

Brussels, 17.7.2014 COM(2014) 479 final

REPLIES OF THE COMMISSION TO THE SPECIAL REPORT OF THE EUROPEAN COURT OF AUDITORS

"HOW DO THE EU INSTITUTIONS AND BODIES CALCULATE, REDUCE AND OFFSET THEIR GREENHOUSE GAS EMISSIONS?"

EN EN

REPLIES OF THE COMMISSION TO THE SPECIAL REPORT OF THE EUROPEAN COURT OF AUDITORS

"HOW DO THE EU INSTITUTIONS AND BODIES CALCULATE, REDUCE AND OFFSET THEIR GREENHOUSE GAS EMISSIONS?"

EXECUTIVE SUMMARY

I. The European Union leads in proactive climate policy and implementation at international level. In the view of the Commission, EMAS is the appropriate policy instrument to reduce the carbon footprint of EU institutions and bodies. Furthermore, there are many examples of where policies implemented in relation to the achieving the 20% emissions reduction goal for 2020 also apply to public administrations, including EU institutions and their personnel. This will continue to be the case regarding the new goals for 2030 (including the proposed 40% greenhouse gas emissions reduction target).

The Commission has an environmental policy for its own activities that prioritises pollution prevention, natural resource efficiency, CO2 emissions reduction, lower waste generation, promotion of recycling, inclusion of environmental criteria in calls for tender, respect of environmental legislation and more sustainable behaviour in staff and stakeholders, etc.

It is therefore the Commission's strategy to reduce the real environmental impact of its daily and administrative activities through the EMAS environmental management system.

The Commission seeks, through EMAS to achieve real reductions in impact, rather than through mitigating (particularly offsetting) CO2 emissions.

Given the Commission's size and organisation, the EMAS system was first implemented in a small number of its buildings in Brussels and its scope has been gradually expanded. In 2013 the EMAS registration covered 89% of staff and 57% of floor space across all sites.

In the current budgetary climate, the Commission extends its system progressively with the available resources. The Commission leads by example, encouraging other institutions and bodies to implement EMAS by chairing the GIME (Groupe inter-institutionnel de management environnemental).

- II. The Commission is continuously expanding the scope of the EMAS and its reports on emissions. The huge progression of the EMAS scope indicates clearly the commitment of the Commission to reduce its environmental impacts. Full reporting is still the objective for the Commission when the EMAS will be fully implemented.
- IV. The Commission has achieved an important reduction in CO2 emissions in Brussels since 2005 per square metre without assuming that electricity generated from renewable sources generates zero emissions (-46.2% between 2005 and 2012 in the EMAS office buildings).
- V. In the Commission, the implementation of EMAS and its continuous extension has progressed well taking into account the requirements of the regulation and budgetary limitations. In addition, the extension of EMAS has to be considered as important related to its size, the geographical distribution and organisation pattern.

Introducing environmental criteria into public procurement is one of the objectives of the Environmental Policy of the Commission.

VI. The Commission intends to continue the deployment of EMAS, which constitutes a common policy for reducing the carbon footprint of the administrative operations of the EU institutions and bodies.

VII. The Commission partially accepts this recommendation. In the view of the Commission, EMAS is the appropriate policy instrument to reduce the carbon footprint of EU institutions and bodies. The Commission will therefore consider this recommendation through the further deployment of EMAS.

However, setting a quantified overall reduction target for greenhouse gas emissions for the year 2030 does not take account of wider considerations, such as cost effectiveness and specificities across EU institutions and bodies.

Furthermore, the Commission will continue to develop appropriate policies to reduce greenhouse gas emissions in a cost-effective and as far as possible holistic way, including in relation to 2030, based on thorough impact assessments providing a full evaluation of the costs and benefits involved where appropriate.

Reducing emissions where least costly is a key aspect of current policy which is why binding reduction targets only tend to be set on a European and Member State rather than organisational basis. This retains flexibility to meet targets in the best way possible.

Although EU legislation does not impose specific emission reduction targets on public administrations further action can still be taken at this level, including through the continued deployment of EMAS which constitutes a common policy for reducing the carbon footprint of the administrative operations of the EU institutions and bodies.

