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POLICY BRIEF

Simpler and More Sustainable

How to reform the European Union's procurement directive to foster robust tools for green public procurement

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Introduction: A critical time for better procurement rules

In 2024, the European Union (EU) initiated a reform of its public procurement framework,[1] making procurement law part of its evolving strategic agenda. This reform—shaped by the Letta (2024) and Draghi reports (2024)—emphasizes the need to enhance competitiveness and innovation, make procurement processes simpler and more flexible, improve resilience, increase transparency, and improve small and medium-sized enterprise (SME) access in procurement processes. SMEs are vital to the EU's economy. While SMEs account for 99% of EU businesses, they represent only 33% of the total value of contracts awarded between 2011 and 2017 (European Commission, 2017), suggesting that SMEs mainly participate in lower-value contracts and face barriers to larger procurement opportunities. Against this backdrop, the reform presents a timely opportunity to reconsider how procurement frameworks can better support the green, circular, and social transition.

Public procurement accounts for an estimated 14% of the EU's GDP, making it one of the most powerful levers for driving the green transition (European Court of Auditors, 2023). It also has a significant environmental footprint: an estimated 11% of the EU's greenhouse gas emissions result from public procurement decisions (Mähönen et al., 2023). While robust tools[2] for implementing green public procurement (GPP) exist, challenges remain under the current directives. Legal uncertainties, fragmented rules, and administrative burdens have discouraged their uptake, while limited capacity among procurers further slows progress (Andhov et al., 2020; Nordic Council of Ministers, 2017; Ranganathan & Thiemann, 2025).

[1] The EU Public Procurement Directives to include the Directives 2014/23/EU, 2014/24/EU and 2014/EU and 2014/25/EU.

[2] In this brief, we focus on tools such as ecolabels, environmental management systems, and life-cycle costing tools, rather than on GPP or sustainable public procurement criteria developed at various administrative levels.

This brief discusses how new public procurement directives can create a stronger enabling environment for these tools and simplify the implementation of GPP.

Unlocking the Benefits of GPP Through Practical Tools

GPP is more than a compliance measure. It is a strategic lever for achieving both environmental and economic objectives. The European Commission (2008) defines GPP as a "process whereby public authorities seek to procure goods, services and works with reduced environmental impact throughout their life cycle when compared to goods, services and works with the same primary function that would otherwise be procured" (p. 4). For more than a decade, the EU has promoted GPP as a way to ensure that public spending supports sustainability objectives.

By embedding environmental criteria into purchasing decisions, GPP can accelerate the shift toward low-carbon, resource-efficient production while driving innovation and market transformation. It offers governments a way to align public spending with climate and sustainability commitments, delivering tangible impacts through everyday procurement choices.

Potential benefits are most significant in high-impact sectors, like defence, transport, and construction, which contribute heavily to greenhouse gas (GHG) emissions and resource consumption. In the EU, for example, building operations account for at least 36% of GHG emissions from the energy sector, roughly 50% of all extracted materials, and over 35% of total waste generation (Shifting Paradigms, 2023). Evidence from the construction sector shows that integrating GPP criteria can deliver measurable reductions. In the Netherlands, an estimated 19.7 kilotonnes of carbon dioxide equivalent (CO_2e) emissions were avoided in 2019–2020 through the application of GPP in public office building projects (Steinmann et al., 2024). Similar pilot projects, such as the Allmend School in Zurich, demonstrate that applying carbon criteria in procurement can substantially cut embodied emissions compared to conventional approaches (Steinmann et al., 2024).

Greener procurement across these high-impact sectors, such as specifying low-carbon materials in infrastructure, integrating circular design principles into public buildings, or incentivizing cleaner technologies in transport and defence, can cut life-cycle emissions, reduce waste and operating costs, improve air quality, create green jobs, and strengthen Europe's competitiveness in global markets for sustainable products.

Yet, turning this potential into reality requires more than policy ambition. A key enabler is the provision of practical tools that support procurers in implementing GPP effectively. However, not all tools are equally robust, as explained in Box 1 on the importance of third-party verification.

