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N O R D I C W O R K I N G P A P E R S

The Nordic Swan

Possibilities and limitations for synergies with Green Public
Procurement before 2014

Charlotte Leire, Thomas Lindqvist and Åke Thidell

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The Nordic Swan:
Possibilities and limitations
for synergies with Green
Public Procurement before
2014

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Preface

This report was initiated and conducted as input to the discussions based on the “Vision 2015” document for the Nordic Swan that explicitly states a wish to find ways to make use of ecolabelling in the green public procurement (GPP) setting. In that light, the overall purpose of this report is to explore possibilities to enhance a systematic exchange of environmental knowledge between ecolabelling and green procurement. The discussions in this report are centred around the similarities and differences in the two systems with regards to the procurement processes, on the one hand, as well as the criteria information that becomes relevant in setting environmental requirements, on the other.

In 2014, the Directive (2004/18/EG) on public procurement was revised and replaced by Directive (2014/24/EU). The change enabled contracting authorities, for instance, to apply environmental and social performance requirements and using ecolabels as means for verification. Some of the restrictions in using ecolabelling in GPP mentioned in this report may thus not be valid while the discussion on the relation between the two policy instruments as such still is considered relevant.

The project was financed by the Nordic Council of Environmental Ministers’ (NCM) working group for sustainable consumption and production (HKP-gruppen). The project has been divided into chronological and methodological sections: 1. a literature review on which interviews were conducted with key actors from ecolabelling and green public procurement organizations, 2. a preliminary report 3. a workshop with invited actors to discuss focus areas identified in the preliminary report, 4. a comparative review of criteria documents for selected product groups, and 5. a final report discussing the outcomes from the workshop.

The authors would like to thank those who participated in interviews for the preliminary report, and also all the participants in the workshop. A special thank you is given to Stefán Gíslason at Environice for his valuable support and input to this project.

Based on this report, it is the authors’ wish that the findings can be used to illustrate the potential contributions of the Swan in GPP efforts in the Nordic countries and to bring fruits for the next level of discussion and work on the topic.

The authors

Åke Thidell, Thomas Lindhqvist and Charlotte Leire, IIIIE at Lund University.

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Summary

Ecolabelling is a voluntary method of environmental performance certification and labelling which is practised around the world. As a policy instrument, ecolabelling aims at stimulating environmentally sounder products by guiding consumers' choices. Similarly to ecolabelling, Green Public Procurement (GPP) serves as a voluntary instrument guiding the market towards sounder consumption of products and services. The main rationale for GPP is the significant portions of the public budgets that are spent on procurement should be used for environmentally preferable alternatives.

It is clear that GPP is considered important and has a strong policy support in the Nordic countries as well as in the European Union. In the EU, there is a strive towards more formalised coordination between the EU Ecolabel and the European GPP mechanism.

This report was initiated and conducted as input to the discussions based on the "Vision 2015" document for the Nordic Swan ecolabel, a document that explicitly states a wish to find ways to make use of ecolabelling in the green public procurement setting. In light of that document, the overall purpose of this report is to explore possibilities and limitations to enhance a systematic exchange of environmental knowledge between ecolabelling and GPP and thus gain cost saving synergy effects. The specific questions raised in the study are:

- Where are the potential synergies between ecolabelling and GPP?
- How can ecolabelling contribute to GPP in practice?
- Which issues are relevant for that contribution?
- What are the possible limitations and opportunities for greater synergy between ecolabelling and GPP?

For the data collection for this report, four main activities have taken place, organised as follows:

- Literature review and expert discussions resulting in a background report
- Workshop
- Criteria analysis
- Compilation of results, complementary literature review, and overall analysis

We notice that the ecolabel has played a role in Nordic GPP for many years in various ways. Practitioners in the ecolabelling and the different national GPP systems have knowledge about each other's systems, how they work and exchanged information. In addition, the systems have to a large extent overlapping environmental scope and requirements in product group specific criteria though basically without any formal alignments. Moreover, some municipalities have used ecolabelling criteria as a reference point when they have developed own green requirements and some purchasers have asked for compliance with ecolabelling criteria for the product in question without demanding labelled products per se.

There are potentials for further synergies in criteria development between the Nordic ecolabel and national GPP mechanisms. Ecolabelling appears to be most relevant in the following six areas of GPP practices:

- Product group definitions
- Environmental requirement
- Scope of environmental aspects
- Criteria formulation
- Reference to ecolabelling criteria
- Verification

Further cooperation could bridge knowledge in several aspects: product-related environmental information and potentials for environmental improvements and suitable requirements. Shared views among larger actor groups could also enhance consensus on more strategic and goal-oriented requirements leading to more significant environmental product improvements. Thus, the more or less informal communication and exchange of information could, if found desired, be formalised at different levels:

- Formalised and structured interaction and information exchange for updates on current activities, information sources and, in case relevant, sharing knowledge.
- Common and synchronised criteria development and revision processes as formalised cooperation for relevant product groups. This kind of interaction could foster an increased coordination of national requirements but may leaving setting final requirements to the national GPP organisations.
- Using ecolabelling information and criteria for GPP requirements with the aim of harmonising the GPP criteria development processes based on core criteria from the Nordic ecolabelling scheme. Ecolabelling criteria documents are often extensive pieces of text, including many requirements written in technical jargon but could be condensed to a smaller number of such core criteria, which would be

more useful in GPP. By proposing different levels of ambition in the GPP criteria (basic, advanced and spear-head), they can be applicable for most public actors and stringency requirements.

- An independent Nordic GPP mechanism developed by the ecolabelling scheme: The Nordic ecolabel could develop a GPP mechanism based on core criteria for the Nordic market decoupled from the present national GPP initiatives.

The two latter could be seen as Nordic adaptations of the parallel criteria development and revision process that is gradually applied in the EU.

When considering a higher level of formalisation or harmonisation of the systems, there are some challenges to overcome for further synergies:

- Adjustments of national practices: In the Nordic countries, the development and dissemination of GPP requirements are spread on several actors applying different practices. These are often linking their information to both national environmental policies, GPP mechanisms in other Nordic and European countries, as well as to the EU GPP criteria.
- Pace of processes: Currently, the criteria development and revision processes for the individual product groups are not synchronised between the Nordic Swan and the different national GPP systems. In addition, time needed for the different kinds of processes may hinder the synergy of parallel criteria development and revision processes.
- Ecolabels as means for verification: There are principal differences in the verification processes between ecolabelling and GPP-requirements. Ecolabelled products are checked by a third part while suppliers state compliance with requirements in case of GPP.
- Financing: All organisations work under strict budgets and need to prioritise production before seeking new ways of working. In case of the Nordic Swan, developing GPP criteria or working outside the given mandate cannot be justified if it does not pay back as a greater number of licenses or compensation by other means.

Sammanfattning

Miljömärkning innebär en frivillig metod för certifiering och märkning av produkters miljöprestanda som praktiseras runt om i världen. Som ett politiskt styrinstrument syftar miljömärkning till att premiera miljömässigt sundare produkter genom att erbjuda konsumenter vägledning. Liksom miljömärkning fungerar Miljöanpassad Offentlig Upphandling (MOU) som ett frivilligt instrument för att styra marknaden mot miljömässigt sundare varor och tjänster. Grundtanken för miljöanpassad offentlig upphandling är att rikta de betydande summor som används för offentlig konsumtion av varor och tjänster mot de marknadssegment som innebär miljömässigt fördelaktiga alternativ.

Miljöanpassad offentlig upphandling har ett starkt politiskt stöd och anses viktigt i de nordiska länderna såväl som inom EU. Inom EU finns det en strävan mot mer formaliserad samordning mellan EU:s miljömärke och det europeiska initiativet för miljöanpassad offentlig upphandling.

Denna rapport har initierats och genomförts som underlag för de diskussioner som följt av den nordiska miljömärkningen Svanens "Vision 2015" som uttryckligen önskar att hitta sätt att använda sig av miljömärkning i miljöanpassad offentlig upphandling. Mot denna bakgrund är det övergripande syftet med denna rapport att undersöka möjligheter och begränsningar för att förbättra ett systematiskt utbyte av kunskap och erfarenhet mellan miljömärkning och GPP och därmed nå resurseffektiva synergier. De specifika frågor som tas upp i studien är:

- Var finns de potentiella synergier mellan miljömärkning och miljöanpassad offentlig upphandling?
- Hur kan miljömärkning bidra till miljöanpassad offentlig upphandling i praktiken?
- Vilka aspekter kan ge relevanta bidrag?
- Vilka begränsningar och möjligheter föreligger för ökad samverkan mellan miljömärkning och miljöanpassad offentlig upphandling?

Underlaget för denna rapport bygger på fyra huvudaktiviteter organiserade enligt följande:

- litteraturstudie och expertintervjuer som sammställts i en bakgrundsrapport
- en workshop med berörda aktörer

- kriterieanalys
- sammanställning av resultat, kompletterande litteraturgenomgång och övergripande analys

Vi noterar att miljömärkningen på olika sätt har spelat en roll för miljöanpassad offentlig upphandling i de nordiska länderna under många år. Medarbetare inom miljömärkningen och i de olika nationella initiativen för miljöanpassad offentlig upphandling känner till varandras system, hur de fungerar och har utbytet information. Dessutom överlappar systemen till stor del i både produktgrupper och i kriteriernas miljökrav utan några formella anpassningar. Dessutom har vissa kommuner använt miljömärkningskriterier som en referenspunkt när de har utvecklat egna miljökrav och en del inköpare har efterfrågat produkter som lever upp till miljömärkningens kriterier utan att för den skull kräva miljömärkta produkter.

Vi noterar att det finns potential för ytterligare synergier mellan den nordiska miljömärkningen och de nationella systemen för miljöanpassad offentlig upphandling. Miljömärkning uppfattas kunna bidra inom följande sex områden:

- Produktgruppsdefinitioner
- Miljökrav
- Identifiering och omfattning och av miljöaspekter
- Formulering av kriterier
- Referenspunkt
- Verifiering av miljökrav

Ytterligare samarbete kan överföra erfarenheter och kunskaps inom flera aspekter: produktrelaterad miljöinformation, potential för miljöförbättringar samt ändamålsenligt formulerade miljökrav. Samlade bedömningar och krav bland större aktörsgrupper skulle också kunna främja samsyn på mer strategiska och målmedvetna krav ledande till mer betydande miljömässiga förbättringar av varor och tjänster. Således kan det befintliga mer eller mindre informella utbytet av information mellan systemen - om det visa sig önskvärt - formaliseras på olika nivåer:

- Formaliserad och strukturerad samverkan och informationsutbyte för ömsesidig uppdateringar om aktuella aktiviteter, informationskällor och, i fall relevant, utbyta av kunskap.
- Formaliserat samarbete för gemensamma och synkroniserade processer för utveckling och revidering av miljökrav för relevanta produktgrupper. Detta utbyte skulle kunna främja en ökad samordning av nationella krav även om de slutliga kraven justeras

och fastställs av de nationella aktörerna inom miljöanpassad offentlig upphandling.

- Miljömärkningens information och kriterier används som underlag för att harmonisera de nationella kraven för miljöanpassad offentlig upphandling i de nordiska länderna genom att identifiera och utnyttja kärnkriterier från Svanens miljökriteriedokument. Miljömärkningskriterierna är ofta omfattande dokument, skrivna med teknisk jargong men som kan kondenseras till ett mindre antal sådana kärnkriterier. Detta bedöms vara mer praktiskt inom miljöanpassad offentlig upphandling. Genom att föreslå olika ambitionsnivåer för kriterierna (t.ex. basnivå, avancerad och spjutspets) kan de bli ändamålsenliga för de flesta offentliga aktörer och ambitionsnivåer.
- Ett oberoende nordiskt system för miljöanpassad offentlig upphandling utvecklas inom ramen för den nordiska miljömärkningen. Det kan baseras på kärnkriterier enligt ovan men helt frikopplad från de nuvarande nationella aktörerna och initiativen för miljöanpassad offentlig upphandling.

De två sistnämnda kan ses som nordiska anpassningar av de parallella processer för kriterieutveckling och revidering som gradvis tillämpas i EU för miljömärkning och miljöanpassad offentlig upphandling.

När man överväger en högre grad av formalisering för att vinna synergieffekter eller harmonisering av de två systemen bör följande utmaningar beaktas:

- Anpassning av nationella arbetssätt: I de nordiska länderna är arbetet med utveckling av och informationsspridning om verktyg för miljöanpassad offentlig upphandling spridd på flera aktörer vilket leder till delvis olika metoder och tillämpningar. De kopplar ofta sin information till nationell miljöpolitik och -prioriteringar, olika delar av andra nordiska och europeiska länders verktyg för miljöanpassad offentlig upphandling i samt till EU:s MOU kriterier.
- Processernas takt och tidsbehov: Idag är inte utvecklings- och revisionsprocesser för de enskilda produktgruppernas kriterier synkroniserade mellan Svanen och de nationella systemen för miljöanpassad offentlig upphandling i de nordiska länderna. Dessutom kan tidsbehoven för de olika processerna hindrar parallell utveckling.
- Miljömärkning som verifikation: Det finns principiella skillnader i verifieringsprocesser mellan miljömärkning och kraven för miljöanpassad offentlig upphandling; miljömärkta produkter kontrolleras av en tredje del medan leverantörerna själva uppger huruvida de uppfyller kraven i fråga om miljöanpassad offentlig upphandling.

- Finansiering: Det åligger den nordiska Svanen att till stor del finansiera sin verksamhet genom olika avgifter. Det kan därmed vara svårt för miljömärkningen att motivera arbete med krav för miljöanpassad offentlig upphandling eller att på annat sätt gå utanför sitt mandat om det inte betalar sig genom ett större antal licenser eller annan ersättning.

1. Introduction

Ecolabelling is a voluntary method of environmental performance certification and labelling which is practised around the world. As a policy instrument, ecolabelling is intended to stimulate environmentally sounder products by guiding consumers to the environmentally preferable choices. The environmental gains of ecolabelling should therefore be to increase the green product market share at the cost of the more polluting products as well as to drive green innovation and cleaner technologies.¹

Similarly to ecolabelling, Green Public Procurement (GPP) functions as a voluntary instrument, encouraged in environmental policy, which should also guide the market towards higher degrees of sustainability. The main rationale for GPP is the significant portions of the national budgets that are spent on public procurement; the portion is usually appreciated to about 15-20% of the GDP in the Nordic countries² and in some other countries it can be substantially more³. In other words, public procurers can influence vast supply chains towards implementing more sustainable practices, achieving environmental, social, and economic policy objectives. As such, GPP is perceived to have the possibility to help drive market developments, promote innovation, and also provides an opportunity for the public sector to “lead by example”.

The idea that it is possible to integrate and make use of ecolabelling in GPP has been mentioned by academics and authorities alike.⁴ For example, it has been suggested that ecolabelling has over time stimulated the adoption of GPP^{5,6}; and, conversely, that GPP has contributed to promoting ecolabelling practices. In particular, the possibilities to stimulate a higher degree of interaction are discussed, for example a Nordic report

1 Bleda, M. and Valente, M. (2009). Graded ecolabels: A demand-oriented approach to reduce pollution. *Technological Forecasting & Social Change*. 76: 512-524

2 European Commission, 2010. Public Procurement Indicators 2010 (2011). Available Online: http://ec.europa.eu/internal_market/publicprocurement/docs/indicators2010_en.pdf [2013-11-28].

3 OECD 2002. The Size of Government Procurement Markets, *OECD Journal on Budgeting*, Vol. 1 No.4.

4 Bergman, I.-M. Ståhlberg, A., Dreyer, R, Standley, M., & Rakel Jonsdottir, E. (2012): Mainstreaming GPP in the Nordic countries – a scoping study. *TemaNord* 2012:504. The Nordic Council of Ministers: Copenhagen.

5 Rabbiosi, L. (2010): Powerpoint presentation: Environmental and sustainability labelling. UNEP. Capacity building seminar: Local strategies for greening jobs and skills . 9-11 June 2010, Trento, Italy Available online: <http://www.oecd.org/dataoecd/47/15/45484690.pdf>.

6 AEA (2010): Assessment and Comparison of National Green and Sustainable Public Procurement Criteria and Underlying Schemes”.

suggested that the Nordic ecolabel (the Swan) could, in theory, contribute to GPP by taking on most of the new development of Nordic GPP criteria.⁷ In case the Swan would not be able to develop criteria for the public purchasers, the authors of the report advocate that the GPP criteria could be “developed at the national level or through Nordic collaboration and be converted into a common Nordic format”.

Regardless of the suggested format for a higher integration, arguments point to potential benefits for many different actors, on a state level as well as in the procuring organisations. These benefits could include cost savings as well as guidance.

The Nordic ecolabel has played a role in GPP for many years in various ways. Some municipalities have used the criteria as a reference point when they have developed own green requirements some organisations have asked for compliance with the criteria for the product in question without demanding labelled products per se.⁸ A number of initiatives have been local or regional, for instance the early Swedish Västernorrland green procurement manual.⁹ Moreover, the Nordic ecolabelling has for instance through the “purchasers’ clubs”, supported professional procurement officers and several of the product groups covered by the Nordic scheme is dedicated to the professional market (both public and private). There is however no full picture of to what extent ecolabelling has been applied in GPP in the Nordic countries.

Current developments of Nordic ecolabelling system indicate a more explicit wish to cater ecolabelling to green procurement. The “Vision 2015” document¹⁰ for the Nordic Swan points to a “stronger support for ecolabelling”. Here it is suggested that the Swan presents environmental criteria for green public procurement as one of its additional services.

On the EU level, moreover, actions have been taken to facilitate a higher level of integration, best exemplified by the criteria development processes for GPP and the EU Ecolabel which since a few years are to some extent harmonised, as explained later in the report.

In light of the stated wishes to achieve higher levels of contributions from the Swan to GPP, to enhance and plan a systematic exchange of

7 NCM (2006): The Environment and Public Procurement Common Nordic Procurement Criteria? TemaNord 2006:599. The Nordic Council of Ministers: Copenhagen.

8 Thidell, Å. (2009): Influences, effects and changes from interventions by ecolabelling schemes - What a Swan can do? PhD Dissertation Thesis. The International Institute for Industrial Environmental Economics (IIIEE). Lund, Sweden.

