



HSE Green Procurement Strategic Framework

HSE Climate and Sustainability Programme

An Overview of the United Nations Sustainable Development Goals



Executive Summary

Climate change presents a fundamental threat to human health. It affects the physical environment as well as all aspects of both natural and human systems, including social and economic conditions and the functioning of health systems. As climatic conditions change, more frequent and intensifying weather and climate events are observed, including storms, extreme heat, floods, droughts and wildfires. These weather and climate hazards affect health both directly and indirectly, increasing the risk of deaths, non-communicable diseases, the emergence and spread of infectious diseases, and health emergencies.

The Health Service Executive (HSE) is committed to reforming and improving the delivery of care to help reduce greenhouse gas (GHG) emissions and is aligned with the Sláintecare Reform Programme, which prioritises digital healthcare, promotes social prescribing and facilitates service users care closer to home. The impact of COVID-19 has led to a large increase in the use of digital services, not just for provision of healthcare services, but also enabling people to work from home as far as is reasonably possible.

This framework aims to set clear minimum requirements to address the main environmental and social impacts of HSE contracts with suppliers and service providers. It identifies staff training and resource requirements, setting targets, monitoring, and reporting on progress. It strengthens the HSE's dedication to enabling sustainable and greener public procurement in the HSE Corporate Procurement Plan 2025-2027, by embedding environmental criteria and promoting responsible purchasing practices across all procurement activities. It builds upon success which procurement teams have already achieved in integrating sustainability across many HSE contracts.

It is intended that this document will be a live document which will be updated and expanded as required to reflect emerging best practices and mandated requirements outlined in the Climate Action Public Sector Mandate which is updated annually.

Table of Contents

Executive Summary	3
1. Purpose	5
2. Scope	6
3. Core Requirements	7
3.1 Compliance with Legislation	7
3.2 Sustainability Criteria in Tenders	7
3.3 User and Market Consultation	7
3.4 Life-cycle Costing	8
3.5 Contract Performance Conditions and Contract Management	8
4. Criteria and Targets	9
5. Tools and Training	9
6. Monitoring and Reporting	9
7. Resources and Responsibilities	9
8. Adoption and Review	10
9. Health Care without Harm	11
Table 1: GHG Emissions of the HSE by Scope	12
Figure 1: Scope Emissions	12
Figure 2: Breakdown of Purchased Goods and Services	13
Figure 3: Comparison of projected BAU emissions and the target reduction trajectory	13
Figure 4: Projected emissions trajectory from 2019 to 2050, showing the impact of each individual intervention layered over time	14
Table 2: Thresholds, timelines and associated assumptions relating to the decarbonisation interventions	15
10. Focus on Criteria and Targets	16
10.1 Recommendations for Action	18
11. HSE Procurement Roadmap	24
12. Support for Implementation and Next Steps	25
12.1 Implementation Enabler 1 - Governance	25
12.2 Implementation Enabler 2 - Measurements and Assurance	25
12.3 Implementation Enabler 3 - Communication and Training	25
Appendix 1 Applicable Legislation	27
Appendix 2 Reporting Arrangements	30
Appendix 3 Resources and Responsibilities	31
Appendix 4 Overview of Strategic Sourcing and Contracting Portfolios	33

1. Purpose

Sustainable Procurement is identified as a priority area under the [HSE Climate Action Strategy](#). Procurement plays an essential role in influencing the HSE's scope 1, 2, and 3 emissions and is key to delivering the other frameworks adopted under the Climate Action Strategy, including greener models of healthcare, mobility and transport, green space, and water conservation. Collecting relevant data from supply chain partners and building adaptation capacity into contracts are also vital to ensure operational resilience in a changing climate.

The purpose of this framework is to set clear minimum requirements to address the main environmental and social impacts of HSE contracts with suppliers and service providers. It also provides a framework for identifying staff training and resource requirements, setting targets, monitoring, and reporting on progress. It strengthens the HSE's dedication to enabling sustainable and greener public procurement in the HSE Corporate Procurement Plan 2025-2027, by embedding environmental criteria and promoting responsible purchasing practices across all procurement activities. It covers activities carried out by Strategic Sourcing (SS&C) and Contracting, Logistics and Inventory Management (L&IM) and Procurement Business Support (PBS). It builds upon the success which these teams have already achieved in integrating sustainability across many HSE contracts.

The inclusion of environmental criteria in all public sector tenders valued above the national threshold is mandated under Ireland's national [Green Public Procurement strategy](#), and by [Circular 17/2025](#) issued by the Office of Government Procurement. The mandate is accompanied by planning and reporting requirements and annual staff training commitments. This framework reflects the national mandate, as well as Irish and EU legislation, which creates binding sustainability requirements in respect of public sector procurement.¹ It also reflects Ireland's commitment to the United Nations Sustainable Development Goals (SDGs), including [Target 12.7 on Sustainable Public Procurement implementation](#).

The health sector is estimated to account for 4-5% of global greenhouse gas (GHG) emissions,² and is also a significant contributor to water, air and soil pollution and biodiversity loss. These impacts are embedded in supply chains across the many categories of medical and non-medical products and services needed to operate healthcare systems. Working with [Health Care without Harm](#) and Arup, a GHG Emissions Baseline Report for the HSE was prepared in 2025 capturing direct and indirect scope 1, 2, and 3 GHG emissions across the organisation. This has identified high-priority categories for decarbonisation including pharmaceutical, medical equipment, food/catering services and ICT. Contract-specific data is still missing in many cases, and there is a need for a more consistent approach to mitigation, reporting and adaptation across contracts.

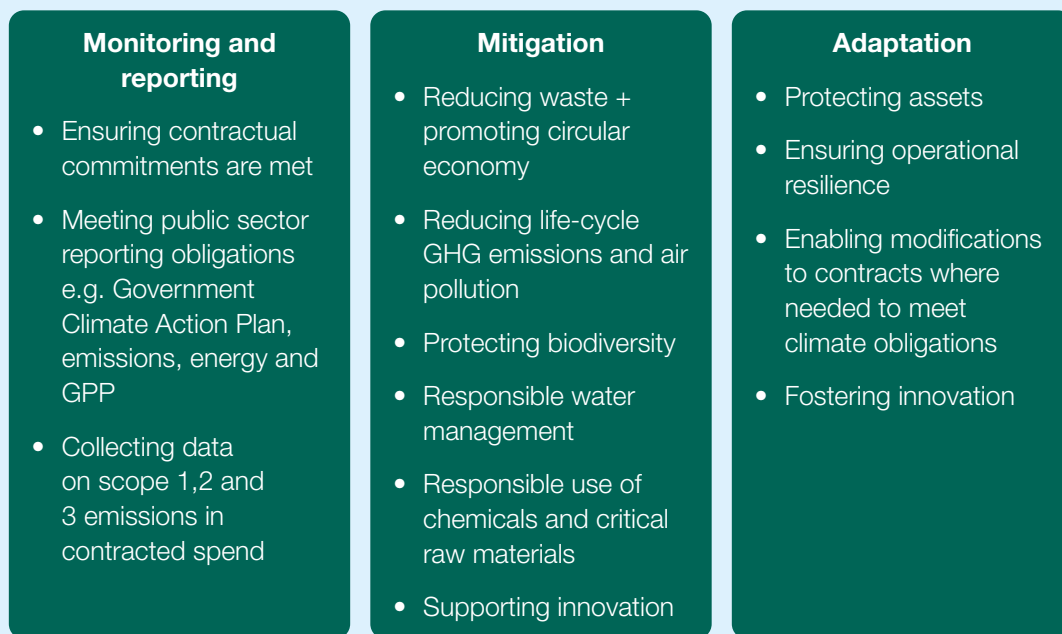
The Environmental Protection Agency (EPA) has developed [Green Public Procurement Guidance and Criteria](#) covering 11 product and service categories. These are based on research and standards adopted by the European Commission and informed by consultation with Irish public bodies, businesses and third sector organisations. The Office for Government Procurement (OGP) has developed the '[GPP Criteria Search](#)' tool to facilitate access to the criteria and has introduced GPP across the majority of its frameworks. However, standardised GPP criteria do not exist for many products and services purchased by the HSE, and this framework aims to address those gaps.

¹ A key principle of implementing sustainable procurement under EU law is the need to focus on the specific goods, services and works being purchased, rather than general corporate commitments such as 'Net Zero'.

² Healthcare Without Harm/ARUP (2019) [Healthcare's Climate Footprint](#)

2. Scope

The framework targets three interrelated areas, which align with the focus of the Climate Action Strategy.



