

WorldGBC ERN position on the revision of EU rules on public procurement

January 2026

The World Green Building Council's Europe Regional Network welcome this public consultation on the revision of EU rules on public procurement. We support a comprehensive revision of the Public Procurement Directives and call on the European Commission to acknowledge that procurement is a crucial way to drive an energy efficient, low emission, regenerative and just transition in the built environment.

We strongly align with the Commission's goal of aligning public procurement policy with EU strategic goals and objectives across the green, social and innovation areas, as well as strengthening EU economic security and competitiveness. We also agree that enhancing efficiency in public procurement through faster, more streamlined processes is important, but simplification must not come at the expense of sustainability, quality or environmental safeguards.

Procurement provides an excellent route for a top-down shift in the way and terms on which public authorities engage the buildings sector in construction projects. European procurement must move towards a model with energy efficiency, sustainability and circularity at its core. This is already reflected in Article 5 of the [Energy Efficiency Directive](#), which encourages public bodies to consider life cycle carbon emissions alongside economic and social benefits in their investment and policy decisions. In this context, public procurement rules should require the calculation and disclosure of life cycle global warming potential (GWP) emissions of new public buildings in advance of the requirements established in the 2024 revision of the [Energy Performance of Buildings Directive](#).

The vision set out in WorldGBC's [EU Whole Life Carbon Roadmap](#) in 2022 requires that all publicly procured projects be net zero whole life carbon (WLC) well before 2050. In this vision, public authorities will be first adopter role models, embracing tools such as the Level(s) Framework and third-party verified environmental data for

products to facilitate the multi-actor collaboration and large-scale thinking necessary to deliver a net zero carbon built environment.

Public procurement is an important driver for broader market transformation, and these recommendations aim to harness its clear leadership role to model sustainable best practice. Multi-level action is required, and the revision of the Public Procurement Directive will be a crucial first step.

We recommend that the revision of EU rules on public procurement takes the following actions to address the impact of buildings:

- Require all new public buildings to be positive energy (in operation), with service-/performance-based energy contracting and district integration where possible
- Require calculation and reporting of life-cycle GWP for all new public buildings according to the methodology set out in the forthcoming EPBD Delegated Act.
- Incentivise take-back schemes for building systems, lighting, furniture and promote technology systems-as-a-service and energy-performance-based contracting
- Stipulate that all tenders include sustainability/circularity criteria based on Level(s)
- Require all public buildings to undergo reuse assessment to discourage demolition
- Require all public buildings to undergo pre-demolition/ deconstruction audits and share data across value chain
- Introduce minimum requirements in new public construction and renovations so a percentage of products/materials from demolition can be reused/recycled
- Minimum requirements for products/materials in public projects to be reused/reusable and/or recycled/recyclable

- Apply minimum requirements for new public building design and large renovations
- Mandate reporting and checking of environmental performance criteria in the design, delivery, commissioning and verification of public buildings to close the performance gap
- Outline criteria to award contracts based on life cycle costing (LCC) or total cost of ownership instead of capital costs
- Outline criteria that encourage use of regionally and sustainably sourced secondary materials and/or minimal heavy transport
- Outline criteria for awarding contracts based on lower embodied carbon through transition towards zero emissions construction machinery and materials transport

These actions will ensure that the revised EU rules on public procurement align with the EU Green Deal's climate and sustainability goals, as well as the Commission's aims to promote resilience, while leveraging public procurement as a catalyst for market transformation.

By embedding energy efficiency, circularity, and whole life carbon considerations into procurement processes, in a way that supports simplification and flexibility without undermining sustainability, the revised EU procurement rules can drive innovation, improve resource efficiency, and create long-term economic and environmental benefits for businesses and citizens alike. A forward-thinking approach to procurement will not only enhance competitiveness across the EU but also accelerate the transition to a decarbonised and resilient built environment.