9 Ibid

10 NCM (2012). The Swan flies high. Available Online:

<http://www.norden.org/en/nordmiljoe/special-issues/2012/the-official-nordic-ecolabel/the-swan-flies-high> [2013-11-28].

environmental knowledge, there is a need for a clarification of what is possible and doable. So far, literature is fairly scarce on explaining the actual possibilities as well as technical and operative implications and limitations.

On behalf of the Nordic Council of Ministers, and with the purpose to fill this knowledge gap, this report sets out to examine possibilities and limitations to potential contributions of the Swan in future GPP efforts in the Nordic countries.

1.1 Purpose

The purpose of the study presented in this report is to find and discuss the possibilities and limitations of using ecolabelling in GPP. Rather than assessing the needs for a closer cooperation between ecolabelling and GPP, the report takes as a starting-point that there are gains to be made with increased cooperation and exchange between ecolabelling and GPP. The specific questions raised in the study are:

- Where are the potential synergies between ecolabelling and GPP?
- How can ecolabelling contribute to GPP in practice?
- Which issues are relevant for that contribution?
- What are the possible limitations and opportunities for greater synergy between ecolabelling and GPP?

1.2 Scope

The focus of the study is the Nordic ecolabelling scheme (the Swan) and the green procurement practices and mechanisms in the public sector in the Nordic countries and in the EU. The theoretical discussion presented in this study consider ecolabelling at large, the data collection and analysis are however limited to the Swan.

For this study, three tiers of actors have been deemed relevant as regards the implementation and dissemination of GPP namely the EU level, the national level, and the procurement level.¹¹ As for the geographical scope of the study, the EU is considered but the Nordic countries are the focus. The EU setting is relevant in that European policy and legal framework sets the legal scope for the possibilities in public procurement, while also promoting European ecolabelling and GPP work. As for the Nordic countries, these are in the report in some chapters consid-

¹¹ This is also the distinction referred to in the Swedish National Action Plan for Green Public Procurement 2007-2009.

ered as a group and in others they are discussed individually. Each Nordic country has its own policies regarding GPP and develops separate practices for the implementation while having the Nordic Swan as a common ecolabelling scheme. In addition to the legal framework, the strategic as well as the operational reality of the procurement practitioners are also considered.

Although the term Sustainable Public Procurement is gaining ground worldwide, GPP is maintained as the key term in this report not least because it is the term still used in the context of the European policy. Similarly, it should be noted that the term “product group”, greatly used throughout the study, refers to both goods and services. In this report searching for synergies (between ecolabelling and GPP), also the terms integration and contribution are used to cover certain angles of potential synergies.

1.3 Method

For the data collection for this report, four main activities have taken place, organised as follows:

- Literature review and expert discussions resulting in a background report
- Workshop
- Criteria analysis
- Compilation of results, complementary literature review, and overall analysis

Expert discussions and a literature review were conducted through telephone interviews for compiling background information and key questions to be addressed in the subsequent workshop. The findings were conveyed in a background report which was distributed to the workshop participant prior to the event.

A workshop held at IIIEE at Lund University in Lund, Sweden, on November 29, 2011. By virtue of its purpose, the ecolabelling scheme in focus was the Swan. The purpose of the workshop was to bring together relevant Nordic actors from the GPP and the Swan, as well as, persons working with policy-making. Participants were chosen based on relevance as discussed with the steering group for the study, and also recommendations from the interviewees. A number of the participants in the workshop also contributed with their input in the initial interview round.

A criteria analysis conducted for this study based on a selection of three product groups: paper products, cleaning products and hotel services. The product groups were selected based on consultation with the project steering group. The purpose of the analysis was to illustrate the similarities and differences between the criteria for GPP and the criteria for ecolabelling. The agreed scope and design of the study does not, however, provide a comprehensive picture of specific requirements and guidelines that readily could be transferred from ecolabelling into GPP practices. The analysis includes the Swan and the Swedish GPP system in all three studies and Danish, Finnish and Norwegian GPP systems in one study each. Tables of comparisons are provided in Appendix 4. The points of comparison reflect the areas of use identified in the previous section.

A final literature helped to reveal a number of issues or limitations with using ecolabelling in GPP. The first area of concern was how the GPP and ecolabelling systems operate. The differences in structures, processes and aims of ecolabelling and GPP provided a number of concerns for increasing the level of cooperation or integration between the two systems. These concerns were then reflected in the final chapters of this report.

A complete list of interview persons and workshop participants, as well as the questions discussed in the interviews, can be found in the appendices. It should also be noted that in the main body of the report, the findings of the data collection activities are only summarised. More detailed information from the information collecting activities can be found in the appendices.

2. GPP and ecolabelling in the Nordic countries: current state and trends

2.1 Ecolabelling and the Nordic Swan

On the Nordic market, a range of different environmentally related product labels are available, such as self-declarations, energy and product declarations, symbols, claims, quality certification labels, logos and rankings, etc. The International Organization for Standardization (ISO)¹² has defined three broad types of voluntary labels, with third party certified ecolabelling fitting under the ISO Type I designation. ISO Type I ecolabels relevant for the Nordic countries include the EU-Flower, the Nordic Swan, the Good Environmental Choice label, and the Blue Angel label.

The most dominant ISO Type I ecolabel on the Nordic market in terms of number of criteria documents is the Nordic Swan, which is also the official ecolabel for the Nordic countries. The Nordic Swan is a voluntary license system where the applicant agrees to follow a certain criteria set which is decided in agreement with industry and reviewed and strengthened on a regular basis. The Nordic Swan was established in 1989 and has grown to comprise environmental criteria for 67 product groups¹³. Today there are more than 6,500 Swan-labelled products¹⁴ distributed over about 1800 licenses awarded to almost 1,000 licence holders on the Nordic market. The number of product groups covered by the Swan has steadily increased in the last few years. The number of product groups targeting the professional consumers has also increased.¹⁵

12 International Organization for Standardization. Available Online : <http://www.iso.org/iso/home.html> [2013-11-02].

13 It should be noted that some of the include sub-groups.

14 It should also be noted that the number of Swan-labelled products on the market is difficult to calculate because the same license could include several product names and variants.

15 Aalto, K., E. Heiskanen, C. Leire, and Å. Thidell (2008): The Nordic Swan: From past experiences to future. TemaNord 2008:529. The third evaluation of the Nordic ecolabelling scheme. The Nordic Council of Ministers: Copenhagen.

2.2 The uptake of GPP in the EU

GPP activities are greatly encouraged on the EU level. In 2003, there was a call to all the EU Member States to create National Action Plans (NAPs) including assessment and targets.¹⁶ Furthermore, in 2008, the European Commission set an indicative target that by 2010, 50% of all public tendering procedures should be “green” for the ten priority products and services.¹⁷

To date, 22 Member States in the EU have adopted National Action Plans or equivalent documents. Almost all of these countries also have adopted criteria, and more than half of them have introduced communication or dissemination activities.¹⁸

However it has been found that among the EU Member States, the uptake of GPP practices differ.^{19,20,21} Studies find a variation in GPP implementation progress among countries, with Sweden, Denmark and Finland ranking among those having the highest degree.

Studies also indicate the GPP activities differ widely between product groups. In one study it was found that the product groups electricity, office, IT and furniture are the ones most frequently subject to green criteria, whereas the product construction, gardening and transport rank the lowest. As will be discussed later in this report, GPP criteria can be set on basic or advanced level (in terms of environmental stringency). The study found that the product groups with the highest the levels of compliance with comprehensive green criteria are cleaning and paper.

Despite the positive trend it is also acknowledged that the potential of GPP is only partially realised.²² In the first progress report from 2011 on the progress of EU Member States meeting the 2010 target, it could be reported that even though there is a positive trend when looking at the

16 The NAPs are not legally binding, although if Member States want to, they can be binding, and allow Member States to choose the options that best suit their political framework and the level they have reached.

17 Public Procurement for a better environment. Com (2008) 400 final. Available online: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2008:0400:FIN:EN:PDF> [2012-10-16]

18 GPP National Action Plans. Available Online: http://ec.europa.eu/environment/gpp/action_plan_en.htm [2013-11-28].

19 Renda et al. (2012). The uptake of green public procurement in the EU27. CEPS and College of Europe. Study to the European Commission.

20 PricewaterhouseCoopers, Significant and Ecofys (2009). Collection of statistical information on green public procurement in the EU.

21 Adelphi (2010). Strategic Use of Public Procurement in Europe. Final Report to the European Commission. MARKT/2010/02/C.

22 CEC (2008a). Commission of the European Communities (2008) Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions - Public Procurement for a better environment. Com (2008) 400 final.

value of contracts as well as in terms of frequency (number of contracts with green criteria), the target was not met.²³

Attention is given to not only the quantity but also the quality of the green procurement practices. According to a study from the Swedish EPA on the progress of GPP, the number of environmental requirements set by procurement organisations is increasing, however, the number of “well-defined” requirements decreased.²⁴

2.3 The uptake of GPP in the Nordic countries

The governments in all the Nordic countries have adopted action plans on GPP. It has, however, been found that the actual level of GPP practices varies considerably between the Nordic countries, both with regard to implementation of GPP in the administrative units and with regard to product groups included.²⁵ Another trait in the Nordic GPP work has been that large local authorities (municipalities) with substantial procurement are committed to GPP. However, these local authorities often modify existing GPP requirements or develop their own. Thus, a number of approaches to implement GPP have been noticed. All Nordic countries except Norway use target setting for achieving GPP objectives. Sweden sets individual targets that are of a qualitative nature.

Below is a description of how each Nordic country structures and operates its GPP mechanism. The main focus in the description is given to those GPP mechanisms that are managed by central authorities in the Nordic countries. It should be noted that there are GPP initiatives and requirements stemming from other organisations that are relevant in these countries, and some but not all of these have been identified for the below descriptions. The information for the table, as regards criteria, ambition level and status of social criteria, is partly extracted from a report commissioned by the European Commission in 2010²⁶ and other referenced sources.

23 EC GPP Homepage. Available online: http://ec.europa.eu/environment/gpp/index_en.htm [2013-11-28]. Available Online: http://ec.europa.eu/environment/gpp/studies_en.htm [2013-11-28].

24 Naturvårdsverket. (2010). Miljöanpassad offentlig upphandling - En fråga om att vilja, kunna och förstå. Stockholm.

25 Bauer et al., 2009. Benefits of Green Public Procurement. Report for the Nordic Council of Ministers. TemaNord 2009:593

26 AEA (2010). Assessment and Comparison of National Green and Sustainable Public Procurement Criteria and Underlying Schemes.

Denmark	
Size of public procurement	Approximately 41 billion euro or 17% of GDP in 2010 ²⁷ .
National policy framework	<p>Adopted 1994 and revised 2008.</p> <p>Sustainable public procurement is a core priority outlined in the Danish Action Plan for CSR (March 2008). The Danish strategy focus on both public and private procurement efforts conjoined in the "Forum for Sustainable Procurement" and the "Partnership for green public procurement".²⁸ The Forum on Sustainable Procurement was established in 2010 by the Minister of the Environment with the aim of promoting environmentally conscious and sustainable procurement by professional buyers of goods and services both in public and private organisations.²⁹ The "Partnership for Green Public Procurement" was established in 2006 by the Ministry of the Environment and the three largest municipalities (Copenhagen, Aarhus and Odense). Since then other municipalities have joined the partnership (the municipalities are responsible for approximately two thirds of public procurement). The Partnership is aimed at developing concrete procurement objectives that constitute a guide for municipalities wanting to incorporate environmental requirements in their procurement practices.³⁰</p>
GPP mechanism/criteria	<p>The Forum for Sustainable Procurement operates a web portal collecting information and links to other initiatives providing for instance criteria and guidelines for the support of public and private professional purchasers.³¹ This portal connects a number of different mechanisms that serve in GPP.</p> <p>The official environmental guidelines are set by the Danish EPA as support for professional purchasers conducting green procurement. There are guidelines for 11 product areas (lighting, building and construction materials, household appliances, ICT equipment, furniture, paper and office equipment, hygiene articles, aid for disabled, transport, printed matter, clothes and textiles, cleaning and laundry) divided into 46 different product groups including both products and services, designed to aid facilitating both large and small purchase situations.³²</p> <p>The Danish Nature Agency has separately developed guidelines to help professional purchasers to buy legal and sustainable wood-based products, such as wood, boards, paper and similar products.³³</p>

27 European Commission, 2010. Public Procurement Indicators 2010 (2011). Available Online: http://ec.europa.eu/internal_market/publicprocurement/docs/indicators2010_en.pdf [2013-11-28].

28 Danish Ministry of environment. Available Online:

<http://www.mst.dk/English/Sustainability/scp/> [2014-02-06]

29 Danish Ministry of environment. Available Online:

http://www.mst.dk/English/Sustainability/scp/sustainable_procurement/forum_on_sustainable_procurement.htm [2014-02-06]

30 Danish Ministry of environment. Available Online:

http://www.mst.dk/English/Sustainability/scp/sustainable_procurement/partnership_for_GPP.htm [2014-02-06]

31 Forum for Sustainable Procurement. Available Online: <http://www.ansvarligeindkob.dk/> [2013-11-28]

32 Danish EPA Environmental Guidelines (in Danish). Available Online:

<http://www.miljoevejledninger.dk/> [2014-02-06]

33 Danish Nature Agency. New strategy for intelligent public procurement (in Danish). Available Online: <http://www.naturstyrelsen.dk/Naturbeskyttelse/Skov/Miljoet/vejledning> [2014-02-06]

	<p>The Danish Energy Agency has in a similar fashion developed procurement guidelines for energy consuming products (computers and screens, copy machines and printers, server equipment, interactive whiteboards etc., network and office equipment, audio-visual, lighting, ventilation, pumps and motors, household appliances for households and professional use, transports).³⁴</p> <p>The Centre for Green Transport under the Danish Transport Authority is a competence centre working out recommendations and rules for sustainable transport solutions. They issued the first set of recommendations for public purchasers addressing energy efficient and environmentally friendly vehicles in 2010. In 2012, the scope of revised recommendations was limited to purchases of cars and smaller distribution vehicles. Later on recommendations have been added for public purchases of trucks, buses and fuels (petrol and diesel).³⁵</p> <p>The abovementioned Partnership for Green Public Procurement set annual targets for participating organisations both regarding what national guidelines that should be used and some additional performance requirements for selected product areas.³⁶</p> <p>SKI - the National Procurement Ltd. Denmark (Statens og Kommunernes Indkøbs Service) is a centralised procurement organisation has the aim to promote effective public purchasing by establishing framework contracts between the public sector (state, regional, municipal authorities and semi-public organisations) in Denmark and private sector companies. SKI can act as a "central purchasing body" as contracting authority able to award public contracts or conclude framework agreements for works, products and services for other contracting authorities. SKI has a common web site for social procurement building on most of the abovementioned initiatives and employ those when evaluating potential suppliers, products and services for the currently about 50 framework agreements.³⁷</p>
Types of criteria suggested or specified	<p>Voluntary guidelines, procurement agreements, environmental declarations.</p> <p>In the Danish sets of criteria, it is suggested what is most important by presenting the criteria in a prioritized sequence.³⁸</p>
Ambition level	<p>One level of guidance (taken from ecolabels and "should be reasonably high").</p>
Evidence base	<p>Ecolabel criteria and market research.</p>
Status of social criteria	<p>There are initiatives extending the environmental aspect in GPP to inclusion of social responsibility in both public and private professional procurement connected to the portals mentioned above.</p> <p>The Danish Ethical Trading Initiative (DIEH) from 2008 brings together trade unions, business associations, NGOs and busi-</p>

34 Danish Energy Agency (2013). Indkøbsvejledning (procurement guideline) in Danish. Available Online:

http://spareenergi.dk/sites/forbruger.dk/files/contents/publication/indkoebsvejledning-2013/indkoebsvejledning_web_-_05-2013.pdf [2014-02-05]

35 Danish Transport Agency. Centre for Green Transport (in Danish). Available Online: <http://www.trafikstyrelsen.dk/DA/Groen-Transport.aspx> [2013-11-28].

36 Partnership for Green Public Procurement (Grønne indkøb). Available Online: www.gronneindkob.dk [2013-12-12].

37 SKI - the National Procurement Ltd. Available Online: www.ski.dk. [2013-12-12].

38 Norden (2006): The Environment and Public Procurement Common Nordic Procurement Criteria? TemaNord 2006:599. The Nordic Council of Ministers: Copenhagen.

	<p>nesses to promote ethical trade and responsible supply chain management according to the ten principles of UN Global Compact (UN and ILO conventions) among Danish companies and public institutions. DIEH has published guidelines for procurement officers.³⁹</p> <p>“The responsible purchaser” is a web portal (under a common web portal for public procurement in Denmark) initiated in 2013 as a collaboration between a number of actors (Ministry of Business and Growth/Danish Business Authority, Local Government Denmark, Danish Regions, Ministry of Environment, Ministry of Employment, Ministry of Finance, National Procurement Ltd. – Denmark and CABI) with interest in socially responsible public procurement. Under the portal, all sorts of knowledge, national GPP guidelines, EUs GPP criteria, etc. is readily accessible.⁴⁰ The portal has the aim to inspire and empower public purchasers to raise supplier requirements on social responsibility and environmental performance and provide information on ethical requirements, labour right clauses, etc.</p>
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Finland	
Size of public procurement	Approximately 35 billion euro or 19 % of GDP in 2010. ⁴¹
National policy framework	<p>Adopted in 2008.⁴²</p> <p>In 2009, the Finnish Government passed the resolution on Sustainable Choices in Public Procurement. The aim was to encourage central, regional and municipal authorities to do more “sustainable procurement” in order to contribute to climate change, cutting waste and preventing chemical pollution. The Finnish Government has set quantified targets for five main procuring areas: energy, construction and housing, transport, food and catering, and energy-using equipment and services. The corresponding objectives and timelines are that 70% of the central government procurement is sustainable in 2010 and 100% sustainable in 2015, and that 25% of the municipalities and local state government procurement is sustainable in 2010 and 50% in 2015.⁴³ In 2013, the resolution concerning the promotion of new and sustainable environmental and energy solutions in public procurement addressed not least innovative solutions and create incentives for the development and adoption of new clean-tech solutions. The objective of the resolution is to lower energy and material consumption, to reduce harmful environmental</p>

39 Danish Ethical Trading Initiative. Available Online: <http://www.dieh.dk>. [2014-02-06]

40 Utbudsportalen Den ansvarlige inkøber (in Danish). Available Online: www.csr-indkob.dk. [2014-02-06]

41 European Commission, 2010. Public Procurement Indicators 2010 (2011). Available Online: http://ec.europa.eu/internal_market/publicprocurement/docs/indicators2010_en.pdf [2013-11-28].

