

**GREEN
PROCUREMENT
AND CONTRACTING
PROGRAM OF THE
BASQUE COUNTRY
2030**

EVALUATION REPORT

2021 - 2025



This report sets out the activities carried out under the 2021-2025 Action Plan for the Basque Country's Green Procurement and Contracting Programme, as well as a comprehensive evaluation of the programme.

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01.

EXECUTIVE SUMMARY



The period 2021–2025 saw the effective consolidation of the Basque Country's 2030 Green Public Procurement Programme as a strategic instrument for public policies on sustainability, the energy transition and the circular economy. During this period, green public procurement went from being an initial phase of development and gradual expansion to a practice that has become increasingly integrated into Basque public procurement.

The progress made is built on the fact that the institutional and regulatory framework has been significantly strengthened. More specifically, the inclusion of green public procurement in Article 84 of Law 10/2021 on Environmental Administration in the Basque Country has cemented its structural role within public policy by making the integration of environmental criteria into public procurement mandatory. Subsequently, Law 1/2024 on Energy Transition and Climate Change reinforced this approach by introducing explicit references to the carbon footprint and decarbonisation of public procurement.

In terms of implementation, the results showed that environmental criteria have been integrated to a high degree across most priority categories, and that the overall level of green procurement exceeded the interim target set for 2025. This period also made it possible to strengthen technical support for participating organisations through services to make specifications, support tools, in-

ter-institutional coordination areas and training initiatives aimed at public sector staff greener.

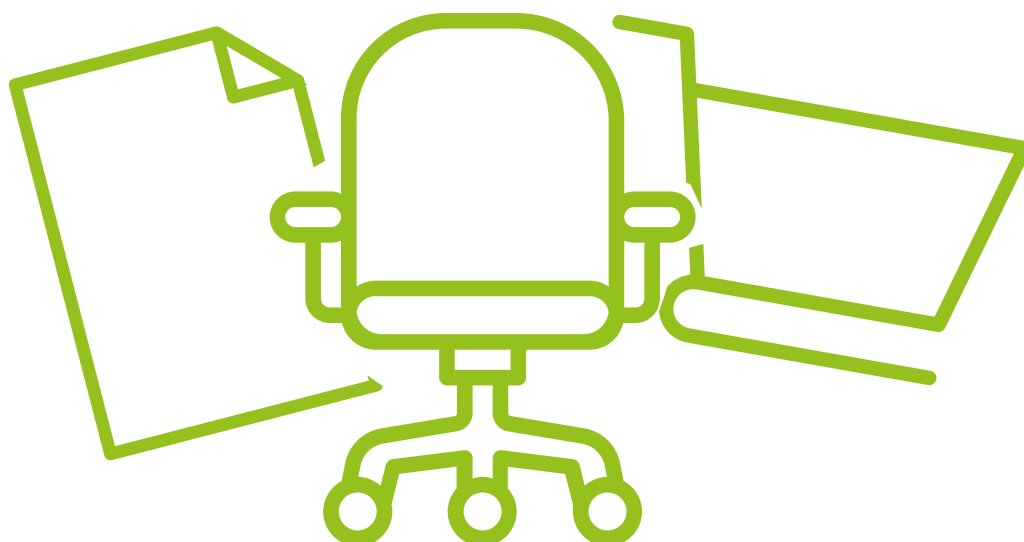
At the same time, an analysis carried out highlighted certain structural constraints that limited the scope of the programme. The level of institutional uptake fell short of the targets set, and no specific framework has yet been developed to facilitate the involvement of companies in private-sector-led green procurement. Nor have clear incentives been put in place to ensure that green procurement is systematically integrated into their procurement strategies. There is still room for improvement when it comes to monitoring the implementation of regulatory instruments, such as the directive on the inclusion of environmental clauses and certain obligations arising from environmental legislation.

An analysis of the results also showed differences in the level of uptake between procurement categories and public bodies, and that the impact was still limited in certain procurement segments with a higher economic volume. Added to this is the inherent complexity of measuring the environmental benefits associated with green public procurement. This is also an international challenge, owing to the wide range of contracts, the limited availability of environmental data and the difficulty in establishing comparable methodologies. Similarly, assessing the economic benefits of green procurement is highly challenging: these benefits may take the form of either specific savings for the purchasing entity, the estimation of which

requires life-cycle cost analysis methodologies, or the creation of new market niches by generating specialised demand. Although this potential is significant, it was not quantified during the period under review and was identified as an area for development in the next cycle.

In this context, the 2026-2030 cycle should be viewed as an in-depth, targeted phase, aimed at maximising the impact of green procurement, strengthening governance and monitoring mechanisms, and adapting criteria and tools to the new European regulatory framework on decarbonisation, the circular economy and product traceability.

The planned development will not be a break with the previous model, but rather its evolution towards a more selective, results-oriented approach. In this new phase, it will be essential to prioritise areas and entities with the greatest potential for impact, enhance the strategic value of participating in the programme, and explore mechanisms to stimulate private-sector demand for sustainable products and services through market incentives that support the transition without undermining the competitiveness of the Basque business sector.



02.

OBJECTIVE AND METHODOLOGY OF THE REPORT

This report assesses the **2021–2025 period of the Green Procurement and Contracting Program of the Basque Country 2030**, which covers the first five-year cycle of its Action Plan. The programme is spearheaded by the Basque Government's Department of Finance and the Department of Industry, Energy Transition and Sustainability, with Ihobe, the Public Environmental Management Company, acting as the technical secretariat.

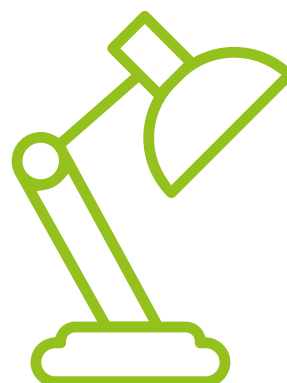
The assessment was carried out in line with the provisions of the Programme and was intended to be a strategic review tool to evaluate the results obtained and guide the planning of the 2026–2030 Action Plan. The approach adopted aims to provide a concise, strategic overview of the period under review: this is not a technical or procedural review of each individual action, but rather an overall assessment of the process of consolidating and rolling out green procurement across the Basque public sector as a whole.

STRUCTURE OF THE ASSESSMENT

The report is structured around two complementary yet distinct dimensions:

- **Chapter 4 – Implementation of the Plan:** assesses the extent to which the actions planned in each of the Programme's five areas have been carried out, both in terms of progress on the actions and implementation of the budget.
- **Chapter 5 – Results:** analyses the achievements of this implementation, measuring the extent to which the Programme's strategic objectives have been met through its monitoring indicators.

This distinction makes it possible to clearly separate the effort made from the results achieved.





MEASUREMENT METHODOLOGY

Progress has been measured based on three factors:

- **Implementation of actions:** – assessment of the progress of each action based on the criteria set out in Table 1.

Status of the action	Weighted degree of progress
Not started	0 %
Started	25 %
Advanced	50 %
Very advanced	75 %
Completed	100 %
Discarded	No weighting

Table 1. Colour scale used to weight the progress of initiatives.

- **Financial implementation:** the extent to which the budget allocated to carrying out the measures has been used.
- **Results of the Plan:** a semi-quantitative assessment of the degree of compliance with the monitoring indicators, based on the criteria set out in Table 2.

Assessment of the degree of fulfilment	
	If the value for the most recent year available does not exceed 75% of the target value
	If the value for the most recent year available exceeds 75% but is less than 90% of the target value
	If the value for the most recent year available is equal to or exceeds 90% of the target value

Table 2. Colour scale used to assess the level of compliance.

SOURCES OF INFORMATION

The following sources were used to prepare this report:

- Annual reports monitoring the implementation of the Programme (2021-2024).
- Calculation and analysis of performance indicators in 2025.
- Documentation related to the activities and services provided by Ihobe.
- Specialist publications, sector-specific monographs and trend reports.
- Materials from training courses and knowledge exchange forums on green public procurement.

03.

GREEN PROCUREMENT AND CONTRACTING PROGRAM OF THE BASQUE COUNTRY 2030

This section describes the conceptual, strategic and operating framework of the Green Procurement and Contracting Program of the Basque Country 2030, including its historical background, regulatory context and deployment structure.

THE PROGRAMME IN CONTEXT: HISTORY AND REGULATORY FRAMEWORK

Green procurement is a strategic tool used by public administrations to guide the procurement of

goods, works and services towards options with a lower environmental impact throughout their life cycle, thereby contributing to sustainability, the efficient use of resources, and a reduction in emissions and waste.

In the Basque Country, there is a **track record of gradually incorporating environmental criteria into public policy spanning more than two decades**. The current 2030 Programme is part of this evolution, which can be summarised in five stages:



2005: START OF THE PROCESS

In 2005, Ihobe began the process of making the public body's procurement contracts greener, by systematically incorporating environmental criteria into its procurement procedures. This pilot scheme was the practical starting point for green public procurement in the Basque Country and made it possible to develop initial technical and methodological capabilities.

2008: INTEGRATION INTO THE BASQUE GOVERNMENT'S PROCUREMENT PROCESS

An agreement was reached to incorporate social and environmental criteria, and other public policy considerations, into the Basque Government's procurement process. This step involved extending the approach beyond one-off initiatives and established public procurement as a tool for integrating sustainability objectives into public administration.

2011-2014: FIRST GREEN PUBLIC PROCUREMENT PROGRAMME

The first programme was approved and rolled out, laying down a structured framework for action, defining priority categories and systematising environmental criteria across different areas of procurement.

2015-2020: SECOND GREEN PUBLIC PROCUREMENT PROGRAMME

The second programme built on and consolidated previous work, refining the definition of criteria, expanding the categories and strengthening technical support for public bodies. This stage helped establish green procurement as a standard practice in certain areas of Basque public procurement.

2021-2030: CURRENT GREEN PROCUREMENT AND CONTRACTING PROGRAM OF THE BASQUE COUNTRY 2030

The 2030 Programme represents a qualitative leap forward by integrating green procurement into a long-term strategic framework that is in line with the climate, environmental and industrial goals of the Basque Country and the European Union. It is structured around various areas and lines of action, takes a five-year view through action plans, and has a stronger institutional, economic and market focus.

FIT WITHIN THE BASQUE COUNTRY'S REGULATORY AND STRATEGIC FRAMEWORK (2021-2025)

During the period covered, green public procurement became firmly established within the region's main regulatory frameworks:

- **Law 10/2021 on Environmental Administration in the Basque Country:** sets out the compulsory integration of environmental criteria into public procurement and the obligation to use at least 40% secondary raw materials in public works projects.
- **Law 1/2024 on Energy Transition and Climate Change in the Basque Country:** reinforces this approach by introducing an obligation to request the carbon footprint of products, services and supplies in public procurement processes, in line with the objective of climate neutrality by 2045-2050.
- **Basque Country Industry Plan 2030:** approved in 2025, it identifies green procurement as a driver of industrial transformation, with direct synergies in the circular economy, climate change adaptation and the engagement of suppliers through projects such as "BasqueESG".

Overall, this regulatory framework established green public procurement as a cross-cutting tool to support environmental, climate and industrial policy, and as a driver of economic and regional transformation.

GREEN PROCUREMENT AND CONTRACTING PROGRAM OF THE BASQUE COUNTRY 2030: VISION AND STRATEGIC OBJECTIVES

Green Procurement and Contracting Program of the Basque Country 2030 embodies the **consolidation of a process that began years ago and its evolution towards a long-term strategic framework** that is in line with current economic, climate and environmental challenges.

Building on experience gained in previous phases and taking the current political, economic and regulatory context into account, the Programme focuses its efforts on three main goals:

- Ensuring that green public procurement is consistent with Basque economic and environmental policy.
- Consolidating its systematic implementation in public bodies.
- Strengthening its role as a driver of the business sector, by promoting sustainable solutions that contribute simultaneously to both environmental performance and competitiveness.

The Programme is structured around a strategic **vision** that sets out the aspirations for green public procurement as a tool for transformation in the Basque Country, underpinned by a set of guiding **principles** that steer its practical implementation and by **objectives** that define and delineate the priority areas for transformation.

VISION

Use the purchasing power of the Basque public and private sectors in an effective, coordinated manner in line with the market to achieve sustainable socio-economic development that simultaneously maximises environmental protection, business competitiveness and the well-being of the people of the Basque Country.

PRINCIPLES

- Coherence.
- Transparency
- Shared responsibility.
- Cooperation.
- Efficiency and innovation.
- Awareness-raising and professionalisation.

OBJECTIVES

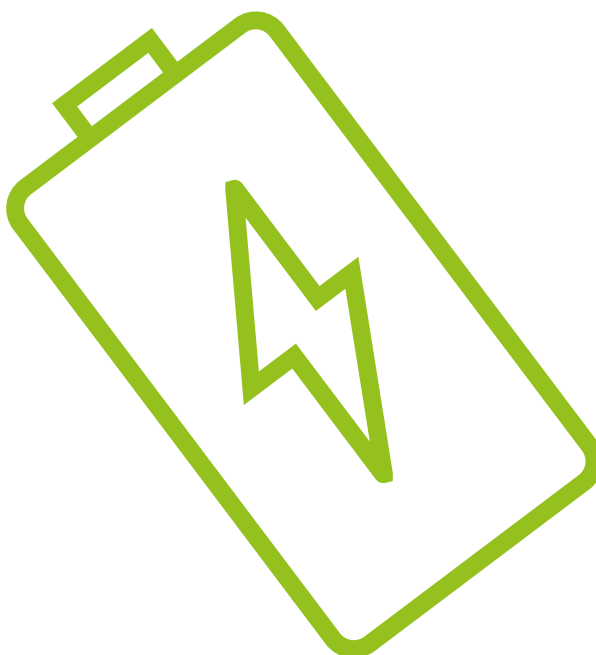
- Anchor green procurement in a robust legal framework and ensure support for environmental and economic policies and objectives.
 - Consolidate green public procurement throughout the Basque public sector
 - Implement green procurement in the Basque private sector as well.
 - Develop the green market with a high-quality, competitive Basque supply that is ready
 - Improve systems for monitoring and visualising impacts and benefits.
-

STRATEGIC OBJECTIVES

The Programme's strategic goals set out the commitments to progress in terms of institutional support, effective implementation and the economic

scope of green public procurement for the 2025 and 2030 time frames.

STRATEGIC OBJECTIVES	OBJECTIVE 2025	OBJECTIVE 2030
Number of public bodies participating in the Programme	75	150
Number of private entities participating in the Programme (purchasing entities)	20	50
Sustainable Development Goal: indicator 12.7.1 (out of 4.6 on procurement based on environmental criteria) ¹	4,0	4,2
Percentage of green public procurement in the programme's priority categories (number of tenders)	55 %	75 %
Percentage of green public procurement in the programme's priority categories (financial value)	55 %	75 %
Percentage of green public procurement out of total procurement (number of tenders)	40 %	60 %
Percentage of green public procurement out of total procurement (financial value)	40 %	60 %



¹ The SDG 12.7.1 indicator measures the extent to which sustainable public procurement policies and action plans have been implemented in countries, using a scale of 0 to 4.6 points. This scale assesses the level of institutional, regulatory and operational development achieved in the field of sustainable procurement. The Basque Country's Green Procurement and Contracting Programme 2030 sets a target of achieving a score of 4.0 by 2025 and 4.2 by 2030, having achieved a score of 3.9 at the end of the period assessed.

STRUCTURE AND ROLL-OUT

The Programme is structured around **five areas of work**, giving rise to **ten lines of action**, which are rolled out operationally through five-year action plans.

THE PROGRAMME'S AREAS OF ACTION AND LINES OF ACTION

A1. Consolidate green procurement as an essential tool in the roll-out of the Basque Country's policies

LA1. Strengthen the role of green procurement as an operational tool within the political and legal framework of the entire Basque public sector.

LA2. Ensure that green procurement is in line with the Basque Country's environmental and economic priorities.

A2. Make progress on the commitment to green procurement in the Basque public and private sectors

LA3. Secure the participation of the entire Basque public sector.

LA4. Raise awareness amongst and mobilise Basque companies

A3. Make green procurement a structural, innovative feature within organisations

LA5. Provide resources for systematic and strategic implementation.