- (a) The Commission accepts the recommendation subject to the successful development of the Organisation Environmental Footprint Method in relation to public administrations. Furthermore, the Commission considers that, through the implementation of EMAS, it has established a proper way of identifying, measuring and reporting on the most significant direct and indirect environmental impacts, including its GHG emissions.
- (b) The Commission accepts this recommendation whilst underlining the voluntary approach and the autonomy of each EU institution and body to decide the appropriateness of such possible offsetting.

Furthermore, the Commission will continue to seek real reductions in emissions via existing policies, including EMAS.

Such a common approach will also have to take into account i) the need to avoid discouragement of further efforts to achieve real reductions in emissions, ii) the existing mechanisms including emissions trading, and iii) the availability of reporting regimes and sufficiently high standard offsetting schemes. It will also require an assessment of the effects on EU resources and use of public money.

(c) The Commission accepts this recommendation and fully supports the promotion of the EMAS scheme. Scope limitations are part of the EMAS scheme itself in order to allow each organisation to address the most significant environmental aspects.

The Commission will consider signing the European Code on Data Centre Energy Efficiency after further evaluating if it is compatible with the financial perspectives and especially for administrative appropriation.

The current revision of the FR/RAP sets in place the regulatory framework encouraging further green public procurement including life cycle costing, in line with Directive 2014/24/EU.

The Commission will further develop guidance documents for GPP and promote those documents at the GIME group.

INTRODUCTION

- 1. The classical definition of sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their needs. It therefore embraces the concept of 'limitations' to ensure that the environment can meet both present and future needs.
- 4. The European Union leads in proactive climate policy and implementation at an international level. There are many examples of where policies implemented in relation to the achieving the 20% emissions reduction goal for 2020 also apply to public administrations, including EU institutions and their personnel. This will continue to be the case regarding the new goals for 2030 (including the proposed 40% greenhouse gas emissions reduction target).
- 6. The Commission plans to continue in its proactive approach to climate policy and implementation and will continue to develop appropriate policies to reduce greenhouse gas emissions in a cost-effective and as far as possible holistic way. Although EU legislation does not impose specific emission reduction targets on public administrations further action can still be taken at this level, including through the continued deployment of EMAS. The huge progression of the EMAS scope indicates clearly the commitment of the Commission to reduce its environmental impacts.
- 7. The Commission will continue to seek real reductions in emissions via existing policies, including EMAS, while also considering other options such as offsetting.

Such consideration will also have to take into account: i) the need to avoid discouragement of further efforts to achieve real reductions in emissions, ii) the existing mechanisms including emissions trading, and iii) the availability of reporting regimes and sufficiently high standard offsetting schemes. It will also require an assessment of the effects on EU resources and use of public money.

OBSERVATIONS

- 12. The reliable and comprehensive information on the carbon footprint is not a precondition to draw and implement mitigations strategies. At the Commission, mitigations are in place with clear environmental impact reductions evident.
- 16. The Commission considers that the use of the common method (OEF) to measure and communicate the life cycle environmental performance of organisations in accordance with its Recommendation of 9 April 2013 should be encouraged, including by EMAS registered organisations. After reviewing the results of the pilot phase, once the revised OEF method will be available, the Commission will consider the possibility to launch an internal pilot phase to develop specific sectorial rules for the calculation and reporting of the environmental footprint of the Commission or similar public administrations.
- 18. As regards the reference to EU institutions and bodies not reporting all elements of their GHG emissions, the EMAS regulation indicates that organisations must report on emissions where appropriate and where significant. Organisations are allowed to report partially their direct and indirect emissions depending, amongst other on the scope of their EMAS registration. If organisations do not report at all on one of the EMAS core indicators, an explanation has to be given.
- 21. Increasing the scope of activities covered is already tackled in the 2014 EMAS action plan and will lead to a more complete report for 2013 and further results.
- 29. The OEF method, as recommended by the Commission, is currently subject to an extensive pilot-testing until end 2016. The objectives of the pilot phase include the definition of certain

technical requirements which will be key to a wide implementation of the method in an administration organised like the Commission. Moreover, the results of the pilot phase will probably lead to a revision/improvement of the OEF method. During this exercise, the Commission has given priority to the development of OEF sectorial rules (OEFSRs) for those sectors representing the highest share of environmental impacts. The public administration sector is not one of these. After reviewing the results of the pilot phase, once the revised OEF method will be available, the Commission will consider the possibility to launch an internal pilot phase to develop specific sectorial rules for the calculation and reporting of the environmental footprint of the Commission or similar public administrations.

