



Graciela Estobo Mante

Green Public Procurement in EU: Drivers and Barriers of Adoption

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Supervisor: Prof. Dr. Dr. h.c. Dr. h.c. Jörg Becker
Tutor: Sebastian Halsbenning, M.Sc.

Presented by: Graciela Estobo Mante
Laki 24
12915 Tallinn
+372 589 38846
lalamante@gmail.com

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I wish to dedicate this work to my father who passed away when the PIONEER programme just started. I also want to extend my gratitude to my Mama and my sisters for always being there for me.

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And, lastly, to God be the glory!

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Abbreviations

10YFP	10-Year Framework of Programmes on Sustainable Consumption and Production Patterns
APEC	Asia-Pacific Economic Cooperation
CSR	Corporate social responsibility
EMAS	Eco-Management and Audit Scheme
EMS	Environmental Management System
EPP	Environmentally Preferable Products
ERDF	European Regional Development Fund
FSC	Forest Stewardship Council
GDP	Gross Domestic Product
GPP	Green Public Procurement
ICLEI	International Council for Local Environmental Initiatives
ISO	International Standard Organization
LCA	Life Cycle Assessment
MEAT	Most Economically Advantageous Tender
PEFC	Programme for the Endorsement of Forest Certification
SME	Small and Medium Enterprises
SPP	Sustainable Public Procurement

1 Introduction

With an estimated EUR 1.8 trillion spent annually by the government in the purchase of works, goods, and services, the implementation of Green Public Procurement(GPP) is believed to be an essential tool towards the achievement of goals on sustainability (European Commission, 2016). Climate impact mitigation, lower carbon emissions, cost savings, and reduced consumption are just some of the benefits that GPP bring (Darnall et al., 2017). GPP is also believed to shape the trend for consumption and production (Testa et al., 2015).

In the European Union, GPP is not mandatory (European Commission, 2019), and its uptake has been slow as evidenced by the failure to achieve the 50% target of the EU in 2010 to obtain green tenders (Bratt, Hallstedt, Robèrt, Broman, & Oldmark, 2013). Those in the local level of the government, especially, seem to encounter green purchasing issues on environmental knowledge and awareness, politics, organization and finances (Cheng, Appolloni, D'Amato, & Zhu, 2018).

In order to attain a better understanding what causes the challenges in the uptake of GPP, this study will identify the drivers and barriers associated with it. Although there are existing researches on GPP, the focus on the local level is limited. Sustainable procurement in the public sector is also less explored compared to the private counterpart (Walker & Brammer, 2009). Thus, this paper aims to contribute to the research community by providing a reference for the formulation of more effective green public procurement strategies in the public sector.

The main objective of this study is to examine the adoption of green public procurement and explore the elements behind its slow uptake.

The research shall first discuss the literature review available and explain the conceptual framework used for the study. The next section will discuss the method used to obtain the desired results. Results from the interviews conducted will then be presented followed by the discussion and finally the conclusion will be presented.

2 Literature Review

This chapter provides an overview of the elements of GPP and its implementation based on available academic literature and reports from institutions. The factors which influences the uptake of GPP adoption are also presented.

2.1 Definition of GPP and SPP

Green Public Procurement(GPP) is considered a crucial tool towards sustainable consumption and production (European Commission, 2016; OECD, 2011) and a policy instrument for environmental goals (von Oelreich & Philp, 2013). It is defined as “a process whereby public authorities 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 procured” (European Commission, 2008a). Furthermore, it has four “building blocks” which defines it more thoroughly as: (1) greener product, (2) use of green technology, (3) greener functionality, and (4) green procurement process (Bouwer, M., de Jong, K., Jonk, M., Berman, T., Bersani, R., Lusser, H., Nissinen, A., Parikka, K. and Szuppinger, 2005). Furthermore, GPP is believed to drive innovation, save costs for public authorities and provide guidance towards circularity (European Commission, 2016).

On the other hand, Sustainable Public Procurement (SPP) is defined in 2006 by the UK Sustainable Procurement Task Force as “a process whereby organizations meet their needs for goods, services, works and utilities in a way that achieves value for money on a whole life basis in terms of generating benefits not only to the organization, but also to society and the economy, whilst minimizing damage to the environment” (DEFRA, 2006). Efforts for sustainable procurement abound, in fact, in the 2030 Agenda for Sustainable Development, Sustainable Development Goal (SDG) 12 contains target 12.7 which states, “Promote public procurement practices that are sustainable, in accordance with national policies and priorities” (UNEP, 2019).

In this paper, the terms GPP or SPP could be interchangeably used as some member states and organizations consider them similar in practice. Nevertheless, the environmental component of SPP is in focus for the whole research.

2.2 Regulations and Policies on SPP/GPP

It is reported that the Republic of Korea was one of the earliest adopters of SPP policies in 1981 by favorably buying products made by army veterans and the country continued making preferential purchases using environmental and social criteria (UNEP, 2017).

The country formally integrated GPP to their policies through the Act on Development and Support of Environmental Technology in 1994. Japan on the other hand, launched its Action Plan for Greening Government Operations in 1995 (UNEP, 2019).

Meanwhile, the U.S. Government's Executive Order 12873: Federal Acquisition, Recycling and Waste Prevention is considered the first environmental procurement policy in the United States which was adopted in 1993. (UNEP, 2017)

Table 1

GPP Policies

Year	Policy	Description
1992	Agenda 21	Compendium of directions to be followed in the twenty-first century by each State on Sustainable Development "think globally, act locally."
1996	COM(96) 583	Green Paper on public procurement, which introduced the environmental and social requirements at the level of National and Communitarian competitions.
2001	COM(2001) 31	Sixth Environment Action Program of the European Community defines the Integrated Product Policy.
	COM(2001) 274	It describes the entire procurement process, identifying the contracts included in the directives and highlighting the possibilities offered by existing rules to structure the various stages of a procurement tender, from definition, execution until completion.
2003	COM(2003) 302	National Action Plan on GPP and Integration of environmental criteria on procurement procedures.
2004	Directive 2004/17/EC Directive 2004/18/EC	Directives 17 and 18 of 2004 support further certain decisions of the European Court of Justice, filling some gaps in legislation and providing the legal support on GPP. Both Directives, guiding the Member States currently, respectively, govern the procedures of "Public procurement in water, energy, transport and postal services" and "Public procurement in work, supply and services."
2008	COM(2008) 397 COM(2008) 400	"Public procurement for a better environment," GPP definition. Action plan "Sustainable Consumption and Production" and "Sustainable Industrial Policy," the Communication is concerned with the implementation of a several measures aimed to improve the energy and environmental performance of the products throughout their life cycle and to stimulate the demand and the consumption of better-quality products, creating a "virtuous circle."
2009	COM(2009) 400	Redefinition European long-term objectives with a prospective to achieving sustainability.
2010	COM(2010) 2020	Europe 2020 (inclusive, smart, and sustainable); European Map 2050 that requires the transition to a low carbon economy by 2050.
2011	COM(2011) 896	Enforcing the support to the future strategies and European Union norms.
2014	Directive 2014/23/EU Directive 2014/24/EU Directive 2014/25/EU	Simplify the structure of the purchase contract and include requirement fostering social and environmental responsibility (Sustainable Public Procurement).
2015	Agenda 2030	Strategic program for people, planet, and prosperity signed in September 2015 by the governments of the 193 UN member countries. It encompasses 17 Objectives for Sustainable Development—Sustainable Development Goals (SDGs), in a major program of action for a total of 169 "target" or goals.
2017	Public Procurement for a Circular Economy	European policy framework and practical guidance to those involved in public procurement decisions.

Note. Relevant Policies in Green Public Procurement. Reprinted from *The State of the Art of Green Public Procurement in Europe: Documental Analysis of European Practices* (p.178), by I. Litardi, G. Fiorani, D. Alimonti, 2020 in *Accountability, Ethics and Sustainability of Organizations. Accounting, Finance, Sustainability, Governance & Fraud: Theory and Application*.

In the international setting, the convergence of environmental aspects to the procurement process took root in 1992 through the Rio Declaration on Environment and Development

where sustainable consumption was encouraged to the governments. This gave way to the culmination of the Sustainable Development Goals in 2015 at the UN Sustainable Development Summit where environment and sustainable elements of procurement were acknowledged to leverage the agenda for sustainable development (Litardi, Fiorani, & Alimonti, 2020; UNEP, 2017).

The EU is considered to have a comprehensive framework for green purchasing where the focus on sustainable procurement highlights on the green element compared to social or economic (International Institute for Sustainable Development, 2007). As seen in Figure 1, there have been a number of initiatives endorsing GPP in the EU member states recognizing its potential to institute change in various aspects of society including innovation and consumption patterns. In 2015, the Circular Economy Plan was adopted and included GPP as one approach to obtain resource efficiency (European Commission, 2016). The European Commission in 2003 through its Communication on Integrated Product Policy (IPP) encourage the member states to each prepare a National Action Plan (NAP) outlining measures on green or sustainable public procurement.

2.3 GPP Implementation

The level of uptake of GPP is presented in this chapter as well as how green procurement is integrated in the current procurement system. Best practices and other initiatives undertaken to develop GPP are also highlighted.

2.3.1 Status of Adoption

Policies on sustainable or green procurement vary across the world depending on the national government's objectives (UNEP, 2017) which reflects how there are also varying levels of uptake of sustainable procurement across regions (Brammer & Walker, 2011).

In a study conducted by UNEP (2017) with 201 individuals from 62 countries and 186 organizations, it shows that 51 percent reported that social, environmental and economic factors are considered when doing procurement which shows a decrease from UNEP's previous survey in 2012. In Japan, 53 percent of department directors said policies on green procurement have been implemented in their municipalities, of which 65 percent claimed the adoption was successful (Darnall et al., 2018).

For the EU, a group of countries called Green-7 was highlighted as a result of a study where Austria, Denmark, Finland, Germany, Netherlands, Sweden and UK perform favorably well compared to the other 18 nations in terms of tenders and questionnaire ratings. These countries were also observed to have "strong political drivers, national

guidelines and programmes for GPP, public information resources via websites and eco-labels, use of innovative tools like life cycle thinking and green contract variants in procurement procedures and frequent implementation of environmental management systems (EMS) by purchasing authorities” (p.1). (Bouwer et al., 2006)

Furthermore, another study shows that the 50 percent target of GPP adoption set by the European Commission in 2008 has not been met by the EU member states. Figure 1 shows the fragmented view of adoption in EU showing Belgium, Denmark, the Netherlands and Sweden having an uptake of more than 40 percent while as many as 12 countries falling below 20 percent range. (Renda et al., 2012).

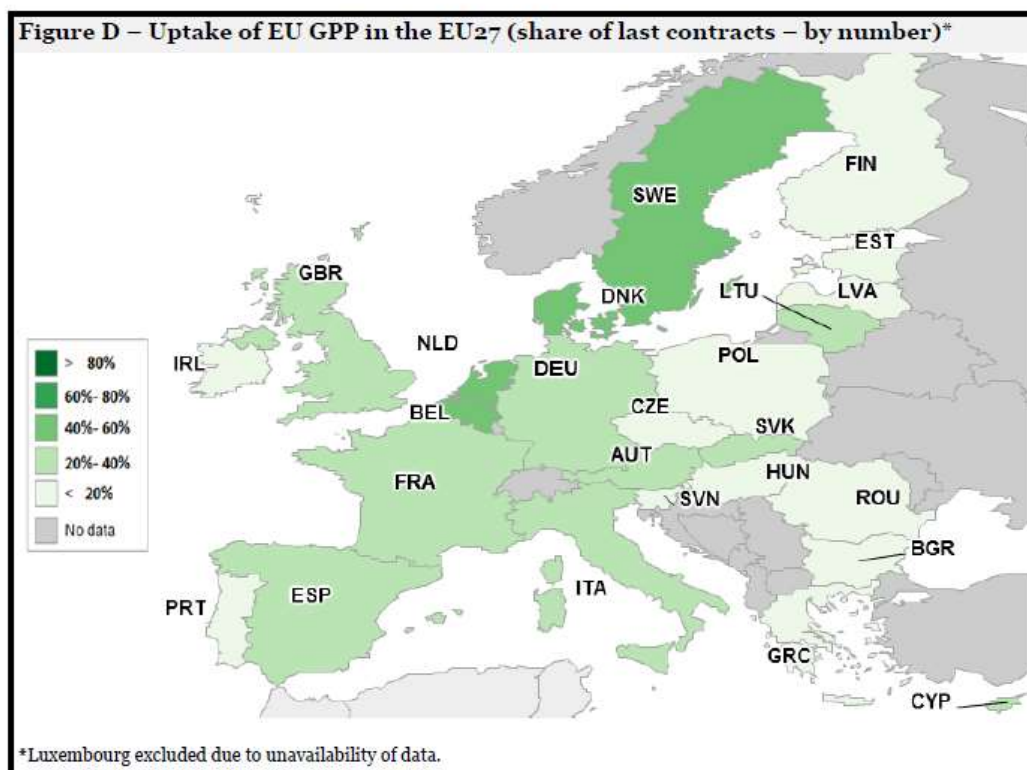


Figure 1. Uptake of GPP in EU. Reprinted from “The Uptake of Green Public Procurement in the EU27” by A. Renda, J. Pelkmans, C. Egenhofer, L. Schrefler, G. Luchetta, C. Selçuki, J. Ballesteros, A. Zirnhelt, 2012, p. ix.

On the other hand, the European Commission in 2003 through its Communication on Integrated Product Policy (IPP) encouraged the member states to each prepare a National Action Plan (NAP) outlining measures on green or sustainable public procurement. The NAPs are not legally-binding but is a good representation of the country’s direction towards GPP development. (European Commission, n.d.) The status of NAPs in the EU member states are outlined in Table 2.

Table 2

Status of GPP National Action Plans in EU Member States

Has a National Action Plan or equivalent document	No existing NAP
Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Finland, France, Germany, Ireland, Italy, Latvia, Lithuania, Malta, Netherlands, Poland, Portugal, Slovakia, Slovenia, Spain, Sweden	Estonia, Greece, Hungary, Luxembourg, Romania

Note: Reprinted from https://ec.europa.eu/environment/gpp/action_plan_en.htm

2.3.2 Integration of GPP in the Procurement Cycle

According to a 2010 OECD Survey, green criteria are applied mostly in the technical specifications, while others apply them in the award phase or as a contract performance clause (OECD, 2011). There are countries like Belgium, Canada, Estonia, France, Israel, Italy, Luxembourg, Netherlands, New Zealand, Poland, Slovenia and Spain who apply the green criteria in all procurement stages. On the other hand, the survey also shows those who did not indicate the application of criteria in any of the procurement phase like Australia, Czech Republic, Hungary and Norway.

Moreover, the United Nations Development Programme (UNDP) published an Environment Procurement Practical Guide handbook (UNDP, 2008) showing a diagram which is defined in their UNDP Contract, Asset & Procurement Management User Guide. Figure 2 illustrates where to integrate the environmental criteria in the procurement process in the UNDP system.

According to the document, incorporating environmental aspects to a purchase is preferably done in the early phases of the procurement procedures. The planning phase is considered crucial and any errors at this stage will influence the outcome of all stages. The diagram points out the stages where interventions could be most effective. Furthermore, subject matter definition of the contract, green title selection and market analysis are also essential elements to take into account. (UNDP, 2008)

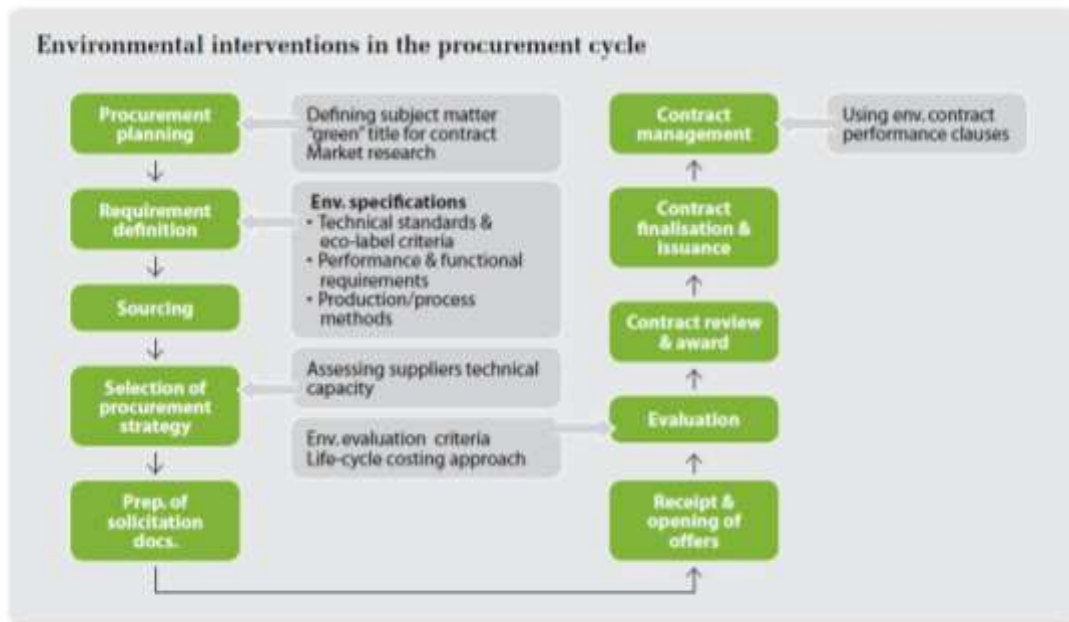


Figure 2. GPP Integration Process. Reprinted from “Environmental Procurement Practice Guide” by UNDP, 2008, p. 10.

2.3.3 GPP Criteria

Common EU GPP criteria are incorporated to tender documents if you want to consider the environmental impact of your purchase of goods, services or works (European Commission, 2020). They come from multiple sources and their development process involves stakeholders, life-cycle adoption and use of scientific data. These criteria include selection and award criteria, specifications and contract performance clauses to aid in the green tenders. They are added in the documents with notes on verification procedures. There are two levels of EU GPP Criteria for product groups which are: (1) core criteria for simple GPP application and (2) comprehensive criteria for wider aspects of environmental performance (European Commission, 2016). When using GPP criteria for procuring goods, services and works, one should consider the principles of transparency, non-discrimination, proper alignment of contract details and mutual recognition (European Commission, 2020).

2.3.4 Environmental Management Systems and Ecolabels

Environmental management systems

The Eco-management and audit scheme (EMAS) and the European/international standard on environmental management systems (EN/ ISO 14001) serve as the main certification

schemes in EU. According to the Buying Green Handbook of the European Commission(2016), environmental management systems provide assistance to organizations in terms of continuous improvement on environmental performance through tools, training or environmental purchasing. ISO 14001 or EMAS gives practical guide to GPP implementation and monitoring (Testa, Iraldo, Frey, & Daddi, 2012).

In 2017, the International Standards Organization (ISO) issued ISO 20400:2017, the first guidance for Sustainable Procurement which aims to assess the ethical and sustainability aspects of procurement in organizations. (ISO, 2017)

Ecolabels

Ecolabels aim to help purchasers identify products and services according to environmental and social standards (UNEP, 2017). A survey in fact say that a third of Europeans(32%) consider ecolabels for their purchasing decisions (European Commission, 2017). With regards to GPP implementation, ecolabels can be used in technical specifications and award criteria development as well as compliance verification(European Commission, 2016). Ecolabels are considered essential in the uptake of sustainable procurement as they guide procurers in identifying environmental products and services with no associated expertise needed(UNEP, 2017) .

The following are different types of environmental labels available :

- Type-I (Ecolabelling schemes: ISO 14024:1999) labels define environmental performance and are the most commonly used labels. (European Commission, 2016; ISO, 2012)
- Type-II (Self-declared environmental claims : ISO 14021:1999) labels are used by companies to claim about the environmental quality of their product or services (ISO, 2012).
- Type-III (Life-cycle data declarations: ISO 14025:2006) labels provide environmental declarations that could be verified independently. (ISO, 2012)

The GPP Training Toolkit(European Commission, 2008b) also lists down other label classifications. Public, single-issue labels are based on a pass/fail criteria or environmental performance and are usually associate with energy labels such as Energy Star or EU energy label. Private labels on the other hand are usually set up by independent groups or organizations. Examples are FSC (Forest Stewardship Council)² or PEFC (Pan European Forest Certification Council)³ schemes for forestry certification, IFOAM⁴ for organic labels or Swedish label ‘Bra Miljöval’⁵ for multiple-criteria labels. Moreover,

UNEP(2017) stated that according to Ecolabel Index, there are at least 465 ecolabel programmes and more sustainability standards available globally.

2.4 Drivers of GPP Adoption

Several studies have been done to discover what enables the adoption of green or sustainable procurement globally. In a study in Japan(Darnall et al., 2018), they found out that the characteristics which made the adopters differ with non-adopters are because of complementary policies and practices, purchasing criteria, information access, leadership, employees and resources and vendor roles.

The study of Bouwer et al. (2006) also confirms this as the result show that the Green-7 or the countries with advanced implementation of GPP in EU have strong political leadership, national programs are established, information sources are available, GPP tools are optimized and that environment systems are in place.

2.5 Barriers of GPP Adoption

A study by OECD in the year 2007, mentioned that some common barriers to implementation of green procurement include lack of knowledge among the procurement officials. Moreover, despite the available documentation in several countries, the code of practice still is not properly implemented. Later, OECD published another study in 2010 that determined barriers such as higher costs associated with green procurement, implementation of the real procurement process, low level of monitoring mechanism, limited number of suppliers and lastly, lack of initiative to move towards green procurement. Despite these challenges some countries such as Estonia, Norway and Sweden have a mechanism to identify the green procurement initiatives. The study of Bouwer et al identified three major obstacles in implementation of green procurement; these include 44% public officials having the notion that green procurement results in higher cost, 35% had the reservation that policies lack in terms of promoting such initiative and 35% had the opinion that there is a lack of competence to determine the environmental standards for green procurement. In addition to, barriers such as lack of political support, lack of legal expertise, unavailability of practical tools, less training, lack of coordination between authorities, exorbitant costs and implementation challenges have been mentioned by several researches (Arvidsson and Stage, 2012; Bala et al., 2008; Boström et al., 2015). The strategic planning experts identify several factors that result as bottlenecks for GPP. For instance, (Price Waterhouse Coopers 2015) identified these issues as being too expensive, quite risky, do not provide enough value, require more work, new employees with different sets of skills and lastly, the monitoring challenges.

According to the literature, budgetary constraints represent one of the critical barriers to green public procurement (Zhu et al., 2013; Brammer and Walker, 2011; Walker and Brammer, 2009). Furthermore, organizational culture and leadership style can also be identified as hindering factors (Roman, 2017; Islam et al., 2017; Brammer and Walker, 2011). Another barrier encountered in the literature and empirical studies conducted is that tenders are usually unclear, and the criteria show a clear lack of understanding by the officers (Bouwer et al., 2006): This is why the European Commission (EC) has published a guidebook for GPP which includes a training toolkit for officers (EC, 2004).

2.6 Conceptual Framework

Acknowledging the influence the national policies might have to any undertaking of organizations, the researcher shall be guided by the conceptual framework of Brammer and Walker (2011) shown in Figure 3 which was used for their comparative study of sustainable procurement with international public institutions. The model aims to explore the connection of national policies to how sustainable procurement is accepted across regions. This framework was applied to a study using snowball sampling and survey involving 280 public procurement practitioners in 20 countries.

Considering similar variance of samples exist in this thesis albeit fewer respondents from 10 organizations from nine countries, the researcher believes this framework suits the objective of this study to identify the drivers and barriers of GPP adoption.

For this thesis, the conceptual framework will be reflected while examining the barriers and enablers of GPP adoption across the European Union. The researcher will look further on the four influences integrated into the model and obtain insights from the results of the interviews. The influences to be checked are the financial context of GPP, level of awareness of GPP, availability of green products and the cultural aspect of the organization.

The result of the work of Brammer and Walker(2011) shows that policy environments indeed influence the engagement of sustainable procurement in organizations. For the first influence, the authors revealed that “*where directives are more voluntary in character, competing necessities and priorities often dominate*” (p. 471). The results do not conform to previous research however, when it comes to the second and third influences. As they found out from their study, awareness and lack of supplier availability do not affect the organization to commit to sustainable procurement. On the other hand, the fourth factor shows a positive influence to sustainable procurement engagement.

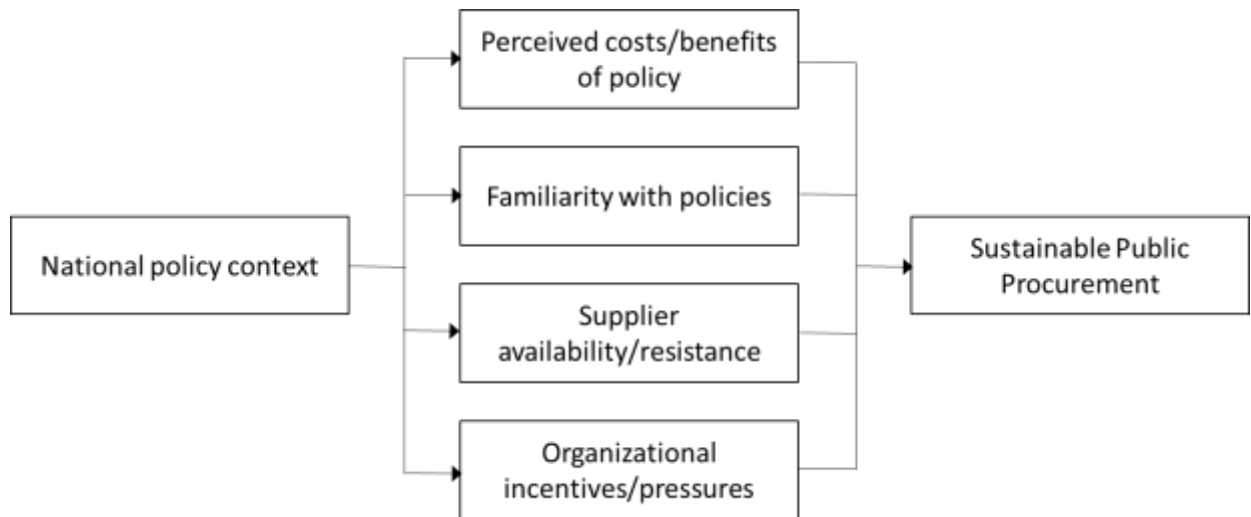


Figure 3. Conceptual Framework for GPP Adoption. Reprinted from “Sustainable procurement in the public sector: An international comparative study” by S. Brammer, H. Walker, 2011, *International Journal of Operations & Production Management*, 31, p. 456.

3 Methodology

This chapter outlines the approaches followed by the researcher to obtain the results of the study. The design of the research, the methods of data collection, data analysis as well as the considerations for ethics and research quality are discussed.

3.1 Research Design

Guided by the aim to obtain clarification and further understanding on what hinders and drives the adoption of GPP in EU member states, this paper applies a qualitative research strategy with an exploratory approach (Saunders, Lewis, & Thornhill, 2009) which gives emphasis on conceptualization from words given by the research subjects rather than analyzing numerical values (Bryman, 2012). Furthermore, this paper is guided by the philosophy of interpretivism which draws meaning on the observation and reflection of social phenomena (Saunders et al., 2009). Qualitative analysis of the social context of the data collected is then conducted according to the analytic and integrative skills of the researcher (Bhattacharjee, 2012).

The use of inductive approach in this paper gives flexibility in guiding the direction for probable further work as the research process evolves (Saunders et al., 2009). Moreover, the review of available secondary data and in-depth interviews is relied on the exploratory element of this research (Rajasekar, Philominathan, & Chinnathambi, 2006).

3.2 Data Collection

Analysis of reports, previous research and semi-structured interviews with GPP practitioners were conducted to achieve the objectives of the study. The details of the data collection strategies used are discussed in the sections that follow.

3.2.1 Primary Data

Interviews were done with the aim of acquiring relevant data with rich details describing a certain phenomenon fit for the perspective of the target discipline (DiCicco-Bloom & Crabtree, 2006; Mills, Durepos, & Wiebe, 2010). In particular, semi-structured in-depth interviews, the mostly used method and often the major source of data in qualitative research (DiCicco-Bloom & Crabtree, 2006) were conducted to explore the perspective of the participants without disrupting the frame and structure of their responses (Rajasekar et al., 2006). Semi-structured interviews also allow the researchers to have an open mind while the data emerge from the discussions (Bryman, 2012).

Interviewee Selection

The researcher selected the respondents through a non-probability strategic process called purposive sampling (Bryman, 2012) which helps to amplify the richness and quality of the data needed to answer the research questions (DiCicco-Bloom & Crabtree, 2006). The researcher seeks to obtain the participation of individuals with the expertise and knowledge in Green Public Procurement in the perspective of their organization, their country and the European Union. Having a facilitating or coordinating role in the implementation of Green Public Procurement in their organizations is desired. The sample came from a list of official organizations involved in GPP for each member state which was acquired from the European Commission's GPP website. Anticipating there would be delayed or no responses at all because of the onset of the pandemic situation during this phase of the research, organizations who are members of the commission's GPP Advisory Group were also contacted along with institutions who are part of ongoing EU-funded GPP projects.

Overall, the researcher reached out to 45 organizations from 27 member states. Due to the COVID-19 crisis, a number of organizations declined the request for interviews. Nevertheless, 11 email responses were received.

Interview Profiles

Annex A shows the profile details of the eleven officials from ten organizations belonging to nine countries who positively responded to the interview requests. Nine of the respondents work in the public administration sector while two of them are from non-government organizations. The respondents from the government work at different organizational levels. The respondent from Belgium works for the Federal Institute of Sustainable Development, the respondents from the Czech Republic, Ireland and Sweden are from the environment ministries, the respondents from Hungary, Netherlands and Sweden work for the national procurement agencies, while the respondents from Italy and Spain work in regional authorities. The other participant is from the SYKE Finnish Environment Institute, a research organization in Finland, and another works for SMEUnited, a non-profit, non-partisan organization representing craft and SME federations in Europe. These key informants play advisory and strategic management roles with facilitating and coordinating duties with procurers, and thus, are essential sources of contextual data (Saunders et al., 2009).

Interview Procedure

After the confirmations from the respondents, interviews were scheduled consequently through email communications. Due to the geographical spread of the participants and the looming issues with the pandemic, electronic interviews through synchronous web conferencing and asynchronous email interview (Morgan & Symon, 2004) were

organised. Nine of the interviews were done through Skype and Zoom while two participants opted for email interviews. Interview questions guide were sent to the respondents before the interviews. The internet-based video conference meetings were done between April 9, 2020 and May 20, 2020 and lasted from 30 minutes to 147 minutes. While some researchers argue that online interviews do not give the same level of interaction and spontaneity than face-to-face meetings, others also claim that this form of dialogue generates considerable outputs (Saunders et al., 2009). Considering the special circumstances, the use of electronic interviews in this research is appropriate.

All interview data were audio-recorded as this captures a more accurate reference of ideas than note-taking alone (Yin, 2018). The researcher also took down notes during and after the interviews to leverage on the recent concepts acquired (Saunders et al., 2009). Subsequently, the audio files were uploaded to a website featuring an automatic speech-to-text transcription software called otter.ai. To check for errors, the audio materials were again listened to and manually compared to the transcribed text from the software. After a few iterative attempts of cleaning the data, the output was consequently loaded to a computer aided qualitative data analysis software (CAQDAS) package named Nvivo 12 Pro for Windows.

Interview Questions

Applying a semi-structured interview approach, a set of guide questions shown in Annex B was prepared prior to the interviews and were emailed to the respondents to let them prepare for the topic. According to Saunders et al. (2009) there is flexibility in this method as other questions could be excluded depending on the flow of the conversation. Contingent to the participant, some questions were not answered. The researcher also limited some questions depending on how the interview progresses. The outline of the questions covers (1) organization background; (2) details of implementation of GPP; (3) drivers and barriers of GPP adoption; and (4) monitoring of impact.

3.2.2 Secondary Data

Desktop research was done by the researcher to gain an overview of the literature to subsequently filter the needed documents according to the context needed. Scientific journals, reports, conference papers, books and other publications were reviewed to identify theories, concepts and insights for the study. The go-forward approach (Webster & Watson, 2002) was done to navigate through the plethora of resources. Academic databases such as Limo, Scopus, Web of Science were used to search for the documents. Google scholar and Microsoft Academic were also consulted. The researcher first used the keywords “gpp”, “spp”, “green public procurement”, “sustainable procurement” and

“green purchasing” to familiarize with the available resources. Later on, the search was narrowed down using the keywords “enablers of GPP”, “drivers of GPP adoption”, “barriers of GPP adoption”, “barriers of sustainable public procurement”, “issues in green procurement”. The chosen articles were then reviewed and inputted to the concept matrix excel sheet.

3.3 Thematic Analysis

The researcher used thematic analysis in processing the interview transcripts through the aid of Nvivo 12 and manual coding. Specifically, template analysis was employed which gives more flexibility for the researcher in analysing the hierarchical nature of the emerging concepts. A coding template according to the interview guide questions was initially inputted as nodes in Nvivo. Template analysis operates on a more open approach without suggesting in advance sets of levels. The following steps shown in Figure 4 are followed as adapted from Brooks et al (2015).

First, the researcher pores over the transcripts to be familiarized with the main ideas mentioned. This was also done while writing down notes and inputting the more important elements or codes into the software. A priori themes were already identified in advance based on the interview guide questions but themes for the drivers and barriers relatively remained open. During the process, some codes were either removed or added to other parts of the structure. More than 500 nodes were created by the researcher on Nvivo and these were clustered into more meaningful groups that share the same concepts. The process was iterative until the desired themes emerged and lesser similarities were observed with other nodes and themes.

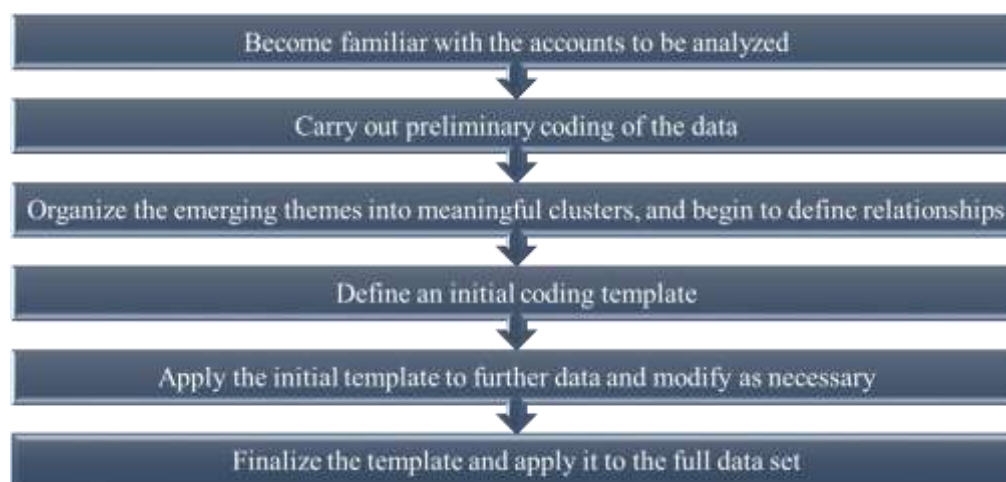


Figure 4. Steps for Thematic Analysis. Adapted from “The Utility of Template Analysis in Qualitative Psychology Research” by J. Brooks, S. McCluskey, E. Turley, N. King, 2015, *Qualitative Research in Psychology*.

3.4 Ethical Consideration

The researcher adhered to the standards and quality of research ethics stipulated by Yin(2008) all through out the research process. Professional competence was maintained during the interviews and quality of research data was considered at all cost.

4 Empirical Findings

This section discusses the results obtained from the thematic analysis of the interviews conducted. Insights on different aspects of GPP or SPP were identified as perceived by the respondents. As the researcher seeks to explore the answers for what drives or hinders the adoption of GPP in the EU member states, factors mentioned only once were not discarded as different organizations may have diverse perspectives and considerations.

4.1 GPP/SPP Background

The countries of Hungary, Ireland, Italy and Spain are implementing Green Public Procurement in their transactions while Belgium, Czech Republic, Finland, Netherlands and Sweden are using Sustainable Public Procurement. In countries implementing GPP, the incorporation of the other two pillars of sustainability, the social and economic elements, to their public procurement processes has been either already introduced or still in its infancy stage.

4.1.1 History and Legislative Frameworks

The use of environmental criteria in public procurement among the countries represented by the respondents has been going on for more than two decades. Based on the interviews, the earliest inclusion of environmental criteria in the procurement arena was drawn out of national initiatives in the 1990s in Sweden and Czech Republic. The latter implemented it together with their national system of ecolabelling in 1993.

Other countries started from 2000 onwards. Finland's GPP efforts stemmed from their Programme for Sustainable Consumption and Production in the start of 2000 and was later on followed by several frameworks. Hungary's early efforts on GPP was through the 2005 amended version of Act CXXIX of 2003 on Public Procurement with GPP provisions transposed from the European Commission's directives 2004/18/EC and 2004/17/EC. Act CXLIII of 2015 on Public Procurement currently serves as the legal framework for the country.

On the other hand, the respondent from the Netherlands stated that environmental Initiatives took root from CSR. Meanwhile, the start of their SPP journey was through a manifesto on Sustainable Public Procurement around 2008.

Italy adhered to the European Commission's directive on the preparation of a National Action Plan on GPP which was adopted in 2008. In 2016, they adopted a new Public Procurement Code containing Article 34 which specifies GPP provisions. In the regional level particularly for the Friuli Venezia Giulia Autonomous Region, the respondent

mentioned about the Regional Sustainable Development Strategy and Regional Action Plan. Belgium, on the other hand established their National Action Plan on GPP in 2009 but started earlier measures beginning from 2000 on sustainable procurement.

Furthermore, aside from transposing other provisions of EU Directives on vehicles, for instance, to the legal frameworks of the countries involved, the influence of overarching international policies also plays a big role on how national policies are shaped.

Table 3 lists down the policies and legal framework concerning GPP or SPP mentioned by the respondents for their respective territories.

Table 3

Country	Legal Frameworks or Policies Associated with GPP
Belgium	National Action Plan, Sustainable Public Procurement Circular
Czech Republic	National System of Ecolabels, Government Resolutions on GPP
Finland	Programme for Sustainable Consumption and Production, Government Decision-In-Principle on the Promotion of Sustainable Environmental and Energy solutions (cleantech solutions) in Public Procurement 13.6.2013, Hankinta-Suomi 'Procurement Finland', Governmental program by Prime Minister Sanna Marin
Hungary	Act CXLIII of 2015 on Public Procurement
Ireland	GPP circulars, Green Tenders Action Plan, Circular Economy Action Plan
Italy	National Action Plan, Public Procurement Code, Sustainable Development Strategy, Regional Action Plan
Netherlands	Manifesto on Sustainable Public Procurement, Sustainable Public Procurement Strategy
Spain	Legal framework present but not specified by respondent
Sweden	National Public Procurement Strategy

Note: Created by author.

4.1.2 Presence of a Central Procuring Authority

In some countries, there exists a central procuring authority that supports the purchasing transactions and frame agreements of institutions. In Hungary, they have the Directorate General for Public Procurement and Supply (KEF) for central government agencies while Ireland has the Department of Public Expenditure and Reform. In Sweden, there are also organizations which makes agreements on behalf of government institutions and municipalities. A regional buying entity is also doing frame agreements in the Friuli Venezia Giulia Autonomous Region in Italy.

4.1.3 Environment Management Systems, Ecolabels, ISO

Ecolabels seem to be the most preferred environmental certification approach by the respondents. The Nordic label, French label, Blue Angel and European ecolabel were mentioned as well as FSC and PEFC labels for the wood sector.