Box 1. Third-party verification as a safeguard for robust GPP

Not all tools used in GPP are equally robust. Self-declarations, such as supplier statements claiming compliance with environmental standards or documents asserting the recycled content or energy efficiency of products without independent verification, can be simpler for companies but are often difficult to verify and inconsistent across bids, in addition to exposing procurers to the risk of greenwashing (McLennan, 2024). By contrast, third-party verified labels, such as type I ecolabels and certifications, are independent, transparent, and reliable. They

- increase the likelihood of higher environmental performance and compliance with clear standards,
- reduce the verification burden on procurers by providing ready-made proof, and
- give companies clarity, allowing them to use the same certification across multiple bids instead of preparing new evidence each time.

Research highlights that third-party ecolabels are an efficient way to integrate life-cycle thinking into procurement and can "help to save time while ensuring that high environmental standards are applied" (European Commission & ICLEI – Local Governments for Sustainability, 2016). This assurance is particularly valuable in contexts with limited capacity or fragmented procurement systems (Ramsden & Grafl, 2021).

For GPP to work in practice, procurers need access to tools they can trust. For instance, leveraging existing criteria and verification methods from trusted ecolabels and certifications can significantly reduce the costs and complexity of defining sustainability requirements (EcoAdvance & One Planet Network, 2024). Such tools also offer valuable market intelligence: procurers can gauge market readiness and identify sectors where supply can meet demand by examining the availability of certified products and services (EcoAdvance & One Planet Network, 2024). For example, procurers in Germany can compare the underlying requirements of various ecolabels with companies offering certified products in a dedicated online platform (Kompass Nachhaltigkeit, 2025).

Importantly, these tools can provide unified and comparable systems that benefit both procurers and suppliers. When multiple contracting authorities use standardized tools and criteria, companies can prepare compliance documentation once and apply it across multiple tenders, rather than having to tailor their responses to bespoke sustainability criteria written by each individual procuring authority.

With the right tools, GPP can move from being technically possible to actively enabled. Table 1 provides an overview of tools that are considered helpful for GPP, ranging from ecolabels to carbon management systems and cost calculators. These robust tools can help contracting authorities verify claims, compare products, and integrate sustainability into procurement decisions.

Table 1. Robust tools that support GPP implementation

Category	Examples	Description	Scope
Type I Ecolabels	Blue Angel, Nordic Swan, EU Ecolabel, Fair Trade	These labels follow ISO 14024[3] standards and are scientifically rigorous and third-party verified. They help procurement officers trust environmental claims and are frequently referenced in GPP guidance.	Primarily used for products, though some apply to services
Type I-like or single-criterion ecolabels	Energy Star, Forest Stewardship Council (FSC), Programme for the Endorsement of Forest Certification (PEFC), EU Organic label	Similar to Type I, but these focus only on one environmental aspect, such as energy efficiency or sustainable forest management	Product specific, with limited application to services
Type III Environmental declarations	Environmental Product Declarations (EPDs)	These follow the ISO 14025 standard and provide EPDs with verified, quantitative life-cycle data. They do not rate sustainability, but they do allow objective comparison between products.	Product level, widely used for construction materials and works
Environmental management systems	EMAS, ISO 14001[4]	These certify that an organization has a structured framework for continuous improvement in environmental performance.	Organization wide, applicable to suppliers providing goods, services, and works

[3] The ISO 14020 series establishes principles and procedures for environmental labels and declarations. ISO 14024 defines the requirements for Type I ecolabels, which are awarded by an independent third party based on multiple environmental criteria. ISO 14025 covers Type III EPDs, which present verified life-cycle data without assigning a rating.

[4] ISO 14001 is an international standard specifying requirements for an environmental management system. It provides a framework that organizations can follow to manage environmental responsibilities in a systematic manner.

Category	Examples	Description	Scope
Carbon and energy management systems	CO_2 Performance Ladder	This tool helps organizations or projects measure, reduce, and manage carbon emissions. It can be used in procurement to demonstrate carbon reduction commitments, verify performance against climate targets, and incentivize suppliers to adopt more ambitious decarbonization strategies.	Organization and project level, applicable to goods, services, and works
Cost calculators	Life-cycle costing calculators, total cost of ownership calculators	These tools assess a product's or service's total financial and environmental cost over its life cycle. They help procurers compare options on purchase price and long-term costs, such as energy use, maintenance, and disposal.	Applicable to products, services, and works

Source: European Commission & ICLEI, 2016; Kadefors et al., 2020; McLennan, 2024.

