.

There are no technical barriers to achieving a "zero waste society", only our habits, our greed as a society, and the current economic structures and policies which have led to the present environmental, social and economic difficulties.

"Zero Waste" is a realistic whole-system approach to addressing the problem of society's unsustainable resource flows – it encompasses waste elimination at source through product design and producer responsibility, together with waste

reduction strategies further down the supply chain, such as cleaner production, product repairing, dismantling, recycling, re-use and composting.

ZWAI strongly believes that Ireland and other Member States, and the EU as a whole, should have a policy of not sending to other countries our discarded materials for further treatment or recycling, particularly to developing countries where local populations are being exposed to dioxins and other very toxic POPs. Relying on other countries' infrastructure to achieve our "recycling" targets is not acceptable from a global ecological and societal perspective.

### **2.3 What We are Doing**

Our principal objective is to ensure that government agencies, local authorities and other organisations will develop and implement environmentally sustainable resources and waste management policies, especially resource efficiency, waste reduction and elimination, the promotion of re-use, repair and recycling, and the development and implementation of the Circular Economy.

As an environmental NGO, and a not-for-profit company with charitable status since 2005, ZWAI also campaigns for the implementation of the UN Sustainable Development Goals, including (but not limited to) Goal 12, Responsible Consumption and Production; Goal 6, Clean Water and Sanitation (having particular regard to the need to avoid wasting water); and Goal 15, to protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and to halt and reverse land degradation and halt biodiversity loss.

In responding to many public consultations, members of ZWAI have made submissions and given presentations on:

- how Ireland and the European Union should address the problem of plastic waste (March 2019);
- the problem of single-use plastic packaging by the Irish food industry (November 2019);
- transforming the construction industry so that it could become climateneutral (instead of its present position as a major emitter of greenhouse gases and toxicants);
- the general scheme of the Irish Government's Circular Economy Bill (October 2021);
- recovery and reuse of the phosphorus and nitrogen content of wastewater (2019 to 2022);

- proposed revision of the EU Regulation on Shipments of Waste (January 2022);
- Ireland's energy security situation (October 2022);
- Ireland's Fourth National Biodiversity Action Plan (November 2022);
- Ireland's National Bioeconomy Action Plan 2023-2025 (January 2023);
- Ireland's draft Waste Management Plan for a Circular Economy (July 2023);<sup>6</sup>
- the problem of disposable vaping devices (July 2023);<sup>7</sup>
- the rapidly increasing European and global problem of waste electronic and electric equipment (WEEE, September 2023);<sup>8</sup> and,
- observations to the European Commission on a Proposed EU Directive on Soil Monitoring and Resilience (November 2023).<sup>9</sup>

It will be clear that ZWAI is primarily concerned with the very serious issue of discarded substances, materials and goods, whether from domestic, commercial or industrial sources, how these become “waste”, and how such “waste” may be prevented by re-design along ecological principles.

**ZWAI** is represented on the Irish Government's Waste Forum and Water Forum (An Fóram Uisce), is a member of the Irish Environmental Network and the Environmental Pillar, and is funded by the Department of Communications, Climate Action and the Environment through the **Irish Environmental Network**.

In 2019 ZWAI became a full member of the **European Environment Bureau** (EEB); and a member of the **Waste Working Group** of the EEB. Through the EEB, we contribute to the development of European Union policy on waste and

---

<sup>6</sup> Submission to the Regional Waste Management Planning Offices on the draft Waste Management Plan for a Circular Economy; ZWAI, 05 July 2023:  
<https://www.zwai.ie/resources/2023/submission-on-the-draft-waste-management-plan-for-acircular-economy/>

<sup>7</sup> Submission to the Department of the Environment, Climate and Communications in Response to the Department's Public Consultation on Disposable Vaping Devices; ZWAI, 27 July 2023: <https://www.zwai.ie/resources/2023/submission-to-the-decc-on-disposable-vapesand-why-they-should-be-banned/>

<sup>8</sup> Submission by ZWAI to the European Commission on Waste from Electrical and Electronic Equipment — Evaluating the EU Rules; ZWAI, 22 September 2023.  
<https://www.zwai.ie/resources/2023/waste-from-electrical-and-electronic-equipment-weeeevaluating-eu-rules/>

<sup>9</sup> Observations and Feedback to the European Commission on the Proposed EU Directive on Soil Monitoring and Resilience; ZWAI, 03 November 2023.

the Circular Economy. In November 2021, the EEB established a **Task Force on the Built Environment**; ZWAI is a member of this group, and we contribute to discussions on the sustainability of construction materials, buildings and on the built environment.

---

### **3. CONTEXT AND ELEMENTS OF GREEN PUBLIC PROCUREMENT – STRATEGIC PUBLIC PROCUREMENT, SOCIALLY RESPONSIBLE PUBLIC PROCUREMENT AND INNOVATION PROCUREMENT**

Green Public Procurement (GPP) is defined in the European Commission's Communication "**Public Procurement for a Better Environment**"<sup>10</sup> as "a process whereby public authorities seek to procure goods, services and works with a reduced environmental impact throughout their life-cycle when compared to goods, services and works with the same primary function that would otherwise be procured".<sup>11</sup>

A handbook on green public procurement, published by the European Commission in 2016,<sup>12</sup> outlines the possibilities to pursue GPP under the 2014 Procurement Directives,<sup>13</sup> the most relevant of which is the Public Sector Directive, even though most of the same possibilities for pursuing GPP also exist under the other two directives.

#### **3.1 Definition of Green Public Procurement**

---

<sup>10</sup> Public Procurement for a Better Environment. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, European Commission, Brussels, 16.7.2008 COM(2008) 400 final.

<sup>11</sup> COM (2008) 400, at page 4.

<sup>12</sup> *Buying green! A handbook on Green Public Procurement*, 3rd Edition, 2016; 80 pp. European Commission, compiled under Contract No 071201/2014/692772//SER/ENV.F.1 between the European Commission and ICLEI – Local Governments for Sustainability, supported by Public Procurement Analysis (PPA).

<sup>13</sup> Directive 2014/23/EU of the European Parliament and of the Council on the award of concession contracts ('the Concessions Directive'); Directive 2014/24/EU of the European Parliament and of the Council on public procurement and repealing Directive 2004/18/EC ('the Public Sector Directive'); and Directive 2014/25/EU on procurement by entities operating in the water, energy, transport and postal services sector and repealing Directive 2004/17/EC ('the Utilities Directive').



Green Public Procurement (GPP) is defined in the European Commission's Communication, "*Public Procurement for a Better Environment*", as "*a process whereby public authorities seek to procure goods, services and works with a reduced environmental impact throughout their life cycle when compared to goods, services and works with the same primary function that would otherwise be procured.*"

It is worth remembering that the above definition and its publication appeared some 15 years ago as a voluntary instrument, allowing Member States to determine the extent to which policies or criteria are applied. GPP was conceived

---

within the framework of **Strategic Public Procurement**, which includes **Socially Responsible Public Procurement (SRPP)** and **Innovation Procurement**.