For the services, EMS, EMAS and ISO 14001 are used. The latter is applied by many users according to the respondent from the Czech Republic while EMAS has limited coverage in Belgium, Ireland and Czech Republic. There is a growing interest to be EMAS-certified in Ireland as organizations made inquiries about it. According to the respondent from SYKE in Finland, a proof from the supplier is also sometimes acceptable.

Nevertheless, the respondent from the Netherlands also have this reminder for the procurers: *“So we mostly say that if you want someone to have a certain certification for your tender, then you would also have to accept similar certification or evidence even without the certification. So it's not allowed for me to say you need to have a Fairtrade, your coffee needs to be Fairtrade, because I would also have to accept other certificates even though for example, fair trade, and other coffee labels are very different in content.”*

While environmental criteria are mostly evaluated by public sector personnel, the presence of third party consultants for environmental certification in their countries were also mentioned by the interviewees from Hungary, Netherlands and Spain.

4.2 GPP Implementation

Details on the implementation of GPP in the organizations and countries of the respondents are presented in this chapter which includes the level of adoption, mandatory or voluntary nature of GPP, categories where GPP are applied, the actors of procurement and the initiatives executed.

4.2.1 Status of Adoption

An overview of the current status of adoption of GPP within the public administration and private sector is discussed in this section.

4.2.1.1 Level of Adoption in the Public Sector

While the overall outlook of GPP adoption is improving according to the interviews, it is important to note the several factors which shaped how it is implemented today. One of the notable ones is the global recession as recalled by the respondents from Ireland and

the Netherlands. Because of the crisis, the priority was on cost savings and the environmental matters took a backseat. Another major circumstance is the change of administration in the Czech Republic wherein environmental initiatives were also not treated as priority according to the respondent from its Ministry of Environment.

In the current setting, the status of adoption varies among the organizations interviewed.

In a recent study conducted to procurers in Finland, 70% of the respondents claim that environmental responsibility is taken into account. According to the representative of the SYKE Finnish Environment Institute, the research also shows that only 41% monitor the outcome of the tenders. The consideration of social responsibility given to transactions were also inquired with 58% result and only 32% doing follow-up measures. Moreover, it was also mentioned that large or even small cities *“maybe the front runners in this matter, but it's not systemic in Finland”*.

In Hungary, the Head of its Public Procurement Authority shared that 916 GPP procedures were conducted in 2019 totaling to HUF 119,8 billion . She added that *“12.6% of the public procurement procedures below EU thresholds applied environmental aspects”* in the same year.

In Sweden, the extent of adoption in its 300 municipalities is difficult to measure according to the representative of its National Agency for Public Procurement. However, he thinks *“many of the municipalities have also been frontrunners”*. He further added that he thinks in the governmental agencies, 95% *“have at least had one environmental requirement in their tenders”*.

In contrast, the respondent from the MANRA association in the Valencia Region in Spain stated that *“GPP is not very developed in our country”* but somehow mentioned that the regions of Extremadura and Catalonia have their own GPP manuals. Similarly, the representative from the Czech Republic said that the GPP awareness in his nation is *“still quite low”*. He also added that statistics from municipalities is difficult to obtain.

For the respondent from the Netherlands, he mentioned about the *“overarching policy objectives”* associated with the implementation of the policy and that it *“really depends on capacity and knowledge and ambition for local government”*. Nevertheless, he mentioned that he thinks the numbers shown on the yearly government reports about the criteria application status show *“we're not doing fantastic or anything”*. However, the Netherlands has been referred to multiple times by respondents from different countries signifying their high regard to the country's public procurement efforts.

In the case of Italy where it is compulsory to apply environmental requirements in the public administration tenders, no data is available yet as they just recently implemented a monitoring tool. However, their organization is very active in GPP development initiatives.

On the other hand, the respondent from Ireland mentioned that GPP is difficult to measure and its status of adoption depends on how it is defined and measured. Nonetheless, she stated that *“I think probably a lot of our procurement has some element of green in it”* because of current requirements from EU directives.

The respondent from Belgium also mentioned the lack of a clear monitoring system and indicators contributing to the difficulty of determining the adoption of GPP in the federal level. Even so, a voluntary self-assessment system which is currently filled up by 2% of procurers is being analysed for product group relevance among others. On the other hand, the cities of Antwerp, Brussels and Ghent are considered pioneers in GPP implementation. *“They even have their own action plans and they are doing really some interesting stuff from which we, as a federal government can learn from”*, the federal government representative added.

4.2.1.2 Level of Market Adoption

Majority of the respondents who work for the public sector expressed their perception that companies are more ready for GPP than the government. In fact, according to the respondent from Sweden, Swedish companies have been frontrunners in the market and that *“they were also encouraging green public procurement”*. In addition, the respondent from the Czech Republic cited the advancement of the private sector in environmental concerns specifically in the construction sector. *“They are ready because mainly they are multinational or international companies and they have to deal with much more strict requirements in other parts of Europe”*, he added.

Furthermore, according to the respondent from Finland, *“companies say that they are ready to provide more or to provide greener products and systems”*. However, *“the demand is still lacking”*. The representative from the NGO SMEUnited stressed that SMEs can enter into the market indeed to fulfill the demands. It is up to the procurer to publish the requirements needed. He added that *“SMEs are eager to get contracts”* whether *“it is GPP or not”*. However, many companies would be more interested if the procedures are less complex and costly.

4.2.2 Enforcement of GPP Policies

The interviews show that only Italy through Article 34 of its Public Procurement Law enforces the mandatory implementation of environmental criteria in all public procurement transactions. The policies of some countries on the other hand focus on the national and central government bodies and only recommends to the sub-national entities. A mixed approach is also reported where mandatory provisions are enforced to certain product categories.

In the Czech Republic, only a government resolution on GPP implementation is in place, termed as “*a gentleman’s agreement*” which is not legally binding and thus could only be taken voluntarily by the public sector agencies and municipalities. However, mandatory provisions are enforced for the IT and furniture product groups.

In another view, it is interesting to note that the Municipality of the City of Budapest Mayor’s Office imposes the application of sustainable and environmental criteria in all its procurement processes as shared by the Head of the Hungarian Public Procurement Authority.

The enforcement of GPP policies indeed vary in each country as revealed by the interviews as there are different legal frameworks, strategies and government structures that exist. In the case of Belgium, there is a complex institutional structure composed of one federal government and the regions of Walloon, Flemish and Brussels Capital City. According to the respondent from the Federal Institute of Sustainable Development of the country, each of these entities have their own competencies and priorities and some aspects are not compatible with each other. He stated that, “*the federal state cannot say to the regions, you have to do this or that*”, but they often collaborate and find common grounds in conformity with their respective policies and ministers.

4.2.3 Environmental Criteria and GPP Categories

While the application of green criteria in public tenders is a must in all product categories in Italy, the voluntary approach still remains to be practiced more in other countries. A mixed mechanism of applying mandatory GPP requirements to priority categories is also gaining traction.

In the Czech Republic, environmental criteria application is mandatory on IT equipment and furniture. The respondent from the Mancomunitat de la Ribera Alta in Spain shared their pilot GPP project on waste management where green criteria will be considered for instance on the vehicles to be used and the box materials. The wood sector is considered important in the Friuli Venezia Giulia Autonomous Region in Italy as well as in Belgium.

The application of criteria also varies in every organization. Most of the decisions are carried out based on what is the easiest to achieve with consideration to their available resources. Others are grounded on the institution's objectives. In the Netherlands, *“the government has different procurement categories where there's one person responsible for the whole government, and they all have their individual ambitions, sort of assignments to achieve”*, stated by the respondent from the PIANOo Dutch Public Procurement Expertise Centre. He gave an example of the food and catering category where reduction of waste and carbon dioxide emission reduction are some criteria to achieve the circular economy goal of the entire national government.

Sweden has *“around 50 different product categories and about almost 700 criteria”* and uses a prioritisation model incorporating market analysis and other views to identify where environmental criteria application could be most effective. In Finland, on the other hand, they identified the sectors on heat and electricity, energy consuming appliances and devices, transportation and vehicles, food and catering procurement, waste management, construction and reconstruction, and electricity procurement as the most important groups based on the carbon footprint calculations in their national level public procurement. Examples of criteria to be applied are *“energy efficiency, euro-norms in vehicles, origin of electricity, construction material, use of renewable energy, organic food products, environmental management system, non-harmful substances, eco-labels, recycling of packages”*.

On criteria development, some organizations develop their own while others refer to the guidance from the GPP toolkits of the European Commission. Other countries like Belgium, refer to the Dutch government's criteria on heavy motor vehicles while also looking into the EU directive on clean vehicles. They also did a consultation with stakeholders on how to adopt the European Commission's GPP criteria to the Belgian context. Similarly, the respondents of the organizations from the Netherlands and Sweden also mentioned they involve their stakeholders before tender publication. In the Netherlands, companies can be invited to an event where feedback could be obtained from the project information shared. The respondent from Sweden noted the importance of learning the thoughts of companies so *“before we decide on the criteria, we also set out for open consultation”*, he added.

4.2.4 GPP Ecosystem

The interviews show that there exists an active network of GPP practitioners in all countries involved. While some of these working groups or councils are composed of only public sector organizations, others have already engaged with the private sector and

other stakeholders while some are also part of programs funded by the European Commission.

The Netherlands and Sweden seem to have more interactions with the stakeholders as they involve them in workshops and dialogues for criteria development and other events. Meanwhile, Finland established the KEINO network-based competence centre in 2018 aimed to provide tools, networks and information on sustainable procurement and other associated knowledge to procurers. It is composed of six organizations in Finland representing research institutions, the business sector and association of Finnish municipalities among others.

Creating a procurers group with similar strategic sustainable targets has been mentioned by the respondent from Finland as one of KEINO's targets. Likewise, the Netherlands is starting a concept called Buyers' Group where they create clusters of organizations wanting to buy the same item and making strategic analyses. He considers it "*a strategy, a long term perception of how the market will develop and how we can get the best out of the market*".

In a broader sphere, the Department of Communications, Climate Action and Environment of Ireland works with partner organizations from other countries in a project called GPP4Growth. Another project called GPP-Stream has the Regional Department for Environment, Energy and Sustainable Development of the Friuli Venezia Giulia Autonomous Region of Italy and Mancomunitat de la Ribera Alta of Spain as partners together with five more organizations from other EU member states. These two projects are part of the Interreg Europe Program funded by the European Commission. The respondents from the three countries expressed their appreciation for the projects for helping boost the GPP adoption of their organizations through training, sharing of experiences, tools and knowledge.

4.2.5 GPP Initiatives

Most of the organizations act as the knowledge and network centers for Green Public Procurement. Capacity building initiatives such as training, conferences, webinars and workshops have been implemented. Guidance were also provided through websites, helpdesks, researches and other guide documents.

Efforts were also strengthened on acquiring the commitment of communities to sustainable public procurement. In the Netherlands, 160 of the 355 local councils signified support to the *Manifesto on Sustainable Public Procurement*, a new strategic initiative of the government established in 2016. Other organizations are likewise

working on making GPP policies more legally binding. Strategic initiatives such as the Buyers' Group in the Netherlands and the plan of Finland to have a similar one were also mentioned.

Furthermore, to keep the market engaged and updated to the GPP program of the government, market dialogues and consultations have also been conducted. The emergence of partnerships across organizations, regions and countries has been evident through Finland's KEINO network initiative, the Interreg Europe's GPP4Growth and GPP-Stream Projects, and other programs.

Aside from the national strategies and other policies, some of the countries interviewed have created special programs for the adoption of GPP or SPP. The Hungarian Public Procurement Authority for instance, launched "*2018 - The Year of Sustainable Public Procurement*" and "*Focus on Innovative Public Procurements 2019-2020*". The former featured two awards: (1) *Public Procurement Prize* for the most sustainable public procurement procedure and (2) *Public Procurement Award* for topics associated with public procurement. In Ireland, the *Green Government* initiative has commenced to enhance the engagement between the corporate world and the procurers through dynamic dialogues. Another interesting initiative aimed to change the mindset as shared by the respondent from the Regional Department for Environment, Energy and Sustainable Development of the Friuli Venezia Giulia Autonomous Region is about the *green behavior guideline* in their office which involved responsibly switching off of lights and leaving only one printer per floor instead of having one for each room.

4.3 Drivers of GPP Adoption

The next sections elaborate more on the factors driving the adoption of GPP as perceived by the interviewees. Based on the thematic analysis using the NVivo software, drivers of GPP adoption affecting both the public and private sectors which are organization-related have been mentioned most in the interviews as shown in Figure 5.



Figure 5 Drivers of GPP Adoption Percentage Distribution

4.3.1 Organizational Drivers

What drives the uptake of including environmental requirements in tenders is mostly an organizational matter as confirmed by the interviews. As the respondent from Ireland stated, *“you need the whole organization or many parts of the organization to collaborate if you're going to have successful GPP”*.

Political Support and Leadership

Most of the respondents acknowledge the key role of having supportive and committed leaders in the uptake of GPP in their constituencies. The respondent from the NGO SMEUnited said, *“if you want to progress through this you need to have a political understanding, a political will from the top”*. The respondent from Sweden agrees and mentioned that some municipalities have been encouraged to do much because of the support of politicians. In addition, the respondent from Ireland mentioned that, *“I think high level policy direction is very important, because you do need the whole organization behind the policy”*. Furthermore, the strong level of commitment of Finland’s leader is manifested in its current government program on carbon footprint and environmental footprint in public procurement according to the respondent from the Finnish Environment Institute. Organizations also need ministers who have high regards to the environment as mentioned by the respondents from the Czech Republic and Belgium. The latter added that this political will needs to be *“transformed into resources for people”*.

Organizational Change

Successful adoption of GPP or SPP requires the holistic appreciation of the organization to the value that this policy brings to them. As mentioned by the respondent from Ireland, *“they have to recognize that GPP is a very important way of influencing change”*. In addition, the respondent from Italy shared that, *“working with GPP means also spreading this idea, making it institutional, making it a priority”* and that *“it needs to become a value”*.

The objectives and ambitions of the organization also matter as shared by the respondents from the Netherlands and Finland. Aside from this, the procurers must have a change in mindset and attitude on concerns on the environment as stressed by majority of the respondents. Another point made by the respondent from the Netherlands is that, *“so, you create a sustainable organization that takes its leadership, but the way to get there is, I think the way to really enforce it, to get the people that don't really care about it on board, is to have them accountable”*.

Knowledge and Best Practices Network

The interviewees find learning from best practices and having a knowledge network as important drivers in the successful uptake of GPP. Both respondents from the Hungarian Public Procurement Authority proclaimed best practices as the most effective way to influence contracting authorities. In the case of KEINO competence centre, a network of six organizations which provides GPP information and experiences, the respondent from Finland stated that a decision was made to create it to *“connect our knowledge and work together so that we could actually do more when we were like a network, rather than single organizations trying to do the same and competing the same resources”*.

Moreover, the respondent from Finland mentioned about Procurers Group, where *“they will discuss in the group what kinds of sustainable targets they should build and put into their next tender competition”*. The respondent from the Netherlands also shared about the concept of Buyers Group which is similar to that of Finland's. He also mentioned that Sweden has it, as well.

“I think the community and the network is really important in building that across the country where people come and share their experiences and give others case studies of things that they have done”, the respondent from Ireland added. This gives inspiration and confidence to procurers to pursue the same as the respondents from Spain and the Czech Republic also expressed.

Moreover, respondents from Italy, Spain and Ireland whose organizations are partners in two of the GPP programs of Interreg Europe, applauds the help these networks bring to

their institutions. *“That’s the way to learn very fast”*, said our respondent from Spain, and thus, it is *“one way to boost GPP”*, added the respondent from Italy.

Capacity-building Programs

Organizations recognize the need to capacitate their people to push GPP adoption forward. A lot of initiatives on training, development of tools and systems and other ways of providing resources to procurers have been established over the years according to the interviews. The respondents from the Netherlands and Finland believes that capacity and knowledge indeed affect the implementation of GPP or SPP in the government. *“The most important thing is awareness”*, as affirmed by the respondent from Spain, as well as the *“need to equip people on the ground”* and *“sustained resourcing”*, according to the respondent from Ireland.

Frameworks, Plans and Policies

“In GPP, it's very important to consider the legal frame is the most important thing to start to deal with”, highlighted by the respondent from Spain. Most of the other interviewees also agree with this and the respondent from Italy added that, *“I think that our regional action program is quite important because it gives a framework to the action and it commits many departments of the region”*. Furthermore, according to the head of the Hungarian Public Procurement Authority, *“the issuance of guidelines increase the contracting authority's interest in the application of green criteria”*.

Local Government Involvement

Getting the municipalities involved is crucial in GPP adoption as mentioned by the respondent from Italy, underscoring it as a significant driver in their region. Moreover, visiting municipalities and providing them with help, according to the representative of the Ministry of the Environment in the Czech Republic is a good signal of the organization’s interest to them. A good competition between municipalities is also aspired by the respondent from Ireland. *“There could be a little bit of competition, and that one municipality would say that, oh, in Dublin they're doing this and then we want to do it, we can do it better”*, she added.

4.3.2 Market Drivers

The following are the factors which contribute to the increase of involvement of the private sector to produce more green products and provide wider range of green options according to the interviews.

Clear Signal from the Government

According to the respondent from the Czech Republic, the government needs to have a clear declaration about its environmental agenda, show commitment that it will really be done and should announce the details about the associated environmental requirements needed. There should also be a set schedule or term of its implementation so not only municipalities will adhere to it, but so that *“most of companies will get ready in time”*. He added that *“they will be pushed to invest anyway some years because there will be a legal requirement”*. Furthermore, adding more criteria to public procurement by the OGP as said by the respondent from Ireland is a good way in *“sending a signal to the market as well”*.

Easy and Inexpensive Access to GPP

According to SMEUnited which represents national SME and craft associations in Europe, *“if you want to have SMEs in this market, you have SMEs applying for such tenders, then you have to keep it so easy that an SME can perform it, this costs disappear”*.

Otherwise, *“if you have to bring in certificates which cost the demands of your company, then they will not be interested”*.

Corporate Culture

There appears to be a consensus among the respondents that companies are more willing to adopt to GPP. This notion is particularly prevalent in Sweden, as the representative of the National Agency for Public Procurement mentioned them as being the frontrunners in and that *“mostly, they’re asking for green public procurement”*.

More queries were also conducted by the private sector on GPP according to the respondent from Ireland.

Stakeholder Engagement

Connecting with stakeholders, is an important factor in GPP implementation as mentioned by the respondents from Sweden and the Netherlands who actively hold workshops and working groups with their stakeholders. Market dialogues have also been done by the other countries while others include them in their plans. The respondent from Sweden believes companies need to be heard also, *“because I think if you release a criteria that nobody needs, it can be a problem”*.

Incentives

The representative of SMEUnited recommends providing incentives to encourage GPP adoption in the EU member states. This is also supported by the respondent from the Czech Republic as he set an example on road repair where higher financing could be given to companies implementing environmental criteria.

4.3.3 External Drivers

Factors outside of the organization also play a crucial part in improving the adoption of GPP according to the interviews.

Green Culture

Instituting a green culture embedded by the motivation for climate change, sustainability and other factors is important in the crusade for GPP adoption as indicated in the interviews. *“Buying green goes beyond the public procurement”*, the respondent from Italy imparted. Additionally, pressure from citizens with this impetus could *“force public servants to change also to GPP”*, the respondent from Spain shared.

For early adopters of environmental initiatives like Sweden, the respondent representing its National Agency for Public Procurement disclosed that the application of environmental criteria to the public procurement is nothing new and that, *“it would be strange not to have it”*.

Global and EU Policies

“Priorities that have been put on the global policy domains, laws on budgetary savings, this has had a lot of implication also in the field of sustainable public procurement”, the respondent from Belgium remarked. In fact, the European Commission has been *“quite pushy”* on GPP and that *“they ask not only the Ministry of the Environment but also other ministries which will provide sources of financing for European funds, how they will implement green criteria or promote criteria in their programs”*, according to the respondent from the Czech Republic. Moreover, the respondent from Italy asserts that the partnerships of member states in the Commission’s GPP programs also drive the green procurement agenda.

Another noteworthy observation comes from the respondent of the Netherlands concerning how the overarching policies of international organizations like OECD, ILO, and UN influence the procurement approaches of organizations.

Presence of Experts

Consultants to provide expertise especially on the technical aspects of GPP are needed especially by SMEs according to the respondent from Italy. Moreover, having experts in public procurement and environmental processes is helpful to the organization as stated by the respondent from Spain.

In summary, the themes which emerged from coding the interviews and the corresponding factors fostering the adoption of GPP are found in Figure 6

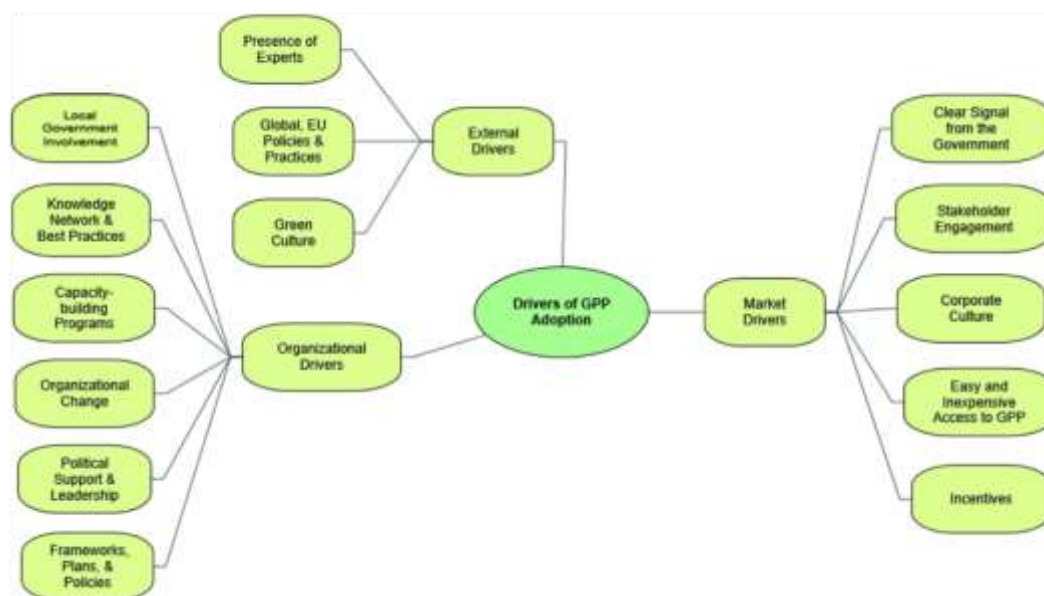


Figure 6 Thematic Map of Drivers of GPP Adoption

4.4 Barriers of GPP Adoption

Green Public Procurement involves not only the end users, procurers and agencies in the public sector but also the business sector who supplies the green services and products. Thus, the barriers cover both sectors with themes generated from the node analysis using Nvivo.

4.4.1 Barriers in the Public Sector

Similar with the drivers of GPP adoption, organizational factors were the most discussed barriers for the public sector followed by issues regarding GPP elements as shown in Figure 7.

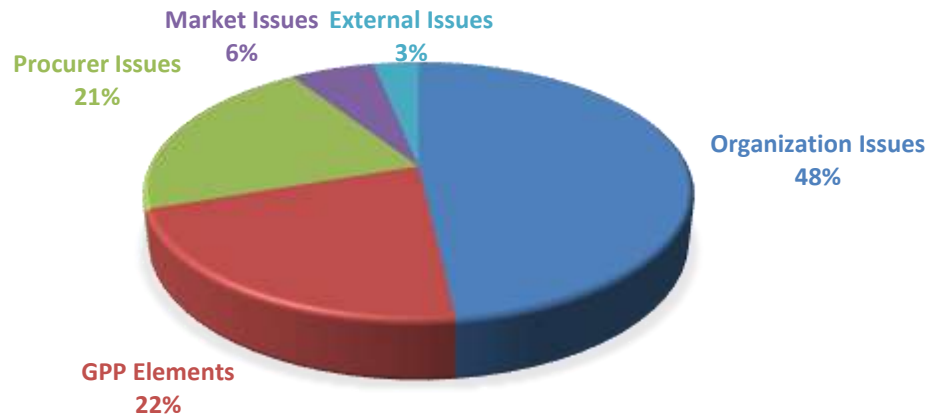


Figure 7 Public Sector Barriers Percentage Distribution

4.4.1.1 Organizational Factors

Culture Issues

The most mentioned organizational barriers are those with cultural associations particularly the low prioritisation of GPP in the public sector, lack of motivation and resistance to change among others.

Environmental or sustainability concerns according to some respondents were not treated as important because there are other issues that took the front seat. According to the respondent from the Federal Institute of Sustainable Development in Belgium, focus was “*more on professionalization of procurements and on dealing with the spend of procurements*”. He then mentioned the efforts of the Netherlands who invested millions for criteria development processes compared to “*about 50,000 euros and a few full time equivalents, professional people that are working on it*” in his jurisdiction.

The respondent from Ireland also referred to the Netherlands’ culture on the environment, and how “*everybody understands, everybody agrees that it is a priority*” compared to her country who treats GPP as a “*marginal concern*”. Because of this, there is a lot of persuasion to justify its implementation.

On the other hand, the resistance to welcome GPP or sustainability policies has something to do with their objectives or ambition about the environment, according to the respondent from the Netherlands. He also noticed that those who are doing the tenders are “*mostly not the young people that are ambitious about the environment*” and are therefore more

resistant to change as they have grown accustomed to their jobs. There also seems to be a lack of accountability, that *“there is no ownership at the project management level”*, he added.

In the case of Czech Republic, the respondent from the country voiced out the difficulty of implementing GPP in the previous years because *“the government changed and it was really environmental unfriendly”* and that the one in authority *“didn't do anything to support, to promote, to cooperate”*.

Information Issues

The interviews brought forth different angles of information woes in organizations. Lack of information appeared in most of the conversations followed by the presence of an information gap, lack of communication, too much information and misinterpretation.

Most of the respondents agree that there is still a lack of knowledge on GPP in their organizations. They are also aware that more needs to be done to make those involved obtain an increased level of understanding on the mechanisms of GPP, its benefits, how to integrate it to the procurement process, how to deal with the environmental criteria and how to define standards, among other topics.

Another point that emerged is how uneven the reach of GPP or SPP information appeared to be. Both the respondents from Belgium and Finland mentioned that although there are people, departments or municipalities that satisfactorily implement GPP, there are still some who have no idea what it is about.

Furthermore, some information relayed to the procurers are somewhat misinterpreted and the original purpose of the information is changed. *“So it seems that they are interpreting it and that they are changing the criteria and then they are putting it into their tender documents, a bit changed the way than the way that we have meant”*, the respondent from the Federal Government of Belgium said.

Lack of Resources

The interviews revealed that one of the common barriers to GPP adoption between the organizations is the lack of resources. This is more prevalent in the local level where there are not enough personnel, funds are limited and other resources are inadequate. In other cases, time is the most difficult resource to handle. *“It is more difficult because they don't have the knowledge, the resources, and they don't have the time to do it because they have only one person supposed to do all the procurement in the municipality”*, the respondent from Sweden confirmed.

Organization Size

Most of the respondents associate the lack of resources to the smaller municipalities as suggested by the previous barrier. Indeed, these local administrations encounter more challenges than their other counterparts according to the interviews. While bigger cities can afford hiring experts, some municipalities lack the resources as stated by the respondent from Sweden. The respondent from Italy mentioned how GPP has become more technical and due to municipalities having only a few personnel and multiple tasks, *“it is not easy to involve them in training”*. There could be a municipality with only two personnel, and *“they would hardly be able to perform even basic tasks”*, he added.

Monitoring Issues

Monitoring GPP has been a lingering point of discussion in the discipline as mentioned by the respondents. It is considered a persistent barrier due to the complexities associated with it. The lack of monitoring system, vague taxonomies and the absence of targets contribute to the difficulty of measuring the adoption of GPP in organizations. The interviews also suggest that the numbers obtained from counting the application of green criteria in the procurement, which is one of the common forms of monitoring GPP implementation does not signify the impact of the policy to the environment or the market.

Bureaucracy

The elements of bureaucracy discussed on the interviews pertains to planning issues, the complexities of the procedures in the public sector, ambiguous roles and having a slow decision-making process.

Long-term planning is a challenge according to the Head of the Hungarian Public Procurement Authority. The respondent from the Czech Republic supports this claim and mentioned that *“usually tenders are done in the very last moment”* which makes it a challenge to set environmental requirement and thus *“somehow limit the number of bidders”*.

In addition, the pace of decision-making procedures in the public sector is still slow according to the respondent from Hungary. Moreover, the respondent from Italy mentioned that *“bureaucracy could be a problem even for bureaucrats because all the tender procedure is becoming more and more complicated and more specialistic”*.

Furthermore, the respondent from Finland mentioned that *“it's very bureaucratic to make these decisions in municipalities”* and that *“there may be other people who plan for GPP but then there are others who decide”*.

Financial issues

Lack of money or limited budget appropriation for environmental initiatives seems to be a concern as mentioned by some of the respondents. According to the respondent from Finland, because there is still the lingering perception of green products being more expensive, procurers would say *“we can't afford it, or there is a budget cut, so we can't even consider it”*. Cost savings still is the main consideration according to the respondents from Hungary and Czech Republic. The latter shared, *“there is a mantra like, we have to save as much as possible or we will really justify why we invest more for public institutions”*.

Legal Issues

Because *“there are no obligations to add green criteria in the public procurement”* in their legal framework, the respondent from Spain considers this as one of the main barriers of adoption in his region. On the other hand, the respondent from Czech Republic sees not much adoption either in his country because of the recommendatory only feature of the existing government resolution instead of more binding legislation.

4.4.1.2 GPP Elements

This section contains the perceived characteristics of GPP which surfaced in the interviews and presumed to restrict its flow of adoption in the public sector.

Difficult

The interviews gathered the perception that GPP has complex requirements, technical specifications and has vague definitions of the concepts that is why it is difficult to understand, implement and evaluate. On top of that, GPP is also seen as diverse that is why there seems to be limited common ground for the different countries.

In the Czech Republic, even those considered experts in the procurement process with experience of more than 20 years see green criteria as a new concept. Although there is awareness on where to include green criteria in product groups, *“how to do that as a requirement, as an award, also how to change the market to include a product, those are the problems we are finding”*, remarked by the respondent from the country.

Time-consuming

As the respondent from Belgium put it, *“the sustainability issue is something which comes next to the normal procurement process”* so the procurers *“have to invest more time in its demand”*. That’s what the contracting authorities from Hungary also agree on. Moreover, the respondent from Italy also added that *“there is always the concern that by introducing new criteria you could possibly have delays in spending procedures”*. This could be a problem especially for the structural funds who have strict deadlines.

Risky

Green procurement, just like social or innovative procurement carries additional risks compared to the traditional way of purchasing goods according to the respondent from SMEUnited. One of the major fears of procurers as mentioned by the respondent from Czech Republic is the risk of being fined by the office in-charge of the free market or having to cancel a tender just because of adding extra requirements to the procurement. A possibility of getting lawsuits as an outcome of this also surfaced during the discussions. Furthermore, *“GPP also is often considered to be an audit risk at EU funded procedures”*, the respondent from Hungary added.

Expensive

GPP being expensive is a common perception that appeared in the interviews. *“They don’t see the lifecycle perspective, it’s only the initial price that they actually look for”*, shared by the respondent from Finland. Furthermore, because some procurers lack the expertise, an organization sometimes need to hire experts to validate standards or evaluate criteria adding more to the financial burdens of the institution, according to the respondent from the Czech Republic.

The paradigm of *“sustainable means more expensive”* could also have been influenced by the economic crisis, as financial savings have been the priority during its occurrence in 2008, the same time SPP was begun in the Netherlands, as stated by the respondent from the country. It continues to be an issue in other public sector institutions as contracting authorities also deal with limited resources.

Extra Work

The respondent from the Czech Republic captures this aspect of GPP clearly in the perspective of procurers as he explained, *“they don't have time to really deal with standard issues and now they will have to solve some extra thing”*. Some organizations from the Netherlands share the same sentiment as they say, *“we don't need to join this initiative from the national government, because we're already doing a lot”*, according to the respondent from the country.

4.4.1.3 Procurer Issues

The respondent from Finland believes that GPP adoption “*depends a lot on the procurer*”. That is why according to the respondent from the federal government of Belgium, there is a need to understand the procurers in order to find strategies to influence them. Based on the interviews, procurers encounter a lot of difficulties regarding embracing the GPP policy to their work. These issues are expounded in this section.

Availability Issues

As discussed in the previous section about GPP being “*extra*”, procurers could not seem to focus on dealing with environmental or sustainability criteria and other associated aspects of green purchasing because they are already engaged with other existing tasks. Because they have other priorities, they lack time in reviewing details of a tender or looking for greener options in procurement. This results to the work being “*superficial*” as mentioned by the respondent from Ireland. “*This means procuring, and all the others things that connects to it are superfluous, and this is why they put it aside from time to time and this certainly had some implications also for our policy domain*”, the respondent from Belgium noted.

Lack of Confidence

As drawn upon from the interviews, the lack of confidence of procurers originates from their lack of expertise on the technical aspects of GPP, the use of toolkits and systems and even the basics of linking GPP to the traditional procurement process. As mentioned by the respondent from Italy, there is a fear especially in the municipalities of not being technically able to evaluate the compliance of products to the standards. Moreover, procurers need experience and good examples to replicate to their own work.

Lack of Professionalization

Another barrier which came up is the lack of professionalization of procurers. The respondent from Ireland mentioned how the procurers from Antwerp in Belgium appear to be confident in dealing with the implementation of GPP. She added that in her country, you could work in one place and then transferred to another, thereby losing the opportunity to acquire the expertise needed on the task.

Being Risk-averse

Although some procurers seem to be aware enough of the GPP field, most of them are inclined to take the conservative way to avoid getting to court, as elaborated by the

respondents from Finland, Netherlands, Ireland and the Czech Republic. The latter added, *“the biggest barrier is that they are still afraid to ask any extra, not just environmental requirements, but even quality requirements because they are still afraid that the office which is responsible for controlling the free market procedures, that they will find them because they ask for other criteria and not just for price”*.

Lack of Support & Motivation

It has been mentioned in the Organizational Barriers section how GPP seems to be not regarded as a priority in some countries. The respondent from the Czech Republic affirms that if the minister is *“environmentally friendly”*, there is a tendency that the people in the ministry will follow green rules and buy more products with ecolabels. It is also a matter of accountability as stressed by the respondent from the Netherlands. He notably said, *“I think if someone that is responsible for making sure there are new roads and stuff is also responsible for CO2 reduction, then he would have to ask their procurement officer, like, how can I do this? How can I make sure that the stuff that we buy is the most CO2 reduction stuff available?”*

4.4.1.4 Market Factors

The perceived barriers concerning the market which hinder the swift adoption of GPP in public sector organizations are covered in this section. It is interesting that the market-related factors have not been as extensively mentioned during the interviews compared to the organizational barriers.

Lack of GPP-compliant Suppliers

Respondents from Italy and Sweden acknowledge that there seems to be an issue of not having enough suppliers in the countryside who could provide green products. This could lead to the possibility of grant cancellation according to the respondent from Italy. In fact, the respondent from the Czech Republic remarks that *“the office which controls the free market will say, no, there is only one producer, you can't ask for technology which is provided by just one producer”*.

Moreover, the respondent from Italy mentioned that this factor could be associated with the small market share the government holds for the companies. GPP compliance might require complex requirements which could opt companies to ignore green tender announcements as the government is not their main source of income. Furthermore, the procurers also need to demand what environmental requirements they want or the green products they need as stated by the respondents from SMEUnited, Finland and the Czech Republic.

Lack of Market Knowledge & Engagement

Another reason why there could be a limited number of GPP-compliant bidders is because of lack of communication between the government and the market as said by the respondents from Finland and Sweden. *“They don't know what kind of options there exist in the market and that's why they proceed as usual”*, mentioned by the respondent from the SYKE Finnish Environment Institute. The market seems to be ready (Respondents from Spain and Sweden) and could provide the requirements if necessary if only the procurers send out the signal. The lack of engagement with the market and other stakeholders could also be attributed to the difficulty in accessing them as commented by the respondents from Italy and Spain.

Competition & Data Protection Issues

Although market dialogues are encouraged in some organizations, there are still hesitations in sharing data because of confidentiality and competition matters as in the case of the Office of Government Procurement in Ireland. Nonetheless, the respondent from the country have had dealings somehow with the business sector.

Bidder Integrity Issues

Although just mentioned by one respondent, it is still worthwhile to mention that this issue exists. As shared by the respondent from the Czech Republic, *“If you ask for ecolabel but you don't have ecolabel, usually they send you this kind of column of paper and say this type of paper proves that it fulfills the criteria. Of course, a tender is money. Usually, the bidder will promise, will claim that he's in line with criteria or requirements, and it's not always true”*.

4.4.1.5 External Factors

The interviews also brought about external influences to GPP adoption which touched on unanticipated crisis and societal pressure.

Economic Crisis

While the past global economic recession in 2008 was mentioned in the earlier sections as having an influence on the cost perception of GPP or sustainability, the recent COVID-19 pandemic also raised concerns to some interviewees in terms of its possible effect to the green efforts already in place. Possible budget cut is one risk according to the respondent from Finland as the respondent from Italy also mentioned that structural funds are being checked for possible economic intervention. Green objectives could be of less

interest because the recent crisis could cause a “*shift to environmental rules*” as said by the respondent from Italy or possible “*corporate changes*” according to the respondent from Ireland.

Need for Societal Awareness

The green culture should not only be encouraged within the public sector or in the corporate world. As the respondent from Spain asserted, the citizens should also be involved and should “*include green criteria in their own life, that will force public servants to change also to GPP*”.

4.4.2 Barriers in the Business Sector

When it comes to the perceived factors hindering the adoption of GPP in the private sector, issues with the government administration surfaced with the most mentions followed by the internal barriers of enterprises as seen in Figure 8.

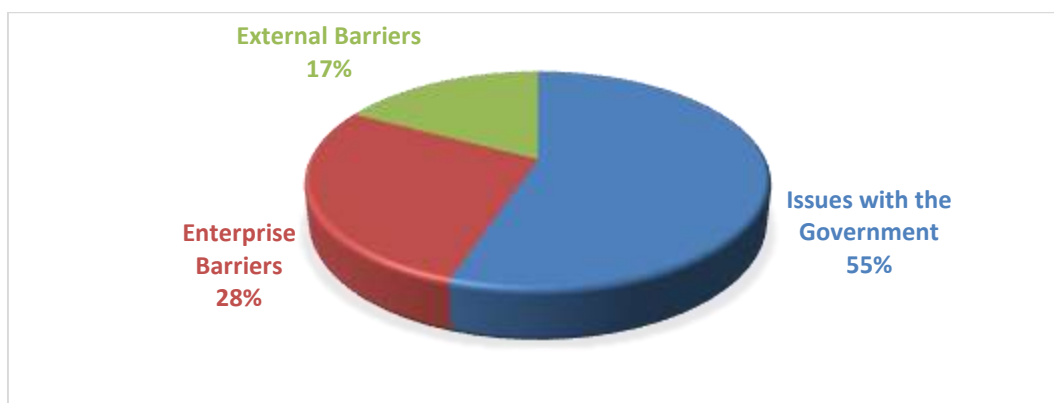


Figure 8. Business Sector Barriers Percentage Distribution

Although there is only one respondent representing the national organizations of SMEs in Europe, the respondents who work for the public sector also shared inputs based on their perspective and feedback they received from the business domain.

4.4.2.1 Issues with the Government

When asked what might be hindering the suppliers to adopt GPP, our respondents mentioned factors associated with the government such as lack of demands and difficult procedures.