This approach will deliver on the Strategic Objectives (SOs) identified in the Climate Action Strategy:

- **SO5** Develop procured goods and services waste reduction framework and supporting implementation plan to reduce waste and related emissions, strengthen supply chain resilience and support the transition towards a circular economy.
- **SO6** Develop a baseline for all HSE supply chain emissions and work in consultation with key supply chain product partners to include sustainability criteria in all tender procurement processes and establish a credible decarbonisation trajectory (no later than 2025).

In order to effectively address the environmental and social impacts of HSE procurement, all contracts and frameworks valued above the national threshold (currently €50,000 for supplies/services) are subject to the core requirements set out in Section 3. While these core requirements apply across all contracts, they allow flexibility regarding the approach and criteria to be applied in individual tenders. An interim evaluation to be carried out 12 months after adoption will review the effectiveness and efficiency of this approach.

This framework does not address expenditure by HSE Capital and Estates in relation to works contracts, which are covered by a separate decarbonisation framework. The framework incorporates Logistics and Inventory Management as a critical component to support the HSE's green procurement objectives, by optimising the purchase, storage, and distribution of products. The National Distribution Centre (NDC) role in green procurement is significant because it offers an opportunity to implement sustainable practices at scale. By consolidating supplies and optimising distribution networks, the NDC has reduced transportation emissions and improved energy efficiency in warehousing operations. Enhancing Logistics and Inventory Management sustainability practices ensures that the environmental benefits of green procurement extend beyond the point of purchase into the entire supply and delivery system.

3. Core Requirements

For all contracts and frameworks within scope, the following core requirements apply.

3.1 Compliance with Legislation

The HSE will comply with all applicable Irish and EU legislation which sets specific sustainability obligations in the context of procurement. A list of relevant legislation at the time of publication is set out in Appendix 1 – this list will be updated as new legislation becomes applicable.

Note that some of this legislation places direct obligations on the HSE as a contracting authority, while some of it places obligations on suppliers/service providers. The criteria and reporting arrangements to ensure compliance with applicable legislation are set out in Section 10 and Appendix 2.

3.2 Sustainability Criteria in Tenders

All tenders will include technical specifications and/or award criteria which target the main environmental and social impacts of the specific goods or services being purchased, where possible.³ Green technical specifications (i.e., minimum environmental requirements for the goods and services being purchased) will be used wherever these are available from one of the sources set out in Section 10, and are appropriate for the specific requirement.

Environmental and social award criteria may be used either in combination with green technical specifications, in which case a minimum weighting of 10% applies, or on their own, in which case a minimum weighting of 15% applies. The process for identifying and selecting appropriate criteria is set out in Section 10. Where no sustainability criteria are applied, a specific justification for this must be provided in the Tender Approval Request (TAR) form.

In appropriate cases, selection criteria relating to bidders' previous experience, or human and technical capacity to implement environmental or social measures in contracts, may also be applied. In all cases, GPP criteria will be accompanied by a verification clause stating the evidence which must be provided by bidders in relation to green claims, and by appropriate contract performance conditions as set out under 3.5.

3.3 User and Market Consultation

Where the application of sustainability criteria is likely to have a significant impact on user experience or contract management, users/contract managers will be informed of the intention to apply sustainability criteria and consulted regarding their implementation.

Supplier engagement, including through a targeted Supplier Sustainability Questionnaire, will inform the development of criteria for each Portfolio. If any doubt exists about the ability of the market to meet the identified sustainability criteria, or there are concerns about impacts on cost, competition or other aspects of performance/delivery, potential suppliers or service providers will be consulted in advance of the tender, for example by publishing a Request for Information which explicitly refers to the planned sustainability criteria. We actively engage with Multilateral Groups on green procurement, which brings together health providers from across multiple countries to harmonise sustainability requirements for suppliers.

Outside of individual tenders, the HSE will continue to support ongoing internal and external engagement on sustainable procurement, including through forums such as HealthTech Ireland and Meet the Buyer events.

³ The work to identify the main environmental impacts of each product/service purchased by the HSE will be undertaken as part of SS&C criteria development workshops in 2025-26.

3.4 Life-cycle Costing

The use of life-cycle costing (LCC) will be considered for all contracts and frameworks in which more than 10% of the total cost of ownership is expected to arise after the point of purchase.⁴ The purpose of life-cycle costing is both to identify the true costs associated with a procurement and to promote the adoption of solutions which save resources over the long term.

LCC supports sustainable procurement by identifying the business case for solutions which are more durable and efficient, for example, because they consume less energy, water, or fuel. It also takes into account end-of-life costs or revenue (for example, where assets can be resold or reused).

If a decision is taken not to apply life-cycle costing for a relevant procurement, this must be justified in the TAR.

3.5 Contract Performance Conditions and Contract Management

All contracts and frameworks will include specific clauses/key performance indicators (KPIs) highlighting the commitments made by the successful tenderer in response to the sustainability criteria, together with clear requirements for monitoring, reporting, escalation and remedies in case of non-performance. Sustainability commitments will be a standing item on the agenda at all contract review meetings.

Contract clauses will also provide for periodic reviews of environmental performance, with the possibility of increasing the level of ambition in line with HSE's commitments in relation to climate change, adaptation or other environmental policies.

Requirements for contract-specific reporting by suppliers on emissions and energy consumption will be phased in across the HSE portfolios, beginning with higher-value and higher-impact contracts.

⁴ This includes ongoing costs in terms of energy, fuel, water, maintenance, upgrades or consumables. For example, ICT hardware, software/services and systems; laboratory and medical equipment; building systems; vehicles or other assets which have replaceable components or require routine maintenance/upgrades. Life-cycle costing should also be applied where significant end-of-life disposal costs or revenue will arise.

4. Criteria and Targets

Each Strategic Sourcing and Contracting Portfolio will work with the subject-matter experts to identify relevant GPP criteria for application in its tenders and integrate these into document templates. These will draw upon the sources listed in Section 10 and will be agreed, together with evaluation guidance, in consultation with affected teams. The application of GPP criteria will be subject to annual review by each Portfolio, to identify:

1. The effectiveness of the criteria in delivering environmental/social benefits
2. Any impacts on competition and costs
3. Need for updates based on technological or process changes
4. Resource or training requirements linked to the criteria

The HSE will adopt the national targets set out in Ireland's GPP Strategy, which are listed in Section 10.

5. Tools and Training

Relevant tools, criteria, guidance, and other resources for the application of GPP are specified in Section 10.

An annual training needs assessment will be carried out in respect of Strategic Sourcing and Contracting, Logistics and Inventory Management, and Business Support, as well as Evaluation Groups, to identify specific needs and put in place appropriate training plans.

6. Monitoring and Reporting

Appendix 2 sets out the process for monitoring and reporting on GPP, in accordance with Circular 17/2025.

The HSE is required to report on GPP both to the Sustainable Energy Authority of Ireland (SEAI) and by completing the relevant eForms fields on eTenders. In addition, progress in implementing the framework will be reported biannually via the Climate Action Steering Group. The Climate Action and Sustainability Programme will provide update to the six regional green committees.

7. Resources and Responsibilities

Appendix 3 specifies the lines of responsibility for each of the actions set out in the framework, and the expected resource requirements in terms of staff time.

8. Adoption and Review

The framework will be approved by the National Director of Procurement and subsequently endorsed by the National Climate Action Steering Group.

It will be disseminated by circulation to all staff in the affected teams.

A summary will be published on the HSE website and referenced in tender documentation and other communications with suppliers.

An initial review, to address any ‘teething’ issues, will be held six months after adoption.

Appendix 1 will be updated whenever relevant new legislation is adopted, and this will be circulated to all affected teams.

A first interim review will be conducted 12 months after adoption, to include the first assessment of progress against the targets.

The first interim review will also assess the extent to which the framework aligns with the ISO 20400 standard on sustainable procurement, as required under Ireland’s national GPP strategy.

Annual reviews and reporting against targets will be carried out thereafter. It is envisioned that the framework will be fully revised no later than 2030 to reflect progress under the Climate Action Strategy and associated priorities.

9. Health Care without Harm

HSE partnered with Health Care without Harm (HCWH) in 2023 to complete a project 'Operation Zero'. HCWH is a global initiative that works to transform the healthcare sector so that it is environmentally sustainable, climate-smart, and a driver of health equity.

HCWH was founded in 1996 after concerns that hospitals and health systems—ironically meant to promote health—were contributing to pollution and disease through waste incineration, toxic chemicals, greenhouse gas emissions, and unsustainable resource use.

