



21 July 2025

To Heads of Departments

Circular 17/2025: Updated Green Public Procurement Instructions for Public Sector Bodies

A Dhuine Uasail,

Buying Greener: Green Public Procurement Strategy and Action Plan 2024-2027 (*Buying Greener*) sets out new Green Public Procurement (GPP) obligations¹.

The purpose of this Circular is to provide updated instructions to government departments and the public sector regarding 11 of the 54 actions included in *Buying Greener*. These 11 actions are listed below at section **2. GPP Actions**. Some of these actions have been amended to reflect developments since the publication of *Buying Greener*.

This Circular replaces Circular 20/2019: Promoting the use of Environmental and Social Considerations in Public Procurement.

Unless otherwise stated, all actions take effect from the date of publication of this Circular. This Circular applies to all public sector bodies. Measures relating to updated reporting requirements are only applicable to specific public sector bodies.

Contracting authorities are reminded that there are further GPP obligations for public buyers originating from other sources (including the Public Sector Climate Action Mandate and national and EU legislation).

A 12-month impact assessment will be undertaken to review the impact of the Circular on SMEs.

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Anne Stewart
Assistant Secretary
Office of Government Procurement

¹ These obligations include 54 actions and 12 targets for key sectors and product categories. This circular provides updated instructions on the 11 actions which apply to all public bodies.



1. Green Public Procurement

Green Public Procurement (GPP) is defined as a process whereby public bodies 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 procured².

Each stage in the procurement process offers opportunities to take green issues into account. GPP criteria can be included in the procurement process when defining the subject matter of the contract, in exclusion grounds and selection criteria, as technical specifications, as qualitative award criteria, in the application of life-cycle costing and in contract performance clauses. Once a decision has been taken by a contracting authority to include GPP criteria, this should be clearly signalled at all stages of the procurement process from business case and specification stages through to the selection, award and contract management stages.

In accordance with the GPP Implementation Mandate set out in *Buying Greener*³, contracting authorities that are procuring goods, services or works for which national GPP guidance and criteria⁴ are available **must** include GPP criteria from such guidance, where appropriate and proportionate. Where national GPP criteria are not available, contracting authorities should consider using GPP criteria from other sources (for example, EU GPP criteria), best practices available from other countries, or using existing guidance to incorporate sustainability into specific procurement projects.

At all times, when considering the application of GPP criteria, contracting authorities should observe the following five general principles of EU law:

- Equal Treatment
- Non-Discrimination
- Proportionality
- Transparency
- Mutual Recognition

In addition, any GPP criteria must be linked to the subject matter of the contract.

Public sector bodies are encouraged to refer to the Environmental Protection Agency's (EPA) GPP Guidance and Criteria⁵ and utilise the Office of Government Procurement's (OGP) online GPP Criteria Search⁶, which facilitates ease of use of the national GPP criteria published by the EPA. GPP Criteria Search allows users to find, select and download relevant criteria for specific procurements, along with an appropriate method of verification, for a wide range of products, services and works.

² Communication from the European Commission, Public Procurement for a Better Environment, COM (2008), July 2008.

³ For further information on the GPP Implementation Mandate please refer to *Buying Greener: Green Public Procurement Strategy and Action Plan 2024-2027*

⁴ EPA GPP Guidance and Criteria can be found on the [EPA website](#)

⁵ EPA GPP Guidance and Criteria can be found on the [EPA website](#)

⁶ GPP Criteria Search can be accessed by visiting <https://gppcriteria.gov.ie/>



2. GPP Actions

2.1 Corporate Procurement Plans

2.1.1 All public sector bodies in updating their corporate policies and strategies, and Corporate Procurement Plans are to set out how they will adhere to *Buying Greener* obligations related to their organisation⁷.

2.1.2 All public sector bodies to actively promote the use of GPP Criteria Search within their organisations and include this commitment in their Corporate Procurement Plans.

2.2 Accelerating GPP Implementation

For all tenders above the applicable national advertising thresholds⁸, all public sector bodies to include GPP criteria in all tender documents, where possible, in accordance with the GPP Implementation Mandate set out in *Buying Greener*.