Challenges in Using GPP Tools

While the current EU public procurement directives allow the use of GPP tools, such as ecolabels, environmental management systems, and life-cycle costing, their application in practice remains limited. Figure 1 identifies four recurring challenges: knowledge gaps and limited capacity, legal uncertainty, administrative burden, fragmentation, cost concerns, SME participation, and competition (Andhov et al., 2020; ICLEI Europe, 2025; Nordic Council of Ministers, 2017; Ranganathan & Thiemann, 2025).

Figure 1. Challenges in applying GPP tools

Source: Authors' diagram.

Knowledge Gaps and Limited Capacity

A major barrier to the effective use of GPP tools in the EU is the limited capacity of procurement professionals to apply them in practice. A recurring challenge is the limited environmental and market knowledge among procurers. Many lack awareness of the variety of available ecolabels, environmental management systems, and standards, as well as the environmental aspects most relevant to specific product or service categories (Nordic Council of Ministers, 2017).

Beyond awareness, many contracting authorities, particularly at regional and local levels, also lack the technical expertise to evaluate environmental impacts across categories. This often makes them default to price-based decisions rather than sustainability-oriented ones (CIRCUIT Project, 2025). Capacity constraints also manifest in weaknesses at the evaluation and contract management stages. As Wójtowicz-Dawid (2023) notes, contracting authorities often lack the skills to verify environmental requirements during bid evaluation and contract execution, leaving them vulnerable to greenwashing. The Organisation for Economic Co-operation and Development's (OECD's) *ProcurCompEU* survey of 555 public procurement officials found that integrating environmental considerations requires professionals to master complex skills, such as life-cycle costing and carbon footprinting—areas where many still lack expertise (OECD, 2025a). Several member states, including Malta, Estonia, and Portugal, have begun to address these gaps through national training programs and qualification schemes that aim to professionalize public procurement (OECD, 2023, 2025b). However, such initiatives remain fragmented across the EU, and systematic capacity building is still needed to make GPP implementation consistent and effective.

Practical Challenges and Perceived Legal Risks in Applying Environmental Criteria

Although Directive 2014/24/EU clearly allows environmental considerations in procurement, many contracting authorities remain hesitant to apply them ambitiously (European Parliament, & Council of the European Union, 2014). This hesitation stems less from legal ambiguity in the directive itself and more from difficulties in demonstrating the required link between sustainability criteria and the subject matter of the contract.

The requirement that sustainability criteria must be linked to the subject matter of the contract often proves difficult to demonstrate in practice (Andhov et al., 2020; Janssen & Caranta, 2023). While the directive allows this link to cover not only the product or service itself but also production processes and life-cycle stages, contracting authorities often struggle to demonstrate a sufficiently direct connection. This becomes particularly challenging when using comprehensive type I ecolabels, such as the Blue Angel, which cover a wide range of environmental requirements. Many of these requirements—for example, restrictions on hazardous substances, energy efficiency in production, or waste management practices—may not all directly relate to the specific subject matter of the contract. As a result, authorities are typically permitted to request compliance with certain relevant requirements from such ecolabels but not to demand the entire label as a condition. This uncertainty discourages the ambitious use of green criteria, as procurers fear that comprehensive requirements may be challenged or seen as disproportionate (Lazo Vitoria, 2023).

This concern also appears in contributions to the European Commission's public consultation about the procurement directives. For instance, the City of Stockholm (2025) noted that "it should be ensured that contracting authorities are given the opportunity to impose relevant and proportionate requirements through recognised labels, even if these impose requirements on the overall environmental performance of the supplier" (p. 3; author's translation)

There is also a note that the Most Economically Advantageous Tender (MEAT) principle adds to legal ambiguity, as some authorities interpret the emphasis on "economic" narrowly, discouraging the use of criteria that go beyond procurement based on the lowest purchase price (ICLEI Europe, 2025).

