

GREEN PUBLIC PROCUREMENT: a strategic policy tool for accelerating Europe's industrial transition

A roadmap for Member States to strengthen competitiveness, resilience
and industrial decarbonisation

September 2026

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We are Europe's largest network of environmental citizens' organisations. We bring together over 190 civil society organisations from more than 42 countries. Together, we work for a better future where people and nature thrive together.

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AUTHORS & CONTRIBUTORS



NATUUR
& MILIEU



ecodes
tiempo de actuar

Jai Krishna Ranganathan

Simon de Jonge with contributions from Aniek Blokzijl.

Tadeáš Rulík, with contributions from Benjamin Hague.

Daiana Bouzo, with contributions from Juan Fernando Martín.

REVIEWERS:

Michail Kapetanakis, The International Institute for Sustainable Development (IISD).

Núria Cases i Sampere & Serena Lisai, Association of Cities and Regions for Sustainable Resource Management, (ACR+)

Helena O'Rourke-Potocki, ICLEI – Local Governments for Sustainability

Iñigo Aizpuru de Llanos, Basque Environmental Agency (Ihobe)

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European Environmental Bureau (EEB)
Rue des Deux Eglises 14-16
1000 Brussels, Belgium
eeb.org
<https://meta.eeb.org>
comms@eeb.org



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Executive summary

The effects of climate breakdown are felt more and more, and climate tipping points are fast approaching. The upcoming years will be decisive in our efforts of preserving a habitable planet. Europe's industrial sector is a major emitter of CO₂ and other pollutants. Decarbonising industry is therefore fundamental for achieving climate objectives. At the same time, this transformation represents a strategic opportunity to strengthen industrial competitiveness, economic resilience and Europe's long-term prosperity.

The production of steel and cement are especially polluting, causing more than 9% of the EU's greenhouse gas emissions. EU governments, as the main buyer in the construction and infrastructure sectors, hold tremendous purchasing power and have the ability to reshape the production of these materials. Green Public Procurement (GPP) can help move steel and cement from “hard-to-abate” to “ready-to-transform” industries. It can create demand for low-emission materials,¹ reduce investment risks and accelerate the deployment of clean technologies, including renewable-powered production, recycled steel, electric arc furnaces, and low-clinker and clinker-free cement technologies.

Accelerating this transition is not only essential for meeting climate targets, but it is an economic and security imperative as well. Continued dependence on fossil-based production exposes European industries to volatile energy prices, geopolitical risks and increasing carbon costs. As free ETS allocations are phased out and carbon border measures take effect, companies that delay transformation risk losing competitiveness and facing stranded assets. Conversely, early action can position European producers as global leaders in clean industrial technologies.

The benefits extend beyond climate mitigation. Decarbonising steel and cement production can reduce air pollution, health costs and environmental damage while supporting quality employment, regional development and Europe's strategic autonomy. By integrating environmental performance, resource efficiency and circularity into procurement decisions, governments can ensure that public spending contributes to a resilient and sustainable economy.

The European regulatory landscape is rapidly evolving. The Construction Products Regulation (CPR), the Ecodesign for Sustainable Products Regulation (ESPR), the forthcoming Industrial Acceleration Act (IAA), the recently proposed Public Procurement Act (PPA) and the Circular Economy Act (CEA) will progressively strengthen requirements for sustainable procurement and low-carbon products. While these frameworks will provide common rules, Member States have a unique opportunity to act now and prepare markets before future obligations become binding.

This paper provides a practical roadmap for national authorities to leverage Green Public Procurement as a strategic industrial policy tool, drawing inspiration from Europe's existing best practices. The paper encourages the creation of more lead-markets through public procurement for the steel and cement industries. At the same time, it highlights the actions needed for making all public procurement strategic and green. The eight priority actions listed are: identifying the baseline of current GPP; establishing clear GPP targets and monitoring systems; strengthening institutional capacity; aligning technical standards; applying lifecycle and full-cost accounting approaches; introducing ambitious environmental criteria; developing flagship projects and market partnerships; and deploying targeted financial incentives.



By moving beyond a compliance-based approach and recognising procurement as a driver of innovation and industrial transformation, Europe can turn public spending into a powerful lever for clean competitiveness, healthier communities and a resilient zero-carbon and circular economy.

Introduction and context

EU governments hold enormous purchasing power, spending over €2 trillion annually (about 14% ²of EU GDP) on goods and services. As a major buyer of emission-intensive construction materials,³ the public sector is linked to some of Europe's most polluting industries. Steel production accounts for 5% and cement for more than 4% of total greenhouse gas emissions in the EU, with a large proportion of these emissions being inherent to the production process itself.^{4,5,6} Decarbonising these sectors is fundamental to meeting climate targets. However, this transition should not only be understood as a climate necessity, but also as an opportunity to modernise European industry, protect quality employment, strengthen strategic autonomy and ensure Europe's competitiveness in a rapidly changing global economy. Public procurement of steel and concrete thus provides a powerful tool to drive demand for low-emission products, stimulate industrial transformation and create the market conditions needed to scale clean technologies.

Steel and concrete are woven into every aspect of modern infrastructure, from buildings and bridges to renewable energy installations. These materials are also essential enablers of Europe's strategic priorities, including renewable energy deployment, housing, transport infrastructure and industrial transformation. Ensuring their sustainable production is therefore critical for Europe's future resilience and economic security. However, current production methods have a profound impact on our environment, which goes beyond greenhouse gas emissions. The external costs of emissions, as reported by the European Environment Agency, based on damage from air pollution impacts on human health from Europe's energy-intensive industries, amount to approximately €73 billion annually. This usually includes damages due to ill health, premature deaths as well as loss to agriculture and ecological risk. Non-metallic minerals (cement, lime, glass) and ferrous metals (steel) together account for 55% of that figure.⁷ These numbers represent climate-related damage, lost productivity and severe health impacts.