LA6. Professionalise the role of procurement among all of the personnel involved.

A4. Have a suitable, high-quality market that is ready

LA7. Foster dialogue and collaboration with the market in order to find more innovative, sustainable and competitive solutions.

LA8. Prepare supplier companies, particularly SMEs, to meet the environmental requirements of contracting authorities.

A5. Highlight the progress, achievements and benefits of green procurement

LA9. Measure the implementation and estimate the benefits of environmentally sustainable procurement.

LA10. Publicise and promote the Basque Country's progress and achievements at a domestic, European and international level.

The first Action Plan for 2021-2025, evaluated in this report, sets out a total of **21 actions** under these 10 lines of action and 5 areas:

ACTION PLAN 2021-2025

LINE OF ACTION	ACTION	
LA1. Strengthen the role of green procurement as an operational tool within the political and legal framework	1	Draw up a Directive for the inclusion of environmental clauses in procurement by the Administration of the Autonomous Community and its public sector.
	2	Integrate green procurement into the Basque Country's relevant new regulations and policies.
LA2. Ensure that green procurement is in line with the Basque Country's environmental and economic priorities	3	Review the green procurement criteria and update them every 3 years to bring them into line with Basque priorities.
	4	Ensure that green procurement resources support the Basque Country's sustainable development priorities.
LA3. Secure the participation of the entire Basque public sector	5	Set up working groups, tailored to the profile of each administration, to speed up the incorporation of environmental criteria into tenders, using Udalsarea 2030 as the main network.
	6	Set up a working group to ensure that secondary materials are incorporated into public works, in accordance with the uses and quality standards set out in the Basque Country's Waste Prevention and Management Plan 2030.
LA4. Raise awareness and encourage Basque companies to get involved	7	Define a specific strategy/programme for green procurement in the Basque business sector, which will drive the incorporation of environmental criteria into the procurement processes of Basque companies.
	8	Strengthen the personalised support or advice service for making tenders greener.
LA5. Provide resources for systematic and strategic implementation	9	Develop and/or adapt technical tools and resources for green procurement.
	10	Launch pilot initiatives in underdeveloped areas of green procurement, focusing on priority areas such as life-cycle costs and the procurement of innovation.
LA6. Professionalise the procurement function for all personnel involved	11	Set up a regular training programme on green public procurement for the Basque public sector, among others, through the Basque Institute of Public Administration (IVAP).
	12	Develop material for induction manuals for new staff, explaining their strategic role and the obligation to take environmental criteria into account in their actions.
LA7. Foster dialogue and collaboration with the market	13	Set up channels for dialogue between contracting entities (public and private) and suppliers, focusing on product groups or priority areas, in order to identify needs, raise awareness of existing solutions and maximise outcomes, through mechanisms such as preliminary market consultations and a partnership programme for innovation, among others.
	14	Ensure that supplier companies are involved in developing new tools and resources.
LA8. Prepare supplier companies	15	Integrate green procurement into the Pyme Circular programme.
	16	Hold training sessions for suppliers on including environmental considerations in their goods and services and on preparing tenders.
LA9. Measure the implementation and estimate the benefits	17	Define a system for measuring benefits/results that makes it possible to identify the advantages of green public procurement.
	18	Integrate features that make it possible to calculate environmental benefits in existing green procurement criteria.
LA10. Publicise and promote the Basque Country's progress and achievements	19	Disseminate best practices and examples of green procurement specifications in the Basque public sector, including through half-yearly newsletters with news and updates on the subject.
	20	Secure greater participation by the Basque Country in the United Nations' "Sustainable Public Procurement Programme" and ICLEI's "Procura+" programmes.
	21	Hold an annual forum on public procurement to recognise and share experiences and speed up the incorporation of environmental criteria into procurement.

PUBLIC PROCUREMENT CATEGORIES

The Green Procurement and Contracting Program of the Basque Country 2030 sets out a set of **prioritised procurement categories** on which it focuses its efforts to develop and systematise

environmental criteria. These categories group together types of goods, works and services that are **particularly significant in terms of contract volume and potential environmental impact**.



The selection of priority categories is based on a number of complementary criteria:

- High potential impact on promoting the circular economy, mitigating and adapting to climate change, and protecting the environment and biodiversity.
- Existing prior commitments and developments in certain areas of procurement, which make it possible to consolidate and build on lines of work initiated in previous programmes.

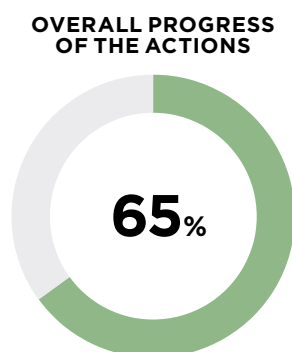
- Categories common to almost all of the Basque public sector, thereby facilitating a widespread, uniform roll-out of green procurement.

This approach makes it possible to focus the Programme's activities on areas with the greatest potential for transformation, from both an environmental and economic point of view.

04.

IMPLEMENTATION OF THE 2021-2025 ACTION PLAN

This chapter sets out the degree of implementation of the 2021-2025 Action Plan, both in general terms and for each of the areas into which it is structured, while also identifying the main progress made during the evaluation period.



Overall, the 2021-2025 Action Plan shows that **65% of the actions** have been completed, indicating a high level of implementation of the Plan, although there is also scope to complete certain actions and optimise implementation in the next phase, 2026-2030.

Below is a breakdown of the level of implementation of the 2021-2025 Action Plan for each of the Programme's five areas of action, describing in each case the main **milestones achieved and progress made** in the 2021-2025 period.

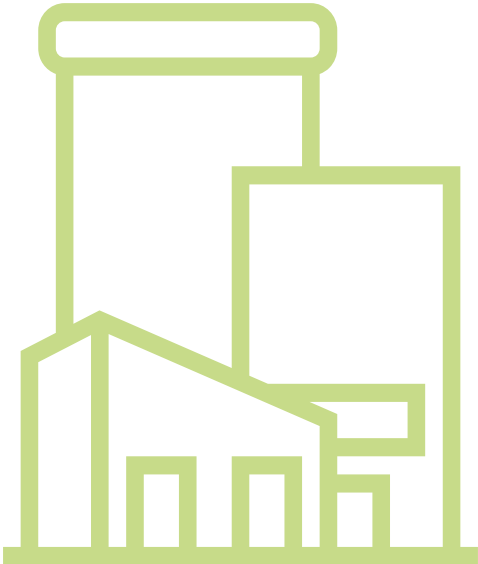
AREA 1: CONSOLIDATE GREEN PROCUREMENT AS AN ESSENTIAL TOOL IN THE ROLL-OUT OF THE BASQUE COUNTRY'S POLICIES

The aim of this area is to establish political and legislative recognition of green public procurement as a key tool for achieving the region's environmental and economic goals, thereby ensuring that it is integrated across all strategies, plans and regulatory frameworks at every level of the Basque public sector.

At the end of 2025, Area 1 showed an aggregate degree of completion of **81%**. Line of action 1 showed a **100%** degree of completion, while line of action 2 was **63%** complete.

AREA 1.
CONSOLIDATE GREEN PROCUREMENT AS AN ESSENTIAL TOOL IN
THE ROLL-OUT OF THE BASQUE COUNTRY’S POLICIES

PROGRESS OF ACTIONS UNDER AREA 1 81%	LINE OF ACTION 1: STRENGTHEN THE ROLE OF GREEN PROCUREMENT AS AN OPERATIONAL TOOL WITHIN THE POLITICAL AND LEGAL FRAMEWORK OF THE ENTIRE BASQUE PUBLIC SECTOR	LINE OF ACTION 2: ENSURE THAT GREEN PROCUREMENT IS IN LINE WITH THE BASQUE COUNTRY’S ENVIRONMENTAL AND ECONOMIC PRIORITIES
	PROGRESS LEVEL 100%	PROGRESS LEVEL 63%
	1. Draw up a Directive for the inclusion of environmental clauses in procurement by the Administration of the Autonomous Community and its public sector. 2. Integrate green procurement into the Basque Country’s relevant new regulations and policies.	3. Review the green procurement criteria and update them every 3 years to bring them into line with Basque priorities. 4. Ensure that green procurement resources support the Basque Country’s sustainable development priorities.



During the period 2021–2025, Area 1 focused significant efforts on incorporating green public procurement into the Basque Government’s key regulatory and strategic instruments, and on updating its technical implementation framework, achieving the following **milestones and progress**:

→ GREEN PUBLIC PROCUREMENT ENSHRINED IN 2 NEW REGULATIONS AND 3 PLANNING POLICIES

The adoption of **Law 10/2021 on Environmental Administration in the Basque Country** strengthened the legal framework for green public procurement and Article 84 introduced explicit obligations to incorporate environmental criteria into Basque public sector contracts.



LAW 10/2021, OF 9 DECEMBER, ON ENVIRONMENTAL ADMINISTRATION IN THE BASQUE COUNTRY

Law 10/2021 of 9 December on Environmental Administration in the Basque Country provided the legal framework to **update and modernise environmental policy in the Basque Country**, replacing and supplementing part of the previous legislation (e.g. Law 3/1998) to bring it into line with new environmental challenges and increasing regulatory complexity. It was devised as a comprehensive framework to incorporate the most advanced administrative intervention techniques, in line with society’s evolving demands and the need to reconcile economic activity with effective environmental protection.

Article 84 of the Law defines green public procurement as a means of better coordinating public action with the market, promoting eco-innovation and facilitating a more efficient use of resources by public administrations, all within the framework of a public procurement plan to be approved by the Basque Government.

It also requires procurement bodies to include criteria for awarding contracts, performance conditions and specific clauses in the specifications to make it possible to achieve the environmental objectives of the Law. Some of the considerations that may be included are reducing GHG emissions, using recycled and secondary materials, promoting renewable energy, purchasing local and organic products, and encouraging recycling and the use of reusable packaging, provided that these are relevant to the subject matter of the contract and are compatible with EU legislation

More specifically, in the case of works contracts, the law requires that the percentages of by-products, secondary raw materials and recycled materials to be used must be specified, **setting a compulsory minimum of 40%**, unless there are technical grounds for reducing this figure. The regulation requires that appropriate control mechanisms be put in place in this regard and, where appropriate, penalty clauses to ensure effective compliance with the environmental conditions set out in the specifications and throughout the performance of the contract.

The regulatory framework for green public procurement has also been strengthened with the adoption of **Law 1/2024 on Energy Transition and Climate Change**, which includes specific obligations relating to public procurement. The Law **establishes public procurement as an operational tool for decarbonisation and the energy transition**, introducing explicit references to the use of the carbon footprint for products, services and supplies in public procurement.

These two regulations join Law 4/2019 of 21 February, on energy sustainability in the Basque Country, to provide direct legal backing to green public procurement and reinforce its structural role within Basque environmental policy.



LAW 1/2024 OF FEBRUARY 8 ON ENERGY TRANSITION AND CLIMATE CHANGE

Law 1/2024 of 8 February, on Energy Transition and Climate Change in the Basque Country, by means of which the Basque Country will guide its climate and energy policy towards climate neutrality by 2050 at the latest. The regulation has been implemented in response to the scientific urgency raised by the IPCC regarding the increase in global temperatures and sets out a range of strategies, planning tools and governance mechanisms to drastically reduce greenhouse gas emissions, drive the energy transition, strengthen regional resilience and promote a more sustainable, competitive economy.

The aim is to provide the Basque Country with a clear, stable regulatory architecture that is in line with European commitments, integrating decarbonisation, climate adaptation and the promotion of innovation as cornerstones of Basque public policy.

TWO ARTICLES OF LAW 1/2024 EXPLICITLY RECOGNISE PUBLIC PROCUREMENT AS A TOOL TO BE USED FOR THE ENERGY AND CLIMATE TRANSITION.

More specifically, Article 57 – Carbon footprint of products, services and supplies in public procurement processes – sets out the following:

- The procurement bodies of Basque public administrations and other public sector entities will include the obligation to provide the carbon footprint of the products, services and supplies put out to tender in the administrative clauses and specific technical specifications of their contracts.

Furthermore, Article 28 – Access to renewable electricity for Basque companies – sets out the following:

- The Basque Public Administration will promote agreements for Basque companies to purchase electricity from renewable energy generation projects with a capacity of more than 5 MW in which it has a stake.

In addition, three strategic tools of the Basque Government have explicitly incorporated green public procurement as an operational tool for meeting their sectoral targets.

- The key actions outlined in the **Waste Prevention and Management Plan 2030** include the promotion of green public and private procurement, prioritising the stimulation of the supply and demand of materials made from secondary raw materials and compost bearing the European Ecolabel, produced from bio-waste from the Basque Country.
- The **Energy Transition and Climate Change Plan 2021-2024** proposes incorporating clauses into public and private procurement contracts to reduce greenhouse gas emissions and promote nature-based solutions, positioning the administration as a driving force in the energy transition.
- The **Circular Economy and Bioeconomy Plan 2024** identifies the promotion of a more circular consumption model as one of its strategic challenges and has included new circular economy and bioeconomy criteria into the Green Procurement and Contracting Program of the Basque Country 2030.

→ 31 CATEGORIES OF PRODUCTS AND SERVICES, WITH CONSTANTLY UPDATED CRITERIA THAT APPLY TO GREEN PUBLIC PROCUREMENT

The Basque Country currently has **31 categories of products and services for which environmental criteria for green public procurement have been defined, which have been tailored to the region and agreed with the local private sector**. 19 of these 31 categories are considered priority categories by the Programme. The criteria set out for each category are available to the public on the [lhobe website](#).

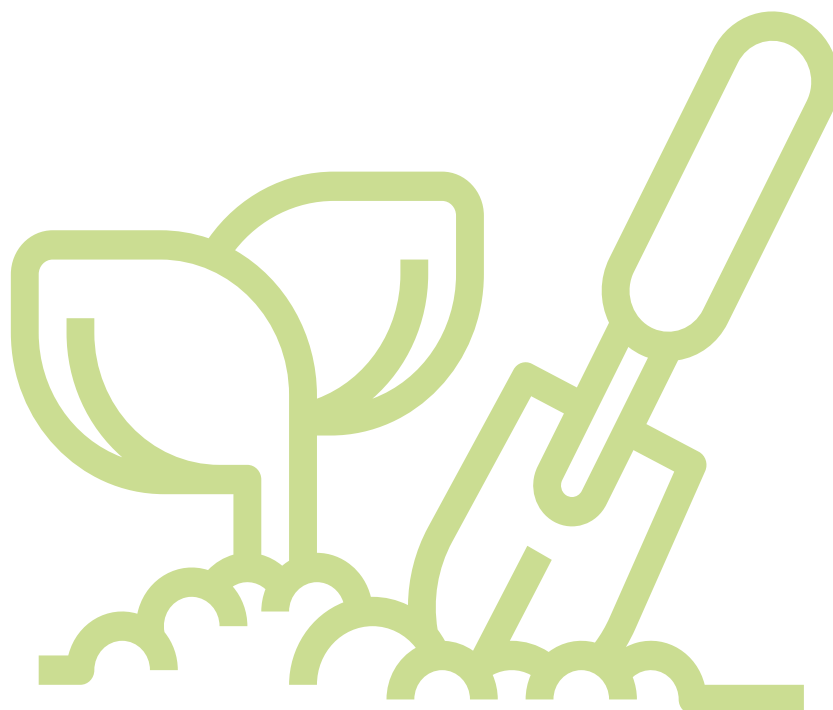
These criteria can be viewed as a practical, structured, adaptable tool, designed to help any public body integrate sustainability into its procurement processes. Their main strength lies in the fact that they offer different levels of stringency (basic, intermediate and advanced) making it possible to tailor environmental requirements to the sector's maturity, the type of contract and the capacity of bidders. They also include model texts that can be used verbatim in the specifications, as they directly include technical specifications, criteria for awarding contracts and performance conditions that are ready for use.



These criteria are constantly evolving to keep pace with developments in the market. The continuous improvement process has made it possible to systematically update simplified criteria in the priority categories, and to develop new, specific criteria for strategic areas such as street lighting, heavy goods vehicles and water infrastructure projects. Simplified versions of the criteria relating to projects and works, particularly in the fields of building construction, urban development, civil and hydraulic works, have been drawn up to facilitate the homogeneous integration of these requirements.

