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DELIVERABLE 1.1.: Benchmark Analysis Report

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ABSTRACT / EXECUTIVE SUMMARY

The transition to a circular economy and the drive for sustainable consumption and production practices are integral to the EU's long-term economic and environmental strategies. To reach climate neutrality by 2050, the European Green Deal positions Green Public Procurement (GPP) as a priority instrument to stimulate the uptake of resource-efficient and forward-thinking solutions. The Territorial Agenda 2030 promotes coordinated action across territories that draw on the unique strengths of each region to address shared environmental and social challenges. Macro-regional strategies such as the EU Strategy for the Adriatic and Ionian Region (EUSAIR), the EU Strategy for the Danube Region (EUSDR), and the EU Strategy for the Alpine Region (EUSALP) stress the importance of environmental quality, sustainable development, and cross-border partnerships to enhance competitiveness and resilience. These strategic frameworks all highlight the need for deep systemic change, market-based incentives, and transnational collaboration to advance the circular economy.

Across the ADRION region, spanning both EU Member States and IPA countries, there is a wide variation in how Green Public Procurement is understood and implemented. These differences hinder the progress toward creating a cohesive market for circular economy products and services, due to the wide differences in legal frameworks, implementation, and institutional capabilities across the region. While certain countries have enforced mandatory GPP policies and set protocols, others only promote it voluntarily or have not fully integrated GPP, resulting in uneven application and reduced market access for SMEs competing in sustainable procurement sectors.

To overcome these disparities, the GPP2ADRION project encourages transnational cooperation to unify and strengthen GPP implementation to advance circular economy objectives. The goal is to build a network to promote knowledge sharing, harmonize approaches, support coherent GPP implementation, and strengthen the ability of both SMEs and the wider industry to access green procurement opportunities. Embedding environmental priorities into procurement practices and promoting circular economy principles enables the project to directly support EU ambitions for climate neutrality and efficient resource use. Through these actions, the project seeks to create long-term environmental, social, and economic gains that extend beyond the participating regions.

The Benchmark Analysis Report (Deliverable D.1.1.1) is central to this work, providing information to support policy makers and stakeholders involved in procurement. Coordinated by PP5, with the support of LP, PP8, PP6 and other partners, Activity A1.1 (*State of the Art of Public Procurement procedures and GPP procedures in the regions for circular economy*) included **the development of a unified stakeholder identification process and a cohesive interview framework, incorporating structured interviews, cabinet work, and - as an additional activity in A1.1 - an online survey.**

To ensure consistency, both tools - the interviews and the survey - were developed using a shared content framework, covering common themes across all partner countries. This model has guided project partners (PPs) in mapping and engaging relevant public and private actors involved in public procurement.

Through structured interviews, online survey, and regional analyses, the Benchmark Analysis Report provides:

- A list of stakeholders per each partner country (region);
- Analysis of valid EU GPP regulations for GPP within circular economy framework;
- Results of the selected sections of interviews and the online survey relate to both the regulatory framework and the practical implementation of GPP/PPP;
- Key takeaways, discussion and conclusion on benchmark

The insights gathered from this process, together with those from D1.2 Gap Analysis, provide a strategic foundation for the upcoming phases of GPP2ADRION, supporting policy alignment, capacity-building, and the broader adoption of circular economy principles within public procurement.

In summary, this report offers valuable information to guide the adoption of circular economy principles, foster innovation, and improve the sustainability and competitiveness of SMEs and industry actors across the ADRION region. The findings will directly inform the next steps of WPI and broader, including the development of the Capacity Building Plan and the establishment of GPP Ambassadors, both of which are designed to strengthen stakeholder competencies, promote best practices, and accelerate the uptake of green and circular public procurement across the ADRION region.