Transitioning to clean production of steel and concrete is necessary, both from an environmental and an economic perspective. Leveraging green public procurement to accelerate this transition provides a variety of benefits:

1. **Strategic autonomy:** Continued reliance on fossil fuels exposes industries and member states to price shocks, supply disruptions, and geopolitical volatility. This dependency creates fragile supply chains, as demonstrated by recent energy crises, whereas decarbonisation enhances energy sovereignty and stabilises production costs over time.
2. **Long-term competitiveness:** Free allocations for the EU Emissions Trading System (ETS) are being phased out, carbon prices are expected to increase, and the Carbon Border Adjustment Mechanism (CBAM) is coming into effect. Capital locked in fossil-based production risks becoming a stranded asset. Industries that have not transitioned in time will lose their competitive edge. Low-carbon alternatives will remain competitive in a climate-neutral economy.
3. **Stimulating market creation and innovation:** GPP can create demand for low-emission steel and concrete. This creates a business case for investments in clean production technologies. Member states signalling demand early will benefit from faster innovation and lower transition costs, gaining a competitive head start. Public authorities are not only

regulators and buyers, but also market shapers. Through their purchasing decisions, they can reduce investment risks, accelerate innovation and create the demand conditions required for clean industrial technologies to scale.

4. **Levelling the playing field and ensuring fair competition:** The current market is uneven because fossil-intensive producers do not bear the full environmental and health costs of their production. Early GPP implementation corrects this distortion by establishing a transparent framework that penalises emissions and rewards clean production. By shifting toward true cost accounting, GPP ensures fair competition and removes the artificial price advantage currently held by high-carbon materials.
5. **Cost-effective decarbonisation:** One of the key areas is highlighting GPP as a cost-effective tool for supporting markets for low-emission materials, particularly at a time of constrained public budgets. Studies assessing the costs associated with GPP show that the additional costs of using low-emission construction materials such as steel or cement (concrete) are minimal: research by the Brussels School of Governance indicates a range of 0.2 to 0.5 percent,⁸ while a school construction case study in Zurich, conducted by Ramboll, points to a cost increase of 1% compared to a 17% reduction in emissions.⁹ GPP can thus make a significant climate impact, with only minimal additional costs. While the use of GPP criteria and its evaluation do add a cost to the administration of GPP, estimates also indicate that the costs of digitising procurement offer cost savings far greater than the cost of administering GPP.

There is a lot of development in EU policy files that influence public procurement. This report focuses on procurement of steel and cement, but the scope is not limited to just these industries. Relevant case studies, best practices and recommendations concerning Green Public Procurement in general are included as well.

The next chapter describes EU policy developments in more detail. EU regulations will take time to finalise, but member states have the freedom and the incentive to anticipate requirements and prepare. Developing common methodologies, standards and criteria at the European level will be essential to provide legal certainty for both public buyers and industry, while allowing innovative low-carbon products to scale across the Single Market. The window of opportunity is open now. Authorities can build institutional capacity and minimise administrative friction before EU-wide mandates become legally binding. This proactive approach ensures that the transition is a strategic advantage, rather than a regulatory shock. Those that move now will be much better positioned once regulations become binding.

EU policy timeline

The transition toward Green Public Procurement (GPP) is gaining regulatory momentum, with environmental criteria increasingly being integrated into the EU public procurement framework, although GPP remains largely voluntary in practice. This timeline outlines specific upcoming legislation related to GPP for steel and concrete. It is intended to help member states prepare for future mandates and shield their industries from regulatory shocks.

Construction Products Regulation (CPR): The revised CPR entered into force on January 7, 2025. The CPR aims to produce harmonised standards covering basic requirements and essential environmental parameters for all construction products, including construction steel and concrete. The CPR will adopt delegated acts for GPP, which will define mandatory requirements for public procurement. While harmonised technical specifications for all products regulated under the CPR will be updated gradually through 2039, the Commission will launch an impact assessment by December 31, 2026, to establish mandatory GPP requirements. However, these requirements will establish only minimum standards and are expected to come into force aligning with the IAA in 2029, missing a critical window of opportunity to support low-carbon investments in energy-intensive industries now. Contracting authorities retain the right, and should take advantage of the opportunity, to set more ambitious environmental standards ahead of minimum mandates/ quotas.

Ecodesign for Sustainable Products Regulation (ESPR): Entered into force on July 20, 2024, the ESPR currently targets iron, steel, and aluminium as priority groups for establishing minimum requirements for ecodesign. Specific performance parameters and GPP labels for steel are expected as delegated acts in late 2026, followed by aluminium in 2027, becoming enforceable 18 months later. A "safeguard clause" for cement ensures that if the CPR fails to set adequate sustainability standards by 2028, the Commission will implement ecodesign requirements under the ESPR in 2029.

Industry Accelerator Act (IAA): Proposed in March 2026, the IAA introduces minimum mandatory procurement quotas for environmentally friendly materials: 25% for low-carbon steel/aluminium and 5% for low-carbon concrete/mortar. These quotas apply specifically to high value works contracts exceeding €5 million and are expected to be enforced by 2029. The act aims to harmonise low-carbon thresholds with the CPR and ESPR to provide a clear market signal for lead industries.

Public Procurement Act (PPA): The European Commission has presented a proposal for the Public Procurement Act on the 9th of September 2026, which has revised and replaced the current EU public procurement framework established under the three Public Procurement Directives (2014/23/EU, 2014/24/EU and 2014/25/EU). The reform aims to simplify and harmonise procurement rules across the EU while strengthening the strategic role of public procurement in supporting competitiveness, innovation, resilience and sustainability, including environmental and social objectives.