Areas for improvement and the need for technical updates and regulatory adjustments were identified based on the general analysis carried out in 2021 of the criteria published for more than 30 categories. In 2022, this process resulted in a systematic review of the simplified criteria for the 19 priority categories, incorporating technical improvements and aligning them with the Basque Country's new strategic framework.

This technical development culminated in the drafting of the '[**directive on the inclusion of environmental clauses**](#)' in the procurement processes of the Basque Administration and its public sector, which was approved in 2023. The directive set out minimum environmental criteria for works, services and supply contracts, thereby enhancing the consistency and exemplary attitude of the Basque public administration.





DIRECTIVE 1/2023, OF 7 MARCH 2023, ON THE INCLUSION OF ENVIRONMENTAL CLAUSES IN PROCUREMENT BY THE GENERAL ADMINISTRATION, INSTITUTIONAL ADMINISTRATION AND OTHER ENTITIES THAT MAKE UP THE PUBLIC SECTOR OF THE BASQUE COUNTRY



THE DIRECTIVE CALLS FOR ENVIRONMENTAL CRITERIA TO BE SET UP IN PUBLIC PROCUREMENT IN THE BASQUE COUNTRY.

Strategic goals of the directive:

- Using public procurement as a tool to make progress towards the Basque Country's environmental goals
- Ensuring a coordinated message from the Basque public sector to the market.
- Strengthening the government's role as a role model.
- Building capacity: standardising technical criteria and optimising public resources.

Scope of the directive:

- Applicable to works, services and supply contracts.
- Compulsory in open and simplified open procedures.
- The Directive is aimed at the procurement bodies within the general administration, institutional administration and other public sector entities in the Basque Country.

Categories affected:

The directive sets out minimum environmental criteria across 19 priority categories:

Food - Street lighting - Building construction and urban development - Electricity - IT equipment - Printing equipment - Landscaping - Furniture - Civil works and infrastructure - Textiles - Light goods vehicles - Heavy goods vehicles - Paper and office supplies - Building cleaning services - Bus transport - Publishing and printing - Events - Travel - Courier services

Specific obligations:

The Directive stipulates that environmental criteria must be included in both the specifications for administrative terms and conditions and the technical specifications, specifically in:

- Defining the subject matter of the contract
- Solvency criteria
- Technical specifications
- Criteria for awarding contracts
- and/or special implementation conditions

In any event, environmental criteria will account for at least 15 points of the total of 100 points that make up the criteria for awarding contracts.

Finally, it calls for the inclusion of a specific environmental performance clause in contracts of more than one year, with the successful bidder required to submit an annual report demonstrating compliance with the environmental clauses.

In line with the directive, in 2025 the Public Procurement Advisory Board started work on a recommendation **to incorporate award criteria other than price, and other objective qualitative criteria, into public procurement in the Basque Country**. The aim is to identify tools that enhance transparency, objectivity and effectiveness in quality assessments, ensuring that objective qualitative criteria can be measured and verified, and are directly linked to the purpose of the contract. From an environmental perspective, the recommendation makes direct reference to Directive 1/2003, and to the Green Procurement and Contracting Program of the Basque Country 2030 and its supporting resources. This recommendation was subsequently adopted in March 2026 and entitled **Recommendation 1/2026**.

The 2022 update to the criteria was coupled with the start of work on developing new criteria for high-impact categories, such as street lighting, heavy goods vehicles and hydraulic works, and drafting simplified versions of the existing criteria for the categories of building construction, urban development and civil works.

In 2024, the environmental criteria for the hydraulic works and public lighting categories were reviewed in consultation with public and private bodies, culminating in their publication in 2025.



NEW ENVIRONMENTAL CRITERIA FOR STREET LIGHTING

IN 2025, TECHNICAL DOCUMENTS WERE PUBLISHED SETTING OUT THE ENVIRONMENTAL CRITERIA THAT APPLY TO THE PUBLIC PROCUREMENT OF STREET LIGHTING, STRUCTURED AROUND TWO AREAS:

Drafting of lighting projects ([link](#)):

- Class A energy efficiency is compulsory for projects.
- Colour temperature limit of ≤ 3000 K to reduce light pollution.
- Energy efficiency requirements for lighting (>105 – 120 lm/W depending on the level).
- Minimum service life of up to 100,000 hours at an advanced level.
- Incorporation of eco-design criteria and a life cycle analysis.

Supply and installation of lighting ([link](#)):

- Control and remote management systems to optimise consumption.
- Energy monitoring of installations.
- Modularity and repairability requirements for lighting fixtures.
- Environmental management of waste and WEEE.
- Integration of minimum content requirements for secondary materials on site.

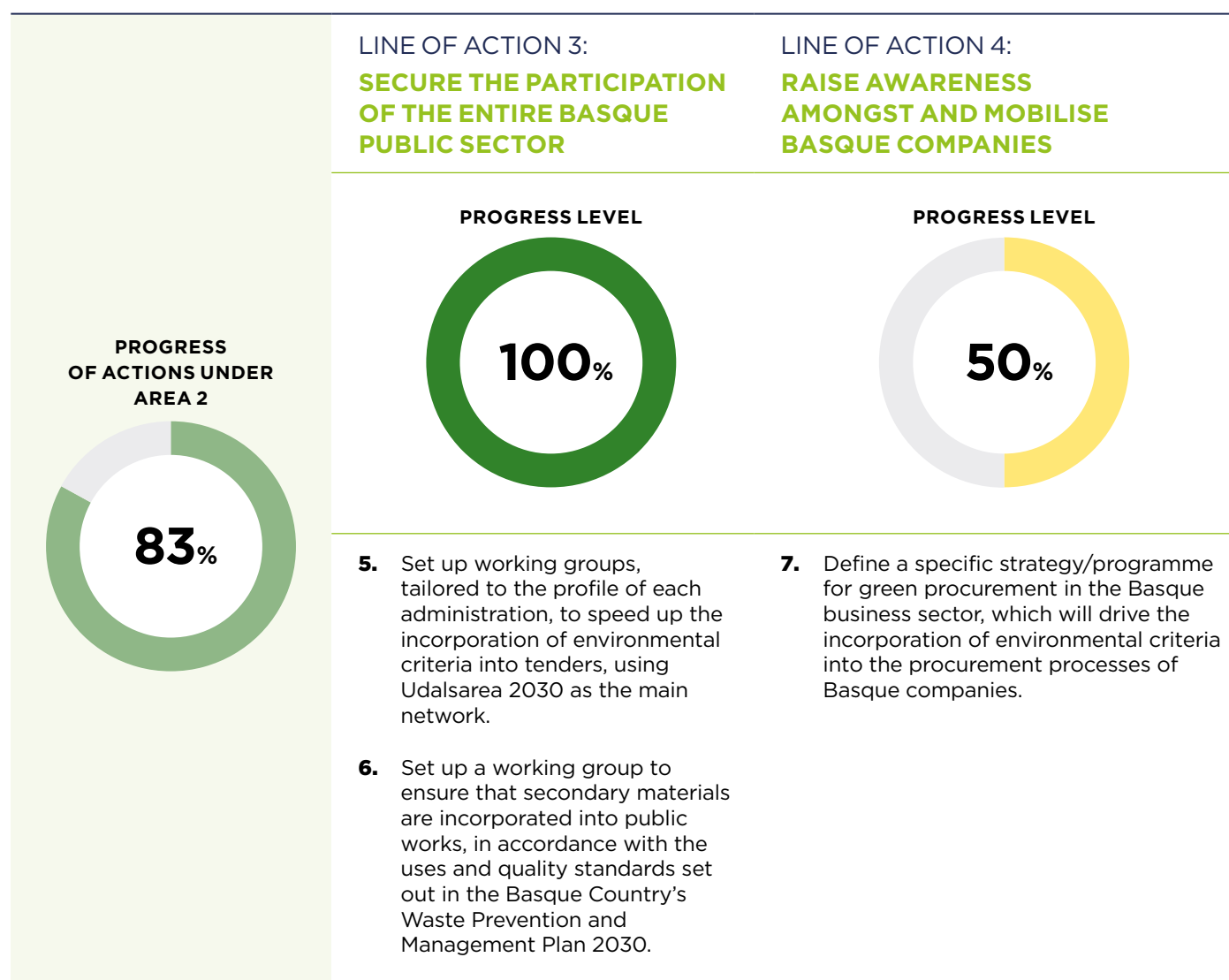
These documents make it possible to integrate specific, verifiable environmental criteria into the public procurement specifications for lighting installations.

AREA 2: MAKING PROGRESS ON COMMITMENTS TO GREEN PROCUREMENT IN THE BASQUE PUBLIC AND PRIVATE SECTORS

The aim of this area is to expand and consolidate participation in the Programme, both across the Basque public sector as a whole and within the business community, by strengthening institutional commitment and the gradual involvement of the market.

Green public procurement requires a broad base of committed entities to systematically integrate environmental criteria into their procedures. To this end, the Programme encourages public administrations and bodies to join, by promoting a common framework for action and fostering consistency across the region. At the same time, it aims to mobilise the Basque business sector, by encouraging its participation in the development of sustainable solutions and its positioning in a market that is becoming increasingly demanding in environmental terms.

AREA 2. MAKE PROGRESS IN THE COMMITMENT TO GREEN PROCUREMENT IN THE BASQUE PUBLIC AND PRIVATE SECTORS

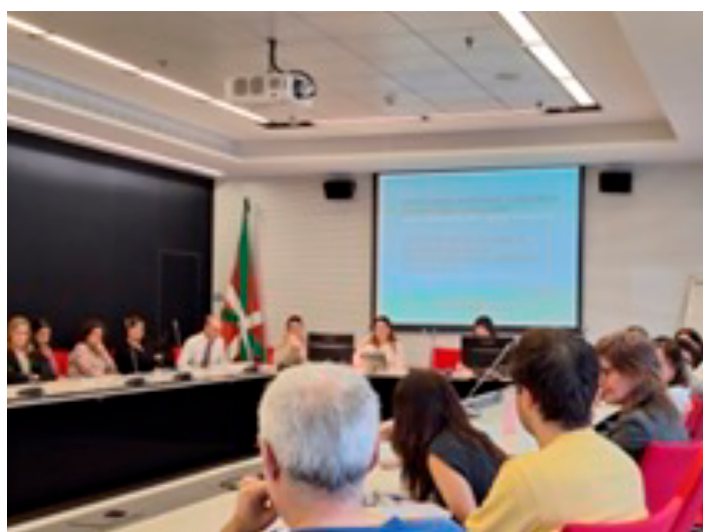


By the end of 2025, Area 2 will have made **overall progress of 83%**. Progress across the two lines of action has been uneven: Line 3 has achieved **100%** compliance, reflecting full roll-out during the period analysed, while Line 4 has shown more limited progress of **50%**.

The main tool deployed under Line 3 was the creation of **working groups aimed at different groups in the Basque public sector**, devised as spaces for exchanging knowledge and learning about specific challenges in the practical application of green procurement. These groups have made it possible to share important developments, analyse real-life procurement cases, identify best practices and barriers to the application of environmental criteria, and compare tools and criteria for green public procurement.

Five working groups were set up between 2022 and 2025, aimed respectively at various **departments of the Basque Government, the entities participating in the programme, local authorities** (through the Udalsarea 2030 network), the **specific area of civil works and building construction**, and the group looking at **nature-based solutions (NBS)**. Taken together, these groups have brought together dozens of public bodies across the region, including departments of the Basque Government, public bodies, universities, local councils, associations of local authorities and development agencies. Some of these are described below:

→ THE BASQUE GOVERNMENT'S WORKING GROUP: HARNESSING THE POTENTIAL OF EDUCATION



The Basque Government's working group, made up of 10 departments of the Basque Government, was set up with the aim of **facilitating the practical implementation of green public procurement across the various departments of the regional administration**. This group was the main vehicle for implementing Directive 1/2023, of 7 March 2023.

The group was set up in 2022 and has continued its work in recent years through operational meetings focused on monitoring the programme, answering questions, implementing the Directive and analysing practical procurement case studies.





WORKING GROUP MADE UP OF DEPARTMENTS OF THE BASQUE GOVERNMENT

#EUSKADIBERRIA



THE BASQUE GOVERNMENT'S INTER-DEPARTMENTAL WORKING GROUP WAS SET UP IN 2022 AS A TECHNICAL BODY TO PROMOTE THE INCORPORATION OF ENVIRONMENTAL CRITERIA INTO THE REGIONAL GOVERNMENT'S PUBLIC PROCUREMENT PROCESSES.

Meetings of the working group and participants:

- Since it was set up, four work meetings have been held: two in 2022 and two in 2024.
- The meetings were attended by 34 people from 10 departments of the Basque Government.

Key topics discussed and findings of the working group:

The group's meetings focused on facilitating the implementation of the Directive on incorporating environmental clauses into procurement procedures, and on analysing the extent to which green public procurement has been incorporated into various departments.

The working group helped identify practical difficulties in incorporating environmental criteria into specifications (linking these to the purpose of the contract, means of verification, and monitoring during implementation) and introduced support tools such as the service for making specifications and the programme's technical materials greener. It also helped identify the training needs and need for technical support of the various departments.

→ WORKING GROUP OF MEMBER ENTITIES: IDENTIFYING OPPORTUNITIES AND NEEDS



The working group of member entities was set up with the aim of **facilitating the exchange of experiences and providing technical support to the public bodies involved in the Basque Country's Green Public Procurement Programme 2030**. Every year or so since 2022, this working group has provided an opportunity to share progress on green public procurement, discuss the programme itself, and share best practices to facilitate the practical implementation of green procurement.

This group also played a decisive role in improving the Programme's services by identifying opportunities and common needs for technical support among member organisations.

→ LOCAL ENTITIES WORKING GROUP: A ROADMAP FOR DRIVING GREEN PUBLIC PROCUREMENT AT A LOCAL LEVEL



A dedicated working group made up of local entities was set up in 2023 as part of Udal-sarea 2030, the Basque Network of Sustainable Municipalities, with the aim of making it easier to identify the steps required to systematically **introduce green public procurement at a municipal level.**

This working group **brought together 23 local councils and regional entities interested in making their procurement processes greener.**

Over the course of four meetings, the group discussed the main barriers faced by local authorities in incorporating environmental criteria into tendering processes, along with possible solutions. As a result, 13 entities **drew up their own roadmaps to drive green procurement in their own organisations, and support materials were developed to make it easier to implement them.**

→ BUILDING CONSTRUCTION AND CIVIL WORKS WORKING GROUPS: A MAJOR CATEGORY

Public works and building construction is one of the sectors with the greatest potential for integrating circular economy criteria and reducing environmental impacts through public procurement.

A **dedicated working group focusing on green public procurement in building construction and public works** was set up in 2022 with the aim of making progress in this area. This working group, made up of public administrations and entities with experience in procurement for public works, was set up to act as a driver for developing tools to facilitate the use of secondary raw materials through green public procurement.

This priority is in line with the Basque Country's Waste Prevention and Management Plan 2030 and the provisions of Law 10/2021 on Environmental Administration in the Basque Country.

The working group has also been used as a place for analysing new trends and tools related to sustainability in the construction sector, such as life-cycle analysis, the carbon footprint of buildings, the circularity of materials, and the integration of environmental criteria into design and construction processes.



STEERING COMMITTEE FOR BUILDING CONSTRUCTION AND PUBLIC WORKS



THE WORKING GROUP ON BUILDING CONSTRUCTION AND PUBLIC WORKS WAS SET UP IN 2022 AS A TECHNICAL BODY TO PROMOTE THE INCORPORATION OF ENVIRONMENTAL CRITERIA INTO PROCUREMENT FOR PUBLIC WORKS, PARTICULARLY IN RELATION TO THE CIRCULAR ECONOMY AND THE USE OF RECYCLED MATERIALS IN CONSTRUCTION.

Meetings of the working group and participants:

- In total, the group has held four work sessions since it was formed.
- More than 10 public entities involved in the programme took part.