2.3 The Built Environment

2.3.1 In line with the Public Sector Climate Action Mandate all public bodies shall specify low carbon construction methods and low carbon cement material as far as practicable for directly procured or supported construction projects.

From 2026, public bodies must include specifications for low carbon construction related components and sustainable building processes in accordance with the Energy Performance of Buildings Directive, using Construction Products Regulation data where available and EN 15978:2011 Sustainability of construction works (EN 15978), and reference to GPP criteria related to construction, including National GPP guidance, where appropriate in the Preliminary Project Brief. In addition, whole life-cycle analysis in accordance with EN 15978, where appropriate, shall be used to inform the design of building projects over 1,000 m² to ensure life-cycle Global Warming Potential is optimised at the building level and to facilitate declarations of embodied carbon for inclusion in the Building Energy Rating/Energy Performance Certificate of buildings completed after 31 December 2027.

2.3.2 Whole life-cycle costing to be used by all public sector bodies for all works contracts as defined by the Capital Works Management Framework.

2.3.3 For the procurement of low carbon cement material, public sector bodies and beneficiaries of grant (Exchequer) funding should implement construction related technical guidance that has been developed by the Department of Enterprise, Tourism and Employment and is available on their website⁹.

2.4 GPP Training and Awareness

All public sector bodies to set out (for example, within public sector Climate Action roadmaps and Corporate Procurement Plans) and fulfil annual staff training commitments in relation to GPP with a priority focus on key goods/services/works applicable to those organisations.

⁷ The OGP have issued an Information note on Corporate Procurement Plans. Please refer to the [OGP website](#)

⁸ For further information on applicable thresholds please refer to the [OGP website](#)

⁹ Further information on the technical guidance can be found on the Department of Enterprise, Tourism and Employment [website](#)



2.5 GPP Monitoring and Reporting

Updated reporting requirements to the EPA

2.5.1 Government departments to capture data in their annual report to the EPA regarding tenders awarded to social enterprises, voluntary and community organisations where GPP criteria have been applied. This reporting requirement will be due for submission to the EPA in 2026 and will cover the period from 1 January 2025 – 31 December 2025 and annually thereafter.

2.5.2 All government departments to report in the annual report to the EPA on GPP implementation in relation to contracts valued over the applicable national advertising thresholds, including explanation for not including GPP criteria in published tender documentation where national GPP criteria are available. This reporting requirement will be due for submission to the EPA in 2026 and will cover the period from 1 January 2025 – 31 December 2025 and annually thereafter.

The EPA will provide guidance and a template on an annual basis to fulfil these reporting requirements.

Updated reporting requirements to the Sustainable Energy Authority of Ireland (SEAI)

2.5.3 All public sector bodies subject to the Public Sector Climate Action Mandate to report explanation in the SEAI Monitoring and Reporting system for not including GPP criteria in published tender documentation for contracts valued over the applicable national advertising thresholds where national GPP criteria are available. This reporting requirement will be due for submission to the SEAI in 2026 and will cover the period from 1 January 2025 – 31 December 2025 and annually thereafter.

eForms

2.5.4 All public sector bodies must publish information on the use of GPP in individual competitions in procurement notices (eForms).

3. Impact on SMEs

The Government is committed to facilitating the participation of SMEs in public procurement. Therefore, when implementing GPP public sector bodies are encouraged to pay particular consideration to any potential impact on SMEs, as there may be additional costs associated with the inclusion of GPP in public contracts. Care should be taken to ensure that the addition of GPP criteria and conditions, including reporting and monitoring requirements, is done in a manner that does not discourage SMEs as they may not be in a position to bear the additional costs or administrative burden.

Market engagement can help create the market conditions needed to deliver sustainable and innovative solutions. Public sector bodies are encouraged to consider undertaking preliminary market consultations prior to tendering in order to better understand matters, including the capacity of the market to deliver the sustainable solutions, both in terms of maturity and technical ability. Desired environmental outcomes should be included in market consultation.