Key Goals of the Healthcare without Harm project

1. Reduce environmental impact of healthcare
 - » Minimize greenhouse gas emissions from hospitals and health systems.
 - » Promote renewable energy, energy efficiency, and sustainable transport.
2. Eliminate harmful materials and practices
 - » Phase out toxic chemicals (for example mercury in medical equipment, PVC plastics).
 - » Reduce medical waste and promote safer waste disposal.
3. Promote sustainable practices in health systems
 - » Encourage green building standards in hospitals.
 - » Advance sustainable food procurement in healthcare facilities.
 - » Support climate-resilient healthcare systems, especially in vulnerable regions.
4. Advocate for health sector leadership in climate action
 - » Encourage hospitals and health organisations to be role models for sustainability.
 - » Influence public policy so that healthcare supports global climate and health goals.

The project with the HSE aimed to get a 2019 emissions baseline and produce a decarbonisation Roadmap Report. This includes a summary of current emissions, future trajectory, and scale of emissions reduction required to align with national targets and a net zero future. Currently within the HSE we have a good understanding of our scope 1 and 2 emissions. This project had a strong focus on scope 3. It explored action areas to address scope 3 emissions that are not covered through existing strategies. Identifying potential measures, adoption rates and thresholds, and modelling expected impact in emissions reduction through to 2050.

The table below details the breakdown of GHG emissions generated by the HSE in 2019. Total GHG emissions from the HSE across Scope 1, 2 and 3 amounted to 881.9ktCO₂e. This inventory excludes GHG emissions generated by organisations that receive funding from the HSE but are not directly managed by the HSE, such as Section 38 and 39 bodies. Definitions from these GHG emissions categories are laid out in the figure below.

Table 1: GHG Emissions of the HSE by Scope

	Emissions ktCO ₂ e	Share of total emissions, %
Scope 1 and 2 emissions	259.7	29.5%
Energy-related Scope 1 and 2 emissions (SEAI boundary)	206.6	23.4%
Energy-related Scope 1 and 2 CH ₄ and N ₂ O emissions	0.8	0.1%
F-gas emissions (i.e., anaesthetic gases & MDIs)	52.3	5.9%
Scope 3 emissions	622.1	70.5%
Category 1a: Purchased goods & services (excl water consumption)	352.2	39.9%
Category 1b: Water consumption	1.7	0.2%
Category 2: Capital goods	50.0	5.7%
Category 3: Fuel- & energy-related activities	33.6	3.8%
Category 4: Upstream transportation & distribution	0.2	0.02%
Category 5a: Solid waste treatment	122.5	13.9%
Category 5b: Wastewater and effluent treatment	0.6	0.1%
Category 6: Business travel	6.7	0.8%
Category 7: Employee commuting	54.6	6.2%
Total emissions	881.9	100.0%

Figure 1: Scope Emissions

In 2019, Scope 3 emissions accounted for approximately 70% of the HSE's total annual GHG emissions, as defined within the boundary parameters shown in table below.

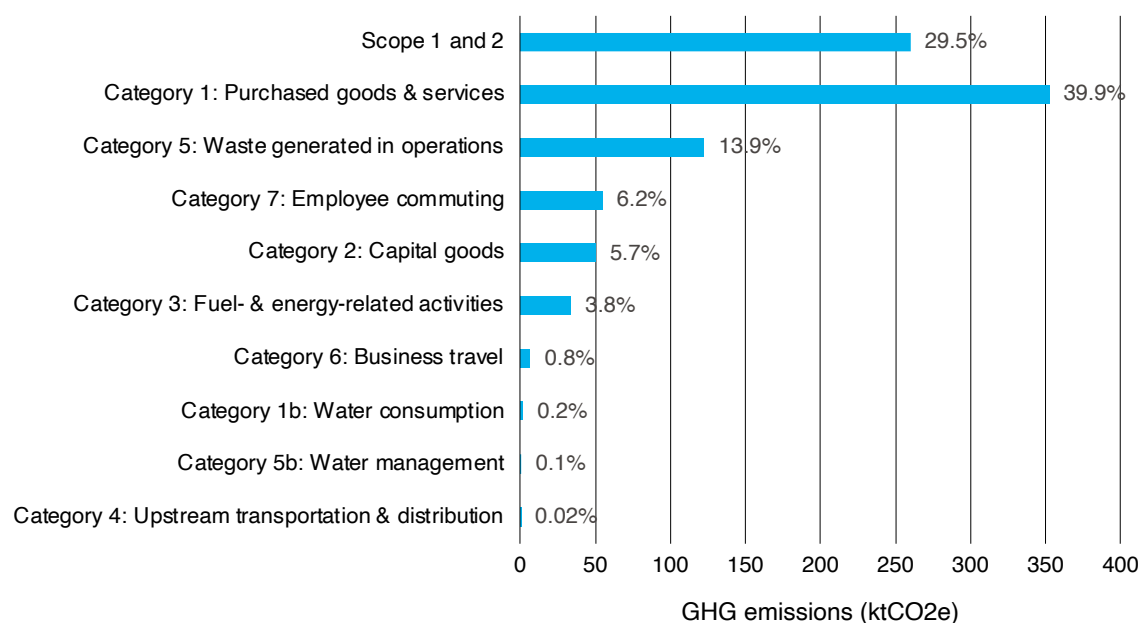
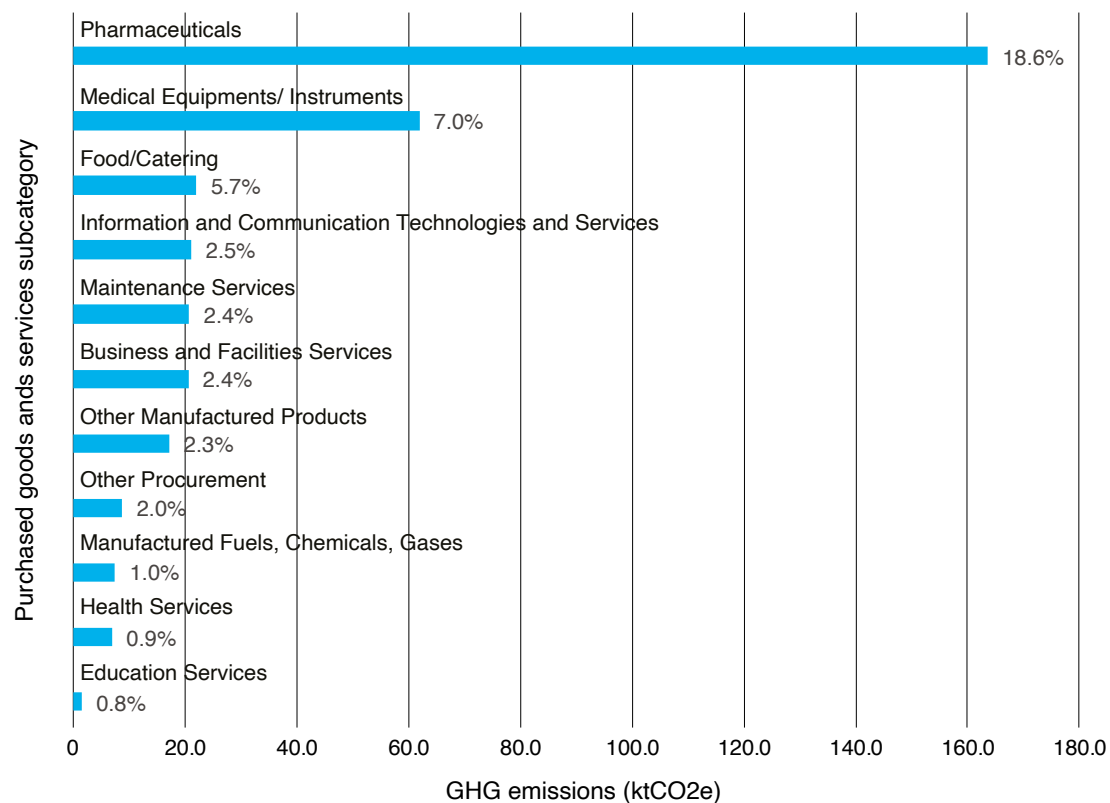
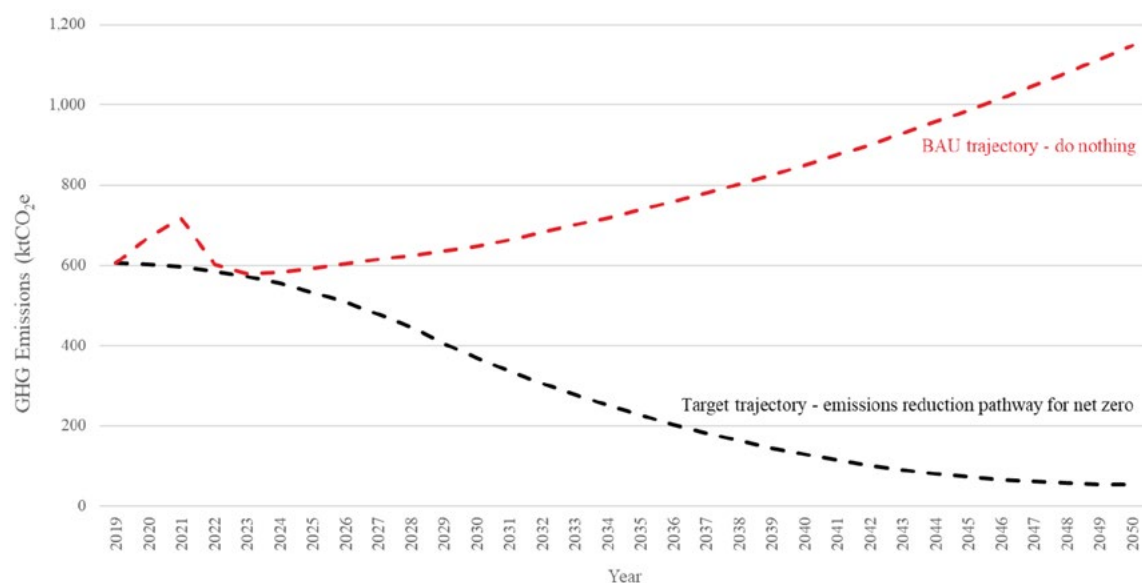