### **3.2 Strategic Public Procurement**

The Department's draft document for public consultation makes only one mention of strategic public procurement, which is described as the procurement of innovation and the promotion of social objectives in public contracts, but may also include the use of accessibility criteria for people with disabilities, the procurement of clean vehicles, and SME participation in public procurement.<sup>14</sup>

We consider this to be a very narrow and inadequate definition of strategic public procurement, and it is therefore our submission that the proposed Green Public Procurement and Action Plan for Ireland must also be located and embodied in a much wider and more all-embracing version of Strategic Public Procurement, which would include socially and environmentally responsible policies and objectives, together with a "Just Transition" approach, to ensure that no groups of people become disadvantaged as a consequence of its implementation. However, we also believe that an environmentally and socially responsible form of GPP would not cause disadvantages or economic problems to any group; but, should such problems occur as a result, we advocate that the government should devise and implement economic supports where necessary.

The basic concept of GPP relies on having clear, verifiable, justifiable, and ambitious environmental criteria for products and services, based on a life-cycle approach and scientific evidence base.

The proposed Green Public Procurement and Action Plan for Ireland consultation document refers to a **Strategic Procurement Advisory Group (SPAG)**, which is described as an advisory forum at which representatives of the Office of Government Procurement (OGP, Policy and Sourcing) and its partner Central Purchasing Bodies (CPBs) and public procurement practitioners from across government meet with policymakers from a range of Government departments. The Group shares information, knowledge and understanding and collaborates on promoting the incorporation of social, innovative, and sustainable considerations in public procurement.

**Zero Waste Alliance Ireland** has not previously been aware of the Strategic Procurement Advisory Group, but we would certainly support its work, while suggesting that the group must of necessity include environmental and

---

<sup>14</sup> Buying Greener: Draft Green Public Procurement Strategy and Action Plan 2023-2027, Draft for Public Consultation; section 10.3, page 57. Prepared by the Department of The Environment, Climate and Communications, 29 September 2023.

sustainability experts, independent of government, and details of the group's activities and meetings should be publicly available. Strategic public procurement should become an area of public interest and discussion in order that its implementation reflects the needs of society and the environment.

### **3.3 Socially Responsible Public Procurement**

Socially Responsible Public Procurement (SRPP), to which we refer briefly above, requires public purchasers of goods and services to look beyond the price of products or services, and also consider how they are produced, sourced and delivered. SRPP should require public purchasers to strategically deliver positive social outcomes, such as promoting employment opportunities, decent work, social inclusion, accessibility, and compliance with social and labour rights in Ireland, while delivering high quality social services and facilitating the access of social businesses to public tenders.

It is our submission that SRPP should be implemented in a way which assists public authorities to achieve additional social and ethical benefits even when budgets are limited. In this way, SRPP can also contribute to countering the negative impacts of the current economic system which leaves many individuals and groups marginalised.

*“By purchasing wisely, public buyers can promote employment opportunities, up and reskilling of the workforce, decent work, social inclusion, gender equality and non-discrimination, accessibility, design for all, ethical trade, and seek to achieve wider compliance with social standards. For some products, works and services, the impact can be particularly significant, as public purchasers command a large share of the market in sectors such as civil engineering, healthcare and transport”.*<sup>15</sup>

The Department's draft document for public consultation makes several mentions of socially responsible public procurement, including the very welcome statement that:

*“Sustainable public procurement, which incorporates green public procurement and socially responsible public procurement, achieves value*

---

<sup>15</sup> "Buying Social - a guide to taking account of social considerations in public procurement (2nd edition)", 2021. Commission Notice C(2021) 3573 final. Brussels, 26.5.2021.

*for money on a whole life-cycle basis in terms of generating benefits not only to the purchasing entity, but also to society more generally and the*

---

*economy, whilst significantly reducing negative impacts on the environment”.*<sup>16</sup>

**Zero Waste Alliance Ireland** also welcomes the statement in the Department’s draft document for public consultation that:

*“In practical terms, when using sustainable public procurement public bodies seek to achieve an appropriate balance of the three pillars of sustainable development – economic, social, and environmental – at all stages of the procurement process”.*<sup>17</sup>

Another very welcome and positive statement in the Department’s draft document for public consultation describes how social enterprises and community-based organisations can play an important role in advancing Green Public Procurement objectives, particularly in promoting and advancing the circular economy and promoting reuse and repair.

The document describes how ...

*“A new Green and Social Virtual Trade Fair was launched by Community Resources Network Ireland (CRNI), with support of the Regional Waste Management Plan Offices in 2022. This innovative virtual platform gives visitors the opportunity to explore green and social procurement opportunities provided by reuse, repair and recycling social enterprises and community-based organisations across Ireland. The virtual platform includes categories such as furniture upcycling and office fit outs; bike donations, upcycling, and repair; reducing food and drink waste; recycling electric and electronic equipment; reducing plastic waste; specialist social*

---

<sup>16</sup> Buying Greener: Draft Green Public Procurement Strategy and Action Plan 2023-2027, Draft for Public Consultation; section 1.3, page 5. Prepared by the Department of The Environment, Climate and Communications, 29 September 2023.

<sup>17</sup> Buying Greener: Draft Green Public Procurement Strategy and Action Plan 2023-2027, Draft for Public Consultation; section 1.3, page 6. Prepared by the Department of The Environment, Climate and Communications, 29 September 2023.

*recycling and repair schemes, textile reuse and upcycling, paint reuse and recycling; events, education, and workshops”<sup>18</sup>*

In our view, the mention of activities such as furniture recycling, reducing food and drink waste, recycling electric and electronic equipment, reducing plastic waste, social recycling repair schemes, textile use and up cycling, paint reuse and recycling, and the promotion of events such as workshops and educational activities, are fully in line with our own zero waste aims and objectives. However,

---

we must add that barriers the present barriers to these activities should be examined and removed. At present there are serious problems with organising and holding repair workshops; and evidence of this is shown by the negligible number of such workshops organised in Ireland, in comparison with the numbers in other EU Member States.

### **3.4 Innovation Procurement**

Innovation Procurement, to which we also refer briefly above, should be a key component of any Strategic Public Procurement Policy and Action Plan in Ireland, given that innovation is such a vital tool for maintaining our technological and economic vitality and strengths. According to the European Commission, public procurement accounts for over 14% of the Member States’ combined GDP; and, while it could create a huge market for innovative products and services, its potential to do so remains underutilised.

Under the title of Innovation Procurement, the European Commission aims to improve public procurement practices, promote the demand of innovative goods, services and works in Europe, and foster the uptake of innovation in the EU. This will allow the integration of public demand into the current systems of innovation support, and should foster economic progress. However, it is our submission that innovation and economic progress must not take place at the expense of the environment; and, line with our own **Zero Waste Alliance Ireland** policies and objectives, innovation procurement should be particularly strongly aimed at new ways of providing goods and services which do not result in the production of waste, and should result in these goods and services helping to implement the Circular Economy.