Key topics covered and findings:

The working group's meetings have focused on developing technical tools to make it easier to apply circular economy criteria in public procurement, both to comply with the legal framework (Article 84.3 of Law 10/2021 on Environmental Administration in the Basque Country) and go beyond it. This approach has involved both incorporating the requirements into tender specifications and monitoring them subsequently when executing the contract.

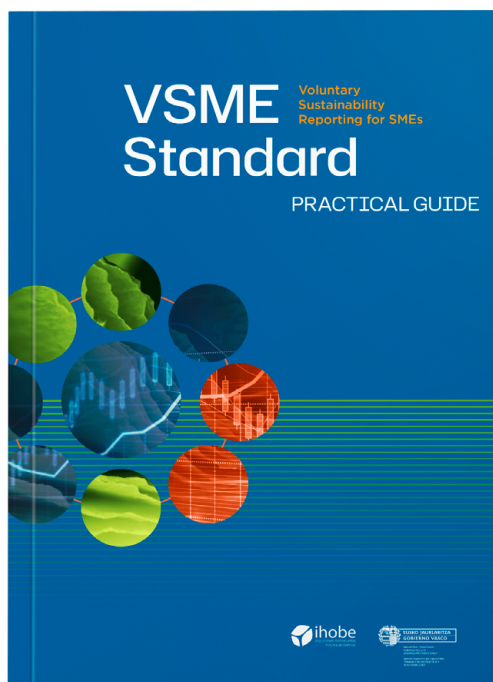
This working group has also been used to identify best practices, draw up guidelines for including secondary materials in public works contracts, and share news and trends such as carbon footprint analyses for buildings and proposals for new environmental criteria linked to nature-based solutions that can be applied to building construction and urban development contracts.

In addition to the steering committee, a **task force** was set up for the building construction and public works categories, made up of other entities interested in **keeping abreast of developments regarding the integration of green procurement criteria into their building construction and public works contracts.**

→ THE PRIVATE SECTOR AS A DRIVER OF SUSTAINABILITY IN ITS VALUE CHAINS

During the 2021–2025 period, work was also carried out with the private sector in its role as a buyer, through Ihobe's initiatives with companies such as the **Basque Ecodesign Center**, the public-private partnership between the Basque Government and 19 leading Basque companies with regard to sustainability aimed at creating knowledge and driving the value chain, and **Pyme Circular Euskadi**, the public-private partnership between the Basque Government and intermediary organisations for the roll-out of the circular economy applied to SMEs.

An initial **pilot project to identify priority categories in which to include environmental criteria in procurement and contracts** was carried out in 2021 within the framework of the Basque Ecodesign Center, with the participation of 8 partner companies. This was the seed that subsequently gave rise to a number of specific projects in which companies worked on developing specific criteria and tools to carry out an environmental assessment of products, linked to tender evaluation criteria. Companies in the electricity sector affiliated with the Basque Ecodesign Centre, including both utilities and their supply chain, were particularly active in this area. Between 2022 and 2025, they jointly developed life-cycle-



based tools for priority products in the electricity generation and transmission sectors, such as transformer substations, relays, meters and supports, with the aim of making the inclusion of environmental criteria in the procurement of these products standard practice in the near future.

Similarly, a project was carried out between 2021 and 2022 through Pyme Circular Euskadi, led by ACLIMA, the Basque Environment Cluster, with the aim **of developing a simple methodology for implementing green private procurement** tailored to each of the participating SMEs. This project is described in more detail in section 4.

Finally, the **BasquESG transformative project** was launched in 2025, as part of the Basque Country's Industry Plan 2030. The aim of this project is to create a **proprietary sustainability reporting and assessment system, tailored to the circumstances of Basque SMEs, based on the European Voluntary Sustainability Reporting Standard for Non-listed SMEs (VSME)**. The project is led by large Basque companies and financial institutions, such as Kutxabank, Laboral Kutxa, Iberdrola, Petronor, ITP Aero, Ingeteam, CAF, Mercedes Benz and Sidenor, which plan to use this system to improve the sustainability of their procurement processes, among other things.



BasqueESG TRANSFORMATIVE PROJECT



BasqueESG IS AN INITIATIVE OF THE BASQUE GOVERNMENT, FRAMED WITHIN THE INDUSTRY PLAN 2030, WHICH PROMOTES THE COMPETITIVENESS AND SUSTAINABILITY OF INDUSTRIAL SMES THROUGH THE USE OF THE VSME STANDARD.

The aim of this project is to develop a sustainability assessment system for Basque SMEs to enable them to respond effectively to the growing demands of their stakeholders in terms of ESG criteria.

The system is in line with European regulations and initiatives (in particular the VSME) and is aimed not only at ensuring technical compliance, but also at improving the competitive positioning of SMEs at regional and international level, thereby helping to enhance their reputation, attract sustainable investment, facilitate informed decisions and generate sustainable value for companies.

The European Voluntary Sustainability Reporting Standard for SMEs (VSME) was published by EFRAG in December 2024, with the aim of simplifying sustainability reporting for non-listed SMEs. By standardising their environmental, social and governance data, SMEs are better placed to act as suppliers to large industry-leading companies and can access bank finance more easily.

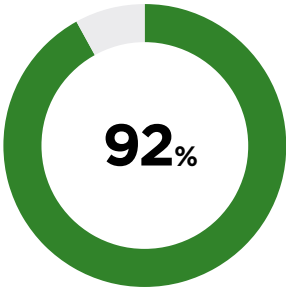
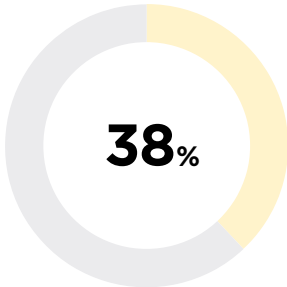
The project is divided into two phases:

- Pilot Project (January – June 2026): A pilot phase has been launched for 50 selected SMEs, which are receiving expert advice and free training from Euskalit.
- General Roll-out (2nd half of 2026): After the pilot, the aim is to roll out the system to the rest of the Basque industrial sector, with a target of reaching 500 SMEs by 2026.

**AREA 3: MAKING GREEN PROCUREMENT
A STRUCTURAL, INNOVATIVE FEATURE IN
ORGANISATIONS**

The aim of this area is to integrate green public procurement into the day-to-day management of organisations, moving beyond ad hoc approaches towards systematic and strategic implementation. To this end, the Programme looks to develop technical resources and support tools and mechanisms to make it easier to implement environmental criteria effectively in procurement processes. Furthermore, efforts are being made to professionalise the procurement function, by promoting training for the staff involved and strengthening all technical and strategic aspects.

**AREA 3.
MAKE GREEN PROCUREMENT A STRUCTURAL, INNOVATIVE FEATURE IN ORGANISATIONS**

PROGRESS OF ACTIONS UNDER AREA 3	LINE OF ACTION 5: PROVIDE RESOURCES FOR SYSTEMATIC AND STRATEGIC IMPLEMENTATION	LINE OF ACTION 6: PROFESSIONALISE THE ROLE OF PROCUREMENT AMONG ALL OF THE PERSONNEL INVOLVED
	PROGRESS LEVEL	PROGRESS LEVEL
	 92% 8. Strengthen the personalised support or advice service for making tenders greener. 9. Develop and/or adapt technical tools and resources for green procurement. 10. Launch pilot initiatives in underdeveloped areas of green procurement, focusing on priority areas such as life-cycle costs and the procurement of innovation.	 38% 11. Set up a regular training programme on green public procurement for the Basque public sector, among others, through the Basque Institute of Public Administration (IVAP). 12. Develop material for induction manuals for new staff, explaining their strategic role and the obligation to take environmental criteria into account in their actions.

By the end of 2025, Area 3 will have made **overall progress of 70%**. Progress on the two lines has been uneven: Line 5 shows a very high completion rate of **92%**, with the planned works almost fully completed, while Line 6 has made more modest progress of **38%**.

Various initiatives aimed at **making it easier to put green public procurement into practice in Basque public administrations** were launched during the period analysed. Below is a description of the **main milestones** achieved, combining direct technical support to public authorities, the development of technical tools and resources for green public procurement, and training activities aimed at public sector staff involved in procurement processes.

→ **ADVICE SERVICE ON HOW TO MAKE PROCUREMENT GREENER: 126 TENDERS MADE GREENER AND 145 TECHNICAL ENQUIRIES RESOLVED**

One of the most important tools has been the **technical advice service for making tendering procedures greener**, which provides direct support to public administrations on incorporating environmental criteria into tender specifications and on resolving technical enquiries.



SERVICE TO MAKE TENDER SPECIFICATIONS GREENER AND PROVIDE TECHNICAL ADVICE

THE BASQUE COUNTRY'S GREEN PUBLIC PROCUREMENT PROGRAMME PROVIDES A SPECIALIST TECHNICAL SUPPORT SERVICE TO HELP INCORPORATE ENVIRONMENTAL CRITERIA INTO PUBLIC PROCUREMENT PROCEDURES.

Type of support provided:

The service provides support to public administrations at various stages of the procurement process, including:

- Incorporation of environmental criteria into procurement specifications
- Guidance on the criteria for awarding contracts and special conditions for contract performance
- Advice on means of accreditation and verification of environmental requirements
- Answering technical enquiries regarding specific procurement categories

Activity of the service:

During the period analysed, the service provided extensive support to public administrations:

- 122 public authorities assisted
- 126 tenders made greener
- 145 technical enquiries resolved

Therefore, this service has helped make green public procurement easier to implement in practice, strengthening the technical ability of public administrations to integrate environmental criteria into their procurement processes.

In 2025, **an AI-based pilot tool was developed to make it easier to make specifications greener**, with the aim of improving the cost-effectiveness of this service. This tool was developed as part of the Basque Government's BIND GOV TECH programme to carry out demonstration projects. The result was satisfactory. Although it is currently being used internally by the technical advice service team to make the system greener, in the medium term it could lay the foundations for more powerful AI tools to be made available to member entities.

→ FACILITATING THE PRACTICAL IMPLEMENTATION OF GREEN PROCUREMENT: DEVELOPING TECHNICAL TOOLS AND RESOURCES



The development of technical tools and resources should make it easier to use environmental criteria in both public and private procurement. One particularly prolific area has been the construction sector. A **separate document** was drafted on this subject, **setting out detailed guidelines for drafting a Waste Management Study and a Waste Management Plan for projects and public works**. This document has been included as a separate section in the “*Manual for Drafting and Implementing a Construction and Demolition Waste Management Plan. Best Practices*”, originally published by Ihobe in 2019, making it easier to include measures in procurement specifications that go beyond regulatory requirements.

In 2024, following the passing of Law 1/2024 on Energy Transition and Climate Change, adaptation to climate change emerged as a new priority for the Basque Country.

The programme can be flexible in how it adapts, creating knowledge and tools for incorporating nature-based solutions (NBS) into public procurement processes, drawing on the European LIFE Urban Klima 2050 project, which promotes the incorporation of nature-based solutions into urban and spatial planning as a strategy for achieving greater resilience to climate change.

To this end, a monograph was first produced in 2025 on nature-based solutions and their potential for inclusion in public tenders. Based on the above, a proposal was put forward to include NBS in green public procurement criteria for the categories of building construction, urban development, landscaping, and civil and hydraulic works. The inclusion of NBS-related environmental clauses broadens the scope of these criteria, thereby improving adaptation to climate change. This proposal was discussed during two consultation sessions with public and private stakeholders in order to draw up the final criteria, which will be published in 2026.

Given its innovative nature, it is worth noting the fact that a pilot project took place in 2021 and 2022 to incorporate life-cycle costing as a criterion for awarding contracts, in which several entities took part, such as the Gipuzkoa Provincial Procurement Centre and EITB. A simplified life-cycle cost analysis tool was developed to make it easier to assess the criteria for awarding contracts, which was used when both organisations integrated this concept into their procurement specifications for IT equipment.

Another important tool, in this case a multi-sectoral one that can be applied to both the public and private sectors, is the **Climate & Circularity Calculator**. This calculator was developed by Ihobe, based on the knowledge created at the Basque Ecodesign Centre. It is a web-based tool that allows companies **to calculate their environmental and carbon footprints** at an organisational (Areas 1, 2 and 3) and product level.



CLIMATE & CIRCULARITY CALCULATOR



CLIMATE &
CIRCULARITY
CALCULATOR
by ihobe

THE CLIMATE & CIRCULARITY CALCULATOR IS A FREE ONLINE TOOL FOR CARRYING OUT A SIMPLIFIED ASSESSMENT OF THE ENVIRONMENTAL PERFORMANCE OF ORGANISATIONS, PRODUCTS AND SERVICES, USING A LIFE-CYCLE APPROACH.

It makes it possible to calculate the carbon and environmental footprints of organisations, products and services using an integrated approach. It is also possible to calculate circular economy indicators using an organisational approach, all in accordance with recognised standards.

From an organisational perspective, it makes it possible to calculate the corporate environmental footprint, in accordance with the methodology published by Ihobe, the Scope 3 carbon footprint in accordance with the UNE-EN ISO 14064-1:2019 standard, and a selection of circular economy indicators based on the “*Circular Transition Indicators 3.0*” methodology, which is compatible with the ISO 59020 standard.

Using a product-based approach, the tool makes it possible to carry out life cycle analyses of products and services (in line with ISO 14040 and ISO 14044), and calculate carbon footprints in accordance with ISO 14067:2018.

The integrated approach makes it possible to take advantage of the synergies between the need for data to calculate different footprints, optimising the effort involved in gathering information.

This tool will make it easier for Basque companies to calculate the carbon footprint of their products, which will be a future requirement under Law 1/2024 on Energy Transition and Climate Change in public procurement, and to calculate their organisation’s carbon footprint for registration in the Basque Register of Energy Transition and Climate Change Initiatives.

Similarly, it can be used to improve the environmental performance of organisations, products and services.

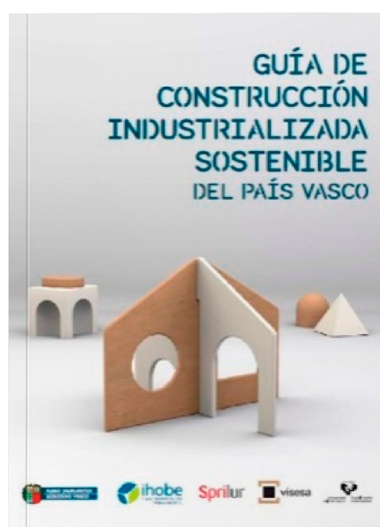


→ TRAINING FOR PUBLIC SECTOR STAFF ON INCORPORATING ENVIRONMENTAL CRITERIA INTO PROCUREMENT

The Programme's lines of action include training and capacity-building initiatives aimed at public administration staff, with the aim of making it easier to effectively incorporate environmental criteria into public procurement processes. These activities combine technical seminars and practical workshops, and specialised courses geared towards strengthening technical knowledge and making it easier to put green public procurement into practice.

One particularly successful example was the **technical seminar in 2023 on the obligations regarding green public procurement arising from Law 4/2019 on Energy Sustainability and Law 10/2021 on Environmental Management in the Basque Country**, which was attended by **61 people** and provided an opportunity to present practical examples of how to apply these obligations in public procurement processes.

Similarly, the **technical seminar in 2023 on common mistakes when introducing environmental criteria into public procurement**, attracted 90 people, including administrative teams from outside the Basque Country.



Following the same format, a technical seminar was organised on 16 December 2023 to present the **Basque Country's Guide to Sustainable Industrialised Construction**. This publication was geared towards helping public and private developers make informed decisions on the suitability of adopting industrialised construction solutions from a sustainability perspective, and incorporating this perspective into their tender documents.

