

**From:** [REDACTED]  
**To:** [DECC GPP](#)  
**Subject:** Response to the Draft Green Public Procurement Strategy and Action Plan  
**Date:** Friday 17 November 2023 17:38:10  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[DraftGreenPublicProcurementStrategyandActionPlanPublicConsultation\\_UCC\\_response.docx](#)

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To whom it may concern,

Please find attached UCC Procurement's comments in respect of the draft document.

Kind regards,

[REDACTED]

[REDACTED]

**Procurement Officer | Procurement and Contracts | 6 Elderwood | College Road | University  
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## Draft Green Public Procurement Strategy and Action Plan Public Consultation Questions

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:	<p>The approach is a very comprehensive and welcome update to the current policy documents on GPP. We are concerned that the strategy and action plan may not go far enough to instigate the change required to meet our legally binding targets by 2030. When the 20/2019 circular was published there was an instruction to public authorities to consider to use green public procurement where possible and an expectation that GPP would become mandatory from 2023. The GPP Mandate only requires GPP to be used across all public bodies from 2025. This a missed opportunity to build momentum on GPP from the end of this year. It would be good to see this reconsidered for 2024 as the change has already been flagged and expected.</p>
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	<p>The main obstacle to implementing GPP is persuading practitioners that it can easily be done. There is a perception that you have to have a wealth of knowledge to be able to use GPP and fear associated with evaluating information they are not familiar with. The EPA has already provided a fantastic resource in the form for the GPP Guidance for Public Sector which is a brilliant starting point for all practitioners. That's also been supplemented by the OGP's GPP criteria search tool. However, this needs to be supported with a dedicated Irish helpdesk with resources who are experts in sustainable procurement to help decipher some of the material out there that can be confusing and ever-changing. While the EU have their own helpdesk, it would be great to see a similar resource rolled out here in Ireland.</p> <p>Furthermore, the action to deliver sectoral specific training is welcome but it must be ongoing and refreshed regularly as standards and tools keep changing in this space and it's not enough to just do one course.</p> <p>No specific actions mentioned on carbon footprints or the use of standardised tools for this. Again, this should be considered if scope 3 emissions are to be truly tackled.</p> <p>Please also refer to our recently published academic article:</p> <p><i>Greening procurement: Exploring evolving practices in an Irish university.</i></p>

	<a href="https://authors.elsevier.com/sd/article/S2405-8440(23)08995-8">https://authors.elsevier.com/sd/article/S2405-8440(23)08995-8</a>
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	<p>Action A4 “By end of 2024, OGP to amend Goods and Services template RFTs and template contracts to increase awareness, where relevant, of the option to include GPP selection and award criteria and technical specifications, and associated contract performance clauses.” – Far to weak text e.g. “option to include”.</p> <p>Pg. 26 :  “Typically, at least 5% of the award marks could be allocated to GPP award criteria: rising to 10% should the project, for example, have the potential of securing significant GHG emission reductions and improved energy efficiency performance.” – Again not ambitious enough, we are seeing up to 20% awarded and this is also the case in international best practice examples.  Carbon Footprint could be included in selection criteria – at the very least scope 1&amp;2.</p> <p>Pg 28 : If there are international best practices available in areas where national gpp criteria exist, could these be used? I.e. if they go beyond what is included in national criteria?</p> <p>Buildings – could specify use of low carbon analysis software, embodied carbon and appointment of sustainability coordinator for large capital projects. Measures are needed to ensure overordering of construction materials onsite is minimised and any materials overordered are disposed of correctly.</p> <p>Food – Need to include carbon footprint analysis of food products.</p> <p>Textiles – should be target to move away from polyester fibre products and to organic cotton and other natural materials with lower environmental impact. I know this is green procurement but we can’t talk about clothing without supply chain and modern slavery included. Carbon footprint of transport of clothing should be included.</p> <p>Paper – the specific target needs to refer to sustainable certification as well as recycled content.</p> <p>Cleaning – The target here on training is very weak. All cleaning suppliers do this now. There should be more specifics on minimum criteria on water, chemicals and packaging consumption in cleaning services.</p> <p>Wording in 10.5 is far too weak, reporting on GPP should be made mandatory asap.</p>

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	Overall, a strong document but like to see it go further to effect real change.