The future PPA is expected to focus primarily on “**how to buy**”, establishing common rules on procurement procedures, award criteria, strategic procurement, planning, digitalisation and transparency. The framework would need to ensure stronger coherence with sectoral legislation such as the Construction Products Regulation (CPR), the Ecodesign for Sustainable Products

Regulation (ESPR) and the Industrial Accelerator Act (IAA), which define sustainability and performance requirements related to “**what to buy.**”

The reform represents an important opportunity to better integrate climate and environmental considerations into public procurement, through the use of CO₂ performance criteria, life-cycle costing approaches and sustainability requirements. However, further clarification will be needed to ensure that procurement rules effectively translate sectoral climate and industrial requirements into market demand and contribute to industrial decarbonisation.

Integrated legislative timeline: key requirements and measures

Date	CPR <i>Construction Products Regulation</i>	ESPR <i>Ecodesign for Sustainable Products Regulation</i>	IAA <i>Industry Accelerator Act (Proposed)</i>	PPA <i>Public Procurement Act (Proposed)</i>
Scope	Harmonised standards for environmental sustainability and safety performance of construction products in the EU market, as well as mandatory GPP (including construction steel).	Environmental sustainability and circularity requirements for products, digital product passports and minimum mandatory GPP criteria — steel and aluminium as priority groups.	Accelerated permitting, creation of lead markets in public procurement for low-carbon products and materials of 'Union origin', regulation of foreign direct investment in strategic sectors and designation of industrial acceleration areas.	Revision of EU public procurement framework; aimed at simplification, and coherence across sectoral directives including CPR, ESPR and IAA, strengthening economic security and sovereignty, and aligning public procurement policy with EU strategic objectives.
2024-2025	✓ Entered into force (7 Jan 2025). ✓ First working plan (3 years) adopted (16 Dec 2025), covering 37 product groups.	✓ Entered into force (20 Jul 2024). ✓ First working plan adopted (16 Apr 2025): iron & steel and aluminium are prioritised for setting ecodesign performance requirements.	Announced in 2024 as a part of the clean industrial deal.	Announced in 2024 as a part of the clean industrial deal.

Date	CPR <i>Construction Products Regulation</i>	ESPR <i>Ecodesign for Sustainable Products Regulation</i>	IAA <i>Industry Accelerator Act (Proposed)</i>	PPA <i>Public Procurement Act (Proposed)</i>
2026	By 31 Dec 2026: Commission launches first impact assessment for mandatory minimum GPP criteria. Consultation with member states and stakeholders.	Q4 2026: delegated act for steel expected. Implementing acts: mandatory minimum GPP requirements.	Proposal published 4 Mar 2026 (Clean Industrial Deal package). Proposes mandatory GPP requirements with quotas for low-carbon products and 'Union origin' with effect from 2029 based on the definition of low-carbon thresholds (via ETS benchmarks / CPR / ESPR). Legislative procedure under way.	Sep 2026: Proposal for the Public Procurement Act, Harmonisation of criteria from IAA, CPR, ESPR and EED into a single framework.
2027-2028	Gradual update of harmonised technical specifications and alternative certification under European Organisation for Technical Assessment (EOTA). Harmonised standards for the usual EN 197-1 cements to be adopted by June 2027.	2027: delegated act for aluminium expected. First product requirements enter into force ~18 months after adoption (~2028–2029).	Expected entry into force. Proposed: 25% quota: low-carbon steel & aluminium (works contracts >€5 million ¹⁰). 5% quota: low-carbon concrete and mortar. "Made with EU partners/ Union origin" criteria.	Legislative procedure.
2029-2030	2029: submission of harmonized standards for most priority product groups of the first working plan. 20XX: Delegated acts establishing mandatory minimum GPP requirements for public procurement.	Continue to develop ecodesign requirements for textiles, furniture, tyres and mattresses along with revision of energy labelling of products from the previous working plan. By 2029: If performance and information requirements from the CPR are inadequate, the Commission can set them under ESPR from 2029 but before 2030.	Optional delegated acts complementing ESPR and CPR thresholds. May review of low-carbon and EU origin requirements for public procurement.	Public Procurement Act enters into force. Will provide the legal framework and guidance for implementing sectoral legislation, including how "European preference" should be applied. It may also provide the legal basis and framework for mandatory procurement requirements, including GPP.
After 2030	Continuing updates of harmonised technical specifications for all regulated product groups (until 2039).	Second ESPR working plan: Progressive extension to further product groups.	Full market signal for lead markets in low-carbon materials.	Full harmonised application across member states.

A national roadmap for green and strategic procurement

The EU policy landscape is rapidly evolving, and stronger Green Public Procurement requirements are now a part of the future reform of the EU public procurement framework. The proposed Public Procurement Act (PPA) represents an opportunity to redefine public procurement as a strategic instrument for climate neutrality, industrial competitiveness and resilience.

The PPA is expected to strengthen the recognition of strategic procurement objectives, including environmental and socially responsible procurement, circular economy and innovation. This creates a strategic opportunity for Member States to act early and establish ambitious national GPP frameworks that provide clear market signals, build procurement capacity and prepare for future EU requirements.

This chapter provides a step-by-step checklist outlining the key elements of an effective GPP policy, drawing on leading national and regional examples. This checklist is applicable for designing effective policies for steel and/or concrete as well as more general procurement policies.