INDEX

1. Introduction.....	7
1.2 Purpose of the Benchmark Report.....	7
1.2 Methodology Used	8
2. Stakeholder Identification - Mapping Process and a List of Stakeholders.....	9
2.1 Stakeholder Identification Metrics and Classification.....	9
2.2 An initial list of stakeholders.....	11
3. Stakeholders engagement.....	12
3.1 Purpose and Methods	12
3.2 Interview Framework and Implementation.....	12
3.3. Online Survey framework and implementation.....	15
4. Current GPP procedures in the Region identified through the cabinet work	18
4.1 Analysis of valid EU GPP regulations for GPP within the circular economy framework – cabinet work	18
4.2 Current GPP Procedures in the Region.....	19
5. Current GPP Procedures in the Region: Insights from Stakeholder Interviews...22	22
5.1 Bosnia and Herzegovina	22
5.1.1 State of Art in GPP – Policy and Strategy & Implementation.....	22
5.1.2 Legal and Institutional Framework	22
5.2 Greece.....	23
5.2.1 State of Art in GPP – Policy and Strategy & Implementation.....	23
5.2.2 Legal and Institutional Framework	23
5.3 Italy	23
5.3.1 State of Art in GPP – Policy and Strategy & Implementation.....	23
5.3.2 Legal and Institutional Framework	24
5.4 Montenegro.....	24
5.4.1. State of Art in GPP – Policy and Strategy & Implementation	24
5.4.2 Legal and Institutional Framework.....	24
5.5 North Macedonia.....	25
5.5.1 State of Art in GPP – Policy and Strategy & Implementation.....	25
5.5.2 Legal and Institutional Framework	25
5.6 Serbia	25
5.6.1 State of Art in GPP – Policy and Strategy & Implementation.....	25
5.6.2 Legal and Institutional Framework	25

GPP2ADRION

5.7 Slovenia.....	26
5.7.1 State of Art in GPP - Policy and Strategy & Implementation	26
5.7.2 Legal and Institutional Framework	26
5.8 Regional State of the Art: Comparative Analysis of Participating Countries.....	26
Key Regional Observations that derive from it are as follow:.....	28
5.9 Comparative Table – Project Countries vs. EU Baseline	28
Key Takeaways:.....	30
6. Current State of the Art - Data Collected from Broader Stakeholder Participation	30
7. Implementation & practices	34
7.1 Bosnia and Herzegovina.....	34
7.2 Greece	34
7.3 Italy.....	35
7.4 Montenegro.....	36
7.5 North Macedonia.....	37
7.6 Serbia.....	38
7.7 Slovenia.....	38
7.8 Thematic Analysis across GPP2ADRION Region.....	39
7.9 Highlights and Comparative Insights	40
8. Benchmarking and Comparative Assessment (Interview Results).....	42
8.1 Benchmarking Approach.....	42
8.2 Synthesis of Best Practices and Innovations	43
8.3 Identification of Leading Areas.....	44
9. Conclusions.....	46
9.1 Key Takeaways.....	46
9.2 Overview from Interview Reports.....	46
9.3 Overview from Survey Results	47
9.4 Main Takeaways – Comparative Reflections.....	47
10. Annexes.....	49

LIST OF FIGURE

Figure 1 Steps of Stakeholders Mapping	9
Figure 2 Share of a stakeholder type General representation by stakeholder type.....	15
Figure 3 Percentage of Survey Participants By Organization Type	17
Figure 4 Awareness of EU Guidelines on GPP	31
Figure 5 Existence and Clarity of National GPP Legislation	32
Figure 6 Results on a formal monitoring system.....	33

LIST OF TABLE

Table 1 Stakeholder classification	10
Table 2 Metrics for Stakeholder assessment.....	11
Table 3 Number of Stakeholders Mapped by Country and Type.....	12
Table 4 Overview of Stakeholders Participation in Structured Interviews	14
Table 5 Number of Participants per Country in the Survey.....	16
Table 6 Comparative Analysis of Participating Countries.....	28
Table 7 Comparative Table – Project Countries vs. EU Baseline.....	30

1. Introduction

1.2 Purpose of the Benchmark Report

Overall Purpose of the Benchmark Analysis Report

The Benchmark Analysis Report is a key deliverable of the GPP2ADRION project, aiming to evaluate and map the existing Green Public Procurement (GPP) practices linked to the circular economy currently implemented across the ADRION region. The report's primary goal is to collect and analyze relevant data, map the key stakeholders, assess the current level of GPP implementation, and highlight best practices and gaps within participating countries.

