

## ESPP input to public consultation on Revision of EU Rules on Public Procurement

26<sup>th</sup> January 2026

[https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/15492-EU-public-procurement-rules-revision\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/15492-EU-public-procurement-rules-revision_en)

ESPP welcomes the announced aim to revise EU rules on public procurement towards sustainability and resilience. This should be coherent with the EU Circular Economy Act, planned for 2026, and with implementation of the EU Critical Raw Materials Act.

ESPP notes the proposals in the Commission's 'Vision for Agriculture and Food' [COM2025\(75\)](#) to strengthen the role of Public Procurement with a "best value" approach to reward quality and sustainability, including certified Organic products and short food supply chains, and in the Enrico Letta [report April 2024](#) "Much more than a market - Speed, Security, Solidarity – Empowering the Single Market to deliver a sustainable future and prosperity for all EU Citizens".

At present, the EU public procurement directives prioritise the lowest cost option (e.g. art. 67.1 of 2014/24/EU "most economically advantageous"), subject to respecting environmental obligations (art. 18.2) and only optionally the possibility to take into account the "price-quality ratio ... on the basis of criteria including environmental aspects" (art. 67.2), and then subject to the condition that environmental externalities can be taken into account only if "monetary value can be determined and verified" (art. 68.1.6). This condition is often difficult to achieve and to document.

**ESPP suggests that consideration of environmental aspects be no longer an option subject to difficult conditions, but be required wherever feasible.**

- Respect of environmental obligations should remain obligatory
- Wherever feasible, environmental aspects should be considered alongside price-quality ratio
- If available and if relevant, should be taken into account:
  - Life Cycle Analyses,
  - Product Environment Footprints,
  - monetarisation of externalities,
  - environmental and sustainability labels and certifications,
  - supplier Corporate Sustainability Reporting,
  - EU Taxonomy criteria.
- Aspects considered should include
  - greenhouse emissions,
  - circularity, including design for durability, reuse and recyclability, use of secondary raw materials
  - recycled content,
  - Critical Raw Materials,
  - bioeconomy,
  - Organic Farming,
  - short supply chains, local, regional and EU production.

This wording should be coherent with objectives of the announced EU Circular Economy Act and with the existing EU Circular Economy Action Plan, and with relevant EU regulations, in particular: Taxonomy, Corporate Sustainability Reporting Directive, EcoDesign, Eco Label, BioEconomy Strategy.

*The European Sustainable Phosphorus Platform (ESPP) promotes implementation of sustainable nutrient management in Europe, in particular phosphorus recycling. ESPP is a non-profit organisation funded by its members and brings together some 50 companies and research organisations active in water and waste, mineral and organic fertilisers, chemicals, anaerobic digestion, nutrient recycling technologies.*