- 31. Emissions used in 1990 are unknown for the majority of organisations. Assessing their current performance against actual emissions in 1990 is usually done through estimations.
- 35. The Commission considers that reporting emissions as zero based on use of green electricity might hide the real decrease (or increase) in energy consumption.
- 37. By buying green electricity the Institutions encourage electricity producers to opt for renewable generation facilities.

39.

- (c) Most visitors and external participants may report on their travel emissions through their own organisation which might lead to double counting.
- 44. Although EU legislation does not impose specific emission reduction targets on public administrations, further action can still be taken at this level, including through the continued deployment of EMAS.

Reducing emissions where least costly is a key aspect of current policy which is why binding reduction targets only tend to be set on a European and Member State level rather than organisational basis. This retains flexibility to meet targets in the best way possible.

- 46. In the EMAS Steering Committee of January 2014, the Commission decided to establish long term targets in addition to the annual targets already existing. This was decided to give better guidance to its services in establishing annual targets and actions.
- 47. Since the Commission staff is decreasing (-5% under the current financial perspectives) and since its EMAS scope is continuously evolving, it will continue to report in both, absolute and relative, terms.
- 51. The Commission will continue to develop appropriate policies to reduce greenhouse gas emissions in a cost-effective and as far as possible holistic way, including in relation to 2030, based on thorough impact assessments providing a full evaluation of the costs and benefits involved where appropriate.

Reducing emissions where least costly is a key aspect of current policy which is why reduction targets only tend to be set on a European and Member State level rather than organisational basis. This retains flexibility to meet targets in the best way possible.

Although EU legislation does not impose specific emission reduction targets on public administrations, further action can still be taken at this level, including through the continued deployment of EMAS.

52. A very wide range of possible offset credits exist of very variable quality.

Rules exist governing the use of offsets for compliance under EU climate legislation, which, for reasons of consistency, should be reflected in any use of offsetting by EU institutions. These rules relate to both the quantity relative to own action and to the type considered of sufficient quality. It is

essential for example to ensure that actions used for offsetting are additional, subject to sound monitoring, reporting and verification to minimise the opportunities for fraud and are subject to accounting rules that avoid the possibility of double counting.

The Commission will continue to give first priority to seeking real reductions in emissions via existing policies, including EMAS, while also considering other options such as offsetting.

Such consideration also needs to take into account: i) requirement to avoid discouragement of further efforts to achieve real reductions in emissions, ii) the existing mechanisms including emissions trading, and iii) the availability of reporting regimes and sufficiently high standard offsetting schemes. It will also require an assessment of the effects on EU resources and use of public money.

61. Last indent: The Commission will continue to seek real reductions in emissions via existing policies, including EMAS, while considering the recommendation to develop a common approach to offsetting for the EU institutions.

It is important to bear in mind that since 2012 CO2 emissions from all flights within and between European Economic Area (EEA) countries are covered by the EU Emissions Trading System (this applies to Croatia from 1 January 2014). This means air operators must acquire and surrender allowances to cover all such emissions. Flights within the EEA are thus subject to the EU ETS carbon price, and this can be considered equivalent to offsetting.

See comment on point 52.

- 65. The Commission would like to point out that <u>Table 6</u> does not reflect the actual square metres covered but only the percentage of building surface areas.
- 67. One should not underestimate the efforts to comply with the EMAS requirements. The Commission is by far the biggest institution. The Commission has a very clear policy to progressively expand EMAS to all its sites and activities within the available budget (see decision C(2013)7708).
- 68. The extension of the EMAS to Brussels and Luxemburg started immediately after the 2009 decision with full activities registered in 2010 for Brussels and in 2012 for Luxembourg. Full buildings registration will be done in 2015 in Brussels and progressively in other the sites.
- 69. The decision to certify under ISO 14001 the five sites of the Joint Research Centre was taken before the Commission decided to expand the EMAS in 2009. EMAS registration for these sites is currently ongoing.
- 70. The Commission has decided that the extension of the EMAS has to be monitored at senior level by the EMAS steering Committee. Extension is progressively done with the most significant sites first. In terms of surfaces, the Commission's representations in Member States represent about 2% of the total Commission buildings; some of them are operated by other institutions.
- 76. It should be emphasized that the decrease by 15% between 2005 and 2012 in energy consumption in Brussels buildings was achieved when, in relation to enlargement, Commission staff increased by 25%.
- 79. The Financial Regulation and its rules of Application provide the same principles as those contained in the Directives so that EU rules are coherent with those applied by the Member States.