A step-by-step checklist for ministries and contracting authorities:



1) Collect data on current use of GPP and identify the baseline and main challenges

Before Member States define binding targets or build institutional capacity, they must gain a clear overview of their starting point. Identifying the current share of green procurement and analysing the primary technical or administrative barriers is essential for ensuring that future requirements are ambitious, yet realistic and aligned with domestic market capabilities. Without

understanding the root causes for the low adoption of low-emission materials—whether related to price, availability, or outdated standards—subsequent measures cannot be effectively calibrated.

Actions

- Conduct a comprehensive public procurement audit of construction materials (specifically steel and concrete) purchased over the last 3–5 years to identify the current GPP baseline and greenhouse gas emission intensity.
- Perform preliminary market consultations with domestic industry and material producers to assess market readiness, identifying the availability of low-carbon products and existing industrial capacity.
- Identify specific technical and legislative bottlenecks by auditing national standards and procurement procedures that may act as invisible barriers to innovative, low-carbon, or recycled materials.
- Assign institutional responsibility for data collection and baseline analysis to a central body to ensure a consistent national starting point before target ownership is established.
- Integrate data findings into a national diagnostic report that serves as the foundation for future binding targets, monitoring systems, and annual public reporting obligations.
- Communicate the baseline findings clearly to all contracting authorities (central, regional, and municipal) to ensure a shared understanding of the gap between current performance and upcoming EU requirements.

Key tools & references

- EU Preliminary Market Consultation Guidelines for strategic engagement with the supply chain.
- Environmental Product Declarations (EPDs) and carbon databases for material benchmarking.
- LCA (Life Cycle Assessment) methodologies and carbon accounting standards to quantify historical impacts.
- Tallinn Circular Economy Centre case study as a model for assessing market feasibility.¹¹
- National reporting frameworks such as e-forms and public procurement data spaces to automate future data tracking.

2) Establish a monitoring framework and set national GPP targets

Without binding, time-bound targets and a monitoring mechanism, subsequent steps lack accountability and direction. Member states that act early help their industries with time to adapt and provide their procurement officers more certainty.

Actions

- In collaboration with a wide range of stakeholders define binding, climate-neutral GPP targets with clear milestones — for example: 25% of low-emission, responsible concrete in public construction by 2030 or an overall target to achieve net zero carbon emissions in public

procurement by 2050; Adopt formal interim milestones for the binding national target., with (e.g. for 100% climate-neutral public procurement, interim targets could be: setting XX% of construction procurement meets low-emission criteria by 2029; all high value and long term contracts reduce carbon emissions by 50% as compared to baseline in 2035).¹²

- Assign institutional responsibility: designate a lead ministry or inter-ministerial body with a clear mandate for GPP target ownership and coordination.
- Establish a national monitoring and reporting framework closely aligned with e-forms and compatible with public procurement data space (see tools section below): define indicators (e.g. share of tenders including environmental criteria, share of public procurement expenditure covered by GPP criteria, tonnes CO2 avoided), data collection methods, and annual public reporting obligations.
- Integrate GPP targets into existing national climate strategies, industrial policy documents, circular economy strategies and public spending frameworks to ensure coherence.
- Communicate targets clearly to contracting authorities at all levels — central government, regional, and municipal — with guidance on how they translate into individual procurement decisions.

Key tools & references

- EU GPP criteria.¹³
- Reporting frameworks – Public procurement data space and e-forms.¹⁴
- National GPP strategies and action plans from leading member states (Netherlands, Sweden, Finland, Spain, Ireland¹⁵) as benchmarks.

3) Build capacity: establish a national GPP competence centre

The most frequent barrier to GPP is not political will but practical knowledge. Even where political commitments exist, contracting authorities often lack the technical expertise, tools and resources needed to translate ambitions into effective procurement practices.

A national GPP competence centre — a dedicated agency, a unit within an existing body, or a networked hub — removes this barrier through centralised support, standardised documentation, accelerated digitisation and continuous learning. This is especially critical for smaller municipalities and regional authorities without in-house sustainability expertise. To ensure long-term impact, this must be coupled with a clear professionalisation strategy that transforms public procurement into a high-value career path with specialized roles in sustainability.

Actions

- Establish or designate a national GPP competence centre with a clear mandate to support contracting authorities at all levels (national, regional, municipal), aligned with the future PPA framework.

- Develop and maintain a library of standardised procurement documentation: model technical specifications, award criteria templates, contract clauses, and checklists for low-emission materials and circular procurement.
- Design and deliver regular training programmes for procurement officers. A few important areas could be lifecycle cost analysis, environmental product declarations (EPDs), carbon accounting and full-cost accounting tools, contract management for GPP, and market consultations.
- Develop a comprehensive professionalisation framework that recognizes GPP as a strategic, high-skill specialization, offering long-term professional development and advanced certification.
- Create formal career paths and specialized job profiles (e.g., Strategic Green Procurement Specialist) within public administration to attract top talent and ensure institutional retention of green expertise.
- Foster partnerships with universities and professional bodies to integrate green and strategic procurement into standard education curricula and professional degree programs, ensuring a continuous pipeline of skilled professionals.
- Create dedicated SME support services: help smaller suppliers understand and meet GPP criteria so they are not excluded from the market.
- Facilitate structured market engagement between contracting authorities and suppliers to improve understanding of market readiness, identify barriers, and support the development of low-emission solutions.
- Build a knowledge-sharing platform where contracting authorities can access case studies, peer learning, and expert advice — including from leading cities and regions within the country.