The report offers a comparison across the region, providing meaningful insights to support the alignment and enhancement of GPP practices aligned with circular economy principles. By gathering both qualitative and quantitative data, the Benchmark Analysis Report serves as a basis for evidence-driven policy recommendations, capacity-building activities, and the development of tailored tools and approaches to promote the broader uptake of sustainable procurement.

Scope and Objectives

The report encompasses both EU and IPA countries within the ADRION program area, focusing on:

- Mapping the key stakeholders involved in public procurement in each project country;
- Evaluating the implementation status of GPP in each region;
- Analyzing the alignment of national practices with EU Environmental Criteria;
- Comparing regional findings to facilitate policymaking and enhance practical implementation strategies.

Structure of the Report

The report is structured to present a detailed and collaborative framework:

- Executive summary
- Introduction
- Stakeholder Identification - Mapping Process and a List of Stakeholders
- Stakeholders Engagement - Interviews and online Survey overview
- Regional Analysis of Current GPP Procedures – cabinet work and insights from interviews
- Implementation & practices insights from interviews and Online Survey results
- Benchmarking and Comparative Assessment
- Conclusions and Next Steps

1.2 Methodology Used

The methodology applied combines multiple data collection by all partners and analysis approaches:

- **Partners' contribution:**
 - **Cabinet work:**

Review of relevant documentation, policies, and legislation at both the international (EU) and national levels. All partners contributed on a basis of a common questionnaire that ensured unified approach and comparison of results.
 - **Stakeholders identification, conduction of interviews and online survey:**

All project partners contributed by identifying and engaging regional stakeholders, conducting interviews, and carrying out the online survey. For the interviews, partners prepared consolidated country reports summarizing the findings. A common data collection framework was developed and applied across all regions to ensure consistency, comparability, and coherence of results.
- **Stakeholder engagement:** The stakeholders identified and contacted across the partner regions played a key role in the process, contributing valuable information and perspectives through both the interviews and the online survey. Their input provided insights into current practices, challenges, and opportunities, thereby enriching the evidence base for both the Benchmark Analysis (D1.1.1) as well as for the Gap Analysis (D1.2.1).

Combined, these methods ensure a robust and representative benchmark analysis that lays the foundation for the development of practical tools and strategies in the next phases of the GPP2ADRION project.

2. Stakeholder Identification - Mapping Process and a List of Stakeholders

2.1 Stakeholder Identification Metrics and Classification

Stakeholder identification and engagement represents one of the fundamental pillars of the GPP2ADRION project, given the cross-cutting nature of Green Public Procurement (GPP) and its close connection to public policy, administrative processes, private sector readiness, and civil society oversight. To ensure that the activities and outputs of the project are grounded in realistic and inclusive practices, a structured and methodical stakeholder identification and classification process has been implemented.

This section presents the metrics, logic, and structure behind the identification and categorization of stakeholders relevant to GPP across the ADRION macro-region.

Understanding the Stakeholder Landscape

The initial step in the stakeholder identification process involved understanding GPP as a policy and operational instrument “on paper” – examining national and regional procurement laws, environmental policies, institutional mandates, and existing frameworks for sustainable procurement. This contextual understanding allowed the project partners to map the ecosystem of actors that play direct or indirect roles in the design, implementation, monitoring, and impact of GPP.

It was quickly evident that GPP involves a variety of actors at different levels of governance and sectors of society. The complexity of GPP – which integrates environmental, economic, and social criteria into public procurement – requires engaging stakeholders with diverse mandates, expertise, and interests. These include public authorities, businesses and industry actors, civil society organizations, research and academic institutions, and independent oversight bodies.

Stakeholder Mapping Framework and Metrics

To support a unified approach across all partner countries, the project adopted a common approach and *Metrics for Stakeholder Identification and Classification*. The process followed these steps:



Figure 1 Steps of Stakeholders Mapping

GPP2ADRION

1. **Applying common metrics** – A shared framework was used to classify stakeholders according to their influence and interest in GPP and circular economy.
2. **Guiding questions** – Three key questions informed the mapping process:
 - Who are the stakeholders involved in each phase of the GPP process?
 - How are they involved?
 - What is their level of involvement and impact?
3. **Data collection** – Relevant information on each stakeholder’s role, potential engagement, and contact details was gathered.
4. **Mapping** – Stakeholders were positioned on an influence–interest grid based on the collected data.
5. **Recording** – All findings were compiled using the common template to ensure consistency and comparability across countries.