The new Financial Regulation (FR) and Rules of Application (RAP) that are under approval procedure should encourage further the use of environmental considerations, including life cycle costing as an award method in line with Directive 2014/24/EU.

80. The FR/RAP is a horizontal regulation not meant to list sectorial obligations per policy, but to provide general rules for the implementation of the budget.

The FR/RAP currently under approval procedure should foresee that when using life cycle costing, the EU institutions shall use methods adopted at EU level whenever available. The implementation of this possibility should be carried out by relevant services within the EMAS policy.

- 81. The Commission considers appropriate to use the Vade-mecum and specific guidance to promote Green Public Procurement on a voluntary basis while ensuring the dissemination of good practices also serving as reference to the Member States.
- 84. Overall, some kind of GPP is used in the majority of the cases, although many processes are not fully green. Only about a quarter of contracts did not include green criteria. With this result, the institutions are faring better than the average of public authorities in Europe. According to a study¹, based on an EU-wide survey on average 54% of public authorities in an EU-wide survey included some kind of green criterion in their last purchase in the period 2009-2010 for 10 priority product groups (Construction, Electricity, Cleaning Products and Services, Textiles, Food and Catering Services, Furniture, Office IT equipment, Paper, Gardening Products and Devices, Transport).
- 85. In the Commission Communication 'Public procurement for a better environment' (see footnote 43), the Commission proposed that, by the year 2010, 50 % of all tendering procedures should be green, where "green" means "compliant with endorsed common "core" GPP criteria". The percentage would be expressed in both number and value of green contracts as compared to the overall number and value of contracts concluded in the sectors for which common "core" GPP criteria have been identified. This target was later endorsed by the Council².

Since the Court also included product groups for which no EU GPP criteria exist, the methodologies on how to evaluate the achievement of the GPP target are not entirely compatible.

- 86. Together with the MS represented in the informal GPP Advisory Group, DG ENV has conducted a GPP prioritisation exercise in 2012/2013 to identify the needs for GPP criteria development. Data centres have received a high priority, and it will be decided soon if Data centre criteria will be developed. Building maintenance is expected to be included in the upcoming office building criteria. Business travel was not considered to have a specific priority.
- 87. It is a very resource-intensive process to update criteria. The Commission is endeavouring to close existing gaps and revise product groups in the framework of existing resources. The mobile phone criteria have been taken off the website because they were indeed not ambitious anymore and moreover, they have not been identified as a higher priority by the GPP Advisory Group.
- 89. Using a Life Cycle Costing (LCC) approach does not necessarily make sense for all product groups. For example if procurers want to buy environment-friendly paper, it would be enough to specify that the paper should be "recycled" or "originating from sustainable sources", because with this product group, the procurer would not have maintenance or operating costs.

The Commission is preparing the transposition of this Directive in the Financial Regulation. However, it does not make the use of LCC mandatory.

The Uptake of Green Public Procurement in the EU27, Centre of European Policy Studies http://ec.europa.eu/environment/gpp/pdf/CEPS-CoE-GPP%20MAIN%20REPORT.pdf

Council Conclusions of 22 September 2008, http://register.consilium.europa.eu/doc/srv?l=EN&f=ST%2013067%202008%20INIT

Last indent: The Commission is currently looking into providing guidance documents for LCC.

- 90. The Commission has targets for buildings energy and achieves positives results under the EMAS scheme. In Brussels, for instance, where Energy Efficiency Directive 2012/27/EU result in 0.13% of annual energy savings, the Commission drafted in its plan 1% of annual energy savings, eight times higher.
- 93. While this programme is still on going, OIB, OIL and JRC's priority have been in compliance with the applicable national or regional standards. This does not preclude the possibility that some of the more recent building projects of the Commission, and in particular those underway on the JRC-Ispra site, would indeed comply with the Green Building Programme requirements. OIB will join the programme in the future if there is an added value.
- 94. The Manual of standard building specifications (MIT) aims at achieving passive building performance and establishes the following minimum project requirements:
- Directive 2010/31/EU on the energy performance of buildings,
- Regional legal minimum requirements.

The MIT also requires that energy audits and/or energy studies be carried out in order to assess the implementation of energy efficiency solutions and introduction of renewable energy.

