



IRISH LANDSCAPE INSTITUTE
Institiúid Tírdhreacha na hÉireann

**Submission on Green Public Procurement
July 2011**

Irish Landscape Institute



1.0. Introduction

The Irish Landscape Institute (ILI) is delighted at the opportunity to respond to the invitation for submissions in response to the Draft National Action Plan on Green Public Procurement currently advertised for Public Consultation.

In summary, and in recognition of general national and European policy and legal requirements, the plan's general aims include the following:

- Greater value for money and greater efficiencies
- Public Sector to play exemplary role in green public procurement
- Low Carbon economy
- Using environmental criteria in procurement procedures
- Buying Social

The ILI recognises the opportunity presented by such a co-ordinated and strategic approach to public procurement in terms of ensuring appropriate environmental criteria are met by various goods and services procured, in terms of reduced environmental impact – less pollutions, climate change and impacts on biodiversity, as well as the potential to enhance the quality of life, better decision making and better value for money - by such an ethos being applied across all purchasing and commissioning decisions.

Our main commentary below is in relation to the core activity of landscape architects working in the public and private sector in Ireland in the design, management and care of the Irish Landscape - new landscapes and existing landscapes – and its constituent elements - natural (geology and ecology), cultural (patterns and built elements) and uses.

Our submission below relates primarily to Chapter 6: Construction, of the Draft Action Plan, however we comment initially on important aspects of procurement not mentioned in the Plan – The procurement process itself and management of that process.

2.0. Procurement

2.1. Reduced Paper in the Procurement Process

The Action Plan recognises the need for reduced environmental impact of products and services to become a key criteria in procurement decision making, however the process of procurement itself is increasingly wasteful of paper and purchasers and suppliers time and money.

Tenders often demand multiple hard (paper) copies of submissions, particularly at pre-qualification stage illustrating the status or policies of a tendering company across a range of criteria. These criteria are marked on a pass fail basis occupying huge amounts of tenderers time in collating, purchasers' time in assessing and often boxes of paper to contain. Some public agencies in Ireland and some public bodies in Europe generally require that companies confirm



compliance with a simple checklist of these items and their ability to furnish the relevant proof should this be requested. In practice, only the winning tenderer needs to be able to demonstrate compliance with many of the criteria which are pass / fail in nature, with specific quality criteria informing the decision making process in terms of the selection of the winning tender.

There is a danger that the GPP process itself may generate a significant additional amount of paperwork to demonstrate compliance with standards requested – this would appear to be counter-productive to the intention of the process and its ethos. In addition increased paperwork in the tendering process would favour larger companies and service providers at the expense of smaller and perhaps local providers, stifling new enterprise and innovation. Where such submissions are required, evaluation systems could, as much as this is possible, be in electronic form. The shifting of the administration of tenders to electronic format for documents, reporting, evaluation and document control in general would be logical given the nature of the guidelines. The further development of the systems of procurement should also eliminate duplication where possible and thus should avoid multiple copies of the same data being held for projects involving the same supplier where applicable.

2.2. Travel – Carbon Footprint

In an increasingly globalised world and certainly at European level, service providers, if they can supply competitively, will be providing services and goods in many different countries. For many goods “shipped” in the traditional way – by volume at sea or rail etc, travelling costs may not significantly impact on the environment. However for services, including consultancies, travel may mean air travel of staff to carry out projects in other countries. Procurement should consider these environmental impacts as part of a GPP strategy. Long distance project servicing does have an environmental cost - if not a monetary cost. Consideration as to the long term value and sustainability of advice from afar should be weighed against the quality of the service which may be genuinely unique to that service provider. Nonetheless there is also a need to “Buy Social” and support the long term development and sustainability of local and often smaller providers.