Key tools & references

- PIANOo — Dutch procurement expertise centre (model)¹⁶
- Swedish National Agency for Public Procurement (model)¹⁷
- ProcurCompEU – European Commission’s competency framework for public procurement professionals.¹⁸
- ISO 20400 — Sustainable procurement guidance standard¹⁹
- European Commission GPP helpdesk and training materials²⁰
- Basque Country Green Public Procurement Programme²¹
- French National network of incubators Greentech²²
- Catalonia Green Public Procurement Portal and guidance materials²³

4) Revise and harmonise technical standards for low-emission materials

Procurement criteria are only as strong as the technical standards they refer to. Where national norms implicitly favour conventional materials, they act as an invisible barrier to GPP. Ministries and relevant public contracting authorities must engage standards bodies, coordinate with

industry, and align national norms with EU-level frameworks to make procurement criteria legally defensible and market-credible.

Actions

- Audit existing national technical standards for key materials (cement, concrete, structural steel) to identify where they implicitly favour high-emission production methods or exclude low-emission alternatives.
- Initiate a revision process in cooperation with national standardisation bodies to revise standards for cement (clinker substitution ratios and new alternative low-carbon cements), concrete (revise national annexes of EN 206 to include new low-carbon concretes), and steel (electric arc furnaces with direct reduction of iron).
- Engage with EU Commission initiatives and standardisation bodies to ensure the EU upgrades the environmental product standards (CEN sub-committees, CPR acquis expert group, ESPR Ecodesign forums).
- Commission or support pilot projects with leading contracting authorities to test revised criteria in real procurement contexts before national rollout — using results to validate standards and build the evidence base.

Key tools & references

- Various sub-committees under CEN like CEN/TC/51(cement), CEN/TC/104 (concrete), CEN/TC/229 (precast concrete).²⁴
- ISO/TC 74 and ISO/TC 71 committees.
- CPR Acquis Expert Group.²⁵
- ESPR Ecodesign forums.²⁶

5) Apply full-cost accounting tools in tender evaluation

Public buyers should move beyond lowest-price approaches and select offers that deliver the highest long-term value, including environmental and societal benefits. The proposed revision of the Public Procurement Directives is expected to reinforce this by making best price-quality ratio (BPQR) the default award criterion, recognising quality, environmental performance, innovation and other strategic objectives as relevant elements in procurement decisions.

To make this approach effective, environmental performance (quality in BPQR) should be assessed through robust and transparent methodologies, particularly **Life Cycle Costing (LCC)** and life-cycle assessment approaches. These tools enable contracting authorities to consider not only the upfront purchase price, but also the full environmental and economic impacts associated with products, works and services over their entire lifecycle.

Where harmonised methodologies are available, contracting authorities should prioritise their use. In sectors such as construction, approaches based on Environmental Product Declarations (EPDs) and relevant standards (e.g. EN 15804) can provide reliable information on embodied carbon and other environmental impacts.

Digitalisation is a critical enabler in this process, serving as the primary tool to reduce administrative burdens and facilitate consistent implementation. Member States should complement LCC approaches with standardised, digital environmental accounting tools that

translate environmental impacts (such as CO₂ emissions or pollution) into monetary values. Centralised digital platforms—such as criteria tools—allow authorities to access, review, and update requirements frequently, ensuring that procurement remains aligned with the latest market innovations without requiring exhaustive manual research.

Examples such as the **Environmental Cost Indicator (MKI/ECI)** and the **CO₂ Performance Ladder** demonstrate how environmental performance can be incorporated into procurement decisions through measurable, verifiable and auditable criteria. These approaches provide clear market signals; reward suppliers investing in decarbonisation and support the transition towards low-carbon products and services.

Actions

- Adopt or adapt a full-cost accounting methodology for use in public tenders that expresses environmental impacts in monetary terms (such as the Environmental Cost Indicator / MKI in the Netherlands or a nationally developed equivalent).
- Apply the CO₂ Performance Ladder or an equivalent tiered certification scheme as an award criterion: contractors with higher certification levels receive a defined award advantage in tender scoring.
- Digitalize the verification of embodied carbon by integrating automated EPD databases and Digital Product Passports into e-procurement workflows to minimize the manual administrative burden for both buyers and suppliers.
- Ensure that prices used in these tools reflect full environmental and social costs — not just direct financial costs — so that the scoring genuinely differentiates between high- and low-emission offers.
- Train procurement officers in the use of these tools and provide standardised calculation templates (see Step 2 competence centre).

Key tools & references

- Environmental Cost Indicator (ECI / MKI)²⁷ — Dutch methodology.
- MVI Criteria Tool (Netherlands) — a digital platform for searching, applying, and reviewing sustainability criteria.²⁸
- CO₂ Performance Ladder²⁹ (SKAO, Netherlands)
- DuboCalc — shadow price calculation software
- Milieuprestatie Gebouwen (MPG) — mandatory for new buildings in the Netherlands
- One Click LCA, Tally, or equivalent LCA/LCC calculation tools

6) Set mandatory minimum environmental criteria in procurement documents

Full-cost accounting tools (Step 4) reward above-baseline performance; mandatory minimum criteria prevent the worst-performing products from competing at all. Both mechanisms are necessary: thresholds stop the race to the bottom, scoring drives continuous improvement.

Criteria must reflect market capability verified through Step 3 and be expressed in performance terms — not by brand or origin — to remain non-discriminatory.

To ensure that public procurement effectively contributes to climate and industrial objectives, minimum environmental criteria should become a standard element of procurement procedures, particularly for high-impact categories such as construction materials. A “comply or explain” approach would provide an effective balance between ambition and flexibility, requiring contracting authorities to apply ambitious environmental criteria where relevant or transparently justify deviations.

Criteria should be based on measurable environmental performance requirements — rather than specific brands, technologies or origins — ensuring compliance with EU procurement principles, maintaining competition and allowing suppliers to innovate. Requirements should reflect market capabilities, supported by market engagement and technical assessments, and should be progressively strengthened as markets evolve.