42 European Commission. Strategic Use of Public Procurement in Europe Adelphi - Final Report to the European Commission. MARKT/2010/02/C. Available Online: http://ec.europa.eu/internal_market/publicprocurement/docs/modernising_rules/strategic-use-public-procurement-europe_en.pdf [2013-11-28].

43 Ministry of Employment and the Economy (2010) Strategic programme for the forest sector, Finnish national public procurement policy for wood-based products. Available Online: http://www.tem.fi/files/28240/Finnish_National_Public_Procurement_Policy_for_Wood-Based_Products_web.pdf [2014-02-05]

	impacts during the entire life cycle of products, services and buildings. ⁴⁴
GPP criteria/mechanism	<p>Since 2008, the organization responsible to support the GPP implementation and dissemination in Finland is Motiva Ltd. It operates a helpdesk, disseminates tools and best practice and provides consultancy on procurement strategy or particular operations. In a database, Motiva offers procurement guides for a number of products under the product areas electricity, heat and energy-saving services, cars and vans, IT equipment, public transport and transport services, construction, food services, textiles, machinery, and lighting. Some of the product areas have certain guides for specified product groups.⁴⁵ Additional product groups are underway.</p> <p>The Finnish GPP guidelines were earlier available in a database called Hymonet, which currently is a closed domain.</p>
Types of criteria suggested or specified	<p>Technical specifications and award criteria.</p> <p>The GPP guidance tool contains YES/NO questions in order to define the most economically advantageous tender. Every yes answer awards one point. Purchasers can change the weighting if they want and/or if they only use some of the questions and not all of them. The guides suggest means for verification.⁴⁶</p>
Ambition level	Basic criteria and advanced criteria.
Evidence base	Market analysis, LCA, primary feedback, guidelines, ecolabels, legislation.
Status of social criteria	There are general basic requirements that could be used as contract performance clauses provided by the Ministry of employment and the economy. Specific requirements are developed for certain product groups, such as coffee, tea, cacao, textiles and fruits. ⁴⁷ The tool also provides suggestions for verification.

⁴⁴ Finland's Environmental Administration. Available Online: http://www.miljo.fi/en-US/Consumption_and_production/Public_procurement [2014-02-05]

⁴⁵ Motiva Procurement advise Database (in Finnish) Available Online: <http://www.motivanhankintapalvelu.fi/tietopankki> [2014-01-30]

⁴⁶ Motiva Procurement advise Database (in Finnish) Available Online: <http://www.motivanhankintapalvelu.fi/tietopankki> [2014-01-30]

Norden (2006): The Environment and Public Procurement Common Nordic Procurement Criteria? TemaNord 2006:599. The Nordic Council of Ministers: Copenhagen.

⁴⁷ CSR-Compass. Available Online: www.csr-kompassi.fi [2014-02-06]

Iceland	
Size of public procurement	Approximately 1.25 billion euros a year ⁴⁸ , which is equal to about 18% of GDP. ⁴⁹
National policy framework	<p>A GPP policy was established as the “Government Policy for Green Public Procurement” in 2009.⁵⁰ The Policy was revised in 2013. The overall objective of the new policy is to constitute an attempt to reduce public procurement's environmental impact, to help public organisations green their operations, and to promote sustainable consumption.⁵¹ The specific aim of this policy is to promote greater competitiveness for Icelandic businesses which offer green options in order to meet public requirements, thereby growing more competitive in light of the ever-increasing demands for greener options.</p> <p>The GPP work in Iceland started in 2004 and is today managed by the Icelandic EPA. Two persons are involved in the work on GPP and ecolabelling, which includes administration, Nordic cooperation, marketing, and information dissemination. The dissemination work is characterised by workshop and training for state purchasers, as well as work on the GPP guidelines that are available online.⁵²</p>
GPP Criteria and guidelines	<p>In Iceland, a web portal for the domestic GPP initiative Vistvæn Innkaup.⁵³ provides information, good examples and GPP criteria from Nordic and European countries as well as the EU. Vistvæn Innkaup has also developed checklists for purchaser in governmental agencies who want to prioritise more environmentally friendly products and services for smaller purchases. These checklists differ from conventional GPP criteria since they rather propose key environmental issues for over 20 different product groups, including among others: cars, diapers, soap and shampoo, tyres, furniture, refrigerators and freezers, light bulbs, printing services, paints, office paper, computer and office equipment, and detergents.⁵⁴ The web portal also refer to the attempt to develop common Nordic GPP covering soap and shampoo, mattresses, hotel services, lighting, white goods, dressings, office paper and envelopes, and toner cartridges.</p>
Other national GPP support	A committee on the promotion of green economy proposes a budget to Work Projects to be increased to speed up progress in this field. ⁵⁵

48 Iceland National Parliament (2011). Strengthening the green economy in Iceland. Althing, Reykjavik. September 2011.

49 Vistvæn Innkaup, <http://www.vinn.is/vistvaen-innkaup> [2014-02-04]

50 Discussion with Elva Rakel Jónsdóttir, Department for Information and Communications, Environment Agency of Iceland, on November 10 2011.

51 Government of Iceland (2013). Green public procurement and green government, Government policy 2013 to 2016

52 Personal interview Birna Helgadóttir from 2011-11-14

53 Available Online: www.vinn.is [2013-11-28].

54 Vistvaen innkaup Smaller purchases, Available Online: <http://www.vinn.is/kaupendur/smaerri-innkaup> [2014-02-05]

55 Iceland National Parliament (2011). Strengthening the green economy in Iceland. Althing, Reykjavik. September 2011.

Norway	
Size of public procurement	Approximately 29 billion euro ⁵⁶ which was equal to about 18% of GDP (2006) (16 % in 2009) ⁵⁷ .
National policy framework	An Action Plan was adopted in 2007. ⁵⁸ Public procurement is governed by the Public Procurement Act, which provides the national legal basis for the implementation of government purchasing, as Norway has undertaken to do under the provisions of the EEA and WTO Agreements. Norway is obliged to follow the EU regulations above the EU threshold value through the EEA agreement. The Ministry of Climate and Environment has outlined priority groups for GPP: Property management and building, including energy use and tropical timber, transport and vehicles (including business travel), ICT equipment, food, textiles (including washing and cleaning), health and hygiene consumer materials (e.g. hygiene products, nappies, skin care), and printed matter and paper, office furniture and supplies, cleaning services and hotel services (national action plan Norway). ⁵⁹
GPP criteria/mechanism	DIFI (Direktoratet for forvaltning og IKT) provides guidelines for a number of product areas: transport, ICT, construction and properties, food and catering, clothes and textiles, officer furniture, office equipment, hotel services, cleaning and laundry services, and health care. There are criteria for separate product groups under each product area. The guidelines contain also criteria which can be set in different levels of ambition. ⁶⁰ A guide on ethical criteria in public sector procurement was launched in 2009. ⁶¹ This guide shows which ethical criteria public institutions may set for their suppliers, at which stage of the procurement process it is appropriate to set the criteria, and how observance of the criteria may be monitored.
Types of criteria suggested or specified	Selection criteria, (supplier qualification requirements), technical specifications, (requirements), award criteria (product) and contract clauses. A complete set of criteria has been prepared, with a request to cross out those the purchasing officer does not want to use. Norway uses “should” requirements, point questions and suggestions regarding which replies should form the basis of calculation of the product’s life cycle costs ⁶² .
Ambition level	Some of the requirements in the criteria documents can be elaborated. There are guidelines for innovation procurement.

56 European Tender Information System (ETISYS) 2007. Public procurement in Norway. Available Online: <http://www.etisys.com/uploads/media/Norway.pdf> [2013-11-28].

57 Royal Norwegian Ministry of Government Administration, Reform and Church Affairs (2011). Green paper on the modernisation of EU public procurement policy – comment from the Norwegian government. Available online: http://www.regjeringen.no/upload/FAD/Vedlegg/Konkurransepolitikk/Anskaffelser/Green_paper_Procurement_policy_Norway.pdf [2011-11-29]

58 European Commission. Strategic Use of Public Procurement in Europe Adelphi - Final Report to the European Commission. MARKT/2010/02/C. Available Online: http://ec.europa.eu/internal_market/publicprocurement/docs/modernising_rules/strategic-use-public-procurement-europe_en.pdf [2013-11-28].

59 Environmental Ministry in Norway. Handlingsplan for miljø og samfunnsansvar i offentlige anskaffelser. Handlingsplan 2007 – 2010. Available Online:

<http://www.regjeringen.no/Upload/MD/Vedlegg/Planer/T-1467.pdf> [2013-11-28].

60 Difi Norway. Available Online: <http://www.anskaffelser.no/tema/miljo/produkt-og-tjenestekomraader> [2013-11-28].

61 ETI Norway. Available Online: www.etiskhandel.no [2013-11-28].

62 Norden (2006): The Environment and Public Procurement Common Nordic Procurement Criteria? TemaNord 2006:599. The Nordic Council of Ministers: Copenhagen.

Evidence base	National priorities, LCA studies to identify 'hot spots' (2008).
Status of social criteria	Social criteria based upon the ILO core conventions are available as contract performance clauses for production in countries with weak recognition of human rights and legislation on labour standards. ⁶³

Sweden	
Size of public procurement	Approximately 69 billion euro or 19 % of GDP in 2010. ⁶⁴
National policy framework	Action plan adopted in 2007. ⁶⁵ On July 15th 2010 the Swedish law on public procurement declared that environmental and social consideration should (earlier "may") be considered when "the nature of the procurement" motivates this. ⁶⁶
GPP mechanism/criteria	The Swedish Environmental Management Council (MSR) ⁶⁷ is the Government's expert body that provides practical assistance on green procurement and in setting environmental and social requirements. The criteria are available within the product areas ICT, buildings and property, cleaning and chemicals, vehicles and transports, office and textiles, electricity and lighting, food, nursing ad care, and services. Each product area comprises of criteria for several product groups and sub-groups. The criteria offer different levels of requirements. ⁶⁸
Types of criteria suggested or specified	Selection criteria (supplier requirements), technical specifications (product requirements), award criteria, contract performance. Sweden has focused a good deal on adaptation to the regulations for public procurement, as well as on limiting the number of requirements in GPP. ⁶⁹
Ambition level	Basic criteria, advanced criteria and spearhead criteria.
Evidence base	Market analysis, environmental review, LCA and stakeholder contribution.
Status of social criteria	Requirements for coffee, tea and cacao, fuels, textiles and leather, pharmaceuticals, fruits and vegetables, wood, and vehicles for personal transports. These requirements are suggested to be used as contract performance clauses. ⁷⁰

Table 1. GPP mechanisms in the Nordic countries

63 DIFI SRPP contract performance clauses. Available online:

http://anskaffelser.no/filearchive/srpp-contract-clauses_9-september-2012_2.doc [2014-02-05]

64 European Commission Public Procurement Indicators 2010 (2011). Available Online:

http://ec.europa.eu/internal_market/publicprocurement/docs/indicators2010_en.pdf [2013-11-28].

65 European Commission. Strategic Use of Public Procurement in Europe Adelphi - Final Report to the European Commission. MARKT/2010/02/C. Available on

http://ec.europa.eu/internal_market/publicprocurement/docs/modernising_rules/strategic-use-public-procurement-europe_en.pdf

66 Frenander, A., & Råsmar, S. (2012). Miljöhänsyn och social hänsyn i offentlig upphandling. Stockholm: Konkurrensverket

67 Miljöstyvningsrådet (Swedish Environmental Management Council). Available Online: www.msr.se [2013-11-28].

68 Naturvårdsverket. (2010). Miljöanpassad offentlig upphandling - En fråga om att vilja, kunna och förstå. Stockholm.

69 Norden (2006): The Environment and Public Procurement Common Nordic Procurement Criteria? TemaNord 2006:599. The Nordic Council of Ministers: Copenhagen.

70 Miljöstyvningsrådet (Swedish Environmental Management Council). Available online: <http://www.msr.se/sv/Upphandling/Socialt-ansvar/Sociala-krav/> [2014-01-04].

2.4 Nordic ambitions to increase the use of ecolabelling in the GPP context

In most of the Nordic countries there are examples of a political intention to make use of ecolabelling in GPP. Recent but not always current policy documents illustrate this. For example, in Norway, the Action Plan 2007-2010 states that “In the case of products for which ecolabelling criteria have been developed (Nordic Swan and EU Flower labels), these criteria must be applied as far as possible” ... and that “GPP criteria should be promoted to facilitate a streamlined set of criteria on the market. The indicative criteria must be formulated so as to help procurers to minimise environmental impacts, while keeping the total life cycle costs of the purchases as low as possible. The recommended criteria should, where compatible with these conditions, underpin as far as possible official ecolabels such as the Nordic Swan and the EU Flower”⁷¹.

In Denmark, an earlier Government Note expressed that “to further develop the role of ecolabels as a “shortcut” to green procurement. This means that the EPA together with Ecolabelling Denmark will help disseminate knowledge on how the Flower and Swan ecolabels can be used by professional buyers as a shortcut to green procurement”⁷².

In Sweden, the intentions can be illustrated with a Note suggesting that “MSR⁷³ and SIS Ecolabelling should synchronize their message towards the target buyers so that connections and differences between the GPP criteria and ecolabels are clear. This should be part of their training and other information to purchasers and other stakeholders”.⁷⁴

Finally, in Iceland, a committee on the promotion of green economy has suggested a certain amount to be repaid to the public agencies for up to 20% of cost of goods and services that meet ecolabelling Type 1 requirements⁷⁵.

71 Norwegian Ministry of the Environment, Norwegian Ministry of Government and Administration and Reform, Norwegian Ministry of Children and Equality. Environmental and Social Responsibility in Public Procurement (Sustainable Public Procurement). The Norwegian Action Plan 2007 – 2010 Short version in English. Available Online:

http://www.regjeringen.no/Upload/MD/Vedlegg/Planer/T-1467_eng.pdf [2013-11-28].

72 Danish Ministry of the Environment. “En styrket indsats for grønne indkøb i 2008-2009”.

Notat. Available Online: www.mst.dk/NR/rdonlyres/983668DF-C73B-4720-8CF1-A32A82AA9B92/ [2012-09-25]

73 The Swedish Environmental Management Council (MSR – Miljöstyrningsrådet).

74 Swedish Ministry of the Environment (2007). Miljöanpassad offentlig upphandling, skr. 2006/07:54. Available Online:

<http://www.regeringen.se/content/1/c6/07/87/09/41eb66db.pdf> [2013-11-28].

75 Iceland National Parliament (2001). Strengthening the green economy in Iceland. Althing, Reykjavik. September 2011.

When it comes to concrete actions, moreover, one early example actually making use of ecolabelling information in GPP is the development of regional GPP guidance tool for Västernorrland County in Sweden. Earlier studies⁷⁶ have explained that this GPP guidance tool was gradually developed with the input from various areas of expertise, including contacts with ecolabelling organisations, partly for insights and partly also to use criteria documents. The main reason was the official position of the Nordic Swan. It was explained that even though the ecolabelling criteria were often seen as much more demanding than necessary for the guidance tool, it was seen necessary to use them as a reference point. The GPP guidance in question used and referred to ecolabelling in a number of ways:

- The product groups covered in the GPP guidance tool overlap with those of available ecolabel criteria
- In the guidance tool, for several product groups, including car polishing, light sources, detergents and cleaning chemicals, certain office equipment, and food products, an explicit recommendation to select ecolabelled products (when offered) is stated
- The guidance tool contains clear references to ecolabelling for the stringency level of the requirements
- In one case (office equipment), a recommendation is that procurement officers should request suppliers to justify any deviation from the criteria outlined by the Energy Star label

The case of the GPP guidance tool for Västernorrland County in Sweden illustrates the influence of ecolabelling on its development. Furthermore, the tool made a mark in the national GPP developments as it was used as input to the first national GPP tool (EKU) which later was transformed into the current national GPP criteria in Sweden.

Already in 2001, the Nordic Council of Ministers stressed the importance of GPP in the strategy for sustainable development and thereby initiated co-ordination efforts so that public buyers in all the Nordic countries could benefit from each other's experience.⁷⁷ As a result, in 2009, The Nordic Council of Ministers published a study that proposed a first set of criteria as examples from the Nordic countries. In the report, eight GPP criteria suggested to serve a common Nordic market for the following product groups were published:

- soap and shampoo
- mattresses

⁷⁶ Thidell, Å. (2009): Influences, effects and changes from interventions by ecolabelling schemes - What a Swan can do? PhD Dissertation Thesis. The International Institute for Industrial Environmental Economics (IIIEE). Lund, Sweden.

⁷⁷ NCM (2001). Sustainable development. New bearings for the Nordic countries. Copenhagen.

- hotel services
- lightning
- whitegoods
- dressings
- office paper and envelopes
- toner cartridges

The suggested GPP criteria were extracted and modified from existing ecolabelling criteria and knowledge and presented with relevant technical specifications, selection and award criteria and means for verification.

It is pointed out in the report that although the original aim was to achieve common Nordic GPP criteria, the different consultation processes in the development of the criteria in the countries prevented this from being realized.⁷⁸ We have not found any further proof that these criteria are in use but may have served as inspiration for other GPP criteria development organisations.

The aforementioned examples together with the multitude of references to the official ecolabelling schemes and their criteria illustrate that statements on and practical use of ecolabelling in GPP practices and tools are noticeable among Nordic authorities, both on central and regional levels.