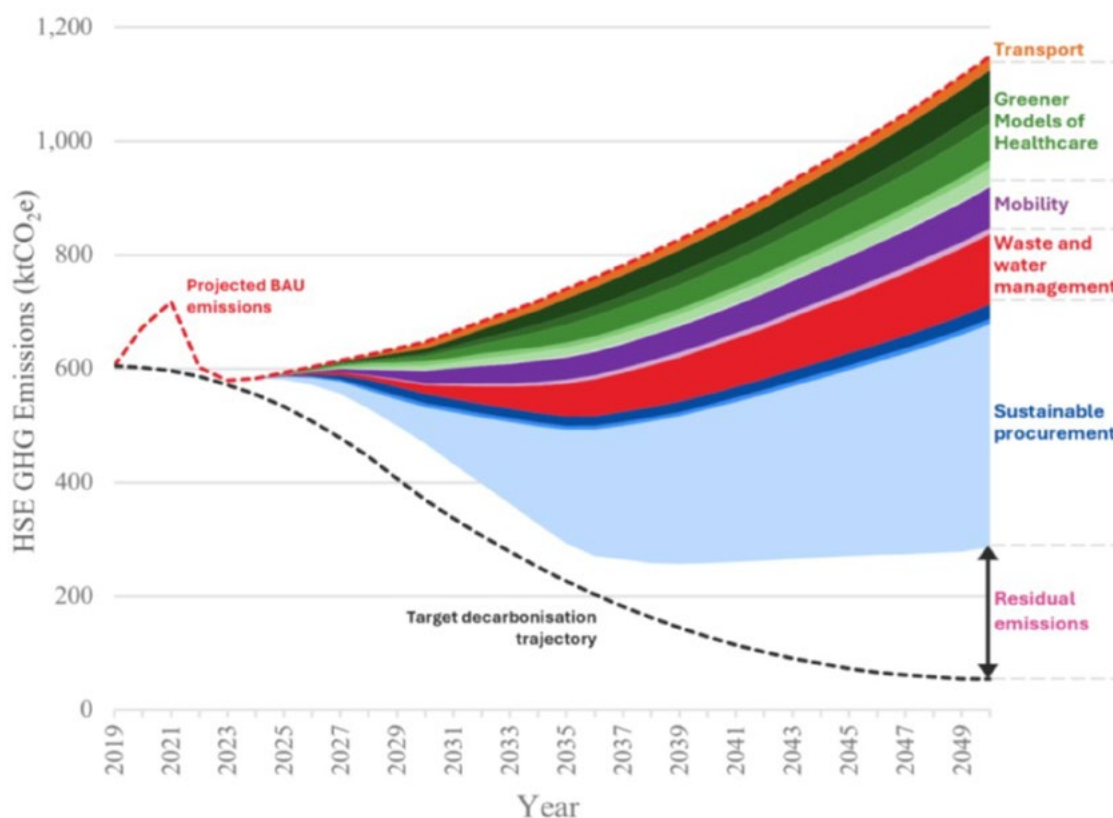
Figure 2: Breakdown of Purchased Goods and Services

The Business as Usual (BAU) emissions scenario illustrates the potential growth in the HSE's emissions in the absence of additional mitigation measures. As detailed in Section 2.2.1 of the Health Care without Harm decarbonisation report, the scenario projects an 89.9% increase in emissions by 2050, reflecting both expected growth in healthcare activity and border economic decarbonisation trends. For comparison, the indicative target trajectory, shown by the dotted black line in the below figure, represents the scale of emissions reduction required to align with Ireland's national climate targets and international best practice.

Figure 3: Comparison of Projected BAU Emissions and the Target Reduction Trajectory

The difference between the BAU and the reference target trajectories illustrates the scale and pace of decarbonisation required for HSE to achieve its net-zero ambitions.

Figure 4: Projected Emissions Trajectory from 2019 to 2050 (showing the impact of each individual intervention layered over time)



Intervention Name	Roadmap Colour
Electrification of inter-site vehicles	Orange
Optimised use of pharmaceuticals	Dark Green
Extending the lifespan of medical & IT equipment	Dark Green
Shift to less GHG emissions intensive inhalers	Dark Green
Shift to less GHG emissions intensive anaesthetic gas equivalents	Light Green
Reduce the carbon intensity of food in catering	Light Green
Reduce plate waste and optimise food purchasing	Light Green
Encourage lower-carbon employee commuting	Purple
Reduce the distance covered in business travel cumulatively and the emissions intensity of the transportation modes	Purple
Reduce the volume of waste generated and the emissions intensity of the treatment methods	Red
Prioritising low carbon pharmaceutical suppliers	Dark Blue
Prioritising low carbon medical equipment suppliers	Blue
Supplier decarbonisation standards	Light Blue

The project highlights a number of specific targets for the area of procurement:

Sustainable procurement	Prioritising low carbon pharmaceuticals suppliers	Prioritising low carbon suppliers involves requesting Environmental Product Declarations (EPDs) or sustainability data during the procurement process for pharmaceuticals, aiming to aid selection of lower carbon alternatives. Complemented by engaging suppliers on broader environmental performance, including efforts to reduce single-use items, prioritise reusable or refillable formats where clinically appropriate, and adopt more sustainable packaging materials.
	Prioritising low carbon medical equipment suppliers	Engaging with key suppliers of medical equipment to ensure that carbon associated with products is a key consideration in procurement. Through requesting Environmental Product Declarations and other information when selecting products and suppliers, procurement teams can select suppliers with lower emission products.
	Supplier decarbonisation standards	Mandate that suppliers have validated Science Based Target aligned decarbonisation strategies consistent with achieving net-zero by 2050. If suppliers adopt and deliver against these targets, decarbonisation progress can be driven across the full health care value chain.

Table 2: Thresholds, timelines and associated assumptions relating to the decarbonisation interventions

Intervention category	Intervention threshold	Intervention timeline
Optimised use of pharmaceuticals	Reducing quantity of pharmaceuticals purchased by 20%.	Fully applied by 2050
Extending the lifespan of medical and other IT equipment	All medical and IT equipment kept for a 25% extended lifespan.	Fully applied by 2050
Shift to low carbon inhalers	Transition to lower carbon inhalers reducing emissions intensity of inhalers by 90%.	Fully applied by 2040
Reduce the carbon intensity of food in catering	38% decrease in emissions from food by 2030, with a 76% reduction by 2050.	Half applied by 2030, fully applied by 2050
Prioritising low carbon pharmaceuticals suppliers	Transition to greener procurement of pharmaceuticals, reducing the emissions intensity of pharmaceuticals by 10%.	Fully applied by 2030
Prioritising low carbon medical equipment suppliers	Prioritisation of lower carbon suppliers reducing the emissions intensity of medical equipment by 10%.	Fully applied by 2030
Supplier decarbonisation standards	Transition to sustainable suppliers could reduce emissions for purchased goods and services by 76.5%.	Fully applied by 2050

There is learning from this project. The HSE is a very large organisation and can be difficult to navigate in terms of access to all the relevant data required. It highlights the need for investment in in-house capacity and knowledge.