Summary

- GPP should be an ethos of the public sector not just in the way that goods or services are procured but also in the manner in which those goods or services are procured and the way in which the public and private sectors engage with the procurement process.
- GPP can be used to support locally based service providers where appropriate and, subject to all other factors being equal, thus contribute to sustainable social and urban development.
- Monitoring of public procurement should analyse each sector, determine if an indigenous range of service providers exist and assess if they are renewed on an ongoing basis. This analysis should for instance investigate the proportion of younger firms versus older, more mature and often larger firms and whether or not the market is becoming or is already dominated by a small number of larger service providers. Anecdotally, the requirements of and the unnecessary degree of resources required to enter the tendering



process are so onerous as to exclude many small and medium enterprises and their varying levels of maturity. Procurement should be ensuring more sustainable approaches which open the market for greater competition.

3.0. Construction – Ref Chapter 6 of Draft Action Plan

Please note the following comments for review and / or inclusion within this chapter as appropriate:

- Building stock and physical infrastructure should include reference to the public realm, open spaces and amenities. This is particularly physically representative of Green Public “Projects” and includes many showcase landscape design projects by ILI members which demonstrate eco-innovation and sustainable practices in site management and development. The ILI is happy to provide examples of this for consideration in the drafting of future guidance.

Context

- In this section we suggest reference to The National Biodiversity Action Plan, The National Landscape Strategy (yet to be published) and The European Landscape Convention. It is important to recognise the implications of public procurement on what the European Landscape Convention describes as “everyday landscapes”, and the potential, through those everyday places for GPP to contribute positively to improving the quality of life and general environment. ILI members and landscape architectural involvement in most if not all construction projects can provide this added value.
- The Government Policy on Architecture is incomplete in that it does not provide a policy framework for the built environment with regard to a policy on landscape design in the built environment. However, the ILI is working as a stakeholder with the Department on some aspects of implementation. GPP for most construction projects can ensure that landscape (and its associated values in quality of life, visual amenity, and biodiversity/greening) is a significant consideration.
- With regard to the Government Policy on Architecture 2009-2015 *Towards a Sustainable Future: Delivering Quality within the built Environment*, the ILI is currently involved in this implementation process, associated education and research and the Urban Forum.
- In terms of guidance, specifications and criteria the ILI with the European Federation of Landscape Architects (EFLA) can bring relevant expertise – through its regular technical lecture series, conferences or otherwise assist through policy groups in developing frameworks.
- The ILI and its members is one of the lead professional organisations in the procurement and supply of green services and has promoted concepts of Green Infrastructure as a strategic approach to planning the built environment.

Key Aspects

- In the preparation of the requirements for tender, care should be taken in inclusion of the requirement that design consultants display special experience and qualifications in “environmental” design. In the first instance there is a danger of introducing further onerous paperwork to the procurement process and a cost on business and those



- assessing (as set out in Section 2.1 above). Secondly, as the largest procurer of consultancy services, any change to the profile of services required by the State/public bodies could inadvertently favour companies who have a multi-national structure or are based abroad and can draw on experience, for the purposes of completing a pre-qualification questionnaire, from regions where such services have been in demand for some time. Designers, by their nature and training, can adapt their skills to meet the clients' requirements and although they may have limited experience in supplying a particular (green) service, they have the capacity to address a clear service requirement / brief, just as they would respond to new regulations or standards. The professional networks available to our members such as the International Federation of Landscape Architects also ensure that members within the community of landscape architects are fully briefed on latest international practice. This is achieved through publications, workshops and seminars and as required or appropriate. Rather than excluding a range of competent consultants in a pre-qualification questionnaire, such issues can be addressed at a later stage when the brief can clearly set out the requirement for a particular "green" approach, service or outcome, and the consultants invited to set out in their approach/methodology how they would address it and their relevant skills / experience. The international dimension and the selection of relevant expertise if necessary can then be included as part of the tender agreement.
- Notwithstanding our concerns above, landscape architectural services regularly include ensuring that environmental protection and standards are adhered to from initial design concepts to the decision on location of public facilities through to construction and operation. ILI members are regularly involved in site or route selection, assessment and implementation, for motorways / roads and rail projects, buildings projects, ports/docklands, institutional buildings, flood control and Sustainable Urban Drainage Systems as well as Ecological projects and Site Utilities.
 - ILI Members possess a level of education and professional experience which includes a minimum of degree level; landscape architecture courses are accredited at international level by the European Federation of Landscape Architects (EFLA) and all ILI full corporate members undergo a professional practice exam. ILI members play a key role in balancing the impact of development on the overall landscape. As part of the preparation of GPP that may be required for development projects. ILI members, in particular, can assist with project conceptualisation, from site selection through to maintenance of landscape design, thus building in a strong environmental rationale at the early stages of a project procurement process rather than its later addition.