Actions

- Define and publish minimum environmental criteria for the principal material categories used in public construction, aligned with relevant sectoral legislation such as ESPR, CPR and future industrial decarbonisation requirements.
- Distinguish between project-level criteria (which allow flexibility in how environmental targets are met across the whole building project) and material-specific criteria (which set direct limits on high-environmental impact construction materials such as steel, cement or concrete).
- Set criteria at a level that excludes the most carbon-intensive options while remaining achievable by a competitive market — arrived at through pilot projects and preliminary market consultations. Adopt a “comply or explain” principle to provide written justifications to accommodate exceptions to the minimum environmental criteria.
- All criteria set and their evaluation process should be clear and proportionate to the level of environmental and social benefits from the criteria. (smaller benefits don't require elaborate criteria).
- Utilise whole life carbon limits (WLC), as required under the Energy Performance of Buildings Directive, but separate the limits for embodied carbon (covering construction materials) for use in public procurement. Setting ambitious WLC material carbon limits separately from the operational carbon emissions provides an easy to implement criteria for reducing the environmental impact of steel and cement in buildings.
- Provide long-term visibility on upcoming mandatory environmental requirements through a clear implementation roadmap to help SME and startup suppliers prepare for the new criteria.
- Ensure that operators submitting data can be verified using publicly available tools.
- Review and tighten criteria on a regular cycle (at minimum every 3 years) to track market improvement and progressively raise ambition. New construction products with lower carbon footprints are available in EPD databases³⁰ and comparators at the national and the global level. Contracting authorities must keep abreast of new benchmarks and innovations before reviewing criteria.

Key tools & references

- Buy Clean acts of the states of California, New York and Colorado in the USA following a legislative mandate model.³¹
- Ireland's restriction on CEM I cement for all public construction projects.³²
- Zurich's 25% recycled aggregate requirement for concrete in new buildings.³³

7) Launch flagship projects and strengthen public–private cooperation

Policy frameworks create the conditions for change; flagship projects demonstrate it. Pioneering projects generate concrete evidence that low-emission, responsible procurement builds supply-chain confidence and signals long-term demand. Public-private cooperation brings forward supply-side investment ahead of regulatory requirements. Regional cooperation in joint procurement is especially powerful for smaller member states — enabling pooled demand, shared risk, and faster learning.

Actions

- Identify and designate a set of flagship procurement projects at national or leading city/regional level that will explicitly demonstrate low-emission and circular material procurement in practice. Such projects can have more ambitious GPP criteria.
- Engage suppliers, construction companies, and material producers at the project design stage — before tender publication — to co-develop technically feasible and economically competitive solutions.
- Establish or join a public-private cooperation mechanism: a Green Deal–style voluntary agreement, a sectoral coalition (e.g. a concrete or steel accord), or a regional demand-aggregation initiative in which public buyers commit to joint procurement of low-emission materials.
- Use flagship project results to generate public evidence: publish carbon accounts, cost data (including lifecycle costs), and lessons learned to support the case that GPP is not costly and that the market is ready.
- Engage in regional or cross-border CEE cooperation initiatives to aggregate public demand at a scale that is meaningful for supply-chain investment decisions — particularly for smaller member states.

Key tools & references

- Betonakkoord (Netherlands) - concrete sector sustainability coalition³⁴
- National Bridge Bank (Netherlands) - platform for reusing bridges and bridge components³⁵
- Vienna material bank / material passport approach³⁶
- Tallinn Circular Economy Centre - serves as a model for circular procurement³⁷

8) Deploy financial incentives

Financial incentives reduce the cost premium for early movers and reward suppliers who invest in decarbonisation ahead of mandatory requirements. They are most effective as part of a coherent long-term signal: a binding target for climate-neutral public procurement, aligned with EU net-zero goals of 2050.

Actions

- Design and deploy financial instruments specifically linked to environmental procurement criteria: direct subsidies or co-financing for projects meeting advanced GPP standards; or tax relief for low-emission material procurement for green steel and concrete in public tenders.
- Introduce award bonuses or scoring advantages for suppliers certified under recognised emission reduction schemes – see the full-cost accounting tools from Step 4.
- Explore and deploy national credit mechanisms or green financing frameworks that reward verified environmental outcomes from public procurement — providing a financial incentive for both contracting authorities and their suppliers.
- Establish a progress-tracking mechanism reporting annually to parliament or equivalent accountability body — ensuring the climate-neutral commitment is politically durable across government cycles.
- Align financial incentive frameworks with EU cohesion funds, recovery funds, and state aid rules to maximise leverage and avoid duplication.

Key tools & references

- EU state aid frameworks – CEEAG and CISAF framework.
- EU Green Deal financial instruments – cohesion funds, InvestEU, Recovery and Resilience Facility

What works in practice: European examples of strategic Green Public Procurement

Below are multiple examples of best practices for green public procurement in Europe. These examples show that ambitious green procurement measures are possible and are already working in practice. The examples focus on construction and infrastructure, as these sectors have the biggest impact on the use of steel and cement. However, useful examples aimed at public procurement in general are also included. Elements from these best practices can be used for enhancing procurement legislation at a national, regional or local level.

1. The Netherlands (national tools and standards)

What has been done:

The Netherlands implemented the **CO₂ Performance Ladder**, a voluntary certification system where higher levels grant suppliers a predefined award advantage in tenders. Additionally, they use the **Environmental Cost Indicator (ECI)**, which monetises environmental impacts into a single shadow price. The use of this indicator (called MKI in Dutch) is voluntary, but plans are being made to make it mandatory for bigger construction works.