Innovation procurement includes:

---

<sup>18</sup> Buying Greener: Draft Green Public Procurement Strategy and Action Plan 2023-2027, Draft for Public Consultation; section 7.2, page 48. Prepared by the Department of The Environment, Climate and Communications, 29 September 2023.

- ✓ the development of innovative solutions through the procurement of research and development services;
- ✓ the procurement of innovative solutions that are not yet available or do not exist on the market; and,
- ✓ the procurement of innovative solutions that do exist, but are not yet widely available on the market;

Through the public procurement of innovation, public buyers can:

- ✓ shape markets and create new markets; ✓ foster the market uptake of innovative products, services and works; ✓ increase the quality of public services;
- ✓ support access to markets for businesses, especially small and medium-sized enterprises (SMEs);
- ✓ boost smart investment; and, ✓ have a large positive impact on mobility, health, education, etc. due to the high volume of public spending.

These are generally desirable, and in some cases extremely desirable, aims and objectives, but we must again reiterate that in public procurement of innovation must not be solely market-driven, but should prioritise environmental and social objectives and responsibilities.

In order to assist the public procurement of innovation, the European Commission published in 2021 a guidance document on innovation procurement, which includes advice on issues such as:

- ✓ Buying the process of innovation – research and development services – with (partial) outcomes;
- ✓ Buying the outcomes of innovation; ✓ Innovation as means of achieving various policy goals; ✓ Setting the level of ambition for innovation procurement; ✓ Translating ambitions into actions and commitments; ✓ Building up capacity for innovation procurement; ✓ Considering cooperative procurement, i.e., models of cooperation between public buyers; and,
- ✓ Overcoming risk aversion by creating incentives to innovate.<sup>19</sup>

---

<sup>19</sup> Guidance on Innovation Procurement. Commission Notice C(2021) 4320 final. Brussels, 18.6.2021.

The guidance document provides many examples, including a pilot initiative in the area of cooperative procurement aimed at increasing the uptake of innovation procurement in Europe through partnerships among public buyers. Examples described zero emission construction sites, heavy duty electric vehicles, waste trucks, and ‘circular’ construction material. These examples are areas of particular interest to Zero Waste Alliance Ireland and demonstrate what can be done by public agencies working co-operatively.

The Department’s draft document for public consultation makes several mentions of innovation in public procurement, including innovation partnerships, a system and procedure which allow for the combination of research, innovation and

---

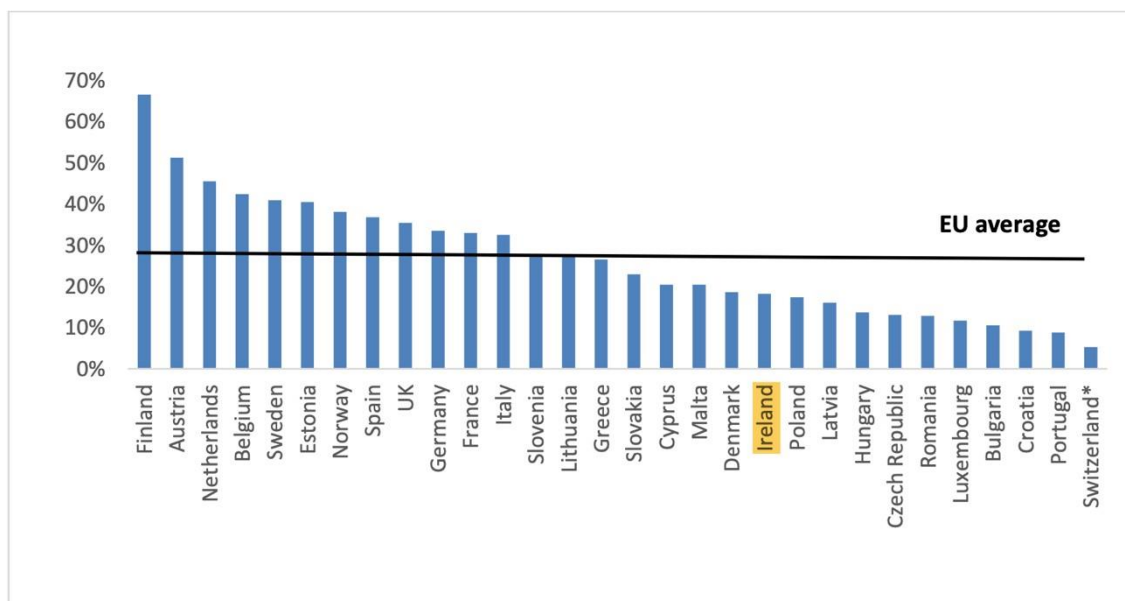
procurement, in circumstances where the market cannot already provide a solution. There are three key phases to this procedure – the tendering phase, the collaborative development phase, and the commercial phase for the delivery of the final goods, services, or works. The innovation partnership has been used by contracting authorities across Europe to find green, social, and digital solutions.<sup>20</sup>

Under the title of Research and Innovation, the Department’s draft document for public consultation states that Ireland will continue to utilise all relevant EU and national research and innovation mechanisms to support GPP activities and inform related policy, including, through programmes led at EU level such as Horizon Europe and at national level led by Science Foundation Ireland. Current EPA research projects relevant to GPP and that are due for completion in 2024 include a review of the state-of-the-art GPP and practice, and building on the existing data, knowledge and resources into a pilot toolkit.<sup>21</sup>

---

<sup>20</sup> Buying Greener: Draft Green Public Procurement Strategy and Action Plan 2023-2027, Draft for Public Consultation; **GPP Principle 2d**: Where a sustainable or environmental solution is not available on the market, consideration should be given to using an innovative procurement procedure or the innovation partnership to find goods, services, or works that meet your needs, page 29. Prepared by the Department of The Environment, Climate and Communications, 29 September 2023.

<sup>21</sup> Buying Greener: Draft Green Public Procurement Strategy and Action Plan 2023-2027, Draft for Public Consultation; section 13, page 62. Prepared by the Department of The Environment, Climate and Communications, 29 September 2023.



**Figure 3.4 Europe wide benchmarking of national innovation procurement policy frameworks, with Ireland highlighted.**

Benchmarking results (see Figure 3.4 above) show how far EU Member States have already progressed in rolling out national policy frameworks for innovation procurement; while at the same time it must be acknowledged that the overall innovation policy framework across Europe is only working at just above one fourth of its potential power. Globally, it can be observed that innovation procurement is not yet a strategic priority in many countries, and that incentives and capacity-building structures are also insufficient to support public buyers in implementing innovation procurement.

Member States that are at the forefront of innovation in general have also put in place a policy framework for innovation procurement; and Figure 3.4 above shows clearly that Ireland is not among the leaders, but we are not one of the laggards either. Therefore, strengthening investment in the development of a more strategic policy framework for public procurement of innovation in Ireland could contribute to increase the competitiveness of the Irish economy.