This framework enabled each country team to systematically identify actors involved in GPP policy development, procurement planning, tender drafting and evaluation, supplier engagement, audit and monitoring, and capacity building.

The stakeholder mapping exercise classified stakeholders into the following main types:

TYPE OF A STAKEHOLDER	INSTITUTIONS, ORGANIZATIONS
PUBLIC AUTHORITIES	Ministries (economy, environment, climate, finance, public administration), regional and municipal governments, regional development agencies, state audit institutions, public-private partnership commissions, anti-corruption agencies.
BUSINESSES AND BUSINESS ORGANIZATIONS	Chambers of Commerce, business associations, and individual companies participating in public procurement, strategic sectoral networks (e.g., SRIP for Circular Economy in Slovenia)
CIVIL SOCIETY	Non-governmental organizations and advocacy groups that promote transparency, social equity, environmental sustainability, environmental education.
RESEARCH AND ACADEMIA	Universities, policy think tanks, and research institutions or experts with a focus on procurement, sustainability, or circular economy.

Table 1 Stakeholder classification

Once the initial identification and classification were complete, project partners advanced to further prioritization phase. Each stakeholder identified was evaluated based on its relevance and potential contribution to the project objectives, particularly in terms of enhancing GPP implementation and integrating circular economy principles. This involved an assessment guided by two main criteria:

- **Level of Influence:** The stakeholder’s ability to shape or enforce GPP policies, frameworks, and practices.
-

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- **Level of Interest:** The stakeholder’s motivation to participate in or benefit from GPP, either through compliance, advocacy, implementation, or economic opportunity.

These two dimensions gave rise to a four-quadrant matrix: this classification helped the project teams focus their interviews and engagement strategies on High Interest – High Influence and High Interest – Low Influence groups, ensuring both top-down policy engagement and bottom-up implementation feedback.

Interest / Influence	High Influence	Low Influence
High Interest	Ministries of Economy, Environment, PPP Offices, Anti-Corruption Agencies	Chambers of Commerce, NGOs, Business Associations, Universities
Low Interest	Ministry of Finance	Media, Trade Unions

Table 2 Metrics for Stakeholder assessment

2.2 An initial list of stakeholders

Stakeholders Mapped by Country and Type

A total of 190 stakeholders were mapped across seven project countries, with the largest share coming from Public Institutions (58), followed by Businesses (29) and University/Academia (24). The least represented groups were Experts (2) and Others (9).

Country	Public Ministry	Public Institution	National / Regional Agency	Business organization	Businesses	Civil society/ NGO	Expert	University/ Academia	Other*	Total
North Macedonia	4	16	1	3	2	1	-	1	-	28
Serbia	2	17	1	1	4	1	-	1	-	27
Montenegro	2	3		1			-		1	7
Italy	2	5	3	3	5	2	1	13	2	36
Greece	5	5	-	3	6	1	-	4	2	26

GPP2ADRION

Bosnia and Herzegovina	2	3	2	1	7	3	-	1	-	19
Slovenia	9	7	10	3	8	3	1	4	2	47

Table 3 Number of Stakeholders Mapped by Country and Type

The **description of the stakeholder mapping** approach is presented in **Annex C** and **list of stakeholders** identified in A1.1 and A1.2 is provided in **Annex B.**

3. Stakeholders engagement

3.1 Purpose and Methods

The engagement of stakeholders in the GPP2ADRION project aimed to gather first-hand insights on the current state of Green Public Procurement (GPP) and Circular Public Procurement (CPP) practices across the ADRION region. This process contributed to both the Benchmark Analysis (D1.1) and additionally to the Gap Analysis (D1.2).

Stakeholder identification was conducted through a common mapping process by all project partners (PPs). Based on this, each partner selected contacts for:

- Structured interviews with a targeted group of key stakeholders, and
- An online survey distributed to a broader group of respondents.