Administrative Burden and Fragmentation

Tools like ecolabels and certifications have the potential to simplify GPP by providing ready-made environmental criteria and verified proof of compliance, as seen in tools such as the CO_2 Performance Ladder that offer standard procurement texts (SKAO, 2025). However, using them within the EU procurement framework often requires extra effort from procurers.

Contracting authorities must confirm market availability, check that any referenced label meets Article 43(1) conditions, draft legally compliant clauses, and set up procedures to assess alternative evidence for equivalence. These steps are necessary, but they mean that simply citing a label does not substantially reduce the labour of setting criteria or verifying sustainability claims (ICLEI Europe, 2025). Because each authority repeats these checks on its own, efforts are duplicated and practices diverge across member states (Ranganathan

& Thiemann, 2025). This fragmentation also creates challenges for suppliers, who must repeatedly prepare and update documentation or equivalent evidence to meet varying national requirements, adding a significant cumulative burden across the market.

The equivalence obligation adds further complexity. To avoid restricting competition, procurers must accept proof that is equivalent to the specified label or standard. In principle, the tenderer provides this proof; in practice, the authority still has to evaluate it to reach a decision. Available standards are fragmented and lack common or harmonized benchmarks, making comparisons difficult and resource intensive (Nordic Council of Ministers, 2017; Ranganathan & Thiemann, 2025). The growing volume of certifications adds to this workload; for example, the EU Ecolabel now covers more than 100,000 goods and services (Directorate-General for Environment, 2025), which improves market coverage but increases the comparison effort when assessing equivalence across overlapping schemes.

Feedback from the European Commission's public consultation echoes these challenges. For example, the Central Project Management Agency of Lithuania (2025) explained:

> the assessment of a proposal's compliance with environmental and social criteria requires specialists with a high level of expertise, which contracting authorities, particularly small contracting authorities, simply do not have.… It is proposed that the Directive should include measures to reduce the burden on contracting authorities to assess compliance with environmental and social criteria. (Authors' translation)

Cost Concerns, SME Participation, and Competition

Using GPP tools, such as ecolabels or certifications, requires significant time and resource investment from suppliers. Obtaining an ecolabel typically involves third-party verification by accredited institutions, extensive documentation, and compliance with detailed criteria. This process can be lengthy and costly, requiring specialized testing equipment and laboratory infrastructure that may be limited or expensive in some contexts (Prakash et al., 2021). In addition to certification fees, annual renewal costs further add to suppliers' expenses, particularly when market demand for ecolabelled products remains low (Prakash et al., 2021).

For SMEs, applying for ecolabel certification can be a high-risk investment, as the costs of preparing documentation and undergoing verification occur before the tendering stage and will only be recouped if the company wins the contract. This can deter SMEs and start-ups from participating in sustainable tenders (ICLEI Europe, 2025; Ihamäki et al., 2023). In practice, however, these costs are often less prohibitive than assumed and are structured to be proportionate to company size and turnover. For instance, the EU Ecolabel charges a usage fee equivalent to 0.15% of a product's annual turnover in the European Economic Area, while the German Blue Angel ecolabel applies graduated annual fees based on total yearly sales (Prakash et al., 2021). Similarly, the CO_2 Performance Ladder operates on a scaled annual contribution model linked to company turnover, with caps to prevent excessive fees even for large corporate groups (SKAO, n.d.). These examples show that certification costs can be manageable when proportionally designed and communicated transparently.

The inclusion of private standards or labels can also restrict competition. When label requirements exceed harmonized or widely recognized standards, they risk becoming discriminatory toward suppliers without certification (Covaglia, 2016). Yet, low competition in public procurement is not solely linked to sustainability criteria; it reflects broader structural challenges. The Letta report, drawing on European Court of Auditors' findings, highlights a steady decline in competition for public contracts across the EU over the past decade, with limited gains in SME participation (Letta, 2024). This points to complex procedures and disproportionate administrative burdens as key barriers to competition. Moreover, public procurement is not utilizing the full potential of the EU single market. Most tender documents are published only on national or regional platforms and accept documents solely in national languages, limiting cross-border participation.