## 4. SOME FURTHER OBSERVATIONS ON GREEN PUBLIC PROCUREMENT

### 4.1 Improving Consumer Choice and Creating a Demand for



## Better Products

In the area of contemporary consumer decision-making, the conjunction of quality, price, and environmental impact forms a pivotal crossroads. This juncture often necessitates a challenging choice, exemplified by scenarios where a product or service offering superior quality at a lower price carries a notable negative environmental impact compared to a higher-priced alternative of moderate to high quality with minimal environmental repercussions.

Understanding the importance of 'green' considerations amid this conflict is paramount in redefining our priorities and making informed decisions. The discourse surrounding the prioritisation of quality, price, and environmental impact requires an evaluation that transcends the conventional boundaries of consumer choices.

The expansion of metrics and the redefining of priorities are central in navigating the intricate relationship between these factors. To achieve a sustainable equilibrium in this landscape, the significance of prioritising minimal environmental impact while balancing quality and price becomes the focal point of discussion and decision-making.

As we have described briefly in section 3 above, Green Public Procurement (GPP) can drive innovation and set trends for environmentally friendly products, technology and services.<sup>22</sup>,<sup>23</sup> Therefore, improving the effectiveness of sustainability practices in GPP can have a powerful impact on the environmental and social sustainability of Ireland as a whole. The current recommendation from the European Commission<sup>24</sup> advises that the transition to a Green Economy can be achieved by:

1. Improving environmental performance of products throughout their lifecycle;

---

<sup>22</sup> Alvarez, S. and Rubio, A., 2015. Carbon footprint in Green Public Procurement: a case study in the services sector. *Journal of Cleaner Production*, 93, pp.159-166.

<sup>23</sup> European Commission, 2011. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions Youth Opportunities Initiative. Brussels, Belgium: European Commission.<sup>24</sup>

Concerne, E.N. and FR, D., 2020. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions.<sup>25</sup> Convery, F., McDonnell, S. and Ferreira, S., 2007. The most popular tax in Europe? Lessons from the Irish plastic bags levy. *Environmental and resource economics*, 38, pp.111.

2. Promoting and stimulating the demand for better products and production technologies on behalf of the markets; and,
3. Helping consumers to make better informed choices.

Improving the environmental performance of products throughout their lifecycle can be achieved by building in circular economy principles in product design. This means making products durable, easily repairable and recyclable.

## **5. ENFORCEMENT, KNOWLEDGE AND VERIFICATION**

### **5.1 Enforcement**

Enforced compliance through legislative rules and protocols have a positive effect on behaviour and motivation to comply to GPP. Legislation is a powerful tool to encourage compliance in sustainability practices and it has been effective in promoting health and safety practices in workplaces and organisations.

For example, legislation can increase the costs of waste disposal, this results in waste reducing measures becoming more attractive. The plastic bag levy in Ireland was well received by the public and resulted in a 90% reduction in the sale of plastic bags.<sup>25</sup> However, a lack of knowledge of relevant legislation can

---

limit their effectiveness. E-mail and social media updates, newsletters and online magazine subscriptions are available, and can be a cost-effective and time-effective alternative to training sessions or employing consultants.

Sustainability inspectors may be effective in insuring compliance with sustainability compliance; it is worth considering the role of a health and safety inspector in insuring compliance in workplaces, especially construction.

### **5.2 Knowledge**

In order to assist the uptake and improvement of Green Public Procurement, **Zero Waste Alliance Ireland** strongly advocates the importance of environmental knowledge, awareness of alternatives, ability to evaluate options, ability to assess performance as well as information about environmental and practical feasibility

across lifecycles. Information and awareness strongly support the development of public green tenders.<sup>24</sup>

Appointing sustainability experts to working groups can be beneficial by providing somebody workers can turn to for solutions to sustainability problems. This is especially important for Green Public Procurement, when the sustainability of competing products and services can be difficult to elucidate. Regarding suppliers, an engagement and education programme may be effective in promoting more sustainable practices, rather than strict enforcement.

A requirement for training by all staff members in sustainability may be necessary. The system could be modelled on the FÁS Safe Pass Health and Safety Awareness Training Programme, aka the “Safe Pass”. A Safe Pass card is required by all construction workers. The Safe Pass scheme has been recognised internationally for its effectiveness and attempts have been made to emulate it.<sup>25</sup> This course is delivered in one day and informs workers on the potential accidents that can occur on building sites. A one-day sustainability course could likewise inform workers on the risks to the environment posed by unsustainable enterprises. The course could include topics such as greenhouse gas emissions and climate change, persistent environmental pollutants and plastic pollution impacts.

---

### **5.3 Measurement**

What gets measured, gets done – keeping track of intersectoral practices and procurement is highly beneficial for identifying issues to be addressed, adapted, or mitigated, additionally it can help inform enforcement. Waste statistics can reveal cost savings from diverting waste from landfill.

As mentioned above, sustainability inspectors could play a role in both measurement and enforcement. Data gathered by sustainability inspectors could be used to create valuable statistics.

---

<sup>24</sup> Testa, F., Iraldo, F., Frey, M. and Daddi, T., 2012. What factors influence the uptake of GPP (green public procurement) practices? New evidence from an Italian survey. *Ecological Economics*, 82, pp.88-96.

<sup>25</sup> Meekel, S., Paşnicu, D. and Jenkins, J.L., 2011. Improving health and safety on construction in Romania. A comparison with Ireland; lessons to be learned, p.57.

For private corporations, sustainability reporting tools play an important role in ensuring sustainable production and activities. Sustainability performance must be measured to be judged.<sup>26</sup>

Waste management statistics are vital for assessing sustainability performance. The Waste Hierarchy Index for circular economy in waste management provides a score based on levels of municipal solid waste recycled, incinerated and landfilled. This can be employed to rate the sustainability performance of Green Public Performance in different sectors.

## 5.4 Verification

Being able to verify that a good or service is indeed ‘Green’ can be a barrier to the effectiveness of the GPP – this is due to the multiplicity of effects things might have on the environment and the seemingly constant innovation in products. Therefore, establishing a service which the entire public sector could use for procurement whereby the goods and services are already verified to be ‘Green’ or that their environmental impact has been measured and easily comparable to other alternatives would greatly add to the GPP’s effectiveness.

Green IT-enabled Information Systems or “Green IS” have a significant role to play in making organisations and products more environmentally sustainable.<sup>27</sup> Green IS can be used to monitor and verify greenhouse gas emissions, waste, toxic and hazardous materials use; energy use (e.g. transport and buildings management); and to reorganise systems and processes across departments to

---

be more environmentally sustainable.<sup>28</sup> These tools are used to gather data to verify sustainability for stakeholders; especially including the desirable practices of corporate Social Responsibility (CSR) and Environmental, Social and Governance (ESG) reporting – provided of course that these practices are not used as a cover for “green washing”.

---

<sup>26</sup> Özdemir, E.D., Härdtlein, M., Jenssen, T., Zech, D. and Eltrop, L., 2011. A confusion of tongues or the art of aggregating indicators—Reflections on four projective methodologies on sustainability measurement. *Renewable and Sustainable Energy Reviews*, 15(5), pp.2385-2396.