⁷⁸ Nissinen, A., Sætrang, Ø and Ongre, K., (Editors) (2009). Nordic Cooperation on Green Public Procurement: The First Set of Criteria Examples. ANP 2009:759

3. GPP and ecolabelling in the EU: current state and trends

3.1 Ecolabelling and GPP in the EU

The EU Ecolabel ("The EU Flower") is awarded to products and services with reduced environmental impacts. It is a voluntary scheme laid down in Regulation 1980/2000⁷⁹ and administered by the European Ecolabelling Board (EUEB), which includes representatives from industry, environmental protection groups and consumer organisations. The scheme is backed up by the European Commission, all EU Member States and the other countries of the European Economic Area and has been in operation since 1992. The priority product groups listed in the EU "Ecolabel Work Plan for 2011 – 2015" include among others cars, building components, different services and water heating systems.⁸⁰ Criteria are available for products and services, all non-food and non-medical. The largest product group in terms of product on the market is hard floor coverings, which total more than 33% of EU Ecolabel products.⁸¹ Tissue paper and all-purpose cleaners each represents about 10% and indoor paints and varnishes make up nearly 14%.⁸² The criteria for a particular product group are designed to apply to the best 10-20% of products based on environmental performance. The criteria are meant to focus on the life cycle stages where the product has the highest environmental impact.⁸³ To date, the EU Ecolabel is reported to be found on more than 17,000 products on the market.⁸⁴

Public procurement is mainly regulated by two separate EU directives⁸⁵ that aim to stipulate transparent procedures and provide for fair market conditions for the suppliers in line with the rules of the European Single

79 Regulation (EC) No 66/2010. Available Online: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:027:0001:0019:en:PDF> [2012-11-05]

80 EU Ecolabel Work Plan for 2011 – 2015. Available Online : http://ec.europa.eu/environment/ecolabel/about_ecolabel/pdf/work_plan.pdf [2013-11-28].

81 European Commission. Ecolabel. Facts- and Figures: Available Online: <http://ec.europa.eu/environment/ecolabel/facts-and-figures.html> [2013-11-28].

82 Ibid

83 European Commission. Ecolabel. More about the EU Ecolabel. Available Online : <http://ec.europa.eu/environment/ecolabel/the-ecolabel-scheme.html> [2013-11-28].

84 European Commission. Ecolabel. The EU Ecolabel. Available Online: <http://ec.europa.eu/environment/ecolabel/> [2013-11-28].

85 Directive 2004/18 ("Classical Directive") focuses on contracting authorities and Directive 2004/17 ("Utilities Directive") focuses on entities operating in the water, energy, transport and postal services sectors.

Market. For the individual Member State, procurement contracts above certain threshold values are subject to the Directives; contracts below are subject to national regulation.⁸⁶

The Directives provide the scope of possible action for GPP in the EU, and although they do not prescribe GPP they mention that environmental and social considerations may be included in subject matter, technical specifications, selection and award criteria, and contract performance clauses.⁸⁷

The Procurement Directive in the EU is under revision and a proposal for the revision of the Public Procurement Directive was issued in 2011.⁸⁸ The revision aims, amongst others, to help clarify the possibilities for GPP to include considerations of a social and environmental nature.⁸⁹

Guidance for GPP practices is provided by the European Commission. For now, 10 priority sectors have been identified for greening the public procurement:⁹⁰

- Construction
- Food and catering services
- Transport and transport services
- Energy
- Office machinery and computers
- Clothing, uniforms and other textiles
- Paper and printing services
- Furniture
- Cleaning products and services
- Equipment used in the health sector.

Today, common EU GPP criteria are offered for 21 product/service groups as listed in Table 2. The increased synchronisation between EU GPP and the EU ecolabel is noticeable in two ways.

⁸⁶ Also other parts are (partially) excluded from the directives, e.g. defence. Moreover, the general treaty principles (equal treatment, non-discrimination, transparency etc.) also apply below the thresholds.

⁸⁷ McCrudden, 2004. Using public procurement to achieve social outcomes. *Natural Resources Forum* 28, pp 257–267

⁸⁸ European Commission. for a Directive of the European Parliament and of the Council on public procurement. COM(2011) 896 final 2011/0438 (COD). Available Online: http://ec.europa.eu/internal_market/publicprocurement/docs/modernising_rules/COM2011_896_en.pdf [2013-10-08].

⁸⁹ European Commission. Modernising European public procurement to support growth and employment. Press release IP/11/1580 20/12/2011 Available online: http://europa.eu/rapid/press-release_IP-11-1580_en.htm?locale=en [2013-11-12]

⁹⁰ European Commission. Public procurement for a better environment. Homepage. Available online: http://ec.europa.eu/environment/gpp/gpp_policy_en.htm [2013-11-12]

First, the criteria are available as core and comprehensive, where comprehensive, in terms of stringency, correspond to the stringency of the ecolabelling criteria.

Common EU GPP Criteria	
Copying & graphic paper	Hard floor-coverings
Cleaning products & services	Wall Panels
Office IT equipment	Combine Heat & Power (CHP)
Construction	Road construction & traffic signs
Transport	Street lighting & traffic signals
Furniture	Mobile phones
Electricity	Indoor lighting
Food & Catering services	Waste water infrastructure
Textiles	Sanitary tapware
Gardening products & services	Toilets and urinals
Thermal insulation	

Table 2. The common GPP criteria currently available to EU Member States (2013)⁹¹

The GPP website from the European Commission offers a range of tools and support for procuring entities. A helpdesk for GPP launched in 2010 promotes and disseminates information about GPP, and answers to stakeholders' enquiries.⁹² The European Commission also offers nearly 50 examples and good practices of GPP implementation coming from all member states, monthly GPP news and alerts.⁹³ EU funding is also provided to the ICLEI Procura+ campaign, which advises and supports local authorities and provides information on GPP, such as the "Procura+ Manual" with guidance and criteria to public authorities. The product groups for which this manual provides criteria are construction, IT, cleaning products, food, buses and electricity.

3.2 EU Ecolabelling and GPP integration: from discussions to action

In regards to synergies among environmental policy instruments, the possibilities to enhance synergies are many times mentioned, in both political and academic discussions. Already in 2001 the European Commission stated that ecolabel criteria "could be even more extensively

⁹¹ GPP Homepage. Available online: http://ec.europa.eu/environment/gpp/index_en.htm.

Available Online: http://ec.europa.eu/environment/gpp/studies_en.htm [2013-11-12].

⁹² European Commission. Environment. Helpdesk for GPP. Available Online: <http://ec.europa.eu/environment/gpp/helpdesk.htm> [2013-11-28].

⁹³ European Commission. Environment. GPP Homepage. Available Online: <http://ec.europa.eu/environment/gpp/> [2013-11-28].

used in any situation in which the market needs to identify greener products”.⁹⁴ The European Commission also stated that one of the main reasons for the limited uptake of GPP practices is due to the limited number of established environmental criteria for products and services, such as those provided by ecolabelling schemes.⁹⁵ Similarly, it has also been stated that the EU ecolabel is an “excellent source for finding GPP criteria”,⁹⁶ and that there is an opportunity to promote the role of the EU Ecolabel in sustainable consumption and production (SCP) policy mix and therefore its use as a benchmark in other instruments and policies⁹⁷. Furthermore, the European Commission formulated an ambition to “make use of the environmental criteria that is developed for ecolabels also in other policy contexts, where the ecolabel requirements are considered the “front-runner” or “comprehensive” or “best-performer” requirements”.⁹⁸ The other policies refer to GPP, the Energy-related Products (ErP) Directive, the Ecodesign Directive, and the Environmental Compliance Assistance Programme (ECAP).

Moreover, a stakeholder consultation from the European Commission from 2012 on the possible introduction of EU-wide measures related to Sustainable Consumption and Production indicated a need for further harmonisation of product-related environmental measures and alignment among the existing instruments.⁹⁹ In particular GPP and ecolabel approaches were mentioned, and the need to identify where GPP stands in relation to the ecolabel. The explained reason was to avoid market fragmentation and unnecessary work load.

3.2.1 Roles and connections between relevant environmental policy instruments

Integrated Product Policy (IPP), introduced in the late nineties, was an umbrella term that embrace a number of the product related environmental policies in the EU. The key principles for IPP were to regard the life cycle perspective and to consider the cumulative environmental impacts and to avoid burden shifting or trade-offs resulting to moving environmental impacts along life cycle, as well as to promote measures

94 European Commission 2001. Green paper on integrated product policy (Commission COM (2001) 68 final.

95 Commission of the European Communities (2008). Public Procurement for a better environment. Com (2008) 400 final.

96 European Commission 2008. Green Public Procurement. (GPP) Training Toolkit - Module 1: Managing GPP Implementation.

97 EU Ecolabel Work Plan for 2011 – 2015. Version 1.6 – 06 February 2013.

98 European Commission 2008. Impact Assessment Accompanying the Revision of Regulation (EC) No 1980/2000 of the European Parliament and of the Council of 17 July 2000 on a revised Community ecolabel award scheme. Commission Staff Working Document.

99 European Commission 2012. Synthesis of the stakeholder consultation Delivering more Sustainable Consumption and Production. Technical Report - 2012 – 062.

where it is most effective¹⁰⁰. Since the introduction of IPP the overall frame for this type of initiatives has been labelled “Sustainable Consumption and Production” and a number of environmental policy instrument are included under this label.

It has been claimed that a common way, albeit a very straightforward way, to look at various environmental product policies is to view them as complementary, i.e. that they cover certain environmental aspects, or parts of the life cycle, of a given product group.¹⁰¹ In fact, they are assigned different functions; however these are not always clear.

Studies have addressed the roles among ecolabelling and related policies and instruments. To begin with, compared to legal standards on environmental and social impacts from products, GPP can be viewed as “an instrument that may be used to address issues that are difficult to address through mandatory standards”¹⁰². For example, compared to the Ecodesign Directive,¹⁰³ GPP has the potential to reach further on aspects such as recycling, resource use, toxics, and materials.

Similarly, in comparison with ecolabelling, it has been said that GPP can also act as a wider reaching instrument. The argument here has been that ecolabels are bound by the need to establish certain criteria for defining the product group¹⁰⁴. This can possibly prevent more radical, even such solutions or approaches are better from a sustainability viewpoint. In addition, the ecolabelling criteria set (on biodegradability, recycling etc.) may also be shaped in a way that excludes new or better solutions, also meaning that GPP and other policies and incentives need to act as necessary complement instruments that support more radical solutions.¹⁰⁵

On the other hand, ecolabelling criteria, compared to GPP, can better include considerations to product and process methods (PPMs)¹⁰⁶, e.g.

100 Remmen, A., Andersen, R. D., and Dalhammar, C. (2011). Expanding the Scope of the EuP Directive. *TemaNord* 2011:558. Copenhagen.

101 Dalhammar, C., Machacek, E., and Remmen, A. (Forthcoming). Addressing resource efficiency through the Ecodesign Directive: A review of opportunities and barriers.

102 Bauer et. Al. (2009). Benefits of green public procurement. *TemaNord* 2009:593; Dalhammar, C. and Leire, C. (2012). Miljöanpassad upphandling och innovationsupphandling som styrmedel. Underlagsrapport för Upphandlingsutredningen. IIEE report 2012:1. Lunds universitet.

103 Ecodesign Directive 2009/125/EC

104 Dalhammar, C., Machacek, E., and Remmen, A. (Forthcoming). Addressing resource efficiency through the Ecodesign Directive: A review of opportunities and barriers.

105 Dalhammar, C., Machacek, E., and Remmen, A. (Forthcoming). Addressing resource efficiency through the Ecodesign Directive: A review of opportunities and barriers.

106 The PPMs are among the central issues in the eco-labelling and trade context but will not be further explored in this study.

aspects such as child labour, labour rights, emissions during manufacturing, and cutting of rainforests¹⁰⁷.

In addition to the different roles, some studies have also attempted to look at linkages between different yet related environmental policies and instruments. A study on the scope of EuP Directive, financed by the Nordic Council of Ministers, aimed to explore, among other things, how a common information platform could be ensured, which could feed the setting of requirements for both IPP-instruments, including energy- and ecolabelling, green procurement guidelines and performance requirement. One of the main remarks from the study is that the connections and synergies between the single policy instruments are weak or non-existing, and that a common vision and coherent strategy across the different policy instruments is necessary in order to achieve the goals and ensure a transparent process for all involved stakeholders.¹⁰⁸ Another study pinpoints a different area of problem in this discussion and that is the time lag between the renewal and update of the instruments as regards ecolabels, as well as in some cases also have a narrow focus on the use stage (as in the case of the product group studied, washing machines).¹⁰⁹

3.2.2 *Current approach in criteria development*

A few years ago, the criteria development processes for ecolabelling and GPP were undergoing a revision and by now the first part of the development process for GPP and ecolabelling are merged into one, see Figure 1. The current extent of the joint work is from the initial work plan up until the technical reports, as illustrated in Figure 2 below. The EU GPP criteria documents are based on available scientific information and data, (including that from ecolabelling), a life cycle approach and stakeholder engagement. The documents are based on technical reports that describe the key environmental impacts during production, use phase and end of life of products, existing technologies, related legislation, market availability and cost considerations.

The criteria development process is led by the Commission's Joint Research Centre's Institute for Prospective Technological Studies (JRC-

107 Dalhammar, C., Machacek, E., and Remmen, A. (Forthcoming). Addressing resource efficiency through the Ecodesign Directive: A review of opportunities and barriers. Nordic Council of Ministers.

108 Remmen, A., Andersen, R. D., and Dalhammar, C. (2011). Expanding the Scope of the EuP Directive. TemaNord 2011:558. Copenhagen.

109 Bundgaard, A-M., Overgaard Zacho, K., and Remmen, A., (2013) Product policies on the environmental performance of washing machines. TemaNord 2013:549. Copenhagen.

IPTS) on the basis of an annual Ecolabel/GPP work plan.¹¹⁰ This work plan is adopted in consultation with the GPP Advisory Group which is a consultative body which is composed of one representative per Member State as well as four representatives of other stakeholders (i.e., civil society, industry, SMEs, public procurement and local authorities).

It is worth noting that it has been pointed out that the current scope is not set in stone as it has been stated that the possible extent of the integration of the criteria development processes of EU ecolabelling and EU GPP will become clearer in time.¹¹¹

Figure 1. Standard procedure for development and revision of EU GPP criteria (source: European Commission¹¹²)

As illustrated in Figure 2, the EU GPP process to a large extent follows the structure of the EU Ecolabel criteria-setting procedure. It provides stakeholders with the possibility to comment on the documents and on the draft EU GPP criteria at several stages of the process. However, compared with the EU Ecolabel procedure, it is shorter and does not involve

110 European Commission. DG Env. Newsletter. Sustainable Consumption and Production and Sustainable Industrial Policy Action Plan. February 2011. Issue No. 2. Available Online: <http://ec.europa.eu/environment/eussd/pdf/newsletter2.pdf> [2013-12-02].

111 European Commission. DG Env. Newsletter. Sustainable Consumption and Production and Sustainable Industrial Policy Action Plan. February 2011. Issue No. 2. Available online <http://ec.europa.eu/environment/eussd/pdf/newsletter2.pdf> [2011-10-27]

112 European Commission. Environment. Process for Setting Criteria. Available Online : http://ec.europa.eu/environment/gpp/gpp_criteria_process.htm [2013-12-02].

the formal adoption of the criteria as a legal act.¹¹³ It should also be noted that a shortened procedure is possible for non-substantial revision of criteria, for either GPP or ecolabel criteria development, depending on the product group.¹¹⁴

The EU GPP criteria development process can be led by the European Commission, by the Member States or by stakeholders. The first occurrence ever of a development process to be led by a group of stakeholders was initiated in 2012 for the revision of criteria for lamps. The consortium includes manufacturers and NGOs¹¹⁵. The documents produced for development and revision of EU GPP criteria include: preliminary report, technical report, EU GPP criteria, and a final report.

As illustrated in the Figure 2, the document in the first step resulting in the Preliminary Report is done for both for EU Ecolabel and EU GPP. The Preliminary Report provides the following types of information:¹¹⁶

- Quantitative indication of the potential environmental benefits related to the product group.
- Reasoning for the choice and scope of the product group
- Analysis of other environmental labelling criteria
- Current laws and ongoing legislative initiatives related to the product group sector
- Analysis of the possibilities of substitution of hazardous substances by safer substances
- Intra-community market data for the sector, including volumes and turnover
- Estimation of the public procurement market
- Preliminary public procurement expenditure, evaluation of the costs to public procurers and demonstration of ways for calculating the costs on a life cycle cost basis
- Extent and overall relevance of the environmental impacts associated with the product group, based on new or existing life cycle assessment studies
- References of data and information collected and used for issuing the report

113 European Commission Website 2013. Process for setting criteria. Available online: http://ec.europa.eu/environment/gpp/gpp_criteria_process.htm [2012-11-03]

114 European Commission Website. Procedure for the development and revision of GPP criteria. Available online: http://ec.europa.eu/environment/gpp/gpp_criteria_procedure.htm [2013-11-05].

115 ENDS Europe (2012): Stakeholder group to revise ecolabel rules. Ends Daily Tuesday 17 January 2012. Available Online: <http://www.ends europe.com/27960/stakeholder-group-to-revise-ecolabel-rules> [2013-12-02].

116 European Commission Website. Procedure for the development and revision of GPP criteria. Available online: http://ec.europa.eu/environment/gpp/gpp_criteria_procedure.htm [2013-11-11].

4. Key points of difference: Ecolabelling vs. GPP

In view of the stated indications of the potential usefulness of ecolabelling in GPP, this section explores the criteria documents and their underlying information. It focuses on the differences in coverage of product groups between the two systems GPP and ecolabelling, as well as the differences between their criteria development processes.

4.1 Product group selection

The range of product groups and selection process of new ones varies somewhat between the two systems. In GPP, the product groups that are targeted can be chosen based on different priorities and organisational goals, environmental impacts (either life cycle or specific aspects) as well as pragmatic selections based on expenditure of purchased quantities. Even if the national GPP mechanisms in the Nordic countries at large base their product group selection on similar thinking in terms of approaches and principles but differ in terms of systematic methods. For instance, the approach of the Swedish MSR to select product groups builds on a combination of the volume of consumed products and services and their relevance in fulfilling the national environmental goals.