For above EU threshold contracts, public sector bodies may wish to consider the publication of a Prior Information Notice on the eTenders website setting out their intentions with respect to planned procurements and the inclusion of GPP criteria. Communicating long-term procurement plans to the market gives the market time to react and develop environmental solutions.



4. Life-Cycle Costing

S.I. 284/2016 - European Union (Award of Public Authority Contracts) Regulations (the Procurement Regulations) provides that a contract shall be awarded on the basis of the most economically advantageous tender (MEAT). Contracting authorities, to the extent relevant, should take into account not just the acquisition costs but the whole life-cycle costs. This allows contracting authorities to take account of various elements relating to the subject-matter of the contract. Life-cycle costing can include costs borne by the contracting authority or other users and costs imputed to environmental externalities linked to the product, service or works during its life-cycle, provided their monetary value can be determined and verified. Where appropriate, contracting authorities should seek full life-cycle costing solutions in their tender documents. The extent of information sought should always be related to the good, service or work being procured.

5. Use of Central Purchasing Arrangements

The Office of Government Procurement and its sector partners in Education, Health and Local Government, have established a range of centralised procurement arrangements from which goods and services can be procured. Public sector bodies are reminded that it is government policy that public sector bodies, where possible, should make use of all such centralised procurement arrangements. In line with *Buying Greener*, all future central purchasing arrangements published shall include contract specific GPP criteria, where possible, including minimum environmental/sustainability criteria. In addition, the OGP and partner central purchasing bodies will provide up-to-date online information on central purchasing arrangements that have included GPP criteria. Utilising these centralised procurement arrangements can support public sector bodies in meeting their obligation to include GPP criteria in all tender documents, where possible.

6. Socially Responsible Public Procurement

Sustainable Public Procurement is a wider concept than GPP, in that it includes economic considerations as well as socially responsible public procurement. Public sector bodies are encouraged to consider the scope for including wider sustainable considerations, including socially responsible public procurement (SRPP), in their procurement. SRPP and GPP can be used in tandem or separately, depending on the subject matter of the contract and the outcome of the preliminary market consultations.

The Government recognises the important role played by social enterprises and community-based organisations in advancing GPP objectives, particularly in relation to circular procurement and promoting reuse and repair. Public sector bodies are encouraged to consider taking steps to promote the participation of such bodies in their procurements, particularly when implementing GPP. Such steps could include, but are not limited to, reserving a contract or element thereof under Regulations 20 (Reserved Contracts) or 77 (Reserved Contracts for Certain Services) of the Procurement Regulations, promoting a partnership with a social enterprise in the delivery of the contract and seeking quotations from social enterprises for contracts with a value below the national advertising thresholds.



7. Innovation Procurement

Buying Greener sets out key principles to be adhered to by all public sector bodies that are using public funds as part of their procurement processes. Included amongst these principles is for consideration to be given to using an innovative procurement to find goods, services, or works to address a specific environmental need that cannot be otherwise met. Innovation procurement has the ability to stimulate growth, drive new solutions, including those that are more environmentally friendly, and deliver transformational change. GPP can be a major driver for innovation by challenging the market to create products, solutions and tools that do not currently exist. Public sector bodies are encouraged to consider the use of innovation procurement as a strategic tool to find green solutions and deliver on GPP commitments.

8. Dissemination and Implementation of the Circular

You are requested to bring this Circular to the attention of all staff in your organisation who are involved in any aspect of procurement and all bodies, offices and agencies under the aegis of your organisation.

9. Enquiries

Queries in relation to the operation of this Circular regarding the procurement of goods and services should be directed to support@ogp.gov.ie.

Queries in relation to the procurement of works and works related services should be directed to construction@per.gov.ie.

For help on different aspects of the SEAI Monitoring and Reporting system please refer to the [Monitoring and Reporting system Help Wiki](#). Further queries in relation to the SEAI Monitoring and Reporting system should be directed to MandR@seai.ie.

Queries in relation to GPP Monitoring & Reporting by government departments to the EPA and national GPP Guidance should be directed to the EPA.