<sup>27</sup> Watson, R.T., Boudreau, M.C., Chen, A. and Huber, M., 2008. Green IS: Building sustainable business practices. *Information systems*, p. 17.

<sup>28</sup> GeSI, S., 2008. Enabling the low carbon economy in the information age. A Report by The Climate Group on behalf of the Global eSustainability Initiative (GeSI).

These systems could be applied to Green Public Procurement. Instead of presenting the results to investors, as in a private corporation, the statistics on GPP should be available to citizens. The Global Reporting Initiative (GRI) was founded in 1997 by the Coalition for Environmentally Responsible Economies (CERES). This initiative makes recommendations, its guidelines are voluntary and non-legally binding.<sup>29</sup> However, Green Public Procurement could benefit from a State-run version of the GRI to verify sustainability of the products and services purchased. See the paper “*A review of corporate sustainability reporting tools (SRTs)*” by Siew for many more examples of sustainability reporting tools.<sup>30</sup>

Tackling greenwashing is vital in order to allow citizens and procurement personnel to make decisions on the sustainability of products and services without being misled.<sup>31</sup> Products and services with genuine green claims are becoming drowned out in a sea of false green claims. Education is key to avoiding falling for greenwashing; a study concluded that “expert consumers” were not significantly affected by greenwashing advertising, while “non-expert consumers” were.<sup>32</sup>

Life Cycle Assessment (LCA) is a methodology for determining the environmental impact of a construction, product or service over its entire lifetime. It takes into account the raw material extraction, transport, refining and manufacturing, distribution, use and final disposal. Guidelines for conducting LCAs are provided by the International Organisation for Standardisation (ISO).<sup>33</sup>

---

## **6. GUIDANCE (ESTABLISHING THE IMPORTANCE OF ‘GREEN’)**

In the modern marketplace, the trilemma of quality, price, and environmental impact often challenges decision-makers and consumers. Take, for instance, the scenario where good or service A is priced competitively, boasts high-quality standards, but bears a significant negative environmental impact. Conversely,

---

<sup>29</sup> Adams, C. and Narayanan, V., 2010. The ‘standardization’ of sustainability reporting. In Sustainability accounting and accountability (pp. 89-104). Routledge.

<sup>30</sup> Siew, R.Y., 2015. A review of corporate sustainability reporting tools (SRTs). Journal of environmental management, 164, pp.180-195.

<sup>31</sup> Nyilasy, G., Gangadharbatla, H. and Paladino, A., 2014. Perceived greenwashing: The interactive effects of green advertising and corporate environmental performance on consumer reactions. Journal of business.

<sup>32</sup> de Freitas Netto, S.V., Sobral, M.F.F., Ribeiro, A.R.B. and Soares, G.R.D.L., 2020. Concepts and forms of greenwashing: A systematic review. Environmental Sciences Europe, 32(1), pp.1-12.

<sup>33</sup> Matthews, H.S., Hendrickson, C.T. and Matthews, D., 2014. Life cycle assessment: quantitative approaches for decisions that matter. Open access textbook.

good or service B presents a higher price point, offers decent to high quality, yet prides itself on a minimal environmental footprint. In such dilemmas, determining the paramount aspect to uphold becomes a critical decision.

Traditionally, economic considerations and quality have wielded significant influence over purchase decisions. The allure of affordability and uncompromised performance often overshadows environmental concerns, relegating sustainability to the periphery. However, the current global climate, rife with environmental challenges, compels a paradigm shift in consumer mindsets.

The urgency of climate change, resource depletion, ecosystem degradation and biodiversity loss underscores the necessity to prioritise 'green' considerations. While quality and price remain crucial factors, an evolving consciousness surrounding environmental sustainability demands a re-evaluation of priorities. As a result, the emphasis must pivot towards the environmental impact.

In this context, the principle of sustainability must supersede traditional metrics. The long-term repercussions of environmentally detrimental choices necessitate a re-ordering of values. When presented with alternatives, the preeminent criterion should lean heavily towards minimal environmental impact. This shift reflects an acknowledgment of the broader ramifications of our decisions on the planet, aiming for sustainable practices that cater to long-term global well-being.

## **6.1 Metrics**

To holistically assess the sustainability of products and services, expanding evaluation metrics beyond quality and price is imperative. Inclusion of additional indicators provides a more comprehensive understanding of the environmental impact and sustainability of products and services:

- 1) Material Recirculation:** Understanding the extent to which materials are recycled, repurposed, or reintegrated into product cycles is paramount. Material recirculation metrics evaluate the efficiency of material reuse, emphasizing the reduction of waste and the promotion of a circular economy. It addresses the significance of minimizing resource extraction and waste generation.
  
- 2) (Re)Utilization:** The metric of (re)utilization delves into the intensity of material usage across its life cycle. It evaluates how thoroughly a material is employed or reused, focusing on optimizing its utility before disposal. Maximizing material use efficiency reduces the consumption of resources and minimizes waste.

- 3) Longevity of Products:** Assessing the longevity of products highlights the endurance and durability of materials. This metric emphasizes the value retention and resilience of materials over an extended period. Products with extended lifespans contribute to reduced waste and resource consumption by mitigating the need for frequent replacements.

Including these additional metrics — material recirculation, (re)utilization, and product longevity (alongside conventional quality and price assessments) enriches the evaluation of sustainability. These metrics offer a more comprehensive view of a product's environmental impact and its potential contribution to sustainable practices. By integrating these aspects into decisionmaking processes, consumers and businesses can better navigate towards more environmentally conscious choices that prioritize sustainability and long-term ecological health.

## **7. ORGANISATIONAL CULTURE AND COORDINATION (RECOMMENDATIONS FOR EFFECTIVE DESIGN AND IMPLEMENTATION)**

Effective implementation of policies, particularly GPP, is pivotal for their success. Past research, notably by Pressman and Wildavsky, emphasised that policy outcomes hinge on implementation.<sup>34</sup> This notion has been echoed by many GPP policy analyses since then, highlighting the significant roles of organisational culture and coordination. Organisational culture encompasses shared values and behaviours within an organisation, while organisational coordination involves aligning activities and resources toward common objectives.

Recent research by Dimand emphasises that GPP adoption is not solely determined by environmental challenges or financial constraints but is shaped by organisational culture and coordination.<sup>35</sup> Recognizing the importance of these factors, there are a number of recommendations based on existing research that

---

should be considered to enhance GPP policy effectiveness, and Zero Waste Alliance Ireland emphasises the following recommendations are

- 1) establishing green procurement as an organisational priority;**

---

<sup>34</sup> Pressman, J.L. and Wildavsky, A. (1973), *Implementation*. University of CA Press, Berkeley, CA

<sup>35</sup> Dimand, A.M. (2022), "Determinants of local government innovation: the case of green public procurement in the United States", *International Journal of Public Sector Management*, Vol. 35 No. 5, pp. 584-602. <https://doi.org/10.1108/IJPSM-10-2021-0239>

- 2) encouraging effective leadership;
- 3) promoting positive perception; and,
- 4) facilitating the trial of new alternatives and the acceptance of change.

