

ESPP input to public consultation on Directive 2014/24/EU on Public Procurement 7th March 2025

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14427-Public-procurement-directives-evaluation_en

ESPP considers that the EU's three public procurement Directives should be updated to better facilitate and incite environmental objectives in public purchasing selection, in particular to support the circular economy.

ESPP notes the proposals in the Commission's "Vision for Agriculture and Food" [COM2025\(75\)](#) to strengthen the role of Public Procurement with a "best value" approach to reward quality and sustainability, including certified Organic products and short food supply chains, and in the Enrico Letta [report April 2024](#) "Much more than a market - Speed, Security, Solidarity – Empowering the Single Market to deliver a sustainable future and prosperity for all EU Citizens".

At present, the EU public procurement directives prioritise the lowest cost option (e.g. art. 67.1 of 2014/24/EU "most economically advantageous"), subject to respecting environmental obligations (art. 18.2) and only optionally the possibility to take into account the "price-quality ratio ... on the basis of criteria including environmental aspects" (art. 67.2), and then subject to the condition that environmental externalities can be taken account only if "monetary value can be determined and verified" (art. 68.1.6). This condition is often difficult to achieve and to document.

ESPP suggests that consideration of environmental aspects be no longer an option subject to difficult conditions, but be required wherever feasible.

- Respect of environmental obligations should remain obligatory
- Wherever feasible, environmental aspects should be considered alongside price-quality ratio
- If available and if relevant, should be taken into account:
 - Life Cycle Analyses,
 - Product Environment Footprints,
 - monetarisation of externalities,
 - environmental and sustainability labels and certifications,
 - supplier Corporate Sustainability Reporting,
 - EU Taxonomy criteria.
- Aspects considered should include
 - greenhouse emissions,
 - circularity, including design for durability, reuse and recyclability, use of secondary raw materials – recycled content,
 - Critical Raw Materials,
 - bioeconomy,
 - Organic Farming,
 - short supply chains, local, regional and EU production.

This wording should be coherent with objectives of the announced EU Circular Economy Act and with the existing EU Circular Economy Action Plan, and with relevant EU regulations, in particular: Taxonomy, Corporate Sustainability Reporting Directive, EcoDesign, Eco Label, BioEconomy Strategy.