Use Cases of GPP Labels and Certification Schemes

Despite the challenges outlined before, many EU authorities already use robust tools to good effect. The cases below show how GPP tools, like ecolabels, environmental declarations, carbon management systems, and life-cycle costing, can streamline tender design and verification, reduce emissions, and improve value for money. They illustrate that, when applied with proportionate requirements and clear evidence rules, these tools are practical and scalable, delivering measurable results.

EU Ecolabel

The EU Ecolabel, the EU's official certification scheme for non-food products and services of environmental excellence, supports GPP by providing ready-made technical specifications, reducing verification effort, and offering a product catalogue that helps contracting authorities quickly identify compliant goods and services (European Environmental Bureau, 2024). By combining the EU's voluntary GPP criteria with the EU Ecolabel, procurers can cut the time needed to design tenders and rely on independent third-party verification rather than duplicating checks themselves (European Environmental Bureau, 2024).

For instance, in the City of Ghent (Belgium), a 4-year cleaning product framework required all items to meet EU Ecolabel criteria (or equivalent), alongside cradle-to-cradle products, refill systems, and packaging take-back. Through this approach, Ghent secured recyclable packaging with high recycled content and smart dosing systems that reduced waste and resource use (European Commission, 2017).

Environmental Product Declarations in Ireland

Ireland's Office of Public Works (OPW) Furniture Division placed EPDs at the core of a GPP call for carpet tiles. Building on market engagement that highlighted the value of third-party-verified EPDs, the OPW required suppliers to submit valid declarations under ISO 14025 and EN 15804, set maximum global warming potential (GWP) limits by pile weight, and used GWP as a major award criterion, with more points for more climate-friendly offers. By

using EPDs in this way, the OPW made GWP the key factor in choosing the winning bid. This approach automatically ruled out products with higher impacts and led to much lower emissions than in earlier tenders that did not include EPDs or GWP limits (Environmental Protection Agency, 2025).

CO_2 Performance Ladder

The CO_2 Performance Ladder, managed by the SKAO, is both a procurement instrument and a carbon and energy management system.[5] When used as a GPP instrument, it provides certified organizations with an award advantage in tenders while requiring them to measure and reduce emissions. Used in the Netherlands for over 15 years, the CO_2 Performance Ladder has proven credible and accessible, combining independent verification with a framework that ensures credibility and is applicable to companies at all stages of climate action.

Research confirms its broader influence: a 2025 Utrecht University study found that organizations holding a CO_2 Performance Ladder certificate are significantly more likely to include more climate targets in their tenders, as the obligation to report publicly fosters transparency and higher ambition, effectively serving as a mirror for their own practices (Nicolas & Schotanus, 2025). Recent research also indicates that using the CO_2 Performance Ladder in public procurement is contributing to reductions in local emissions (Ryu et al., 2025). Beyond the Netherlands, Belgium's pilot phase resulted in more than 20 projects and over 60 certifications, with both contracting authorities and companies reporting emission reductions, stronger climate awareness, and no added costs, prompting Flemish authorities to adopt the CO_2 Performance Ladder structurally from 2025 (SKAO, 2024). In Ireland, the first pilot, a motorway resurfacing tender, achieved a 21% CO_2 reduction, demonstrating the CO_2 Performance Ladder's transferability and value as a robust tool for sustainable procurement (SKAO, 2025).

Sustainable School Meals With Fair Trade and Organic Products

In countries like Italy and France, numerous municipalities prioritize the procurement of sustainable and nutritious school meals. In many cases, organic food accounts for between 30% and 100% of the menus, including the use of fair trade items and sustainably sourced seafood (EU Food Policy Coalition Public Procurement Task Force, 2021).

For instance, the Dordogne Department in France has pioneered the 100% Organic, Local, and Homemade School Food Project to transform food provision in secondary schools. Supported by ECOCERT en Cuisine certification, which rewards organic, local, fair trade, and minimally processed products, the initiative ensures high-quality meals.[6] By 2024, all secondary schools in the department had gained ECOCERT certification, with nine out of 20 procuring 100% organic food and sending a clear demand signal for sustainable agriculture.