While each of these individual factors are of great importance in relation to the implementation of GPP, incorporating these factors together would have the best outcome for the policy's effectiveness.

## **7.1 Establishing Green Procurement as an Organisational Priority**

Prioritising green procurement within an organisation is paramount to the successful implementation of GPP policies, especially concerning the circular economy and waste reduction goals. Research by Wijayasundara (2022) underscores that organisations emphasizing green procurement actively engage in sustainable practices, aligning with the circular economy principles of resource efficiency and waste reduction.<sup>36</sup> These organisations demonstrate a heightened commitment to environmentally responsible purchasing, fostering a closed-loop system where products and materials are reused, remanufactured, or recycled, thus minimizing waste.

In contrast, entities neglecting to prioritise green procurement risk inadequate support and encouragement to adhere to eco-friendly purchasing guidelines, hindering progress toward circular economy objectives. Failure to communicate, mandate, document, or integrate green procurement as a fundamental organizational priority can relegate it to the sidelines in purchasing decisions, undermining the broader waste reduction and circular economy initiatives. A strategic approach that integrates green procurement into the organisational fabric, grounded in clearly communicated objectives, serves as a catalyst for transforming the purchasing process.

This transformative shift not only ensures compliance with GPP policies but also promotes a sustainable supply chain, encourages innovation in waste reduction

---

technologies, and fosters the development of eco-friendly products, driving the organisation closer to the circular economy ideals. Emphasising green procurement as a core organisational value thus becomes instrumental in

---

<sup>36</sup> Wijayasundara, M., & Polonsky, M., & Noel, W., & Vocino, A.,. (2022). Green procurement for a circular economy: What influences purchasing of products with recycled material and recovered content by public sector organisations. *Journal of Cleaner Production*. 377. 133917. 10.1016/j.jclepro.2022.133917.



creating a sustainable, circular economy-oriented procurement framework that effectively reduces waste and conserves resources.

## 7.2 Encouraging Leadership

Effective leadership plays a pivotal role in fostering innovation and driving the adoption of green procurement practices. Research by AlNuaimi et al. (2021) highlights the significant impact of leadership style in relation to organisational culture on promoting innovative thinking and green procurement activities<sup>37</sup>. Organisations that cultivate a culture of innovation and development demonstrate substantial progress in encouraging employees to embrace learning through trial and reflection, essential elements for advancing circular economy initiatives.<sup>38</sup>

Moreover, effective leadership extends to facilitating the adoption of GPP practices. Allocating time for public sector employees to familiarise themselves with GPP concepts is crucial, as familiarity has been found to correlate strongly with the level of GPP implementation within an organisation<sup>39</sup>. Studies by Roman (2017), Brammer and Walker (2011), and Testa et al. (2012) emphasize the importance of organizational culture and strategic leadership in driving a paradigm shift from traditional procurement processes to innovative approaches that consider the entire product life cycle.<sup>40</sup><sup>41</sup> <sup>43</sup> <sup>42</sup> This shift is vital for reducing waste, reusing and recycling materials, and considering environmental implications, emphasizing the importance of understanding GPP beyond political challenges or financial constraints.

---

<sup>37</sup> AlNuaimi, B.K., Singh, S.K., Harney, B., 2021. Unpacking the role of innovation capability: exploring the impact of leadership style on green procurement via a natural resource-based perspective. *J. Bus. Res.* 134, 78–88.

<sup>38</sup> Gormly, J., 2014. What are the challenges to sustainable procurement in commercial semistate bodies in Ireland? *J. Public Procure.* 14 (3), 395–445.

<sup>39</sup> Dimand, A.M. (2022), "Determinants of local government innovation: the case of green public procurement in the United States", *International Journal of Public Sector Management*, Vol. 35 No. 5, pp. 584-602. <https://doi.org/10.1108/IJPSM-10-2021-0239>

<sup>40</sup> Roman, A.V. (2017), "Institutionalizing sustainability: a structural equation model of sustainable procurement in US public agencies", *Journal of Cleaner Production*, Vol. 143, pp. 1048-1059.

<sup>41</sup> Brammer, S., Walker, H., 2011. Sustainable procurement in the public sector: an international comparative study. *Int. J. Oper. Prod. Manag.* 31 (4), 452–476.

<sup>42</sup> Testa, F., Annunziata, E., Iraldo, F. and Frey, M. (2016), "Drawbacks and opportunities of green public procurement: an effective tool for sustainable production", *Journal of Cleaner Production*, Vol. 112, pp. 1893-190.

The amalgamation of organizational coordination, leadership, and culture is pivotal in sustainable procurement practices, serving as the cornerstone for overcoming adoption barriers and promoting GPP within public agencies. Public managers, guided by these insights, should focus on raising awareness about GPP concepts and equipping employees with the necessary tools to implement green procurement effectively. This multifaceted approach ensures a strategic and innovative transition in procurement processes, embracing the circular economy ideals and significantly contributing to waste reduction efforts.

### **7.3 Promoting Positive Perceptions**

Perceptions regarding green/circular materials significantly influence the success of GPP policies and are integral to fostering a circular economy and substantially reducing waste. Research conducted by Grandia et al (2015) underscores the critical role of these perceptions in the evaluation of green products within organisations. This significance amplifies when products involve recycled materials or incorporate recovered content but are perceived as lower quality or potentially problematic.<sup>43</sup>

Take, for example, products containing recycled plastic, where variations in colour and aesthetics might occur between batches, leading to the impression of reduced quality. According to Wijayasundara (2022), negative or apprehensive perceptions surrounding green products can deter the consideration of environmentally friendly alternatives, impacting project outcomes in terms of appearance, performance, time, or cost. These individual perceptions profoundly influence the organisational acceptance of recycled materials or recovered content containing products, highlighting the importance of addressing and positively shaping these perceptions.<sup>44</sup> Cultivating positive attitudes towards sustainable and circular-focused materials is essential.

Public awareness campaigns, educational initiatives, and clear communication about the benefits of these materials not only enhance the acceptance of green products within organisations but also contribute significantly to the circular economy objectives by promoting the use of recycled materials and minimising waste generation. Creating a positive perception of these materials is, therefore, crucial for the successful implementation of GPP policies, encouraging the

---

<sup>43</sup> Grandia, J., Steijn, B., Kuipers, B., 2015. It is not easy being green: increasing sustainable public procurement behaviour. *Innovat. Eur. J. Soc. Sci. Res.* 28 (3), 243–260.

<sup>44</sup> Wijayasundara, M., & Polonsky, M., & Noel, W., & Vocino, A.,. (2022). Green procurement for a circular economy: What influences purchasing of products with recycled material and recovered content by public sector organisations. *Journal of Cleaner Production.* 377. 133917. 10.1016/j.jclepro.2022.133917.

---

widespread adoption of eco-friendly products, and fostering a circular economy that prioritises sustainability and waste reduction.