Benefits:

These tools provide a transparent, auditable framework that rewards voluntary emission reductions. The planned revision of the ECI will make it mandatory to set minimum requirements for the environmental impact of asphalt, steel and concrete. This would prevent products with a high climate impact from entering public tenders.

2. Ireland (national material mandates)

What has been done:

Effective from September 2024, Ireland introduced ambitious mandates for all public and state construction projects. These include a requirement for at least 30% clinker substitution for concrete products, the mandatory use of verified Environmental Product Declarations (EPDs), and strict restrictions on the use of carbon-intensive CEM I cement. To support these mandates, public procurers utilize quality-focused award criteria available at the dedicated national GPP Criteria Search³⁸ and have pioneered carbon-management tools, such as piloting the CO₂ Performance Ladder on the M7 Kildare Bypass infrastructure project.³⁹

Benefits:

This policy provides a decisive market signal across the entire country, accelerating the adoption of low-carbon binders and ensuring that environmental transparency becomes the standard for the entire domestic construction supply chain. Data shows that only 11% of contracts are awarded on price alone,⁴⁰ while healthy market competition is also maintained, with only 21% of tenders receiving a single bid⁴¹ — proving that strict green criteria don't exclude suppliers.

3. Portugal & Slovenia (national strategy for Green Public Procurement)

What has been done:

Portugal: In 2023, Portugal strengthened its GPP framework through the ECO360 strategy and Resolution 132/2023⁴², which introduced mandatory, recommended and optional ecological criteria for all public procurement authorities. For public works, the framework ensures reused or recycled construction materials as a mandatory award criteria. It also requires the inclusion of technical specifications in a contract, to promote construction materials with lowest environmental impacts, waste prevention, reuse and recycling of construction and demolition waste. The framework includes criteria addressing low- or zero-carbon concrete and steel, although these are currently optional. ECO360 further establishes measurable national targets for 2030, including 20% circular materials in the mass of materials procured by public authorities and the integration of carbon-footprint information into 100% of public procurement processes.

Slovenia: The Green Public Procurement policy of Slovenia sets mandatory environmental criteria for 22 different product groups.⁴³ Most relevant for steel and concrete are the requirements for the construction of buildings. It is mandatory that the proportion of timber or timber-based products incorporated into the building is at least 30 % of the volume of materials used. Other sustainability measures are optional but can lead to more points in tenders. Using timber stores carbon directly in the building, while at the same time lowering the need for emission-intensive steel and concrete. The policy includes requirements for the sustainability of the timber that is used.

Benefits:

Portugal: The GPP framework shows how public procurement can move beyond voluntary approaches by combining mandatory criteria with measurable national targets, including requirements for recycled and reused materials and life-cycle environmental performance in public works. Given the scale of Portuguese procurement — almost €25 billion in contracts were awarded in 2025⁴⁴ — effective implementation could create significant demand for lower-impact and circular construction materials. However, procedures involving environmental criteria represented only 1.8% of total procurement value in 2025, rising to around 5% for open procedures. While these figures do not constitute an evaluation of ECO360, they highlight the importance of monitoring implementation and ensuring that GPP criteria translate into actual market uptake and environmental outcomes.

Slovenia: The environmental-, economical- and social impacts of GPP are evaluated in detail on a regular basis.⁴⁵ Between 2021 and 2024, these policies have led to over 2.5 TWh of electricity savings, a reduction of water usage of more than 16 million cubic meters and about 867 thousand tonnes of avoided CO₂ emissions.⁴⁶ For now, using timber in construction plays a minor role with an estimated 2.4 thousand tonnes of CO₂ emission reduction over a ten-year period. This is however not the only benefit; a positive economic impact and many positive social impacts are reported as well. Although the effects of GPP are generally positive, there is room for improvement. The climate-, environmental- and social effects of using timber are hugely dependent on strict requirements and monitoring, which should be properly addressed in any policy stimulating the use of biobased materials. Slovenia can improve on this as well, for example through stronger requirements on embodied carbon.

4. Vienna and the Netherlands (circular buildings and material banks)

What has been done:

Vienna: During the construction of 3,000 new housing units, the city involved experts at the very beginning of the building life cycle to ensure circularity. The project focused on supplying salvaged components and using buildings as "material banks".⁴⁷

The Netherlands: The national public works authority (Rijkwaterstaat) established the national bridge bank in 2021, together with the cities of Amsterdam, Rotterdam and the Dutch Bridge Foundation, creating a marketplace for reusable bridge components across the country.⁴⁸

Benefits:

Vienna: The city successfully recovered, cleaned, and crushed one million tonnes of excavated soil and aggregates on-site. This significantly reduced the demand for virgin materials and eliminated the environmental costs associated with the transport and disposal of construction waste.

The Netherlands: The bank achieved its first project in 2023, when concrete girders from a viaduct on the A9 motorway were reused in a new bridge on a regional road (N201). Reusing girders requires more effort than traditional construction methods, but the benefits are significant: up to 97% CO₂ savings compared to new girders, and fewer raw materials used.⁴⁹ By 2030, Rijkwaterstaat targets 80% reuse of bridge components.⁵⁰

5. Barcelona (sustainability protocol for a metropolitan region)

What has been done:

The Sustainability protocol for the Metropolitan Area of Barcelona (AMB) was established in 2019 and is aimed at promoting sustainable public procurement practices in building and public space design. It sets nineteen mandatory environmental criteria for a wide range of topics, including energy and water consumption, proactive rainwater management, human

comfort, biodiversity and circularity. The protocol is the first document in Spain to set limits on embodied carbon emissions.

