



## Concrete Europe position to leverage public procurement to stimulate lead market for low carbon cement and concrete construction

### What does the concrete sector expect from the revision of the public procurement directives?

Concrete Europe believes that public procurement should stimulate lead markets for the uptake of low-carbon and circular construction solutions across the entire construction value chain, including aggregates (primary and recycled), cement, concrete and other construction products. It is estimated that construction represents 23% of the total public procurement (2019) and that 31% of the cement use is in public procurement of construction<sup>1</sup>. Public procurement can provide long-term demand signals that enable the construction materials industry to invest in capital-intensive decarbonisation technologies such as carbon capture, alternative fuels and new low-clinker cement.

Although current public procurement directives allow for public authorities to make choices beyond the price-only criteria, 55% of procurement procedures use lowest price as the only award criterion for public contracts<sup>2</sup>. The uptake of environmental and social criteria remains limited due to weak enforcement, low capacity, and inconsistent guidance. It is crucial to close this action gap and remove existing barriers.

**From 2030, the combined effect of the Construction Products Regulation (CPR)'s mandatory product-level GWP indicator and the Energy Performance of Buildings Directive (EPBD)'s life-cycle GWP requirements at building level provide lead markets targets for the decarbonisation of the construction sector at building level.** Yet, without public procurement driving large-scale demand from public authorities towards low-carbon and circular solutions already before 2030, the scale of investments needed into decarbonisation technologies to meet the EU's climate objectives will not be achieved.

There is therefore a window of opportunity, before 2030, to ensure that public procurement actively supports the investment decisions being made by the construction products industry by creating demand for low carbon circular solutions in public construction projects.

That is why we believe the Commission should propose a regulatory framework that:

- Sets horizontal rules for “*how to buy*” but leaves “*what to buy*” to sectoral legislation;
- Ensures coherence between general procurement rules and sector-specific legislation such as the CPR, while respecting technology neutrality and performance-based approaches;

<sup>1</sup> <https://www.brussels-school.be/sites/default/files/2024-06/Public%20procurement%20construction%20steel%20and%20cement%20EU%20FINAL.pdf>

<sup>2</sup> [https://single-market-economy.ec.europa.eu/single-market/public-procurement\\_en](https://single-market-economy.ec.europa.eu/single-market/public-procurement_en)

- Strengthens European industrial resilience and security of supply by ensuring a level playing field, reciprocity in market access, compliance with EU environmental and social standards, and by giving due consideration to proximity of supply and carbon footprint of transport;
- For cement, combines environmental labelling requirement with a life-cycle approach;
- For concrete construction, focus the assessment at construction work level, over the entire service-life including the operational phase, taking all levers into account and allow for their optimisation in view of the final result;
- Requires public buyers to apply Best Price-Quality Ratio (BPQR) as the standard contract award criterion to favour sustainable products;
- Incentivises the use of green public procurement;
- Favours European products given that our production is local.

## 1. Coherence between general rules applicable to all sectors and sectoral rules

Public procurement rules will apply to products and services from all sectors of the economy which are regulated at sectoral level. That is why we believe that the Public Procurement framework should be limited to “*how to buy*” provisions, for instance the use of Best Price-Quality Ratio (BPQR) as the standard contract award criterion”, and leave the “*What to buy*” in sectoral legislation like the CPR. Concerning construction products, the CPR contains provisions related to public procurement which can be activated by the Commission (e.g., environmental sustainability labelling requirements of articles 22.9). Any sustainability requirements introduced in public procurement should rely on common European definitions and CPR-based indicators, and avoid disproportionate administrative burdens, particularly for SMEs, which represent a significant share of the aggregates and construction materials sector.