The combination of services and products within a product group differs between the Nordic countries. In Sweden, for example, the product group of transport concerns both the procurement of individual tyres, cars, and buses, as well as, the procurement of transport services.

The development of the Nordic Swan ecolabelling scheme considers products' impact on the environment throughout their life cycle. In order to select the product groups that are most suitable for ecolabelling, the Nordic Swan scheme investigates their environmental relevance, potential for improvements and to what extent a market-based instrument can influence a change by using the RPS-model (Relevance, Potential, and the possibility to Steer/influence).

4.2 The criteria development processes

The criteria from the Nordic Swan include environmental, quality and health arguments and the stringency of the criteria is intended to promote products and services belonging to the most environmentally sound ones and take into account factors such as free trade and proportionality. For the Nordic Swan, criteria are developed by a group of experts, including consultations with representatives of stakeholders. Each proposal goes out for a public review. After this, the criteria documents are processed by the ecolabelling bodies appointed by the relevant authorities in the Nordic countries. The criteria are finalised by the Nordic Ecolabelling Board and approval of the criteria requires a majority decision in the Nordic Ecolabelling Board. The process lasts typically a year or more. The criteria are in general reviewed after 3-5 years.

The criteria development processes vary for the national GPP criteria in the Nordic countries. The Norwegian GPP criteria are developed in collaboration with relevant interest groups and experts. The recommended criteria should, whenever possible, as far as possible, support the official ecolabelling schemes, the Swan and the EU Ecolabel.

The GPP criteria in Sweden are developed by MSR with expert groups consisting of representatives from industry associations, businesses, NGOs, state, counties and municipalities. The criteria are overseen continuously and considered in technical and legal developments on the market. The criteria development work is structured as follows:¹¹⁷

1. A pilot study to identify the most important known environmental and other sustainability aspects.
2. Criteria are developed using this study, together with the group of experts and with input from, where appropriate, criteria from ecolabels such as the Swan, Good Environmental Choice and TCO.
3. The criteria are then adjusted with the help of other documents to work in the best way in public procurement, that is, to facilitate for both purchasers to follow up requirements as well as for suppliers to prove they meet the requirements.

The Swedish system is designed so that the users can single out selected requirements or use (apply) whole sets of requirements. Also, users can choose the level of requirements according to their preconditions for the procurement in question, such as available market information or ambition levels.

¹¹⁷ Miljöstylningsrådet. Om våra kriterier. Available Online : <http://www.msr.se/sv/Upphandling/Kriterier/Om-vara-kriterier/> [2013-12-02].

The duration of the criteria development process also differs. In the case of the GPP criteria development process (as illustrated by the Swedish MSR criteria) the process normally takes between 6-12 months depending on the product area's complexity¹¹⁸.

4.3 Criteria documents: form and function

The function and format of criteria requirements differ between ecolabelling and GPP and this can be a point of concern. The criteria of the Swan are aimed for specialists in the manufacturing enterprises and verifying specialists of the ecolabelling scheme to be used when the producer apply for the license to use the ecolabel. In contrast, GPP requirements are meant to be used by purchasing officers and their suppliers in several tendering processes.

The format of the environmental criteria for GPP differs among the Nordic countries. To illustrate, Danish sets of GPP criteria suggest what is most important by presenting the requirements in a prioritised sequence.¹¹⁹ In their GPP criteria, Denmark breaks down the information provided in their GPP tools to a more detailed level than other countries, i.e. at the product level rather than at the product group. One suggested explanation was that providing information at a more detailed level may be a more natural arrangement of information for the procurers.¹²⁰

In Norway, complete sets of criteria have been prepared, with a request to cross out those the purchasing officer does not want to use. Norway uses "should" requirements, point questions and suggestions regarding which replies should form the basis of calculation of the product's life cycle costs.¹²¹

In Finland, the GPP guidance tool contains yes/no questions in order to define the most economically advantageous tender. Every yes answer awards one point. Purchasers can change the weighting if they want and/or if they only use some of the questions and not all of them.¹²²

118 Ryding, S.-O. (2010). Hållbar offentlig upphandling och annan professionell upphandling: Resultat från regeringens handlingsplan för miljöanpassad offentlig upphandling. Miljöstyrningsrådet. MSR Rapport 2010:3.

119 The Environment and Public Procurement - Common Nordic Procurement Criteria? TemaNord 2006:599

120 AEA (2010). Assessment and Comparison of National Green and Sustainable Public Procurement Criteria and Underlying Schemes

121 The Environment and Public Procurement - Common Nordic Procurement Criteria? TemaNord 2006:599

122 The Environment and Public Procurement - Common Nordic Procurement Criteria? TemaNord 2006:599

The range of environmental demands and also the environmental stringency tend to differ between ecolabelling and GPP. Whereas the criteria in the Nordic Swan are life cycle based (i.e. they should focus on the main environmental aspects along the life cycle of the product or service), environmental aspects considered in GPP can be selected for other organisation- or region-specific reasons, as well as, due to constraints related to the legal framework for public procurement.

Currently, the scope of requirements in ecolabelling shows signs of being widened as some of the schemes have started to introduce requirements on social issues.¹²³ Currently, also the Nordic GPP systems address social issues typically for some selected foodstuffs and textiles, as exemplified by the MSR GPP criteria (see below). A tool to assist socially responsible procurement, the CSR compass, is shared between the Nordic countries.

The relevance, potentials and limitations of ecolabelling in the key points earlier identified are here further explored. A comparison of GPP mechanism and ecolabelling criteria for three product groups, cleaning products, hotel services and paper products, on the Nordic markets is carried out. The information compared is given in tables presented in Appendix 4. The analysis is structured according to the points in the GPP practices for which ecolabelling has been found to have most relevance.

The product groups, their number and definitions, may be an area of scrutiny. To illustrate from the GPP systems alone, according to a European study, there may be a number of different products captured within different product groups in the various GPP schemes in Europe.¹²⁴ The same study also pointed out that procurement of goods and services may require different considerations and different guidance. Hence combining several products or both goods and services within a single product group and within a single document may not be the most helpful and expedient way of providing information to the procuring professional.

It should however be mentioned that in the product groups reviewed for the study presented in this report (see Appendix 4), the product group definitions are at large comparable between the different national GPP systems as well as in ecolabelling for each product group. Overall, the differences found are not considered to constitute a hurdle or significant difference.

¹²³ AEA (2010). Assessment and Comparison of National Green and Sustainable Public Procurement Criteria and Underlying Schemes.

¹²⁴ AEA (2010). Assessment and Comparison of National Green and Sustainable Public Procurement Criteria and Underlying Schemes.

The coverage of environmental aspects and criteria is another important point. From the policy point of view, as mentioned in the previous chapter, ecolabelling can potentially more easily include considerations to product and process methods (PPMs). The ecolabelling criteria typically include a larger number of requirements and thus open up for being more detailed and open up for additional environmental aspects, even if the core aspects appear to be overlapping. This could be seen as a consequence of the ambition of ecolabelling to identify the top-performing products in the product group while green procurement does not necessarily have the same level of ambition since procurement officers need to assure a sufficient number of competing products and bids. In practice, GPP could choose any level of environmental performance higher than the bulk of the product group in order to be relevant. Hence, some of the GPP systems offer criteria at differentiated levels through adding requirements (stricter and/or additional aspects) to the previous levels.

A comment from the workshop pointed out that it is reasonable that ecolabelling criteria could be structured so that they can reflect different levels of environmental performances useful as GPP requirements in graded scales, for instance basic, mid and advanced requirements. There may, however, be pedagogic hurdles to exclude “less important” requirements from the ecolabelling criteria.

Both ecolabelling and GPP criteria seem to take similar stances when it comes to include environmental significant stages of the products’ life cycles. However, it does not exclude that there is a need to clarify the situation if ecolabelling requirements should be reduced to core criteria for differentiated and more advanced levels of ambition.

The way that criteria are formulated is another important point. Compared to GPP criteria, the Swan seems to be more frequently using point score systems beside absolute threshold requirements in its criteria. Instead, GPP, as exemplified with the GPP criteria from MSR in Sweden, makes use of spearhead levels of the criteria for the purpose to allow for the procuring organisations to choose more stringent demands (See Chapter 2).

In some cases, the GPP criteria use the ecolabelling criteria as model for requirements and sometimes use them straight away. However, the Swedish GPP criteria more frequently refer to criteria models used by the EU Ecolabel criteria. In addition, raw material requirements, such as sustainable forestry and organic food, are often related to their dedicated labelling schemes.

Finally, a point of comparison is the use of verification for fulfilling the criteria. In the GPP criteria, the producers can be asked to demonstrate

compliance for each contract and the procurement officers should safeguard the correctness of the compliance of the requirements. Thus, requirements should be easy to understand and their verifications easy to conduct in a resource-efficient way. The different GPP criteria also suggest means for verification including documents, producer declarations and potential ecolabels.

The Swan criteria offer limited guidance that could be useful to procuring organisations on how to verify if a supplier or product fulfils the criteria when not verified with an ecolabel. For the internal process of the ecolabelling verifiers this may not be a significant problem, but it would, since some GPP criteria state compliance with ecolabelling criteria, be helpful to indicate what is needed for the verification. On the other hand, such guidelines may open up for different interpretations of what constitutes compliance or not.

4.4 The green procurement process and the role that ecolabelling can play

GPP can be described as a process that begins with the contracting entity making an analysis to identify the needs and to create an understanding of how to specify the description of the object of the contract.

There is a certain freedom to set sustainability criteria in public procurement, the basic rule, according to EU Procurement Directives, as mentioned in Chapter 2, is that as long as the requirements are proportionate to what is procured, it is possible to make demands. The relevance of requirements depends on where in the procurement process the requirements are. Current GPP guidance (such from MSR or from the European Commission) can be applicable along most of the steps in the procurement process. Other information can also be used, including ecolabelling, which can provide a useful basis of information in other steps of the procurement process, as illustrated in Figure 2.

Figure 2. The process and inflow of information for greening of public procurement.¹²⁵ (Explanations: Technical specifications: requirements the purchased product or service should be fulfil, Qualification requirements: requirements on abilities and capacities of the supplier that should be met, Evaluation requirements: used for comparing and awarding lowest price offers, Specific contract requirements: requirements on supplier, product or service that should be fulfilled under the execution of the contract.)

According to a study for the European Commission on GPP in the EEA Member States, environmental requirements are most commonly used for technical specifications (66%), thereafter by award criteria (45%) and requirements for technical and/or professional ability (44%).¹²⁶

Procurers in public organisations normally have limited resources for verification and follow-up procedures.¹²⁷ There are different ways that they can verify that the products procured meet set requirements,¹²⁸ including suppliers' self-verification, suppliers' self-verification with random audits, independent third-party certification, and independent third-party certification with on-site audits. These approaches are to be compared with the verification offered by the ecolabelling certification schemes. For the Nordic Swan it is facilitated by ecolabelling program employees (other ecolabelling schemes can outsource verification to

125 Grön offentlig upphandling – hållbara inköp" av Charlotta Frenander and Kristian Pedersen (MSR och Delphi). Available online: http://old.msr.se/PageFiles/106/pres_080313_C_Frenander_%20K_Pedersen.pdf [2013-11-28]

126 Adelphi Strategic Use of Public Procurement in Europe. Final Report to the European Commission. MARKT/2010/02/C. Available Online: http://ec.europa.eu/internal_market/publicprocurement/docs/modernising_rules/strategic-use-public-procurement-europe_en.pdf [2013-11-28].

127 Bratt, C. (2011): Assessment of Ecolabelling and Green Procurement from a Strategic Sustainability Perspective. Blekinge Institute of Technology. Licentiate Dissertation: Paper A

127 CASE, S. (2009): The Future of Green Labels. Available Online: <http://govpro.com/green/content/green-label-value-200910-11/> [2013-12-02].

128 CASE, S. (2009): The Future of Green Labels. Available online: <http://govpro.com/green/content/green-label-value-200910-11/> [2011-12-06]

another competent certification bodies with higher local presence), and who can be expected to have a high competence for this task.¹²⁹

A great number of reports and articles point to ecolabels as an important tool for the practitioners in their GPP practices. A number of studies suggest where in the GPP practices, i.e. in the purchasing process, ecolabelling can play a role and how^{130, 131, 132, 133, 134}.

In the initial part of the procurement process, the market analysis, ecolabelling has been said to help provide a market overview of products with improved environmental properties.

In setting the technical specifications, it has been claimed that the procurement organisations can use available ecolabelling information as a reference point, use individual requirements as technical specification or a *de facto* standard for a given product group. In this way, ecolabelling can assist by giving assurance that environmental requirements are viable. In state organisations bidders cannot be requested to carry a license from an ecolabelling scheme, however they can be suggested to use ecolabelling "or equivalent" as means of verification.

Available studies can also report the usefulness of ecolabelling in formulating qualification, award requirements and contract conditions^{135,136,137,138,139}. For this area of use, ecolabelling can indicate

129 Bratt, C. (2011): Assessment of Ecolabelling and Green Procurement from a Strategic Sustainability Perspective. Blekinge Institute of Technology. Licentiate Dissertation: Paper A

129 CASE, S. (2009): The Future of Green Labels. Available Online:

<http://govpro.com/green/content/green-label-value-200910-11/> [2013-12-02].

130 Naturvårdsverket (1995). Offentlig upphandling med miljöhänsyn. Stockholm.

131 Rabbiosi, L. (2010): Powerpoint presentation: Environmental and sustainability labelling. UNEP. Capacity building seminar: Local strategies for greening jobs and skills . 9-11 June 2010, Trento, Italy Available Online: <http://www.oecd.org/dataoecd/47/15/45484690.pdf> [2013-12-02].

132 Aalto, K., E. Heiskanen, C. Leire, and Å. Thidell (2008): The Nordic Swan: From past experiences to future. TemaNord 2008:529. The third evaluation of the Nordic ecolabelling scheme. The Nordic Council of Ministers: Copenhagen

133 Frenander, A., & Råsmar, S. (2012). Miljöhänsyn och social hänsyn i offentlig upphandling. Stockholm: Konkurrensverket

134 Heidenmark, P., Jönsson, K., Lindhqvist, T. & Thidell, Å. (2001): Evaluation of the environmental effects of the Swan ecolabel – final analysis. TemaNord 2001:516. The Nordic Council of Ministers: Copenhagen

135 Ochoa, A. & C. Erdmenger (2003): Study Contract to survey the state of play of green public procurement in the European Union. ICLEI

136 Heidenmark, P., Jönsson, K., Lindhqvist, T. & Thidell, Å. (2001): Evaluation of the environmental effects of the Swan ecolabel – final analysis. TemaNord 2001:516. The Nordic Council of Ministers: Copenhagen

137 Miljöstyvningsrådet. MSR2008:E8. Stockholm. Naturvårdsverket (1995) Offentlig upphandling med miljöhänsyn. Naturvårdsverket: Stockholm.

138 Rabbiosi, L. (2010): Powerpoint presentation: Environmental and sustainability labelling. UNEP. Capacity building seminar: Local strategies for greening jobs and skills . 9-11 June 2010, Trento, Italy Available Online: <http://www.oecd.org/dataoecd/47/15/45484690.pdf> [2013-12-02].

139 des Abbayes, C. (2006): The use of the European Ecolabel criteria in Green Public Procurement approaches. BIO Intelligence Service SAS. EU Ecolabel Helpdesk. EU Ecolabel Marketing Management Group Meeting. Presentation given on 19 September 2006 in Brussels.

the quality of required information needed, the content of the contract, as well as to give guidance on whether products exist on the market that meet the selected requirements and to help to evaluate the size of the market. For contract conditions, a progressive approach can be used, such as the first year the producer is not obliged to comply with any environmental requirements, the second year to comply with some ecolabelling criteria, and the third year all ecolabelling criteria.

A final point of usefulness not pointed out in Figure 2 has been suggested to be in the control and follow-up, for which ecolabelling can serve as means of verification.¹⁴⁰

Commonly, ecolabels has been said to represent a more-or-less widely shared view of environmental priorities in different product groups, and its well-established criteria are rarely questioned among the product chain actors. Also, by using ecolabelling information, procurement officers can evaluate the potential added costs of GPP and not least save on costs by reduced workload. Moreover, in developing GPP tools and criteria, it has been said that ecolabelling information can be helpful in that it can lower the obstacles because networks and institutional procedures are to some extent already in place. It can also help to select requirements that are in-line with the ongoing work of the supplier and thereby avoid conflicts and potential information overload. The benefits that ecolabels can provide also include helping to indicate the product availability on the market in terms of e.g. environmentally friendly alternatives in the market analysis.

It should be mentioned that references to ecolabelling schemes and information about ecolabelling is presented in the web portals of the national GPP mechanisms aimed for the purchasers.

To sum up, according to the reviewed literature outcomes, ecolabelling seems to be most relevant in the following six key areas in the GPP practices:

- Product group definitions
- Environmental requirement
- Scope of environmental aspects
- Criteria formulation
- Reference to ecolabelling criteria
- Verification

140 European Commission 2008. Green Public Procurement. (GPP) Training Toolkit - Module 1: Managing GPP Implementation. Available online: http://ec.europa.eu/environment/gpp/pdf/toolkit/module1_managing_gpp_implementation.pdf [2013-11-28]

The information provided by the reviewed literature as described above is somewhat limited. The six key areas listed above are used to structure the input from stakeholders as proved in the next section, as well as for the later analysis and comparison of ecolabelling and GPP criteria and processes, with the aim to further explore the possibilities and limitations.

5. Stakeholder views on the key points

So far in this report, the role that ecolabelling can play in GPP have been identified. In this section, the input and reflections from a number of key stakeholders have been summarised. This input was retrieved in a workshop designed for the study presented in this report.

The first of the two overarching topics of the workshop was the key points of relevance of ecolabelling in GPP practices, as identified in literature (see section “4.4 The green procurement process and the role that ecolabelling can play”). In the following section, the second topic of the workshop is presented, namely the possibilities and limitations for a higher degree of integration between GPP and ecolabelling as regards the Nordic governments’ work with promoting GPP.