95. The Commission is committed to the exemplary role of public bodies' through its engagement to apply the requirements of Energy Efficiency Directive 2012/27/EU (article 4 and 5) and OIB (Brussels) has assessed the technical impact of the directive on its buildings.

In any case (both for new buildings or renovations), the ambitions of future projects and the associated financial impact should respect the available annual budget appropriation under MFF 2014-2020.

- 100. The Commission does not limit its approach to energy efficiency of a building and considers that BREEAM or similar schemes are more comprehensive and better in line with its policies and the global environmental impact of its activities.
- 101. Requirements of the Code of Conduct for Data Centres in the Commission buildings would have very important budgetary implications. The decision to go forward would also imply a serious revision of the buildings and some requirements cannot even be implemented in the Commission buildings due to their age. Nevertheless, the internal organisation of the Data Centres respects recommendations of the code of conduct.

In addition to its own Data Centres, the Commission has rented Data Centre facilities in Luxemburg and Brussels. The owners of these Data Centre facilities have signed the code of conduct.

Commission is currently reflecting on its Data Centre policy, including the use of the "Cloud".

CONCLUSIONS AND RECOMMENDATIONS

- 102. The European Union leads in proactive climate policy and implementation at international level and this approach will continue in relation to the new goals for 2030 and the proposed 40% greenhouse gas reduction target.
- 103. In the view of the Commission, EMAS is the appropriate policy instrument to reduce the carbon footprint of EU institutions and bodies.

Furthermore, there are many examples of where policies implemented in relation to the achieving the 20% emissions reduction goal for 2020 also apply to public administrations, including EU institutions and their personnel. This will continue to be the case regarding the new goals for 2030 (including the proposed 40% greenhouse gas emissions reduction target).

- 104. Commission policy aims at the reduction of GHG emissions in a cost-effective and as far as possible holistic way, in particular through the climate and energy package. In view of the limited proportion of emissions from administrative activities of EU institutions, the Commission has not considered it appropriate to set binding rules for this scale of activities. Emissions are in any case covered by the reduction targets set at EU or national levels.
- 105. There is no indication that binding rules for all the EU institutions and bodies would have led to better results.
- 106. The Commission intends to continue the deployment of EMAS, which constitutes a common policy for reducing the carbon footprint of the administrative operations of the EU institutions and bodies.

Recommendation

Common policy to reduce greenhouse gas emissions

1. The Commission partially accepts this recommendation. In the view of the Commission, EMAS is the appropriate policy instrument to reduce the carbon footprint of EU institutions and bodies. The Commission will therefore consider this recommendation through the further deployment of EMAS.

Furthermore, the Commission will continue to develop appropriate policies to reduce greenhouse gas emissions in a cost-effective and as far as possible holistic way, including in relation to 2030, based on thorough impact assessments providing a full evaluation of the costs and benefits involved where appropriate.

Reducing emissions where least costly is a key aspect of current policy which is why binding reduction targets only tend to be set on a European and Member State level rather than organisational basis. This retains flexibility to meet targets in the best way possible.

Although EU legislation does not impose specific emission reduction targets on public administrations, further action can still be taken at this level, including through the continued deployment of EMAS which constitutes a common policy for reducing the carbon footprint of the administrative operations of the EU institutions and bodies.

Common reply to recommendation 1(a) and (b)

The Commission does not accept this part of the recommendation, since it does not take account of wider considerations, such as cost effectiveness and specificities across EU institutions and bodies. Such an approach would require evidence on the benefits claimed.

- 107. The Commission intends to increase the monitoring of its GHG emissions under the EMAS scheme.
- 108. The Commission has focussed its efforts on energy consumption of its buildings because it was the biggest GHG emission source where return for investment was the best. The Commission is currently addressing the issue of mobility that is the second major source of its emissions.
- 109. The Commission has not historically used a zero footprint approach for calculating the emissions of its electricity consumption from renewable sources in Brussels. In the EMAS office buildings energy consumption has diminished by 40.5 % between 2005 and 2012 (Brussels, kWh/m2).

Recommendation

Harmonised calculating and reporting of emissions

2. The Commission accepts the recommendation subject to the successful development of the OEF methodology for public administrations. It considers that, through the implementation of EMAS, it

has established a proper way of identifying, measuring and reporting on its most significant direct and indirect environmental impacts, including its GHG emissions. Through EMAS and further inter institutional cooperation, institutions will be in position to have a harmonized approach in calculating their GHG emissions.