It has two unique features:

- It sets embodied carbon limits for buildings and infrastructure, but only for construction materials, their transport and the construction process emissions, excluding operational energy use.
- It prioritises renovation over new building, by first questioning whether there is a genuine need for a project to be new construction.^{51 52 53}

Benefits:

A 2024 study⁵⁴ of two renovation projects following this protocol concluded that the criteria have helped reduce emissions from annual energy consumption by 78.2%, along with the reuse of materials, structural elements, rainwater and groundwater. The plan has completed over 400 initiatives with a €200 million investment in 2020-23 and has allocated €150 million for 2025-28.

6. Zurich and Berlin (city-wide implementation)

What has been done:

Zurich: The City of Zurich introduced a requirement 20 years ago for a minimum 25% share of recycled aggregates in concrete used in new buildings. Since 2013, it has favoured the use of CEM III/B cement with a significant SCM content. Between 2016 and 2021, concrete made with CEM III/B cement accounted for approximately two-thirds of total concrete consumption, and since 2020 this share has increased to as much as 80%.

Berlin: The city of Berlin revised its procurement laws in 2020 (BerLAVG)⁵⁵ and updated its environmental procurement regulation in 2021 (VwVBU⁵⁶, applicable above cost of € 500,000). Under the new regulations, all public construction projects must use recycled aggregates in concrete (25-45% based on Dafstb standards⁵⁷); educational, office and laboratory buildings costing more than € 10 million and outdoor areas over € 500,000 must get a BNB silver certification (but not mandatory on embodied carbon).

Benefits:

Zurich: A specific case study on the construction of a school in Zurich, conducted by Ramboll, reports that these requirements led to a 17% reduction in emissions with only a minimal 1% increase in costs.⁵⁸

Berlin: Apart from environmental standards, the sustainable procurement act covers fair wages, women's advancement and social justice. The 2024 evaluation⁵⁹ indicated an overall positive perception of BerLAVG among contracting authorities and contractors. However, as outcomes were not systematically measured due to an underdeveloped monitoring and reporting system, there are no documented results demonstrating increased procurement of low-carbon steel or concrete. Over 62% of contracting authorities stated that they were obliged to follow the technical criteria from the associated environmental procurement regulation- showing the success of comply or explain type legal mechanisms that are embedded in the law.

7. Euskadi (mandatory secondary materials in public construction)

What has been done:

Euskadi (Basque region) has a long-standing track record in GPP, dating back to 2002. The Euskadi GPP Programme 2030⁶⁰ provides a framework for using public procurement as a lever for environmental transformation. The construction sector (over 40% of Euskadi procurement) is one of the programme's key areas of action. The programme provides green procurement criteria for 31 products and services, including nine construction-related subcategories. These criteria are organised across three levels of excellence and include ready-to-use text that can be directly incorporated into tender documents⁶¹. After several years of using non-mandatory criteria, Euskadi moved towards binding requirements in 2021, establishing requirements for the use of secondary raw materials in construction.⁶² The law requires construction tender documents to specify the use of by-products, secondary raw materials or recycled materials, setting a minimum requirement of 40%, unless technically justified otherwise. The legislation also requires appropriate monitoring mechanisms to support compliance during contract execution, including documentary evidence of the use of the required materials. Since 2021, a Basque Government technical instruction⁶³ has made the inclusion of basic environmental criteria mandatory in public procurement processes for priority categories, including building, urban development, and civil works and infrastructure.

Benefits:

The Euskadi model demonstrates how GPP criteria can be translated into standardised and enforceable requirements in public procurement. The mandatory 40% requirement for recycled materials and secondary raw materials contributes to creating more predictable demand for these materials, while the availability of ready-to-use technical criteria that facilitates their application by contracting authorities. The combination of technical criteria, legal requirements and monitoring mechanisms provides a solid basis for translating environmental objectives from the tendering stage into contract implementation. Euskadi also has a structured monitoring and evaluation framework, although the systematic measurement of environmental outcomes is not yet fully developed. The 2021–2025 programme evaluation⁶⁴ identifies strengthening the measurement of environmental and economic impacts as a priority for the next cycle.

Final remarks

The transition towards low-carbon industrial production will depend not only on technological innovation, but also on the creation of predictable markets capable of accelerating investment and scaling clean solutions. Public procurement is one of the most powerful instruments available to governments to create these markets. Focusing on steel and cement production will address industries that are of strategic importance, but currently highly polluting.

Europe is entering a decisive phase in which climate policy, industrial competitiveness and strategic autonomy are increasingly interconnected. The forthcoming evolution of the EU public procurement framework, together with sectoral legislation such as the IAA, CPR and ESPR, will progressively reshape how public authorities purchase and how industries compete. However, regulatory change alone will not be sufficient. Effective implementation will depend on Member States building the institutional capacity, technical expertise and market confidence needed to translate ambition into practice.

Acting early provides clear advantages. Countries that establish ambitious green procurement frameworks today will enable their industries to adapt gradually, reduce transition risks and position themselves at the forefront of emerging low-carbon, competitive markets. Conversely, delaying action risks transforming future regulatory requirements into a compliance burden rather than a strategic opportunity.

The experience of frontrunner regions and countries demonstrates that ambitious procurement policies are feasible. From lifecycle-based evaluation tools and embodied carbon requirements to material mandates and public-private partnerships, successful approaches already exist and can be replicated and adapted across Europe.

The current policy window offers a unique opportunity. By embedding sustainability, innovation and industrial objectives into procurement decisions, Member States can ensure that public expenditure does more than purchase goods and services: it can actively shape Europe's industrial future.

Green Public Procurement should, therefore, be understood not as an additional environmental requirement, but as a strategic investment in Europe's competitiveness, resilience and long-term economic security.

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