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To: [DECC GPP](#)
Subject: daa Submission to Draft Green Public Procurement Strategy and Action Plan
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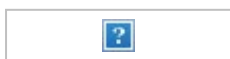
Good afternoon,

Please find attached a submission on behalf of daa on the Draft Green Public Procurement Strategy and Action Plan.

Please do not hesitate to contact me if you require any additional information.

Kind regards,

[REDACTED]
Corporate Affairs Lead



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teachtaireacht, an ceangaltá(i)n nó cuid ar bith dó a úsáid, a nochtadh, a chóipeáil, a scaipeadh nó a choinneáil. Má chreideann tú go bhfuair tú an ríomhphost seo trí earráid, bheimis buíoch dá gcuirfeá é sin in iúl dúinn láithreach. Scrios gach cóip den ríomhphost seo agus ceangaltá(i)n ar bith ó chóras do ríomhaire chomh maith le do thoil. Mura bhfuil sé luaite go sainráite, níl sé beartaithe leis an ríomhphost seo caidreamh conarthach ar bith a chruthú. Murar seoladh an ríomhphost seo i gcúrsaí fhostaíocht an tseoltóra nó i gcomhlíonadh a dhualgas/a dualgas ní ghlacfaidh daa dliteanas ar bith as ábhar na teachtaireachta nó ceangaltá(i)n ar bith. daa cpt. Oifig Chláraithe: Aerfort Bhaile Átha Cliath, Co. Bhaile Átha Cliath. Uimhir Chláraithe: 9401 Éire.

daa Submission to Draft Green Public Procurement Strategy and Action Plan

Thank you for the opportunity to provide a submission to the Draft Green Public Procurement Strategy and Action Plan. We welcome the publication of the draft strategy and have included our response to the suggested public consultation questions below.

1. Do you think the approach as detailed in the draft Green Public Procurement Strategy and Action Plan will significantly increase Green Public Procurement across the Public Sector?

The Strategy and Actions are well set out. However, they focus on the public sector only, leaving commercial semi-states (CSS) in limbo. Our suggestion would be to expand this Strategy to include Commercial Semi-states and their Irish subsidiaries.

Under Action 55 for the Climate Action Plan, the Department of Public Expenditure and Reform (DPER) and New ERA with the Department of the Environment, Climate and Communications (DECC) developed the Climate Action Framework for the CSS to address climate action objectives. The Framework is a series of five commitments by the CSS companies in relation to their climate action objectives, with commitment four dedicated to circular economy and green procurement. As all CSS have signed up to this framework, we believe this strategy should extend to the CSS to allow for a harmonised approach across the public sector and CSS in delivering green procurement actions.

2. Are there any other key aspects or actions that could be effective in implementing Green Public Procurement and that you think should be considered for inclusion in the Green Public Procurement Strategy and Action Plan?

We believe that Action 10, Monitor the progress of GPP implementation by the Commercial Semi Sector is not strong enough. The Climate Action Framework does not provide actions or details for the CSS. A clear pathway with actions and targets is needed for the CSS and this Strategy can provide the legislation for CSS to get the buy-in needed to undertake these actions. Additionally, CSS are required to submit their climate action progress to the SEAI Monitoring and Reporting (M&R) scheme annually to track progress against Government targets of 50% improvement in energy efficiency and 51% reduction in carbon emissions. At a recent meeting with NewERA and SEAI, SEAI noted changes to the M&R scheme that will include the monitoring and reporting of green procurement. If CSS are not included in this Strategy, achieving these changes will be difficult.

3. In terms of the sectoral/product targets included in the draft Green Public Procurement Strategy and Action Plan, do you have any views in relation to the targets, the ambition level, and a timeframe for target achievement?

We welcome the targets being put forward for each sector of the EPA guidance and would like to see these targets and ambitions extended to the CSS.

4. Are there any other sectoral/product targets related to Green Public Procurement that you think should be considered for inclusion in the Green Public Procurement Strategy and Action Plan?

We welcome the targets being put forward for each sector of the EPA guidance. We would like to see the development of GPP criteria for professional services. The guidance available to date is heavily focused on goods but we would like to see that expended to cover services, particularly professional services.

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

While training is covered in the strategy, we believe there is a reluctance to apply specific green procurement scoring due to a concern that legal action can be taken by suppliers over tender results. We would welcome guidance through this strategy on the level of training or knowledge a staff member must have before they can be considered suitable to write and score green procurement criteria in tenders. We would like to see minimum criteria and guidance for staff to develop and score GPP.

We would welcome more information published regarding OGP's central role in leading on further development of the GPP toolkit, OGP's responsibilities and qualifications in the area of sustainability, and GPP (reference to SLAs would be beneficial) to respond to queries through the online tool for GPP Criteria. We would also like more information on the proposal to utilise new eForms submissions for OJEU tenders to report on GPP as this will leave a gap in terms of those projects which fall below the value thresholds. Also, eForms were not covered in the eTenders tool training suite (only an update posted on the OGP website) which was undertaken by staff prior to Go Live.

It would be beneficial if a dedicated GPP line of communication was established separate to the normal OGP comms channels to provide the emphasis and importance required for such updates and communications. In general, if OGP are to be central in rolling out aspects of the Action Plan then visibility into their expertise in the area would be beneficial (i.e. is there a dedicated GPP department in place or is the reliance on external consulting/other government departments?)

Further information regarding ongoing training commitment and ongoing development of training is required. While it is stated that over 200 procurers have been trained across 100 organisations, this represents only two persons per org with no detailed information on future iterations (training new joiners etc.) or upskilling where required.

Please do not hesitate to contact me if you would like to discuss any of the points raised in our submission.