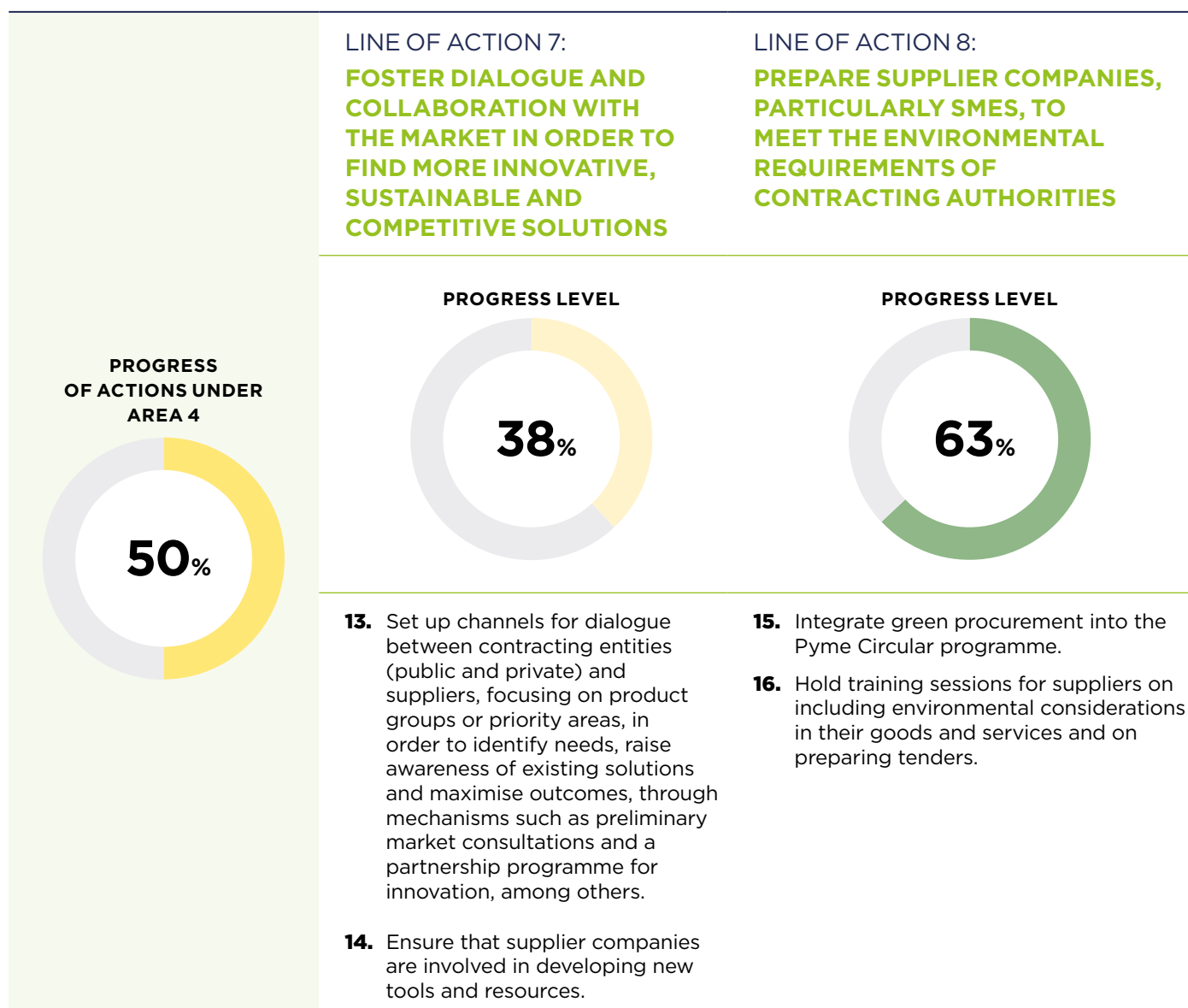
In 2025, a pilot project was carried out in the form of a practical capacity-building workshop, in response to a request from the Basque Government's Department of Security. Consequently, an ad hoc workshop was held in **2025**, attended by 30 people, which focused on how to incorporate environmental criteria into tenders using actual specifications from the department and concentrating on the categories of products to be procured that same year. The experiment was a success.

Finally, it is worth noting that a specific course on green public procurement was put together by the Basque Institute of Public Administration (IVAP) in 2025, and will be available in 2026.

AREA 4: HAVING A SUITABLE, HIGH-QUALITY MARKET THAT IS READY

This area focuses on the market dimension of green public procurement, recognising that its effectiveness depends on the availability of a supply that is capable of meeting new environmental requirements. The Programme promotes dialogue with the market and collaboration with suppliers, with the aim of making it easier to gradually adapt the supply to criteria of sustainability, circularity and low carbon intensity. Moreover, measures are being taken to prepare suppliers, particularly SMEs, to compete in a public procurement environment that is more demanding from an environmental perspective.

AREA 4. HAVING A SUITABLE, HIGH-QUALITY MARKET THAT IS READY



By the end of 2025, Area 4 had made **overall progress of 50%**, with varying levels of progress across its two lines: **38%** for Line 7 and **63%** for Line 8.

This area is aimed at **strengthening relationships between the public sector and the market**, with the aim of making it easier for suppliers, particularly SMEs, to meet the new environmental requirements incorporated into public procurement processes. The Programme has encouraged dialogue with the business community through various initiatives, pushed for the incorporation of environmental criteria into value chains, and strengthened the technical capabilities needed for companies to adapt to the new demands of the public market. The main **milestones and developments** during the period are described below:

➔ **TECHNICAL COMPARISON AGAINST THE MARKET: A SYSTEM THAT BENEFITS BOTH THE PUBLIC AND PRIVATE SECTORS**

Carrying out technical comparisons against the market makes it possible to **incorporate a business perspective into the design of environmental tools and criteria for green public procurement, thereby reducing the risk of unsuccessful tenders and acting as a driver of competitiveness**. These areas make it easier for the environmental requirements set by the administration to take account of the technical and economic realities of the sectors concerned.

All green public procurement criteria in this Programme have been compared against the market. Recent examples include **comparisons with stakeholders in the lighting sector** in relation to the criteria for street lighting in 2024, and **technical comparisons regarding the inclusion of nature-based solutions (NBS)** in landscaping, urban development, building construction, building envelopes, civil works and hydraulic works. In the latter case, a number of comparison sessions were organised involving two working groups: the Civil Works Steering Committee and the Group of Experts on Nature-Based Solutions (NBS), which was set up as part of the Life Urban Klima project. These were used to gather the opinions of public administrations, research centres, engineering firms and entities specialising in nature-based solutions.

➔ **PYME CIRCULAR EUSKADI (A CIRCULAR ECONOMY AID PROGRAMME FOR SMES IN THE BASQUE COUNTRY): DEVELOPING TOOLS TO IMPROVE THE PREPAREDNESS OF THE PRIVATE SECTOR**

Another line of action under the programme is aimed at spreading the principles of green procurement to the business sector, by encouraging companies to integrate environmental criteria into their own procurement processes and the management of their supply chains.

In this regard, **the PYME Circular Euskadi aid programme** has incorporated green procurement as one of the potential environmental drivers of the projects it funds. In particular, the line of aid regards the sustainability of value chains as one of the types of projects eligible for funding, thereby making it possible to support initiatives geared towards introducing environmental criteria into companies' procurement processes. However, this programme also makes it possible to develop tools and build capacity within SMEs to meet both public and private sector market requirements.

Between 2021 and 2025, the programme funded three projects in line with the principles of both public and private procurement:

- **ICOPVE Project: promoting green private procurement in the Basque Country**
- **INGURULABEL Project**
- **AR-CAV-EPD Project**



THE AIM OF THE ICOPVE PROJECT (PROMOTING GREEN PUBLIC PROCUREMENT IN THE BASQUE COUNTRY), WHICH IS LED BY ACLIMA-BASQUE ENVIRONMENT CLUSTER AND FUNDED THROUGH THE PYME CIRCULAR 2021 PROGRAMME MANAGED BY IHOBE, IS TO PROMOTE THE INCORPORATION OF ENVIRONMENTAL CRITERIA INTO COMPANIES' PROCUREMENT PROCESSES.

The project is based on the premise that green procurement is a key tool for driving the transition towards a circular economy, as it makes it possible to transform supply chains by incorporating environmental criteria into the selection of suppliers and products.

Its main objectives include:

- Developing a simple methodology for implementing green private procurement in SMEs,
- Improving the environmental performance of participating companies,
- Improving their competitive position in the market.

As part of the project, participating companies draw up an inventory of inputs and outputs in their production process, identify their main suppliers and apply an environmental assessment methodology for suppliers based on the European Commission's green public procurement criteria.

The project also includes collaborative working dynamics between participating companies, aimed at sharing experiences, identifying opportunities for improvement and finding new solutions for integrating environmental criteria into their procurement processes.

The aim of the INGURULABEL project, led by the Basque Food Cluster, is to respond to a demand in its value chain. The objective is to assess and report on the environmental performance of the Basque food industry by calculating the environmental footprint of products, developing plans for environmental improvement, and defining reporting and differentiation strategies.

Similarly, the AR-CAV-EPD project, spearheaded by the Association of Construction and Demolition Waste Recycling Plants of the Basque Country, together with ACLIMA, has developed the first sector-specific Environmental Product Declaration (EPD) for recycled aggregates from construction and demolition waste in the Basque Country, in accordance with the EN 15804 European standard and the International EPD System®. This initiative makes it possible to assess and report the environmental impact of these materials in a transparent manner, thereby strengthening their market position and making it easier to use them in procurement processes that incorporate environmental criteria.

→ TRAINING PRIVATE SECTOR PROFESSIONALS TO MEET THE ENVIRONMENTAL REQUIREMENTS OF THEIR VALUE CHAINS

The **Circular Economy Training Programme for active professionals**, run by the Basque Circular Hub and managed by Ihobe, seeks to **improve the private sector's technical capabilities in the circular economy and related areas**.

The ultimate aim of this programme is to improve the competitiveness of companies, by preparing them **to meet the new environmental requirements of the public and private sectors**.



**CIRCULAR ECONOMY TRAINING PROGRAMME
FOR ACTIVE PROFESSIONALS**



BASQUE CIRCULAR HUB

TRAINING PROGRAMMES HAVE BEEN DEVELOPED FOR ACTIVE PROFESSIONALS AS PART OF THE COLLABORATION BETWEEN PYME CIRCULAR EUSKADI AND THE BASQUE CIRCULAR HUB, WITH THE AIM OF IMPROVING THE BUSINESS COMMUNITY'S CAPABILITIES IN THE AREAS OF SUSTAINABILITY AND ENVIRONMENTAL METRICS.

These free, in-person courses are geared towards supporting the competitiveness of companies by integrating environmental considerations into both business management and the development of products and services, in order to meet the needs of their public and private sector customers.

Since its launch **in 2022, 117 courses have been delivered, training more than 2,200 professionals** and involving more than a thousand companies.

These courses provide companies with the opportunity to keep abreast of the latest regulatory and market developments, which will help them identify risks and opportunities so that they can make informed decisions and improve their competitive position.

Some of the topics covered in the programme are set out below:

- **Carbon footprint, decarbonisation strategies and climate risks:** practical application of the organisational carbon footprint (Scopes 1, 2 and 3), climate risk assessment, and calculation of a product's carbon footprint to meet market requirements.
- **ESG: Transparency and environmental positioning:** frameworks and standards for measuring and reporting on aspects of ESG (environmental, social and governance), taking a closer look at the VSME standard for SMEs on reporting environmental information across the value chain.
- **Eco-design for a circular economy:** integration of eco-design and circularity into products and services, covering the circularity requirements of the new European framework, and UNE and ISO methodologies.
- **Raw materials and waste management:** implementation of sustainable practices with a focus on recyclable and secondary materials in the construction sector.

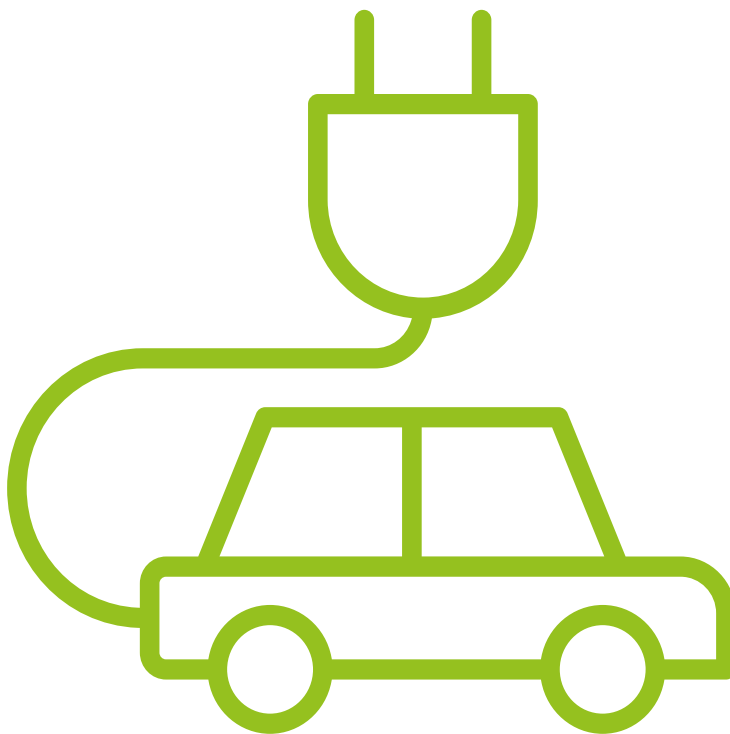
→ DEVELOPMENT AND IMPROVEMENT OF TECHNICAL TOOLS



Finally, the programme also promotes **the development and improvement of technical tools to support green public procurement**, which make it easier for both public administrations and companies to apply environmental criteria in procurement processes. Further progress was made in this regard during the period assessed, with the continued development of tools that make it possible to incorporate circularity and sustainability criteria into various areas of procurement.

In 2023, a **tool for calculating the use of secondary materials in public works** was published. It was designed to make it easier to comply with the requirements set out in Article 84.3 of the Law on Environmental Management, which stipulates that a minimum of 40% of materials used in public works must be secondary materials. During its development, this tool underwent a pilot scheme in the private sector and was compared against the public sector within the framework of the Civil Works Steering Committee.

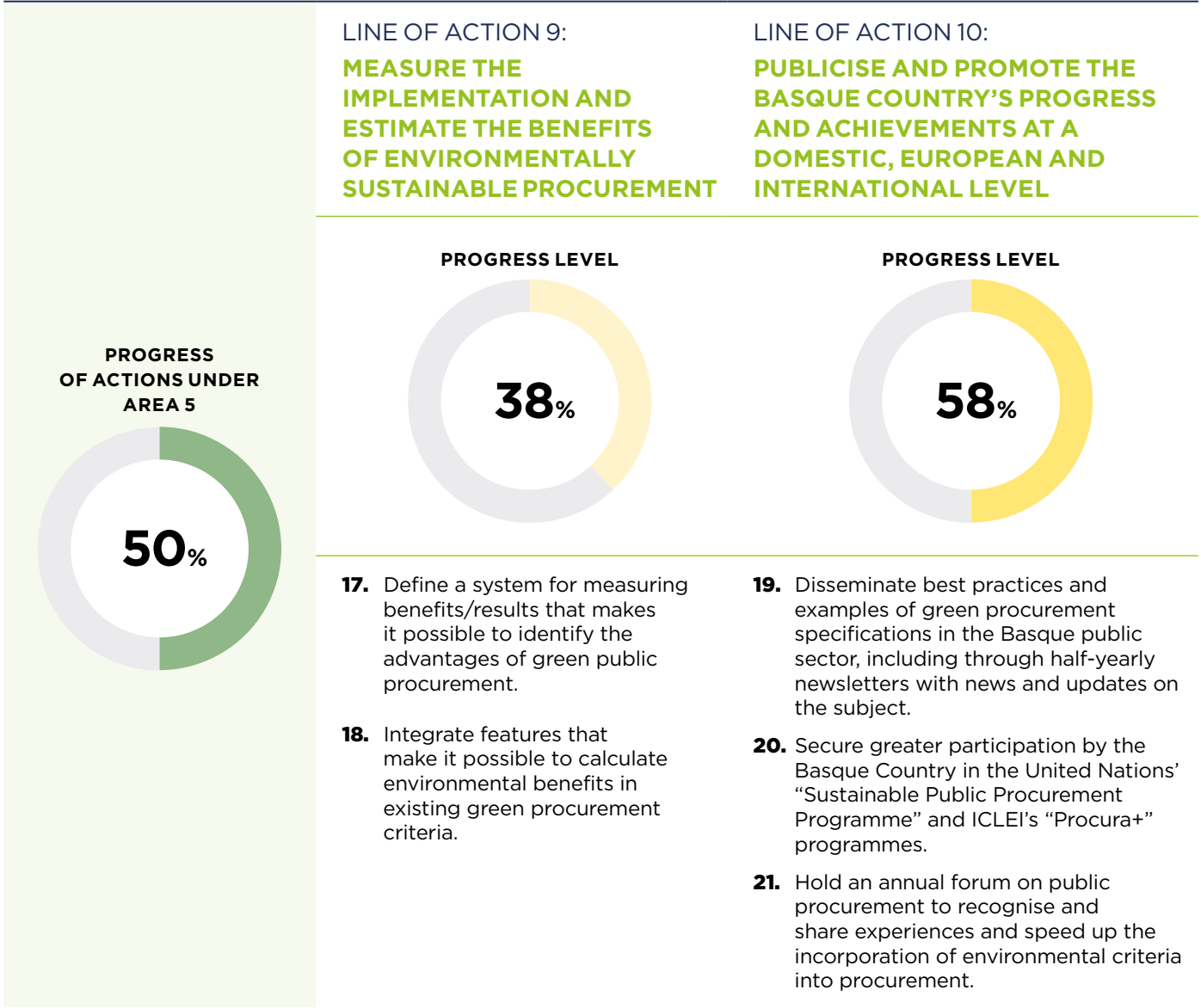
The tool comes with a guide on introducing secondary raw materials into civil works, setting out the range of opportunities for incorporating recycled materials into the various construction items. This guide also includes real-life case studies from the Basque Country.