10. Focus on Criteria and Targets

Criteria and targets will be developed to include a comprehensive library of criteria across the five SS&C Portfolios, based on the work undertaken in staff workshops and through supplier engagement. Relevant sources of criteria will include:

1. 2024 EPA Irish GPP criteria and Guidance (covering 11 categories, plus suggested approaches for professional services and electricity). These are the criteria incorporated in the OGP tool
2. *Buying Greener: Ireland's GPP Strategy and Action Plan 2024-2027* (including targets for 9 categories and sample criteria for categories not covered by the Irish GPP criteria)
3. EU GPP criteria, covering 20 categories (but many are out of date)
4. Healthcare sector criteria/standards developed under international initiatives including ATACH, Healthcare Without Harm, PAS 2090:2025
5. National and organisational GPP criteria e.g. NHS, Scottish Government, Netherlands and France

For reference, the national targets adopted under Buying Greener are:

Category	Targets
Food Procurement and Food Waste	T2 From 4 April 2024 a minimum of 10% by value (€) of food sought by public sector bodies under new contract arrangements (including via contractors such as canteen service providers), is to be certified organic in each of the following categories of Cereals, fresh Beef, Lamb, Pork, Poultry, Fish, Vegetables and Dairy products, where possible.
	T3 From 2025, 100% of new contract arrangements related to canteen or food services to include measures that are targeted at addressing food waste, with a specific focus on food waste prevention, taking into account Ireland's commitment to reduce food waste by 50% by 2030, and food waste segregation.
	T4 From 2024, 100% of new contract arrangements related to canteen or food services (including food services for public sector organised conferences) to cease using disposable/single use cups, plates and cutlery from any public sector canteen, closed facility, and public sector organised conferences, excluding clinical (i.e., non-canteen healthcare) environments.
ICT equipment	T5 By 2025, a minimum of 80% of ICT end user products (desktop computers, portable computers and mobile phones) procured by public sector bodies under new contract arrangements are certified to EPEAT Gold Standard (or equivalent), TCO Certified (or equivalent) or will have been remanufactured.
Textiles	T6 By 2027, polyester fibre products procured by public sector bodies under new contract arrangements must be manufactured using a minimum recycled content of 20%, where possible and proportionate.
Paper products and Printing	T7 From May 2024, where office paper for printing and photocopying must be procured, 100% of the paper must be recycled paper.

Category	Targets
Energy related products, Heating Equipment, Indoor and Outdoor Lighting	<p>T8 From January 2025, 100% of all tenders for the public procurement of energy related products, heating equipment, or indoor and outdoor lighting to include a requirement for tenderers to specify recommendations and options for the product, when the product or components of the product comes to the end of life, that consider environmental sustainability, including options for reuse, repair, and recycling.</p> <p>T9 100% of all tenders for the public procurement of heating systems to not install heating systems that use fossil fuels, in (1) new buildings, and (2) “major renovation” retrofit projects (as defined in the Energy Performance of Buildings Directive (EPBD)) subject to exceptions as specified in the Public Sector Climate Action Plan Mandate 2023.</p>
Indoor Cleaning Services	T10 From January 2025, 100% of all tenders for the public procurement of indoor cleaning services to include a requirement for tenderers to specify the training that will be put in place to ensure that all staff involved in delivery of the contract have the knowledge and skills to apply cleaning methods, which will reduce the environmental impact of the services.
Road Transport Vehicles	T11 100% of all tenders for the public procurement of vehicles to procure zero emissions vehicles only, subject to exceptions as specified in the Public Sector Climate Action Plan Mandate 2023.
Reuse and Repair	T12 By end of 2027, where possible and available, a minimum proportion of annual procurement by public sector bodies shall include used or repaired goods or materials. ⁵

⁵ Availability of used or repaired goods will be informed by the national network to support and scale reuse and repair in Ireland that has been established by the EPA.

10.1 Recommendations for Action

To achieve the objectives set out in the HSE Climate Action Strategy and to fulfil the Government's mandated requirements in the Climate Action Plan, Procurement, working collaboratively with other priority areas of the Climate Action Strategy, recommends implementation of the following:

Initiative Theme	Description	Timeframe
Applicable Legislation	<p>Apply all applicable Environmental and Social Legislation to the relevant HSE Tender processes</p> <p>Environmental requirements</p> <ul style="list-style-type: none"> • Climate Action and Low Carbon Development Act 2015 (as amended), Section 15 • S.I. 284/2016 European Union (Award of Public Authority Contracts), Regulation 18(4) • S.I. 284/2016 European Union (Award of Public Authority Contracts), Regulation 69(5) • S.I. 339/2011 Clean and Energy-efficient Road Transport Vehicles Regulations as amended by S.I. 381/2021 • S.I. 151/2011 Energy Efficient Public Procurement Regulations • S.I. No. 426/2014 European Union (Energy Efficiency) Regulations • S.I. No. 393/2021 - European Union (Energy Performance of Buildings) Regulations 2021⁶ • Regulation (EU) 2023/1542 concerning batteries and waste batteries • Net Zero Industry Act Regulation (EU) 2024/1735 <p>Social requirements</p> <ul style="list-style-type: none"> • S.I. 284/2016 European Union (Award of Public Authority Contracts), Regulation 18(4) • S.I. 284/2016 European Union (Award of Public Authority Contracts) Regulation 42(4) • S.I. 284/2016 European Union (Award of Public Authority Contracts), Regulation 69(5) • Human Rights and Equality Commission Act 2014, Section 42 • S.I. No. 358/2020 - European Union (Accessibility of Websites and Mobile Applications of Public Sector Bodies) Regulations 2020 • S.I. No. 131/2003 - European Communities (Protection of Employees on Transfer of Undertakings) Regulations 2003 • Work-life Balance and Miscellaneous Provisions Act 2023 	2026

⁶ A revised Energy Performance of Buildings Directive was adopted in 2024 (Directive (2024/1275), which introduces higher standards, such as all new public buildings being zero emission and requirements to install solar panels. These requirements will be phased in between 2026 and 2029.

Initiative Theme	Description	Timeframe
(EPA) GPP Criteria	<p>Apply 2024 EPA Irish GPP criteria and Guidance (covering 11 categories, plus suggested approaches for professional services and electricity). These are the criteria incorporated in the OGP tool</p> <ol style="list-style-type: none"> 1. Road transport vehicles and services 2. Indoor and outdoor lighting 3. ICT products and services (including data centres) 4. Heating equipment (including cogeneration, trigeneration and heat pumps) 5. Food and catering services 6. Energy-related products (white goods/appliances, electronic displays, vacuum cleaners) 7. Cleaning products and services 8. Paper products and printing services 9. Design, construction and management of buildings 10. Textile products and services (including uniforms and laundry services) 11. Furniture and related services 	2027
Non (EPA) GPP Criteria	For categories not addressed by the Irish GPP criteria, a default award criterion will be established which requests suppliers to outline specific actions they will take to address the key environmental/social impacts for that category.	2027

