From:

To:

DECC GPP

Subject: Public Consultation on the Draft Green Public Procurement Strategy and Action Plan

Date: Friday 17 November 2023 11:54:04

Attachments: Darwin Goliath GPP Strategy Response.pdf

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Good morning,

Please find the attached response to the Public Consultation on the Draft Green Public Procurement Strategy and Action Plan on behalf of Darwin and Goliath Limited.

We are fully supportive of the efforts put into this document and are delighted to see a focus being placed by the public sector to leverage spending power to help society move in the direction required.

Thank you for your service.





Draft Green Public Procurement Strategy and Action Plan Public Consultation Questions

Template for Responses

No.	Question
1	Do you think the approach as detailed in the draft Green Public Procurement Strategy and Action Plan will significantly increase Green Public Procurement across the Public Sector?
Response:	A. The needs assessment on page 27 (and diagram on page 30) are a solid foundation but it is recommended to add additional details for this process and make a stronger commitment to addressing this fundamental part of procurement.
	The current wording states: Consideration should be given to: - Avoiding unnecessary purchases - Re-thinking how the demand can be met in a way that requires fewer or better value goods to be purchased Considering resource sharing or reuse options - Building flexibility into contracts and frameworks so that the nature and volume of supply best reflects changing and future needs
	It is recommended to add a more focused approached in words you deem pertinent, along the lines of:
	NEEDS ASSESSMENT PROCESS:
	1. Do we need to purchase? Are we sure we need to purchase?
	2. Can we repair something?
	3. Can we reuse something in our department or another department?
	4. Can we purchase recycled or 2 nd hand products for this? (If not, is there
	regulatory friction and can we request changes?)
	5. If we must purchase a new product, is a more sustainable version available
	than previous orders?
	6. Should a new product with XXX emissions really be made of this product or
	do alternative solutions exist to solve this problem?
	7. Instead of purchasing a product can a different business model relationship
	solve the problem, such as leasing the product and having the supplier
	maintain the product to ensure the Life-Cycle costing models (referenced on page 52) are considered properly?
	8. Place a tender to buy the item(s) or service(s)

	B. The life-cycle costing method from page 52 should be highlighted more often throughout the document in the opening and in the actions it should be referenced multiple times as a goal and a point of consideration at all levels. It may not always be possible to know the life-cycle cost but just getting people to think about it and consider it is very important.
2	Are there any other key aspects or actions that could be effective in implementing Green Public Procurement and that you think should be considered for inclusion in the Green Public Procurement Strategy and Action Plan?
Response:	1. Page 19, The BOX 1 2023 Public Sector Climate Action Mandate GPP focus has not been disseminated well across public authority staff to be common knowledge through the councils and across the country in state and semi-state bodies beyond procurement specific roles. It is recommended to add a commitment to the budget to provide funding to ensure these specific requirements are communicated regularly from the executive level throughout all levels of government. There is a lot to absorb in the GPP, but these specific initiatives are actionable now without as much ambiguity as the circular economy models. While this is quite a challenge as procurement has not quite been recognized nationally as a key to addressing climate change, as stated clearly in this document it is quite clear that GPP is one of the most impactful and efficient methods to enact real change in the public and private sector. Please request a sizeable budget to make these specific requirements better known throughout the country as many officials that make these decisions are not in procurement specific roles. This should include training and public messaging to elevate GPP in the public consciousness as a way government can help society evolve rapidly. At the least, it is worth re-refering the BOX on page 19 in the 9.2 Actions on page 55. It might seem like this is too specific for these general actions, but that is precisely the point. Specific action is needed and these reduce impact now, where as 'general GPP training' is of course needed, these specific ones are worth highlighting.

	2. Actions 4.4 on page 24/25 or on page 12.1 actions on page 61 or both. Suggest to add another item: OGP to engage with academic researchers and innovative private industry partners on ways to enhance the GPP Criteria Search Tool and process and provide an OPEN API to work within the data that can be made available publicly. There are plenty of researchers, company spinouts, startups and private industry organisations that would come together and help improve the Search Tool. Cutting edge innovation is required and the tool is a great step in the right direction, but it could use innovators helping to find ways to improve it, and an open API would be a great way to engage with those innovators (we are a Trinity College spinout form the ADAPT CENTRE innovation lab for instance and we could help spread it to many other groups interested in this realm). The government can't be expected to solve this problem alone and providing this tool in a more open fashion will encourage more innovation in this realm.
3	In terms of the sectoral/product targets included in the draft Green Public Procurement Strategy and Action Plan, do you have any views in relation to the targets, the ambition level, and a timeframe for target achievement?
Response:	
4	Are there any other sectoral/product targets related to Green Public Procurement that you think should be considered for inclusion in the Green Public Procurement Strategy and Action Plan?
Response:	

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