AREA 5: HIGHLIGHTING THE PROGRESS, ACHIEVEMENTS AND BENEFITS OF GREEN PROCUREMENT

The aim of this area is to strengthen the Programme’s monitoring, measuring and reporting systems, so as to quantify the extent to which it has been implemented and highlight the results. Improvements to evaluation mechanisms make it possible to estimate the environmental and economic benefits of green public procurement, thereby facilitating evidence-based decision-making. At the same time, reporting on progress and results helps to build trust, strengthen institutional commitment and raise the Basque Country’s profile in this field.

AREA 5. HIGHLIGHTING THE PROGRESS, ACHIEVEMENTS AND BENEFITS OF GREEN PROCUREMENT



By the end of 2025, Area 5 had made **overall progress of 50%**, with varying levels of progress across its two lines: Line 10 had made **58%** progress, ahead of Line 9, which had only made **38%**.

During the period assessed, the establishment of green public procurement in the Basque Country was accompanied by a continuous effort to generate and transfer knowledge, aimed at supporting public administrations in incorporating environmental criteria into their procurement processes. These efforts sought to strengthen the administration's technical capabilities, facilitate access to up-to-date information and encourage the exchange of experiences between administrations and relevant public and private stakeholders. The main milestones and developments during the period are described below:

→ REPORTS TO KEEP EVERYONE UP TO DATE

During the period analysed, two types of report were produced to provide an overview of the state of green procurement both within and outside the Basque Country: reports on trends and the annual monitoring reports for the Programme.

Reports on trends in green public procurement allow member entities to keep abreast of the latest developments in this field, drawing on Ihobe's environmental monitoring system.

12 reports were produced between 2021 and 2025, which compile and provide summarised information on:

- Recent regulatory developments in Europe, Spain and the autonomous communities
- Initiatives launched in the Basque Country
- Experiences of other public administrations
- Tools and methodologies for sustainable procurement
- Relevant publications and guides on green public procurement.

The aim is to facilitate access to up-to-date information and help spread best practices, by demonstrating how the incorporation of environmental criteria into public procurement is gradually becoming established in various administrative contexts.



→ NETWORKING: SETTING AN EXAMPLE AND BRINGING NEW IDEAS TO THE BASQUE COUNTRY

The **Programme promotes networking, with the aim of sharing experiences and showcasing the Basque model in specialist forums**. Ihobe carries out this work in its capacity as the programme's technical secretariat, **regularly taking part in conferences and technical seminars**, where it presents updates on the programme, the tools developed and examples of how to use them in practice.

These activities make it possible to share the experience gained in the Basque Country, contribute to the technical debate on sustainable public procurement, and strengthen links with international initiatives and networks working in this field.

Nationally, Ihobe has shared the Basque Country's experience at various editions of the **International Congress on Green Public Procurement and Climate Change, organised by the Chair of Green Public Procurement at the University of Alcalá**, at a workshop organised in Valladolid to **develop guidelines for circular public procurement in Castile and León**, and at technical conferences on circular procurement and sustainability in public procurement, such as the SOMOS ASEPAU event organised by the Spanish Association of Universal Accessibility Professionals.

The Programme has also been showcased at international forums and in professional networks, including a meeting with the **Eurosystem Procurement Coordination Office**, where the Basque Country's experience in incorporating environmental criteria into public procurement was shared, and at the **World Bank, which is interested in applying the Climate & Circularity Calculator tool to green procurement** to calculate benefits.

However, the most important platform for bringing lessons learned to the Basque Country is undoubtedly the meetings of the **Procura+ European network, coordinated by ICLEI – Local Governments for Sustainability**, one of the main international forums for sharing experiences in the field of sustainable public procurement.



IHOBE'S PARTICIPATION IN THE PROCURA+ EUROPEAN NETWORK



THE PROCURA+ NETWORK, COORDINATED BY ICLEI – LOCAL GOVERNMENTS FOR SUSTAINABILITY, BRINGS TOGETHER PUBLIC ADMINISTRATIONS AND ORGANISATIONS FROM DIFFERENT COUNTRIES WITH THE AIM OF SHARING EXPERIENCES AND PROMOTING SUSTAINABLE PUBLIC PROCUREMENT.

- The Procura+ international seminar, held in the Netherlands, brought together more than 100 participants from four continents. The meeting provided an opportunity to share solutions to the main challenges faced by public administrations when incorporating environmental and social criteria into procurement processes, including a lack of technical training, difficulties in ensuring that environmental clauses are properly implemented, and the challenges associated with measuring environmental benefits.
- The Procura+ conference, held in Portugal, is one of Europe's leading events on sustainable public procurement. The progress made under the Basque Country's Green Public Procurement Programme 2030 was presented at this forum, along with the Directive for incorporating environmental clauses into public procurement processes in the Basque public sector.

Participation in these forums has made it possible to compare the tools and approaches developed in the Basque Country with other European initiatives, identify the best practices applicable to the Basque context, and strengthen the Basque Country's position as a leader in implementing green public procurement. All of the insights gained were subsequently shared via the Trend Reports.

→ PILOT SCHEMES TO ESTIMATE THE BENEFITS OF GREEN PUBLIC PROCUREMENT

A line of action where progress has been slower is the measurement of environmental benefits associated with green public procurement. As was evident at the Procura+ event in the Netherlands, this is a challenge faced by all public administrations across all regions.

The Basque Country rolled out a pilot project in 2023 aimed at **quantifying the potential impact of incorporating environmental criteria into procurement processes**, based on a comparison between the environmental impact over the life cycle of a product purchased based on environmental criteria and that of a standard product. This pilot project made it possible to estimate the differences in terms of greenhouse gas emissions and the consumption of primary raw materials using the Climate & Circularity Calculator (3Cs) tool.

The exercise made it possible to identify the environmental benefits linked to specific tenders, but given the wide variety of procurement categories and specific cases within each category, defining benchmark products and working with aggregated tenders proved to be a very complex task. In other words, the complexity meant that the methodology could not be scaled up to cover Basque public procurement in its entirety.

Nevertheless, the pilot project provided valuable lessons for exploring methods of measuring environmental impact that strike a better balance between the resources required and the results achieved.



05.

RESULTS OF THE ACTION PLAN

The Programme set strategic targets for the whole 2021–2030 period, with interim targets for 2025. The results achieved by the end of 2025 are set out below, compared to these interim targets and the targets for 2030. The overall picture is **largely positive**, although there are significant differences between some of the indicators.

SUMMARY OF OBJECTIVES AND RESULTS 2025	RESULT 2025	OBJECTIVE 2025	OBJECTIVE 2030
Number of public bodies participating in the Programme	40	75	150
Number of private entities participating in the Programme (purchasing entities)	2	20	50
Sustainable Development Goal: indicator 12.7.1 (out of 4.6 on procurement based on environmental criteria)	3.9	4.0	4.2
Percentage of green public procurement in the programme's priority categories (number of tenders)	57 %	55 %	75 %
Percentage of green public procurement in the programme's priority categories (financial value)	55 %	55 %	75 %
Percentage of green public procurement out of total procurement (number of tenders)	52 %	40 %	60 %
Percentage of green public procurement out of total procurement (financial value)	44 %	40 %	60 %

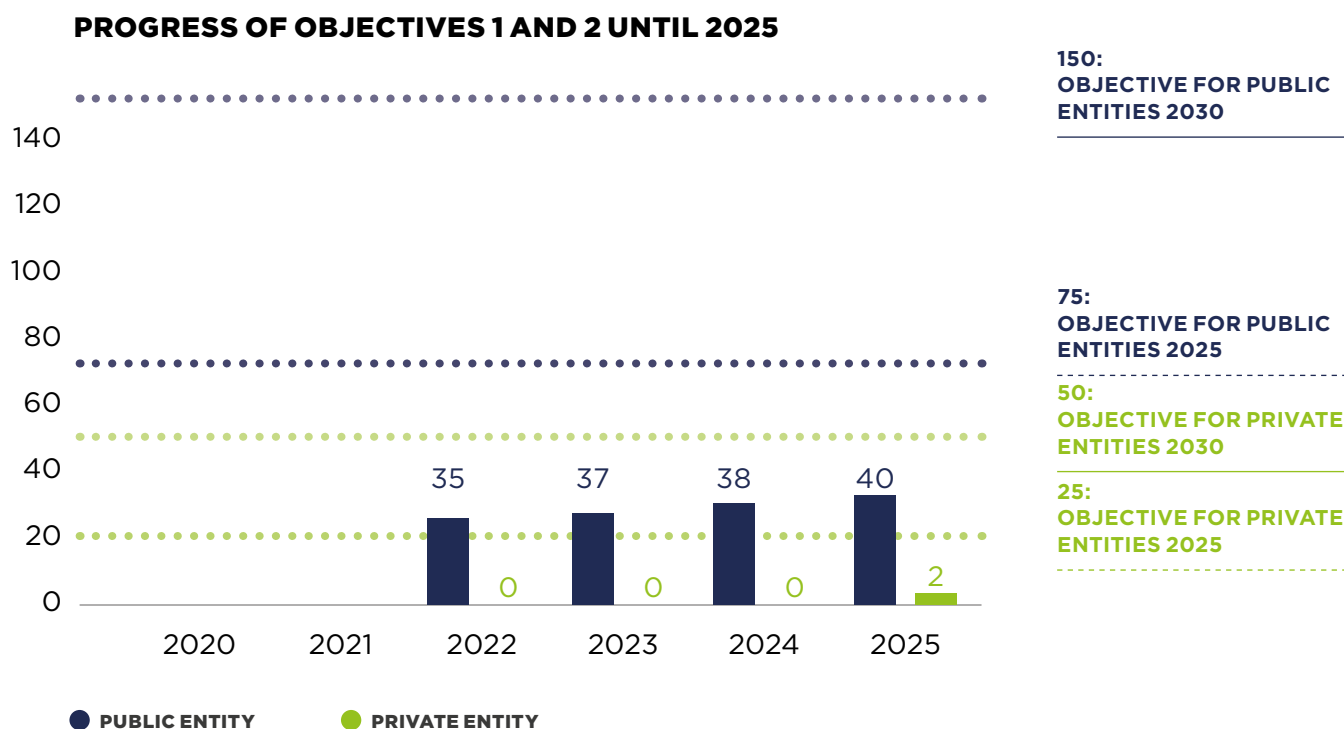
The results show that green public procurement has been widely implemented in contractual practice. The proportion of green procurement in the priority categories stands at **57%** in terms of the number of tenders and **55%** in terms of financial value, thereby achieving or exceeding the interim target set for 2025. The results have also exceeded the targets set across the procurement process as a whole: green procurement accounts for **52%** of tenders and **44%** of the total value, exceeding the target of 40% set for that year. Similarly, the SDG 12.7.1 indicator scored **3.9**, which is very close to the target of 4.0.

However, the results showed a significant shortfall in institutional participation: the number of public entities participating stood at **40**, compared with the target of 75, and only **2** private entities had joined, against a target of 20. Broadening the Programme's institutional base, particularly to include the private sector, is one of the key areas for improvement in the upcoming period.

The trends in the results for each indicator over the period 2021-2025 are detailed below.

OBJECTIVES 1 AND 2: INSTITUTIONAL SCOPE OF THE PROGRAMME

Strategic Objectives 1 and 2 of the Programme set out quantified participation targets for the public and private sectors, with the aim of progressively expanding the Programme's institutional base by 2030. The targets set for 2025 were for 75 public entities and 20 private entities to join the programme. At the end of 2025, the number of participating public entities stood at **40** (53% of the target) and the number of private entities at **2** (10% of the target).



OBJECTIVE 3: CONTRIBUTION TO SUSTAINABLE DEVELOPMENT GOAL 12.7.1

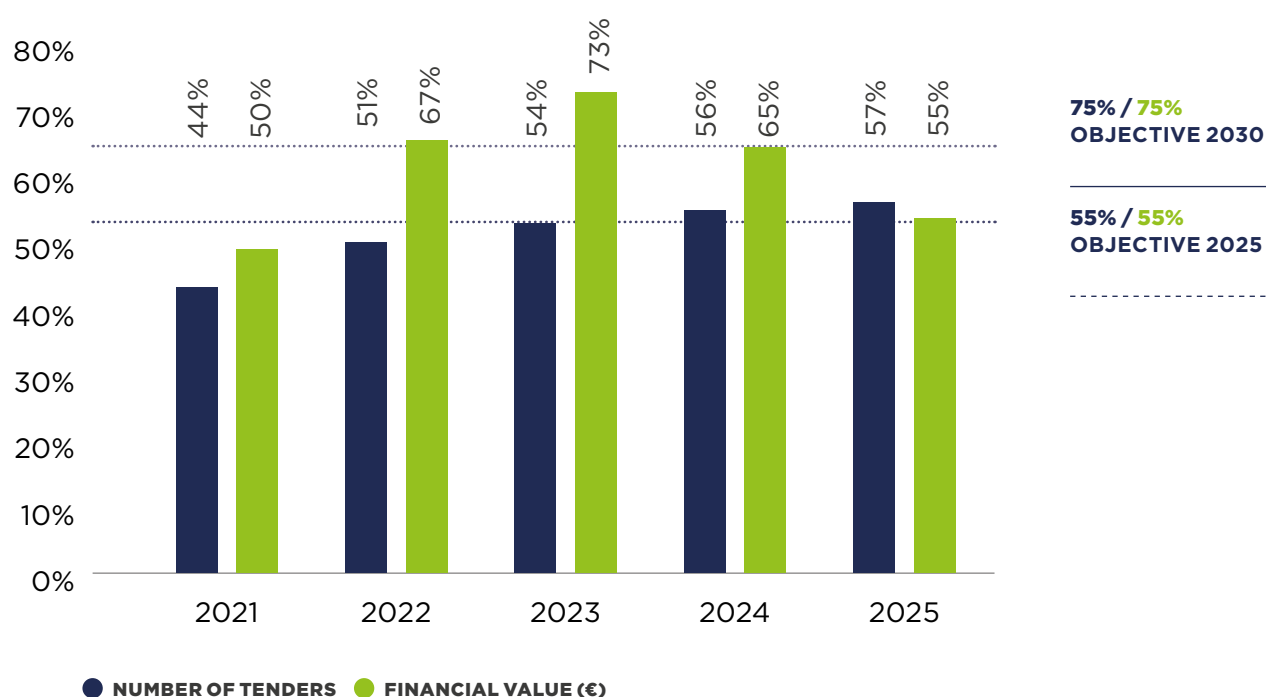
This indicator, which promotes sustainable public procurement practices aligned with national policies and priorities, measures the extent to which environmental criteria have been integrated into public procurement on a scale of 0 to 4.6. The target set was to reach **4.0** by 2025 and **4.2** by 2030. The value reached for 2025 was **3.9**, which is slightly below the interim target. The trend was positive between 2021 and 2023 (from 3.7 to 4.1), followed by a slight decline up to 2025.