Initiative Theme	Description	Timeframe								
Criteria and Targets	1. 2024 EPA Irish GPP criteria and Guidance (covering 11 categories, plus suggested approaches for professional services and electricity). These are the criteria incorporated in the OGP tool	2027								
	2. Buying Greener: Ireland’s GPP Strategy and Action Plan 2024-2027 (including targets for 9 categories and sample criteria for categories not covered by the Irish GPP criteria)									
	3. EU GPP criteria, covering 20 categories (but many are out of date)									
	4. Healthcare sector criteria/standards developed under international initiatives including ATACH, Healthcare Without Harm, PAS 2090:2025									
	For reference, the national targets adopted under Buying Greener are:									
	<table><tr><th>Category</th><th>Targets</th></tr><tr><td rowspan="3">Food Procurement and Food Waste</td><td>T2 From 4 April 2024 a minimum of 10% by value (€) of food sought by public sector bodies under new contract arrangements (including via contractors such as canteen service providers), is to be certified organic in each of the following categories of Cereals, fresh Beef, Lamb, Pork, Poultry, Fish, Vegetables and Dairy products, where possible.</td></tr><tr><td>T3 From 2025, 100% of new contract arrangements related to canteen or food services to include measures that are targeted at addressing food waste, with a specific focus on food waste prevention, taking into account Ireland’s commitment to reduce food waste by 50% by 2030, and food waste segregation.</td></tr><tr><td>T4 From 2024, 100% of new contract arrangements related to canteen or food services (including food services for public sector organised conferences) to cease using disposable/single use cups, plates and cutlery from any public sector canteen, closed facility, and public sector organised conferences, excluding clinical (i.e., non-canteen healthcare) environments.</td></tr><tr><td>ICT equipment</td><td>T5 By 2025, a minimum of 80% of ICT end user products (desktop computers, portable computers and mobile phones) procured by public sector bodies under new contract arrangements are certified to EPEAT Gold Standard (or equivalent), TCO Certified (or equivalent) or will have been remanufactured.</td></tr></table>	Category	Targets	Food Procurement and Food Waste	T2 From 4 April 2024 a minimum of 10% by value (€) of food sought by public sector bodies under new contract arrangements (including via contractors such as canteen service providers), is to be certified organic in each of the following categories of Cereals, fresh Beef, Lamb, Pork, Poultry, Fish, Vegetables and Dairy products, where possible.	T3 From 2025, 100% of new contract arrangements related to canteen or food services to include measures that are targeted at addressing food waste, with a specific focus on food waste prevention, taking into account Ireland’s commitment to reduce food waste by 50% by 2030, and food waste segregation.	T4 From 2024, 100% of new contract arrangements related to canteen or food services (including food services for public sector organised conferences) to cease using disposable/single use cups, plates and cutlery from any public sector canteen, closed facility, and public sector organised conferences, excluding clinical (i.e., non-canteen healthcare) environments.	ICT equipment	T5 By 2025, a minimum of 80% of ICT end user products (desktop computers, portable computers and mobile phones) procured by public sector bodies under new contract arrangements are certified to EPEAT Gold Standard (or equivalent), TCO Certified (or equivalent) or will have been remanufactured.	
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Initiative Theme	Description		Timeframe
	Category	Targets	
	Textiles	T6 By 2027, polyester fibre products procured by public sector bodies under new contract arrangements must be manufactured using a minimum recycled content of 20%, where possible and proportionate.	
	Paper products and Printing	T7 From May 2024, where office paper for printing and photocopying must be procured, 100% of the paper must be recycled paper.	
	Energy related products, Heating Equipment, Indoor and Outdoor Lighting	T8 From January 2025, 100% of all tenders for the public procurement of energy related products, heating equipment, or indoor and outdoor lighting to include a requirement for tenderers to specify recommendations and options for the product, when the product or components of the product comes to the end of life, that consider environmental sustainability, including options for reuse, repair, and recycling.	
		T9 100% of all tenders for the public procurement of heating systems to not install heating systems that use fossil fuels, in (1) new buildings, and (2) “major renovation” retrofit projects (as defined in the Energy Performance of Buildings Directive (EPBD)) subject to exceptions as specified in the Public Sector Climate Action Plan Mandate 2023.	
	Indoor Cleaning Services	T10 From January 2025, 100% of all tenders for the public procurement of indoor cleaning services to include a requirement for tenderers to specify the training that will be put in place to ensure that all staff involved in delivery of the contract have the knowledge and skills to apply cleaning methods, which will reduce the environmental impact of the services.	
	Road Transport Vehicles	T11 100% of all tenders for the public procurement of vehicles to procure zero emissions vehicles only, subject to exceptions as specified in the Public Sector Climate Action Plan Mandate 2023.	
	Reuse and Repair	T12 By end of 2027, where possible and available, a minimum proportion of annual procurement by public sector bodies shall include used or repaired goods or materials. ⁷	

⁷ Availability of used or repaired goods will be informed by the national network to support and scale reuse and repair in Ireland that has been established by the EPA.

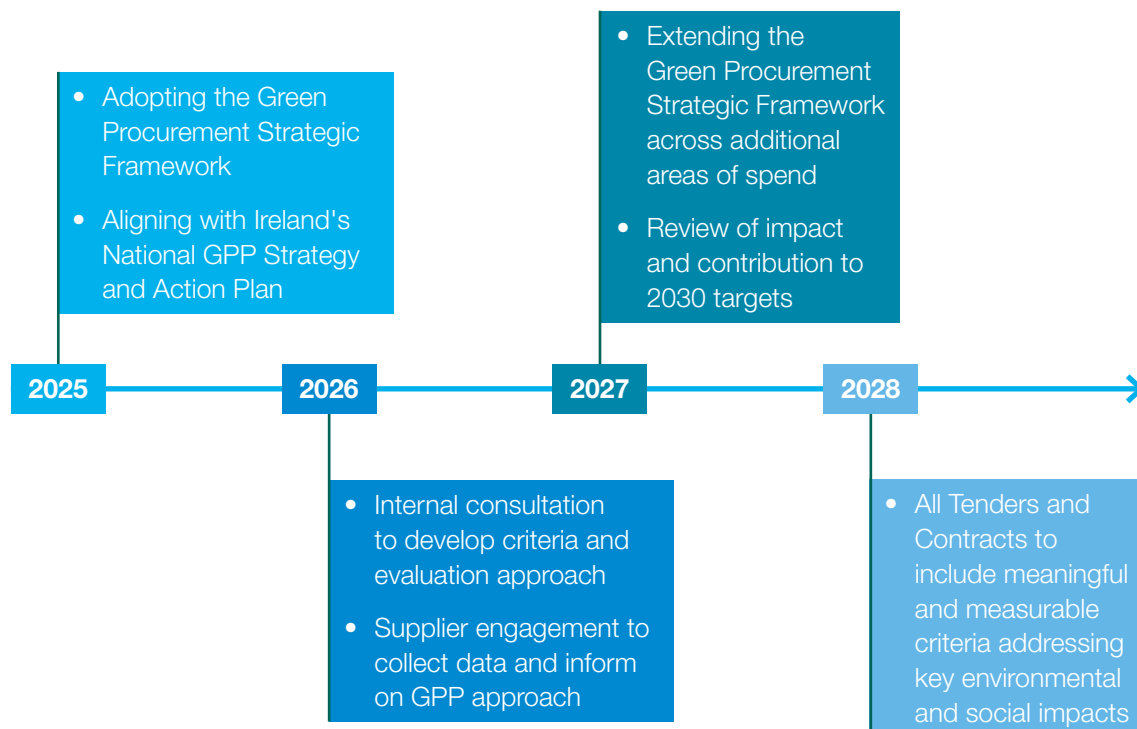
Initiative Theme	Description	Timeframe
Reporting arrangements	<p>The following forms of reporting will be undertaken by the HSE under this Framework. These reflect the requirements set out in Circular 17/2025 and Ireland's National GPP Strategy and Action Plan, as well as the HSE Climate Action Strategy.</p> <p>SEAI Monitoring & Reporting system</p> <ul style="list-style-type: none"> • All contracts valued above the national advertising threshold: an explanation must be provided if GPP criteria are not included in any tender where national criteria are available • Contracts above the EU thresholds for purchase or lease of road transport vehicles, and specified service contracts⁸ the percentage of low or zero-emission vehicles procured must be reported • Climate Action Mandate: Reporting on GPP requirements for specific categories, e.g. food and catering, ICT, paper eForms data collection on eTenders • Completion of eForms is mandatory for all tenders published on eTenders, with a number of questions relating to GPP, including application of the Clean Vehicles Regulations, Energy Efficiency Directive, Eco design etc. <p>Annual reporting on the implementation of the HSE Green Procurement Strategic framework</p>	2026
Sustainable Procurement	<p>Prioritising low carbon pharmaceuticals suppliers:</p> <ul style="list-style-type: none"> • Optimised use of pharmaceuticals • Extending the lifespan of medical equipment • Shift to low carbon inhalers • Shift to low carbon anaesthetic gas equivalents • Reduce plate waste and optimise food purchasing <p>Involves requesting Environmental Product Declarations (EPDs) or sustainability data during the procurement process for pharmaceuticals, aiming to aid selection of lower carbon alternatives.</p> <p>Prioritising low carbon medical equipment suppliers: Engaging with key suppliers of medical equipment to ensure that carbon associated with products is a key consideration in procurement. Through requesting Environmental Product Declarations and other information when selecting products and suppliers, procurement teams can select suppliers with lower emission products.</p>	2027
Waste	<ul style="list-style-type: none"> • Reduce plate waste and optimise food purchasing • Reduce the volume of waste generated and the emissions intensity of the treatment methods 	

⁸ This includes service contracts for passenger transport, refuse collection, parcel and mail transport or delivery.