Lack of Demand and Clear Signal

There is a need for the government to deliver a clear signal signifying its goals and demands so the market could act and prepare accordingly. This should be given “*some time in advance*” to give way for investments on the side of the supplier as stated by the respondent from the Czech Republic. The lack of dialogues between markets is also a barrier according to the respondent from Finland. She said the companies seem to be ready to provide greener products but the procurers need to ask more. Well-defined standards as said by the respondent from Italy could also be useful.

On the other hand, a sense of commitment and fairness could also be conveyed by the government to ease some concerns from the SMEs as mentioned by the respondent from SMEUnited, which states: “*some of our members are afraid that green public procurement also may be used to give advantages to certain companies, and therefore, we have to tell our SMEs to do green procurement but not misuse it for other political purposes*”.

Complicated and Expensive Process

One of the main feedback of their members on why they were not able to respond to green tenders according to the respondent from SMEUnited is that on the complicated nature of calculating lifecycle costs. Making the technical specifications simpler is recommended. This seems to be a challenge for them since “*they have difficulties to get access to the knowledge needed*”. Moreover, acquiring licenses or certificates and other administrative procedures also appear to be expensive and tedious.

Government Not the Main Market

For this issue, the respondent from the Friuli Venezia Giulia Autonomous Region of Italy shared a thought from a representative of the furniture association saying that the public administration is not a “main client”, therefore, “*if they have to change the production process to be able to participate in the tender, they prefer not to participate*”. This barrier appeared only once in the interviews but is a notable input nonetheless.

4.4.2.2 Enterprise Barriers

Companies also have issues of their own concerning their capacity to provide what the public sector requires concerning green tenders. This section briefly discusses the factors obtained from the interviews.

Capacity Issues

The respondents who gave remarks on this issue have the small and medium enterprises in mind. In Ireland where SMEs dominate the market for supplying goods to the public administration, the respondent from the Department of Communications, Climate Action and Environment recognise the probability of having capacity issues especially because of limited number of personnel and lack of expertise. She added that they might also lack marketing skills even if they have the right products. The respondent from Italy agrees that SMEs indeed need consultants to provide technical help.

The representative of SMEUnited confirms these observations from the public sector saying SMEs certainly have challenges in getting access to information and experts among others. He also added about the financial capacity of SMEs, underscoring “*they have difficulties to get financed, to finance the investments*”.

Company Size Issues

The size of a company could pose some barriers because of the abovementioned capacity issues. As the respondent from Ireland stated, “*I think there is a gap between a big national tender and then the small suppliers*”. As an example presented by the respondent from Italy, while small companies could have issues responding to tenders, big ones “*have office that is specialized in answering to the tenders*”.

Ambiguous Roles

According to the respondent from Italy, there appears to be an issue on who is representing a company to meetings with the Ministry of the Environment. The officials who take part in these dialogues seem to be not grounded with the operational awareness of the company

4.4.2.3 External Barriers

Factors that go beyond the grasp of the companies also came out of the interviews and are briefly described in this section.

Fear of Pandemic Effects

The current crisis created risks of changing the landscape for green purchasing adoption even in the private sector. The respondent from Ireland shared about the inquiries made by suppliers on getting certification for EMAS but this might change because of the pandemic. Economic uncertainty might lessen the interest of the business sector to pursue green initiatives.

Supply Chain Not Ready

An example about this issues is cited by the representative of the Friuli Venezia Giulia Autonomous Region of Italy, to wit: *“Once I spoke with a company, they are producing games for children, the ones that you put in the public parks. He said that certain kind of plastic that you need to be combined for GPP, you can only buy from one company in Spain. So, for them it's very hard because the supply chain is not always ready to comply to GPP.”*

In summary, the factors hindering the adoption of GPP in the private sector are found in Figure 9.

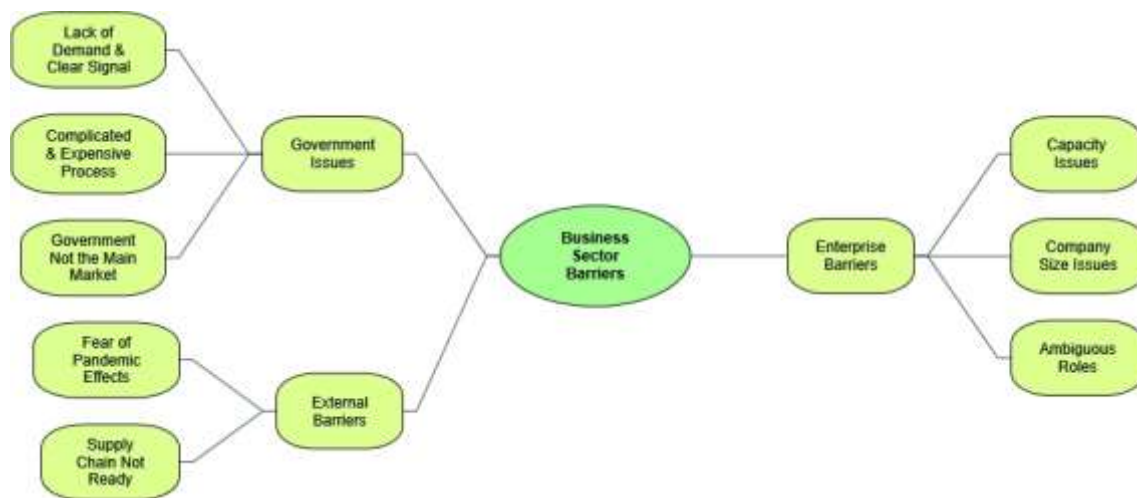


Figure 9 Thematic Map of Barriers for the Business Sector

4.5 How the Barriers are Addressed

Recognizing the presence of the barriers of adopting GPP, the respondents were then asked if these barriers are being tackled upon for possible solutions.

The respondent from Spain briefly summarized their plan of action which is on *“capacitation, implementation and monitoring”*. The other respondents similarly presented strategies with focus on training, coordination with other organizations and market dialogues. Finland’s KEINO competence centre shall *“provide tools for procurers on strategic management, network based development, information sharing and best practice examples”*.

Spreading the importance of GPP and its best practices are Hungary’s call of action and are achieved through publication of information on its website, other documents and on their Daily Public Procurement mobile application.

Moreover, planning on creating “*more legally binding instructions*” is also mentioned by the respondent from Finland. Dealing with the barrier on legal frame and including it on the Action Plan was also mentioned by the respondent from MANRA of Spain.

For the respondent from the Czech Republic, he will be coordinating with their Ministry of Regional Development to work out ways in providing assurance to the procurers about their GPP concerns. Continuing with the strategic Buyers Group concept on the other hand, will be the focus of the respondent from the Netherlands remarking, “*I think the time for just networking for networking’s sake has passed*” and that “*we also want to impart more knowledge and make sure it comes down to something tangible*”.

However, the respondent from the Federal Institute of Sustainable Development in Belgium personally thinks that the sustainability issues were not addressed for the past years and the attention was given more on procurement centralization and professionalization.

4.6 Evaluation of EU GPP Initiatives and Tools

Most respondents show appreciation for the initiatives done by the European Commission in strengthening GPP implementation in its member states. The respondent from Finland says that “*GPP is recognized as an important policy tool in many European level policies such as circular economy package*” and that the Commission seems to have “*promising initiatives*” such as the European Green Deal.

The respondents from Italy, Ireland and Spain whose organizations are partners in GPP4Growth and GPP Stream, both EU-funded undertaking of the Interreg Europe Programme are especially grateful for being able to learn from these form of knowledge network. The respondent from Spain, in particular, mentioned that it is a fast way to learn. He also added that “*the participation in the GPP-Stream process has helped the Ribera Alta to increase the knowledge about GPP, categories of green criteria, problems to be solved and the process to implement GPP*”. The respondent from the Ministry of Environment of the Czech Republic also mentioned how his organization benefited from the European funds availed by the Ministry of Social Affairs. He was able to take part in conferences and training and collaborated with them in the conduct of workshops to strengthen the knowledge of procurers on GPP in their country.

On recommendations for the European Commission on what still needs to be done, the respondent from Ireland stated that she thinks GPP “*needs to be mainstreamed across all its areas of activity so that it’s not just a specialization of the environmental directorate*”

and “*needs to be more front and central in the economic side as well*”. On the other hand, the respondent from Italy thinks more could be done for the structural funds.

Regarding the GPP Toolkits developed by the European Commission, some member states refer to them in their GPP implementation and mostly customise them according to the context of their countries. On the other hand, respondents from Sweden and the Czech Republic consider these toolkits outdated as longer time were invested on their development. The latter remarked, “*some links to pieces of legislation are not right anymore, or standards are not valid, or levels have changed*”. Some issues regarding practicality also arose (Sweden) along with the toolkit being difficult to use especially during the evaluation phase (Czech Republic). They also mentioned the following specific observations about the toolkits:

“For example, for computers they have linked it to the EU ecolabel, but the problem is that there are no computers that have the EU ecolabel.” (Sweden)

“An example, there is a European toolkit for transport and there are some requirements for buses and technology of engine and they ask for hybrid and just Volvo produced them in a very limited condition or amount. So, if any organization ... will go for full hybrid because European Commission guarantees that they are usable in all countries at this time and will ask for hybrid, they will have to probably cancel the tender because there will be no producer.” (Czech Republic)

4.7 Target Setting and Monitoring of GPP Application

It is interesting to note that when respondents were asked about the setting of targets for GPP adoption, either no concrete numbers were given or that they plainly said none were set.

The respondent from the Federal Institute of Sustainable Development in Belgium explains the reasons why their department decided not to set targets. He put emphasis on the lack of monitoring system and the associated indicators. There is also a need to understand the importance of criteria, whether they are mandatory or not, and the integration of clauses to comprehend the objectives of the targets. The respondent from Ireland added that it is contingent on how you define GPP and your yardstick.

Looking into the expenditure of procurements and counting the number of environmental criteria included in the purchasing procedures are the most common measures currently used by some of the organizations interviewed. However, while they did measure the

application of green criteria in tenders, the respondent from Finland expressed that it *“does not actually say anything about the real impact of the procurement”*.

The representative from Ireland shared that they are doing a *“kind of soft monitoring in terms of engagement with public bodies rather than hard data”*. The respondent from Sweden agrees that the figures do not necessarily reflect the effect on the market and that *“it's more interesting to work with strategic thinking and also looking at things on a larger scale”*. Although it is difficult, his organization pays more attention now on prioritizing criteria based on their effect to the market.

Another point made by the respondent from Ireland is the following:

“European Union similarly has struggled with measuring GPP. I suppose we haven't spent too much time worrying about measuring because there is so much else to do. We feel that if we tackle training, tackle guidance, communications and awareness, that at some point, the UN or the EU or somebody will crack the measuring and we'll go along with what they're doing, rather than trying to necessarily worry too much about measuring ourselves.”

On a lighter note, in Sweden, according to the representative from its National Agency for Public Procurement, the impact brought about by GPP has been reported from their food sector through the increase in number of ecological products. Economic benefits to the suppliers in the transport sector were also mentioned.

4.8 Future Direction

The field of Green Public Procurement has been mentioned more and more according to the respondents from Finland and Belgium. While other member states are still strengthening their GPP strategies, others are already incorporating their public procurement not just with green elements but also with sustainability and circularity components. In fact, the Netherlands has its *Circular Economy 2050* program in place and Sweden will also be releasing their circular economy plan. In Finland, the focus of their government is on carbon and environmental footprints in public procurement in the national level. For Hungary, the adoption of their National Action Plan on GPP is on top of their list.

The future steps mentioned in the interviews cover mostly on the development of strategies to improve GPP adoption. Plans on development of tools and systems to be used for monitoring have been highlighted as well as the continuation of capacity development initiatives for procurers. Building stronger links with stakeholders through dialogues and consultations are also foreseen together with learning more on best

practices. Hope for green leadership also surfaced in the interviews along with looking into creating more influence to the operational level of the public administration structure.

4.9 Recommendations and other Insights

The interviews produced significant insights to this study providing an encompassing view of the GPP adoption system in EU. The different interesting observations are listed on this section.

On best practices

There is still a sense of dependence on what the more advanced countries and international organizations will develop. Most of the respondents stated that they will check these initiatives and revise it according to their own national context. However, as mentioned by the respondent from Ireland, they invited an expert from the Netherlands but found that the tools he introduced do not fit to what their country needs. She also mentioned that it is difficult in her country culturally, unlike in the Netherlands where *"everybody just thinks green"*. Moreover, the respondent from Hungary also mentioned language as a barrier in terms of adopting the best practices of other nations.

Nevertheless, most of the respondents agree that building a community of people and organizations sharing best practices, knowledge and experiences is an important way to move GPP adoption faster. The respondent from the Netherlands recommends other countries to check on Sweden, Denmark, Norway and the Netherlands who are ahead in the GPP field.

On GPP and the Pandemic

The same concerns expressed by some of the respondents on the effect of the economic crisis in 2008 during the initial implementation of GPP surfaced in the interviews in the light of the recent Covid-19 pandemic as discussed in the previous sections. However, it is noteworthy to mention that the respondent from Italy was able to reach more officials for their online training because these webinars do not require people *"to move from their office"* and therefore *"don't lose their full working day"*.

On Joint Procurement

The respondents from Finland and the Netherlands opened up about their concept on organizing groups of procurers, with the latter even mentioning that Sweden has also a similar group. On the other hand, the respondent from Italy mentioned that small

municipalities could also procure together, *“but the population would not always be favorable about this move”*.

On making GPP mandatory

When asked about their opinion whether GPP should be mandatory, the respondents gave meaningful insights.

While the respondent from Ireland said that having some mandatory elements is good, the respondent from Sweden firmly said no with this statement:

“I don't think it will be so helpful to have mandatory requirements, because it doesn't say anything actually because if you have the wrong requirements, it will do no good. So it is better to work with effects and also focus on the follow up. Because if you have mandatory requirements but don't do any follow up, then you don't learn anything. I think follow up is more important.”

For the respondent from Netherlands, he has this to say:

“To be honest, it's irrelevant whether or not I think it should be mandatory because there is no way to make it mandatory. As you know, in the state law, it's not possible for us to mandate to local governments to apply it. But I think, that by creating a network and building this coalition, then that will become mandatory and normal. So that transition is happening.”

The respondent from Belgium said, *“it has to be more specific and more elaborate to really explain what this mandatory issue means in a practical situation and otherwise, at least it does not make much sense”*. Moreover, the respondent from the Czech Republic added, *“when it will be mandatory, of course it will be. If it's the right way, I'm not sure.”*

On lawsuits

While the fear of being fined or being brought to courts appeared to be one of the presumed barriers by the procurers and was highlighted by the respondent from the Czech Republic, some of the interviewees, whilst acknowledging that lawsuits indeed exist, shrugged off the issue as not that critical. In fact, the respondent from Sweden stated they made an analysis on this and the outcome identified *“it's almost never about the green public procurement, or because of the environmental criteria”* but other errors in the procurement.

On Prioritisation

Prioritisation is considered important by the respondent from Sweden and saying it could be started with the *“lowest hanging fruits”*. Interestingly, the respondents from Belgium and Ireland also mentioned the exact term with regards to how they deal with GPP implementation.

On long-term vision and goals

Rather than focus on numbers, the respondent from Sweden stressed that working on strategies to obtain goals is recommended. He also added to *“think far ahead and not try to do everything in just a couple of years”*. One of the goals should also be on investing on the capacity of procurers and not focus on saving money, the respondent from Belgium added.

On finding the “equilibrium”

The respondent from Italy mentioned about the challenge in finding the *“equilibrium”* on setting standards and making companies comply. This has also been covered on what drives the business sector to adopt GPP policies.

On professionalization

While the respondent from Ireland addresses the need for the professionalization of procurers, the representative of the Federal Institute of Sustainable Development in Belgium, on the other hand mentioned that one of the reasons why the barriers in GPP adoption are not tackled well is because priorities were given more on the professionalization of procurement and on spend analysis rather than on sustainability.

On size of administration

Although there are problems associated with small cities and small companies, they can be frontrunners in GPP adoption as stated by the respondents from Belgium, Sweden and Finland.

On Experimenting

Another interesting insight comes from the respondent from the Netherlands which says: *“Basically, the rules are, there's plenty of room to experiment and to try new things and to be creative. It's just that people need to not be so afraid of the rules and look for the room and flexibility.”*

On Optimism for GPP

Although their journey on raising awareness about GPP has some challenges, the respondents remain positive that GPP would linger because of pressure from the commission and other factors. The respondent from Ireland said: *“It's been quite a very positive experience, the last number of years. There has been much more positive engagement and we have discovered small projects that have been happening spontaneously around the country”*. The respondent from Spain also shared his thought: *“So there is still a lot of work but we are in the way. I am optimistic but it requires a lot of work.”*

The respondent from the Czech Republic also see a silver lining on the attitude of his fellow citizens towards the environment which is slightly improving. As he said, *“it will be evolution, not revolution”*.

4.10 Summary of Results

From the thematic analysis of the interviews, the researcher was able to extract themes distributed across three categories. A detailed list of nodes and the number of references made is found on the Nvivo Codebook in Annex C. The Files refer to the number of respondents who mentioned a particular factor or node. The references, on the other hand show many times a certain node was mentioned, and thereby coded.

Table 5 lists the top issues mentioned and referred to the most by the respondents while Table 6 shows the distribution of nodes mentioned by the respondents to a particular theme and factors. Monitoring issues top the list followed by the time issues of GPP and lack of confidence of procurers. It is interesting to note that the perception of GPP being costly has not been mentioned a lot.

Table 5

Top Barriers of GPP Adoption in the Public Sector

Public Sector Barriers	Files	References
Monitoring Issues	9	23
GPP Being Time-consuming	8	18
Lack of Confidence of Procurers	8	18
Culture Issues	7	22
Information Issues	7	21
Lack of Resources	7	15
Availability Issues of Procurers	7	15
GPP Being Expensive	7	7

Note: Created by author.

Table 6

Theme	Nodes	Be	Cz	Fi	Hu1	Hu2	Ie	It	Nl	Se	Sp	SME
Organization Issues	Culture Issues	x	x	x			x		x		x	x
	Bureaucracy		x	x	x			x	x		x	
	Financial issues		x	x	x				x	x		
	Information Issues	x	x	x	x			x		x	x	
	Lack of Resources	x	x	x			x	x	x	x		
	Legal Issues	x	x									x
	Monitoring Issues	x	x	x	x	x	x	x		x	x	
	Organization Size Issues	x	x						x		x	
GPP Elements	Difficult	x	x		x		x	x		x		
	Expensive	x		x	x		x		x		x	x
	Extra Work	x	x					x	x			
	Risky		x	x	x		x		x			
	Time-consuming	x	x	x	x		x	x	x	x		
Procurer Issues	Availability Issues	x	x	x			x	x	x	x		
	Being Risk-averse		x	x			x		x			
	Lack of Confidence	x	x	x	x		x	x	x		x	
	Lack of Professionalization	x					x					
	Lack of Support & Motivation	x	x				x		x		x	x
Market Issues	Bidder Integrity Issues		x									
	Competition & Data Protection Issues						x		x			x
	Lack of GPP-compliant Suppliers		x	x				x		x		x
	Lack of Market Knowledge & Engagement			x				x		x	x	
External Issues	Economic Crisis			x			x	x				
	Need for Societal Awareness										x	

Barriers of Adoption Distribution

Note: Created by author.

As seen in Table 7 , there is lesser swarming of codes for the barriers in the business sector compared to the public sector. For this group, the lack of demand and clear signal

is the most discussed followed by the capacity issues of enterprises then the administrative burdens associated with GPP as shown in Table ____. It is important to note that the lesser number of codes for the business sector could be due to the limited representation of the private sector in the interview sample and the respondents from the public administration are more focused on issues with the public sector even if they also provided inputs with regards to the business field.

Table 7 Barriers for the Business Sector

Theme	Nodes	Be	Cz	Fi	Hu1	Hu2	Ie	It	Nl	Se	Sp	SME
Government Issues	Lack of Demand and Clear Signal		x	x				x	x			x
	Complicated and Expensive Process							x				x
	Government Not the Main Market							x				
Enterprise Barriers	Capacity Issues		x				x	x				x
	Company Size Issues						x	x				
	Ambiguous Roles							x				
External Barriers	Fear of Pandemic Effects						x	x				
	Supply Chain Not Ready							x				

Note: Created by author.

Table 8

Top Barriers of GPP Adoption in the Business Sector

Business Sector Barriers	Files	References
Lack of Demand and Clear Signal	5	9
Capacity Issues	4	4
Complicated and Expensive Process	2	6
Fear of Pandemic Effects	2	4
Company Size Issues	2	2

Note: Created by author.

Almost all the respondents mentioned that the main driving force in GPP adoption is through the knowledge and best practices network as shown in Table ____. Many respondents also agree that political support and leadership from the top is a major driver along with capacity-building mechanisms and stakeholder engagement.

Table 9

5 Discussion

5.1 Comparison of Results

Three of the respondents belong to the Green-7 countries with advanced level of GPP implementation based on the EU Report. The drivers mentioned by the interviewees correspond to the results of the report which is having strong political will, optimized use of tools and EMS among others.. Interestingly, the barriers also generated the same result.

The respondents mentioned a green culture, the government started early in the implementation of GPP, have established frameworks in place, supportive leadership and have an active network of stakeholders. In the criteria development process, they all involve the business sector through market dialogues and consultation and consider it an important factor in GPP adoption.

The other countries involved in the research defined their status of adoption as low and are implementing initiatives to improve it. Most of the initiatives done are still on the awareness level. Although there are guides, and publications and other materials produced, most of these are focused for the use of the public sector. One notable guide is the Green Public Procurement Guide for Public Sector of Ireland.

It is noteworthy that the countries of Italy, Spain, Ireland who have partnerships with other EU partners for GPP programs show high regard and optimism to GPP adoption. They even mentioned that this is the faster way to learn. The one from Czech republic, also benefitted with the funds from other agencies as they constantly involve them in their programs.

Common barriers

Although the awareness level of these countries are quite higher than their counterparts, they mentioned the same barriers on lack of resources lack of time, personnel and money. The size of the public administration constantly emerged from the interviews, mentioning small cities and municipalities have very limited resources which affects how they adopt to GPP or SPP.

5.2 Framework for the Drivers and Barriers of Adoption

Comparing the empirical results to the model after analyzing the data from the interviews, it is observed that there is indeed an influence of the policy environment to the adoption of GPP across the EU member states, which is consistent to the conceptual framework. The advanced implementers of GPP included in the study which are Sweden,

Finland and the Netherlands have long established their policies on environmental procurement. Sweden and the Netherlands, in fact, are moving towards circular economy compared to the other countries who are still strengthening their initiatives towards GPP engagement. For the first influence regarding perceived costs and benefits, Brammer and Walker(2011) found out that there is often a competition for priorities in organizations where the enforcement of sustainable procurement is voluntary. While this could be deemed true to some organizations, our data also shows that GPP-mature countries with voluntary instruments, for instance, Sweden and Finland need not compete with financial allocation since priority is given from the top leadership. Regarding familiarity with policies, the results also vary again. Although lack of confidence of procurers due to lack of awareness and expertise appeared to be one of the major barriers of GPP adoption in the public sector, some respondents also remarked that the procurers are already aware of the policy. They proceed with the traditional way of procurement because of several factors like being risk-averse and having other priorities. For the third influence regarding supplier availability, it was mentioned as a barrier especially for the small municipalities but was not considered a major factor for the uptake of GPP policies. The last influence mentioned for the model mirrors the result of the analysis, signifying political leadership as a key determinant of GPP adoption.

Although the conceptual model presented by Brammer and Walker(2011) captures the essential elements of the results of the thematic analysis done, the researcher suggests that additional components be included to optimize the value of the results as shown in Figure 10. The component on procurer behavior surfaced in the analysis with affirmation from some respondents that the uptake of GPP depends on the people on the ground. A sense of accountability as mentioned by the respondent from the PIANOo Dutch Public Procurement Expertise Centre could push the individual to apply environmental aspects to his or her performance, which in turn could probably influence the organization. On the other way around, the four previously mentioned influences can also affect how the procurer reacts to GPP policies.

Another element that was highlighted during the interviews stemmed from the characteristics of GPP itself. It could be time-consuming, expensive, difficult or risky depending on the perception of the organization or the procurement professionals. The researcher believes that there is a need to examine these GPP elements to see what could be done to change them and consequently reflect the recommendations on the national policies. For example, GPP being time-consuming is one of the major factors which evolved during the research. A premise could be that it could be due to lack of easier systems to use or because of individual factors.

Another component that could influence GPP adoption based on the data analysis are external factors like the presence of knowledge networks, the launching of international projects or most interestingly, the pressure from the society.

It is therefore recommended for further studies the incorporation of the concepts in the papers on sustainable public procurement behavior((Grandia, 2016) and psychological barriers to sustainable development (Preuss & Walker, 2011).

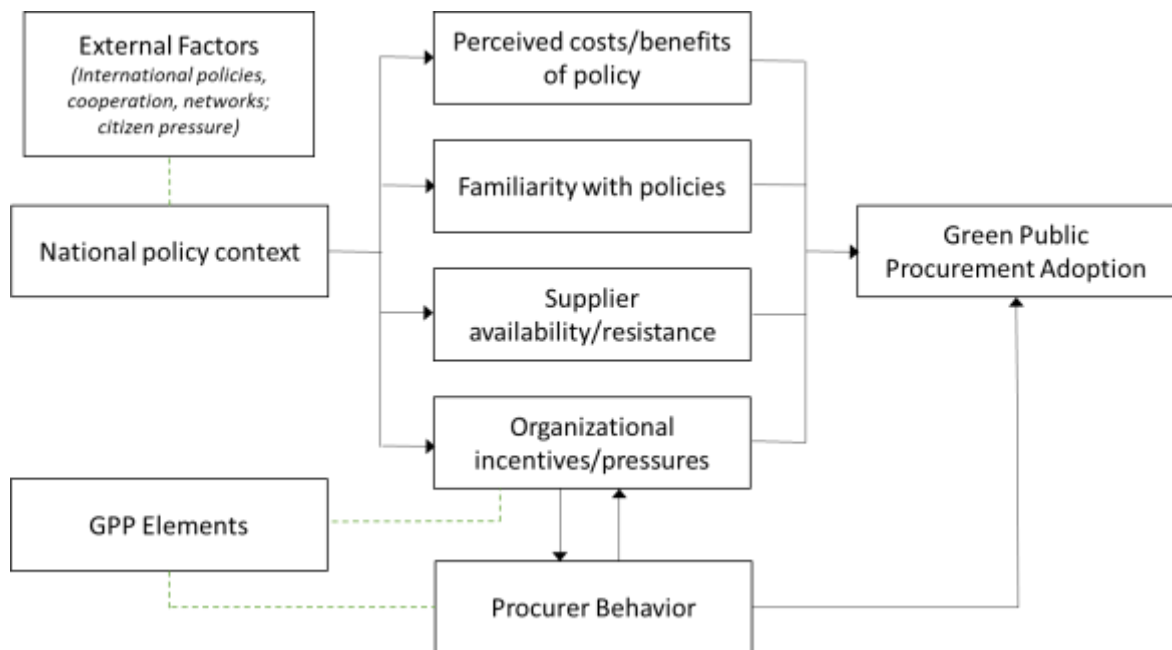


Figure 10. Proposed Conceptual Framework for GPP Adoption. Adapted from “Sustainable procurement in the public sector: An international comparative study” by S. Brammer, H. Walker, 2011, *International Journal of Operations & Production Management*, 31, p. 456.

6 Conclusion

6.1 Key Findings and Recommendation

Although the level of awareness on GPP and SPP has significantly increased over the years according to the interviews, it can be inferred that the adoption of green criteria is still fragmented in EU member states. GPP contains diverse elements and its implementation differs in every country or organization. The members of Green-7 whose organizations have already established policies seem not to have issues with awareness anymore. They focus on expanding their networks and capturing the real impact of environmental procurement. The study also suggests that the enforcement of implementation as voluntary or mandatory does not offer a clear connection to adoption.

Another point, as observed in the interviews, majority of the respondents answered that there were no targets set since there seems to be a lingering confusion on the definition of GPP or SPP, the standards associated with it and the methods of measuring its impact and adoption. Although there are initiatives on spend analysis and the percentage of inclusion of environmental criteria on tenders, the respondents suggested that these are not concrete evidence of the effect of GPP. They said not to focus on numbers but on the possible effect and the attainment of objectives.

Furthermore, the maturity levels of the member states vary which means the methods of intervention should also be strategically fit to each country's needs. While some countries are still struggling to adopt the basic GPP policies, others are already incorporating sustainability and circularity to their procurement processes. The level of maturity of member states is also difficult to assess because of a complex monitoring system.

The results of the research identify the need to check on GPP elements and the behavior of procurers as they have a substantial impact on the flow of transactions within their organizations. Even if policies are in place, other factors should be considered especially the behavior of procurers. The presence of networks is also an important finding of the research.

6.2 Research Contribution

This research hopes to be able to draw some new understanding on the complexities of GPP adoption across EU member states. The themes which emerged from the analysis especially on the issues of procurers and the GPP elements could provide another facet to guide policies and future strategies.

6.3 Research Limitation

The research has limited sample for the business sector and would make an uneven distribution of analysis. The study is also cross-sectional and only provides a snapshot of the activities associated with the uptake of GPP in their organizations.

6.4 Suggestion for Future Research

The researcher wishes to delve more on the interconnectedness of the drivers and barriers. It is interesting to note how several factors in GPP adoption interconnects with each other. As an example, the GPP element of being time-consuming connects to barrier of lacking resources and then because GPP is not considered a priority. It is therefore suggested to apply Causal Loop Diagram (CLD) for the barriers and drivers for further research. It is also recommended that more research will be done regarding the influence of the EU-funded programs to GPP adoption.

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Appendix

A Interviewee Profiles

Interviewee	Name	Organization	Position	Country
BE	Jo Versteven	Federal Institute for Sustainable Development	Expert, Sustainable Public Procurement	Belgium
CZ	Daniel Hájek	Ministry of the Environment	Deputy Director, Financial and Voluntary Instruments Department	Czech Republic
FI	Katriina Alhola	SYKE Finnish Environment Institute	Senior Researcher, Centre for Sustainable Consumption and Production	Finland
HU1	Gabriella Havas-Kovács	Hungarian Public Procurement Authority	Head of Department	Hungary
HU2	Julianna Batta	Hungarian Public Procurement Authority	International Legal Advisor	Hungary
IE	Bernie Kiely	Department of Communications, Climate Action and Environment	Assistant Principal, Waste Policy and Resource Efficiency Division	Ireland
IT	Nicolò Tudorov	Regional Department for Environment, Energy and Sustainable Development of the Friuli Venezia Giulia Autonomous Region	Head of Office, Office for EU Programming and Sustainable Development	Italy
NL	Milan Bijl	PIANOo Dutch Public Procurement Expertise Centre	Consultant, Sustainable Public Procurement	Netherlands
SE	Joakim Thornéus	National Agency for Public Procurement	Sustainability Specialist	Sweden
SME	Gerhard Huemer	SMEUnited	Economic Policy Director	EU-wide
SP	Víctor Rey Calatayud	MANRA (Mancomunitat de la Ribera Alta)	Communication Technician	Spain

B Interview Guide Questions

Interviewee Profile

Name:
 Position:
 Organization:
 Country:

GPP Background

1. When and how did GPP initiatives in your country start?
2. Do you have a National Action Plan or a similar policy or legal frameworks in compliance to the European Commission's directive? Could you please provide an overview of them?
3. What is the role of your organization in the development of GPP initiatives?
4. What is your role in this initiative?
5. What were the initial mechanisms done to stimulate GPP adoption?
6. Do you follow a centralized procurement model?

GPP Implementation

Status

7. What is the current status of Green Public Procurement adoption in your country? To what extent has it been implemented?
8. Could you please provide the targets set and the percentage of accomplishment?
9. What is the percentage of GPP with regards to GDP and the public procurement expenses?

GPP Ecosystem

10. Which organizations are involved in the implementation of GPP? What are their roles?
11. Is there a council coordinating all the stakeholders involved in GPP?
12. What is the level of engagement of the private sector with GPP?

Categories and Environmental Criteria

13. To which categories is GPP implemented in your country?
14. Do you have priority sectors for GPP implementation? If yes, how are these ranked and who decides about the final priority list?
15. What are the main environmental criteria included in the tenders?

Evaluation and certification

16. What certifications are being applied in GPP in your country?
17. How do you evaluate the environment criteria as submitted by the bidders versus what were defined by the organization?
18. Do you focus on just the product or service, or do you also check for the existence of an environmental management system used by the supplier?
19. Who makes decision in the awarding of contracts?
20. Were there instances when bidders complain about how the environmental criteria were evaluated?

Transition, Drivers and Barriers

21. How did the transition towards GPP go?
22. What drives the successful implementation of GPP in the country?
23. What have been the barriers in the adoption of GPP?
24. How are these barriers addressed?

Impact and Future Plans

25. What have been the impact of the implementation of GPP in your country?
26. How do you monitor and evaluate these impacts?
27. What is the future direction of GPP in your country?
28. Do you think it should be mandatory?
29. How satisfied are you with the efforts of the European Commission in GPP development?
30. Are the toolkits and other information materials enough? What do you think still needs to be done?
31. Are there further recommendations and insights you want to share?

C NVivo Codebook

Name	Files	References
Barriers- Public Sector	11	251
Organization Issues	11	121
Monitoring Issues	9	23
Culture Issues	7	22
Information Issues	7	21
Lack of Resources	7	15
Bureaucracy	6	14
Financial issues	5	12
Legal Issues	3	8
Organization Size Issues	4	6
GPP Elements	10	54
Time-consuming	8	18
Difficult	6	14
Risky	6	8
Expensive	7	7
Extra Work	4	7
Procurer Issues	10	53
Lack of Confidence	8	18
Availability Issues	7	15
Lack of Support & Motivation	6	11
Being Risk-Averse	4	6
Lack of Professionalisation	2	3
Market Issues	8	15
Lack of Market Knowledge & Engagement	4	6
Lack of GPP-compliant Suppliers	4	5
Competition & Data Protection Issues	3	3
Bidder Integrity Issues	1	1
External Issues	4	8
Economic Crisis	3	6
Need for Societal Awareness	1	2
Barriers- Business Sector	6	28
Government Issues	5	16
Lack of Demand and Clear Signal	5	9
Complicated and Expensive Process	2	6
Government Not the Main Market	1	1
Enterprise Barriers	4	7
Capacity Issues	4	4
Company Size Issues	2	2
Ambiguous Roles	1	1
External Barriers	2	5
Fear of Pandemic Effects	2	4
Supply Chain Not Ready	1	1

Drivers of GPP Adoption	11	131
Organizational Drivers	11	75
Political Support & Leadership	8	18
Organizational Change	6	17
Knowledge & Best Practices Network	9	16
Capacity-building Programs	8	14
Frameworks, Plans & Policies	6	7
Local Government Involvement	3	3
Market Drivers	9	32
Stakeholder Engagement	8	11
Corporate Culture	7	9
Clear Signal from the Government	4	6
Easy and Inexpensive Access to GPP	1	4
Incentives	2	2
External Drivers	8	24
Green Culture	7	14
Global & EU Policies	4	7
Presence of Experts	2	3
GPP initiatives	9	132
Monitoring context	9	50
Impact or benefits context	8	34
Voluntary or Mandatory enforcement	9	30
Ecosystem	9	26
Implementation status	9	25
Systems, Tools	8	20
Green Culture	8	16
Circular Economy context	6	15
Sustainability, Climate Change context	5	14
Targets context	7	13
Law suits	8	13
Data	5	10
COVID-19	4	9

D GPP Targets of Selected Countries

Country	GPP targets
Belgium	<p>Flanders: - 100% SPP at level of Flemish Region by 2020; - procurement of 100% green electricity for the region's buildings.</p> <p>Brussels Capital Region: Target are defined every 3 years. Targets by 2017 are: - 20% of financial volume of public procurements 20% of the (number of) public procurement with environmental clauses</p> <p>Wallonia: 100% SPP for 3 targets (banning social dumping, SME participation and effective maintenance of resources)</p>
Czech Republic	By the year 2014 -2020 25% of all vehicles of state and public services should use alternative energy
Finland	National level in all government procurements, the goal is a comprehensive solution, which promotes energy and environmental goals and utilises cleantech solutions in the most economically advantageous way. More detailed targets for different product areas: food and catering, vehicles and transports, construction, energy, services, energy related products.
Hungary	
Ireland	50% of procurement by value or 50% by volume
Italy	<p>National level Under art. 34 of the Legislative Decree 50/2016 on public procurement and concessions, as amended by art. 23 of the Legislative Decree 56/2017, the application of the Minimum Environmental Criteria set within the GPP NAP is mandatory for all kind of contracting authorities, for the whole value of the tender, and also for procurement below the threshold amounts fixed by the Directives on public procurement and concessions.</p> <p>Sub-National level: The mentioned obligation applies to all kinds of contracting authorities.</p>
Netherlands	<p>Federal government and government agencies - 100% realization 99,8%</p> <p>Waterboards - 50% Realization 85%</p> <p>Provinces - 50% realization 96% Municipalities - 75% realization 87-90%</p>
Spain	National level Levels of green purchase between 25% and 100% depending on the product group and implementation phase. 8 product groups have been included, according to the priority groups of the EU Commission, along with a timescale for achieving specific targets. Targets for consumption reduction and energy mix have also been set
Sweden	

E GPP Monitoring Data of Selected Countries

Country	Monitoring
Belgium	<p>National: A first set of test-questionnaires to the federal services was sent out in March 2010. Since the Circular of 2014, several paths for structural monitoring are discussed and some are implemented: (1) reporting of strategies on SPP in the federal departments by reports of the Commission of Sustainable Development (destined to the government and the federal parliament), (2) monitoring by the federal accounting system FEDCOM, (3) monitoring of the products bought via central procurement, (4) monitoring by the database on the publication of the national tender documents etc.</p> <p>Flanders Region: Pilot ongoing + decision to roll out electronical system from 2017 to monitor and manage tenders</p> <p>Brussels Region: yearly monitoring of the GPP. Every 3 years, results (based on the 3 yearly monitoring) are compared with the targets.</p> <p>Walloon Region: monitoring questionnaire on GPP was sent out in 2012. A working group on the monitoring of SPP has been set up in 2015.</p>
Czech Republic	<p>Ministry of the Environment will collect data about GPP on the central level by statements of procurement of “Green responsible products” which are will be sent by other bodies by 2018. Other data are obtained from “Information system on public contracts” which was modified according this goal.</p>
Finland	<p>Monitoring by examining tender calls and by questionnaire in 2012 and 2017. Around half of the municipalities considered sustainability goals in their procurement strategy or other procurement instructions. Sustainability goals are often set at a fairly general level and only around one fourth of the municipalities had defined more detailed sustainability criteria in their procurement strategy or instructions.</p>
Hungary	<p>The Public Procurement Authority compiles the statistics of Hungarian public procurement procedures based on contract award notices. The national standard form (which is obligatory below the EU thresholds) of the contact award notice includes data fields where contracting authorities can indicate if the procurement has included social and or environmental clauses as contractual clause/award criteria/ as part of the technical specifications/ as environmental measures within the framework of the selection criteria / as a compliance with environmental management schemes within the framework of the selection criteria. However as EU standard forms do not include such data fields these statistics contain only green procedures launched above national threshold and below EU threshold. In 2015 contracting authorities below the EU threshold used environmental aspects in 9% of their procedures, expressed at valorem 18%.</p>
Ireland	<p>No monitoring is currently underway. Responsibility will be shared between the Dept of Communications, Climate Action and Environment, The Environmental Protection Agency and The Office of Government Procurement.</p>
Italy	<p>An electronic monitoring system is in place since 2010 but no useful data were collected by it. Legislative Decree 56/2017 states that the National Anticorruption Authority (ANAC) must monitor the application of Minimum Environmental Criteria. A specific cooperation with National Anticorruption Authority has been proposed by Ministry of environment on this topic.</p>
Netherlands	<p>Results of GPP monitoring carried out in 2008: municipalities 44%, provinces 34% and central government 51% The most recent monitoring</p>

	took place in 2010. The follow up is a policy evaluation, planned in fall of 2013
Spain	<p>General Administration A monitoring of the NAP, through a questionnaire, has been conducted during 2010 and 2011. The results of these monitoring are available at: http://www.marm.es/es/ministerio/planes-y-estrategias/plan-de-contratacion-publica-verde/default.aspx. Second report on the State of Green Public Procurement in the General Administration of the State: broad levels of compliance with targets and objectives set in the GPP NAP (2008-2015)</p> <p>2. Autonomous Communities In the Basque Country, an annual monitoring on the state of implementation of the Government agreement is carried out. A specific pilot project based on the EU monitoring study with 7 public administrations was conducted in 2009.</p> <p>3. Local Entities Barcelona is a pioneer city in monitoring its GPP achievements following the main indicators proposed by the CE on its "Collection of statistical information on GPP in the EU". 96% of the expenses and 71% of the tenders of the priority product groups include green criteria (paper, cleaning services, IT equipment, transport, furniture, electricity, food and catering services, textiles and gardening products and services). In addition, some of the economically most important contracts also include environmental clauses, such as the waste collection and urban cleaning services, traffic lights, outdoor lighting or fountain maintenance</p>
Sweden	<p>There is no general monitoring of the percentage of public procurement procedures incorporating green criteria out of the whole volume of procurement at national level. However, there are examples of studies limited in scope. For example, the National Agency for Public Procurement has carried out a minor study based on approximately 600 tender documents for 30 selected product groups. The result showed that 90 percent of the tender documents analyzed contained some form of environmental criterion, either criteria from the National Agency for Public Procurement or criteria developed by the contracting authority.</p>

F Interviewee BE Transcript

Interviewee : Jo Versteven
 Organization : Federal Institute for Sustainable Development
 Position : Expert, Sustainable Public Procurement
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GM: Can you please tell me the background of your organization and your role in it?