PROGRESS OF OBJECTIVE 3	YEAR 2021	YEAR 2022	YEAR 2023	YEAR 2024	YEAR 2025	OBJECTIVE 2025	OBJECTIVE 2030
Sustainable Development Goal: Indicator 12. 7.1 (out of 4.6 on procurement based on environmental criteria)	3.7	4.0	4.1	4.0	3.9	4.0	4.2

OBJECTIVES 4 AND 5: IMPLEMENTATION IN PRIORITY CATEGORIES

Strategic Objectives 4 and 5 measure the percentage of green public procurement in the priority **categories of the Programme** — those types of goods, works and services that are most significant in terms of procurement volume and potential environmental impact — in terms of both the number of tenders and the financial value. Objective 4 measures the percentage, in terms of the number of tenders, that include environmental criteria over the total number of tenders in those categories, while Objective 5 measures the same percentage in terms of **the financial value** of the contracts awarded. The target set for both indicators was to reach **55%** by 2025, with a target of **75%** by 2030.

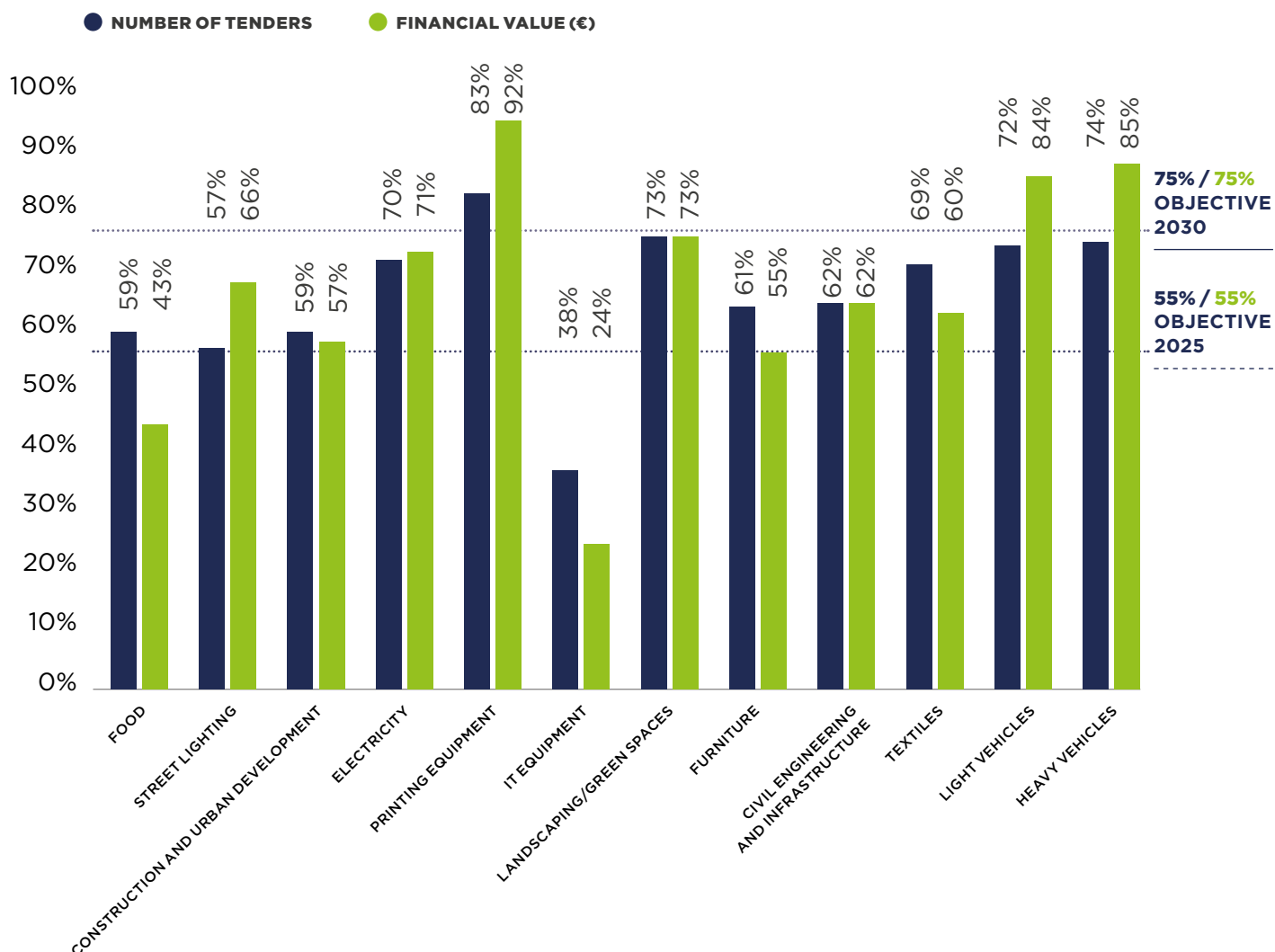
PROGRESS OF OBJECTIVES 4 AND 5



The results exceeded this threshold: **57%** in terms of the number of tenders and **55%** in terms of financial value.

The figure below also shows the results for objectives 4 and 5 in 2025, broken down by category type.

PROGRESS OF OBJECTIVES 4 AND 5 (BY PRIORITY CATEGORY)

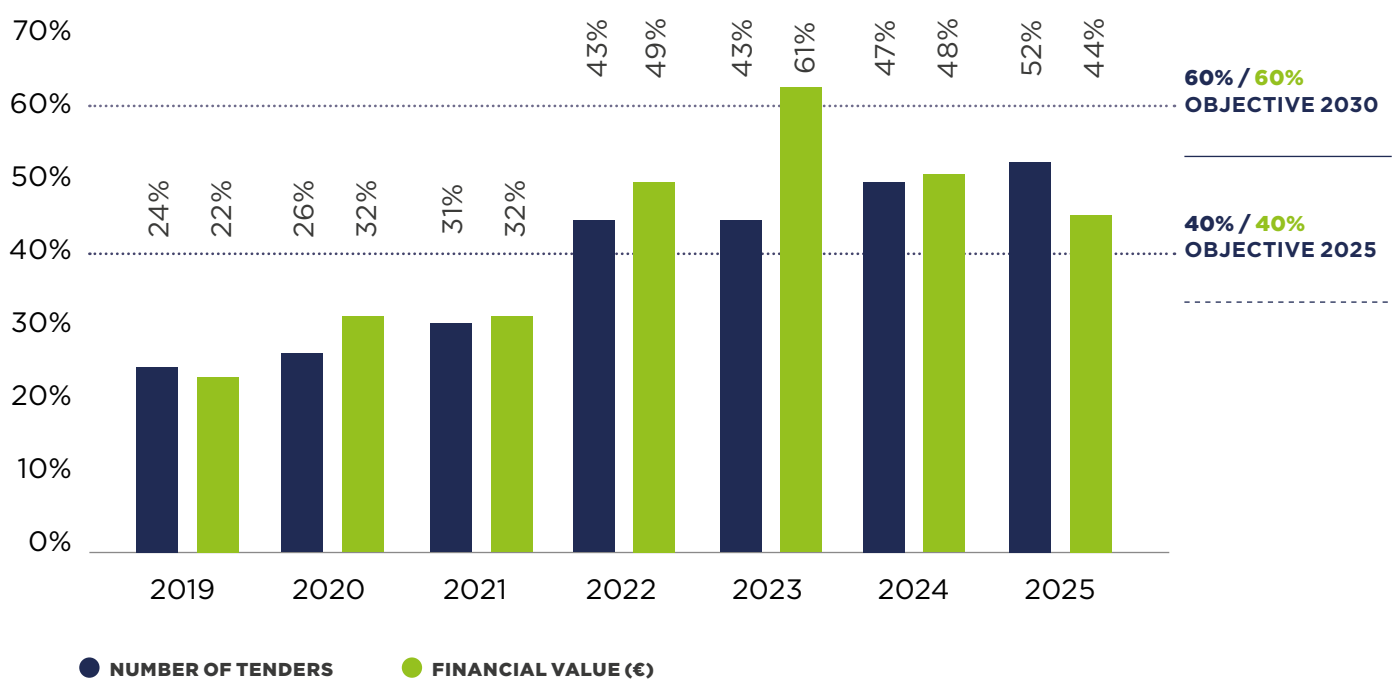


The target was achieved or exceeded in 11 of the 12 categories in terms of the number of tenders, and in 10 of the 12 in terms of financial value. The IT equipment category was the only one that does not reach the threshold of 55% in either case. The food sector exceeded the target in terms of the number of tenders, but not in terms of financial value, where it achieved less than 55%. At the other end of the scale, printing equipment, light goods vehicles and heavy goods vehicles have already exceeded the 75% target set for 2030.

OBJECTIVES 6 AND 7:
IMPLEMENTATION ACROSS THE ENTIRE
PROCUREMENT PROCESS

Strategic Objectives 6 and 7 measure the percentage of green public procurement within the **entire procurement framework** — i.e., not only in the priority categories but across all tenders issued by the Basque public sector — in terms of both the **number of tenders** and their financial value. Objective 6 measures the percentage in terms of the number of tenders with environmental criteria as a proportion of the total, while Objective 7 measures that same percentage in terms **of the financial value** of contracts awarded. The target set for both indicators was to achieve **40%** by 2025, with a target of **60%** by 2030.

PROGRESS OF OBJECTIVES 6 AND 7



At the end of 2025, green public procurement accounted for **52%** in terms of the number of tenders and **44%** in terms of the total financial value of all Basque public procurement. Both figures exceeded the interim target of 40% set for 2025 and fell short of the 60% target set for 2030.

06.

REVIEW AND LESSONS LEARNED IN THE PERIOD 2021-2025

The analysis of the first cycle of the Green Procurement and Contracting Program of the Basque Country 2030 provided a strategic overview that went beyond the extent to which the quantified targets were met. Significant progress was made during the period 2021-2025, during which certain structural limitations were highlighted and lessons were learned that will be key in guiding the next phase up to 2030.

The main progress made and the limitations identified are summarised below.

MAIN PROGRESS MADE

The period 2021-2025 saw green procurement become an established operational tool in the Basque Country's public policies. The regulatory framework of the Programme was strengthened, its implementation was expanded in contractual practice, and technical and organisational capabilities were developed, allowing us to talk about a phase of maturity.

→ STRENGTHENING THE REGULATORY FRAMEWORK

This period saw significant progress in the institutional recognition of green public procurement, with its inclusion in **Law 10/2021 on Environmental Administration** and subsequently in **Law 1/2024 on Energy Transition and Climate Change**. This regulatory framework has strengthened the structural nature of green public procurement as an environmental and climate policy tool, providing it with legal backing that goes beyond programme-based planning.

→ EXCEEDING IMPLEMENTATION TARGETS IN PRIORITY CATEGORIES

The results for priority categories showed a high level of integration of environmental criteria, in most cases exceeding the interim target set for 2025. Several categories — printing equipment, light goods vehicles and heavy goods vehicles — have even exceeded the levels set for 2030.

→ GREEN PROCUREMENT HAS BECOME ESTABLISHED ACROSS PROCUREMENT AS A WHOLE

The proportion of green procurement across public procurement as a whole, also exceeded the target set for 2025, showing that the incorporation of environmental criteria is already standard practice in a significant number of tenders.

→ STRENGTHENING TECHNICAL SUPPORT FOR ENTITIES

This period made it possible to strengthen the support provided to participating entities, through services to make specifications greener, calculation and monitoring tools, the preparation of trend reports, and inter-institutional working groups. These measures have helped to professionalise the procurement function and equip the system with more robust tools.

→ CONTINUOUS MONITORING

4 annual monitoring reports were prepared during this period, making it possible to keep track of the Programme's progress on an ongoing basis and to correct any deviations every year. These reports were the basis for preparing this evaluation report.

MAIN LIMITATIONS ENCOUNTERED

Analysis of the results revealed certain structural constraints that have limited the scope of the Programme and highlighted the need to adjust the approach in the next phase.

→ INSTITUTIONAL PARTICIPATION BELOW TARGETS

The number of member entities at the end of 2025 was below the projected interim target. Moreover, the accounting methodology conflated initiating entities with contracting authorities ², resulting in a lack of consistency in the indicator. In the private sector, rather than the absence of formal participation, the main limiting factor has been the lack of a specific framework to make it easier for companies to take part in the Programme and to provide clear incentives for them to systematically integrate environmental criteria into their procurement strategies. This has affected progress towards achieving Objective 2 and highlights the need to rethink the model for engaging the private sector in the next cycle, exploring alternative approaches with greater potential to drive the value chains of the Basque business sector.

² A contracting authority is a public-sector body that has the legal capacity to enter into and award public contracts under the Law on Public Sector Contracts. An initiating entity represents a greater level of decentralisation in contracting authorities. This level is responsible for determining the need for procurement, and drafting and developing the specifications for public tenders. In most cases, each contracting authority has a single initiating entity. However, in the case of particularly complex contracting authorities such as the Basque Government or Osakidetza, there are several initiating entities.

→ UNEVEN IMPLEMENTATION ACROSS CATEGORIES AND AREAS

Although the overall level of implementation was high, an analysis by category reveals a mixed picture. Some categories far exceeded the targets, while others fell below the 55% threshold, both in terms of the number of tenders and financial value. This variability reflects varying degrees of technical maturity and familiarity with environmental criteria among contracting authorities, and has limited the Programme's ability to have a consistent impact on the market.

→ LIMITED IMPACT ON MAJOR BUYERS AND HIGHER-VOLUME CONTRACTS

Although the overall percentage of green procurement exceeded the 2025 target, the analysis suggests that the impact was not uniform across all procurement segments. The incorporation of environmental criteria into larger contracts and in entities with higher procurement volumes has particularly significant potential to drive change, which was not fully realised during this period.

→ INADEQUATE MEASUREMENT OF ENVIRONMENTAL AND ECONOMIC IMPACT

The monitoring carried out has given an overall picture of the degree of implementation, but has highlighted significant limitations in the availability and consistency of the data. Measuring environmental benefits — such as reductions in emissions or savings on resources — is still a developing field, not only in the Basque Country but also internationally, given the diversity of categories, the scarcity of environmental data on the products procured, and the methodological complexity involved in setting comparable baselines. Added to this is the **lack of systematic information on the economic impact** of green procurement: there is no consolidated data available on the effect on the competitiveness of the Basque business sector or the return on investment associated with the incorporation of environmental criteria. This shortcoming limits the Programme's ability to demonstrate its strategic value in economic terms and hinders it from being extended to the private sector, where the argument of economic benefit is particularly relevant.



07.

KEY POINTS FOR THE NEXT ACTION PLAN 2026-2030

A review of the 2021–2025 period revealed a clear transition in the programme’s development. Following an initial phase focused on regulatory consolidation, developing criteria and gradually expanding green public procurement, the next phase will require an approach aimed at increasing the impact, strengthening systematisation and concentrating efforts where the pull effect is likely to be greatest. The main guidelines that should steer the new Action Plan for 2026–2030 are set out below.

→ FROM QUANTITATIVE EASING TO QUALITATIVE IMPACT

The next cycle should evolve from a model based on increasing the number of green tenders towards a model focused on measurable results and real impact. That will involve segmenting entities and contracts based on their procurement volume and developing appropriate support tools for each segment, ensuring that the incorporation of environmental criteria translates into tangible effects on the market and value chains.

→ STRENGTHENING GOVERNANCE AND INTER-INSTITUTIONAL COORDINATION

Strengthening inter-institutional coordination mechanisms is a key factor in consolidating the structural nature of green public procurement at the various levels of public administration. In this regard, it is recommended that the method of accounting for member entities is harmonised, making a clear distinction between contracting authorities and initiating entities. If only the initiating entities that joined in 2025 were accounted for, the figure would rise to **89 entities**.

Furthermore, the systematic incorporation of green procurement into new regulations and sector-specific plans will help to strengthen its alignment with the Basque Country’s environmental and economic priorities.