Initiative Theme	Description	Timeframe
Suppliers	<p>Develop a Supplier Sustainability Questionnaire to identify current levels of activity under 4-5 headings (e.g. Climate, Energy, Resource Use/Circular Economy/Waste, Water, Social Risks and Benefits). The findings from this questionnaire should serve as a valuable input when developing award criteria.</p> <p>Supplier decarbonisation standards:</p> <p>Mandate that suppliers have validated science-based target-aligned decarbonisation strategies consistent with achieving net zero by 2050. If suppliers adopt and deliver against these targets, decarbonisation progress can be driven across the full health care value chain.</p>	2027
Training	<p>Develop and deliver training to Procurement Strategic Sourcing & Contracting (“SS & C”) portfolios on integrating comprehensive and compliant Green Public Procurement (“GPP”) and sustainability criteria into HSE tender documents.</p> <p>The training will also focus on how each portfolio will include, monitor and report GPP for tenders in line with the GPP Strategy and Action Plan 2024-2027, EPA Green Public Procurement – Guidance for the Public Sector, Circular Economy Strategy & Carbon Footprint/Greenhouse gas emissions tenders.</p>	2026
Communications	Ongoing, targeted communication on green procurement to encourage positive behavioural change and highlight successful initiatives and stories as they occur.	Ongoing
HSE Corporate Procurement Plan	Ensure that the HSE Green Procurement Strategic Framework is fully aligned with the HSE Corporate Procurement Plan 2025–2027, which strengthens the HSE’s commitment to sustainable and greener public procurement by embedding environmental criteria and promoting responsible purchasing practices across all procurement activities. This alignment will enable effective delivery of green procurement priorities and reinforce the HSE’s leadership in advancing environmentally responsible healthcare procurement.	2025-2027
Climate Action Strategy Priority Areas of Focus	Procurement will collaborate with Climate Action Strategy Priority Area Owners to establish requirements and ways of working to enable procurement support in order to progress the respective programmes of work where appropriate. These areas include Transport, Greener Models of Care, Mobility and Waste Management.	2023-2050 Climate Action Strategy
Scope 3 Supply Chain Carbon Footprint	<p>HSE Procurement to publish a Scope 3 Supply Chain Carbon Footprint report on an annual basis (subject to funding)</p> <p>HSE Procurement are committed to producing an annual Scope 3 roadmap to demonstrate position in terms of Scope 3 supply chain emissions</p>	2027
Enhancing Logistics and Inventory Management through Green Procurement	<p>Progress and implement new digital inventory systems to minimise overstock and waste by progressing:</p> <ul style="list-style-type: none"> NDC Voice Picking Upgrade Solution (subject to funding approval) Point of Use Scanning Solution Project <p>Continue NDC rollout (subject to funding and resources)</p>	2025 - 2027

11. HSE Procurement Roadmap

HSE Procurement Roadmap



12. Support for Implementation and Next Steps

This framework explores several tangible recommendations for action across a variety of areas within HSE Procurement. These recommendations must be prioritised, and if enacted they will have a significant part to play in the reduction of HSE emissions. An ongoing process of tracking and monitoring will be implemented to ensure that the programme remains on track, that challenges are addressed and that opportunities for further developments are not missed in conjunction with the Climate Action and Sustainability Programme.

12.1 Implementation Enabler 1

Governance

- The Climate and Sustainability programme will work with the HSE procurement team to assist and ensure implementation of the recommendations set out in this framework and in association with the HSE Regions.

12.2 Implementation Enabler 2

Measurement and Assurance

- The Climate Action and Sustainability Programme will:
 - » Guide measurement plan initially to focus on 2030 target as minimum targets and all other CAP requirements. The Programme will assist regions and healthcare facilities as required.

12.3 Implementation Enabler 3

Communications and Training

- The Climate Action and Sustainability Programme will be supporting regions and services with:
 - » Ongoing communications materials to support action, enable shared learning and awareness in this space.
 - » Various training opportunities such as health sector specific training provided via HSELand and other e-learning platforms, Senior Leadership Sustainability training and Green Team training.
 - » See below a tile developed as part of an internal staff campaign providing staff simple actions that they can take.



We're taking climate action

Sustainable Procurement

- Reduce, Reuse, Recycle.
- Replace disposable items like single use plastic cups and cutlery, with reusable products.
- Responsibility starts with all of us - When requesting supplies, take into account the necessity, packaging and environmental impact.
- Think about equipment you use in work and potential for reducing use or reusing.
- Share ideas for more sustainable products with your management team.
- Think before you buy, for example, for lunch perhaps choose plant-based and items with less packaging.



Advocate for change -

Talk to your colleagues and manager.
Get involved with your local green teams.

#ClimateAction

Visit hse.ie/climateandhealth for more information

Appendix 1

Applicable Legislation

1. Environmental Requirements

Legal instrument	Contracts affected	Requirements
Climate Action and Low Carbon Development Act 2015 (as amended), Section 15	All contracts – in as much as these are part of the functions of a public body ⁹	1. A relevant body shall, in so far as practicable, perform its functions in a manner consistent with— <ol style="list-style-type: none"> the most recent approved climate action plan, the most recent approved national long term climate action strategy, the most recent approved national adaptation framework and approved sectoral adaptation plans, the furtherance of the national climate objective, and the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.
S.I. 284/2016 European Union (Award of Public Authority Contracts), Regulation 18(4)	All contracts above the EU threshold	Contract terms must require the main contractor and any subcontractors/ suppliers to comply with all applicable obligations in the fields of environmental law that apply at the place(s) where the works are carried out or the services provided. ¹⁰
S.I. 284/2016 European Union (Award of Public Authority Contracts), Regulation 69(5)	All contracts above the EU threshold	Abnormally low tenders must be rejected where they do not comply with the environmental obligations set out in Regulation 18(4)
S.I. 339/2011 Clean and Energy-efficient Road Transport Vehicles Regulations as amended by S.I. 381/2021	Above-threshold contracts for the purchase, lease, rent or hire-purchase of road transport vehicles and service contracts for passenger transport, refuse collection, parcel and mail transport or delivery.	At least 38.5% of light-duty vehicles covered by all contracts awarded from 3 August 2021 to 31 December 2025, must be either zero or low-emission (maximum 50 g Co2/km and 80% of Euro emission limits); At least 10% of trucks and 45% of buses must be low or zero emission. ¹¹

⁹ The definition of a public body is that set out in the Freedom of Information Act 2014

¹⁰ This includes applicable national, EU or international law, and the international environmental conventions set out in Schedule 7 of the Regulations.

¹¹ Eligible low-emission technologies are specified in the Directive for trucks and buses: Hydrogen, battery electric, plug-in hybrids, natural gas (CNG/LNG, biomethane), liquid biofuels, synthetic and paraffinic fuels, LPG. Restrictions apply to prevent the use of biofuels associated with land use change as specified in Directive 2018/2001, and

Legal instrument	Contracts affected	Requirements
S.I. 151/2011 Energy Efficient Public Procurement Regulations	All contracts (regardless of value) for a wide range of energy-using equipment (ICT, lighting, HVAC, appliances, building energy management systems, electromechanical systems, vehicles and charging systems)	Public bodies must purchase equipment which, as a minimum, meets the criteria for inclusion on the Triple E Register for the relevant categories. ¹²
S.I. No. 426/2014 European Union (Energy Efficiency) Regulations	Contracts for purchase/ lease of buildings, energy audits, energy-using equipment and tyres.	Public sector is required to demonstrate exemplary energy management and undertake energy audits every four years. Central government must only procure highly energy-efficient equipment. ¹³
S.I. No. 393/2021 - European Union (Energy Performance of Buildings) Regulations 2021¹⁴	New and existing buildings or major building renovations	Requirements to install building automation and control systems, self-regulating devices for heat generation/temperature regulation, and electric vehicle charging points.
Regulation (EU) 2023/1542 concerning batteries and waste batteries	Above-threshold contracts which include any type of battery or accumulator (e.g. ICT devices, vehicles, light means of transport)	Technical specifications and award criteria must take account of the environmental impacts of batteries over their life cycle, with a view to ensuring that such impacts are kept to a minimum. Additional public procurement criteria may be defined by the Commission.
Net Zero Industry Act Regulation (EU) 2024/1735	Above-threshold contracts for 'net zero technologies' as defined in Article 4 of the Regulation. ¹⁵	At least one of the following requirements must be applied in works contracts: <ol style="list-style-type: none"> 1. Social or employment-related conditions; 2. Compliance with cybersecurity; or 3. Obligation to deliver on time. Additional minimum mandatory requirements will be defined by the Commission in 2025.

to prevent the blending of liquid biofuels, synthetic and paraffinic fuels with conventional fossil fuels.