5.1 Ecolabelling in the green procurement practices

Despite the obvious communalities, both the workshop outcome and the pre-study showed that most stakeholders are of the opinion that for the procurement practitioners, there are potential limitations with a more substantial use of ecolabelling or ecolabelling information in green procurement practices, and that an understanding of these limitations is necessary to find suitable ways forward. Here, the opinions and explanations from the stakeholders present in the workshop are summarised according to the key aspect identified in earlier sections of this study.

5.1.1 *Product group definitions*

The discussions revealed the opinion that differences in product group definitions can be a challenge, especially for finding criteria that are compatible with both GPP and ecolabelling. In green procurement practices, product groups are many times large and diverse, and framework agreements are used, whereas in ecolabelling product groups tend to be more limited and make use of subgroups.

- One suggestion was to take a practical perspective and considering “core products among them commonly purchased by the public sector that are generally most relevant from an environmental perspective”.

5.1.2 Environmental requirements

Stakeholders agreed that the function and format of the criteria are an issue. It was said that it is crucial for procurement officers to avoid posing environmental requirements that are not fully understood by the purchasing organisation. A risk that was mentioned is that environmental requirements that are applied are too general or too detailed or demanding, and as a result the producer sends all information available, which instead can result in too much information for the procurer to handle. The case when posted requirements are not verified was mentioned as an important issue since the trustworthiness of putting GPP requirements could be lost.

The stakeholders agreed that one confusing issue of using ecolabelling criteria in GPP could be the multitude of different requirements to be met. A proposed way out may be to prioritise the most relevant ones for green procurement and thus make the set of requirements more user friendly for the intended user groups: procurement officers and their suppliers. Moreover, requirements on quality aspects and competence of the supplier that may occur in ecolabelling criteria could be a problem to include in GPP. On the other hand, the life cycle costing focus is likely to become more important in GPP but might be difficult to include in ecolabelling.

Suggested possibilities mentioned in the workshop include:

- Single out the most important core criteria as requirements that shall be met.
- Moving some criteria from “shall” requirements to “should”-requirements.
- Making separate lists of the requirements of lower priority/relevance/significance as tip for other requirements.

An approach that was predominant in the workshop discussions was to extract core criteria from ecolabelling. The core criteria would be a basic set of prioritised requirements with high effect and that are easy to verify. The questions regarding the establishment of core criteria in ecolabelling are, however, significant, i.e. how much should the possibility to verify vs. the environmental relevance/significance (or other relevance) steer the choice of these core criteria, how could it work technically to create basic requirements from point scores, and how to identify core criteria that work in “the procurers’ reality”? It was reported in the workshop that this kind of development has been initiated.

Workshop participants concluded that the Swan could consider offering basic, medium and stringent requirements for GPP. The requirements

could be accompanied by instructions for different procurer officers with different level of competence.

The level of environmental ambition for the GPP requirements must be set in relation to the current market situation and also with consideration to the typical procurement situation that the product regards. National preconditions must be considered, for example on the Icelandic market there is a higher degree of ecolabels other than the Nordic Swan.

5.1.3 Scope of environmental aspects

The workshop discussion revealed the view that the overall challenge for the procurement officers is to identify the most environmentally relevant requirements for a given product group, and to match those with the organisational policy, and the possibilities to verify fulfilment of requirements. However, it was said that “it is not only a matter of prioritizing requirements according to how easily they are verified. The real key is to find the trade-off between the most environmentally relevant requirements and those requirements that can be handled and verified”.

5.1.4 Criteria format

The format of the ecolabelling environmental criteria was emphasised as a potential issue since they are difficult to interpret and verify for non-experts. Moreover, it was also said that score points that allow for different paths to fulfil the criteria, often used in ecolabelling criteria, can be beneficial for producers and also can work to stimulate innovation. Here it was pointed out that the risk without point scores is that some technologies could be omitted. This can be especially relevant for paper, cleaning services and laundry services (e.g. energy vs. water consumption). It is questionable whether score points from the Swan criteria can be used in GPP or whether it is difficult to evaluate the economically most advantageous offer using score points. It was, however, mentioned that score points could be used for awarding a contract.

Crucial points as regards the format of the criteria include:

- Yes/no requirements are suitable in GPP criteria
- Absolute requirements are easy to use and may become more necessary in times of focusing on lowest price
- For the sake of user friendliness would requirements on what substances to avoid be better than score points for combinations of restricted substances
- Weighting factors was deemed to work for GPP criteria
- Most likely, point score systems might require more knowledge of the person who is assigned to evaluate the points.

5.1.5 Verification

As discussed in the earlier chapter, GPP could request that a product or service should meet requirements stated in specified ecolabelling criteria documents and that a corresponding ecolabel can be used as verification of compliance in procurement process. However, in the workshop, several voices pointed to that this type of use of requirements from ecolabelling can create difficulties for the procurement organisation:

- The purchasing organisation cannot request an ecolabel. Such use of requirements from ecolabelling should also allow the producers/supplier the possibility to provide other kinds of proof of compliance, such as self-declarations. That would shift the burden of proof from the third-party control and instead imposes the task on the procurement organisation to verify the information. Examples include absence of toxic substances or industrial chemical products.
- Another issue mentioned as a hurdle is when allocation of e.g. water, energy, i.e. what specific consumption is related to the purchased product or service is required. In the case the total yearly consumption is the only available figure, and then the question is what should be allocated or calculated per product produced in a wider range.¹⁴¹
- It was also agreed that requirements referring to other environmental requirements addressing second and third tier suppliers make verification more difficult, exemplified by chemical requirements or other labels and certification schemes. Besides the issues of shifted burden for verification, it was said that it would be too resource consuming.
- Moreover, the producers' hesitation to reveal confidential information can make obtaining information on chemical formulas or disclosure of contents difficult. The third-party verification system of the Swan scheme is used to find paths around this issue but may be more complicated for individual public purchasing organisations.

The stakeholders in the workshop also mentioned some aspects that can facilitate the verification of ecolabelling information if used in green procurement practices:

- The backup of legislation or policy, such as in the case of energy efficiency for which there is mandatory legislation, energy classes and energy labelling.

¹⁴¹ This issue was subject to different interpretations among the Nordic countries

- Readily available information, for example consumption-related data, can be relatively easy to verify, especially if the producers have non-confidentiality data, and if they have it at hand and do not need to ask upstream for additional information.

In the workshop discussions, a number of suggestions on how to increase the areas of use of the Swan in the GPP practices were summarized. These include:

- Ranking and selecting environmental requirements in terms of the possibility to verify and focus on fewer core requirements that are easier to verify
- Communication on the environmental relevance for the procurement
- Providing a place, for instance a web site, wherefrom procurers can take environmental requirements to paste directly into the technical specifications
- Adding information on how requirements link to different environmental targets
- Requirements in the key product categories differentiated in terms of basic, medium and advanced requirements
- Separating environmental requirements according to their relevance for supplier vs. products performance

5.2 Operative issues regarding the ecolabelling and GPP mechanisms

In this section the workshop discussions on an increased integration between ecolabelling and GPP on a system level are presented. Here it was clear that there is an agreement that the objective to attain a higher degree of “synchronisation” between the Swan and GPP in the Nordic countries is a relevant mission. The main argument was that the criteria development requires substantial work and also that there is risk that some work is redundant as it takes place in both systems separately.

5.2.1 *Potential scope of integration*

The workshop discussions identified a number of possible areas of cooperation between the Swan and GPP mechanisms in the Nordic countries. These concern criteria development, development of procurement guidance and information on environmental impacts. In the project workshop, the consulted stakeholders have presented a number of actions to initiate and move forward towards cooperation:

- Making a working model with the input from national procurement actors

- Input from lawyers for a common and/or reinforced view in relation to public procurement requirement
- Recommendations for both criteria and guidance
- Providing assistance to participants such as help-desk, training, education and developing a purchasing guidance
- Placing GPP criteria development on a Nordic or European level, but for national adjustments and implementation

It was also suggested that a useful model to identify product groups with relevance for ecolabelling and GPP could be to combine RPS (Relevance, Potential, and the possibility to Steer/influence) of the Swan with areas with many licenses or new areas with large public purchasing volume.

The stakeholders' opinions on how to relate to the ongoing work on the EU level vary. It was for example mentioned that one way can be to turn to EU to identify suitable product groups that are relevant for GPP. Another way would mean to start with product groups for which EU does not already provide GPP requirements.

5.2.2 *The role of current actors*

As regards the actors' potential role in this work, a number of suggestions were given:

- The Swan and GPP facilitation organisations in the Nordic countries could have a common forum or platform for cooperation, both regarding the choice of product groups and the details in the requirements as well as their updates.
- The ecolabelling organisation could develop new procurement guidance in collaboration with GPP organisations that would run and update them.
- Public procurers could influence the outcome of the RPS (see above) analysis of product groups to target.
- The available regional and international networks should be better utilised in order to obtain and share new knowledge.
- The role of motivating public actors involved in procurement should not be underestimated.

A situation of competition between the two systems for ecolabelling and for GPP should be avoided. However, unless both systems are involved with or have experience with the product group in question, it can be difficult to give feedback/input to the other system's development. To comment and have information exchange between the Swan and GPP requires that the two systems work on similar issues, preferably in a common pace and keep each other informed about upcoming task areas.

5.2.3 Hurdles and needs

The lack of national harmonisation of requirements, interpretations, practices, etc. can be a hurdle when using Nordic ecolabelling requirements in GPP. Differences can be found in the practical application of environmental requirements and the practices of using ecolabelling license or other standards as proof of criteria fulfilment. Furthermore, the interpretations of what is permitted and required in public procurement differ among the Nordic countries.

Despite the variances in GPP among the Nordic countries, there are things seen as equal in all Nordic countries regarded the procurement officers: the issues with the weak or lacking skills and capacity for GPP practices in smaller purchasing organisations. It is necessary to improve their competence because environmental requirements will inevitably result in higher complexity of the procurement process. This, in turn, calls for a closer look at the resources for the procuring organisations to grow with this task. The need to spread the knowledge and build up capacity within each country and between the countries in order to save resources is greatly acknowledged.

It was also said that new instructions or mandates and also financial support may be required for an expansion of ecolabelling to facilitate for green procurement. The Swan is built on a self-financing business model that implies use of ecolabelling criteria and issued ecolabelling licences. Taking on new tasks would need more resources which could be covered in case GPP would stimulate that more licenses are issued. In this way more resources for GPP criteria development could be generated, which in turn could facilitate additional revisions or additions of criteria.

The main concern raised was that the current national GPP organisations, tools as well as the GPP practices differ between the Nordic countries. It was pointed out that to organise such a task, the processes between GPP and ecolabelling criteria need to be synchronised so that the criteria revision and updating harmonise and correspond.

6. Summary of findings

This study has focused on how GPP and ecolabelling relate to one another and the common areas of use that are of relevance for the discussion on how to further integrate or increase the cooperation between them. To a smaller extent, the study has given attention to how increased cooperation could work in the Nordic and EU settings. Moreover, it should be noted that the purpose of the study has not been to find consensus among the actors involved, but rather to collect ideas and views that are valuable in scoping the possibilities and limitations for further work.

Historically, ecolabelling has played an important role for the development and implementation of GPP practices. Overall, in the EU and in the Nordic countries, there is an increasingly explicit ambition to facilitate contributions from ecolabelling to GPP, where ecolabelling provides the expertise and standard setting in the product categories and also provides for the dynamics of increasing the environmental performance of the products in a given product group.

6.1 Possibilities and limitations

The potential contributions from ecolabelling to GPP have in this study been explored on two levels:

- the national GPP organisation, primarily in development of requirements, and
- the green procurement process i.e. by the users of the information (the procurers and the producers/suppliers).

It has been found that in these two settings ecolabelling has served, and continues to serve, GPP in a number of ways.

We realise that practitioners in the ecolabelling and GPP systems have a knowledge about each other's systems, how they work and to a large extent environmental scope and requirements though basically without formal alignments. Current indications both from the criteria examination and the workshop outcomes point at a situation where benefits from synergies are, at least partly, utilised.

Development of environmental requirements

The overlaps of environmental scopes indicate synergies between the Swan and GPP. These synergies consist of previously mentioned issues

such as building up knowledge, shaping the scope of the criteria and phrasing final requirements.

The examination of the different criteria sets reinforces the thought, as confirmed in the workshop, that it most likely is possible to reduce the number of ecolabelling criteria to fewer core criteria which would be more useful for GPP since both systems indicate similar environmental significant stages of the products' life cycles.

It was mentioned that the amount and format of the information provided by the ecolabelling criteria documents can be problematic for purchasers. Ecolabelling criteria can be extensive pieces of text and written in technical jargon. Considering that procurers in public organizations represent a heterogeneous group in terms of their level of interest and competence in sustainability,¹⁴² it is not generally recommended that the procurement officers use these criteria themselves. GPP criteria, on the other hand, are designed for the professional procurement officer, and as such they cannot be very extensive.¹⁴³

The sometimes mentioned difficulty to use ecolabelling in GPP for the reason that product groups may be defined differently appears to be a smaller issue. The product groups that were reviewed for this study, the product group definitions were not seen as a major obstacle.

The environmental stringency can be another issue. However, by using different levels of ambition in the GPP criteria can be applied in each of the criteria categories described. For instance, the Swedish MSR system employs these levels:

- basic requirements: criteria that are easy to verify and could be met by plenty of the products on the market
- advanced requirements: criteria that set higher demands on environmental performance and also demand more of the procurer when it comes to verification and follow-up, and
- spear-head requirements i.e. the best products that the market has to offer.

The purchasing organisation can choose the level of ambition that is considered appropriate in each purchase situation.

142 Naturvårdsverket. (2010). Miljöanpassad offentlig upphandling - En fråga om att vilja, kunna och förstå. Stockholm.

143 Norden (2006): The Environment and Public Procurement Common Nordic Procurement Criteria? TemaNord 2006:599. The Nordic Council of Ministers: Copenhagen.

Ecolabelling, on the other hand, has one level that aims for a certain fraction of the best performing products and services.

One important difference affecting GPP practices is that whereas ecolabelling is overriding most geographical variances, GPP, so far, is for the most part adjusted to local needs, policies and preconditions. It has therefore been stated that one risk with turning to ecolabelling in GPP can be that it may compromise the ability of GPP to accommodate to the local variations of environmental problems.¹⁴⁴

The different processes and subsequent times needed may hinder the synergy of parallel criteria development and revision processes. It has also been pointed out that the process for GPP criteria development has been suggested to compromise on regularity and the life cycle assessment approach.^{145,146} In order to make better use of a common knowledge base, setting matching environmental requirements, market communication, etc. there would be a need of new organisational structures for coordinating the work on GPP requirements on national level in the Nordic countries with the criteria development processes on Nordic level.

Verification process

Ecolabels is often mentioned as suggested verification of criteria compliance in GPP. Again, there is a need to consider different official ecolabels as equivalent for verification.

Moreover, there are principal differences in the verification processes between ecolabelling and GPP-requirements. The ecolabelling scheme has a significantly more thorough verification process including document review, declarations, on-site inspections and in some cases supplementary laboratory analyses for verifications of the many requirements. This is possible since the responsibility is on the competent body of the ecolabelling scheme and the producer only needs to do the verification once for each criteria cycle.

Thus, we can conclude that there are potential synergies but also barriers for further contribution to GPP from the Swan and the realisation of these potential synergies is primarily a matter of the potential gains in relation to the efforts of overcoming the hurdles.

144 Bleda, M. and Valente, M. (2009). Graded ecolabels: A demand-oriented approach to reduce pollution. *Technological Forecasting & Social Change*. 76: 512-524.

145 Lavallee, S. & Plouffe, S., (2004): The ecolabel and sustainable development. *International Journal of Life Cycle Assessment* 9, 349-354

146 Harris S. M. (2007): Green Tick™: An example of sustainability certification of goods and services. *Management of Environmental Quality: An International Journal*. 2007;18(2):167-78

Initial questions that address potential problems with an increased integration can be:

- Would it be difficult for producers to fulfil two sets of requirements? This issue could be viewed both as potential confusion when two different ‘official’ bodies put requirements on delivered articles and services. Historically has differences in GPP requirements been viewed as problematic by some producers. In this study, we have not found any significant problems related to differences in GPP and ecolabelling criteria but there is a potential risk of conflicting demands. Thus, a minimum requirement would be that the systems prevent such a situation through reviewing each other’s requirements.
- How could the GPP systems avoid unnecessary verification costs for producers selling ecolabelled products? In our study, we have not found any evidence that GPP systems address completely different environmental aspects or put significantly different requirements on the products. It is thus suggested that ecolabelled products (the Swan, the EU Flower) should be sufficient verification of compliance with the GPP criteria for matching product groups.

6.2 Concluding remarks

- We notice that GPP is considered important and has a strong policy support in the Nordic countries and in the European Union.
- In the EU, there is a strive towards more formalised coordination between the EU Ecolabel and the European GPP mechanism.
- In the Nordic countries, the development and dissemination of GPP requirements are spread on several actors often linking their information to both GPP mechanisms in other Nordic countries, other European countries as well as to the EU GPP criteria.
- One of the workshop outcomes was the importance of reaching the purchasing officers accomplishing the procurement with relevant information, support and guidance.

Judging from the numerous of use, it can be concluded that the overlapping functions are sufficiently many and important to justify further attempts to find win-win situations. Synchronisation of information and utilizing public investment spending are two drivers well worth aiming for.

As mentioned above, the possibilities of distinguishing core criteria within the Swan were frequently mentioned. It is, however, also clear that this concept requires some further scrutiny. Indeed, the preconditions are good in the sense that the Swan criteria in general are suffi-

ciently many to allow for a selection of core criteria. However, while the environmental relevance and gains should be safeguarded, any core criteria should be chosen to avoid those that result in too much work or costs for the procurement organisation, or potentially that focus too much on the production process (especially for imported goods).

One opportunity for a more institutionalised cooperation could be to organise the Nordic GPP criteria development as a parallel process just like in the EU. Such an arrangement would bridge knowledge in several aspects: product-related environmental information and potentials for environmental improvements and suitable requirements. Shared views among larger actor groups could also enhance consensus on more strategic and goal-oriented requirements leading to more significant environmental product improvements.