## **7.4 Facilitating the Trial of New Alternatives and Acceptance of Change**

Embracing innovation and change is another key factor of GPP effectiveness in transition towards the circular economy and minimising waste, particularly within local government organisations (LGOs). Research has highlighted the inherent risk aversion among LGOs, particularly regarding GPP initiatives. Resistance to altering established practices, especially among long-tenured employees, poses a significant barrier to the adoption of green procurement. Organisational stagnation often results from low employee turnover, limiting the capacity for change and innovation within these organisations. Public employees may also grapple with ethical dilemmas related to spending public funds on testing new environmental alternatives, hindering the trial of green practices.

To overcome these challenges, it is essential to bridge the "*intention-behaviour gap*" at the individual level, emphasising the need for external evidence showcasing the benefits of green procurement practices, including improvements in time, performance, and costs. Moreover, fostering a culture that encourages innovation, learning, and knowledge-sharing is instrumental. LGOs can incentivise innovation and trials, build confidence through capacity-building initiatives, and establish peer networks and resources for discussing and reviewing experiences. Encouraging a proactive approach to embracing new practices and technologies can empower employees to become advocates for green alternatives.

Additionally, promoting confidence in green procurement choices necessitates breaking away from the reliance on external recommendations. By empowering employees with knowledge and providing them with the tools to assess and experiment with sustainable alternatives, LGOs can cultivate an internal culture of innovation. This shift towards an empowered, informed, and innovative organisational culture in public agencies not only accelerates the acceptance of products containing recycled materials or recovered content but also facilitates the seamless integration of circular economy principles. Emphasising continuous learning, sharing best practices, and nurturing a supportive environment are essential steps in transforming risk-averse organisational cultures into catalysts for sustainable change and waste reduction, ultimately enhancing the effectiveness of GPP policies.

## **7.5 Coordinate Objectives**

By aligning objectives toward the increased utilisation of products containing recycled materials or recovered content, public sector organisations can set specific yearly targets, functional objectives, and revised job roles that incentivise the adoption of green procurement practices. This targeted coordination not only rewards progress but also fosters a culture of sustainability within the organisation. Moreover, robust organisational coordination within the procurement process is vital.

Evidence-based decision-making, supported by well-coordinated efforts, ensures the informed selection of products containing recycled materials or recovered content. Considering the interdependency of various decision-making stages, it becomes crucial for all members of the public procurement centre to comprehend the assessed value across functional areas, emphasising product evaluations that encompass the entire lifecycle. This comprehensive perspective allows public sector and other organisations to evaluate the true environmental impact, durability, and recyclability of products, aligning procurement choices with circular economy principles.

Enhancing organisational coordination involves fostering collaboration among different departments, suppliers, and stakeholders. Streamlining communication channels, sharing best practices, and promoting knowledge exchange can facilitate a seamless flow of information.

Additionally, regular training programs and awareness initiatives can empower employees with the necessary skills and understanding of sustainable procurement practices, reinforcing the organisation's commitment to waste reduction and circular economy goals. By promoting such coordinated efforts and ensuring that all stakeholders are aligned with the overarching objectives of GPP policies, organisations can effectively contribute to the circular economy. This collaborative approach not only strengthens the implementation of green procurement practices but also serves as a cornerstone for minimising waste, conserving resources, and fostering a sustainable future.

## **7.6 Targets and Goals**

### **7.6.1 Clear Goals and Specific Criteria**

The targets and goals established for a GPP policy are another significant determination of its effectiveness. Research conducted in southeast Asia by Wang et al. (2020) highlights the pivotal role of explicit goals and specific criteria

in ensuring the successful implementation of GPP initiatives. Policies characterised by clear objectives and well-defined criteria facilitate a robust implementation process, ensuring that the efforts of local entities align seamlessly with broader sustainability objectives. In contrast, vague or ambiguous targets lead to confusion in practice, adversely affecting the effectiveness of GPP policies. Unclear goals introduce uncertainty, fostering opportunistic behaviour among stakeholders, which undermines the core principles of sustainability. Moreover, ambiguity in goals amplifies complexity and raises the costs associated with monitoring and controlling procurement activities.<sup>45</sup> Such challenges hinder the smooth progression toward circular economy practices, making it imperative to establish unambiguous and consistent policy objectives.

It is recommended that in order to improve GPP performance, the government should strengthen the goals of GPP and finetune the implementation standards to make the policy goals clear, consistent, and more operational. Specifically, the central government should unify and strengthen the policy goals of GPP programs with all the necessary accessory policies and assign uniform weights to add to the green products and services for bidding evaluation (Wang et al (2020)). By emphasizing explicit and precise objectives within GPP policies, governments can pave the way for a more sustainable future, promoting the efficient use of resources and minimizing environmental impact.

### **7.6.2 Target Setting**

Implementing a dual-focused strategy in target setting is crucial for advancing sustainable procurement practices and contributing significantly to the circular economy and waste reduction goals. Firstly, enforcing mandatory benchmarks ensures that tenders meet established minimum standards, thereby stimulating the adoption of eco-friendly practices. These standards, set at the product level, should encompass recommended maximum acceptable limits for global warming potential. This approach advocates for a comprehensive cradle-to-grave analysis

---

within the life cycle assessment, accounting for the environmental impact of end-of-life disposal and integrating material recycling and (re)utilization efforts.

Concurrently, integrating performance criteria at the project level constitutes the second prong of this strategy. Establishing project-specific performance targets in bid evaluations allows preference to be given to tenderers surpassing the mandatory minimum standards. To ensure the effectiveness of this approach,

---

<sup>45</sup> Wang, C., Qiao, Y. and Li, X. (2020), "A systems approach for green public procurement implementation", *Journal of Public Procurement*, Vol. 20 No. 3, pp. 287-311.  
<https://doi.org/10.1108/JOPP-03-2019-0017>

these criteria should carry significant weight in the decision-making process, surpassing other factors such as price. This incentivises bidders to strive for excellence, fostering a culture of innovation and sustainable practices within procurement processes. Additionally, this two-pronged approach must be complemented by periodic revisions of targets, preferably every two to three years, aligning with carbon commitments and circular economy objectives.

By adopting this strategic approach, organisations not only encourage the widespread adoption of green practices but also nurture a competitive environment that promotes innovation. Furthermore, revising targets periodically ensures that the procurement processes stay aligned with evolving sustainability goals, contributing substantially to waste reduction and the development of a circular economy. This comprehensive strategy reinforces the commitment to a sustainable future, fostering a procurement culture that emphasises responsible resource use and environmental stewardship.

The following two sections elaborate on project-level targets and product-level targets.

### **7.6.3 Project-level Targets**

Unlike product-level requirements, project-level targets assess the overall environmental impact of a project, ensuring a holistic approach that considers the entire lifecycle of products, services, or infrastructure projects. This comprehensive evaluation, ranging from resource use and energy consumption to waste generation, allows for a nuanced understanding of environmental impacts.

Project-level analyses provide significant flexibility by allowing the use of lowcarbon alternative materials and promoting emission reductions across various project aspects, including waste management. Unlike product-specific targets, project-level targets avoid favouring certain materials, ensuring fair evaluations and preventing the undue advantage of substitutes that may not be as durable. Moreover, project-level targets facilitate cross-industry comparisons and empower designers to make informed decisions considering cost, embodied emissions, and material durability.