- 12 To ensure adequate competition in a public procurement process, this requirement does not apply where, in the opinion of the public body concerned, there is, or is likely to be, an insufficient amount or number, as the case may be, of equipment or vehicles either listed on the Register or likely to satisfy the SEAI energy efficiency criteria.
- 13 A revised Energy Efficiency Directive was adopted in 2023 (Directive EU 2023/1791), which will extend requirements to purchase highly energy efficient buildings, products and services to all contracting authorities and entities. The deadline for implementation in Irish law is October 2025.
- 14 A revised Energy Performance of Buildings Directive was adopted in 2024 (Directive (2024/1275), which introduces higher standards, such as all new public buildings being zero emission and requirements to install solar panels. These requirements will be phased in between 2026 and 2029.
- 15 This includes e.g. solar technologies, including PV, solar thermal electric and solar thermal technologies; onshore wind and offshore renewable technologies; battery and energy storage technologies; heat pumps and geothermal energy technologies; hydrogen technologies, including electrolyzers and fuel cells; sustainable biogas and biomethane technologies; and other renewable energy technologies. Electric vehicle charging equipment is also included in the proposed Appendix.

2. Social requirements

Legal instrument	Contracts affected	Requirements
S.I. 284/2016 European Union (Award of Public Authority Contracts), Regulation 18(4)	All contracts above the EU threshold	Contract terms must require the main contractor and any subcontractors/ suppliers to comply with all applicable obligations in the fields of social and labour law, including collective agreements, that apply at the place(s) where the works are carried out or the services provided. ¹⁶
S.I. 284/2016 European Union (Award of Public Authority Contracts) Regulation 42(4)	All procurement above the EU threshold which is intended for use by natural persons.	Technical specifications must take into account accessibility criteria for persons with disabilities or design for all users.
S.I. 284/2016 European Union (Award of Public Authority Contracts), Regulation 69(5)	All contracts above the EU threshold	Abnormally low tenders must be investigated and rejected where they do not comply with the social or labour obligations set out in Regulation 18(4)
Human Rights and Equality Commission Act 2014, Section 42	All contracts – see guidance from IHREC confirming that the Public Sector Equality and Human Rights Duty applies to procurement/ contracting	A public body shall, in the performance of its functions, have regard to the need to— <ul style="list-style-type: none"> • Eliminate discrimination. • Promote equality of opportunity and treatment of its staff and the persons to whom it provides services; and • Protect the human rights of its members, staff and the persons to whom it provides services.
S.I. No. 358/2020 - European Union (Accessibility of Websites and Mobile Applications of Public Sector Bodies) Regulations 2020	All websites and mobile applications of public sector bodies (no minimum contract value applies)	Public bodies must take necessary measures to make their websites and mobile applications more accessible by making them perceivable, operable, understandable and robust. An accessibility statement and feedback mechanism must be provided.
S.I. No. 131/2003 - European Communities (Protection of Employees on Transfer of Undertakings) Regulations 2003	Any transfer of an undertaking, business or part of an undertaking or business from one employer to another (this may result from a tender procedure)	Where TUPE may apply, the principles of equal treatment and transparency require the contracting authority to provide information to bidders regarding the scope of obligations which a new operator would have to take on.
Work-life Balance and Miscellaneous Provisions Act 2023	The Act creates obligations on employers (public or private sector) – these may need to be reflected in the terms of public contracts	New requirements apply regarding parental and carer leave, right to request remote working or flexible working arrangements.

¹⁶ This includes applicable national, EU or international law or collective agreements, and the core ILO conventions as set out in Schedule 7 of the Regulations.

Appendix 2

Reporting Arrangements

The following forms of reporting will be undertaken by the HSE under this framework. These reflect the requirements set out in Circular 17/2025 and Ireland's National GPP Strategy and Action Plan, as well as the HSE Climate Action Strategy.

Form of Reporting	Scope	Responsibility	Time Required
SEAI Monitoring & Reporting system	<ol style="list-style-type: none"> 1. All contracts valued above the national advertising threshold: an explanation must be provided if GPP criteria are not included in any tender where national criteria are available 2. Contracts above the EU thresholds for purchase or lease of road transport vehicles, and specified service contracts¹⁷: the percentage of low or zero-emission vehicles procured must be reported 3. Climate Action Mandate: Reporting on GPP requirements for specific categories, e.g. food and catering, ICT, paper 		
eForms data collection on eTenders	Completion of eForms is mandatory for all tenders published on eTenders, with a number of questions relating to GPP including application of the Clean Vehicles Regulations, Energy Efficiency Directive, Eco design etc. ¹⁸		
Annual reporting on implementation of the HSE Green Procurement Strategic Framework			

¹⁷ This includes service contracts for passenger transport, refuse collection, parcel and mail transport or delivery.

¹⁸ See guidance on eForms, including the GP-related fields at <https://www.gov.ie/en/office-of-government-procurement/publications/eforms/>

Appendix 3

Resources and Responsibilities

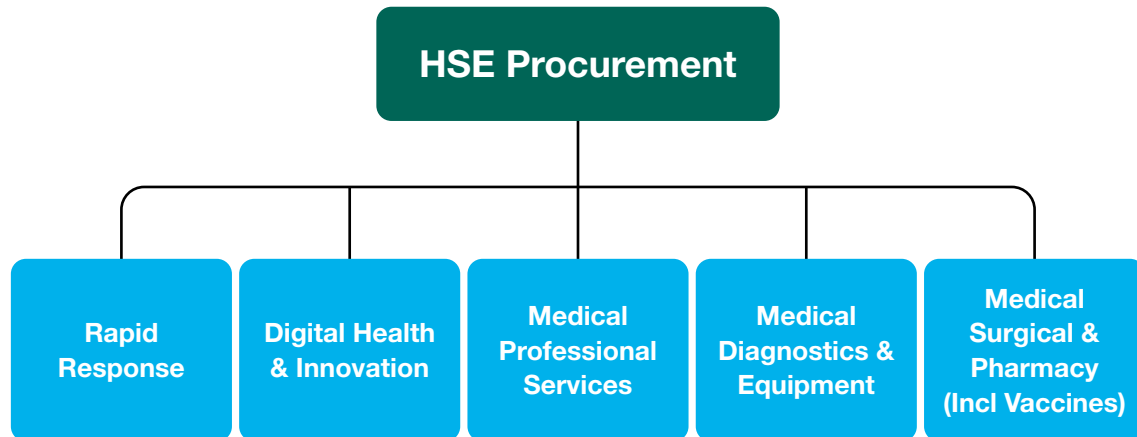
Action	Scope	Timeline	Resource Requirement	Responsibility	Reporting
Ensuring compliance with Appendix 1 legislation	All tender documents and contracts issued by or on behalf of HSE will include applicable provisions	From relevant date of application of each legal instrument	3 days to review templates; 0.2 days per tender/contract to check compliance		
Carrying out market engagement on sustainability criteria prior to tender	All tenders if there is doubt regarding market capacity to meet sustainability criteria	Between 6 and 1 months prior to publication of tender	3 days per tender to implement; 2 days per year to report on/ review market engagement strategy		
Identifying relevant sustainability criteria for each tender	All tenders within scope will include targeted criteria and contract terms which address the main environmental and social impacts of the specific goods, services or works being purchased	Prior to issuing contract notice and tender documents	1 day per tender to identify and apply appropriate criteria; 0.2 days per tender for evaluation/ verification; 2 days per year to report/review		
Life-cycle costing to be applied in all relevant procurements, or a justification provided	The use of LCC will be considered for all contracts and frameworks in which more than 10% of the total cost of ownership is expected to arise after the point of purchase	Prior to issuing contract notice and tender documents	2 days per tender to identify and apply appropriate LCC methodology; 0.3 days per tender received for evaluation/ verification; 2 days per year to report/review		

Action	Scope	Timeline	Resource Requirement	Responsibility	Reporting
Contract terms to reflect sustainability commitments	All contracts and frameworks will include specific clauses highlighting the commitments made by the successful tenderer in response to the sustainability criteria, together with clear requirements for monitoring, reporting, escalation and remedies in case of non-performance.	Prior to issuing the contract notice and tender documents	1 day per tender to draft appropriate contract clauses (initially – this will be less for repeated requirements); 2 days per year per contract/framework to ensure compliance; 2 days per year to report/review		
Contract management	All sustainability commitments in tenders will be monitored with performance issues identified and resolved	Continuous during the contract period	Variable – depending on size, value, and nature of sustainability commitments		

Appendix 4

Overview of Strategic Sourcing and Contracting Portfolios

HSE Led Categories



The HSE leads on the procurement for health sector specific categories and unique health needs which are not addressed within other sector led categories.

HE