The question is also how much ecolabelling can modify the environmental stringency in the core and advanced criteria, if such are applied. For ecolabelling to function there must be significant differences in environmental performance between the products in the product group, since ecolabelling distinguishes environmentally superior products from the bulk of products in that category. For GPP, on the other hand, could drive green product development and market supply by gradually expanding the requirements to all producers and suppliers, when relevant.

Absolute requirements are typically seen as easier to understand and verify and thus more suitable for GPP. A major argument for point scores mentioned in the workshop was a stronger incentive for innovation and opportunities for different technical solutions. From the criteria examinations, it is not possible to state if all point scores need to be excluded or if some could be used in GPP as award criteria. This is probably a task to be further examined if ecolabelling criteria should be reduced to core criteria. The point scores could be one means for distinguishing between basic and more advanced levels of GPP requirements.

The initiated work for developing and applying GPP criteria is still under development but may influence the situation substantially in the future. It is thus important to follow the development closely and analyse how it will influence both the conditions for GPP practices as well as the needs for national or Nordic GPP criteria development and adaptations.

This path towards greater synergies implies a tighter collaboration of the actors' and stakeholders' of the different systems in the Nordic countries. From the study, we have realised that the actors and organisations behind the different systems know and/or are well aware of each other. It should in the context be realised that these actors and organisations have developed more or less institutionalised procedures and routines

for their work processes. Thus, we should realise that there are some challenges to overcome for further synergies:

- **National practices:** The potential benefits of a common Nordic GPP criteria development process integrated in the one of the ecolabelling scheme could partly be weakened by the needs of adjustments to the national practices. From the workshop it was clear that for instance different national interpretations of environmental impact allocations as well as different extents to which life cycle aspects – in contrast to product-specific aspects – may be included in the GPP requirements. However, from the examination of the GPP and ecolabelling criteria these issues may not appear to be a major problem in practice.
- **Pace of processes:** The criteria development processes for the individual product groups are not synchronised between the Nordic Swan and the different national GPP systems. In addition, the revision intervals may be different for GPP requirements.¹⁴⁷ Thus, there could be administrative challenge in order to adjust suitable processes necessary for making full use of the generated knowledge base for criteria development. The benefit of synchronised processes would be to translate the knowledge into criteria with similar requirements and thereby avoid potentially confusing and conflicting demands.
- **Ecolabels as means for verification:** Procurement officers need to know that the requirements that they use are strict enough to bring an environmental gain. On the other hand, too strict environmental requirements can lead to some drawbacks, including finding products that correspond to the demands at reasonable prices and accomplishing third-party verification. Ultimately, the main goal is to improve the environmental performance of the market. From the discussions with stakeholders it seems that in GPP procurement work there is much to gain on follow-up of environmental criteria since it was mentioned to be a weak link; and, as such, it is a crucial point to strengthen. On the other hand, there is little point with having a demanding verification process if the criteria are not meaningful. It is reasonable that regular mutual updates on progress in criteria development would help finding meaningful stringency standards which all easily could be verified by the ecolabel.
- **Financing:** All organisations work under strict budgets and need to prioritise production before seeking new ways of working. In case of the Swan, it was clearly stated in the workshop that developing GPP criteria (or working outside the given mandate) cannot be justified if it does not pay back as a greater number of licenses or compensation

¹⁴⁷ There is a need for GPP criteria to be constantly up-to-date for the procurement officers. Ecolabelling criteria are revised regularly – mostly every 3-5 years – a relatively long time during which several requirements updating may need to be made.

by other means. This as a consequence of the governing self-funding principle. Another aspect of the ecolabelling scheme as an economic entity could be the efforts in knowledge-building which could be viewed as an intellectual property of a certain value. The benefits, both economic and result-oriented, should clearly be greater than the initial cost of greater collaboration of the systems.

Further collaboration, cooperation or Nordic harmonisation of GPP requirements could be considered for different levels. We concluded that representatives of the different national GPP mechanisms and the ecolabelling have communicated and exchanged information over the years in an on-demand more or less informal way in the Nordic countries. This information exchange has appeared to be fruitful and there could, if desired, be different paths to reinforce it. These paths could be:

Formalised and structured interaction and information exchange:

The current informal information exchange between the Nordic Swan and the national GPP mechanisms could be structured in order to provide information on upcoming product groups, criteria revisions, background knowledge on product group definitions and related environmental aspects, phrasing of specific requirements, etc. This path would allow the different schemes to take part of readily accessible information according to currently common practice. This path would only imply better knowledge on current activities and in case relevant sharing knowledge.

Common criteria development and revision processes: A formalised cooperation between the develop GPP tools on Nordic national levels and the Nordic Swan could imply common and synchronised criteria development processes for relevant product groups fostering an interaction for an increased coordination of the national requirements in the Nordic countries but leaving the setting of final requirements to the national GPP organisations which also would take care of explaining and helping procurement officers on how to use them. Moreover, the national GPP mechanisms cover and develop criteria for product groups outside the scope of the ecolabel, which implies a need for separate processes – either a common Nordic or national – for these additional product groups, which however could benefit from coordinated information exchange.

Using ecolabelling information and criteria for GPP requirements:

This path would aim for harmonisation of GPP criteria development processes based on core criteria from the ecolabelling scheme in a process similar to the European. This kind of process would ultimately coordinate the efforts of the national GPP mechanisms in order to

facilitate similar requirements in all Nordic countries. In parallel to the previous approach, there would be common processes for product groups outside the scope of ecolabelling.

An independent Nordic GPP mechanism developed by the ecolabelling scheme: The Nordic ecolabel could develop a GPP mechanism for the Nordic market decoupled from the national GPP initiatives. This mechanism could be based on core criteria from the fully developed ecolabelling criteria. The approach is not new and would be a continuation of the works already conducted by the Nordic scheme. In case it is considered necessary, the national branches of the Nordic Swan could assist procurement officers in how to use the GPP tool. The current clubs for professional purchasers could serve as basis for such assistance.

Regardless level of increased integration between the systems would the information and support to the purchasers be an important issue that may need national presence and channelled through well-known and established patterns.

6.3 Recommendations for further research

The intention with the study was to identify the main issues and to catch the views of stakeholders and experts, as well as to test the issues on the criteria documents of a few selected product groups. During the course of the study, we became aware of some knowledge gaps that are critical for deriving a more complete picture of the current situation and which directions and concrete set-ups that can be regarded as feasible in the Nordic context.

The public procurement comprises of more and different product groups than those covered by the Swan. Hence, the ecolabel, with its current scope, could only assist GPP in criteria setting for a part of the work. One such knowledge gap could be bridged by a more technical approach to examine the synergy possibilities as provided by the full range of product groups in GPP contra ecolabelling.

Another gap is to collect detailed views of the professional purchasers. Current discussions point to the verification as a 'bottle neck', at least with today's available tools and information. Therefore, a next step in the exploration for possibilities to increase the contribution of ecolabelling in GPP could focus on views of the professional procurers and the possibilities for verification – externally or internally.

Furthermore, pertaining to the suggestions of establishing core criteria within the ecolabelling realm will benefit from a comprehensive and detailed examination of the technical possibilities with formats and functions of current ecolabelling criteria (and the scope of flexibility without jeopardizing current market effects). A pilot project has been initiated but should be further analysed and evaluated. For the further development of core criteria, it will be necessary to prioritise product groups that are suitable to put initial focus on. There is, moreover, a need to address suitable funding models for this additional work-load that include personnel from the ecolabelling scheme.

Moreover, and on the rim of the scope of this study, it can be seen as worthwhile to further discuss the influence the structure and organisation for the GPP criteria development and to which extent a Nordic/international cooperation can be further enhanced. The idea has been touched upon in literature as well as in the workshop discussions. At the same time, it should be acknowledged that national adjustments can be crucial in establishing and adopting centralized GPP criteria.

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Appendices

Appendix 1: Questions raised in the expert discussions

- What practical experiences do you have of using labels to formulate procurement requirements? Please tell us which product groups for which ecolabelling used, and in what manner it has been used (in whole or in part, as verification or as criteria).
- Among the product groups, are there any differences in the conditions to adapt ecolabels for GPP (specific groups of products, physical products, services, etc.)?
- Is there any difference in the ability to use ecolabels for the procurement requirements between different types of acquisition (less central framework etc.)?
- Which parts of the related criteria can be used for the procurement requirements, ie the requirements or components of the criteria is more or less relevant? What is it that makes them more or less relevant?
- What features of ecolabelling and claims in GPP and you will see more or less useful for the other system (limits, evaluation requirements, scoring system etc. versus baseline and cutting-edge requirements)? What do you think the chances of any kind of harmonisation or common design?
- Do you see any other aspects or components of the two systems that may affect opportunities for integration between systems, such complicated language, high or low focus on product / service quality, certification procedures, etc.?
- What do you think are the main reasons that it can be difficult for purchasers to use the related criteria?
- What is your procedure for updating the related criteria and how these could adapted to better synchronise the award criteria that you use / develop?
- This applies to the updating frequency as well as the information use and expert participation.
- What would be possible to coordinate / synchronize?
- What would be needed to facilitate this work?
- Which actors (politicians, ecolabelling or GPP organisations, producers, purchasing organisations or otherwise) do you think can best help promote the increased use of ecolabelling in procurement and why?
- Where, do you think, are the largest gains from the start to coordinate ecolabelling and green Government Procurement (if any)?

Appendix 2: Workshop Report: The Swan 2015: The Nordic Swan's contribution to green public procurement

The objectives of the workshop were:

- To present findings from the preliminary report and thus creating a 'level playing field' among the present actors;
- To identify the main technical problems, issues and possibilities for a higher degree of utilisation of synergies between the Swan and the Nordic GPP systems;
- To discuss future scenarios, and gather suggestions and ideas, for potential cooperation between the aforementioned systems; and
- To allow for the actors represented to bring forward their ideas and suggestions.

The workshop was based on two sessions: the first one focusing on the criteria structures and functions, and the second one on the criteria development processes and the organisation of tasks. Some individual organizations were also presenting their thoughts and ideas; however, these are not included in this report.

The participants in the workshop were chosen based on their professional experience and involvement in the application or management of GPP or ecolabelling, both as bodies directly involved in the application or institutions and actors in the systems.

Prior to the workshop a background document on relevant results from expert interviews and literature findings was distributed to the participants in order to provide a common starting point. The preliminary report together with the workshop findings will also feed into the project report.

In the workshop, the participants were divided into three groups discussing the same issues in parallel. This workshop report provides a synthesis of the group discussions, as well as on the discussions that followed, including individual comments.

Workshop session 1: Structures and functions of environmental demands in GPP vs. in the Swan

The purpose of the first session in the workshop was to examine the environmental requirements in ecolabelling and in GPP, by allowing the actors involved discuss the different preconditions and obstacles that are relevant for any work towards enabling more synergies between the two systems. The topics discussed in the first workshop session were:

- The possibility for verification in GPP.
- Different ways of formulating environmental requirements and the possibility to verify them.
- The possibility to identify core requirements from the Swan to be used in GPP.
- Other barriers for public purchasers to use ecolabelling criteria.

Workshop session 2: Actors and processes

The background to the second workshop session was that already now some degree of exchange takes place between ecolabelling and various GPP systems, but that they are for the most part not formalised or systematic. The session therefore focused on the practical ways to better make use of the synergies between the two systems and their work with environmental criteria development. The session highlighted the roles of the actors in the selection and possibilities of different of product groups, who should formulate GPP requirements (considering the different approaches of different actors, and the variations in knowledge and resources), and ways forward. The specific questions discussed were:

- The potential roles of relevant actors
- Ways for practical cooperation
- Identifying product groups and environmental requirements most suitable for a cooperative development process

Appendix 3: Workshop participants

Name	Organization	Country
Anna Sigurveig Ragnarsdóttir	Ecolabelling Iceland	Iceland
Bente Næss	Miljøverndepartementet	Norway
Björn-Erik Lönn	Nordic Ecolabelling	Norway
Camilla Sederholm	NMRS/HKP-gruppen	Finland
Claus Egeris	Ecostory	Denmark
Elva Rakel Jónsdóttir	Ecolabelling Iceland	Iceland
Isa-Maria Bergman	Motiva Finland	Finland
Jakob Zeuten	Dansk Erhverv	Denmark
Jeppe Frydendal	Ecolabelling Denmark	Denmark
Maria Sundesten Zacharias	Ecolabelling Sweden	Sweden
Morten Leuch Elieson	Miljøfyrtårn	Norway
Peter Nohrstedt	Miljöstyvningsrådet	Sweden
Ragnar Unge	Ecolabelling Sweden	Sweden
Rikke Dreyer	SKI	Denmark
Sören Enholm	TCO	Sweden
Søren Mørch Andersen	Miljøstyrelsen	Denmark
Tina Sternest	Confederation of Danish Industries	Denmark
Tormod Lien	Ecolabelling Norway	Norway
Charlotte Leire	IIIEE Lunds Universitet	Sweden
Thomas Lindhqvist	IIIEE Lunds Universitet	Sweden
Åke Thidell	IIIEE Lunds Universitet	Sweden

Appendix 4: Review of criteria documents from the Nordic GPP systems and from Nordic Ecolabelling

Hotel services

	The Swan	Swedish GPP	Norwegian GPP	Comments
Definition of the product or service				
How is the product group defined?	<p>The broad definition is facilities offering overnight possibilities.</p> <p>Hotel and youth hostel, including conference localities.</p> <p>Hotels are divided into three types depending on size and offerings. This classification is identical to the Norwegian GPP and to MSR.</p> <p>The definition of unit guest night is constructed the same as for MSR GPP</p>	<p>Hotel services as part of travel services. Hotel services are defined as guestnights or the using of conference rooms.</p> <p>Hotels are divided into three types depending on size and offerings. This classification is identical to the Swan and to Norwegian GPP.</p> <p>The definition of one guest-night is constructed the same as for the Swan.</p>	<p>Hotel services including breakfast.</p> <p>The unit of analysis is not specified in more detail than “guestnight”.</p> <p>Hotels are divided into three types depending on size and offerings.</p> <p>This classification is identical to the Swan and to MSR</p>	<p>The definition of the product group and the classification of sub-categories and the functional unit ‘guestnight’ are basically identical for the three systems.</p>
Environmental requirements				
Number of requirements (including subsidiary questions for bonus points/more advanced levels).	<p>A total of 36 mandatory criteria and 68 point criteria but fewer depending on the size (type of hotel) and additional services (pool, etc.) provided by the hotel.</p>	<p>Depends on the stringency level chosen.</p> <p>Basic level: approx. 10 areas of requirements,</p> <p>Advanced level: 5 stricter requirements</p> <p>Spearhead: stricter and additional requirements.</p>	<p>Qualification: 3</p> <p>Award criteria: 4</p>	

		There is some flexibility on some criteria to be used as mandatory or contract criteria. No award criteria.		
Environmental scope of the criteria				
Which environmental aspects are addressed?	Quantifiable criteria. Four threshold levels for energy and water consumption, chemical products and waste management. Foodstuff	The criteria focus on energy, water and waste. Environmental statistics and management system. The three levels of stringency are described in terms of market supply and of ease of verification.	Transport (information on accessibility by public transport), energy, waste, chemicals, water, food	The core areas are identical however differently phrased in requirements. This is a product group with several auxiliary requirements whereof some are unique or phrased in unique ways.
The activities/operations concerned	The environmental criteria regard operation and maintenance, facilities and purchased products, guest rooms kitchen and dining room restaurant, cleaning and laundry, transports	Procurement of products is also covered: textiles, paper products, cleaning products and other products, as well as for waste management. Ecological food, waste (weight), chemicals (weight), water (volume). The hotel must offer solutions for paperless administration and payments. Spearhead requirement: opportunity for video conferencing.	Not specified.	The Swan and the Swedish GPP system are basically overlapping concerning activities and operations (explicitly) addressed.
Which lifecycle aspects are covered?	The service provider, purchases (Production is covered as far as ecolabelled products	The criteria only regard the service provider and the products use for the service deliv-	For food product criteria are used. For all other criteria supplier performance criteria	In practice similar, however phrased differently.