[5] See more of the CO_2 Performance Ladder here: https://www.co2performanceladder.com/

[6] See more on ECOCERT en Cuisine here: https://www.ecocert.com/fr/certification/referentiel-en-cuisine

The project has delivered these results without significant extra costs (total costs of EUR 1.80–2.10 per meal) and achieved tangible benefits, such as staff professionalization , stronger stakeholder collaboration, and reduced food waste (Vola et al., 2025).

Total Cost of Ownership in Denmark

The Danish Environmental Protection Agency has developed total cost of ownership (TCO) calculation tools to guide public procurement.[7] These tools include PDF guides and spreadsheets, and a newer digital TCO tool for specific product groups. They enable public entities to assess all costs associated with a product throughout its entire life cycle, moving beyond the initial purchase price to include operational costs, maintenance, disposal, and even the valuation of external environmental impacts. This approach aims to identify the most economically advantageous and environmentally friendly solutions, looking beyond the initial purchase price.

For example, the University of Copenhagen used the TCO calculation when purchasing ultra-cold freezers for its laboratories (Den Ansvarlige Indkøber, 2025). By considering the energy use of the freezers, the university managed to save between DKK 14 million and DKK 28 million over 4 years. In addition, buying the more energy-efficient freezers reduced CO_2 emissions over 15 years by 3,000–6,000 tonnes of CO_2.

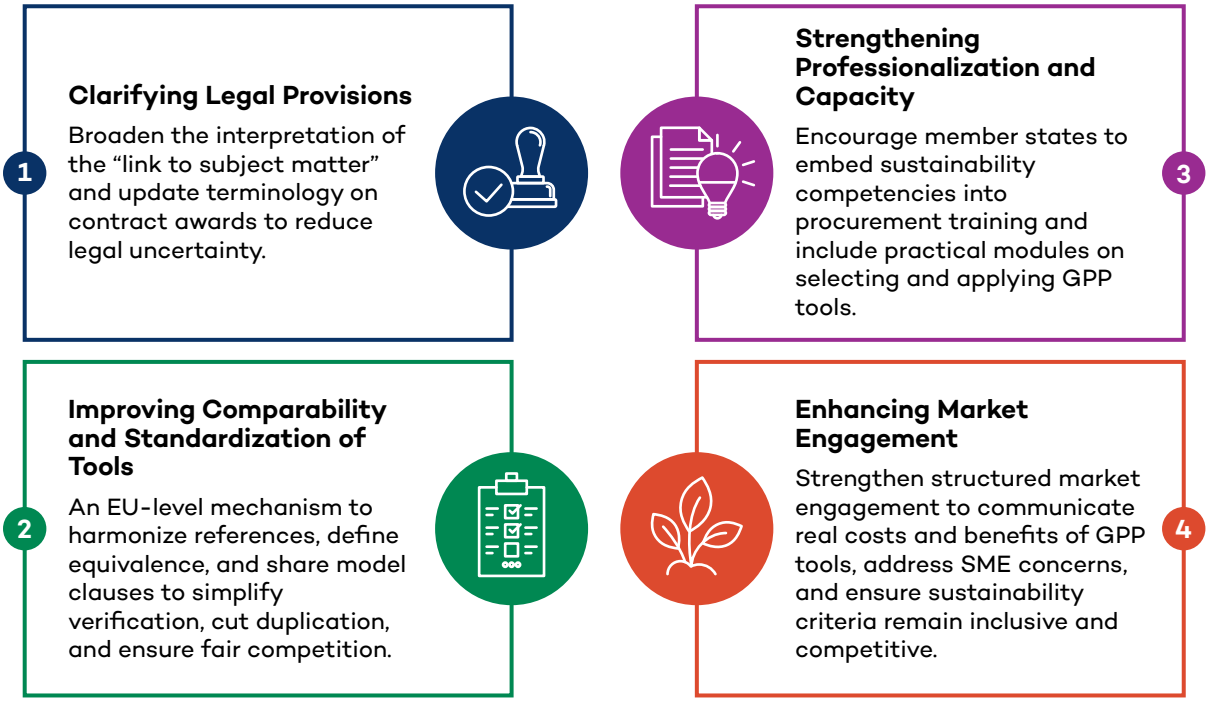
In the transportation (cars) sector, the TCO calculator helps to look beyond the cheapest purchase price. For example, a leased gasoline car may appear to be the cheapest choice based on purchase price or traditional TCO, but a purchased electric car can be the optimal solution when a full environmental TCO is applied, which values external environmental impacts. Specifically, purchasing an electric car could reduce the total annual cost by around 30% compared to a gasoline car (Miljøstyrelsen, 2020).