## 2. Green, social and public procurement of innovation - Best Price Quality Ratio (BPQR)

**Low carbon and circular cements and in general products to produce low carbon concrete structures are already on the market.** EU and national frameworks allow the inclusion of additional many elements such as the mandatory calculation of global warming potential of the building/infrastructure or the use of existing national labels<sup>3</sup>, however their use is limited. In order to mainstream additional criteria, Concrete Europe believes that EU law should require public buyers to apply Best Price-Quality Ratio (BPQR) over the whole life cycle as the standard contract award criterion. Member states should be required to set mandatory minimum weightings to ensure sustainability criteria meaningfully affect award decisions, and put into place corresponding action plans and supportive measures. The systematic use of BPQR should rely on performance-based and technology-neutral criteria, such as Global Warming Potential per functional unit, and should not favour specific materials. Public procurement should also promote circular economy practices, including the use of recycled aggregates, secondary raw materials and design for durability, reuse and recyclability.

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<sup>3</sup> For instance the German CCC label: <https://www.vdz-online.de/leistungen/zertifizierung/co2-label-fuer-zement-ccc-zertifizierung>

### 3. Green public procurement

Concrete Europe believes that the general legislative framework should further incentivise the use of green public procurement which can act as a lead market for low carbon cement and concrete construction. Our associations support the introduction of green public procurement at EU and Member State level, accompanied by clear strategies or implementation plans to ensure their delivery. We also believe that major public buyers should be legally obliged to develop green public procurement strategies.

At building and infrastructure level, the Joint Research Centre (JRC) developed Green Public Procurement criteria for (1) Road design, construction, and maintenance and (2) for office buildings. Concrete Europe is awaiting the final adoption of the GPP criteria for buildings. Those criteria should be more broadly taken up by European, national, and local authorities in their procurement practices.

### 4. Made in Europe

Cement, concrete and aggregates (primary and recycled) are all local products made with local raw materials in cement and concrete plants close to construction sites across Europe<sup>4</sup>. Our products are by nature local products, as their weight and transport costs make proximity of supply essential. Sourcing materials close to the point of use significantly reduces transport-related emissions and strengthens local value chains. That is why our associations support the idea to prioritise European products in the procurement process by including “*made in Europe*” criterium within public procurement, taking into account proximity sourcing, resilience of supply chains, and full compliance with EU environmental and social standards.

Finally, Concrete Europe would like to underline the importance of:

1. Effectively leveraging public procurement as a driver for lead markets in circular and low carbon construction materials—particularly given the limited deployment of national green public procurement frameworks—the EU framework must apply to a wide range of public works. Currently, around 20% of overall procurement is covered by the EU framework, of which a quarter concerns construction works. Against this backdrop, raising the public contract value thresholds under Article 15 of Directive 2014/25 would undermine the framework’s impact and should be avoided.

CEMENT AND CONCRETE: ONE VALUE CHAIN,  
SAME DECARBONISATION COMMITMENT,  
DIFFERENT POLICY NEEDS  
CEMENT AND CONCRETE

Cement and concrete are often treated as the same; in reality, they are different materials, have a different manufacturing process and require distinct decarbonisation approaches. Cement is a regionally traded, energy-intensive intermediate product, produced in large industrial plants. Its decarbonisation depends on breakthrough technologies and heavy investment, making it best suited to product-level measures such as carbon benchmarks, labelling and industrial support under the Industrial Accelerator Act.

Concrete, by contrast, is a locally manufactured construction solution, designed for each project and responsible for the final performance of buildings and infrastructure. Its carbon footprint depends not only on cement, but also on design, durability, material efficiency and service life. As such, it should be addressed at the level of construction works over the full life cycle, notably through public procurement, rather than through product-only metrics. A single definition of “low-carbon” cannot capture both realities and risks being ineffective.

<sup>4</sup> European Union and European Economic Area

2. The strategic importance access to resources. Cement concrete and aggregates are essential for the delivery of housing, infrastructure, renewable energy, climate adaptation and defence projects. Public procurement policies must be coherent with policies ensuring access to primary raw materials and streamlined permitting procedures. Without improved permitting conditions and access to mineral reserves, demand-side measures alone will not deliver Europe's climate and infrastructure objectives.
3. A well-trained public administration which is crucial in the implementation of public procurement, especially in a highly technical sector such as the construction sector. To achieve its policy goals, the European Union should:
  - Support Member States in developing and training their agents;
  - Ensure public authorities can provide sufficient financial resources to implement GPP effectively;
  - Streamline monitoring and reporting of GPP through strong EU governance, harmonised monitoring mechanisms.