	<p>go).</p> <p>One of the options in the basic criteria is that waste should be sorted. The other option is that the hotel should fulfil specified ecolabel criteria.</p> <p>Transports to/from the establishment.</p> <p>Including renovation and construction.</p>	<p>ered.</p> <p>Production is covered as far as ecolabelled products go.</p> <p>One of the options in the basic criteria is that waste should be sorted. The other option is that the hotel should fulfil specified ecolabel criteria.</p>	<p>are used.</p> <p>Only related to the service and its related consumption.</p> <p>No criteria for the product properties used in the service.</p> <p>Transport information.</p>	
Number of and type of criteria on chemicals	<p>Bonus points criteria when fulfilling threshold values on chemicals.</p>	<p>On the basic level, instructions and product information is a requirements.</p> <p>For the advanced level, there is an added criteria on the usage (weight) of chemicals is restricted.</p> <p>For spearhead level, there is an additional added criterion on chemicals: ecolabelling for 90% of the chemicals used should be ecolabelled.</p>	<p>One question, chemicals is required to not exceed a certain weight.</p>	<p>Common area but addressed differently. The Swan and Swedish GPP consider properties of products and components while Norwegian GPP consider amount of chemical products consumed.</p>
Number of and type of criteria on energy	<p>Mandatory criteria on energy consumption not to exceed threshold value. Here, the hotel can choose to calculate based on guestnight, or on surface area.</p> <p>Energy consumption is measured in accordance with geo-</p>	<p>On all three levels of criteria, energy consumption must not exceed a certain KWh-usage, which is linked to the geographical location of the hotel.</p>	<p>In the qualification criteria it states that the hotel should measure and monitor the energy consumption.</p> <p>In the award criteria points are given for energy consumption in accordance with geographical location of the hotel.</p>	<p>Similar approach.</p>

	graphical location of the hotel.			
Questions on EMS?	Yes, the Swan requires the hotel to have a documented environmental management system with a number specified routines described. This is one way to demonstrate the basic qualification.	Yes, EMS, together with other criteria, is accepted as one type of criteria fulfilment. The other alternative is ecolabelling.	Not as criteria, however EMS is accepted as means of verification for one criterion.	No demand for certified/verified EMS but suggest ISO 14001, EMAS, Lighthouse, etc.
Other aspects (single issues)	Working environment			
Criteria formulation				
How are the criteria formulated? (thresholds, fulfilment incl. avoidance, points)	Mandatory criterion are given for energy consumption products, guest rooms kitchen, food products, cleaning and laundry, waste, transport, and some mandatory criteria for youth hostels, pool facilities etc. Extra points are also offered in the above categories. Threshold values for energy, water, chemicals and waste.	Three levels: basic, advanced and spearhead. Threshold values for water, energy, chemicals etc. No point systems.	Threshold values for energy, water and waste, chemicals. Points are used for additional areas, to be used as award criteria	The Swan has a combination of threshold value requirements and awarding point score requirements. The GPP systems use threshold values.
Is data based on average or is it allocated per product/service type.	Energy and water consumption is divided per guestnights. Chemical products are measured in weight per guestnight. Unsorted waste is measured in weight per guestnight.	Average is accepted, the unit is guestnights. For electricity, it is kwh/guestnight. For all water is distributed per guestnight.	Average is accepted, the unit is guestnights.	Average figures calculated per guest-night is used by all systems.
Are the more advanced criteria based on additional criteria or	Both. The point system allows for	Both. Additional criteria types are added on the more stringent	No, the criterion is pass/fail based.	

higher in stringency?	flexibility on where to earn them.	levels. Also, more ecolabelling is required in the more advanced levels.		
Guidance				
What background information is provided?	Brief introduction			
Is it explained which environmental aspects that seen as important?	Yes, in the introduction	<p>Not in the criteria document itself. But market analysis is available in a separate document.</p> <p>A pre-study for the wider category (travel services) is available as a separate document.</p>	Brief, about the main environmental impacts of hotel services and the corresponding requirements (as an overview). Moreover, a more detailed background documents is available as a separate document.	
What guidance is provided?	Purpose, how to use, about the environmental impacts of the service	<p>Purpose of the criteria document, about the three levels of stringency, how to use the criteria document (criteria and layout needs to be adjusted to the situation), instructions on how to ask for verification.</p> <p>Instructions included on how to calculate the applicable unit (guestnight) also for day-guests</p>	<p>Some basic information about public procurement and that some criteria in the doc need to be adjusted.</p> <p>The point system is not very well described.</p>	
Reference to ecolabelling				
Do the criteria refer to ecolabelling, either as a standard or as licensed products?	The use of ecolabelled services or products grants extra points. Requirements for purchasing	Yes, ecolabelled hotels are given as an option for verification/approach on all three levels of the criteria (basic,	Ecolabelling is listed as a means of verification for the qualification criteria and for energy consumption.	Both ecolabelled products purchased, some requirements and verification.

	<p>ecolabelled products (not exclusively the Swan)</p>	<p>advanced and spearhead).</p> <p>On all levels, a certain portion of the laundry detergents and cleaning products are required to fulfil the criteria of ecolabelling.</p> <p>On the spearhead level, ecolabelled products (fish products, chemicals, and other food) are to a certain degree mandatory.</p> <p>The higher the level the more ecolabelling licenses are recommended as means of verification.</p>	<p>The Swan is referred to as a suggested background material.</p> <p>There are no suggestions on using ecolabelled products (chemicals, electricity) except for food.</p>	
Procurement-adjusted				
<p>Where in the procurement cycle are the criteria intended for?</p>	<p>Not specified.</p>	<p>The criteria are mainly formulated as contract criteria, i.e. they are valid under the service time period.</p> <p>There are mandatory criteria for the supplier.</p> <p>There are no criteria for evaluation.</p> <p>There are contract criteria for providing the service.</p>	<p>Suggested for central purchase agreements. Award criteria are on the same environmental aspects as in mandatory criteria, and with additional criteria on food.</p> <p>Qualification criteria are smoke-free rooms, transport, and systems to measure energy, waste, chemicals and water use.</p>	

Verification				
What options to verify are stated?	Examination of Self declarations and calculations, lists, documentation of routines, descriptions, consumption numbers taken from invoices. On-site inspections Verifications from suppliers are also required.	For the mandatory requirements, different criteria come with different suggestions on self-declarations, EMS or ecolabelling licenses or equivalent.	For technical specifications it is self-declaration. For qualification criteria it is a range from self-declaration to license from different types of EMS and ecolabelling. The possibility to move qualification criteria over to contract criteria is also given, provided there is a time plan specified for fulfilling the criteria. For award criteria it is self-declaration or the Swan (in particular). For the criteria on food, Nordic food ecolabels are suggested as options.	Ecolabels are frequently mentioned as verification as well as different external verifications of environmental management systems. GPP compliance should be verified by the purchasers based on declarations and documentation from producers.
Who, on average, can conduct the verification?	Staff of the national competent body.	The procurer, with audits of the service provider. Also, the suppliers of the supplier can help to verify.	The self-declarations concern consumption of water, electricity, the setup and offerings of the hotel, if the hotel has systems for consumption and use (water, waste, energy and chemicals), The procurement organization can do audits.	
Development and updating				
Date of version	Version 3.3 14 June 2007 – 30 June 2013	2009-12-09 (original version)	1 Jan 2008	

Cleaning products

	The Swan	Swedish GPP	Danish GPP	Comments
Definition of the product or service				
Product group definition	<p>The product group encompasses cleaning products intended for indoor, general and regular cleaning of the following areas:</p> <ul style="list-style-type: none"> - fixed surfaces (floors, walls, ceilings, doors, tiles and windows) - kitchen equipment (for example tiles, work surfaces, kitchen machines, taps) - sanitary installations (toilets, baths, showers, wash basins, taps) <p>The products can be intended for use by consumer and/or professional users.</p>	<p>Both chemical products and cosmetic and hygiene products for professional hygiene, cleaning and maintenance.</p> <p>The criteria document lists 36 product types. A full list of product groups applicable is available as a separate document.</p>	<p>Requirements are divided into those intended for smaller and larger procurement scopes</p>	<p>This product group consists of several different kinds of products that basically are overlapping. They either list individual product types or include them in categories.</p> <p>The criteria of the Swan explicitly mention that the products also could be used for professional purposes.</p>

Environmental requirements				
Number of criteria (including subsidiary questions for bonus points/more advanced levels)	<p>A total of 31 requirements. All needed to be granted the license.</p> <p>Requirements are divided into:</p> <ul style="list-style-type: none"> -in-going substances (excluding pollutants from raw material production): 18 requirements - effectiveness: 1 requirement -packaging: 4 requirements. -quality: 8 requirements. 	<p>Offers requirements of three levels: basic, advanced and spearhead, which build upon each other.</p> <p>Qualification requirements: 1 (basic)</p> <p>Technical specification: 10-11 (basic) 3 (advanced) 1 (spearhead)</p> <p>Award criteria: 0</p> <p>Contract requirement: 1</p>	<p>Offers 5 requirements for small scope procurement and 12 requirements for large scope procurement.</p> <p>For bigger scope procurement, the requirements are structured according to</p> <ul style="list-style-type: none"> -The product -The content -The producer <p>Does not offer different levels of stringency.</p>	<p>The GPP systems cover fewer requirements than the Swan.</p> <p>The Swedish GPP system allows for different levels of environmental stringency.</p>
Environmental scope of the criteria				
Which environmental aspects are addressed?	<p>Toxicity, human health, hazard, packaging (both weight/utility ratio and also recycling agreement).</p> <p>There should also be specific information on dosage on the package.</p>	<p>The document states that the requirements mainly address the properties of products and included substances, only in exceptional cases requirements are put on specifically named substances.</p> <p>The criteria cover seven environmental and health aspects: toxic substances for the environment, human health, allergens, resources use for the use of the products, resources use for the production, access to risk- and protection information, etc.</p>	<p>The product properties and the usage.</p> <p>Environmental toxicity, supplier environmental performance.</p> <p>Information of dosage.</p>	<p>In general, the different systems address the same environmental and health aspects and the use of the products.</p>

Which lifecycle aspects are covered?	Production (in the sense of declarations from raw material suppliers), use, (information for user on how to use the product), waste (packaging)	Use, production (ethanol should be produced from agriculture production),	Use, production (in the sense of ecolabelled products)	Basically the same for all systems.
Number of and type of criteria on chemicals	15 requirements: CMR substances, sensitizing substances, environmentally harmful substances, enzymes, surfactants, preservatives, dyestuffs, fragrance, phosphorous, CDV, aNBO, anNBO.	Ethanol, biocides, parabenes, allergenes, perfume,	For smaller procurement: 3; for larger procurement: 7	The ecolabel is more detailed in its requirements.
Number of and type of criteria on energy	None(information for user on how to use the product)	None	None	
Questions on EMS?	None	None	Yes, for larger procurement	
Other product-specific non-environmental aspects	Quality	Human toxicity, health and safety in work environment. The contract requirements concerns product safety sheet	work safety	
Criteria formulation				
How are the criteria formulated? (thresholds, fulfillment incl. avoidance, points).	Avoidance, thresholds, fulfillment of documented routines and procedures, declarations No point system.	Qualification: fulfillment (of documented routines) Technical specifications: fulfillment, avoidance, thresholds Award criteria: n/a Contract criteria: supplying information (product safety information)	Avoidance, fulfillment, guidance on how to rethink the need (recommendation on using microfiber-cloth to reduce water consumption and reduce the need for detergent. Nothing quantitative, no thresholds or fulfillment that is measurable.	Similar structures even if the Danish GPP system include recommendations for alternative cleaning.

		No point system.	No point system.	
Is threshold data based on average or is it allocated per product/service type.	To be calculated per product	Average (substance content in product)	Not applicable - No quantitative requirements included	Similar structures.
Guidance				
Is it explained which environmental aspects that seen as important?	Very brief information in introduction.	Brief description of the main aspects. The purpose with the setting these particular requirements (e.g. promote innovation), the span of aspects covering both lifecycle and risk perspectives.	No particular information on environmental aspects.	
What additional guidance is provided?	About the product group, information about the ecolabel. How to apply for a license, marketing of ecolabelled products, test methods and other test information.	Instructions on how to use the criteria and overview of the criteria are provided. Guidance with sample answers, justification and application documents are available as separate documents online	A justification of each requirement is provided, and in some cases also an explanation of how the content can be tested.	
Reference to ecolabelling				
Do the criteria refer to ecolabelling?	No	Yes, as an alternative mean of verification (EU Flower)	Yes, one of the proposed product-related requirements regard whether it is ecolabelled.	
Verification				
What options to verify are stated?	Formulation of the product, product data sheet, statement of exceptions, signed declarations, information, reference to DID-list, declaration from manufacturer (of fragrance), endorsement of calculation of content (of e.g. phosphorus), labeling of packaging according	Qualification: ISO 9001 or own declaration Technical specifications: product data sheet, data from EU Flower's DID-list, license from ecolabelling, supplier declaration, product declaration (in one case with	A OECD method is suggested as a means to test the content of ten-sides. Producers have to supply instructions and information on dosage. Ecolabelling as license alternatively other products fulfilling ecolabel-	The Swan verification is built on a combination of producer information, declarations, etc and on-site audit/inspection whilst the GPP systems primarily rely on information and statements of the producers.

	ing to DIN 6120 or equivalent labeling scheme, copy of agreement (recycling), sample of a label and product safety data sheet showing the wording of the information text), documentation of procedures, onsite audit by personnel from the scheme.	content information in weight percentage), IFRA-certificate together with a declaration from the raw-material supplier. Award criteria: n/a Contract criteria: supplier declaration	ling requirements. For the producer performance it is suggested that an EMS can lead to a serious take on environmental issues as well as OHS issues.	
Development and updating				
Date of version	Version 4.6 from 12 october 2010. Valid until 30 june 2014.	2011-12-20	Not specified	
Frequency of updating so far	Since the first version from 2007, updates have taken place every 1-2 years.	Varying – from some months to 3 years.	Not specified	
Are upcoming additional criteria specified?	No, but a commitment is stated that latest one year before new requirements the license holders will be informed about those.	Yes, in detail	No	

Paper products

	The Swan	Swedish GPP	Finnish GPP	Comments
Definition of the product or service				
How is the product group defined?	Wood-based and wood-free copy and printing paper and graphic board, based on cellulose and/or mechanical pulp, for writing, printing and copying. Only paper that has traceability from the paper manufacturer to retail dealer can be labeled. The product group is modular: the module on Copy and Printing Paper was selected for the study.	Soft tissue, printing and copy paper.	Office paper and envelopes, including thousands of different products. The product group is modular: the module on Copy and Printing Paper was selected for the study.	Similar definitions. The Swan has separate criteria for envelopes and the Swedish GPP excludes refined products but do not mention envelopes among those. The product group definition includes many different products.
Environmental requirements				
Number of criteria (including subsidiary questions for bonus points/more advanced levels)	One level only. Basic module requirements: 18 Chemical module requirements: 14 Supplementary module requirements: 5, excluding those that refer to the basic and chemical modules.	Basic, advanced and spearhead levels. Qualification requirements on the producer: 1 Qualification requirements on the product: 5 basic, 1 advanced, 1 spearhead (7 in total) Award requirements: 2 spearhead Contract requirements: 1	No differentiation. Office paper: 4 requirements; for envelopes: 5 requirements (additional requirement as regards envelope window and glue for sealing the envelope).	The Swan has by number more requirements and that are more detailed.

		basic		
Environmental scope of the criteria				
Which environmental aspects are addressed?	Chemicals, energy, recycling system for products and packages.	No requirements on recycled fiber content due to market factors.	Recycled materials, chemicals, biodiversity (for raw materials of fiber), waste water	We notice that the environmental scope of the different systems overlap in general. The Finnish GPP criteria do not include forestry.
Which lifecycle aspects are covered?	Chemicals: manufacturing of pulp and paper. Basic module: forestry management, emissions, energy use and waste disposal for paper and pulp production. Supplementary module: forestry Requirements on climate impacts from transports.	Production	Production (materials and chemicals used, including recycled contents), packaging	
Number of and type of criteria on chemicals	Basic module requirements: 1, which refers to the fulfilling the chemical module. Chemical module requirements: 2 that apply to all chemicals and 12 that apply to specific chemicals Supplementary module requirements: 0	Bleaching method (no chlorine gas)	For paper: 4 requirements (no chlorine gas, surfactants, de-inking agents, biocides, etc.	Similar requirements. The Ecolabels set the standard.
Number of and type of criteria on energy	Basic module requirements: 3 Chemical module require-	Low emissions of CO ₂	Paper : 2, of which 1 must be selected Envelopes: 2, of which 1	

	ments: 0 Supplementary module requirements: 0 CO ₂ emissions from transport and distribution.		must be selected. (content of recycled fibers or low emissions of CO ₂)	
Questions on EMS?	Yes, could replace requirement on waste	Routines that could be administrated by an EMS	No	Not emphasizes but seen as useful for certain requirements.
Other non-environmental aspects	Quality, annual reporting, regulatory requirements. Although of environmental concern, it can be worth to point out that a question on GMO is included!	Yes, legal aspects. High conservation values.	No	
Criteria formulation				
How are the criteria formulated? (Thresholds, fulfillment incl. avoidance, points).	Fulfilment, thresholds, avoidance. No points system.	Fulfilment, thresholds. Uses emission calculation method of the EU Ecolabel for COD, P, S and NOx.	Thresholds, fulfillment, avoidance	Many similarities.
Is threshold data based on average or is it allocated per product/service type.	For chemicals, the requirements, the use excludes certain activities in the pulp and paper production. For energy, the calculations encompass the entire production process (both paper and pulp production), but does not include filler. The calculations do not include energy con-	Allocated per total production.	Allocation calculations based on 12 month production.	

	sumed in transporting raw materials or in converting or packaging.			
Are the more advanced criteria based on additional criteria or same criteria but tougher?	More stringent thresholds (chemicals and energy)	A lower threshold.	No differentiation	
Guidance				
Is it explained which environmental aspects that seen as important?	Not more than that the aspects related to forestry management, emissions, energy use and waste disposal in regard to pulp and paper.	Yes. Emissions to water and air from production. Greenhouse gases. Controversial sources of raw materials. Further explanations of the environmental impacts of the selected environmental aspects for the requirements are provided together with the requirements (instead of in a collected place).	Yes Climate, chemicals, water and waste	
What guidance is provided?	About the label and the application for license. In respective module some guidance on terms used in the requirements, scope of requirements.	Overview of criteria, definitions, instructions on how to use the requirements. Background document, guidance for application of requirements, and application of verification are available as separate documents.	That the requirements are based on those for the Nordic Swan and for the EU Ecolabel.	

Reference to ecolabelling				
Do the criteria refer to ecolabelling?	No	Ecolabelling is suggested as means of verification	Yes, for almost all requirements ecolabelling is given as an option to demonstrate fulfillment. Moreover, at the beginning of the document it says that the requirements are based on those for the Nordic Swan and for the EU Ecolabel.	
Verification				
What options to verify are stated?	To obtain the license, on-site inspection is required to supplement declarations and documentation proofing criteria compliance.	Suggested verification: EU Ecolabelling, supplier declarations (technical documents demonstrating fulfillment), FSC- or PEFC labeled products coupled with FSC's certification for controlled wood. More information on options for verifications is provided in the supplementary document.	Clear specifications on verification methods including ecolabelling licenses or a signed document that the requirements are fulfilled. For CO ₂ emissions, detailed calculations or test reports, or FSC or PEFC certification, or Paper Profile.	

<i>Development and updating</i>				
Date of version	2011-06-22 (basic module)	2011-09-15	2010-05-24	
Frequency of updating so far	Roughly every 5 years.	Varying, up to three years.	Not specified.	
Are upcoming additional criteria specified?	Yes: 'the following issues should be actively considered for the next revision: levels stipulated in requirements on energy and CO ₂ , requirements on quantities of certified fibers, requirements limits for emissions to water and air, requirements on transports '	Yes: criteria for sustainable/responsible forestry, influence from BREEF/BAT-work and new Swan criteria, social requirements.	No	