JV: I'm working from 2002 for the Federal Institute of Sustainable Development. This is an institute that has changed already two times its name in this long period. Its tasks are especially on the coordination of policy in sustainable development. It prepares plans on sustainable development by doing consultations between stakeholders, by doing meetings with other departments especially at the federal level, and in collaboration sometimes with regions. Then we give the policy to the government, policymakers for approval or adoption of the plans. Afterwards is the execution of the plans where we do the coordination of in collaboration with the other federal departments. I don't know if you know how the institutional framework in Belgium is built up. It is a bit complex. Normally you have the state and then you have the local entities. In most countries, it is like that, but in countries like for example, Germany, they have something in between, the Lander. In Belgium it is more or less the same. I will not go in every detail. The broad picture is that we still have a federal state which is competent for the defense, legal issues, finance, also for some aspects for environment, but not a lot. Then you have a lot of competences for which the regions are responsible. But these two are not compatible. So, a competence is for the federal government or it is for the regional government and this makes it that there is no higher hierarchy between the two. The federal state cannot say to the regions you have to do this or that, but we can collaborate and there are often collaborative meetings with the regions and the federal level. This is more of a democratic procedure where we try to find something in between or compromise. So, this is important to understand because also for green public procurement, we initialize a lot of things from the federal government on, but then it is always in collaboration with regions to see if they are implementing something that they want to do, that is in conformity with their own policy, their own ministers and not always as something like the federal state has said that we have to do this. This is not accepted in Belgium at the moment. To make the picture maybe a bit clearer, so there's one federal government, there is Walloon region, there is the Brussels-Capital City region, and then there is a Flemish region. This is I think, the most acceptable picture that you get from Belgium and then there's all the local, like provinces and cities and the towns et cetera. Okay, to answer your first question, of course, because I sometimes elaborate too much, so, I work from 2002 in the Federal Institute for Sustainable Development. In the beginning, I was especially responsible for the global sustainable development issues, but I think from 2008 on, I specialized more and more on green and social and innovative public procurement, which is under the heading of sustainable public procurement in Belgium. So, what I am doing especially is trying to see if we can develop some law on it that has been implemented. The last two years is especially on development of tools, about criteria files, looking together with enterprises. What we can suggest, also monitoring is important, especially trying to develop monitoring systems. This is a difficult issue as maybe you know also from other member states. A few years ago we also tried to work together. So that's not very easy, but we did also some work on it and a lot of colleagues of mine working on circular procurements. This is especially down in the regions that also we are trying to do from our institute from time to time.

GM: When did SPP start in Belgium? Is it out of compliance from the European Union directive or did Belgium just made its own initiative?

JV: This is a long history. I have some presentations for people who are interested in history. I will try to remember something that I still know, but I think the story already begun from about 2000 on, in which we had some measures and actions in the broader plans on sustainable development and about sustainable procurement. I think at that time there was some small group in Europe, the group of experts, especially the Scandinavian experts were there, the Netherlands also, people from Austria, Sweden certainly yes, and they were I guess, I remember the first group of something like the top five or top seven best performing countries at that time and they were especially exchanging information. This was more or less done in a sidetrack with the European Commission. We also tried to do something on criteria development. I think the big framework behind that time was kind of a policy document from the European Commission. I do not remember the year anymore in which it was stated that all the European member states should have a National Action Plan on GPP. And it was later on from year to year that more and more countries begin with the development and the approval by their government of this action plan. I think this was an important trigger also for us to start or to convince our ministers to work on it. So this was a bit the start of it all. Later, I think it was 2009, the federal government made its own National Action Plan and at the same time, the Flemish region had its own action plan and there were also some initiatives made by the Brussels-Capital Region. They had no action plan at the moment. But from a broad scene, it was accepted that the federal government had an action plan so Belgium also has an action plan.

GM: So, there's no common plan for the country?

JV: No. But from abroad, they said it is too complex, the Belgium situation. So we accept if the federal government has an action plan and then we said that Belgium has an action plan. But legally, it is a bit more complicated. But I think it is the same for a lot of other member states, for example, France. They also have a National Action Plan, but there are a lot of departments that have their own measures or action plans. The same for Germany, I think. So, the situation is also more complicated on the ground. For example, there are some big cities like Antwerp, Brussels and Ghent that are still important pioneers. From time to time, they even have their own action plans and they are doing really some interesting stuff from which we, as a federal government can learn from. From time to time also we collaborate with them to see how we can advance the plans in details.

GM: Did it start as GPP as stated in the European Commission's communication or did you use Sustainable Public Procurement from the start? Also, is circular procurement the next goal on procurement in the federal level?

JV: I think from the beginning and also from 2000 on, the decision was clear that this is about sustainable procurement. Sustainable always meant for us the three pillars of sustainability, so, as a social issue, the green issue and the economic issue. There was a lot of debates on what is the deeper meaning of the three pillars. For the green issue, it is quite clear that it is about criteria and development, about clauses. For the social issue, it became in the beginning at least a bit less clear. But from time to time, we saw that it was an issue on for example, people with disabilities, it was about ILO conventions, on work issues for countries who work in textile and in ICT and so on. But I think that there was a certain time in which we discovered that it was about seven subfields in the field of social procurement. And even with the publication of the European guide on social public procurement which is now in revision, I think, it is a nice overview of all the possibilities of social procurement and we have interpreted that and now we take it up in our own strategies also. The most difficult in all these years, I think, is the interpretation of what is the economic pillar. So, some thought it doesn't have to be interpreted because public procurement is already on something economic, it is the organization of procurement and the organization of the economy of the exchange of services and goods. So, this is already the bit an interpretation of what is the economic pillar. Later on it was more about corruption issues, the legal issues, the exact acceptance of the legal issues. But from our side and also the Department of Economy, we

thought that there were some opportunities about innovation. So, what we do now is try to see the economic pillar from what are the best available techniques in process or services, goods et cetera. This can be seen as innovative, economic and from this track also we see that the circular procurement is something which comes in for which we also see that there is a lot of discussion with the sector, the industry to see how the closed loops can be made as an alternative of more linear economy. And besides that, maybe also the discussion what do we do with the long productions change as we see them for example, in certain industry, in ICT and textile and so on with all the protocols that we have to deal with there. Again, to answer your question, it has always been the three pillars of sustainable development from the European perspective. So, there was a lot of pressure on the green side and other departments were working on the social side. But I think that especially DG environment made it to set the GPP policy.

GM: So you're officially using SPP in all your communications?

JV: For us, it is always SPP. From time to time we have more specific discussions on certain issues and then we are talking about social procurement or circular procurement. But on the whole it is especially sustainable public procurement as a strategy that we propose and in strategic documents mostly it is worked out in subsets, in chapters, that are dealing with the green procurement, social procurement and then circular procurement. What we see now in the last two years is that there is a lot of pressure on circular procurement. There is maybe even some tension between the idea of sustainability and circularity from our department. We still defend the sustainability issues because we think that it is not easily integrated into the new ideas of circular procurement, which is more about business techniques, processes, and things like that. With circular procurement, we think that, for example, the working conditions issue can be forgotten if there is too much stress on it.

GM: So, what's the status of the implementation of GPP in your country or in the federal level at least. Has it been implemented fully? For the EU, they had a target of 50% for all member states. Do you also have a target at the federal level?

JV: That's a good question. That's also a big difficulty that was anticipated a few years ago. It was questioned a few years ago. All the member states and also the European Commission said, okay, we have to fix targets, like for example 50% or even the Flemish region said we want to have hundred percent by 2020. Now we are 2020, so now the question is, have you reached the target or not? But what we have set from within the beginning is, if there is no clear monitoring system and if you don't understand what criteria are important, if they are mandatory, if they are not mandatory, if some clauses are integrated or not, and all those difficult questions that are around, we do not see how we can reach the target and have an interesting information on telling us you reached a target or you have not reached the target. So, this is why, we, from our department at least, did not follow the idea from we have to fix a target or we have to have a long discussion, so 40, 50, 60 or even 100 percent of green public procurement. Because at that moment, there was no monitoring system. There were no indicators and it wouldn't make sense to measure all the system at that moment. I think that this is still a problem in my opinion if you ask all the members, do you have reached the targets, the global target. Honestly, if you see what is behind the measuring systems, in my opinion, maybe the best that you can reach is if you can say, okay, we have studied the last three or five years, three or five product groups for which we have really urged from the department from the government to say that these criteria are mandatory. And then you check in every document that is published, if these criteria are in order and not only on a self-assessment mechanism, because it's the most used technique. Then maybe you can say something about it. But in reality, we see that there is so much complexity behind the monitoring systems that in my opinion, it is, except for some minor details, not really correct to say that the target is met or is not met. But I'm very interested in bolstering the development from the other countries. Are they doing the thinking? The monitoring discussion is also something which is going on very long time.

GM: For the categories in the federal level, are there specific mandatory categories or are they all voluntary?

JV: It is voluntary at the moment. So what we have from the point of view of the procurer, there is a circular on sustainable public procurement from 2014 and this is a strategic document which says that the procurers have to check all the possibilities to make their procurement as sustainable as possible. Then there are different fields that have been announced, like for example, the possibilities in the initial phases when they've checked their needs to see if there are possibilities to integrate sustainability into their own plans, to organize their procurement in one to six five years to see how they can eventually prioritize which categories are important for sustainability, which are not. These are possibilities but further on also very specific announcements of how do we have to take care of technical specifications in award criteria, selection criteria. How do you have to do to deal with sustainability. And this can be based on what the law is proposing, but not maybe also what procurers can do more than what law is proposing. So all kinds of more strategic recommendations for procurers and also then, coupled with its yearly updates that they have to do to the interdepartmental Commission on Sustainable Development to see how the implementation is going. You have to integrate this set of criteria for this category in all your procurements. This would be clear. For example, the most clear would be, for food products, you have to state in your tender documents that all the fish is from sustainable caught fish with the label and the seal or another kind of label. So, this is not something that we have a guide for sustainable public procurement in which all this is explained and is an important source for the procurers. They also work with it because we regularly do questionnaires to see if this instrument is used, and it seems that it is really the case and this taking up from time to time. We check also in the tenders that have been published. You see all that, that there are criteria on sustainability in their documents, but mostly it is not the way that as we policy makers have intended. So it seems that they are interpreting it and that they are changing the criteria and then they are putting it into their tender documents, a bit changed the way than the way that we have meant. So, we started also from what is happening in practice. If we are delivering the tools, would they take voluntary the tools into the practice. We see that is not working this way. So it is getting a bit difficult to say to the government, you have to make these criteria mandatory, because in practice, without that, it would be possible that this line of recommendations would be followed first and second, what do you do if they are not following?

GM: Are their priority categories that you're implementing with regards to GPP? For example, in some countries, they were focusing on waste management, food, or transportation.

JV: I can maybe try to share my screen. So what we see here is the website that is made under maintenance by our service (<https://www.gidsvoorduurzameaankopen.be/nl>). We have here all what is on regulation. So, lots of things. We are doing also some studies and projects. For example, we have done a study on standards, ISO standards. We have tried to check, what are the most sustainable standards that we have. So it's about a set of I think about 20,000 standards. And from this, we try to filter the sustainable standards. Of course, there is a lot of methodological questions behind the choices that have been made. But we thought that at least communication of some sustainable standards concerning some categories, are interesting for procurers to deal with it. Then further, there is the label issues that we are doing from time to time. So, we are checking what kinds of labels in Belgium but also abroad, in Europe can be used by procurers and is in conformity with the Law of Public Procurement, Article 54 which exists also in the European directive. Based on this I think that for the moment we have 50 or 70 different labels for which we have information. Then this is procurements. So, information about three pilot projects that we have done, information on monitoring reports that we have published. We also have done some collection of best practices in 2015. The three council called consultants are working on it now also to have an update on it. Life cycle costing we did a few years ago in the study on bioplastics. But this was already a long time ago. And then as you see here, we have the sustainability aspects which should have been developed into the social issues, the environmental issues and the innovation. The innovation is here especially. These are information texts globally,

which will be revised shortly by people that are working on it. To come back to the core of the site is all these different categories. A lot of them will be coming back also in the context of the European Commission or the other member states. But if you click on it, for example, here, we have transports, you'll see all different sublevels and here, if we have information, then we are referring to it, for example, this is paintings. Here, we give you information on where criteria are developed. For example, it is the Dutch region that has developed some criteria about it. So we give information of their website and also the European Commission did some work. So here we refer to the GPP toolkit. Sometimes we did some work ourselves. For example, cartridges. So, again the same structure and here we have criteria documents that have been produced by ourselves and then you have an overview of these documents. But I will not go into detail with you, but the structure is always the same.

GM: Is it some kind of toolkit?

JV: Yeah, it's always a document, sometimes it is 30 pages, sometimes it is more, 60 pages. But as a whole it explains here what is social public procurement all about, how it is referred to the law and what the different chapters of the law can be an inspiration for the procurement- in this case of cartridges. Then we are studying what is on the market especially, so here, the scope of the cartridge is what is meant by the cartridges. We see here the input impacts of the cartridge. So, it's about really a soft lifecycle analysis of the cartridges. And then here is the most important part of it, what the market says about it. This is based on desk research and on discussions with the sectors. We also propose what kind of labels, what kind of environmental systems are interesting. So, this is all kind of information on it and here we are explaining it giving you a bit more information on the labels that can be used by the procurers and here, we have the environmental management systems that can be used in the selection criteria, for example. We give also information if they are quite well available in Belgium. So, the EMAS for example, is not really available here or there are not a lot of Belgian companies that have the system. For example, the ISO 14001, some companies have this, maybe others not. And they serve the same for the product labels. What we see here is the Blue Angel. The Nordics one is a bit available in English. The European ecolabel for this product group is quite not available, but French label is quite good, available. And then a lot of information again for procurers and so on.

GM: It's very informative.

JV: Yeah. Sometimes that's the difficulty that we have because it is sometimes too informative and procurers have to do quick procurements often.

GM: They don't have time?

JV: No, that's a problem. Because you are very interested in the different categories, so what we have here is financial products. This is something really hot stuff for the moment and this is really going on the edge of sustainable public procurement because we see that maybe some other strategic projects have to be set up to make an advance in these fields. From the other side, we see more and more than all the money that is put in forms and so on. Something is of such kind in importance that we have to do something with sustainable financial products. So, we have to do some preliminary investments in autumn of last year. In a few months we will come on with new documents. This is the product group that we have developed so if you are interested you can also read. That's transport and mobility, clothing, textiles, cleaning and hygiene, construction and energy, house equipment, et cetera.

GM: They look similar to the EU categories. Are you also adopting the European Commission's GPP toolkits?

JV: These are the big categories. But if you see, for example, let's take transport here, you'll see that we have 20 subgroups that are behind. A few of them have clear links with the criteria from

the GPP toolkit, but others have not. Others are our own development or have been developed by the regions. From time to time also, we refer to what happens in the Netherlands, for example. What has been stated here is, this is about heavy motor vehicles. A few years ago, there are criteria that have been developed by the Netherlands and this is what has been set here. The Dutch government has developed criteria and you can find them here and at the same time we refer to the GPP toolkits here and then also there was the directive on clean vehicles from the European Commission. So, this is the clear legal information on the procurement of these vehicles by procurers. So, we are bringing all kinds of tools together just like an umbrella site a bit, we call it from time to time. Sometimes there's very specific information on it. From time to time, there is more broader information that refers to the work of our colleagues. So this means that all the work of the European Commission is integrated into it. That in contrast, for example, to the strategy that has been used by the Dutch colleagues a few years ago. So they set up a criterium process for the Netherlands at the same time as the European Commission did. At the time we have set from in the beginning, we do not have the resources to set up such important criteria processes in Belgium. So, we said that if the European level has developed something, we take it over, we will interpret it with our stakeholders. But we start not again with a lot of stakeholder consultations that will be reviewed for one or two years and then it has to pass the parliament. But, we have said what comes from Europe, we will look at it, we will discuss it with our sectors but we will go as quickly as possible with the kind of compromising documents or interpretation from Belgium and this seems to work.

GM: So your office is the one coordinating all the information?

JV: Yeah. Also, on the Flemish level, there's also some coordination. Also, on the Walloon level. I think we are regularly informed on what our colleagues are doing, or working on sustainable public procurement but all have their own specific working fields. For example, the Walloon region has worked a lot on the last years on how to integrate disabled persons or long time unemployed persons, by way of public procurement. Also, Brussels-Capital City, the service that is responsible for the unemployed, the payment of the unemployed people has seen the instruments of public procurement important as a help to put the unemployed people, again on the market and they have really very good data on that. By way of tendering processes, put away from this unemployment list and are again on the job market. The Flemish region invests a lot into green public procurement and now the last year especially in circular public procurement. What we are doing is a bit more of the umbrella work. From time to time we are checking if there are some soft fields in which we can develop something. For example, the financial products are an important work that we are doing at the moment, but also some other products like based on the plastic directive, single use plus plastic directive. We are now looking at how we can translate this into procurement documents.

GM: So, who's involved with the implementation of SPP? Are you also coordinating with the Ministry of Environment?

JV: There is a federal level minister of environment. It's a bit strange because from time to time we asked them to be present at our meetings but they are more involved in international policy domains and so on. So they think that the more practical implementation is something more for our departments. But from the other side, we are working also with the environmental departments in the regions from time to time. Also with the big cities, environmental departments, for the development and especially for the green issues, for the social and the circular issues. We are working together with other people.

GM: Is there a particular council for this?

JV: Yeah, there is a council. There is a working group on sustainable public procurement which is a national coordination between federal and regional level. So, if there are especially things that have to be discussed on who goes for example, to European meetings, then we are discussing this

into the national council. There we have also the contacts with other departments. But after a few years, it is quite a small group of about seven, eight, nine persons, I think, key persons, experts. We do know each other quite good and after few years we know very quickly if a question is coming, if it is a very specific question for a certain person or if it is really a strategic question for which we need to collaborate the answer from Belgium. And from that on, a lot of work. Last year's, it's done by email. When we are preparing our positions, or we are saying, can someone help for example, this person working in the city of Phoenix. Maybe to be a bit more clear, there are official organs and we are working with these official councils. But in practice, I think that a lot of advancement is made also by informal experts, meetings and email communication and so on.

GM: In your group, do you also involve the private sector, the businesses or non-government organizations?

JV: This is important. For the moment, not. So we are trying to keep the strategic questions or the questions about how to develop this website, for example. between departments. From time to time, we have also questions from businesses, how can we make publicity on your interesting website and so on. But we think that from a governmental perspective, we have to focus on the criteria that are really something produced by government, which is needed by government and which is at the moment at least not some kind of private governmental initiatives. This does not mean that we are initiating a lot of discussions with sectors especially when we are dealing with new criteria documents. For example, the financial document that we have produced a few months ago, we are really trying to see what are the important stakeholders, then we are developing a questionnaire that they can fill in, then later on we are analyzing their answers and putting all the information into the criteria document. So, the positive point of it is that we can work quite quickly. We are trying to attract the best available techniques. A disadvantage is that there is not a lot of official approval of the documents that we are publishing. So it is not very, how should I say, straightforward approved, hierarchical process in which there is at a certain moment, the federal government that is saying, these are the criteria that have been developed, did, that have been approved by the government or the parliament. So, it is more about suggestions that we want to give to procurers. Look there, and this is what we think is the latest development in this field, especially for big contracts that they have to do it themselves. Also, have to do some market research. What we do here is to do this work for them, to help them already step further into their research, in the needs analysis, in hope, that then they can also make choices on sustainability.

GM: You already mentioned about the criteria, the categories. How about the evaluation? How will they evaluate the environmental criteria, the actual technical specifications versus what is submitted to them by the suppliers?

JV: So, this is a question that we started a few years ago. This was really a national group, the federal level and the regions came together to deal with this question. The outcomes that we had, I do not know, it was about maybe 15 meetings. We checked what kind of systems were there in other member states, especially the French, for example. We had some meetings with French experts but also what happened in Scandinavian countries, at that moment, in Norway. But our framework was especially based on the analysis of the documents that have been published on e-procurement. So we have a national journal on the very old Belgium tenders that are published from a certain amount on. In fact, all the information was there. The other difficulty is how are you going to check in all those tender documents because this is really a lot, that there is something in it about green or social public procurement. So, the step that we made at that time was, we will try to have some agreements on indicators on sustainable public procurement. So, again on the three pillars, we will put these indicators into the e-procurement system and then we hope that procurers will fill in the indicators and this can be done by tick boxes or from time to time they can also put some other information. But the difficulty that we faced and for which we discussed a long time was from the one side, what is important is that we have valuable information from which we can do analysis and get quantitative, so, in numbers, information that can be

communicated. From the other side, we know that procurers have to do other work than just filling in all those indicators and they have to fill in other indicators into the published documents. And we know that if we provide them with, for example, two pages of information, that they will not fill it in or they will fill it in always very quickly, and the information will not be very informative for us. So, this was a very difficult balance. The result was a simple system combined with a more complex system that can be filled in voluntarily by the procurers. So, the most simple system is about three tick boxes in which it has been set. I do not know the exact phrasing but it is something that you integrate something about the environment into your procurement, then about social, then about innovation. And then if they said yes, we have integrated something into our document, they got into a deeper level. But again, it was not necessary to fill it in. So, they can step to another level and what we tried is to see if this is working or not. We have now some data from 2018 on. In the beginning, search was complete self-assist information, not mandatory. What we see now is that the services that are responsible for the analysis, so, we are also integrated into it, but, are now seeing that we are going to about 2% of procurers that are filling in the boxes. This is not a lot, but from the other side, there are a lot of policy questions that are coming now. For we see that maybe a lot of product groups are not interesting for sustainable public procurement. For example, what you do with legal counsel, consultancy issues, that these are things that we have a lot in Belgium from time to time. So is this really something important for sustainable public procurements? And if this is not the case, it seems logical that procurers are not filling in those tick boxes. So, this is going now on to new questions. Should we not, first of all, reinterpret the mandatory question for what kind of product groups should it be interesting to make sustainable public procurement mandatory? First of all, this is on the criteria level and that's the end of the process for what kind of product groups maybe we should apply for our procurers to fill in the tick boxes, to give monitoring information to us that we can follow up. Then I think the difficult question that we have discussed from the beginning, is it interesting to say for example, 50% of the procurement is green or social or something like that. Then I think that we are making some small steps into the discussion of objectives. And then maybe we can say for food, for example, we can say that based on self-assessment, 50% of procurement is sustainable for example. But this would entail that you have to divide the very broad question on the overall of all product groups now to more specific product groups. And I think for this, it could be interesting to have also a governmental framework or law or in our case, a circular, that is saying that, for all product groups, procurers, you have to see what are the best possibilities to integrate sustainability into your procurement. For those, for example, 10 product groups, we say that this, we as a government say that is mandatory to take into account the criteria. And then of course, there is a discussion where you provide a specific set of criteria, or where you say look at, for example, the guy for sustainable procurement to find what is the best possible products or services, that can be an inspiration for your procurement. That is possible of course, that the procurers are communicating and reporting, then you are already involved in quite a complex system of policymaking, that has monitoring in it and then you have to adapt the policy system and so on.

GM: How do you deal with the changes in criteria and techniques?

JV: Yeah. That that's also one of the problems that we face. It is possible to say that these five criteria for example, for paper are mandatory in all the procurements, but if some new techniques are coming to the market and this happens continuously, it is very difficult for all the innovations that are coming out. As a government it is very difficult to adapt always the commands, because in the initial phase 10 years ago, we saw that this, especially from the Netherlands who work quite fast at the moment that for them, it took already two three years to adapt their documents and to go to all the processes. So, this means that the market is much more quicker and that's why we say go look at the best techniques. We just give you some entry points but please go look in yourself at what is the best solution.

GM: How did the transition towards GPP or SPP go? What are the drivers, do you think? What were the mechanisms done?

JV: There are a lot of mechanisms from time to time and policy documents. You'll see them coming on for the last twenty years almost. But the drivers are of course, support from within the administration, it's also political support. We see that there is some interest from our minister, for example. But the GPP issue is not a big issue that we have put all our money in it. So, they are accepting it, they think from time to time also that is important because there's a lot coming from Europe, from policy documents. So, they see that they cannot put it away. But from the other side, it is I think, also not the most important policy domain compared with other policy domains. This means that the importance that has been given by the ministers and from that on the means so the people that they give for developing criteria and documents from one side and the money for consultancy on the other side, is not measurable. I think that it is also not a big project as for example, the Netherlands. Ten years ago, they put really millions into those kind of criteria development processes. This is something that we never have done. I think for this year, it is about 50,000 euros and a few full time equivalents, professional people that are working on it, but it's certainly not on the whole, let's say a hundred policy people that are working in this domain. I think in Belgium, for the regions and for the federal government, let's say between five and ten policy people that are working regularly on the issue. And then of course, you have all the procurers and the environmental officers that are doing the real operational work. So this means putting the criteria into the documents, which is much more difficult to count how much people are working. But what I see also now from the point of view of drivers is that the priorities that have been put on the global policy domains, laws on budgetary savings, this has had a lot of implication also in the field of sustainable public procurement. Because still for a lot of procurers, the sustainability issue is something which comes next to the normal procurement process. They have to invest more time in its demand. They just have to go to the markets, filling their tender documents and publish it. So they have to do a lot of extra stuff. And if Belgium is the case, actually, there's not a lot of investment into public officers at the moment. They have other priorities, we see that a lot of procurers are under much stress, and so, they are focusing really on to what is important for them. This means procuring, and all the others things that connects to it are superfluous, and this is why they put it aside from time to time and this certainly had some implications also for our policy domain. Apart from that, we see also that there is still the paradigm that SPP costs more. If procurers are really convinced of that, then you are immediately out. We do not defend that position because if you are doing innovative procurements, you can even do a lot of savings. We heard last years of very good examples but from time to time you're dealing with operational people that just have to do their procurement into their category fields. So they are just putting the procurement that I have done two years ago back on their desk and see what kind of adaptations do we have to do and not much of all those innovative and reflective stuff. This is difficult, not for us. And so from time to time, it is our task to say to the people, maybe you have to invest. Yeah, encourage them to say that it makes sense to have a bit time to see how you can make the procurement more innovative, more adaptive to the market possibilities.

GM: But generally, were they willing for the transition?

JV: I don't know what is all behind, but sometimes, especially when there are green ministers that are responsible for certain departments, they are sometimes saying to chiefs, you have to deal with green public procurement and you have to do all that is possible, et cetera, et cetera. Then we see that there's something which is going on. From time to time also. the central office of procurements or something like CEOs in the procurement departments, are really convinced themselves and they let their procurers to apply something about SPP. From the other side, I think the last years, they are on a lot of pressure. They are influenced also by management practices in procurement, management trainings, contract management and so on. The SPP issue for about the last five years is really in the operation. But it is very difficult to measure and it depends really from one service to another. So even in Belgium you can have if you're asked a certain department, do you do something with SPP, some can even say, especially the new people, what is that SPP? I don't know, I'm a procurer, but SPP or GPP, I'm not really involved in it. And then you can have other departments that are saying yes, we are doing a lot and the work that you're doing is very

interesting and we are trying to integrate it. And so it seems that there is not something really a common line. So it seems that it is more about really something voluntary that is picked up really by some services but for other departments it is something which is not important. This is also very surprising because last weeks we have a lot of discussions on the years we have grown our measures in our department and what is very surprising is that we are dealing already 20 years with this GPP issue. We see that something is picked up but it is certainly not something which is done by one hammer decision and it is followed by all the other departments in Belgium. This is not the case. From the other side, if you see that the decisions made on the Corona are so done quickly, so fast. They have so much impact, surprising.

GM: For the supplier side, do you need to encourage them also? Are there also actions done for them?

JV: Yeah. So for the criteria processes, the first version in 2000, we had I think about 10 or 15 product groups. What we did at that time was we presented them to businesses sector, the criteria that were developed by the European Commission. Then we said, what do you think about it? What has to be adopted on a Belgian level, and how should we make some interpretation for the Belgian context? At that time, we had a lot of cooperation with stakeholders, the businesses, the NGOs were also present at that moment. So, for the moment, because it was quite resource intensive, we do this by questionnaires. Some especially innovative businesses are responding actively on it. But, it depends from product group to product group, of course. But yeah, a lot of them are saying what is this? Is this something new from the government, and so on. I think this is also a bit that has been changed for the last years. Apart from the circularity issue, this is picked up fairly very well in our country, but from other things, yes, we receive important information that for a lot of companies, this is not already something which has gone through to all the companies. But again from time to time we have some questions of companies that are saying, we have developed a label, can you put it on the website? Of course, we say yes, we will check first if your label is in conformity with the law. If it is approved, we'll put it on the websites. So, since this is really indicating that some businesses are dealing with it, innovation pilot projects, for example, in the field of circularity, this is really working well, but in which we are less developed, evolved in it.

GM: So are you saying that the market is ready?

JV: It's an important question. I think what we do is to make the market ready. So the question is an old question, is the market ready, and it was of some importance a few years ago. But now we see if you do stakeholder consultations, if you inform the market, probably they are thinking and they are seeing, oh, watch out because in a few months or in a few years, there will be tenders which integrate this kind of criteria or this kind of clauses so we have to be prepared for them. I think procurers now also know better what they can ask for and what they can't ask for. They would not like to be in a situation in which they don't receive any offers and they have to do all procurement process again. So, they also are bit cautious and they are not always taking up the criteria that we are proposing. But from time to time we see that labels, for example, for sustainable wood, we have very clear information, that this is something which is really well initialized by GPP. We had, in again 2008, 2009 important discussions with the wood sector and with the labels, the FSC and the PEFC labels. And now about 10 years later, we see that it is almost common practice that these kinds of labels are coming into the tender documents. For this we have also a part in monitoring in which we see that FSC and PEFC is coming on in a lot of tenders. This is working very well. Also for I think, ecological products in the cleaning business is very well accepted. A few years ago also in the printing services, we were present at meetings for business people in a big conference hall in which we were not there as presenters, but we heard from the sector that they recommended their members to work on the ISO 14001 label because there are a lot of governmental departments that are asking for that label. So you see here that the sector representatives are informing their members on what we were doing. Also in office

supplies, there's a separate sector from the normal sector, let's say. They are trying to inform on product labels and on business labels like the ISO 14001, for example, to give information. So, a bit of the information that we give and the information that can be useful for the market players. But, again, I think this is more of a question we have that we, as governments have to make the market prepared for what we are doing. But it depends also on the marketplace itself. Some probably, they are answering tenders in which there is not a lot of criteria so, they will not invest a lot on their sustainability issues. But others are even contacting us and saying what are the things that you are working on at the moment because we want to be prepared at the time that maybe new tenders for sustainability will be there.

GM: Do you have programs for the suppliers?

JV: What we are doing now is, if there are new documents, our consultants will make up questionnaires and these will be sent out to the market. For the suppliers, what we have done a few years ago is we wanted to see if we can get information on the long chains of textile, ICT, for example, to see how we can deal with these difficult working conditions in China and all those other countries, if we can influence them. This was a very difficult issue. So, we were faced with consultants and with about, I think it was five departments and 15 specific procurements. We tried to see if we could have information, this information was especially given or possible to give from the tier one suppliers. So the first supplier that is working with the procurer, but of course in this case we are dealing with very complex change. You have to have information also from the tier two supplier, this right that is delivering to the latest supplier and tier three and tier four, et cetera. And what we saw is that for tier two, it is already getting quite difficult and to even go deeper into the chain is almost impossible. So this is very complex to get transparent information for these long chains, this is really a new field. For example, what we think is there are some NGO reports produced by Finnwatch I think on this theme, they have analyzed the fields. They also see how negotiations between suppliers and procurers for big contracts in those sensible fields are possible and how they have also reached to influence the suppliers. This is very interesting stuff. What we are trying to do is to see how eventually in the near future we can work with Electronics Watch or to see how we can get information from the IT chain and to see if we can have some influence on it. This means that a lot of mechanisms exist. Also you can do on site audits in China, for example, to see what are the working conditions. You can send the inspectors to the production chains, or you can have management questionnaires. They have to be filled in by the management to see if they know their own supply chain and how they can influence, for example. But for the moment, I think it is difficult to say yes, this is a very good example of influence that we can have. Apart from this, this is really resource intensive. In Sweden, we had a lot of contacts with the Swedish colleagues and they are really putting some professional people that are informed in the social issues in the long chain and they have also the capacity to understand what are the best social mechanisms and to negotiate also with the suppliers if you are informed that some long warranties are there to make differences possible. There's a lot of conditions on it. So, it has to be for long term contracts or contracts with a lot of spend for example, you have to have good relations with suppliers, with senior management, that is itself very well aware on what is happening into the fabrics and the distribution and the chain and so on and so on. And finally, of course, they have to have the power to influence what is happening on the ground.

GM: What do you think are the other barriers aside from those you already mentioned?

JV: Monitoring is a barrier because then we need the support from the procurers themselves. I think the procurers have to know, is this really something useful that we are doing? Or are we just again ticking in some kind of boxes and we don't care really what is happening. So, I think from that point of view, what is really needed is to make really clear in this kind of field, for this kind of categories, SPP or GPP is important and you have to take care of it. For the other categories, which will maybe, I don't know 60, 70, 80%, you do not have to take care of GPP because we think this will not have a lot of influence on the environment or the social issues. But first of all,

let's concentrate on the low hanging fruits or on the issues that can make a big impact on the environment or the social issues. From the other side, from the procurers themselves, for the federal level at least, they were supported by people that we're dealing with, let's say, operational sustainability issues a few years ago. So, this is important to see how this procurement has been done in the organization itself. Sometimes you have small organizations with one procurer that has to take care for all the procurement and all the logistics and all the building issues, et cetera, et cetera. So if these people have to take care besides that, for me, it's a bit greener, social issues, it is getting quite hard. But from time to time, there are people that are taking care of the sustainability issue. So if these two people can work together, if the sustainability officer, let's say, can give information to the procurer, mostly this works and it is mostly picked up by the procurer and then the criteria and the clauses are put into the documents. But if this other person is not helping the procurer, mostly the procurer has other priorities and he's not dealing with it. So, this is in case when there is one person or two persons. But for bigger organizations, of course, the defense administration is where they really have to be helped by another division that is informing them on the sustainability issues on a strategic level. So not all only for specific procurements, but it has to be saying, okay, we see that you are procuring the next two years, listen, this product we want you to integrate those kinds of criteria into the documents. But to make my point now is that we see that the last years, these, let's say secondary people is helping people, this advisory people on the level of sustainability have other priorities into their departments. This is eroding a bit the policy itself from an operational field and this is why we have stressed this also. Are we going to stress it to the new ministry, because we should have new minister in the coming months, that if you want to make this kind of policy to get up picked seriously, you have to provide those advisory people the resources. So, the barrier is in fact that the internal support has to be guaranteed and besides that, also, of course, the political will mostly transformed into resources for people, to help the procurers to do something about it.

GM: You mentioned about some procurers being cautious. So have there been cases where there have been lawsuits because of procurements done?

JV: There was in, I think 2008, a lot of discussion on the buying of coffee. We had a lot of discussions at that time also with our Dutch colleagues. I think it was the fair trade coffee, how it could be integrated legally into the documents and it was later on that a decision by a Dutch court has been made and from that time on, we saw that there was less difficulty to integrate fair trade into the tender documents. Another problem that we see to be a bit specific, for example, is that the collection of textile is organized by the local communities and what they are doing, if I remember quite well, is they are putting into their tendered documents that this textile has to be in conformity with some kind of sustainability issues. Like, for example, that it has to be collected for people that do not have the possibility to have quick access to textile or this has to be collected in the context of development of people in Africa and so on and so on. There was I think even a legal tension between companies that said, you cannot do that because we are collecting textiles just because of profit reasons. So, all the extra criteria on social and green and et cetera we do not accept that you are integrating in because this textile collection sector was divided into companies that are just doing the collection because of business and they would make money of it. But later on, what was done with textile was not very clear. From the other side, collection that was initiated from more an NGO field but within the context, we have to do something with the textile, something sustainable with it. This was really a confrontation, in my opinion is still going on. And they have said we will go to court with it. And they have gone to court I think to discuss some articles of the procurement law to see if it is possible or not. This was quite serious combat between those two sub subsets. Yeah, this creates, of course, an environment for procurers, oh, we have to take care because if they put us to court, because we have put something wrong into the tenders, they do not want to do it. But I think the last years it has been changed. Except for the example that I give now, I think a lot are more confident with the policy domain that they can at least put something into their documents. Maybe it is quite soft, but the discussion as we had a long time ago, oh no, no, it is legally impossible and we do not want to take the risk to take up green issues into the documents. What is interesting also is that from the legal point of view, I

think that the discussion is dealt, that procurers know and they have no problem anymore with taking up green issues especially technical specifications or sometimes also a lot of criteria. This is something normal. Green criterion is mostly also technical specification, as there are other technical specifications. And procurers of course, know that they can take into account the technical specifications because it is provided by the law. It was a few years ago, it was green and everybody had an idea of what is green and some found it ideological and they said, no, we don't like green, so we don't take it up into the documents. But now it has become more clear, this green paper means paper in which the fibers are coming from et cetera, et cetera. So it is really industrial, technical, to see, for a lot of procurers boring because it is the technical people that are dealing with it. From the legal point of view, this is not really a problem. This is something else with social issues maybe from time to time, but I think the debate is not as fundamental as a few years ago. I think that they accepted we can do it. But the question is only how should we do it in the legally correct way?

GM: Aside from the barriers on legal frameworks, political policies, do you think the procurers themselves, also have certain personal barriers?