A notable example of successful implementation is seen in the Netherlands, where project-level environmental assessments are incorporated into bid evaluations using tools like DuboCalc. This software employs life cycle analysis to assess environmental impacts, converting them into a monetary value that influences bidding prices. By encouraging the efficient use of materials, modular construction techniques, and end-of-life recycling options, these project-level

targets address systematic issues within industries, crucial for transitioning towards a circular economy.

While product-level targets may evaluate specific items, they fall short in considering the cumulative impact of products used in a project, leading to incomplete assessments. In contrast, project-level targets provide a comprehensive understanding of environmental consequences, making them indispensable for GPP policies aiming to reduce waste and promote circular economy practices. By adopting project-level targets, organizations can significantly contribute to a sustainable future, fostering responsible resource use, minimizing waste, and advancing the circular economy agenda.

#### **7.6.4 Product Level Targets**

These targets, though requiring meticulous research into industry standards, are highly specific and often expressed as quantitative values. Currently centred on fostering circular economy principles and emission reduction, product-level targets employ two primary evaluation methods: Environmental Product Declarations (EPD) and recycled content evaluations. EPDs, used in countries like Japan and the Netherlands, offer transparent and comparable information about a product or service's environmental performance. They account for waste materials, ensuring that global warming potential is influenced by recycled content, thus promoting material recirculation and reutilisation. Recycled content evaluations, on the other hand, provide insights into a product's circularity, focusing on material reclamation and longevity.

An amalgamation of EPDs and recycled content evaluations emerges as the most effective strategy, incorporating essential dimensions of the circular economy into procurement decisions. This combined approach evaluates both sourcing materials and the overall environmental footprint of a product, ensuring a holistic understanding of its sustainability. By giving preference to products with high recycled content, GPP policies drive manufacturers to incorporate recycled materials, promoting resource efficiency and reducing the demand for virgin resources.

Setting product-level targets that integrate both EPDs and recycled content evaluations establishes a clear market demand for environmentally sustainable products. This demand fuels innovation among manufacturers, encouraging the development of eco-friendly products and processes. It fosters a competitive environment where companies enhance their environmental performance to meet EPD and recycled content criteria. This amalgamation ensures transparency in the procurement process, enabling buyers to make informed decisions based on both environmental impact and circular economy considerations. Such informed decision-making is fundamental to GPP policies' objectives. By amalgamating

EPDs and recycled content evaluations in product level targets, public authorities exhibit environmental leadership. This approach sets a positive example, encouraging widespread adoption of circular economy practices and emphasizing the importance of environmentally responsible procurement strategies.

As such, integrating an amalgamation of Environmental Product Declarations and recycled content evaluations into product-level targets significantly enhances the effectiveness of Green Public Procurement policies. This approach not only promotes the circular economy and encourages innovation but also conserves resources, ensures transparency, and positions public authorities as environmental leaders, contributing significantly to sustainable development goals.

## **7.7 Public Green Procurement as Consumer Choice, where “Consumers” are Public Agencies**

In the dynamic landscape of consumer choices, even where the “consumers” of goods and services are public agencies, or are acting on behalf of the public, the traditional mode of choice between quality, price, and environmental impact has undergone a significant evolution. The contemporary marketplace now includes an emerging paradigm shift that mandates a more conscientious and holistic approach to decision-making when procuring goods and services.

The urgency of environmental challenges, from climate change to resource depletion and destruction of biodiversity, requires a critical re-evaluation of consumer priorities. The traditional approach that leaned heavily on cost effectiveness and product performance must now join up with a commitment to environmental sustainability. This demands a recalibration of values, with an amplified emphasis on reducing our collective carbon footprint, minimising resource depletion, avoiding waste, and mitigating climate change.

By expanding the evaluation metrics beyond the customary considerations of quality and price, the inclusion of material recirculation, recycling, re-using, repairing, (re)utilization, and product longevity establishes a more comprehensive assessment framework. It offers consumers and businesses a lens through which to view products and services not merely as isolated entities but as integral components of a sustainable ecosystem.

Prioritizing minimal environmental impact amid the traditional benchmarks of quality and price does more than just address immediate consumer needs. It should accomplish a transformative era of green consumer culture, where sustainability, ethical consumption, and environmental consciousness intersect



and balance harmoniously. This shift holds the potential to significantly influence the choices made in the marketplace, compelling manufacturers and service providers to adopt more eco-friendly practices and thereby catalyse a paradigm shift toward sustainability.

In embracing 'green' considerations as a priority, public agencies in their role as consumers and procurers of goods and services should not only be making individual choices but should also be actively participating in a global movement towards a more sustainable and environmentally conscious future. The significance of these choices extends beyond immediate consumption, impacting supply chains, shaping corporate practices, and influencing industry standards.

As we navigate this juncture of change, this shift in consumer priorities isn't just a trend; it's a fundamental transformation in the way we perceive products and services. It's a step towards a future where ethical consumption and environmental stewardship become foundational pillars of our societal norms.

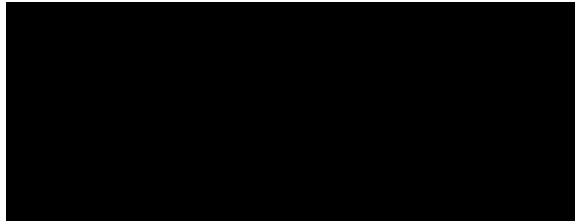
By integrating environmental sustainability as a fundamental criterion alongside quality and price considerations, consumers and businesses alike contribute to a more conscientious, ecologically aware marketplace. This commitment to prioritising minimal environmental impact is a pathway towards a sustainable and harmonious relationship between human activities and the planet. It stands as a testament to our collective responsibility to build a future where consumer choices resonate with long-term ecological health, contributing to a world where sustainable practices are the norm, not the exception.

## **8. CONCLUSION**

The Department's draft Green Public Procurement Strategy and Action Plan, 2023 to 2027, is in many ways an excellent document, pointing to the type of purchasing by state agencies and local authorities of goods and services in the best possible way, taking into account social and environmental issues and consequences.

Nevertheless, Zero Waste Alliance Ireland would like to see a more strategic green public procurement policy, in which GPP would make an important contribution to national and international sustainability goals, to reduce or eliminate waste (including the wasting of water), and to accelerate the transition to a more circular economy where materials remain in use for longer.

It is also a key element of our submission that Green Public Procurement of materials, goods and services, together with waste prevention and achievement of the Circular Economy must be implemented as part of over-arching, integrated and comprehensive whole-of-Government sustainability, environmental, climate action and social policies; and we urge the Government to take this holistic approach.



### **Zero Waste Alliance Ireland**

This submission was researched and written by [REDACTED] (ZWAI member and director), [REDACTED] (ZWAI member), [REDACTED] (ZWAI member), and [REDACTED] (ZWAI founder member and director), and was edited by [REDACTED] (ZWAI administrator and researcher), and [REDACTED].

17 November 2023