



Sinead Carr
Chief Executive
Tipperary County Council
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Emmet Street
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27 June 2024

Re: Public procurement guidance to promote the reduction of embodied carbon in construction

Dear Ms Carr,

As you may be aware, as Minister for Enterprise, Trade and Employment, I am responsible under the Climate Action and Low Carbon Development (Amendment) Act 2021 for our national objective to reduce Industry emissions by 20% by 2025 and 35% by 2030. While Industry emissions amount to nearly 10% of the national total, our cement sector amounts to almost half of these, or just under 5% of the total. A key input into the construction of housing and infrastructure, a balanced but ambitious approach to construction materials is therefore required.

The Climate Action Plan 2023 recognises the need for public sector leadership to decarbonise cement production and our construction sectors, with an action to “*Specify low carbon construction methods and low carbon cement material as far as practicable for directly procured or supported construction projects from 2023*” and key targets to decrease embodied carbon in construction materials by 10% by 2025 and by 30% by 2030 for materials produced and used in Ireland. This obligation is reflected in the Public Sector Mandate for relevant bodies including Government Departments, state agencies and local authorities.

My department established the Cement & Construction Sector Decarbonisation Working Group, comprising relevant public sector stakeholders, the Irish Green Building Council and independent expertise, to bring a shared ambition to reducing emissions within these sectors. The working group has agreed that a ‘multi-pronged’ approach to motivating and facilitating the cement and construction sectors to decarbonise is required, aligned to work already underway on Modern Methods of Construction, the Timber in Construction Taskforce and ongoing implementation of Housing 4 All.

The public sector’s buying power can drive a market for greener construction materials, such as lower carbon cement and concrete, through Green Public Procurement to promote lower carbon public construction projects.

I am writing to provide detailed guidance for public bodies, that will ensure a consistent approach across public sector construction projects, which is set out as an annex to this letter. This guidance is in line with the Public Sector Mandate, Local Authority Climate Action obligations, governance of commercial semi-states, sectoral Climate Action Plans, and the Climate Action Plan more broadly. It will send a coherent and clear signal to construction materials producers and suppliers, as to our decarbonisation objective.

An independent expert consultant's report "*Reducing embodied carbon in cement and concrete through Public Procurement in Ireland*" was procured to support the work of the Cement and Construction Sector Decarbonisation Working Group and has informed this approach. It has now been published on my [Department's website](#) following approval by Government at Cabinet on 28th May 2024.

I am now writing to all Government Departments, NewERA within the NTMA, and Local Authorities requiring that they follow the provided guidance; specifying low carbon construction methods and low carbon cement material, as far as practicable, for procured or supported construction projects. The guidance represents a minimum standard, with significant scope available to public bodies for innovation, implementation of Modern Methods of Construction, and specifying low carbon construction materials in addition or exceeding this requirement.

Alongside the guidance issued, a short information video is provided further explaining the requirements, on the [Department's website](#) We would encourage the circulation of both the guidance and the video to all officials involved in construction projects, and related procurement.

We look forward to the engagement of your officials in this work. My officials in the DETE Climate Action & Energy Policy team remain available to deal with any queries on this at climateaction@enterprise.gov.ie

Yours sincerely,

A handwritten signature in blue ink that reads "Peter Burke". The signature is fluid and cursive, with a large initial "P" and "B".

Peter Burke T.D.

Minister for Enterprise, Trade and Employment

Annex: Guidance to Public Bodies on Reducing Embodied Carbon in Cement and Concrete through Public Procurement

Under the Climate Action Plan, all public bodies are required to specify low carbon construction methods and low carbon cement material as far as practicable for directly procured or supported construction projects. The Cement & Construction Sector Decarbonisation Working Group considers this requires that, at a minimum, for projects commencing design from 1st September 2024:

- a) Public bodies should be guided by best-practice carbon management design approaches, including avoidance of over-specification of materials, when undertaking or procuring construction projects.
- b) Concrete products procured by public bodies, or used in publicly produced construction projects, including poured or pre-cast products, should in general specify a minimum of 30% clinker replacement, consistent with IS EN 206, except where a technical justification is made by a suitably qualified professional to the satisfaction of the procurer.
- c) High-carbon CEM I cement products should not be procured by public bodies, or used in publicly produced construction projects, except where a technical justification is made by a suitably qualified professional to the satisfaction of the procurer.
- d) Public bodies should seek an Environmental Product Declaration, to an EN 15804 standard, or equivalent when directly procuring cement or concrete products. Confirmation of a similar disclosure should be sought by public bodies, where a contracted party is managing materials procurement. When available, public bodies should require a Declaration of Performance and Compliance under the Construction Product Regulation.
- e) From 1st September 2025, public bodies that are commencing design for new buildings for projects in receipt of exchequer funding in excess of €10 million in the case of non-residential buildings, or in excess of €60 million in the case of residential buildings, should produce or procure a Whole Life-Cycle Greenhouse Gas Emissions assessment in accordance technical guidance to be provided by SEAI in 2025, consistent with the Energy Performance of Buildings Directive. Subject to a review of the first step, from 1st June 2026, projects in receipt of exchequer funding in excess of €5 million in the case of non-residential buildings, or in excess of €30 million in the case of residential buildings, should produce such an assessment. Projects below this scale should also consider implementing this assessment.
- f) Public bodies procuring infrastructure projects (construction other than buildings) in receipt of exchequer funding in excess of €60 million, should produce or procure a Whole Life-Cycle Greenhouse Gas Emissions assessment for their project. From 1st January 2026, projects in receipt of exchequer funding in excess of €10 million should produce such an assessment. Public bodies should identify the most appropriate, available methodology to ensure that the project's embodied carbon is suitably interrogated, and applicable to the infrastructure or project-type. Projects below this scale should also consider implementing this assessment. Data produced for Building Information Modelling (BIM), introduced under the Capital Works Management Framework can, in most cases, also be used to produce this assessment.