JV: Yeah, I think a lot depends on their context, if they have the time, if they don't have been supported by people next to them, it is getting difficult. And then they are really facing important barriers. We have also a few years ago, discussions with these procurers to see a bit what is their everyday context in which they're working and they see themselves from time to time also as coordinating figures. So they have to become mostly legal, especially for the big departments, legal persons, that are aware of what is in law, that from the contents of the procurements on the specific technical criteria for example. They look at other people and they have to inform them on the content that they will put into the document so that they see themselves not a specialist on these issues. And yeah, this is something wrong I think that we made from the beginning, a procurer is coordinating a lot of stuff for which the result is finally the tender document, but he can't be a specialist in all those domains. Also procurers that have to buy service for buildings, at the same time, the food, the food delivery, the papers, the copiers and all those stuff. They're just looking from time to time in the catalog. So, we have done some study fewer years ago because we thought it was important to understand how these procurers are working into their everyday context to see also what is the influence on sustainability for it and where we can have influence and if you don't understand it, you can do years and years of work on mandatory and voluntary, and criteria monitoring, et cetera, et cetera. But in reality, nothing changes, nothing is happening. I think, at least, I defended always in our ministry that we have to do something which has really some kind of influence on the ground, and that we are not working in the kind of bubble in which we think maybe that we are doing good work. But for the rest, everyone is saying it's not really important, they can't attack us, et cetera, et cetera.

GM: But you think these barriers have been addressed as they come?

JV: I doubt. Personally, I think the priorities last years were not on the sustainability issues, but more on professionalization of procurements and on dealing with the spend of procurements. So, centralization of procurements, putting a lot of contracts that have been done by different procurement departments together to create more spend. Sometimes a discussion on sustainability is integrated into it. But often the stress is quite high and they don't have time for it. If centralization is good or bad for sustainability is another discussion, I think. Big companies from time to time are better armed to deal with these subjects compared to SMEs. But from the other side, we see also that some innovative solutions come from SMEs also. If you are working with more and more big contracts from the sustainability issue, you can also ask the question if, at the end, you are working as a whole Belgian government with only two or three suppliers and certain domains, for example, especially for office products, as is already the case, is this some kind of developments that we want to continue or do we also want to focus on a broad market with the SMEs that have opportunities also to play into the procurement game? And last year, we see that it is more and more on central procurement services.

GM: You mentioned that one of the barriers is monitoring. At this point, can you state some benefits of the SPP that you've seen so far? What have been its impact?

JV: We have two monitoring systems. The first I mentioned to you already, so this is the check of e-procurement from 2018 on. But before we had the discussions of this kind of monitoring, we would have also some information on how sustainability is integrated into past procurement. And this was a study that we did with the university which checked I think in the first published document from 2012 to 2017, I do not remember really the exact dates. But there were about 144,000 tenders that have been checked by informatics algorithms to see if there are some codes, some typical sustainable concepts that the procurer can come back into and to give information back on it. So, again, a lot of information on the methodology, I should inform you, but the results of this study are more important to you, I think. What we see is that there is quite a lot of reference to more broader concepts like, for example, sustainability, environment, social, are often coming back to the tenders. But the question then is, is this specific enough to say this is really an interesting sustainable tender. And we also want to see if more specific information was in it there and then we thought that if there is some reference to a specific ISO standard, that maybe can refer to some kind of sustainability issues but more important were the labels. If there was reference to specific labels, then we think that really something is integrated. And this study shows that maybe not for all tenders, but there was at least a certain acceptable percentage of tenders that referred to the labels. And we saw also that there was a development between I think, 2010 and 2014, which was really that it was uptake of these kind of clusters into the tenders. But from 2014 onto, I think two years later, there was something which was going down, so this is not always a good sign. But it gave at least for the year 2014 a good information that we were working on something which has real impact on the grounds.

GM: What do you recommend for faster adoption of GPP at all levels, but maybe more specifically at the federal level?

JV: At federal level, I think at this moment what we need is a minister that is saying I think that SPP or GPP is important and you, administration has to continue on what you are doing and you have to invest more on it and she will have to convince my boss. Then we can see on what we can do to develop more in cooperation of course with the minister that will set priorities on it. This is first thing for our department but I think even more important is to put SPP back on the list in all the different departments that are doing the procurement and to stress again, that it is not only about public savings, but also to take account of the system and issues next to the public savings. And as long as this message is not been given, I think we will go more into an analysis of numbers of have they saved something in this contract, have we less procurers now that have to be paid by the state, are the teams going smaller because we have to pay for the teams and the officials are doing not enough, and so all those kind of debates. So they are putting a bit more the club backwards at this moment. And I think really investment into capacity into the administrations for sustainability issues is really important at the moment to continue into this field.

GM: What do you think is the future direction of SPP in your country?

JV: It is happening, something in silence, but I think it is picked up from time to time, it slows down as we see, I think the last years and then we do not really know if it is for the federal department at least a big issue anymore but, I think that it is something which will stay in a lot of policy documents, on production and consumption processes that are coming from European Commission. For example, you see that circular procurement is very important, but also the field of GPP and this special procurement is even more mentioned from time to time than in previous years. So I think that it will not go away very easily. But from time to time also it depends on people that have been working on it a few years on it and if these people will go away, the question is, of course, will they be replaced or not?

GM: In your opinion, do you think it should be mandatory?

JV: This is always the most difficult question for me. To make it simple, I think that the question on mandatory should be in line with what are the product groups that are priority for the environment, for the social issues or even for the circular procurement. First, can we detect on one or another measure or one or another serious methodology, these are the most important categories. Then we have to say, by a kind of legal documents to the procurers, these are the categories that are important for us and so important means that these are mandatory, for example, for the federal government. And then the next question is of course, mandatory for these product groups means that you have to take into account these criteria set or these clauses, this is the statistical solution, because this will mean that that we will start the coming at least two, three years with fixed set that cannot easily be adapted. Or second solution is that you say that you will do everything to take into account for these mandatory categories, green or social issues, but you are free on it. So this is something that you have to do yourself based on the information that you can find, for example, on the website that we have produced. But then they have to explain themselves what solutions that they have proposed, of course, for the mandatory product groups, but then they are a bit free to decide how to put all into the tender. So, this is, let's call it the flexible, mandatory issue. But I think if you understand mandatory in this point of view, I think it has some future. If you say rather the vague question, GPP has to be a mandatory point, I understand the phrase, but I do not understand how you go into implement it in practice. And again, for me if you talk with international colleagues, it is not always but this sometimes stated this way, do it, has to be mandatory or not. And it has to be more specific and more elaborate to really explain what this mandatory issue means in a practical situation and otherwise, at least it does not make much sense.

GM: You mentioned that you are using the GPP toolkits from the European commission together with other sources. Do you think it's very helpful and do you have any more recommendations on their program about GPP?

JV: Yeah. I think it is very welcome for us. It is because if the European Commission is doing something in this field, and it is very, very welcome for us because this means that we can refer to this work and do not have to develop something ourselves. We had a lot of discussions last years. Do the European Commission have to stress on very specific criteria, for example, this is the light version, the technical specifications and then the set of criteria and this is the more complimentary version I think that equals that. And then the criteria or do they have to refer more to broader information to help the procurers to integrate something green into their documents. In my opinion, they have evolved to something in between. So 10 years ago for example, we should ask for papers and technical specification of paper products, has now evolved to new solutions in the business sector themselves and in this case they can refer what do you can mention for example, specific paper services, for example, not just buying paper and then you put it away but maybe you have some companies that can, at the same time deliver paper and they are putting it back and something like that. Or for example, street lighting is very interesting. It's not just delivering the lights that can be placed by another company on the streets, but is more on integrated concepts of seeing where can we put the lights, how can we deal also with CO₂ emissions, is very important getting in and this is kind of a complete sets which is in the new GPP documents very interesting I find and I hope they will continue in this way. And from our point of view, certainly we will refer to the work that they are doing.

G Interviewee CZ Transcript

Interviewee : Daniel Hájek
 Organization : Ministry of the Environment
 Position : Deputy Director, Department of Financial and Voluntary Instruments
 Country : Czech Republic
 Date & time : April 23, 2020, 10:00AM
 Duration : 95 mins
 Channel used : Skype
 Interviewer : Graciela Mante

GM: Can you please tell me about your organization and your role in it?

DH: I work for the Ministry of the Environment. We are responsible for all environmental issues which are somehow dealing or have an influence on the environment. I'm working under the Department of Financial and Voluntary Instruments, so partly we are responsible for funds or some subsidies and for voluntary tools under which GPP belongs. I'm responsible for GPP, ecolabels and EMAS and other issues. I think this year will be my 15 years. It's quite some time ago. So yeah, let's say I have some experience.

GM: Are you implementing GPP or SPP?

DH: We call it different ways in different times. Sometimes it's smart, sometimes it's sustainable, sometimes it's green, sometimes, it's whatever. Let's say that now we mostly use sustainable content because we closely cooperate with the Ministry of Social Affairs. They work on social issues and social criteria and the requirements. We try to present these type of public procurement together so now mostly we use for sustainable.

GM: When did the initiative start and what triggered it? Was it because you need to comply to the EU Directive or was it a national initiative?

DH: We worked mostly on ecolabel and green public procurement. So, when we established a national system of ecolabel or ecolabelling in 1993, already at that time, the Ministry of Environment tried to support companies which went for ecolabel or by preference of a product during procurement. So it was let's say half of nineties.

GM: You started early.

DH: Yeah. In 2000, we as a ministry proposed a government resolution and it was approved. So, somehow it was at least established on a ministerial level. It was approved on a governmental level. But quite an important point is that a government resolution is not part of legislation in the Czech Republic. It's like, somebody calls it as a gentlemen's agreement of the ministers. It's binding for the ministers, not the ministries.

GM: So just for the head of offices.

DH: Yeah. Of course, they are not responsible, but they are responsible towards government. So, quite usually there is a point that the minister or the ministry gives the report about how the government resolution is followed or implemented in the ministries and in organizations which are established. And of course, it depends how important the issue is. So, if the issue is quite important for the ministers, they need to know well during the meeting of the government and tried to follow as much as it's possible. GPP is not kind of this type of issue. So if the minister and people in the ministries are, let's say, personally environmentally friendly, they follow or they

somehow think about the environment. So they follow the government resolution and somehow try to buy ecolabel products. At the time, every year, maybe as I said, it's been quite common, we send reports to the government. Before that, we send out the questionnaires to the other ministries, and try to collect information and they send us some numbers, which product they bought and the ratio of green products from the overall amount of product. It is kind of basic information. It wasn't just the ministries, it was also a Czech National Bank. In fact, the colleagues from Czech National Bank were quite active. But we decided in 2007 or 2008 that it's not enough, because the numbers were quite the same for many years. There wasn't any progress. So we decided that we will introduce the new government resolution, which will be, let's say, mandatory because it was from the government resolution from 2000 just to recommend to ministers to buy these products.

GM: So in 2007, it's already a legislation?

DH: No, in 2008 it was not valid anymore. It was not a legislation; it was again a government resolution. But the government resolution didn't recommend much. Say, in every case, you buy and it was approved for two categories, IT office equipment and furniture. Every minister, every organization under the ministry, have to comply to buy IT equipment or furniture.

GM: So it's mandatory for these two categories?

DH: Yeah. Not surprisingly, nothing really happened because a government resolution is not a piece of legislation. And because the Ministry of the Environment is not really the strongest ministry in the Czech Republic, and the GPP issue is not the most important issue even for the Ministry of the Environment. So the numbers rose a bit, but it wasn't certainly 100%. Of course, we have some release, for example, for Ministry of Foreign Affairs, if they bought some furniture for embassies, it wouldn't be environmentally friendly to take it from Prague or take it from Czech Republic or send it to Australia. Of course, at the Ministry of Defense and Ministry of Internal Affairs, if they need some special ID equipment for special security conditions, even this equipment was taken out. But even that numbers weren't so high as we expected or we wished at that time. The second important point was that the government changed and it was really environmental unfriendly. So GPP was an effort. At the time he didn't do anything to support, to promote, to cooperate. And it took, two or three years and the ministry was in fact destroyed personally. Many people had to leave. Another important point happened and it was that the public procurement act really changed because there was a history about price and there was an amendment of the law. From that point, it was 2010, the only evaluation criteria was the price. You could ask for some environmental criteria, somehow unimpacted, really slightly. You will be really brave at that time if you ask for environmental criteria under technical requirements, but certainly not under evaluation criteria. But, yeah, after some years, when the government changed again, we thought that it's the right time at that time to try to somehow reconstruct GPP in the Czech Republic. We came back for the recommendation because at least it's not so much an administrative burden for the Minister of Environment, because under the previous system, we would have to negotiate every criteria with all other ministries and then it would be necessary that the criteria will be approved by the government. It would be difficult and we don't have enough personnel sources. So, let's say, that ministry for example, should buy sustainable products or behave sustainably during procurement, if they want to, they can follow or use toolkits which are published by the Ministry of the Environment. So, then we published some eight or 10 product groups or toolkits. But also the same with the Ministry of Social Affairs, procurers can use social criteria or environmental requirement, depends on what the tender is close to.

GM: So this is the current system used and still no legislation at this point?

DH: It's still valid, the system, yeah. It's not in legislation. The only thing which is in legislation I think is emission of cars because it's in a European directive, so it's even in our Czech national legislation. On the other hand, the legislation changed because the new European directive had

been approved. So, consequently, the Czech Republic also had to react and approve a new national law and under this new law. It's possible, in fact, in quite many ways, you can incorporate green or environmental requirements or criteria. There is quite a lot of phase. In fact, it is not so easy in reality than it seems. Still, it's quite difficult to evaluate. It's quite easy to put environmental requirements in a tender, but it's quite difficult, especially for procurers, to evaluate if criteria can be met. The biggest barrier is that they are still afraid to ask any extra, not just environmental requirements, but even quality requirements because they are still afraid that the office which is responsible for controlling the free market procedures, that they will fine them because they ask for other criteria and not just for price. So, that's the biggest barrier. It's changing slightly. And the second is, as I said, it's really difficult for them to say if they know that there are toolkits or if the stuff is not in any toolkit. The toolkit doesn't cover all product group or stuff. And if they ask for some environmental requirements, they are afraid that they will not be able to evaluate or if it will be difficult for them to do it. It depends on their view what is made for faster progress in GPP.

GM: Do you have a National Action Plan for GPP?

DH: We decided not to approve. If the ministries or other organizations don't follow in fact instructions from the government resolution, why have an action plan and what would be in the action plan? It would be almost the same or maybe there will be, okay, the Minister of the environment will be introducing two new product groups every year but because last year, we have to decrease number of staff in the ministry, I'm the only one in the ministry and I don't really have any time. We need to revise the current criteria and I am not able to do it. So, what would I do if there will be action plan and the action plan would say, okay, the Ministry of the Environment would be introducing two product groups every year. There is an inter-ministerial working group, so they are procurers from all ministries and also from some other organizations which are, let's say, have a role in public procurement and we discuss ways how to promote, how to deal with GPP, how to promote SPP. The Ministry of Social Affairs, because they were able to get some money from European funds has a team of 15 people, so they can do some things. So, they organized some conferences, workshops, seminars and promotional activities. They always think about us. So they give space for the Ministry of Environment so we can also somehow benefit from their activities. For Ministry of Environment it is me and some other guys who are responsible for GPP or SPP. So I cooperate with colleagues from Ministry of Regional Development, which is responsible for the Public Procurement Act. They are the main authority for public procurement, and they have an academy of public investments or something like that. They also organize some workshops for us, two seminars or two workshops a year so I can present our toolkits and some theory about GPP. So, let's say that every year about 20, 25 procurers are joining during these workshops and I can at least slowly present and spread the information. Few towns are quite active and few use sustainable criteria, like five or I don't know. There are not so much examples, good examples which will be a positive courier. The best way how to persuade procurers is to give them examples. There is something for them to be based and at least they are less scared when they know that there was another contract or another tender of these criteria, and be inspired and they can use it because the previous procurer haven't had any problem.

GM: So, what's the current status of GPP adoption in your country? You mentioned about a few municipalities. What's the percentage for the entire country?

DH: Unfortunately, we don't know numbers from municipalities. It's impossible to get in touch with all municipalities and if they don't actively send us an example, we are not able to get to know about it.

GM: I know there are barriers, but were you able to set a certain target?

DH: It's not only about barriers. It's also because the ministry doesn't plan any tender where you can use sustainable criteria for some years. We, as a ministry, make, I don't know, one or two

tenders a year and if you didn't procure any stuff where you can somehow use sustainable criteria, for example, if you ask just for services, it's quite difficult and like legal service, but you can ask. They can have whatever you ask for, they will somehow search it in the maximum, maybe there will be some social criteria. That's why we have a problem to sign a memorandum now. Even there is a task for a member of the memorandum to publish one tender in this year or next year and we know at the ministry that we don't have any tender in a tube, let's say, in a tunnel. So again, you set some targets but if you know at that time that you can't reach it, or it will be just a target for target. Maybe I work too long at the ministry.

GM: You are just stating your observation of the reality.

DH: Yeah, we have to reflect reality. We don't have enough money, enough personnel services. If I'm there alone, if I would have a million euros a year I can do some stuff or some things, to organize without any action plan. We will try to organize, create some publications about GPP and we will go in regions then try to organize some workshops in the regions, because, of course, not everybody can have a time to go to Prague. Also, when you go there, you somehow show your interest and avail to help them because you go to their place and not invite them somewhere. So, another important thing which can help is that now European Commission is quite tough when negotiating about new program period, European fund period. They are quite pushy about GPP and using of European Commission toolkits for GPP. So they ask not only the Ministry of the Environment but also other ministries which will provide sources of financing for European funds, how they will implement green criteria or promote criteria in their programs.

GM: So you're using the toolkits from the EU?

DH: No, they are not useful. The problem is that they create them for a long time. So, after some time, some links to pieces of legislation are not right anymore, or standards are not valid, or levels have changed. You have to revise toolkits at least every six months, or just even check them if it's okay. If you don't do it, they are old. And the second problem is, now we try to create some other toolkits for European funds, an international one, based on European. So, this year I was able to get some money and my former colleague from agency now make an analysis of six European toolkits, we try to revise them or let's say, check and replace links on legislation and standards. And of course, look at the practical side of the world. For example, criteria that are usable for conditions of Czech Republic. An example, there is a European toolkit for transport and there are some requirements for buses and technology of engine and they ask for hybrid and just Volvo produced them in a very limited condition or amount. So, if any organization would be so great and say, look, there is a European toolkit, we will go for full hybrid because European Commission guarantees that they are usable in all countries at this time and will ask for hybrid. They will have to probably cancel the tender because there will be no producer. If the office which controls the free market will say, no, there is only one producer, you can't ask for technology which is provided by just one producer. They are quite easy to use until the moment of evaluation. Even if the requirements are okay, standards are still valid, or piece of legislation are still valid, it's really difficult to evaluate. It's difficult for the bidder if the bidder doesn't have an ecolabel or management system. The procurer still has to make possible that the bidder can prove it by alternative way. If you ask for ecolabel but you don't have ecolabel, usually they send you this kind of column of paper and say this type of paper proves that it fulfills the criteria. Of course, a tender is money. Usually, the bidder will promise, will claim that he's in line with criteria or requirements, and it's not always true. It's difficult for the procurer to evaluate, because if you have hundreds of pieces of papers, with millions of numbers, we are not experts. That's why I think that the European toolkits are not workable at least not as European Commission claim or even think.

GM: For the GPP ecosystem, you already mentioned that you have this inter-ministerial working group?

DH: The members are from ministries and some offices, for example there is a member from the office which controls the free market.

GM: Is there also a group for procurers? Is there a representative for local government?

DH: All ministries and governmental offices. We have more than one council or union of municipalities, but at least two of them are members.

GM: Do you also involve the private sector, the suppliers?

DH: Not really in this particular group, but we try to discuss with them the criteria. Two years or three years ago, we were drafting criteria or toolkits, we were in touch especially in some cases with the private sector. We try to set criteria or requirements in such a level that we'll be able to deal with. For example, in the construction sector, private sector is miles away. They are ready because mainly they are multinational or international companies and they have to deal with much more strict requirements in other parts of Europe. So, when we had a meeting, I was like an observer of one working group of Czech Green Building Council or something like that, when we discussed GPP or when we discuss environmental requirements, as I said they are far ahead. Actually the private sector wouldn't have any problem, even if all organizations would use our toolkits especially if there would be a clear message. Another thing which can really help is that public procurers or the government as a whole, will say, look, we will use environmental criteria in certain term, in certain date. For example, this year or in this moment, if the government will say, look, from the beginning of 2021, we will use environmental requirement. Most of companies will get ready in time. Another problem is that usually tenders are done in the very last moment. You know, ah, we could be running out of toilet paper, then you have the last roll. This is my favorite example. In that moment, it's quite difficult to set environmental requirements, then you of course, somehow limit the number of bidders.

GM: So, are you saying there is lack of planning?

DH: Yeah, another. That's why also the Ministry of Social Affairs try to prolong that EU project and focused on planning because this is a quite a problem. Also the Ministry of Finance and Ministry of Regional Development and governmental offices are aware that this is the problem. So, I think that they will also do some activities which will explain to procurers how important planning is. It's very difficult. It's not bad just for green public procurement but for other things.

GM: How do you prioritise the product groups with regards to GPP? You mentioned earlier about IT and furniture.

DH: We use them because we thought that it will be easy in that product groups because we think we are not at a stage we can go for really difficult categories and let's say that we try to teach procurers in easy categories like paper, IT equipment or lighting or food, catering services, whatever, which is quite, easy. We usually send, like, two or three criteria or requirements. More than three requirements is difficult. Maybe we decided that either do one or two requirements, the most important ones. That's another reason why European toolkits are not workable, because usually there are 10, 20 requirements. Nobody would really use them or have the time to deal with 20 criteria or 20 requirements. It would be impossible. We are a competent body for ecolabel. In many times, European toolkits use the criteria for ecolabel. Even for colleagues, which are, let's say experts on this issue, it takes usually more than two or three months to communicate and explain to companies which ask for ecolabel, to apply for ecolabel, what they should send. I can't imagine a procurer who is not expert on this issue trying to explain to a company what he needs, because he wouldn't know what he needs.

GM: You mentioned there's some difficulty with evaluation of environmental criteria. So who is doing the evaluation? Is it just the procurers or is there a certain kind of group who do this?

DH: We offer procurers that, in some cases, we can do like a helpdesk role. They can ask if they don't know, they can contact us earlier. Then in the very last stage, when it's usually too late to repair problems or solve the problems which are based on previous steps, the steps which are finished already, for example, if they wrote criteria or evaluation process in a better way and then publish a tender and close the tender and evaluate offers. In this stage, it's impossible to help them because the first stage is finished already. They can't change criteria or the requirement if it's published and there is a deadline. It is after the deadline, so they have the offers and they realize that there is a problem because they made a mistake in a wording of a criteria. Sometimes it's about one word.

GM: It seems rigorous checking is needed, indeed.

DH: Yeah. We don't have any office which will help everybody. In ministries, it's undoubtedly easy because there is always more people. For small municipalities, especially, there is a disadvantage, it's almost impossible. I know a mayor of a village and there are, I think, three people at the municipality office. I can imagine that they even have to hire somebody to solve the standard tenders. Now, of course, they are somehow aware of the rules. They don't have time to really deal with standard issues and now they will have to solve some extra thing. Next time I can ask and slightly push the village to ask for some environmental requirements.

GM: So, for now, you're evaluating the bidders based on the ecolabels?

DH: It depends. We try to use also ecolabel criteria but one or two of them at least, because few companies have the ecolabel and there is a potential that they will send their offer under these tenders. So at least some of bidders will have the ecolabel. For procurer, it will be easy to evaluate. Because you will see ecolabel certificate and say, okay, because if you have an ecolabel, you are in line with the requirements. That's the easiest way. So that's why we also try to base environmental requirements on criteria, but it's not all of them. For services, it's easier to use EMS, ISO 14001 or EMAS. We try somehow push forward EMAS but it's quite difficult, because again, there's a few companies which use EMAS in the Czech Republic, but many of our companies use ISO 14001. However, we are responsible for EMAS, till this moment, we didn't find any way how to potentially prefer EMAS. ISO 14001 is like out of our power. EMAS is like ecolabel. We are responsible for final evaluation and registration of companies in EMAS register.

GM: Since GPP use is just a recommendation, so it was not really adopted that much at first?

DH: Yes, for the whole time from the very beginning, and I think that we will not be able to change it in another five years.

GM: But at least you're already starting to let them be aware of what GPP is with your workshops.

DH: Yes, that is true.

GM: You mentioned already the mechanisms of adoption that you are implementing, the ones you've been doing with the social ministry, the lectures. Do you also conduct workshops for the suppliers?

DH: No. If they will be interested, why not, they can contact us. But they are more ready than the state service.

GM: What do you think will make the ministries and municipalities adopt GPP more? The drivers?

DH: It is important that the government will clearly declare, will ask for environmental requirements in certain time and will really do it and now after some time more municipalities will follow. We will see if this will be approved. But there will be some extra money for the subject which will be asked from the European funds and we'll use GPP. They will probably get more higher co-financing from the funds. In the same call, if you will have a project, for example, road repair, or operation for some roads and one subject will say, okay we will somehow implement environmental criteria. They could get like a 75%. But those who will go in a standard way, they will get 70% of financing. Of course, money talks. So, we will see if we will be able to go in this way and I think in that point if yes, I think it could really help to somehow raise the awareness about GPP because it's still quite low. If there would be again also a clear signal from the office which controls free market that this approach is fine so procurers will not be scared that they will be fined afterwards because they asked for environmental requirements, it will be okay. I mean it would really help for these two or three things to happen.

GM: About this fine you mentioned, were there previous cases about this that's why they're scared?

DH: I don't know an exact case.

GM: But were there lawsuits filed?

DH: Yeah. I mean not only environmental but also quality requirements or whatever. Sometimes by purpose, sometimes by mistake. There is quite a lot of cases.

GM: How about the culture of the organization, are they open for the green changes?

DH: It is case by case and it depends on people. Generally, if I speak for all citizens of Czech Republic, environmental friendliness is rising slightly. So it's better and better, people think more about what they do, how they do their things. I think it's going better but slowly or slightly. So it's not, you know, huge steps every year. So it will be evolution not revolution.

GM: Earlier, you mentioned some of the barriers already. Are there more you want to add?

DH: The first thing is the procurers are afraid that the price will rise a lot. But mainly that they will be fined because they will use something un-standard or that they ask for something extra and maybe not even know awareness. Everybody is aware about quality, but the procurers don't ask for even quality requirements. They know but they are afraid that they will be fined. This is the main thing, the crucial point, that these people are afraid that they will be fined or they will have to cancel the tender or the bidders will take them to the court because they set some extra criteria not only environmental but as I said quality, social, whatever.

GM: And you also mentioned about the difficulty in the evaluation criteria?

DH: For 10 years, if they use ecolabel or other requirements, the administrative burden will not be so high or big or tough and we will help them. But there is small progress. So I think that the biggest barrier is being scared of being fined.

GM: How about for the supplier part? You already mentioned that they seem to be ready.

DH: Yeah. I have worked with GPP and ecolabel for quite a long time. So when I am, for example, in a petrol station, into the toilet, I look at the soap bottle and usually there is an ecolabel. It happens that hotels, petrol stations, restaurants, everywhere, there is the ecolabel soap and possible to have it in public places. Even private companies can't afford to pay double price for ecolabel soap, they can buy the standard.

GM: What do you think are the biggest barriers for them?

DH: Lack of demand, clear signal, some time in advance and uncertainty because even if they don't have a technology but they would have to invest in the technology quite a lot. They will be pushed to invest anyway some years because there will be a legal requirement. But now they have an incentive in a GPP but they have to see a clear signal that the government will follow this procedure for one election period.

GM: Are these barriers addressed?

DH: We try to explain that it's not necessary to be afraid, that environmental product doesn't mean low quality, higher price. We try to cooperate with the Ministry of Regional Development which is responsible for public procurement. So they will give a stamp on the toolkits and say they are fine because majority of public procurement in the Czech Republic will say these toolkits are fine, some of the public procurers will be okay.

GM: So there should be an assurance that it's fine.

DH: Yeah. But still when we discuss, there are still ministries and there are other offices and they have different views. But of course we try to address. The fear, political view and political signals of course have effect.

GM: What do you think is future direction of GPP or SPP in your country?

DH: We are trying to implement SPP in a new programming period of European funds, it's from next year. We will try to revise current requirements or current toolkits and introduce some more. I think it will be enough for some years. That's the plan and continuing cooperation with the working group, other ministries and offices, which, as I said, play a role in public requirement. Hopefully, we will have a green presidency in 2022. If everything will go according to plan, it can help to somehow show our sustainability. We'll see. I can say not really on behalf of ministry, but what I plan to do is that I will continue in workshops and I think that also the guys from Ministry of Social Affairs will organize workshops. We will do some promotional materials, publications, and try to explain that GPP is really important and we will try to reason, for example, that if they will follow GPP they can address some issues which are in their region. For example, they can help to solve drought or problems in waste or somehow connect to environmental issues or chemicals in production. We can lower usage of chemicals if we follow GPP rules.

GM: Do you think it would be necessary to make GPP mandatory? Do you believe it's good to make it mandatory somehow in later years?

DH: I remember a discussion in a GPP advisory group or how it was called at that time in the European Commission. In fact, the majority of member states said that if it's mandatory, it's not GPP anymore. It's just, let's say, a formal question. I remember a time when European Commission planned that there will be a clear line that ecolabel will show the requirements which will be mandatory in 10 years for example, or five years. GPP will use ecolabel which will be a requirement in three years. By this procedure, the European Commission will show the way, the legal standards will look like in a five, seven or 10 years in the future or in GPP in three or five or five years in the future. Of course when it will be mandatory, of course it will be. If it's the right way, I'm not sure. In fact, in some product groups, for ecolabel it's quite difficult to find that space for improvement. The only way how to differentiate ecolabel product from standard product is to write a number of criteria. Some years ago it was okay when the criteria document has like, five criteria. Now, it has 20. It works somehow in ecolabel because I think that in some cases we really focus on minorities. It's really difficult to find, as I said space for improvement or differentiation of standard product and ecolabel product. So I'm not sure when you set quite strict mandatory GPP criteria, it will be the end of voluntary GPP and ecolabel in some product groups

or it will really be difficult to find ways how to differentiate product in that group. If it's mandatory, it will vary because everybody will have to follow. It's quite clear answer on a clear question.

GM: You mentioned already about the European Commission GPP toolkits. Can you kindly elaborate more?

DH: They are applicable, but not easy. You still would have to have an expert and time for analysis and evaluation. The expert would have to check the validity of the piece of legislation or standards and situation on the market, about the availability of that product. And then experts on evaluation would have to evaluate if all criteria are filled because the procurer wouldn't be able. So of course, it will raise the cost because you have to pay for the expert. There is a mantra like, we have to save as much as possible or we will really justify why we invest more for public institutions. How they will say, it's true that we will probably give more because green products, they are slightly more expensive. Not terrible, but still a bit more in some cases and we will have to hire another external expert. So, we will pay 20-30% more because usually I think that the tenders are about 1 million koruna, I mean like 30 or 60,000 euros and you will pay, one or 2000 euros more for an expert. I was speaking about European toolkits, a standard procurer is unable to use it. They are not applicable.

H Interviewee FI Transcript

Interviewee : Katriina Alhola
 Organization : Finnish Environment Institute
 Position : Senior researcher
 Country : Finland
 Date & time : April 20, 2020, 9:00AM
 Duration : 56 mins
 Channel used : Skype
 Interviewer : Graciela Mante

GM: Can you tell me about yourself and your organization?

KA: My name is Katriina Alhola, I'm a senior researcher and I work at the Center of Sustainable Consumption and Production, a unit in the Finnish Environment Institute. I have worked in the field of sustainable public procurement since 2003 and I also finished my doctoral thesis in GPP. It was about environmental aspects in public procurement. At that time we talked about GPP but nowadays we talk more about SPP, Sustainable Public Procurement. We also take the social aspect in it. We work in SYKE, Finnish Environmental Institute, so it's just an acronym. We are a national research institution. My work is to do research on SPP/GPP, promote sustainable public procurement but in SYKE, we have experts in in many fields. I am also the coordinator of SYKE's work in the KEINO network-based competence centre, which provides procurers with information and experiences of GPP.

GM: You do research and advise the government based on it?

KA: Yes, we do that. We advise the government by doing research studies, and policy briefs related to the studies. Actually, in Finland, the process of developing sustainable public procurement is that we have governmental program which is written by our government, Sanna Marin's government, and there is actually quite strong will at the moment towards carbon footprints in public procurement, how to take carbon footprints and environmental footprint into account in public procurement. Also, they would like to make the National Public Procurement law a little bit more binding in this respect. So, there is a will in our government program and the Ministry of Environment is actually the one who's implementing these parts of a government program and we are advising. The government/ministries announced an open call, like a research call. It's announced by the Ministry of Environment and also other ministries are included. They announced the call and then we made a tender so we responded and we got that research. Other organizations might be competing for the same call, but we managed to win this and now we are actually doing research about how to take carbon footprint and environmental footprint into account. So, that's actually our research project that started this April. So, we are now trying to make some policy recommendations to the governmental level on how to proceed with this issue. This is maybe the latest or maybe the most accurate research at the moment.

GM: When did the country decide about SPP implementation? Was it a national initiative or a response to the European Commission's directive?

KA: In the beginning of 2000, Finland launched a programme for sustainable consumption and production in which also public procurement was seen as an important means towards sustainability. In 2009, the program was updated and a focal point for sustainable public procurement was established and took place in Motiva. However, it was already in 2004 when SYKE published the first guide to public procurers on GPP (Nissinen, 2004). In 2018, the government decided that different initiatives regarding GPP/SPP and different organizations promoting GPP/SPP should be be linked to get synergies and established KEINO-network. They decided that we should connect our knowledge and work together so that we could actually do more when we were like a network, rather than single organizations trying to do the same and

competing the same resources. So, in 2018 KEINO competence centre was established and Motiva took over as the coordinator. KEINO is a network of six organisations who used to promote GPP in their own. There's SYKE, we were doing research, which was then used by our government procurers and also VTT, which is the technical research center. We are the research centers in that consortium. Business Finland, which was formerly Tekes, they were the financing parts. They had the financing program for innovative public procurement, they focus on sustainable innovations. Then there is the Association of Finnish municipalities. So, six different actors are now working together in this network.

GM: Do you have a National Action Plan or a similar policy or legal frameworks?

KA: Government Decision-In-Principle on the Promotion of Sustainable Environmental and Energy solutions (cleantech solutions) in Public Procurement 13.6.2013, which is binding for governmental organizations and suggestion for municipalities. Hankinta-Suomi 'Procurement Finland' national level strategy (including GPP targets) and the Governmental program by Prime Minister Sanna Marin paying attention to making SPP/GPP targets more legally binding, taking carbon footprint and environmental footprint into account in public procurement in most remarkable product/service groups. Research project is currently undertaking in order to respond this.

GM: Which organizations are involved in the implementation of GPP in your country? What are their roles?

KA: The Ministry of environment which is leading the big picture, KEINO-competence centre, National strategy for public procurement coordinated by Ministry of Finance, and Association of Finnish Regions and Municipalities for legal advising.

GM: Is there a council coordinating all the stakeholders involved in GPP?

KA: No. KEINO-consortium plays the coordinating role, which is steered by the Ministry of Employment.

GM: So, do you meet regularly in KEINO?

KA: Yes, we meet quite often in the network. We share a platform and also we meet at least once a month. So we communicate all the time. So we work together, I would say.

GM: All members are actively involved, it seems. So you all work to make policies, procurement processes, and other related things better?

KA: Yes. We have common tools, several work packages or typical areas that we focus on. We try to promote public procurers to build procurement strategies, and we try to impact the decision making in the municipalities and how to make a stronger commitment to sustainable public procurements. One target is to have an impact on the strategic level. The other one is the so called procurers groups or, they're more like groups of procurers who aim at same targets. For example, in the field of low carbon construction, there are four municipalities and they build on targets together. And they will discuss in the group what kinds of sustainable targets they should build and put into their next tender competition. Then we also inform the markets and the potential suppliers about those targets at that target level, so that they can prepare themselves and also respond to that. So we try to organize market dialogue between buyers and potential suppliers in different areas.

GM: It seems there's already a great level of awareness for everybody. The business sector is also very much informed of the demand.

KA: Yes, they are also involved in this. And then one action that we do is spreading information. So, we try to raise the knowledge and also like capacity building type of action. Then the fourth one is the international cooperation. We also cooperate with similar competence centers. the Nordic countries and also the European level.

GM: But what is the level of engagement of the private sector with GPP?

KA: Follow through the industrial associations, but private sector is not very strongly involved in public procurement cooperation at least not in every sector.

GM: How about the status of the sustainable public procurement in your country? To what level has it been implemented?

KA: We have quite new research on this, which is done by the KEINO. So, we have asked procurers how they take social responsibility to consideration and we have asked how they take environmental responsibility into account. So, more than half, 58% of municipalities who responded to this inquiry said that they take social responsibility into account, but only one third, 32% of them actually measure or monitor how it's actually implemented in the real contract or contract period. Then 70% of the respondents said that they take environmental responsibility into account in their tender competition but only 41% of them measure the outcomes. So, environmental responsibility is more commonly taken into account than social responsibility.

GM: Do you also have targets for the adoption of GPP or SPP?

KA: We don't have that kind of numeric percentage, but it is stipulated in the governmental program that all procurements in which environmental aspect is considered important should be taken into consideration. So, it's not saying that 100% should be taken into consideration or 90% or something, but it's written so that when it's considered important and in those product groups or service groups in which the environmental footprint or carbon footprint is very high, which have very high emission factors, environmental aspects should be taken into account.

GM: So which categories are considered important?

KA: We are actually now doing the research where we are going to define those most important groups. But last year, my colleagues calculated the carbon footprints of Finnish public procurement at national level so we know already the several groups that we recognize that are probably the most important to us. They are heat and electricity, construction sector, energy consuming appliances and devices, transportation and vehicles, food and catering procurement, waste management. construction and reconstruction, and electricity procurement. Green criteria is recommended into account but it's not mandatory.

GM: So these are priority sectors for GPP implementation?

KA: Not necessarily priority sectors but of course different sectors develop GPP in different phases. For example, construction is developing quite fast.

GM: What are the environmental criteria included in the tenders?

KA: It depends on the product group. Examples are energy efficiency, euro-norms in vehicles, origin of electricity, construction material, use of renewable energy, organic food products, environmental management system, non-harmful substances, eco-labels, recycling of packages...

GM: What is the level of involvement of SMEs and other non-government agencies in the choice of these criteria?

KA: There are example criteria sets for 22 product groups. These have been developed in co-operation with companies. (https://www.motiva.fi/julkinen_sektori/kestavat_julkiset_hankinnat/tietopankki)

GM: What is the percentage of GPP with regards to GDP and the public procurement expenses?

KA: This has not been measured.

GM: How do you evaluate the bidders?

KA: Varies a lot. This is difficult to answer as not being a procurer myself.

GM: How is the certification done?

KA: Different certificates in use, for example ecolabels, or standard (e.g. ISO). Sometimes also a proof of supplier is acceptable.

GM: So how did that transition from the normal public procurement to sustainable public procurement go?

KA: Finland is still in its way but proceeding fairly well. I think it depends a lot on the procurer. So, large cities, on the other hand, also small cities maybe the front runners in this matter, but it's not systemic in Finland. I think that there are best practice cases and pilots quite a lot but implementing GPP is not systemic nationwide. Then there are other municipalities who actually I would say like, I haven't heard about it. So I think it varies a lot. But the big picture, I think it's quite okay if we say that 70% which was actually a result of our study takes GPP into account to some extent at least. So, it has been a long way.

GM: What were the initial mechanisms done to stimulate GPP adoption?