→ IMPROVEMENTS TO THE MONITORING, MEASURING AND IMPACT SYSTEM

Improving the measuring system has been identified as a necessary condition for the next stage. It would be advisable to look into using **artificial intelligence** tools to carry out the automated analysis of specifications, which would make it possible to carry out a more systematic assessment of the extent to which environmental clauses are incorporated, estimate compliance with the Programme's commitments, and generate performance data tailored to each entity. This approach should be complemented by strengthening implementation indicators and developing robust methodologies for estimating environmental and economic benefits, moving towards a more accurate, transparent assessment model.

→ TARGETED ENGAGEMENT OF AGENTS AND INCREASING PARTICIPATION

Experience from the 2021-2025 period shows that the number of participating entities is not, in itself, a sufficient indicator of the Programme's impact. For the next cycle, there is a need to strengthen the model for engaging agents, ensuring that entities do not only formalise their commitment, but also have clear incentives, are aware of their obligations, have technical support to fulfil them, and receive regular feedback on their own performance. This approach would involve categorising entities based on their pull capacity and focusing efforts where the multiplier effect is likely to be greatest.

→ ENGAGING THE PRIVATE SECTOR

Experience from the 2021-2025 period shows that the formal framework for private-sector participation was not fully developed, which limited the Programme's scope in this area. For the next cycle, there is a need to explore alternative models for engaging the private sector, with greater pull capacity on the value chains of the Basque business community. In this regard, it would be advisable to take advantage of synergies with existing initiatives aimed at integrating sustainability criteria into business management, which could act as a complementary lever for the Programme without the need to create a specific framework for participation.

→ ADAPTING TO THE NEW EUROPEAN REGULATORY FRAMEWORK AND OPPORTUNITIES

The European context offers a prime strategic opportunity for the next cycle. The **Clean Industry Deal** and its associated regulations not only strengthen the role of green public procurement as a driver of industrial transformation and environmental change, but also make it easier to put this into practice by providing harmonised methodologies, verifiable information and common standards.

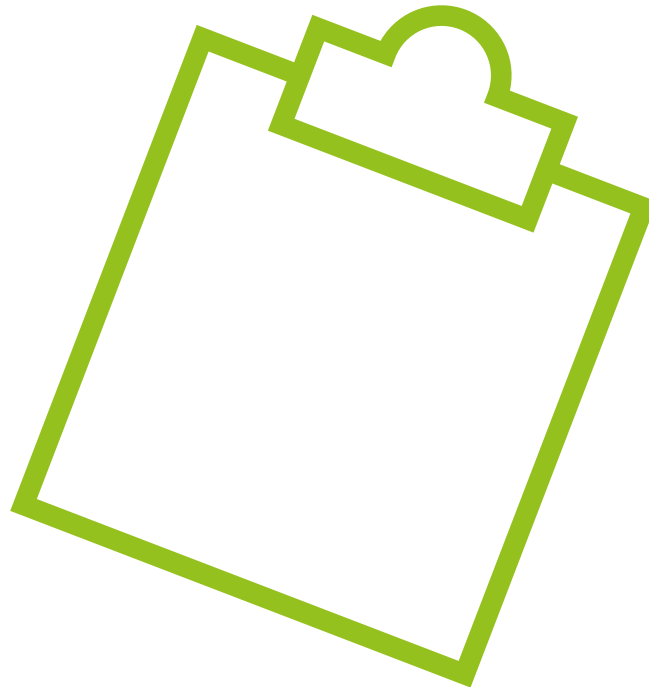
The most important developments for the Basque Country include the following:

- The **Ecodesign for Sustainable Products Regulation (ESPR)** introduces compulsory minimum green public procurement criteria for the first time for the products it regulates, making green procurement a binding regulatory instrument aimed at driving demand for sustainable products.
- The **Industrial Accelerator Act**, which is expected to be approved in 2026, sets out compulsory minimum criteria for incorporating low-carbon materials into public procurement, initially affecting steel, cement and aluminium, with plans to extend this to other sectors.
- The **Circular Economy Act**, which is also due to come into force in 2026, will introduce compulsory standardised circular criteria for public procurement, with a particular impact on sectors such as construction.
- The **review of the 2014 Public Procurement Directives** will make it easier to incorporate criteria relating to sustainability, resilience and preference for European products into public procurement for strategic sectors.

These regulatory frameworks will be supported by new technical tools, which will make it easier to put green procurement into practice. The **Digital Product Passport** will collect structured, verifiable information on the environmental performance of products — carbon footprint, recyclability, durability, secondary material content — enabling it to be used as an objective criterion in procurement processes. In addition to these measures, there are **harmonised frameworks for calculating environmental indicators** (the UNE-EN 4555X family of standards and Product Environmental Footprint (PEF) methodology) and **voluntary carbon intensity labels**, as provided for in the Industrial Accelerator Act, which will make it easier to identify low-emission products in public procurement procedures.

All of these developments will require a gradual adaptation of the criteria and tools currently used in the Basque Country, in order to bring them into line with the new requirements and to take advantage of the opportunities emerging in the European market.

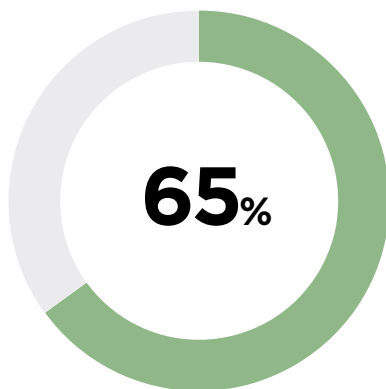
Within this framework, the new Action Plan 2026-2030 has been devised as a phase of **further development, greater focus and continuous improvement**, aimed at establishing green public procurement as a strategic tool that is fully integrated into Basque public policy, with a growing ability to transform the market.



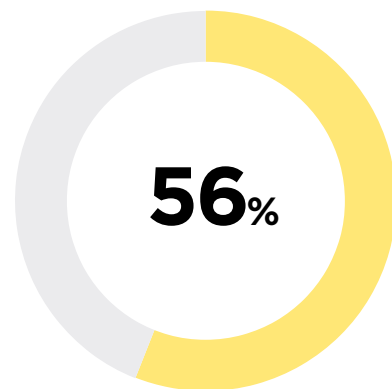
ANNEX 1.

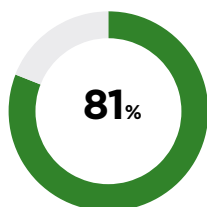
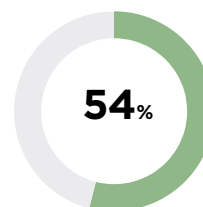
PROGRESS LEVEL ON ACTIVITIES AND THE LEVEL OF BUDGET IMPLEMENTATION

OVERALL PROGRESS
OF THE ACTIONS

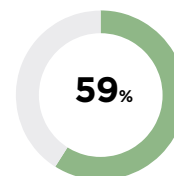


OVERALL BUDGET
IMPLEMENTATION RATE

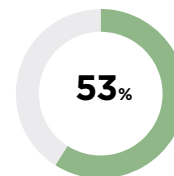
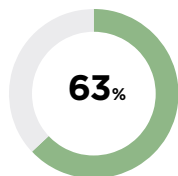


AREA 1.**CONSOLIDATE GREEN PROCUREMENT AS AN ESSENTIAL TOOL IN THE ROLL-OUT OF THE BASQUE COUNTRY'S POLICIES****PROGRESS LEVEL
OF AREA 1****BUDGET IMPLEMENTATION
RATE FOR AREA 1****LINE OF ACTION****PROGRESS LEVEL****BUDGET IMPLEMENTATION RATE****LINE OF ACTION 1:**

Strengthen the role of green procurement as an operational tool within the political and legal framework of the entire Basque public sector.



LINE OF ACTION 2: Ensure that green procurement is in line with the Basque Country's environmental and economic priorities.

**ACTIONS****PROGRESS LEVEL**

Action 1: Draw up a Directive for the inclusion of environmental clauses in procurement by the Administration of the Autonomous Community and its public sector.

100 %

Action 2: Integrate green procurement into the Basque Country's relevant new regulations and policies.

100 %

Action 3. Review the green procurement criteria and update them every 3 years to bring them into line with Basque priorities.

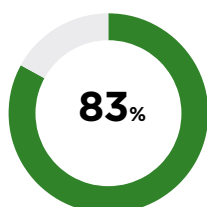
75 %

Action 4: Ensure that green procurement resources support the Basque Country's sustainable development priorities.

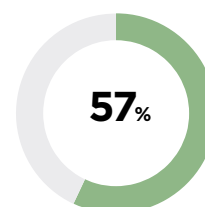
50 %

AREA 2.
MAKE PROGRESS IN THE COMMITMENT TO GREEN PROCUREMENT
IN THE BASQUE PUBLIC AND PRIVATE SECTORS

**PROGRESS LEVEL
OF AREA 2**



**BUDGET IMPLEMENTATION
RATE FOR AREA 2**

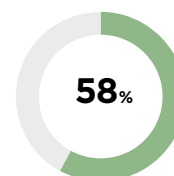


LINE OF ACTION

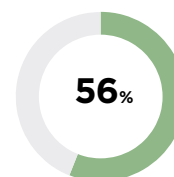
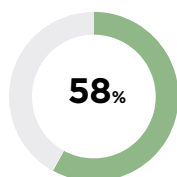
PROGRESS LEVEL

BUDGET IMPLEMENTATION RATE

LINE OF ACTION 3: Secure the participation of the entire Basque public sector.



LINE OF ACTION 4: Raise awareness amongst and mobilise Basque companies.



ACTIONS

PROGRESS LEVEL

Action 5: Set up working groups, tailored to the profile of each administration, to speed up the incorporation of environmental criteria into tenders, using Udalsarea 2030 as the main network.

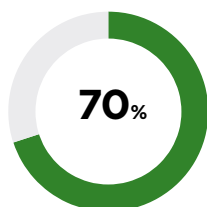
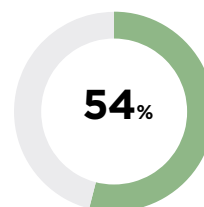
100 %

Action 6: Set up a working group to ensure that secondary materials are incorporated into public works, in accordance with the uses and quality standards set out in the Basque Country's Waste Prevention and Management Plan 2030.

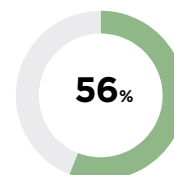
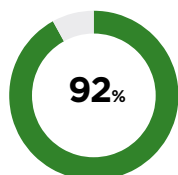
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Action 7: Define a specific strategy/programme for green procurement in the Basque business sector, which will drive the incorporation of environmental criteria into the procurement processes of Basque companies.

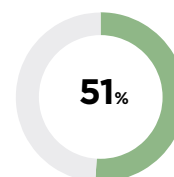
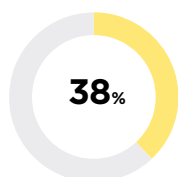
40 %

AREA 3.**MAKE GREEN PROCUREMENT A STRUCTURAL, INNOVATIVE FEATURE IN ORGANISATIONS****PROGRESS LEVEL
FOR AREA 3****BUDGET IMPLEMENTATION
RATE FOR AREA 3****LINE OF ACTION****PROGRESS LEVEL****BUDGET IMPLEMENTATION RATE**

LINE OF ACTION 5: Provide resources for systematic and strategic implementation.



LINE OF ACTION 6: Professionalise the role of procurement among all of the personnel involved.

**ACTIONS****PROGRESS LEVEL**

Action 8: Strengthen the personalised support or advice service for making tenders greener.

100 %

Action 9: Develop and/or adapt technical tools and resources for green procurement.

100 %

Action 10: Launch pilot initiatives in underdeveloped areas of green procurement, focusing on priority areas such as life-cycle costs and the procurement of innovation.

80 %

Action 11: Set up a regular training programme on green public procurement for the Basque public sector, among others, through the Basque Institute of Public Administration (IVAP).

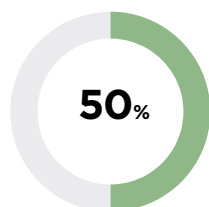
75 %

Action 12: Develop material for induction manuals for new staff, explaining their strategic role and the obligation to take environmental criteria into account in their actions.

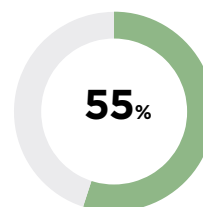
0 %

AREA 4. HAVING A SUITABLE, HIGH-QUALITY MARKET THAT IS READY

PROGRESS LEVEL FOR AREA 4



BUDGET IMPLEMENTATION RATE FOR AREA 4

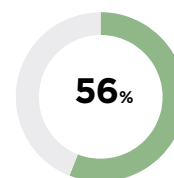
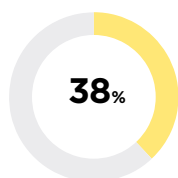


LINE OF ACTION

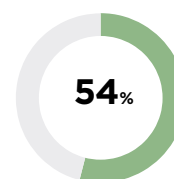
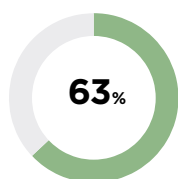
PROGRESS LEVEL

BUDGET IMPLEMENTATION RATE

LINE OF ACTION 7: Foster dialogue and collaboration with the market in order to find more innovative, sustainable and competitive solutions.



LINE OF ACTION 8: Prepare supplier companies, particularly SMEs, to meet the environmental requirements of contracting authorities.



ACTIONS

PROGRESS LEVEL

Action 13: Set up channels for dialogue between contracting entities (public and private) and suppliers, focusing on product groups or priority areas, in order to identify needs, raise awareness of existing solutions and maximise outcomes, through mechanisms such as preliminary market consultations and a partnership programme for innovation, among others.

25 %

Action 14: Ensure that supplier companies are involved in developing new tools and resources.

45 %

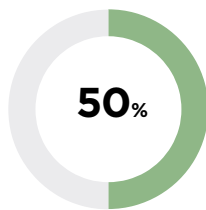
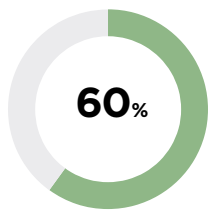
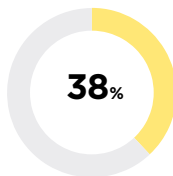
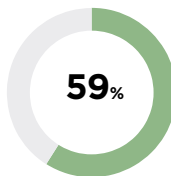
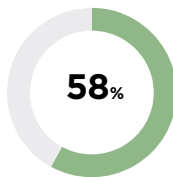
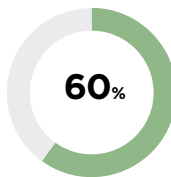
Action 15: Integrate green procurement into the Pyme Circular programme.

30 %

Action 16: Hold training sessions for suppliers on including environmental considerations in their goods and services and on preparing tenders.

100 %

AREA 5.
HIGHLIGHTING THE PROGRESS, ACHIEVEMENTS AND
BENEFITS OF GREEN PROCUREMENT

PROGRESS LEVEL FOR AREA 5		BUDGET IMPLEMENTATION RATE FOR AREA 5	
			
LINE OF ACTION	PROGRESS LEVEL	BUDGET IMPLEMENTATION RATE	
LINE OF ACTION 9: Measure the implementation and estimate the benefits of environmentally sustainable procurement.			
LINE OF ACTION 10: Publicise and promote the Basque Country's progress and achievements at a domestic, European and international level.			
ACTIONS	PROGRESS LEVEL		
Action 17: Define a system for measuring benefits/results that makes it possible to identify the advantages of green public procurement.	80 %		
Action 18: Integrate features that make it possible to calculate environmental benefits in existing green procurement criteria.	0 %		
Action 19: Disseminate best practices and examples of green procurement specifications in the Basque public sector, including through half-yearly newsletters with news and updates on the subject.	80 %		
Action 20: Secure greater participation by the Basque Country in the United Nations' "Sustainable Public Procurement Programme" and ICLEI's "Procura+" programmes.	80 %		
Action 21: Hold an annual forum on public procurement to recognise and share experiences and speed up the incorporation of environmental criteria into procurement.	20 %		