Opportunities in the Revised Directives for the Stronger Use of GPP Tools

The ongoing reform of the EU public procurement directives provides a window of opportunity to strengthen the role of GPP tools in driving the green transition. The following recommendations focus on specific legal and practical adjustments that would directly support their uptake.

[7] See more on TCO in Denmark here (in Danish): https://www.ecocert.com/fr/certification/referentiel-en-cuisine

Figure 2. Opportunities in the revised directives for the stronger use of GPP tools



Source: Authors' diagram.

Clarify and Simplify Legal Provisions

The revised public procurement directives should broaden the interpretation of the "link to subject matter" requirement so that contracting authorities may include environmental and social criteria at the organizational level. The current strict interpretation of this requirement discourages comprehensive green requirements by limiting the criteria to the immediate deliverables of a contract. Research suggests that relaxing, or even omitting, the strict link to subject matter could allow contracts to be awarded based on criteria at the organizational level, thereby significantly enhancing social value creation (Nicolas, 2025). This shift could empower public buyers to pursue a wider range of economic, environmental, and social benefits for communities, moving beyond narrow contractual outputs.

Another option worth considering is clarifying the award terminology. The United Kingdom's Procurement Act 2023 provides a precedent by replacing the MEAT principle with the "most advantageous tender" (Cabinet Office, 2025). The adjustment highlighted that tenders do not have to be awarded on the basis of the lowest price, nor should cost always take precedence over non-price factors. Since the new regime went live, the share of lots using quality criteria in open procedures has risen from 48.3% in February to 72% in May 2025, indicating a clear behavioural shift toward evaluating tenders on broader value considerations (Open Contracting Partnership, 2025). A similar provision in the directive might help contracting authorities apply sustainability criteria with greater confidence, ensuring that value for money reflects not only financial efficiency but also environmental and social performance.

Improve the Comparability and Standardization of Tools

Greater comparability and standardization of GPP tools are essential to make them practical, credible, and easy to apply across the EU. The current fragmentation of ecolabels, certifications, and verification methods often leads to administrative duplication and uncertainty among contracting authorities. To address this, the revised directives could provide clearer guidance on what constitutes acceptable proof of compliance and equivalence, which would help to reduce legal ambiguity while easing the verification burden for both buyers and suppliers.

An EU-level mechanism, such as a shared repository or regularly updated guidance, could list recognized labels, certifications, and standards that meet directive requirements, along with model clauses and procedures for assessing alternative evidence. Existing resources, such as the European Commission's Green Public Procurement website,[8] already provide a foundation by compiling GPP criteria, guidance, and product-group requirements.

Building on this foundation, an expanded and regularly updated repository could provide a single reference point for contracting authorities, improving legal certainty, promoting comparability, and reducing costs—particularly for SMEs. Experts have also proposed replacing the current "or equivalent" clause with a requirement for "equivalent technical dossiers" to ensure that standards are measured and verified using comparable methods and avoid inconsistencies in how environmental performance is assessed.

Strengthen Professionalization and Capacity for GPP Tool Uptake

While the EU procurement directives shape how sustainability can be integrated into public purchasing, they do not include legal provisions on the professionalization or training for contracting authorities. Yet, capacity building and professionalization are critical enablers for the stronger use of GPP tools—and better public procurement in general. Procurers cannot effectively apply instruments such as ecolabels, EPDs, carbon management systems, or life-cycle costing without the necessary technical knowledge to interpret environmental data, assess supplier evidence, and integrate verified criteria into tender processes.