KA: For example, they have this development of KEINO consortium, they have really put some resources also to this issue. So, it's not only like giving some information but they have reserved some money in the public budget to make this GPP strong. I think delivering the information has been the main way of doing it also. Of course other means are like making it more legally binding and that's what we're doing now. So, it has been more like giving suggestions but not mandatory requirements for procurers, so it has been voluntary based. For the procurer side, the use of green criteria, should be more market dialogue, and pressure from customers for the supplier side. There's actually, I go back, a national level initiative. It's called Procurement Finland and it's a strategy that covers the whole public procurement field. So this is what government is now building. It's like a strategic document how this public procurement should be implemented regionally and nationally. Some are the objectives that the big picture is built, and then how it's going to be implemented. So this is called like Procurement Finland strategy. It is quite an interesting initiative.

GM: So what do you think drives the successful implementation of GPP? What will make them adopt it more?

KA: I think if we could increase knowledge about the benefits of GPP especially in terms of monetary benefits. How much money procurers can save if they buy this green option and they should look into the lifecycle cost of procurement not only the initial price. The regulatory frameworks and policies can be recognized as well as national and organizational objectives.

GM: What about the level of commitment from those in authority?

KA: Yes, in Finland I could say the level of commitment is quite high. But we don't know what will be coming next year due to this Corona crisis. So is there gonna be some cuts also, that is a risk that I see.

GM: What do you think are the barriers for the adoption of GPP or SPP?

KA: I think it's the lack of market dialogue and market information. I think procurers are too busy in their daily work, so they don't have time or resources to do market research. They don't know what kind of options there exist in the market and that's why they proceed as usual. So, that's why they buy traditionally, and they're not looking for new options, because they don't have time to do it. So, I think it's the lack of market information, or supplier or information. It's also maybe a lack of knowledge on how to use GPP and what kind of criteria could be used and how to link GPP into the procurement process. So, I think it's not only lack of knowledge, maybe more of lack of resources and lack of time. They also say that barrier is lack of experiences, then lack of examples. So, what we need more is good cases, good examples and that's one of our main duties to provide procurers with good examples. There is also an attitude or quite a free assumption that green options are more expensive. So, procurers always say that it's so much more expensive, so we can't afford it. Or there is a budget cut, so we can't even consider it. Because they don't see the lifecycle perspective, it's only the initial price that they actually look for.

GM: Yeah, so you need to make them understand more.

KA: Yeah. And then there's also this system in the process and the bureaucracy about that. So it's very bureaucratic to make these decisions in municipalities. So there may be other people who plan for GPP but then there are others who decide. They don't necessarily communicate.

GM: How about the suppliers?

KA: It is also the same, lack of market dialogue and market information. So it's also part of it. So, there is not enough communication between markets.

GM: Back to bureaucracy, yes, I heard about it and the very complex processes for GPP.

KA: I think it's a problem everywhere not only in Finland. Procurers are quite risk averse. So they don't want to take any kind of risks, because they will actually end up in court. At least in Finland, it's very common that those who do not succeed in the tender competition, they complain. That's why they look for any kind of even a small mistake so they can make a complain.

GM: How is the government addressing these barriers?

KA: They are trying make more clear instructions about how to use GPP and in which situation is it most recommended and now they are also planning maybe more legally binding instructions but they are not in place yet. So they are to be seen. Current governmental program started in 2019 and it's four years period for this government program, so 2023. The KEINO- competence centre provides tools for procurers on strategic management, network based development, information sharing and best practice examples.

GM: So you started already the implementation of GPP. What has been its impact?

KA: We have not measured the real impact (we have measured the use of green criteria). But a few years ago, there was a research, I think it was it was done by EU. It was maybe by a consulting company, financed by the EU Commission. It was a survey of the state of GDP in the European countries. So you probably know this research. I think it was done in 2009 or something or 2012 but many years ago, where they measured the level of GPP criteria used, how many criteria there are in the calls for tender. But measuring the amount of criteria does not actually say anything

about the real impact of the procurement. And that's what we don't measure. We don't know what's the real impact of using such criteria. So what we have measured so far is only the amount of using green criteria but not the real impact because we don't have that kind of systems or we don't know how to measure the real impact.

GM: But you have plans on how to monitor and evaluate these impacts?

KA: We are developing a monitoring system in the country level and through EU based surveys.

GM: Yeah. Maybe in the future, you can use the carbon footprint.

KA: Maybe we can or we can use our national databases. In Finland we have this system similar to the EU TED database where all those costs for tenders that are above the national threshold should be in the database, where we can collect the data. We should somehow keep the measurements into that database so we would have the whole threshold values of our procurements.

GM: So, how do you see the adoption of GPP in your country in the future? Do you believe that the whole country will be encouraged to use it?

KA: Yes, I think so. I think there's going to be pressure also from the market to do it and also from the end users. Already we can see that many companies are saying that actually procurer should ask for more. Companies say that they are ready to provide more or to provide greener products and systems, but actually the procurers don't ask them so, I think the market is getting ready, but the demand is still lacking. I think we are getting there. There are just some maybe also like organizational culture, all these things that actually prevent us getting there.

GM: What is the future direction of GPP in your country?

KA: Focus is on carbon footprint and environmental footprint of public procurement.

GM: What is your feedback on how the European Commission is carrying out this GPP initiative for its member states?

KA: It seems to me that they have promising initiatives, for example the European Green Deal. GPP is recognized as an important policy tool in many European level policies such as circular economy package.

GM: What do you think still needs to be done?

KA: We are discussing in Finland whether there should be more binding legislation in the area of PP.

GM: Are there further recommendations and insights you want to share?

KA: The topic is paid attention to more and more.

I Interviewee HU1 Transcript

Interviewee : Gabriella Havas-Kovács
 Organization : Public Procurement Authority of Hungary
 Position : Head of Department
 Country : Hungary
 Date received : May 12, 2020
 Duration : N/A
 Channel used : email
 Interviewer : Graciela Mante

GM: When and how did GPP initiatives in Hungary start?

GHK: The legal background of GPP was first laid down by the 2005 amendment of Act CXXIX of 2003 on Public Procurement. The amendment transposed the provisions on the implementation of GPP aspects specified by directives 2004/18/EC and 2004/17/EC.

GM: Do you have a National Action Plan or a similar policy or legal frameworks in compliance to the European Commission's directive? Could you please provide an overview of them?

GHK: There is no National Action Plan yet, however, there is one being prepared and its adoption is foreseen for the second half of 2020. As regards the legal framework, Act CXLIII of 2015 on Public Procurement (hereinafter: PPA) transposed the EU public procurement directives and provides several possibilities for the consideration of environmental aspects in the field of public procurement.

1) Preparation of the procedure

Pursuant to Article 28 (1) of the PPA, the contracting authority shall strive to ensure during the preparation of the procurement procedure the conditions for high quality performance, the protection of the environment - having regard to the subject-matter of the procurement - taking into account sustainability criteria.

2) Requirement of specific label

In line with the Article 59 (1) of the PPA, if the contracting authority intends to purchase works, supplies or services with specific environmental, social or other characteristics or intends to take such characteristics into account in the evaluation, the contracting authority may require the use of a specific label in the technical specifications, in the contract performance conditions or in the award criteria.

3) Optional exclusion ground

According to Article 63 (1) of the PPA, the contracting authority may prescribe in the call for competition, that such economic operators shall not participate in the procurement procedure, which have infringed the environmental, labour or social requirements, and such infringement was established by a final administrative or a final and binding judicial decision issued within the previous 3 years.

4) Invalidity of the tender

In line with Article 73 (4) of the PPA, the tender is deemed to be invalid, if it does not comply with the environmental, labour or social requirements laid down by legislation or mandatory collective agreement or the provisions on environmental, social and labour requirements listed in Annex 4 of the PPA.

6) Evaluation of tender

According to Article 76 (2) of the PPA, the award criteria can be:

- a) *the lowest price*: only in narrow circle
- b) the lowest cost
- c) *criteria representing the best price-quality ratio*, covering quality, environmental and social considerations

7) Specific contract performance clauses

Pursuant to the Article 132 (1) of the PPA, the contracting authority may set special conditions for the performance of the contract, in particular, conditions related to social and environmental considerations, as well as incentives for innovation.

Furthermore, the Government Decree No. 48/2011. (30 March) on the promotion of Environmentally Friendly and Energy Efficient Vehicles stipulates that contracting authorities and public service providers shall purchase environmentally friendly and energy effective vehicles.

GM: What is the current status of Green Public Procurement adoption in Hungary? To what extent has it been implemented?

GHK: The GPP tools of the directives are fully transposed in the PPA.

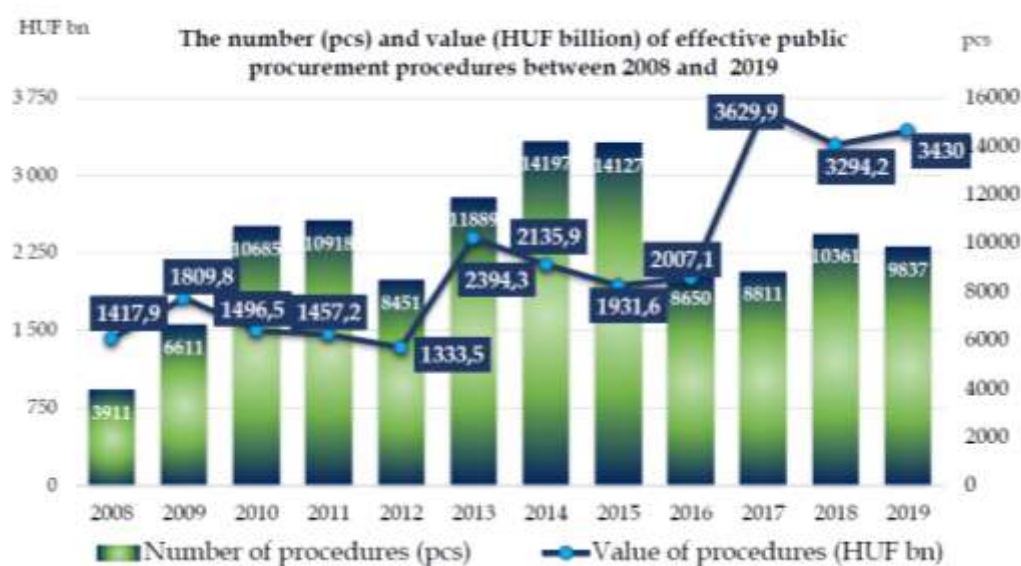
GM: Could you please provide the targets set and the percentage of accomplishment?

GHK: There are no targets set currently.

GM: What is the percentage of GPP with regards to GDP and the public procurement expenses?

GHK: The value of Hungarian GDP are available on the website of the Hungarian Central Statistical Office: https://www.ksh.hu/docs/eng/xstadat/xstadat_annual/i_qpt001.html

The diagram shows the value of public procurement procedures between 2008 and 2019:



The Public Procurement Authority has collected statistical data on green aspects applied in public procurement procedures since 1 January 2012. Data collection is only possible below EU thresholds, as EU notices do not allow for the collection of information on green public procurement. (The value of public procurement procedures below EU thresholds was HUF 827,3 billion in 2019. Data for previous years are available in the Authority's annual reports: <https://www.kozbeszerzes.hu/cikkek/annual-reports>)

Contracting authorities are obliged to indicate in contract award notices of procedures below EU thresholds whether green aspects were applied in the procedure.

In 2019 contracting authorities conducted **916 green public procurement procedures, spending in total HUF 119,8 billion.**

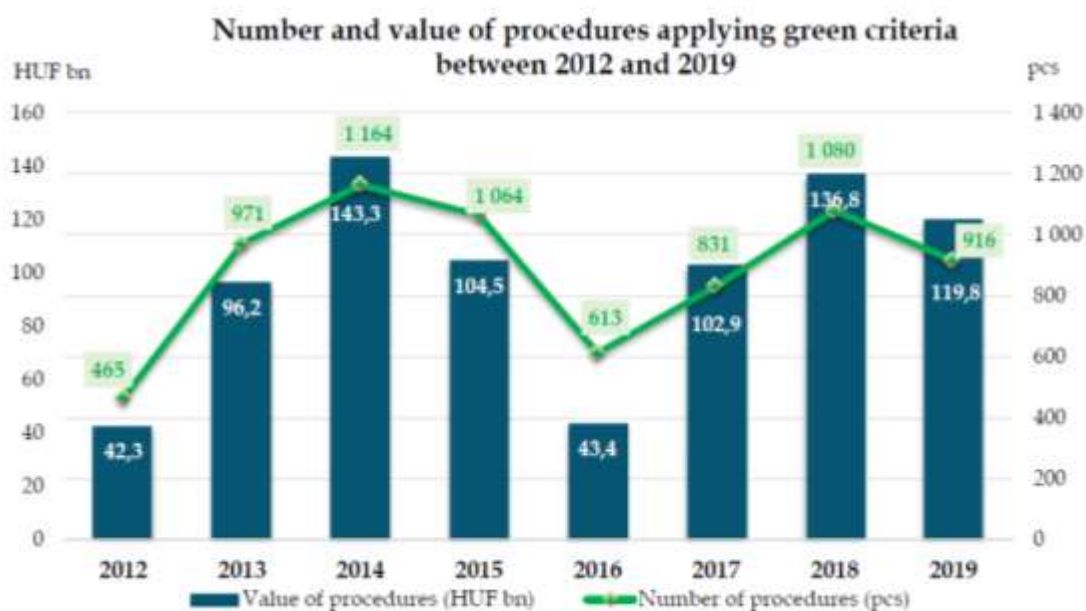
12,6% of the public procurement procedures below EU thresholds applied environmental aspects in 2019.

In 2019, the proportion of green public procurement procedures according to subject-matter was as follows:

Subject-matter	Number of procedures	Value of procedures
Green public works	760 procedures	HUF 109,4 billion
Green public supply	100 procedures	HUF 7,8 billion
Green public services	56 procedures	HUF 2,6 billion
Σ	916 procedures	HUF 119,8 billion

As regards the subject matter, contracting authorities considered environmental aspect mostly at public works: this represents 17,1% of public works below EU thresholds and 17% in terms of the value of procedures applying environmental aspects.

The diagram shows the number and value of public procurement procedures applying green criteria between 2012 and 2019:



GM: Which organizations are involved in the implementation of GPP? What are their roles?

GHK: The Prime Minister's Office is responsible for the preparation of the related legislation, while the Public Procurement Authority of Hungary (hereinafter: Authority) initiates with competent persons the preparation or amendment of legislation related to public procurement. The Council operating within the framework of the Public Procurement Authority (hereinafter: Council) as well as the Minister responsible for public procurement (Minister heading the Prime Minister's Office) are assigned with issuing guidance concerning the practical issues of public procurement.

The Authority expresses opinions on issues of interpretation in matters of principle in cooperation with the Minister responsible for public procurements - if necessary - in order to help contracting authorities during the preparation and conduct of procurement procedures.

The Authority's objective is to raise awareness to the importance of green aspects and to disseminate information on the opportunities to promote GPP, on the relevant regulations and on best practices and follow the updates in Hungarian and international GPP practice. The Authority organizes GPP related conferences, issues guidelines and has a website covering sustainable public procurement.

GM: Is there a council coordinating all the stakeholders involved in GPP?

GHK: The Council has objectives to safeguard the application of the basic principles of Act CXLIII of 2015 on Public Procurement, to ensure the specific objectives of public interest as well as the interest of contracting authorities and tenderers. The members of the Council are delegated by representatives of tenderers and contracting authorities, as well as by organisations promoting certain public interest objectives.

GM: To which categories is GPP implemented in your country?

GHK: In Hungary, green public procurement can be applied to any subject-matter.

GM: Do you have priority sectors for GPP implementation? If yes, how are these ranked and who decides about the final priority list?

GHK: There is no priority sector for GPP implementation in Hungary.

GM: What are the environmental criteria included in the tenders?

GHK: Statistical data is collected exclusively from data included in the contract award notices, data of the call for competitions are not analyzed, they are only searchable. For the reasons mentioned above, no review or analysis has been made on the outcome of applying environmental criteria.

GM: What is the level of involvement of SMEs and other non-government agencies in the choice of these criteria?

GHK: The Authority has no information concerning the level of involvement of SMEs and non-government agencies in the choice of GPP criteria.

GM: To which stages of the procurement process are they applied?

GHK: According to the contract award notices, green criteria can be taken into account in the course of the procedure:

- As a contractual criterion
- As an evaluation criterion
- As part of the technical specification
- As environmental measures specified in suitability criteria
- An compliance with environmental management systems specified in suitability criteria

GM: How did the transition towards GPP go?

GHK: As green public procurement is not mandatory in Hungary, contracting authorities continue to apply green aspects to a limited extent.

GM: What are the initial mechanisms done to stimulate GPP adoption?

GHK: In order to promote sustainability and disseminate best practices and make them available for the public, the Authority launched a programme titled “2018 - The Year of Sustainable Public Procurement”. In the framework of the programme, the Authority established two prizes:

- **Public Procurement Prize:** The aim of the Prize is to encourage the actors of the public procurement market to strive for high level professional standards during conducting procedures. In 2018 and 2019, the Prize was given to most sustainable public procurement procedure.
- **Public Procurement Award:** The Public Procurement Award is awarded each year in a topic closely related to public procurement – which was sustainability in 2018 and then innovation procurement in 2019.

The Authority launched its programme titled “Focus on Innovative Public Procurements 2019-2020”. The Public Procurement Prize and Award were announced in 2020 as well, and the submission of applications is ongoing.

GM: What drives the successful implementation of GPP in the country?

GHK: The organization of trainings and conferences, the issuance of guidelines increase the contracting authority's interest in the application of green criteria. Still, best practice examples seem to be the most effective incentives.

GM: What have been the barriers in the adoption of GPP in Hungary?

GHK: The main barriers are the following:

- Contracting authorities consider GPP to be time-consuming, difficult and expensive,
- GPP also is often considered to be an audit risk at EU funded procedures,
- Lack of knowledge,
- Slow decision making procedures,
- The main goal is still to spend the possibly least amount of money,
- Annual budget, difficulties regarding long-term planning,
- Language barriers when attempting to get to know international best practices.

GM: How are these barriers addressed?

GHK: The Authority seeks to draw attention to the importance of GPP by spreading information and best practices, by organizing conferences, by publishing studies and other publications on its website and in the Daily Public Procurement mobile application and also by publishing GPP related guidelines.

GM: What have been the impact of the implementation of GPP in your country?

GHK: There is growing awareness, such as for instance in the public procurement procedures conducted by the Municipality of the City of Budapest Mayor's Office it is mandatory to consider the application of sustainable and green aspects in all stages of the procedure.

GM: What is the future direction of GPP in Hungary?

GHK: Main goals are to further disseminate best practice examples of green public procurement and to adopt the National Action Plan on GPP as soon as possible.

J Interviewee HU2 Transcript

Interviewee : Julianna Batta
 Organization : Public Procurement Authority of Hungary
 Position : International Legal Advisor
 Country : Hungary
 Date received : May 20, 2020
 Duration : N/A
 Channel used : email
 Interviewer : Graciela Mante

GM: Are you following a centralised procurement model?

JB: Yes, Hungary follows the centralised procurement model, the Directorate General for Public Procurement and Supply (KEF) acts as a central purchasing body for central government institutions. Use of the KEF is mandatory based on product categories, specifically for stationary and office products, and motor vehicles. In terms of central IT procurement, the newly established Digital Governmental Agency conducts the procedures as of 1 November 2019.

GM: What certifications are you currently using in GPP?

JB: Certificate of compliance with environmental management systems or standards is used, which is issued by bodies attesting environmental compliance.

GM: How do you evaluate and monitor the impact of GPP?

JB: Currently the impact of GPP is not evaluated and monitored in Hungary.

GM: Do you think GPP should be mandatory?

JB: Currently the legislator did not consider mandatory GPP provisions necessary, however, this may change in the future. In my view, contracting authorities are most influenced by practical best practice examples; yet, a change in the attitude is obviously needed to move towards better GPP implementation in Hungary.

GM: How satisfied are you with the efforts of the European Commission in GPP development? Are the toolkits and other information materials enough? What do you think still needs to be done?

JB: The toolkit and the materials on product group specific GPP criteria are useful indeed, the best practice interviews published in GPP News Alert are also inspiring. The training programmes launched recently in countries with low GPP uptake like Hungary are also more than welcome. The new initiative of the Commission on mandatory GPP provisions will certainly make a difference.

K Interviewee IE Transcript

Interviewee : Bernie Kiely

Organization : Department of Communications, Climate Action and Environment
 Position : Assistant Principal, Waste Policy and Resource Efficiency Division
 Country : Ireland
 Date & time : May 6, 2020, 10:00
 Duration : 60 mins
 Channel used : Zoom
 Interviewer : Graciela Mante

GM: Can you tell me about yourself and your organization?

BK: I work in what we call the Department of Communications, Climate Action and Environment, which is the government ministry with responsibility for environmental matters as well as a number of other portfolios. Within the environment side, we would have responsibility for climate action, as well as air quality, waste policy and resource efficiency and a number of other miscellaneous environmental issues. My particular area is waste policy and resource efficiency and the circular economy. So within that portfolio, green public procurement is one of the issues that I deal with. There's a lot going on in those areas. Sometimes the work can be superficial, because you don't have the time to get down into the depth and being a small country with a small administration, it's a big challenge to have adequate resources, to pursue all the policy objectives as far as you would like. I suppose being a member state of the European Union, a lot of our policy is driven by the European Union and the economy policy in particular. Just recently we have the second action plan published and in terms of green public procurement, we were delighted to see that features again and that there is the possibility of mandatory targets being discussed. We know that will be difficult, but we think that that is probably the only way that you will get some satisfaction and in getting green public procurement to take root.

GM: When did the GPP initiatives in your country start? Was it out of compliance from the EU directive or an initiative of the national government?

BK: It was more an initiative of the national government. One of my previous colleagues, I think he was studying a master's in university and he took on the green tenders project as part of his master's that was published in 2012. It probably got underway at about 2010 or earlier than that. In a way it probably came bit too early for us and we had a national policy that was signed off by two government ministers, but it didn't have a lot of traction with the stakeholders. It needed a lot of work after the publication of the plan to train people, to provide them with resources. Well, there was no directive requiring green public procurement at that time that I'm aware of, because I'm not a procurer. So my understanding was that this was more or less taking advantage, I suppose of an opportunity because there were no mandatory targets. We were going to come up with a national response but on a voluntary basis, and that we would go for this voluntary political target of 50%. It was great to have the action plan but it came at a time just before the financial crisis, and there was a big change in the procurement landscape in Ireland at that time. There was a new centralized government, procurement agencies that held the Office of Government Procurement. Because of the difficult circumstances we found ourselves in economically, their ways on debt really was to buy as much as they could, as cheaply as possible and green public procurement took a backseat. While our environmental protection agency produced a very nice manual guideline on how to undertake green public procurement, I think there was really very little that was done practically to give effect to the action plan and to the guidelines. This is a fact, we're kind of on the second wave of this now, and we're hoping that we can measure success this time.

GM: So when did the latest green tenders action plan published?

BK: Well, there's only one version and that was like 2012. It's still in place until I suppose we replace that. For the purposes of the *GPP4Growth* project, the *Interreg Europe* project, we have devised another action plan, but it's not a national policy. It's more, I suppose, for the immediate

term, as a means of bringing to life some of the latest developments related to some of the progress that we've made with, for instance, these government circulars that issued in 2019 and from the Department of Public Expenditure and Reform, DPER. You'll see that circular on our website where they're encouraging government departments or public bodies to use green criteria as well as other social considerations. Time has moved on but the national action plan for green tenders is still technically in place until we may revise it, but we haven't taken that decision just yet.

GM: Back to the *GPP4Growth*, how were you able to connect with the project?

BK: We were approached by the Greek consultants who were putting the project proposal together. They were working probably on behalf of University of Patra and they were looking for partners around Europe to join the project. Because we were struggling to find some way of gaining traction for GPP, how we conduct our project might give a structure and a discipline to holding workshops, running training courses, producing support and guidance. While it was a lot of work, it created a community of people who are interested in engaging on Green Public Procurement.

GM: What is the current status of GPP adoption in Ireland? Have you reached the 50% target?

BK: It's very difficult to know, because GPP is a very difficult thing to measure. It depends on your definition of green procurement and how you counted. So I would say, because so many of the EU directives require a basic degree of environmental safeguards anyway, I think probably a lot of our procurement has some element of green in it. To reach 50% your contract has some element of green procurement in it. One day, we probably need 50 but I think everybody agrees that it's not enough. I noticed recently that the UN has come up with some indicators on ways of measuring sustainable procurement which looks quite interesting. Have you seen that, Graciela?

GM: The one with social criteria and indicators regarding labor?

BK: Yeah. But it's one of those things, it's very difficult to talk about just the environment anymore. Once you talk about sustainability, then it takes in all those other aspects and dimensions. European Union similarly has struggled with measuring GPP. I suppose we haven't spent too much time worrying about measuring because there is so much else to do. We feel that if we tackle training, tackle guidance, communications and awareness, that at some point, the UN or the EU or somebody will crack the measuring and we'll go along with what they're doing, rather than trying to necessarily worry too much about measuring ourselves.

GM: So you're at this point where you're more on awareness campaigns and training? Does it cover most municipalities in Ireland?

BK: Yes. We're really just at the beginning of devising a specific training course for GPP. I suppose you know from your studies that to have successful GPP you need procurement people who understand environmental concerns. You also need people who are specifying and the end user needs to understand procurement. So you need the whole organization or many parts of the organization to collaborate if you're going to have successful GPP. I suppose that's what we've been trying to do is to bring together the various types of people within an organization and to have that dialogue around GPP, and to see how those collaborations can take place. We felt that one of the problems with procurement was that on procurement people. In the public service, it's not a profession. One day you might be working in personnel or in national parks, and the next day you're working in procurement. So you don't have the skills and you have to learn them on the job. I think that means that people don't have the confidence to do anything that's seen as risky. So they're very conservative, and they just stick with the rules, or whatever it is that they've been told to do. And if somebody in your organization says, oh, I'd like to do some green procurement around this particular issue, well, then, the procurer is often very conservative and resistant to that. So, we're trying to help, we're trying to encourage the procurers to become more professional,

and also then to support them by getting a dialogue going with other members of their organization so that it's not left to them alone. We've used other issues that have come along, like the climate crisis, and sustainability, to engage with public sector organizations. We have started an initiative called *Green Government*. This has been a way for us to engage with the broader organization around things like, is your organization sustainable, how are you managing your waste, are you reducing your food waste, what's your energy efficiency like, are you saving water. Then using that engagement to say, and what is your procurement policy? Are you buying green? So that kind of opens up the relationship then in a dialogue between the people in the corporate area and the procurement people. We've had some very interesting and dynamic engagements between those different parts of the organization and that's where the greatest gains have been made. So you feel like you're talking to an entire organization rather than just a procurement department.

GM: You mentioned about dialogues and collaboration. So which organizations, ministries, are involved in the implementation of GPP?

BK: The Department of Public Expenditure and Reform which is kind of like the finance ministry in Ireland have the responsibility for national procurement policy. We obviously have to work very closely with them to bring them around and so that they take account of green criteria. Their function is not just policy, but also they design procurement frameworks for the entire public sector. They would put together competitions to supply electricity to the public sector or paper supplies or catering supplies. They run the competition and then they nominate a supplier and then every public body can use that supplier or a panel of suppliers.

GM: So there's a centralized procuring authority?

BK: Now it has limited application because it's not mandatory to use, those centralized frameworks. I think the value of the drawdown under their framework is around 400 million euro of a 12 billion euro public spend. So it's relatively small, but you know, it's getting bigger. So we have been working with that organization, the Office of Government Procurement. It's an arm of the Department of Public Expenditure and Reform.

GM: Are local governments also covered or it's just within the ministries?

BK: The ministry dictates the policy for local governments, too. The local authorities can draw down from those frameworks also, but they don't have to. They're also a partner in the centralized procurement and model. So if you imagine you've got the Ministry for Public Expenditure and Reform, at the top, and they're setting policy, and then one of their offices is the OGP, the Office of Government Procurement and they collaborate with a number of other bodies, including the local authorities, so the local municipalities, and they set up these contract frameworks for the entire public service. We've been trying to ensure that when those frameworks are being tendered, that there are green criteria included and that way we can multiply our influence across a much bigger area.

GM: For the dialogue, is there also a group representing the private sector, like the Enterprise Ireland? Also, do you have a certain council for GPP?

BK: We have concentrated up to now on the public side of things. But we have had a conversation with the OGP on speaking with the suppliers so that they will know what the new specifications mean, what the new criteria is about and prepare their response. The complete barriers with the OGP can be reluctance to share for data protection or for competition reasons. They have concerns around allowing us unfettered access to their clients but we have had engagements with the Enterprise Ireland and with IBAC, the Irish Business and Employers Confederation. They would be a very important business representative. We don't really formalize networks. We do have a new project that we are funding on circular manufacturing and it is working with a number of

Irish businesses in manufacturing. It has just started and they had a lot of difficulties with COVID-19. But one of the topics that they have selected for working on a project is circular procurement. That will be an interesting engagement, working with manufacturers, with business, to see what their perspectives are. That will be a new area for us and should give us interesting insights into that side of things.

GM: For the categories, I also read on the links you gave me that there are eight priority categories in Ireland. To which categories have GPP been mostly applied and what are the major environmental criteria usually used for these tenders?

BK: Well, without any evidence and measuring, it's hard to know which are the most important or which ones have been more successful. So that's the difficulty. We're relying on the most common categories because there seemed to be a mixture of where there's a lot of expenditure, and there is scope to make to include green criteria without too much difficulty. So it's going for the low hanging fruit, and it's going for what is most accessible to the public bodies.

GM: How is the evaluation of environmental criteria done? How do you check if the environmental criteria are fulfilled?

BK: Again, it's down to the purchasing body to decide how they apply the criteria. We haven't got involved to that degree with them yet. We have proposed to the OGP organization that we would like to examine those tenders where green criteria are included to see then how that has translated into reality. It's typically in criteria and it's evidence there in the product or services being delivered and hasn't met expectations, but that's for the future. We haven't done that yet. But we're operating at kind of a high level of influence rather than holding the hand of the procurers. The training courses are being designed now and prepared. Then we're updating our guidance, the 2014 document from the EPA for the public procurers, you've probably seen that.

GM: Yes, it looks very good. All the steps are there and they're very easy to understand.

BK: Yeah. So we're updating that now and one of the people who would have designed the GPP toolkit, Abby Sample, she's an Irish woman, and she's working with us on updating the green criteria.

GM: So, you're developing your own toolkits? Are you not using the EU toolkits?

BK: Yes, we are, but we're making some changes for our own national conditions in order to try and help the procurers because if you don't, they say, oh, well, it's different here. So you have to make it as easy as possible for them.

GM: Is there a preferred certification system there? Do you have EMS, EMAS, ecolabels?

BK: EMAS and I think we have one company in Ireland who has an EMAS certification. So very, very, little. We have had a number of inquiries, though, from other organizations who are looking at getting EMAS-certified. But that was before COVID-19. The world has been turned upside down so we don't know whether they will still be in business or whether they will have corporate changes. We have ecolabel, yes. Some of our products that we would buy would have ecolabel. I'm not sure whether there is a big uptake amongst Irish manufacturers to use ecolabel. I don't think so.

GM: How about life cycle assessment?

BK: I would say it is done but not very much. It is because it is very difficult. We had a conference last year and we brought over some of the procurers from the Netherlands and we had one speaker who had developed a system for the Netherlands on a carbon calculator. It's a fantastic system,

but very complicated and you need an entire ecosystem of experts around you to support those kinds of systems. We can't just have one person on their own.

GM: Yes, I believe Netherlands is one of the countries with advanced GPP systems.

BK: Every culture in their organizations is dedicated to sustainability. So everybody understands, everybody agrees that it is a priority. Whereas in other countries like Ireland, I think it's a marginal concern. So if you want to introduce GPP, or you want to use carbon calculator, you have to persuade other people why you need to do it. Whereas in the Netherlands, it seems everybody agrees.

GM: So, it connects to my next question, actually. How was the transition to GPP? Were people more accepting or was there some resistance?

BK: Yeah, I think it has certainly improved. There has been a lot more engagement and I think the priority now that has been given to climate action has helped. There is much more focus on, well, if you're going to spend your money, surely you need to spend your money in a way that you want to have an impact on the market and environment. I think from the public sector point of view, and from a political point of view, it's been recognized that our purchasing policy has to be consistent with the political policy. We can talk about climate change and then go off and buy for air quality purposes. We need to speak with our money. And interestingly, when you do get into discussions with manufacturers, with other bodies, with environmental NGOs, public procurement is always one of the top means identified for making a change. Now, that could be right but that doesn't make it easy. I think many people believe that public procurement can be done by the procurement department. That's not true and not fair and it means a whole organization needs to change its policy. But that's more difficult. But then we're in at the moment, in a negotiation period for a new government in Ireland. We had an election a number of months ago and we still don't have a new government. But it looks like that the Green Party are now going to be a partner in our coalition government and green public procurement is one of the fundamental principles of their involvement in government. So we expect that it will get some fresh blood and be a new impetus from government. They also are obviously putting climate action at the top of the agenda but they have to recognize that GPP is a very important way of influencing change.

GM: You mentioned already about the initial mechanisms done to stimulate the adoption of GPP. You published already some guides for the public sector and you also have the action plan, the trainings, awareness campaigns. But how about the supplier side? Do you also have a guide for them?

BK: Not yet. It was our intention that we would publish the procurement guide for buyers, and then do one for suppliers. The buyers one was so slow to catch on that we didn't do one for suppliers but maybe we will do now. I think the suppliers, in fact, have been probably more willing. Individual companies have approached us. I think it's useful that the OGP are including more green criteria, because that's sending a signal to the market as well.

GM: What have been the drivers for the successful implementation of GPP in your country?

BK: I think high level policy direction is very important, because you do need the whole organization behind the policy. I think our old GPP circular last year was very important in sending a policy signal. Now, we have the second circular economy action plan and the signals coming from that are that there will be more GPP, there will be mandatory GPP. Again, that will be an important policy driver to what is happening nationally. I think that it's one of those things that you need to show, that commitment and that you need to equip the people on the ground with the tools to give effect to it. So that's where our training and our guidance comes in.

GM: How about the barriers of adoption?

BK: I think if there is an economic downturn following COVID-19, that will be a barrier because people still have a perception that green is more expensive. That's not always the case. You're trying to convince people that it's not sustainable to buy cheaply either because it gives you more costs in the longer term. I think the lack of professionalization in procurement is one of the barriers because I can see in our *GPP4Growth* project, one of the partners is from Antwerp and the procurers there are very professional and they're very confident and they embrace GPP as part of their job. They understand, they recognize that as part of the reason. One of the skills that they have is that they can deliver green procurement by how they devise a tender and how they have it purchased. So I think, if our procurers were better trained and more confident, I think we could have more GPP adopted.

GM: How about for the supplier side, you mentioned they are probably more willing to adopt GPP. But what do you think are the factors hindering other suppliers to adopt GPP?

BK: We have a lot of small and medium enterprises in Ireland. Most of the suppliers to the public service are SMEs. I think they find it difficult to have the capacity to make the changes required. They often just have a small number of employees and they don't have the management, time or expertise to change their products, change their offering or even articulate differently. They might have good offering, but maybe they're not very good at marketing it or unable to engage with the market in the way the market is demanding. So I think there is a gap between a big national tender and then the small suppliers. There's a capacity issue there probably in the SMEs. We've worked with Chambers Ireland who are representative body for local businesses around the country and we're trying to get them to engage with their members on how best to embrace GPP and respond to it.

GM: Did discussion on financial assistance come about?

BK: We don't have funding in terms of, say for individual businesses, that's very difficult. But there are a lot of agencies and a lot of bodies around that help businesses. We're trying to influence those organizations, the Enterprise Ireland or there are local offices in all the municipalities called local enterprise offices, LEOs, and they provide a very good support service for local businesses.

GM: I learned from other countries that there were instances about legal issues in green procurement. Did you also encounter the same in your country?

BK: No. I'm basing my comments on the observations of one of our experts, Abby Sample who is involved at the EU level. She's a lawyer, and she designed the toolkit for the EU. She said there is a perception that there are a lot of legal challenges to green procurement tenders, but the reality is that there's very few challenges all together. That could be because there isn't a risk or it could be because the people doing the tender actually put together very conservative tender. So it's hard to know but she says there is a very low rate of legal challenge to contracts here of all types.

GM: What benefits do you expect to get out of the implementation of GPP?

BK: Well, I think we would like to see local companies and local businesses taking advantage of green criteria so that they would get the public sector business, that it doesn't all go abroad, and that some of the broader parameters around carbon foot printing, that they can take advantage of having a local supplier and that would be to their advantage. We would like to see if, for instance, some of the green criteria might include products that are more repairable, then we would have more local businesses involved in repairing and that would be more potential for returning products and to have that kind of circular business potential. The offering of green services rather than products, where you can now buy light as a service and necessarily bridging those aspects

so that there are greater efficiencies but there is more sustainability with a positive impact than in a local business, local communities.

GM: You already mentioned that it's difficult to monitor and evaluate the impact of GPP and its development. However, do you have plans on how to do this? How would you monitor also the extent of adoption of GPP in the future?

BK: I think we probably rely on a mixture of the formalized monitoring and evaluation, what comes from the UN or what comes from the EU, and then we will also do our own national study of looking at procurement and what our expenditure is and then to try and do some research on how many tenders have green criteria. But that's for the future. At the moment, we are not actively monitoring. We wanted to include on e-tenders a checkbox to say if green criteria is included, but that seems to be very difficult and it all takes a very long time to make changes to each tender. But I think there will be something in another two to three years. For now, it's kind of soft monitoring in terms of engagement with public bodies rather than hard data.

GM: About the future direction of GPP in your country, when do you think will it be fully adopted? Is the path going towards sustainable public procurement and circular public procurement or have you started already with them? Do you also think it should be mandatory?

BK: I think GPP is already becoming sustainable procurement. So we're going to be working across and many other different topics and interest points, be it social justice and inclusion and gender equality. We will be incorporating our message with all those other indicators of well-being and progress and that's not a bad thing. My fear would be though that in the time of economic depression, that maybe all those things will be thrown out the window. I can see that a more holistic approach would be the future direction you know, and more circular as well. And do I think it should be mandatory? I think there should be mandatory elements. I think that helps to focus minds and I think that helps just to get a foothold in procurement as well. I think the EU has already put down mandatory targets for electric vehicles. So if they extend that to other elements, then it would provide a very interesting and kind of a project to look at how that works and be able to monitor and evaluate those impacts.

GM: For the EU Commission's efforts on GPP, do you think there's still more that needs to be done?

BK: I think there are some very valuable elements to the commission's support of GPP. But I think it needs to be mainstreamed across all its areas of activity so that it's not just a specialization of the environmental directorate. I think it needs to be more front and central in the economic side as well.

GM: Are there any more insights you want to share about GPP?

BK: It's been quite a very positive experience, the last number of years. There has been much more positive engagement and we have discovered small projects that have been happening spontaneously around the country. People never really thought of it as GPP but it was something that individuals wanted to do. It's nice to be able to harness the passion of a small number of people. I think the community and the network is really important in building that across the country where people come and share their experiences and give others case studies of things that they have done. That then provides confidence to others to do the same thing. Between the municipalities, there could be a little bit of competition, and that one municipality would say that, oh, in Dublin they're doing this and then we want to do it, we can do it better.

GM: Good competition.

BK: Good competition, exactly. Building that community has been a very powerful development for our purposes, but we need to be able to do deliver to that community now in terms of resources and training in order to build on a score, I think, or it won't last. So it needs a sustained focus and it needs sustained resourcing as well.

L Interviewee IT Transcript

Interviewee : Nicolò Tudorov
 Organization : Central Directorate for Environmental Protection, Energy and Sustainable Development, Autonomous Region Friuli Venezia Giulia
 Position : Head of Office, Office for EU Programming and Sustainable Development
 Country : Italy
 Date & time : April 29, 2020, 2:20PM
 Duration : 86 mins
 Channel used : Skype
 Interviewer : Graciela Mante

GM: Can you please tell me about yourself and the organization and what are you doing about GPP?