- (a) The OEF method, as recommended by the Commission, is currently subject to an extensive pilot-testing until end 2016. The objectives of the pilot phase include the definition of certain technical requirements which will be key to a wide implementation of the method in a complex administration like the Commission. Moreover, the results of the pilot phase will probably lead to a revision/improvement of the OEF method. During this exercise, the Commission has privileged the development of OEF sectorial rules (OEFSRs) for those sectors representing the highest share of environmental impacts. Obviously, the public administration sector is not part of these. After reviewing the results of the pilot phase, once the revised OEF method will be available, the Commission will consider the possibility to launch an internal pilot phase to develop specific sectorial rules for the calculation and reporting of the environmental footprint of the Commission or similar public administrations.
- 110. The EU climate policy or legislation does not indeed foresee obligatory schemes to compensate emissions. The Commission has sought real reductions in emissions via existing policies, including EMAS.

Recommendations

Common approach to voluntary offsetting

3. The Commission accepts this recommendation whilst underlining the voluntary approach and the autonomy of each EU institution and body to decide the appropriateness of such possible offsetting.

Furthermore, the EU climate policy or legislation does not indeed foresee obligatory schemes to compensate emissions. The Commission will continue to seek real reductions in emissions via existing policies, including EMAS.

A common approach to compensate for emissions will also have to take into account: i) the need to avoid discouragement of further efforts to achieve real reductions in emissions, ii) the existing mechanisms including emissions trading, and iii) the availability of reporting regimes and sufficiently high standard offsetting schemes. It will also require an assessment of the effects on EU resources and use of public money.

4. The Commission accepts this recommendation. There is a very wide range of possible offset credits exist of very variable quality.

Rules exist governing the use of offsets for compliance under EU climate legislation, which, for reasons of consistency, should be reflected in any use of offsetting by EU institutions. These rules relate to both the quantity relative to own action and to the type considered of sufficient quality. It is essential for example to ensure that actions used for offsetting are additional, subject to sound monitoring, reporting and verification to minimise the opportunities for fraud and are subject to accounting rules that avoid the possibility of double counting.

The Commission will continue to give first priority to seeking real reductions in emissions via existing policies, including EMAS, while also considering other options such as offsetting.

- 5. The Commission accepts this recommendation, whilst recognising that the benefit for the local population is only one consideration that should be taken into account in the evaluation of the quality of offsets.
- 111. The Commission shares the observation of the Court that the institutions should adopt and/or better use the EMAS scheme.

- 112. EMAS is a strong and demanding management tool and a quick implementation is not compatible with financial limitations of most of the EU institutions. The limitations of the EMAS scope are part of the EMAS system itself. EMAS has to be implemented in a cost-effective and as far as possible holistic way.
- 113. Overall, some kind of GPP is used in the majority of the cases, although many processes are not fully green. Only about a quarter of contracts did not include green criteria. With this result, the institutions are faring better than the average of public authorities in Europe. According to a study (see footnote 1 of the Commission's reply), based on an EU-wide survey, on average 54% of public authorities included some kind of green criterion in their last purchase for 10 priority product groups (Construction, Electricity, Cleaning Products and Services, Textiles, Food and Catering Services, Furniture, Office IT equipment, Paper, Gardening Products and Devices, Transport) in the period 2009-2010.

For most of its building renovation and/or new constructions, the Commission uses generally BREEAM excellent standard which is not only limited to energy performance.

114. The Commission considers further evaluating whether participation in the European Code on Data Centre Energy Efficiency is compatible with the financial perspectives and especially for administrative appropriation.

Recommendations

Full implementation of EMAS and green procurement

6. The Commission accepts this recommendation and fully supports the promotion of the EMAS scheme. Scope limitations are part of the EMAS scheme itself in order to allow each organisation to address the most significant environmental aspects.

The Commission will consider signing the European Code on Data Centre Energy Efficiency after further evaluating if it is compatible with the financial perspectives and especially for administrative appropriation.

7. The Commission accepts this recommendation. The current revision of the FR/RAP sets in place the regulatory framework encouraging further green public procurement including life cycle costing, in line with Directive 2014/24/EU.

The Commission will further develop guidance documents for GPP and promote those documents at the GIME group.