The revised directives could encourage EU member states to embed sustainability competencies into the professional development frameworks for public procurement officials. Training curricula should include practical modules for selecting and applying GPP tools covering how to interpret ecolabel requirements, use EPD data, and integrate life-cycle or carbon metrics into award criteria. These competencies should be incorporated into national procurement academies and continuous learning systems to ensure that sustainability becomes a core part of procurement practice rather than a specialized add-

[8] Visit the website here: https://green-forum.ec.europa.eu/green-business/green-public-procurement/gpp-criteria-and-requirements_en

on. The ProcurCompEU competency framework offers a useful foundation for this effort.[9] Its *Sustainable Procurement* competence (Competence 5) already recognizes the need for procurement professionals to understand and apply relevant sustainability tools, standards, and techniques throughout the procurement process.

In parallel, initiatives such as the PPE+ Europe 2024–2028 program, which provides annual training to procurement professionals from centralized purchasing bodies across various EU countries, demonstrate the potential of cross-country collaboration to strengthen sustainability, innovation, and strategic competencies.[10] Expanding such support mechanisms would not only enhance consistency across the EU but also help make procurement below the EU thresholds more sustainable (Schotanus et al., 2024). This is key, as smaller contracts represent up to 80% of total public procurement value in the EU yet generally show lower uptake of sustainability criteria (Schotanus et al., 2024).

Encourage Market Engagement to Exchange Knowledge and Communicate Expectations

The revised procurement directives should more clearly encourage engagement between public buyers and potential suppliers. Procurers need certainty that transparent and fair market engagement is both safe and encouraged under EU rules.

Structured dialogue between the public and private sectors can play a decisive role in advancing GPP and related tools. On the one hand, market engagement allows procurers to better understand what the market can deliver. For instance, they can collect information on which certifications or ecolabels are available in a specific sector, the potential cost implications of sustainability requirements, or which tools suppliers already use to measure and report environmental performance. This knowledge enables public buyers to design more practical, realistic, and ambitious GPP requirements.

On the other hand, market engagement gives procurers an opportunity to clearly communicate their sustainability ambitions to suppliers. For example, it is a chance to share plans to source only organic food or low-carbon construction materials in future tenders. Early communication provides suppliers with the time and predictability they need to innovate, adjust their operations, or obtain relevant certifications.

In addition, such exchanges strengthen healthy competition and SMEs' access to green tenders. Market engagement can build supplier capacity and reduce access barriers, particularly for SMEs. Open dialogue also helps dispel misconceptions about sustainability costs and certification burdens.

[9] See more on the framework here: https://commission.europa.eu/funding-tenders/tools-public-buyers/professionalisation-public-buyers/procurcompeu-european-competency-framework-public-procurement-professionals_en

[10] See more on the PPE+ Europe program here: https://commission.europa.eu/funding-tenders/tools-public-buyers/professionalisation-public-buyers/procurcompeu-european-competency-framework-public-procurement-professionals_en

Conclusion

The reform of the EU public procurement directives represents a critical opportunity to unlock the full potential of GPP as a lever for the green transition. While robust tools already exist and have demonstrated tangible results across member states, their uptake remains limited by legal uncertainties, administrative fragmentation, capacity constraints, and cost perceptions.

Mainstreaming robust GPP tools can generate diverse strategic benefits in the EU. It would create demand for sustainable goods, works, and services, helping companies improve their practices and stimulating innovation in green industries. It would ensure value for money for taxpayers by making the environmental and economic performance of tenders more transparent and comparable. And it would make bidding easier for companies, particularly SMEs, if requirements and tools were harmonized or comparable across member states, lowering compliance costs and opening markets.

Realizing this potential at scale would require addressing the barriers that currently hold back wider adoption through interconnected actions:

- clarifying legal provisions by broadening the interpretation of the "link to subject matter" requirement and considering terminology that emphasizes value over narrow economic considerations;
- improving comparability and standardization through EU-level guidance, shared repositories of recognized tools, and clearer procedures for assessing equivalence;
- strengthening professionalization and capacity by embedding sustainability competencies into training frameworks for procurement officials; and
- enhancing market engagement.

By creating a stronger enabling environment for robust tools, the revised directives could transform public procurement from an administrative function with high environmental impact into a strategic driver of Europe's green, circular, and competitive future.

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