NT: So, my name you already know, it's Nicolò Tudorov. My position in Italian is called position *organizzativa*. I am not the director but I am a "head of office". My office is called EU Programming and Sustainable Development and we are part of the Regional Department for Environment, Energy and Sustainable Development. Friuli Venezia Giulia, which is my region, is an autonomous region in Italy. I don't know if you know it, but Italy has 20 regions, five of them are autonomous, have stronger autonomy on a certain number of issues. The Department of Environment, Sustainable Development, Energy has the competence for all these issues leading to environment which are quite a few as you can imagine. We go from waste management to all that is linked to energy, to water management and geological issues and many issues into the environment. My office is in charge of a few horizontal issues. One is, in Italian is called, *Autorità Ambientale*, environmental authority in English. As such, we are representing the environmental issues in all the EU programs that are managed by the region. So, from rural development program and ERDF program and the Interreg. We are also in charge of drafting the Sustainable Development Strategy of the region. So, those are our main competences. We are also in charge of developing the GPP policy of the region.

GM: By the way, are you using GPP or SPP in in your region?

NT: GPP.

GM: What is the status of GPP implementation in the country or more specifically in your region? Do you have a National Action Plan on GPP?

NT: Yes. I'm checking on it because that's national. While there is this communication from the commission COM 2003(302) on integrated policy of products, and based on that, as a development of that, the Italian Ministry of Environment, drafted the first action plan, which was adopted on April 2008. That was the first one and it was updated in 2013. After that, the bigger step was taken in 2016. In 2016, the new Public Procurement Code was adopted and in that code, there is a specific article on GPP, the article 34. I have the English version of the national plan for GPP so that I can send you. This is the one that can give you a little bit what was the situation in Italy at that time. It's interesting for you. The Article 34 says that the Ministry of Environment has the competence to draft specific, in Italian it is called, '*criteri ambientali minimi*' which is translated minimum environmental criteria. So, these are like the standards that the products or services need to follow in order to be considered as green. The Ministry of the Environment has the duty to draft these standards. What the Code of Public Procurement says is that when a standard is active, all public administration if they want to do a public procurement about that product, about that service, they are obliged to apply the standard.

GM: So, is it mandatory?

NT: It's mandatory, yes. We have a number of standards. By the way, in the commission documents there is a study of the European Parliament on GPP and there are also other studies where I think you can find information in English on these where they do a relation between the different countries. We have minimum criteria for 18 products and services and there are 12 more sectors that are being drafted. Good number of all those- furniture, tables, chairs for buildings, how to build and restoration of buildings and also roads, waste management, management of public parks, energy services. electronic, for clothes, office supplies. For catering, we have quite a few because we have public schools, we have lots of canteens. And cleaning of buildings. So there's quite a few. For all these sectors, these are mandatory. This is at the national level.

GM: How does the system of government work in Italy? Do regions follow whatever is mandated from the national level?

NT: It's a little bit complicated because, let's say, regions also, they do regional laws. So in the constitution, you have some matters, some competencies that are only for the state and some are for the regions. For autonomous regions, which is our case, you have more competencies than the ordinary regions. So you can make a law in many more subjects than the other regions. But public procurement law is national. So in GPP, what's the role of the region is the one of developing GPP.

GM: So you don't have a specific law for GPP in the region?

NT: No, but we have a regional action plan. So in our region, in April 2015, an interdepartmental working group was set up, with a representative of many departments, coordinated by my Office. This group was in charge of drafting the regional action plan and now is in charge of implementing it as well as to update and monitor it. The plan was adopted in 2018. It lasts three years, we end at the beginning of 2021. After, we will likely have a new one.

GM: You're done with the policy stage in your region. So you have been implementing the plan now?

NT: Yes.

GM: And how many municipalities are under your region?

NT: We have I think 215.

GM: So many. It is a really big region.

NT: Oh, no. There are bigger regions than ours. In Italy we have nearly 8000 municipalities. This is sometimes a problem because many municipalities are very small. For instance, we have a municipality of 282 inhabitants. That's very small. But what does that mean, that offices could have troubles in managing public procurements which are becoming more and more technical. To apply these standards for GPP is not easy because the official has to be able to evaluate if the tender is compliant or not. So what was set up in the framework of the national legislation, we have a regional buying entity. It means that we have an office inside the region that makes the framework contracts. So municipalities participate to this contract, but they don't do all the working of selecting. They just say, okay, we need this.

GM: So that somehow addressed the limited number of personnel in small municipalities?

NT: I would say one of the main problems that we have now at the local government is this one. The administration is becoming more and more specialistic work. Public procurement rules are

more and more complicated and more and more specific. And so, to be able to do the job, you have to specialize somehow.

GM: Do procurers in the municipalities also have other tasks aside from procurement?

NT: Yes, that can be a problem. You can have a very small municipality with, let's say, only two officials. They would hardly be able to perform even basic tasks. They could join with another municipality for instance, but the population would not always be favorable about this move. That's an issue. So, local administration is facing a number of challenges: they cannot hire a lot of staff, officials are getting older, there are many tasks and they would hardly be able to do 10 different tasks from public procurement to the non-demographic services. So, in this sense as a region we did for public procurement, the solution. We have a central buying authority that do the frame of contracts for the municipality. You can have, four or five municipalities which are big in the region which they can be autonomous. Those, I don't know, with 50,000 inhabitants, they have a good number of officials. But all the others are small so they take part on this. So, the responsibility in complying with GPP is sent to the regional buying center. We work with them.

GM: Do you do the training on GPP?

NT: In the sense, that was the idea of the regional action plan. We don't do law and criteria drafting because it is national. With the regional action plan, we are boosting the implementation of the GPP. We do training for regional officials and also from municipalities. In the municipality we have the same problem as there are very few personnel, there are a lot of things to do. It is not easy to involve them in training. But with the crisis, with the emergency, we are improving these because we are doing training online thru webinars, and the officials don't need to move from their office so they don't lose their full working day. They just take a couple of hours for the webinar. But that's one of the objectives of our regional action plan, the one of training officials about the GPP.

GM: In your region, do you have a certain percentage of adoption, like how many municipalities have already applied the environmental criteria on procurement?

NT: Not yet. Now we are doing the electronic tenders. Last August, we implemented a tool to monitor the GPP application. We did not get the data yet because we wanted to wait a few months before adding the first result because obviously it is not useful to add the results after one month, two months.

GM: But generally, the adoption is really good, do you think?

NT: I'm not able to answer about numbers. I can tell you some threats, some problems that arose in municipalities. One is the danger of not being able to grant the contract, the difficulty to find an enterprise or a supplier that is compliant to the GPP. Many municipalities are worried about this because obviously they need to do the activity. If they're not able to grant the tender, they won't do that. In some cases, that can be bad. Another problem is being able to verify the compliance, so, being technically able to evaluate if the product is compliant or not. But then in many cases, it is not a real problem because as I'm saying, if there is a frame of contract by the regional buying authority, it is the regional buying authority that does the checking and they are very active in GPP. So the regional contracting authority, which is part of our group is really making a lot of efforts in applying these standards. As I'm saying, as each sector has a standard, it's compulsory to apply. So, the answer should be 100%. All the public administration should apply the standards.

GM: Yeah, just a matter of time, perhaps.

NT: Yes, it takes a little bit of time. There are also discussions about the problem of the standards, how are these defined. If you are an engineer, you can understand very well because obviously it depends on the standard. These can sound from my work, what is done by the government representative or companies is not easy to define a standard which is available for all the country, all the companies, all the market, all the situations. Once I spoke with a company, they are producing games for children, the ones that you put in the public parks. He said that certain kind of plastic that you need to be combined for GPP, you can only buy from one company in Spain. So, for them it's very hard because the supply chain is not always ready to comply to GPP.

GM: You mentioned about the working group, who is involved with it? Do you include the private sector? Do you have an organization of suppliers?

NT: No, the working group is strictly of regional officials. So there is my department, the regional contracting authority. We have this department in the region that manages buildings and all this stuff here. We also have the regional agency for environmental protection, a special department for health services, department of infrastructures. We have the agriculture department because in our region we have a lot of forests and production of wood. We have this PEFC, in English, it is a program for endorsement for certification and our region is the coordinator in Italy of this initiative. The inside of the council, the forest service, is part of our group. Because of these, we have a lot of companies which are linked to their production.

GM: That's quite a lot of people involved.

NT: We are planning, thanks to the GPP Stream project, also new entries, a couple of colleagues who are working on circular economy. We are trying to cluster on a number of initiatives together with GPP.

GM: By the way, can you tell me more about the GPP Stream and other projects your office is involved in?

NT: Yes, we are involved in different projects. I could say we are a lot active in GPP. So, we have this regional plan. We are part of another project, a LIFE project called prepAIR which is for the quality of air in the Po Valley. We work on some actions that are on GPP and we are also lead partner for the GPP Stream project, more information you can find on the websites. We are working with partners from five countries. I have to say it is a project that I am very happy to lead. My office has five different EU projects, so it's not the only one that I'm working with. But this one, I have to say, that all the partners are very involved, enthusiastic about the project and about the GPP. They are responsive, they participate with a lot of ideas. Thanks to this very interesting project, we should intervene in the ERDF regional operative program and boost the GPP application inside that program. Now, I have to say that with the emergency, we had a little bit of difficulty because Italy is the country that was affected earlier and we are going to face a very dangerous economic situation. So all the structural funds in this moment are being checked to see how they can intervene in this economic situation. We are now trying to draft an action plan that is not very easy because, as I'm saying, the situation is evolving fast. I can tell you two things that I think are interesting to your work. One of the possible actions that we would like to develop, thanks to the project, is the one of involving the managing authorities of structural funds inside our group in order to boost the GPP adoption. Thanks to their participation, that's a very important step inside the organization and in the commitment of one department of a managing authority to a certain policy, which was not the case until now. So I think it will be a very interesting step for our organization. The other one, we are planning to setup a coordination between companies, stakeholders and of companies by their representatives and the public administration. So it is a table where they can meet and talk together about GPP. This came out from the stakeholder meetings, they have private plans to develop this thing.

GM: Do you have a priority category in your region? For example, in a region in Spain, they will prioritize on waste management.

NT: It is just anything in the sense that as I said at the beginning, it is compulsory. So, you have to apply it. On the other end, one of the most active stakeholders represents companies that build furniture with wood. So, that's a sector which is quite important in our region. In this moment, they seem to be quite interesting. Obviously, if the private sector is active, it means they wish to comply with GPP. It is easier to boost the GPP in that process. On the other end, we are also developing a circular economy policy, so that will be linked to GPP management, for sure.

GM: You mentioned that you have a regional buying entity. Are they also responsible for the evaluation and certification of environmental criteria?

NT: Yes.

GM: That makes it easier for municipalities, indeed. Were there problems encountered? Are there enough suppliers?

NT: For me, it is not easy to give you a full answer. I know that in some cases, there were problems.

GM: I learned that there are instances in other countries where some procurement transactions encounter legal issues. In Italy, in your region, were there also cases like that?

NT: I think also in our region, we have some cases. But you have to begin to have them because obviously you have to think that the law was introduced in 2016. After that you needed the criteria to be adopted. So, I could say that the real application, the full application of GPP is the last two, three years. So, it is going to take some time, because they have to do with the lawyer and it takes time. After having a judgement, it takes time. As far as I know, we begin to have the first judgments. Also, I think we had one case where the company who arrived second, they made to court because they said that the first was not compliant. The judge gave reason to them, but also at the end they discovered also that they were not compliant.

GM: When you first started GPP, what were the mechanisms done to engage the organizations? How did the people react?

NT: Again, it's law so it's compulsory. So, they can't really "resist". The fears that I can recall, one is over in number, nobody participating from the public administration. For instance for structural funds, there are quite strict deadlines in the spending procedure of each structural fund. So, there is the need to spend a certain amount of money by a certain deadline, otherwise you lose the money. There is always the concern that by introducing new criteria you could possibly have delays in spending procedures. So these are two worries and the third one, I would say, the one of not being able to apply them. This comes mainly from the municipalities. These municipalities see these as possibly complicated, technical, and they fear of not being able to apply it. That's why I think that the regional contracting authority has the main role in application of GPP.

GM: You already mentioned earlier about the barriers for the procurers. How about for the suppliers?

NT: So we spoke with some of them. It is not very easy to get in touch with them. By the way, the feedback, one barrier is the fact that standards are defined at a national level. They say that the national association representative that goes to the table with environmental ministry, they don't always know very well what is the situation of the company. Because, obviously the Ministry of Environment calls the national association of producers, but the official that goes to the table is what they say, is very far from the ground. The danger here is they are not so aware

and also obviously the company is very big, have a lot of differences between the areas of the country. The second one is the fact that the public administration procurement, maybe, is not always the main market that they serve. So if they have to do big effort to comply to GPP and it is just a little share of the market, they prefer rather to lose the share. This is interesting because it matches with the fear of the procurers. What was said to us by the furniture association representative was that their main client is not the public administration. So if they have to change the production process to be able to participate in the tender, they prefer not to participate.

GM: That's a problem indeed. If they want to respond to a tender, do they also follow the normal long routine like in other countries?

NT: Yes, it is the same. It happens that there are some companies that specialize in answering to tenders. It depends also on the sector. For instance, the sector of cleaning in buildings, the public administration is a very important market because they have schools, hospitals, a lot of public buildings to be cleaned. What happens is that usually they are big companies which have office that is specialized in answering to the tenders. If you have a little producer, yes, it can be a problem answering to the tender. Yes, indeed. Bureaucracy could be a problem even for bureaucrats because all the tender procedure is becoming more and more complicated and more specialistic. On one side, it is true that now with the electronic market, it is becoming a little easier in the sense that it is faster and that you have checklists which can be applied. In this instance, it doesn't allow you to send a tender unless you have all the documents. That makes it easier because you don't receive any more tenders which lack some documents. But again, there are only some markets which are very interesting for the companies. For furniture, you have companies that begin to specialize for public administration.

GM: But what is the trend that you see now? Are there more companies trying to involve GPP in procurement in the public administration?

NT: I can see that there is interest. As I said, there was this request to have a table of confrontation between public and private. This is something that we are interested in, as working with the environment. But we are a little bit worried that the emergency could drive to less interest in environmental issue. So one danger now that we will face, this is my personal opinion, not the opinion of the region, is that, as there is this priority of financing, the private sector which is obviously a very big issue, one danger is that you just shift the environmental rules. So you just don't pay that much attention in the environment rule which will be in this moment, I don't know what the situation in Estonia, but apparently here the environment is going very well because the quality of the air is very good. It's very clean, because we are all close to home.

GM: So, in that regard, it seems to show that the culture is inclined to the environment.

NT: Yes. Well, obviously environmental issues are important.

GM: If you need to propose some changes in the environmental rules, how do you make this possible?

NT: The public procurement code is difficult because that's a national competence and it's not our ministries that are in charge of it. We have obviously the Minister of Environment who is in charge of the GPP. As in the region, our department is in charge of GPP. We don't have the regional contracting authority in other departments, but we are in charge of developing this policy and the Minister of Environment has a big role because they have the National Action Plan. They are also in charge of the national strategy for sustainable development and they are also the ones who do the standards. So, they decide which sectors, how, when. It is quite an important role. What we have is that we have a coordination table between the ministry and the regions. We meet on GPPs, we meet quite often. We had a meeting, I can tell you, just last week, not in Roma.

GM: Was it online?

NT: Online, yes. Usually we go to Rome. Now, we don't go anymore. So the ministry is working together with the regions and it's really a dialogue. They provide training to the regions, very specific. Together with them, we do the monitoring. So we monitor the situation and we send the outcome of the monitoring to the ministry. At the same time, the level of GPP application in the internal region is not the same. So there are some regions that are coming to the other table with some good examples, with some ideas, with some proposals. Also, the ministry is doing some actions that go beyond the GPP. Carbon footprint, life cycle costing, lifecycle assessment, which are not compulsory, but we are trying to see how they work. Social criteria is not GPP but is linked to that. So the ministry is quite active, and the regions are quite active too. I was the representative of the region to the table together with one colleague.

GM: So, the coordination is really good.

NT: I would say, yes. Also, not all the regions are that involved but there is a good number of regions which are involved. They do their regional action plans. We are not the only one, we are not the first one. We are very active because of the GPP Stream.

GM: We already discussed about the barriers. On the other hand, what do you think are the drivers that make you pursue GPP actively in your region?

NT: For the regulatory frameworks, that's national. I think that our regional action program is quite important because it gives a framework to the action and it commits many departments of the region. The fact of having this plan is quite important. Another important driver in our territory is the one of being able to involve also the municipalities, to reach them. So this, as I said, at the beginning, an interesting moment because everybody's at home. Actually, we had this webinar, it was very successful. We had 100 people following it with good level of attention. You know that when you go to webinar, you can check if somebody is really following or not. We have a very good rate of 80% which is very good. We already tried to do it earlier but was not very easy. Now, it's easier. Now we are thinking of organizing two workshops on standards, one on buildings and one on energy services. So, that's an important driver, one in disseminating training. And being able to do this link with companies and also with technical specialist, engineers, architects, the category of professionals which are really the ones who can technically guide.

GM: So you have consultants with technical expertise?

NT: In Italy we have for instance the "Ordini", the order of the engineers or of architects. In Italy, if you want to be an engineer, you will need to study in the university. They have to do a state exam that is done by the state and after, you have to be a member of the corporation. Corporation of engineers, architects, so you have different kinds of memberships. It means that you can sign projects, you are certificated engineer, and they do compulsory training to their members. So what we try to do is doing training on GPP to engineers, architects, and these people are the ones who are consultants. We have a lot of small and medium enterprises, it means that they need to hire consultants, because they need internal staff to do certain technical things. So it's important to also touch on those consultants.

GM: You mentioned the drivers and barriers already as well as how they are being addressed.

NT: Yeah we will see also what is the outcome of the monitoring to get a picture of the situation.

GM: Aside from the possible results of the monitoring, what impacts do you expect GPP will bring to the region?

NT: Okay, there are a couple of interesting concepts. One is that we should be able to go beyond the monitoring, because now what we will do, we will try to understand how many tenders use the GPP, how much money is spent on that. But then this is the big challenge. I don't know yet to which extent we will be able to do it. One is to understand what is the impact on environment. So, not only how much money do we spend, but what are the environmental benefits?

GM: And how to measure it?

NT: Yes. Which is not at all easy. We are just working with the idea that yes, there is an environmental benefit. But what benefit, what's the measure of this benefit? It's not always easy to define.

GM: Reduced carbon emission, perhaps?

NT: Yeah, that's a possibility. As I said, that is a pilot action from the Ministry so we are reasoning on that. That is something we should test on ourselves. First of all, we would like to do that on our buildings. Take one building, trying to understand what is the carbon footprint and if you do some changes, what is the benefit? The other thing that I wanted to say about GPP is that GPP is not just the rules that you have in the public procurement, in my opinion. It is a way of thinking. Buying green goes beyond the public procurement. The public administration has the political mission of boosting green public procurement, but that can be something to be extended to everybody, the companies. It needs to become a value. So working with GPP means also spreading this idea, making it institutional, making it a priority. And doing it in ourselves as an example for others. Are you saying it should be an individual thing? At the end, yes. The administration needs to do it because it's a public value. Maybe you buy the cheapest product, not the one that is environmentally good. Well, one thing that is in our action plan that I believe a lot in, is that we are also trying to do is to be an example as offices. We did the guideline on green behavior in the office. Just switching off the light which maybe, doesn't make that much impact on the environment but makes you as officially responsible for what you're doing. And for public official, it could be a change in mentality. We did that to boost that switch with very simple things, switching the light and waste disposal. We did it. We organized the waste separation in the offices which was not done before, and I can tell you also that it was not easy because we have many offices in all the region and each municipality has different rules for waste. But one issue has to do also with what is the impact. A little example that I wanted to tell you, what we did a couple of years ago, usually each official, each office, each room has its own printer. So we eliminated all the printers and we made one printer for each floor. So what it means, that to print, you have to leave completely from your PC and after you have to go to the printer, and with your badge you print. In our opinion, it drives to the fact that you will have less people printing things because just the fact that you have to stand up, going down there, maybe you'll find somebody who is already printing. So you have to wait for it to not just sit there and just click print. And if you don't go to the printer at the end of the day your printing job is eliminated. Plus, as this is done on the regional network, we can monitor how many prints. So that was a big change. But the fact is that we don't have data about the previous situation. So we guess because obviously each one has its own printer on each desk. And we didn't know how many. It was not monitored. So we don't know how many we really had savings. We guess, but we are not sure. But that's why I'm saying that the environmental impact is not always measurable. It's not easy because we did this. We are convinced of the fact that we reduced the number of printings. I believe also about me, because printing going there, coming back printing again. Unless I am training for a marathon.

GM: So are you using your own toolkits or are you using the ones from the commission?

NT: For the guidelines?

GM: Yes.

NT: No, we have our own.

GM: Do you think the European Commission should make GPP mandatory in all its member states?

NT: It's not easy because we have this compulsory. The objective is already achieved. So is it not easy for me to answer about something that was already achieved.

GM: You are part of the GPP Stream project which is part of the program financed by the European Commission. Are there recommendations that you want them to look into more?

NT: Well, yes, I can say that GPP Stream was financed. That I think was one way to boost GPP. We have two partners that we're working on the national action plan. We have France and Romania. It is quite an important project, I think, to reach these objectives. The committee is also doing a lot of initiatives, circular economy. What I think should be taken more into account, at least for us, is in the structural funds. Because that's a sector where maybe the commission could do something more.

GM: So, you mentioned about circular procurement. Is this the direction where the region is going?

NT: What we are trying to do in the region is trying to coordinate everything under the regional strategy for sustainable development. So peer economy and circular economy, GPP, all these initiatives should go under the umbrella of the sustainable development. One thing that I can see is that GPP often is seen as the article 24 of the public procurement code. No, it's not just that. It is an approach rather than a law.

GM: Approach to sustainable development?

NT: Yes, sustainable development applied to the public administration but carbon footprint measurements, lifecycle assessment, even circular economy are all part of it. Yes.

GM: Are there further recommendations, insights you want to share about GPP?

NT: What I can say is, I think it's important, this foundation between member states, between organization. I found colleagues who are very involved in this approach. And I think that's something that is very fruitful. So this European dimension, is something that is able to be a driver also. There are people in other countries and you find out that are facing the same, maybe they're finding interesting solutions. And, the government is going to the practical. Standards, standards, standards. Define them, verify them comply to them. That's the bigger challenge. You have to find a common standard for all the companies. You have to evaluate, companies have to comply. The big challenge is to find this "equilibrium".

M Interviewee NL Transcript

Interviewee : Milan Bijl
 Organization : PIANOo Dutch Public Procurement Expertise Centre
 Position : Consultant Sustainable Public Procurement
 Country : Netherlands
 Date & time : April 21, 2020, 12:00PM
 Duration : 45 mins
 Channel used : Skype
 Interviewer : Graciela Mante

GM: Can you please tell me about your organization and your role in it?

MB: Okay, so, I am a consultant on sustainable public procurement which means that I help the national and local governments with how they can apply sustainability in their tenders in public procurement. That can vary from applying very basic criteria to doing extensive, very complex types of award systems to get the most circular desk chair or whatever, like some very complex stuff as well. We don't help individual organizations, we're more of a networking and knowledge sharing organization. So we don't do the actual tenders, but we say, look, this is what other people did, maybe you could apply the same. Then we tell them good luck because we work for all the governments so we shouldn't be biased and too much involved with specific tenders.

GM: You are a non-government organization?

MB: No, we are a governmental organization. So we are part of the Ministry of Economic Affairs. But we offer services for every procuring organization in the Netherlands.

GM: I saw on your website that you're using SPP. But did you start with GPP or was it SPP all along?

MB: No. I would say, CSR, as a term in general, is broader than just environmental aspects. And also if you look at triple bottom line, it's people, planet and profit. So that's the basis for our sustainable public procurement initiative. But I think that the green side of things is easier. It's more tangible. You can tell when you reduce new materials in concrete or something or when you have recycled paper instead of a virgin paper. So, it's very tangible. It's also politically more desirable because you can say, well, we have this whole new chairs and desks and stuff, and they're all made out of reclaimed materials. Very concrete and tangible aspects. Whereas, if you say, well, this time our shirts are maybe not produced with child labor or slavery. It's a lot less, probably appealing. Also, the social aspect mostly happens further down the supply chain. So, it's a lot more difficult to assess and to have impact there as well, because, we are just a small piece of the whole supply chain that buys something. So it's more complex and less appealing, I guess. The start is, it has been for both aspects of sustainability.

GM: When did the government of the Netherlands decide that they should implement the Sustainable Public Procurement?

MB: I think in 2008, somewhere around that time. We had the first sort of manifesto or agreement on Sustainable Public Procurement where we said we are going to buy sustainably for 100%. Everything that we buy will be sustainable. But you can only do that if you have something to measure on what sustainability is. So they developed criteria and they said, if we apply these criteria, then it will be sustainable.

GM: Was it a national initiative or was it out of compliance from the European Commission's directive?

MB: I have to be honest, I was still in school by that time. I think it was a national initiative because we are mostly slightly ahead of what is adopted in the EU. So my gut feeling would be that it was a national issue.

GM: Do you have a national action plan or a similar framework?

MB: So at that point, they developed these criteria, and it was mandatory for the national government to apply. But local governments mostly also adopted this policy that they would apply these criteria for their public procurement. Basically, they thought that will be it, then we just update the criteria every year and then we will update applying sustainability. But it doesn't really work like that in practice. So there are some national initiatives where it's mostly focused on networking and getting people to commit to procuring sustainably but I don't think there is such a thing as an actual national action plan on sustainable policy. There is at the moment, actually this year, the government presented a new strategy on sustainable public procurement but that only applies to the national government. So, the national government cannot enforce sustainable public procurement on local governments.

GM: So, it's mandatory in the national level.

MB: Yeah, but it's policy.

GM: So it depends if the local government wants to implement it.

MB: Yeah. You can imagine if you have a local far right government that doesn't really care about any sustainability or anything, then the organization that is part of the Netherlands will not put any effort into sustainable public procurement. If the politics doesn't care about it, then it won't happen.

GM: So for now, what's the current status of SPP implementation in your country?

MB: I think it's important to note that there are some overarching policy objectives. So, we want to have a circular economy in 2050. We want to have 90% of businesses apply the OECD guidelines by 2023 already, I think. So, in a few years. And then you have all these overarching policies, objectives, like the SDGs, like human rights, the UN GPs, there's loads of other international policy objectives, ILO standards, all these types of things. Those all influenced the way that we buy stuff. So I think the objective is not sustainable public procurement. SPP is a means to get to the objective of a circular economy. So, that's the way we should look at it. And so implementation really depends on capacity and knowledge and ambition for local governments. The national government itself publishes a yearly report where they look at how many times they applied certain criteria or if they put in award criteria or applied due diligence to risk categories for social rights and stuff. But I think if you look at those numbers, you still see we're not doing fantastic or anything.

GM: But do you think it's more than 50%?

MB: I'm not too sure. I would have to look it up. I really can't say actually at the moment. Also, it really depends on how you define it. I know that there are some, like the region of Amsterdam has a new framework for measuring circularity. And they just say if you do a market consultancy on circular options for this tender, then you're doing circular for 10%. But what does that mean? You don't have anything yet. You just asked a couple of questions like, could you maybe think about doing a more circular product? If the answer was no, you still get the 10%. So the definition and the measuring of sustainability is very important. So we look mostly at how many times were criteria applied and was it just like basic criteria, or also award criteria.

GM: Maybe you can give me a website, where I could check it?

MB: Okay, so this is where you'll find the yearly report of how the national government performed. In chapter four, it says something about public procurement.

GM: Okay, I'll check it later. About the SPP ecosystem, which organizations are involved?

MB: The National Government gives me and the team that I work for, the assignment to spread awareness and knowledge and create a network around Sustainable Public Procurement. So there are different initiatives that try to get commitment from other organizations to do more with this topic. So the national government and then us as an organization that's responsible for SPP, and then we create networks where different governmental organizations can join, and we, for example, develop strategies. We make sure there's enough interaction with markets and stuff so we know what the level of sustainability is that we can achieve. Then we make sure that they apply that in their tenders. So, it's national government, it's local governments, it's NGOs as well. It's organizations that represent the businesses, the business sides. So it's really about networking and involving every stakeholder basically. If it's necessary to involve NGOs, because we want to know more about the supply chain and involve NGOs.

GM: Do you involve the suppliers with criteria development? Do you consult with them?

MB: Depends. You can. So, when you publish a tender beforehand, you can consult the market. You can organize an event where you just publicly announce that you're going to have this event and you invite interested companies to come by and then share all this information, share your vision, share what you want to do with this project. Then they can give you feedback. Most of the time, you'll notice that when there are different companies, they won't all tell you what they can do to the fullest extent because they don't want to give away their competitive advantage, but they'll give you some information and then you can apply that information in your tender. That's your knowledge that you can use for the level of sustainability that you can achieve. And then when you publish your tender there is always this moment where the companies that are interested can ask questions and you answer these questions. One or two rounds and then they hand in their final offer. So in that stage as well, the companies can ask, you're asking for, I don't know, diesel engines, but why won't you ask for electrical engines because the market, we are fully capable of delivering electrical cars instead of diesel cars. At that point, you can still alter or change your tender. So those are the moments where you can interact with companies.

GM: Do you have cases when, for example, the company didn't win, and then they will file cases against you in court?

MB: Yeah, they can. Yeah, absolutely. I think as long as you're clear and transparent what your objective is, then most of the time it is fine.

GM: So there are many categories for SPP in your country. Which ones are mostly implemented? Maybe you have a different system for it compared to other countries?

MB: Yeah. Different system. So, the national government is organized in different categories and for these different categories, we have different lead buyers. So one person would buy all of the catering for the whole national government and we sort of organise it in the criteria for them. We organised in the website that I just sent you. And if you look at those criteria in any examples of criteria, you can see that there are some demands, some award criteria and some really new sustainable development criteria as well. So they are indicated by the leaves that are next to criteria if you look at them later.

GM: Does the government prioritise some categories?

MB: Yeah. So, the government has different procurement categories where there's one person responsible for the whole government, and they all have their individual ambitions, sort of assignments to achieve. For example, circular economy in 2050 or reduce child labor in supply chains.

GM: So it depends on their goal.

MB: Yeah, exactly. So, for example, in the catering category, so the person that buys all the food and catering for the whole national government, there they focus mostly on circular economy for their food supply chains. So reduction of waste and CO2 reduction and also, what can we do with the produce afterwards? But also they obviously have supply chains like coffee, oil, things like that. So they have to focus on the social aspect as well. Same goes for textiles and garments.

GM: Yeah, so, every category, different environmental criteria.

MB: Yeah, but all based on the overarching policies.

GM: Some countries have certification organizations for ecolabels, do you also have the same or is your office doing it?

MB: No. There is an organization that I know that looks at certifications that you might have and then they evaluate them and says, okay, maybe you can take this next step. But they are not employed by the government. There's just a business that does that.

GM: So a third party.

MB: Yeah. So we mostly say that if you want someone to have a certain certification for your tender, then you would also have to accept similar certification or evidence even without the certification. So it's not allowed for me to say you need to have a Fairtrade, your coffee needs to be Fairtrade, because I would also have to accept other certificates even though for example, fair trade, and other coffee labels are very different in content.

GM: So it's the procurer who will check the criteria still?

MB: Yeah, mostly. I would say if you would like someone to have Fairtrade coffee then look at the criteria for Fairtrade coffee and apply those. Don't say you need to have Fairtrade, say you need to have fair working conditions and that all this type of stuff. Because if you say Fairtrade coffee, anyone who does the same but doesn't have the label is excluded even though they might even be doing better.

GM: It will be against the competition law then.

MB: Exactly. Yeah, that's the whole point. We actually have a court ruling on that as well.

GM: How did the transition to SPP go?

MB: I think what's interesting is also to view it in the context of the state of the world, in the economy. So in 2008, we started with sustainable procurement criteria. But at that time, there was a global recession and economic crisis, so, the most important thing became finances. So, people for some reason have the perception that sustainable means more expensive. It doesn't have to be. Now it can also mean just as expensive with longer life or a bit more expensive and a lot longer life. So, there's a misconception there. Then you have a procurer, the person that does the tenders, which is naturally risk-averse. So they tend to have as little risk as possible because they don't want to get a lawsuit. But when you apply SPP, then you get more and more, you go into the gray area where one circular solution is better than the other. So how are you going to weigh those and

evaluate them? So you need to have knowledge about the products and stuff as well. Not just knowledge about the process, but also the content of the thing that you're buying. So that requires a lot of cooperation in an organization. And it's not straightforward anymore. It becomes a lot more complex and a lot more of an organizational question rather than a procurement question. So, in that context, I've noticed also the demographic of the procurers, the people that write the tenders. They are mostly not the young people that are ambitious about the environment. They are a bit older and doing this for many years and they just like the way their job is, they don't really want to change. And so there's a lot of things influencing the adoption of sustainable public procurement. What mostly works very well is if you have someone that is ambitious, that knows how to talk to the project managers, the people that have the money, the budget holders, the policymakers and then incorporate everyone together in these projects.

GM: The one doing the networking.

MB: Yeah, exactly. Because if you start with a discussion on sustainability, once you are already in the process of almost publishing the tender and you're way too late, you need to get the budget holders, the project managers on board. They have to say, we want to have circular solution for this, this thing that we need.

GM: So, that time, what was done was more on awareness?

MB: Yeah, exactly. It's on awareness and basic training on how to apply these criteria and how they will be evaluated. At the end of 2016, we had a new initiative called the manifesto on sustainable public procurement where basically organizations said, when we signed this document, we are going to make an action plan for our organization, where we are going to look at our priorities, our policy objectives, and based on that, we are going to look for a number of tenders where we can apply these principles.

GM: And most local governments supported that?

MB: 160 of the 355 local councils. So one third.

GM: But it is growing now, I suppose.

MB: Yeah, still growing. And some organizations say, we don't need to join this initiative from the national government, because we're already doing a lot. So, let's say around one third of the governmental organizations are applying this in some way.

GM: So what do you think would make those two thirds adopt more, be more open to the possibility of having SPP in their governments?

MB: Well, nobody can be against sustainability. But I think the problem is that there is no ownership at the project management level. So, they are not held responsible for CO2 reduction. But if we think back to the basics of sustainability- people, planet, profit, then those three aspects need to be incorporated in your performance as a manager or as a director or as whatever. Mostly people only get accountable for their budget so we cannot go over the budget because then something will happen.

GM: Is there a policy supporting an increase in the budget when it comes to SPP?

MB: Not in the national policy. It really depends on the organization. But I think if someone that is responsible for making sure there are new roads and stuff is also responsible for CO2 reduction, then he would have to ask their procurement officer, like, how can I do this? How can I make sure that the stuff that we buy is the most CO2 reduction stuff available? So that is the problem.

GM: So, are you saying that it depends on the leadership, if they are environmentally conscious?

MB: Yeah, maybe. Leadership, but more accountability. So leadership is soft and accountability is hard. Just like the budgets. Yeah, you have 2 million, how are you going to spend it to make sure you reach all your objectives? Same would go for CO₂, you have a budget of so many kilograms of CO₂ per year, stay within that to be on track or you have an assignment to reduce by X percent by this year. How are you going to do it? So I think accountability is key.

GM: So you are at the level now where the policies and frameworks are in place. It's just a matter of acceptance.

MB: I think there are plenty of policies and support. I think it's mostly an organizational and cultural question at the moment to achieve more sustainability. Anyone can apply the criteria. That's not difficult. But really, organizational change. So you create a sustainable organization that takes its leadership, but the way to get there is, I think the way to really enforce it, to get the people that don't really care about it on board, is to have them accountable.

GM: We talked about the drivers already and you also mentioned about some barriers. Do you have anything to add on the barriers?

MB: I think barriers are cultural, organization culture. And, again, no accountability for CO₂ reduction or for circularity, because I understand that it's still very difficult and abstract and a definition of circularity is also very, very complex. But every step is one, so we have to keep moving forward. So we have to keep trying and get the best solution.

GM: How about for the supplier side? What do you think are the barriers for them?

MB: I think they need to know what we want. So, if you have two local governments, two small towns next to each other, you shouldn't have ambition here and another here. They should be sort of similar. That's why there's this program circular economy 2050 where, if you're a small organization, you can just simply adopt some of those areas and say, well, we're trying to follow this program. So, the supply side knows sort of what to expect. Also the engagement like we spoke about earlier, have consultations, have discussions with the market and try to keep your knowledge up to date.

GM: Do you also offer financial resources to the suppliers?

MB: No. You could. We don't do it. But it's definitely possible. There's plenty of tender options where you can decide to cooperate based on a vision and then develop a product as you go along. It's called the innovation partnership, I think. Sure, as possible. Anything's possible. Basically, the rules are, there's plenty of room to experiment and to try new things and to be creative. It's just that people need to not be so afraid of the rules and look for the room and flexibility.

GM: How are these barriers addressed? You mentioned about networking earlier.

MB: Yeah, I think the time for just networking for networking's sake has passed. We are now in the stage where when we talk about these topics, we also want to impart more knowledge and make sure it comes down to something tangible. So, we are gathering groups of 20, 30 organizations that all want to buy new clothing, garments for the organization, and we get all the information from the market and from other areas. And then based on that information, they will form a market strategy which they will all use in their tenders.

GM: So it's like a common environmental criteria?

MB: It's not just criteria. It's yeah, it's award criteria. So, it's different things. It's more of a strategy, a long term perception of how the market will develop and how we can get the best out of the market. It's called, the concept, the Buyers Group. And it's been applied in Sweden as well. And we are starting that now as well. But you probably find more about that on our website.

GM: Okay, I will look into it. So, how do you measure the impact of SPP?

MB: We have this system called, literally translated, SPP self-evaluation tool, where you have all your data from your tenders, automatically loaded into it and you can then add where you applied criteria or whatever to the tender so you can have an overview of how you are doing. Also this data is used anonymously to report on the state of SPP in the Netherlands as a whole. But, that's still early. It's still the first year that we're trying to do so. So I can't really say anything about the percentage.

GM: Is carbon emission included or not yet?

MB: Not yet. There is an additional tool I think for your cars and stuff. Say, a local council have, like 20 cars or something, you can add those. There's a different European directive, the Energy Efficiency Directive, EED that mandates that you need to have some form of insight into your CO2 emissions if you're a larger organization. So, that ensures that you do know your CO2 emissions for your cars, thus, make a reduction plan.

GM: You already mentioned about the direction of SPP, that you have the circular economy program in 2050. But, do you think it should be mandatory?

MB: To be honest, it's irrelevant whether or not I think it should be mandatory because there is no way to make it mandatory. As you know, in the state law, it's not possible for us to mandate to local governments to apply it. But I think, that by creating a network and building this coalition, then that will become mandatory and normal. So that transition is happening. Absolutely.

GM: Did you develop your own toolkits for SPP?

MB: Yeah.

GM: Do you want to share other insights about SPP?

MB: I would say, look at Sweden, Denmark, Norway and the Netherlands and then try to find how they can complement each other. That would be sort of like a best practice of the four nations that are farthest ahead and then see what works for them. And that will be very interesting to see the comparison between the four because I know that in the Nordics, they're far more focused on the human side, the social side. For me that is very interesting. They view it a lot more like CSR in general.

GM: Is it a cultural thing also?

MB: Yeah. We tend to focus more on the green side of things.

N Interviewee SME Transcript

Interviewee : Gerhard Huemer

Organization : SMEUnited
 Position : Economic Policy Director
 Country : Belgium
 Date & time : April 9, 2020, 3.30PM
 Duration : 30 mins
 Channel used : Skype
 Interviewer : Graciela Mante

GM: Can you please tell me about yourself and your organization?