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Materials

- In order to ensure that individual projects, purchasers and designers / consultants do not bear the cost of research and assessment of the relevant environmental performance of a range of potential products / materials consideration should be given to a national or EU scoring system or grading for such products / materials based on agreed criteria, similar to that for electrical goods and / or timber products. At the very least, as part of GPP, guidance as to best practice in the selection of materials could be provided as a centralized resource / database



- Consideration as to the management, reuse, recycling and protection of soils and topsoils should be a key aspect of GPP – this item is almost never considered in development in terms of environmental impacts/disbenefits other than disposal and transportation. Topsoil is a finite resource and under most threat from urban and infrastructural development in areas of the highest agricultural value. Topsoil management should be a requirement in all land-use / development procurement.
- ILI members have expertise of in sourcing and specifying sustainable, local materials, green technologies and systems and designing appropriate solutions for low input, low maintenance landscapes. This can save money, be more sustainable environmentally in terms of the design, procurement and use of materials in all development projects.

Key Actions

- Suggest that, at the design stage (or even for planning permission purposes which would cover all construction – public and private), a life-cycle statement be produced covering a range of GPP issues related to maintenance, management and use, including scenarios for end of use of the building, development or construction.
- The ILI supports the development of a guidance document to support GPP in construction to include materials, standards and evaluation methodologies. The ILI is available to contribute to any working group or forum investigating these issues. This approach would be based on providing assistance and support for the construction sector – particularly the designers and contractors within the sector– in achieving the change envisaged. This would form part of the development of improved GPP.

4.0. Ref Chapter 13: Next Steps and Follow-Up

4.1. The ILI would be interested in participating in any contact group advising or consulting on the development and implementation of a GPP Action plan. The ILI has recently put in place a Procurement Working Group looking more generally at the public procurement process.

4.2. The ILI would be happy to host a CPD or similar information dissemination event or workshop for our members in the public and private sector on GPP. ILI CPD is mutually recognised by other Institutes within the Urban Forum.

4.3. The ILI and its Education Committee works closely with the European Foundation for Landscape Architects (EFLA) and assists the accreditation of the UCD Landscape Architecture course and would be open to supporting the inclusion of “sustainable procurement and GPP procurements” or any other aspect of sustainability education which feeds through to the GPP process.

4.4. Noting our concerns above, particularly with regard to the procurement of consultant design services, the ILI would be available to assist Government Departments and Agencies identify and / or research appropriate green criteria into public sector tendering processes relevant to our members.



5.0. Ref: Appendix List of Key Actions (Construction Sector)

5.1 In relation to life cycle costing, the distinction should be made between monetary costs and environmental costs. They are not necessarily the same. In relation to landscapes and habitat, life cycle costs can involve maintenance to ensure a particular habitat remains in place and a particular green outcome achieved. Such maintenance, although desirable, can be quite intensive and indeed more specialised than more traditional and cheaper forms of maintenance.

5.2. In addition, the ILI would be willing to assist in the development / research of a guidance document and resource database for GPP and can draw on a wide range of relevant experience from among its members.

5.3. The ILI would be interested in assisting any contact group in the progress of the GPP Action Plan and suggest that the contact group should be expanded to include representative bodies of service providers as well as the procurement departments or agencies.

We trust the above comments and observations are of use to you and confirm again our willingness to assist in the development of the GPP Action Plan.

On behalf of the Irish Landscape Institute

Yours sincerely

A handwritten signature in black ink, appearing to read 'Declan O Leary', written in a cursive style.

Declan O Leary

Vice President
Convenor Landscape Policy Working Group

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