GH: Interesting is, I am an economist from Austria and I have worked over 21 years in Brussels for the European SME Association- SMEUnited. Before, the association was called UEAPME, we changed our name only two years ago to SMEUnited. Our organization is a European umbrella organization of national SME and craft associations. It means our members are not SMEs, our members are national organizations which have founded us to have a strong arm in Europe to lobby the European Parliament. We lobbied the European Commission, contact our stakeholders et cetera. So, our job is to represent SMEs towards European institutions and other European organizations. It also means that we are not doing any services for SMEs because this is a task of our members. We have not been directly related to SMEs so our clients are national organizations. So it's the first thing. The second thing is what we are doing here is giving policy work. Maybe I will not be able to answer a lot of your questions because I cannot speak on behalf of an SME. I can only explain to you what we are doing in Brussels related to the topic. I am responsible in the organization as the Secretariat for public procurement and that's the reason why I replied to your request. And I was dealing with the public procurement directive in 2012, 11 to 13. And also with those before and the first public procurement I was negotiating was in 2001. So the green public procurement was always part of the agenda and was always somehow on the table.

GM: When was GPP introduced in the organization?

GH: In practice, we never introduced GPP, because we are not doing procurement. What we are doing is discussing with the Parliament, the European Commission, how they should design the public procurement directives into rules to make green public procurement possible. But also we do it in a neutral way because some of our members are afraid that green public procurement also may be used to give advantages to certain companies, and therefore, we have to tell our SMEs to do green procurement but not misuse it for other political purposes. That's our idea. Our general approach to this topic is to say, whenever a public agency we choose does procurement would like to buy something which is more green, they should be able to do risk. But they should not discriminate companies because they are not greening such. This is a little bit our philosophy. We are not performing green public procurement. Many of our members apply for green public procurement course, because they are able to deliver it. Others are behind and are not able to fulfill legal requirements of green public procurement in any case. But it is the decision of the procurement agencies of the government, the municipality if the procurement is green or not green. It is not our business to tell them what they should buy.

GM: I saw that your organization is part of the focus group in the European Commission. So, are you also involved with setting up policies for the environmental criteria, the ecolabels, life cycle management, and things like that?

GH: In some areas, which are pretty important to us. We don't have enough resources to be involved to all these topics. It is especially important for us, for example, related to production areas where SMEs are more active than others in relation to green quality standards in service provision, et cetera. We are trying to be involved. But they are not done by our procurement people, they are done by our environment people. What we are doing is that we are involved in the rule setting at European level. It means we are involved in the setting of the public procurement directive, which provides the frame, how someone can do green public procurement

and we are to a certain extent involved in the setting of the standards, designing what is green, what is not green. It is quite green labelling, et cetera. This is the way we proceed. I am doing the first part, I am involved in a commission in the Parliament when it comes to the question how you can ensure that you get the right product, is the procurement agency to insist on green products and green services without infringing fair competition between companies.

GM: How do you deal with standards? Who sets them?

GH: Nobody of us can have an overview about only standards. So, if we enforce in setting the standards for let's say, for basically whatever it is, we're trying to get to find an expert from the sector who is knowledgeable, to represent our interests in this working group dealing with these standards. Same with what we have now with the taxonomy and finance. We need for each area experts who will be able to tell these people what's easy, what is not feasible. Because especially for SMEs they have the problem that of course, large enterprises try to push up standards, also to kick a small competitor out of the market. Because if you define the standard which can only be fulfilled by big companies, especially whereas costly certification procedures, very costly testing procedures, high laboratory costs, then you will be easily able to get rid of all these smaller competitors.

GM: Okay, so you're in the middle, like, you're making sure that everything is not discriminatory.

GH: The main discussion we have since the beginning on green public procurement, there are a lot of environment associations who are NGOs which say the public procurer should have the right to keep all companies out of a tender, which are not certificated. They always do the best green production processes possible. We say no, this is wrong. if a small company is able to fulfill it at the area for this specific contract, for this product and for this service now demanded and should be able to participate in parallel, other things, which are not at the same level of environment standard, but of course, fully, sticks to the law, existing law. If you have problems with waste regulations, et cetera, then you can be kicked out. But if you behave legally, you should not be excluded from a tender as long as you are able to fulfill these concrete standards for requirements for this tender and this is a bit of in discussion in 2001, 2007, 2011 with environmentalists, and to enforce more then what is justified, from our point of view. So, if a company behaves legally, if the product or the service under discussion fulfills what the procurer is aiming for.

GM: Were there complaints about it?

GH: There are complaints because there was a worse policy debate when the parliament discussed the directive. The commission was fully at our side, the commission absolutely has the same opinion on this topic. This was difficult because the parliament wanted to have more, but in the political process they didn't win. It's old. But if there are complaints now, because of some, one of the agencies is not following the rules, then you have the remedy procedures into play in public procurement, where an SME can go to call and say this is not okay based of a ruling which is not in conformance with European law.

GM: You mentioned already about some of the challenges of SMEs. What do you think have been the most challenging factors for them based on the associations that represent them?

GH: In the world greening process, you have to differentiate between those few, not enough SMEs which are frontliners in environmental production, in circular economy, et cetera, which are highly innovative and which are the trendsetter in some areas and a big bite of SMEs which are more or less a little bit more commercial, more traditional companies which have difficulties to catch up with this process. It is the same for the green deal, this is for green procurement, this is the same for adopting to circular economy, et cetera. For these SMEs, they have not enough knowledge in the company, they don't find the right experts, the right qualified personnel, they

have difficulties to get financed, to finance the investments, they have difficulties to get access to the knowledge needed, the attendees license, et cetera. In addition, you have all these very complicated, very expensive administrative procedures like certification and testing, et cetera. Reporting directive, for example, which makes it very hard for SMEs to catch up and to develop in this direction. Therefore, what we are trying to do is to mobilize European programs and money helping SMEs in this process with money, with advice, financial advice and also training possibilities.

GM: Do you think the Green Deal would change how SMEs would adopt to GPP needs?

GH: Climate-neutral economy in 2050 and of course also public procurer has to play their part and should focus more on green products. And here it comes another problem into play because if you imagine a small city, Tallinn maybe, Tartu. I have been in Tartu, too. It's procuring a new set up for the laboratory of the universities. They get a budget for this and then you have a civil servant who is surrounded to book the process. If he's buying the most traditional product on the market to the lowest price, is fine and he will not get any problems. If he goes for green procurement and want to increase the environment level, life cycle calculations and other thing, you can be sure that there will be a company which offers the traditional cheap product. If we go to court, or go to the media and we complain that this municipality of Tartu has not bought the cheapest product and wasting taxpayers' money, et cetera, so, you mean if you want to progress through this you need to have a political understanding, a political will from the top and also a positive willingness of these people to explain to the public, why it is better to buy something if it's more expensive in the first run, because the last costs may be cheaper, et cetera.

GM: That seems to be a common challenge for the public sector.

GH: Yeah, same problem with social procurement, same problem as innovative procurement. There is always additional risk compared to the easy way in buying the cheapest product of the market.

GM: What's your opinion on why the EU target of 50% on GPP implementation has not been reached?

GH: The European Commission has no instruments to force them. It must be the critical decision of the national governments and also they got to provide incentives to do this, otherwise it won't happen.

GM: What do you think still needs to be done by the European Commission concerning this?

GH: As I said before, the commission tries to motivate member states to do something, but there is no more that can be done. They cannot finance the higher costs of green procurement, they have not enough money, and they have no legal instruments to force them to do it. One of the many areas that the European Commission even to the outside world can rationally do, they go in the right direction, they do something. And then what they do in reality, they created a working group where they discuss a little bit of what happens, but they aren't able to deliver because they have no competence for it.

GM: Do you think that more SMEs will go in the direction of GPP in the future?

GH: I think this is an open question because the procurers, the agencies, the municipalities, has to go in this direction. The SMEs apply for contracts; they don't care if it is GPP or not.

GM: So it depends on the demand.

GH: Exactly. SMEs are eager to get contracts. And if they are able to fulfill the conditions, then they will apply. But if they can do it, then they will do it. And if there's more demand, then, therefore SMEs can go in the market. But we cannot force the procurer to ask for green criteria. It is their choice.

GM: Are there dialogues between a municipality or a city and the SMEs concerning details on the criteria?

GH: Officially it is forbidden. Then it will affect with the competition. But it happens, it happens. The most important thing for us is that they prove for fulfilling the criteria. The procurer should make it as simple as possible. If you have to bring in certificates which cost the demands of your company, then they will not be interested. Yeah, you have to adopt. If you want to have SMEs in this market, you have SMEs applying for such tenders, then you have to keep it so easy that an SME can perform it, this costs disappear. Otherwise we say, forget it.

GM: What other issues do you think needs to be resolved for SMEs to go forward with GPP?

GH: Most problem we have is this lifecycle cost calculation. So, we asked them to select the best possible offer lifecycle costs. If you want to do this, you have to make it as simple as possible in the technical specifications of a tender that an SME also can provide the necessary information. Because this is the main problem I hear from our members that say, this lifecycle cost calculations are so complicated that we are not able to apply to such tenders. You have a chance of 5% to win the tender. Then it becomes very expensive.

GM: So do you have any recommendations for GPP policies?

GH: This is not our policy. We are not pushing for green public procurement. We are pushing for general procurement. Our SMEs want to have easy access to this green public procurement market. The requirements is to be as simple as possible. Again as I said before, this is the decision on the municipality overreaching of a member state. But it's not our decision.

GM: As you mentioned earlier, you react to the demand. But, do you think greening the procurement is really important?

GH: But this is not the task of the SMEs. Yeah. we come in a lot of situations.

GM: So are you saying that if the regulations are okay, it's not complicated, more and more SMEs will probably want to join GPP?

GH: Exactly.

O Interviewee SP Transcript

Interviewee : Víctor Rey Calatayud
 Organization : MANRA (Mancomunitat de la Ribera Alta)
 Position : Communication Technician
 Country : Spain
 Date & time : April 17, 2020, 10:00AM
 Duration : 37 mins
 Channel used : Skype
 Interviewer : Graciela Mante

GM: Can you please tell me about your organization and your role in it?

VRC: My name is Victor Rey. I work as a Communication Technician in Mancomunitat de la Ribera Alta in Spain. It is an association of 37 municipalities in the south of the area of Valencia that have some services and together we call it Mancomunitat services. In our region, there is a national government and a regional government, in Valencia. Among the regional government and the municipalities, there's an option to create some associations like MANRA, where different municipalities, smaller regions, comunidad and another name in English. So there are 40 municipalities that are participating among them in different projects. So this is not exactly a government, it has more or less the consideration of a big local administration.

GM: It's like an organization?

VRC: Yes, in fact we call it a local administration, not exactly the same level as a municipality but it is bigger, but more or less they have the same consideration.

GM: I saw the name of MANRA, your organization as part of the Interreg Europe GPP-Stream Project. Can you tell me more about the project?

VRC: We participate in different projects, among them is Interreg GPP-Stream. The Ribera Alta is a partner of the GPP-Stream Project 2018 - 2022. The first phase will end 31 May, with the draft of the Action Plan written by each partner. MANRA will help to include green criteria in public procurement in the region through a pilot case focused in sorted waste management. There is a lack of knowledge in public servants about the benefits of green criteria. The importance of the project is showing the importance of GPP in economic efficiency and how important is the monitoring process in this project. So there is a team there. I am part of that team managing participation in that project with another seven partners of different countries like Spain, France, Italy, Bulgaria, Romania.

GM: Who is responsible in green initiatives in your region?

VRC: In MANRA Association, there is a Department of Energy and another, Department of Environment. There are different projects of awareness and also of course in energy saving. So we participate since two years ago in the GPP-Stream project and recently I am working there since one year ago. So, when I come here, the project already started. It's close to the end of the first and we have to end with an action plan. MANRA Association takes part in different waste management projects, because the smaller municipalities cannot manage it by themselves. So in the organization, they start to investigate a little bit about how to manage that services, and other one that has relation with public programming. They discovered there were other countries like France or Italy that were more developed, including green criteria. So we decided to take part in this project to learn a lot, and be able to transfer that information to a higher level.

GM: What is the current status of Green Public Procurement adoption in the Ribera Alta Region? To what extent has it been implemented? Do you have a National Action Plan or a similar policy?

VRC: GPP is not very developed in our country. There isn't a strategic plan. Everything, it's already to do. In the legal frame, there's no big obligation to include GPP in Spain. There is only I think, a requirement of having at least one green criteria or one social criteria in public procurement. The participation in the GPP-Stream process has helped the Ribera Alta to increase the knowledge about GPP, categories of green criteria, problems to be solved and the process to implement GPP. We are now developing the strategic document -Action Plan.

GM: So, just one is needed?

VRC: Yes. Just one, it can be green criteria or social criteria. This one we found in the legal frame. So, there is still a lot to do. Something we included in the Action Plan, we are now elaborating that we have to change the mind of policymakers and technicians, that green criteria is not more expensive and has to be considering the lifecycle of goods and services, and see that green criteria in a long term could save money. So the point of where we are right now is starting the actual plan and the next step will be a campaign of informational workshop, capacitation of the people that will start to include green criteria and change people's mind.

GM: Did you set targets? What is the percentage of GPP with regards to GDP and the public procurement expenses?

VRC: Not still available. 10% is a desirable goal. We want to aim and we are trying to work to get that rate.

GM: Which organizations are involved in the implementation of GPP?

VRC: In our territory, we are trying to implement GPP, we are trying to promote, to motivate municipalities to include green criteria. For stakeholders, we have some meetings, a very important one with the Regional Director of Minister of Environment here in Valencia. Valencia is a region with 5 million people in Spain, so the people who are in charge of environment management in addition to minister, we have some meeting with them to take part of the green procurement criteria, to transfer the things we are discovering in the project. Another stakeholder we are in contact with, there's the same role in the European funds here in the regional government in Valencia, the 56 municipalities in our region and the chamber of commerce here in the biggest city which name is Alveda. They're also stakeholders because some of them will be the companies, the bidders in the public procurement processes. Another stakeholder is Environmental Center of Education here in Valencia, that is also regional government.

GM: Is that an academe where you source your experts?

VRC: No. We don't have universities among the stakeholders in that project. We don't get to that point. In the municipalities, there are some technicians that are involved in the public procurement because they are the ones who write the processes, decrees and so on. They are experts in that. Some of them are architects, others are technicians in the environment. They have more than 20 years of experience so they're experts in that kind of processes. The green criteria is something new for them. They know that there are some categories where green criteria can be included- furniture, and building, waste management and so on. How to do that as a requirement, as an award, also how to change the market to include a product, those are the problems we are finding.

GM: For now, are you the one coordinating all the stakeholders or is there a council doing it?

VRC: Not exactly. There is a team, and I am a member of it. I am more into communication, I am helping with the language for the region of MANRA. There will be a committee leading the actions.

GM: What is the level of engagement of the private sector? Are they very active also?

VRC: Not yet. Right now is the lowest stage. We still have to work with awareness among companies to show the good practices of another country, to see the benefits of that and also to make it compulsory to adopt to green criteria, to access to the public procurement. We are still in the first attempt. We still have to reach them.

GM: You mentioned that you're still in your initial phase on GPP implementation. For now, you're prioritising waste management?

VRC: Yes, project of sorted waste management. We are going to start door to door in some small municipalities, down the center of the cities that is difficult to do in a different way. So we try to manage to improve sorted waste management from the region.

GM: Were you able to come up with the criteria at this stage already?

VRC: We included some green criteria in those kind processes. But the next step will be the capacitation of the technicians.

GM: Can you give me just a little bit about the environmental criteria included?

VRC: For example, the vehicle they are using for the waste management. In monitoring, we are also including some IT systems to monitor if that sort of waste management is gone or not. Also the criteria would be the material of the box used for waste management.

GM: For now, the ones formulating these criteria are just the technicians. You have not involved the business sector yet?

VRC: Not yet. It's the core group from the municipalities. The public administration is the one who are leading that switch from non-green criteria to green criteria.

GM: How do you evaluate the environmental criteria in the tenders?

VRC: We are learning to do that. And thanks to the program, the GPP-Stream, we are having some tools, some toolkits, guidelines, how to monitor, how it is implemented. There are some Excel sheets. We'll compare that with some algorithm, an index to see the first position and the final one and compare them in the amount of CO2 saved. If the price of the car, electrical, hybrid or not, and see how many tons of fuel is used in the management. Also we share our examples of toolkits, thanks to other partners, for example, for paper used in administration. So there's a way to compare them, to monitor. We are still learning that from other countries that have more and more worked on it.

GM: Are those toolkits from the Interreg program or from the European Commission?

VRC: The tools we are getting are from the Interreg program, from the international event and also online communication we are doing now.

GM: How is certification done?

VRC: I don't know exactly. I can say that ecolabels, ISO. Their companies can be certified by a third party that it's consultant and so on. So, I think it's more product and services having the labels. We learned in other countries, they are more than ten of that. We were in a webinar of an expert in Italian national event they have done for the project. There was an expert talking about ecolabels, how to control that and how to avoid even wasting. So there's a lot to do with that. You know, ecolabel in fact is not controlling, but adopting to what the company has already done. So I think ecolabels is a good way to control products and services. I don't know if the company is getting an ecolabel just products and services. It's also a must to control.

GM: How did the transition towards the green public procurement go?

VRC: If we're talking about feeling, there's good feeling there. They want to work in that direction. The technicians, policymakers are taking part in different workgroups and meetings to discover and to learn how to implement GPP in our action planning to consider the need. We will organize the capacitation for the policymakers for turning to GPP.

GM: What were the initial mechanisms done to stimulate GPP adoption? You already mentioned that you conducted meetings.

VRC: Right now, meetings for all technicians and the local policy makers- can be mayors, personnel in charge of the mayor, public servants. We will start with people, citizens with our campaign, with a role that we call environmental educator.

GM: That is a nice term, environmental educator.

VRC: It is true that we will do that because people have to be involved in sorting the waste at the very beginning, they will discover how to do that. In the long term, they will be punished if they don't do that.

GM: So, for now it's just the policies and then next would be the users already.

VRC: I guess the users would be at the end of the year or maybe the beginning of September, October,

GM: Do you also conduct trainings to suppliers?

VRC: We consider an annual forum, different meetings and conference directed to suppliers to know the products and services.

GM: So what do you think would drive the successful implementation of GPP in your region? What do you think will make people adopt GPP? What are the important factors?

VRC: The factors for success? First, we need the implication of the citizens. That's true in the case of sorted waste management. Reaching the goal of sorted waste and changing the vision of people towards GPP. At the very beginning, we are doing a campaign that will help. Later there will be punishment to pay an amount if they don't do that. There's a monitoring system to control that. And with the people who are concerned about climate change, they need to include green criteria in their own life, that will force public servants to change also to GPP. Also another point to see if it will succeed or not, if technicians learn how to do that and see other good practices and see the benefits. Of course, if public servants are involved in that, and if at the same time if there some changes in the national or regional level also will be important.

GM: How about the barriers?

VRC: As I told you before, the legal frame for us is one of the biggest barriers. There are no obligations to add green criteria in the public procurement. You can choose only one between social and green criteria. And it's also a barrier, the knowledge of the green criteria, the knowledge of the benefits. We, in Spain compared to other countries and cities, they have a monitoring plan, very developed. So, in Italy for example, if I compare to the experience we have, they are already in the stage of comparing the success, what the good thing is, and they will dispatch. Thanks to the monitoring step and we are still trying to move to that, to start with it. So, legal frame is one of the barriers and GPP tradition. The implication of the public servants. They will know the importance and they will do changes with that. Investment and also the market. The market is

able at the very beginning. They have to know the benefits and then they will be able to include the green criteria.

GM: You also mentioned before that they have this perception that GPP is costly.

VRC: Yes, because we have to spend money at the very beginning. Ecolabel products or more sustainable products with long lasting life will be more expensive when you are paying that at the very beginning. For example, in electricity, all the streets, public electricity, you have long lasting lights that are more expensive. But they're saving energy, and they are lasting for more years. But in the very beginning, you have to do a higher investment. So it's a simple example of what I mean with that. They have to know all the lifecycle of that product or service to know that. In fact, it's better for them also.

GM: So the most important thing is awareness.

VRC: Yes, awareness in all the levels. Citizens, policymakers and suppliers.

GM: How are these barriers addressed? Are they included in the Action Plan?

VRC: Three steps strategy: capacitation, implementation and monitoring. The project is still on the go. The legal frame barrier is a lot of action to be done. Yes, it has to be considered to develop the Action Plan.

GM: What do you think will the impact of GPP be in Valencia or the MANRA region?

VRC: From the very beginning, we improve the quality of our products and our life with less pollution, less energy spending in different processes, any recycling and sorted management. If we succeed with the pilot case of sorted waste management, we will have less investment and higher rate of recycling. So that would also imply to follow some legal obligation of the percentage of recycling waste from the total waste. So that's also a change of mind and benefits.

GM: How do you plan to monitor and evaluate these impacts?

VRC: At the very beginning, I told you about electronic system for monitoring the pilot case, the waste management. So that will give the numbers of an average waste management at the very beginning at each stage of the process. So it's a way to see the success and if they have some risk or some problem to be solved. You can have the information, not in real time, maybe daily or weekly. In addition, there will be an inspector role, a person who in charge to control the success of this pilot program and also in the policy making level there will be a committee composed fundamentally of some people from the municipalities to control it. The next steps, we will also add the toolkit, the other parameter choosing to compare the success of the GPP implementation and to compare that to see if any extra decision has to be done to adopt corrective measures to do that.

GM: So what do you think is the future direction of GPP in the Ribera Alta Region?

VRC: Having a good experience in the implementation of green criteria and economic efficiency in those parameters would help to change the vision of local servants through GPP, the market will adapt to these requirements and the society will see the benefits.

GM: In how many years do you think that all the municipalities will adopt it? And also in the whole Spain, what do you think will be the direction?

VRC: The Action Plan has a length of 2 years so until the very beginning of 2022 we are expected to have this different actions implemented, to help technicians capacitated. We have a pilot case,

the monitoring, Also the awareness campaign. I don't know in the national legal frame, we have some changes in the short term. I don't know, maybe in five years, we will see green requirements in the rules.

GM: In Spain, are you the first one to implement this kind of project?

VRC: No, also other regions are involved in other programs because we saw some manual of GPP, for example in Extremadura, that's a region that is next to Portugal. It's in the west. So they also have implemented a GPP program. Also in Catalonia, especially in the municipality of Barcelona. They have a manual of how to include green criteria in public procurement in the local level.

GM: Do you think Spain has a strong GPP level of implementation?

VRC: No, not at all. In fact, that was our problem here in MANRA because there was everything to be done. So we don't have points to start working.

GM: But it's good that you're starting now.

VRC: That's true, that implies a lot of work. It's also difficult to access stakeholders on the higher level. But I think in the long term that we will have other benefits from our society.

GM: By the way, are you also considering giving financial assistance to the business sector?

VRC: It is not included. It is not my decision, it's the decision of the policy makers and few people in charge here in MANRA. We haven't considered that. The stakeholders, the Chamber of Commerce, have asked for that or not. We are giving a free training or free consultation. It will be considered a non-financing action. We organize workshops or some meetings, they are for free for companies. We are more thinking about, you want to access to a public procurement, be a bidder, then you have to include green criteria that could be mandatory or awarding criteria that will help you to find a company that will offer that service.

GM: How do you see the efforts of the European Commission with GPP since you are part of a European GPP project?

VRC: Yes, we are very happy with that because that's the way to learn very fast. We are in contact with another partner in other countries, they implemented different solutions. From them we can learn and we can also show them some of the things we are implementing here and a way to work faster. We can have some input from other partner countries, the same level or one step forward or one step back, if you're interested in the feedback.

GM: Are there other recommendations or insights you want to share?

VRC: In GPP, it's very important to consider the legal frame is the most important thing to start to deal with. The stakeholders, it is true you have to find a lot of them, because we'll find some of them in higher level, but less implication with that. Another one that will be smaller, about wanting to do with GPP. Also important to find the experts in environment processes, also in public procurement. The most important way to improve in the application to GPP is to be in continuous contact with other administration in other countries that had good experience in implementation of GPP. Also with climate change, people are changing their mind about how they must behave with the ecological criteria. The problem is, I think you cannot see it, it is intangible and long term. Climate change is something that's outside, but you cannot see the effects, only sometimes. It's not very easy to see. We have to behave because it's very hard. So there is still a lot of work but we are in the way. I am optimistic but it requires a lot of work.

P Interviewee SE Transcript

Interviewee : Joakim Thornéus
 Organization : Swedish National Agency for Public Procurement
 Position : Sustainability Specialist
 Country : Sweden
 Date & time : May 12, 2020, 2:00PM
 Duration : 45 mins
 Channel used : Skype
 Interviewer : Graciela Mante

GM: Can you tell me about your organization and yourself?

JT: I work as a Sustainability Specialist for our organization, that is the Swedish National Agency for Public Procurement. We are an agency under the government. We work with different aspects of public procurement among others, also assess sustainability of the public procurement. We are a support agency so we don't do any rules or legislations but we give support for those organizations in Sweden that do public procurement. We also have a sort of a help desk, where public procurers can write or call us and answer some specific questions. For example, how to interpret the legislation among other things. We also are quite a lot out talking to people at different seminars about public procurement. And we have not been around so long. Our organization is five years old now. Before that, the support for public procurement were from different organizations, but five years ago, the government decided to have it in one organization. So we don't do any public procurement ourselves besides the things we need for our own business.

GM: Are you using GPP or SPP?

JT: Nowadays, we're mostly talking about SPP because we are working with environmental aspects but also social and economical aspects.

GM: When did SPP start in your country? Was it a national initiative?

JT: I think it was on our own initiative. It's been a gradual thing. We started working with green public procurement maybe the beginning of 1990s or mid-1990s. That was also on local initiatives from start, but the social public procurement time, the short social aspects of public procurement has gradually become more important. It started maybe 10 or 15 years ago. But the environmental aspects, we have been working for quite a long time.

GM: Do you have a national action plan or a similar framework?

JT: Yes, we have. We don't call it an action plan but it is called the National Public Procurement Strategy. So the goal with the strategy is to make public procurement used more as a strategic tool for public organizations. It's a policy and it is only binding for the governmental agencies as well as municipalities.

GM: Is it also not mandatory like the GPP directive of the European Commission?

JT: Yes, but the government follows it up in certain ways and our agency is one of the organizations that's been following this up. Of course, the legislation procurement strategy is not mandatory but it's mostly recommended to have environmental requirements for public procurement. There are no mandatory requirements.

GM: I have read a lot about Sweden being a frontrunner in environmental concerns. So, in the initial phases, what were done by the government to make municipalities and other agencies adopt to green or sustainable initiatives?

JT: I think it started about 20 years ago. I started working on this but then the government developed tools for municipalities to use in doing public procurement. The government developed criteria that could be used in green public procurement, the environmental criteria and we are still managing those criteria nowadays, but it started 20 years ago. But it's not a mandatory tool. It's free, voluntary to use. But we know that many are using the criteria. So it's been the municipalities who have been encouraged to do this and many municipalities have also been frontrunners because we have the large municipalities in Sweden, Stockholm, Gothenburg and Malmo, they have made a lot of things because they have politicians that have been driving these questions and so on. I would say that municipalities also, they are doing more than the government, I would say.

GM: So, to what extent has been implemented? Can you tell me about certain percentage of the municipalities? Is it more than 50%?

JT: Yes, it is. It's difficult to measure it because we have almost 300 municipalities in Sweden. Of course, the large ones are doing a lot because they have the resources. But we have a lot of small municipalities in Sweden. They may only have one person doing all the procurement in that municipality. And of course, those municipalities, it is more difficult because they don't have the knowledge, the resources, and they don't have the time to do it because they have only one person supposed to do all the procurement in the municipality. I would say even though most municipalities to some extent do it.

GM: Is there also a national target that you set that is included in the procurement strategy?

JT: No, we don't have a target. Maybe you are looking more on the effects. We are also trying to make it strategic because those targets are difficult to set. It's very difficult to know if you have had monthly requirements in the public procurement, it doesn't mean that the public procurement was good or that it actually had some effect on the market. So, it's not that interesting to look at those figures, actually. It's more interesting to work with strategic thinking and also looking at things on a larger scale.

GM: But so far, the inclusion of environmental criteria in the tenders have been increasing for the past years?

JT: Yes, I would say so. Yeah, I know that within the government, they are looking on how many governmental agencies that have environmental requirements in their tenders. And I think it's 95% that have at least had one environmental requirement in their tenders. So its scale is increasing. But now we are trying to look more at the effects on the market and also trying to see what criteria have the most effect, which should be prioritized. That is very difficult. For smaller municipalities, they need to focus on a few procurements. They can't have a monthly requirement in every procurement because they don't have the time, the resources to follow up. In some cases, it's not necessary to have monthly requirements. So they need to focus on the most important ones, where they can actually have an effect and have the resources to follow up also.

GM: So your organization is the one taking care of GPP implementation and its monitoring?

JT: To some extent, yeah.

GM: Do you practice a centralized procurement system?

JT: Yes, we have centralized procurement for the municipalities when it comes to frame agreements, because we have an organization that do frame agreements for municipalities. So

they can use those agreements if they need to. It's things like furniture for schools, for example. There is one certain organization who does those agreements on behalf of the municipalities and we also have a similar organization within the government that makes frame agreements. The government also.

GM: Do you have a procurement council or is your office acting like one?

JT: We don't have a certain council but we have some tasks in procurement.

GM: In Finland, they have KEINO, a network competence centre. Do you also have a similar network with stakeholders, including the business sector or other non-government organisations?

JT: We are working together with other organizations in different ways. We don't have a setup like Finland has but we are the central agency. Then we are talking to other agencies and other stakeholders as well who are working with these issues. We have a lot of contact with other organizations.

GM: Are you also actively engaged with the business sector, the SMEs?

JT: Yes, we are, because one of our tasks is to make it easier for smaller SMEs to take part in public procurement. That is also one of the things in the Public Procurement Strategy, to encourage the SMEs to take part in the public procurement.

GM: How many categories do you currently have for GPP?

JT: We have a tool for green public procurement. We have quite a lot of criteria, around 50 different product categories and about almost 700 criteria.

GM: Do you have priority categories?

JT: Yeah, we have a priority system. We are working on trying to find those areas that can be most effective to have environmental criteria. So we're looking at multiple points of view. We're looking at analyzing on the market. So, there are a lot of things coming into this prioritization model. At the moment we are working with managing the central criteria. We are not developing so many new ones, trying to maintain those we have.

GM: How about certifications?

JT: We have the Nordic ecolabel. but we are not managing it. It's a quite large in Sweden, much bigger than ecolabel.

GM: How about ISO? I just recently read there's a new ISO guidance for sustainable public procurement, 20400:2017.

JT: We were part in developing it, but it's a global standard. It's supposed to be for both public and private procurement at the global level. But we have much more specialized things than that standard so we are not using it in practice, because we have other tools that are aimed in these things in Sweden.

GM: For the certification, are you just checking products or do you also check if the if the company has environmental management systems?

JT: Yes, it depends on what type of public procurement. For some product groups, we have requirements of the environmental management systems. It's not always possible to use, or not always relevant, but if for example, if you have public procurement of services, then it can be a

relevant requirement. We try to also use environmental labelling, when it's possible to use that as a way to show that the company is complying with the requirements.

GM: For the evaluation and awarding of contracts, do procurers decide or do you also give advice? Or is there a regional entity that does that?

JT: It is the municipalities that do that, the evaluation. We have some suggestions maybe, but every public procurer has their own ways to do it. There are no standardized ways to do it. Every procurement is unique in that sense. But we have suggestions.

GM: I have learned from other countries that some suppliers file lawsuits because they were not chosen. Do you also have similar cases in your country?

JT: Exactly. It's happening here also. But the trend is not growing. I think there are less lawsuits now. A few years ago, we did some analysis on that. And it's almost never about the green public procurement, or because of the environmental criteria. Most often it is about other things in the procurement. There are some errors made in the formal stuff. That's the main reason for those lawsuits.

GM: So about the bidders, are there also opportunities for them to say something about the development of environmental criteria? Do you also have dialogues with them?

JT: Yes. That's a very important part. We have a process of developing the criteria. We have working groups, and workshops where we invite all stakeholders. So this is both companies, procurers, environmental labels, and other stakeholders who are welcome to participate. Before we decide on the criteria, we also set out for open consultation. That's important to the companies that they have something to say also.

GM: That seems to be a great strategy.

JT: Yeah. Because I think if you release a criteria that nobody needs, it can be a problem. Also, if we use central criteria, sometimes they are very theoretical and not so practical. I think the public procurers need practical criteria.

GM: How did the transition to GPP or SPP go?

JT: It's a long time ago. I think that some companies have always been frontrunners, encouraged, because it's good for them. Some companies want harder criteria because they know they're going to meet them and other companies are more conservative and not that much proactive. But I think in Sweden, it has not been in some of kind of a struggle generally. Maybe for some product groups but I think for some sectors, the companies that are based in Sweden, for the IT sector, for example, there are no companies in Sweden manufacturing computers, for example. Multinational companies that are based in the US or China and so on, there have been a little bit harder also. But now that sector is also quite proactive. From the start they were a little bit conservative. But it differs from sector to sector, I think.

GM: Sweden is considered to be advanced in the sustainable public procurement field. What factors drove the successful adoption of environmental and sustainable initiatives in your country?

JT: I think there are several drivers. First, I think there is a political support for this. The politicians' support was important. I also think that Sweden had been working on environmental issues and other fields for a long time as well. So it was not seen as strange to have environmental criteria in the public procurement. But maybe the opposite. It would be strange not to have it.

GM: Are you saying it is a cultural thing?

JT: Yes, it has something to do with culture, I think. I also think that many Swedish companies have been quite frontrunners in their fields as well. So they were also encouraging green public procurement. I think there are several reasons.

GM: How about the barriers?

JT: I think one of the main barriers here is that there's a lack of resources because in many municipalities, there are only one public procurer as opposed to everything. I think that's the main barrier. There's no time, there's no money, there's no resources. The larger municipalities, they have sustainability experts that are participating in public procurement. The smaller ones do not have that, they don't have those resources. And I think maybe the lack of time is the most important one because the public procurers, they get the question, can you procure this, we need it now. They don't have time to sit down and think about what environmental criteria that could be useful in that public procurement because they need to deliver something quite fast.

GM: But generally, is there a good level of awareness already?

JT: Yeah, I think they are informed but there are some practical things that are barriers.

GM: How about for the supplier part?

JT: Maybe in the countryside, they can't contact many suppliers. It can be more difficult. So there can be one barrier if there's no suppliers locally that can deliver green products. The suppliers, I think, mostly they're asking for green public procurement. Maybe I think sometimes there's a lack of dialogue between the procurer and the supplier. The suppliers have the product from their point of view but the procurer does not know about that. They don't have the GPP criteria although they could have. The supplier could meet the requirement. So it's lack a dialogue that is one barrier.

GM: What are done to address these barriers? Are they included in the strategy?

JT: Yeah, they are. Because in the strategy, the government encouraged to have more dialogue between the suppliers and the procurers and we are also working with them in different ways. We have had arranged meetings between procurers and also the suppliers with our work groups to discuss things and they have been very successful.

GM: Are you also adding personnel? I think it might entail additional budget.

JT: Yeah, because I think that is one barrier. We don't have the money especially now. I think what we do with our tool, that can be one way to help them because we can provide them the criteria that they can use.

GM: What have been the most prominent impacts of SPP in your country? What were the benefits?

JT: We are actually working on that at the moment, but we have been talking to suppliers and we know that for some sectors, they actually had an impact. For the food sector for example, we know that there are now many more ecological products. Because in Sweden, the schools source food for the kids, so the municipalities buy a lot of food products and they have had the criteria and requirements on that. For quite a long time, the supplier say it have had a big impact on their business. I also know from other businesses, for example, from transportation business, transportation companies, and also electrical vehicles. It is made easier for them to have a market because of the public procurement.

GM: Do you have a system to evaluate and monitor the impacts?

JT: No. We wish we could have that. It's very difficult to do it, of course. But we are we are working on that, looking into on how we can actually measure it.

GM: But for now, what is being done?

JT: We are doing spend analysis for the public sector. We are connecting environmental aspects to spend analysis so we can see, for example, the carbon dioxide emission from Swedish public procurement. We are working especially on that this year, and looking on how to make that statistics better and also how to pull up the trends, how to set targets. So, that is one way to look at it. The numbers are quite large. So it's hard to see the impact. There are a lot of kinds of things also. But otherwise we have been looking for a few years ago, we asked for 500 tenders and analyze them, looked at into the extent of environmental requirements and so on. So it is also one way to do it but it is also quite time-consuming.

GM: So what's the future direction of public procurement in your country? Are you also going circular?

JT: Yeah, exactly, we are working on that. This year the government wants us to put up, to do a lot about circular public procurement. So we are doing quite a lot of projects this year about public procurement for circular economy. It is something we are looking into. But we have quite a lot of environmental criteria today, they are also aiming for circular economy. So it's not something that is actually so new for us. But now there's a name on it. Now it's called circular economy, but we have actually worked with the same issues for quite a while.

GM: Do you have a circular plan like the Netherland's Circular Dutch Economy by 2050?

JT: Yeah. The government is actually working on the actual plan for circular economy at the moment, so we are waiting for it. Maybe now it will be delayed. It was supposed to come out. this action plan for circular economy this year, spring actually. But I think the government will probably have some target year. We have a target year for being climate neutral by year 2045. I guess the circular economy target year can be the same to reach the climate targets.

GM: Do you think the sustainable public procurement needs to remain voluntary, or a shift to mandatory ruling is more beneficial?

JT: I think it should be voluntary because it's difficult to have mandatory requirements. It can go so wrong because then you're focused on the requirements. But it should be the effects that you want to reach. You can have requirements in public procurement but they can be bad, they can be without effect and so on. So then it's a target. I don't think it will be so helpful to have mandatory requirements, because it doesn't say anything actually because if you have the wrong requirements, it will do no good. So it is better to work with effects and also focus on the follow up. Because if you have mandatory requirements but don't do any follow up, then you don't learn anything. I think follow up is more important.

GM: Do you use the GPP toolkits from the European Commission?

JT: I think it's very good to have this toolkit from the EU. We are looking into it sometimes. Sometimes it's very theoretical and it takes so long time for them to develop those criteria. It takes like four or five years for them to develop a set of criteria. When they are published they're already old. They are also linking the criteria to the EU ecolabel. For example, for computers they have linked it to the EU ecolabel, but the problem is that there are no computers that have the EU ecolabel. So the public procurement, if you use the GPP criteria, they are so theoretical, there are

no actual products that meet the requirements for you to use them. But I think it's good that EU provides with such a toolkit. But it could be a little bit faster and a little bit more practical to use.

GM: Do you have advice to some countries who are still developing their GPP or SPP strategies?

JT: I think they need to start talking with the stakeholders, involve the stakeholders, both the public procurers and also the personnel of companies, the suppliers. They can start discussing what is most possible doing in that country. And also have time to prioritize what areas to start with. Then maybe look at climate change or some parameter to use for the prioritisation. In Sweden, we say, start with the lowest hanging fruits, also the most easy to pick. Also try to think far ahead and not try to do everything in just a couple of years. Understand that it takes time, they need to endure it. Prioritisation is important.

GM: Are there other insights you want to share?

JT: Yeah, maybe also not to focus on the number of the percentage of procurement with the GPP. Maybe more on how to set up the public procurement to reach goals. It can be other ways than just having criteria in the tenders. For example, if you decide to buy secondhand computers instead of new computers, they have made it quite a good procurement, saves a lot of carbon dioxide. They need to think that way than measuring percentage. Yeah, thinking about what you buy and what you need and how you can fulfill that need with the lowest environmental impact as possible. There can be several ways to do it.

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