Although not originally foreseen in the application under A1.1, the decision to implement an online survey alongside structured interviews allowed the project to gather a more comprehensive set of perspectives. This dual-method approach allowed the project to collect both qualitative and quantitative data, reflecting institutional realities, operational challenges, and opportunities for future engagement. Some content naturally overlapped with desk research activities ("cabinet work") and contributed to cross-validation of findings across methods.

Based on the common approach, each partner country identified contacts that were used in the first project phase for two complementary actions: structured interviews and an online survey.

The interviews were designed to gather in-depth qualitative insights from selected stakeholders, while the survey aimed to collect broader, quantitative data on specific GPP-related issues, both for the state-of-the-art analysis and for the gap analysis (further discussed in deliverable D1.2).

3.2 Interview Framework and Implementation

Stakeholder Interview Dimensions and Link to Classification

Structured interviews were used to gain deeper qualitative insight into the practical experiences, challenges, and needs of stakeholders involved in GPP and CPP. Each PP

GPP2ADRION

selected a group of 5–10 stakeholders representing different roles, sectors, and levels of influence. Each project partner targeted different types of stakeholders, selected to reflect different roles and varying levels of influence and interest. Interview questions were tailored accordingly and addressed:

- Awareness and knowledge of GPP and the circular economy.
- Understanding of their organization's role in the GPP process.
- Perspectives on implementation challenges.
- Presence of monitoring tools, KPIs, and best practices.
- Training and capacity-building needs.

The responses gathered enriched both the Benchmark Analysis and the Gap Analysis, grounding the findings in lived experience, institutional realities, and concrete operational knowledge.

Stakeholders for interviews were selected based on their relevance, influence, and interest in GPP/PPP, and were categorized using a mapping matrix, as defined in previous chapter. Based on that, each partner was required to:

- select a balanced group of 5–8 stakeholders for interviews from diverse sectors and categories
- share the selected list with the WPI team before conducting interviews

Interview Topics

A standardized questionnaire was used to ensure consistency and comparability across partner countries. The interview tool was structured around four key sections that would cover the needs of A1.1 and A1.2:

- 1) **State of the Art** – Current awareness and implementation of PP/GPP/PPP.
- 2) **Benchmarking** – Procedures, practices, and alignment with national/EU frameworks.
- 3) **Barriers and Challenges** – Gaps, limitations, and difficulties in implementation.
- 4) **Opportunities and Needs** – Capacity-building needs, engagement potential, and good practices.

Interview Implementation

The interviews followed a two-phase process:

- **Announcement of the interview with description to explain** the project and the purpose of the interview.
- **Formal invitation with a questionnaire/interview questions** to allow preparation before the meeting

The interviews were scheduled proactively, preferably during the first informal phone call to avoid delays. Each partner conducted at least 5 interviews with different types of stakeholders.

The interviews were conducted in-person or - mostly - online to ensure accessibility and efficiency.

Participation in Interviews

A total of 63 stakeholders were interviewed across all seven participating countries.

Interviews targeted a mix of stakeholder groups, including public authorities at national and local levels, industry and SMEs, academia/research institutions, and other relevant actors.

The data in Table 4 reflects the total number of stakeholders interviewed, the distribution per country, and the composition by stakeholder type.

This statistical overview provides the foundation for the benchmark analysis that follows.

Country	Total Stakeholders Interviewed	Public authority-national level (PA-N)	Public authority and administration - regional/local level (PA-R&L)	Industry & SMEs (I & SME)	Academia & Research organisations (A & RO)	Others
North Macedonia	10	0	4	3	2	1
Serbia	10	2	2	4	2	0
Montenegro	8	3	0	3	1	1
Italy	9	1	4	1	2	1
Greece	5	0	2	1	1	1
Bosnia and Herzegovina	12	2	3	4	2	1
Slovenia	9	1	2	2	2	2

Table 4 Overview of Stakeholders Participation in Structured Interviews

General representation by stakeholder type:

- Highest participation: Industry/SMEs (18 interviews / 28.6%)
- Second highest: Regional/local authorities (17 interviews / 27.0%)
- Third: Academia/Research (12 interviews / 19.0%)
- Relatively low representation: Public national authorities (9 interviews / 14.3%)
- Least represented: Others (7 interviews / 11.1%)

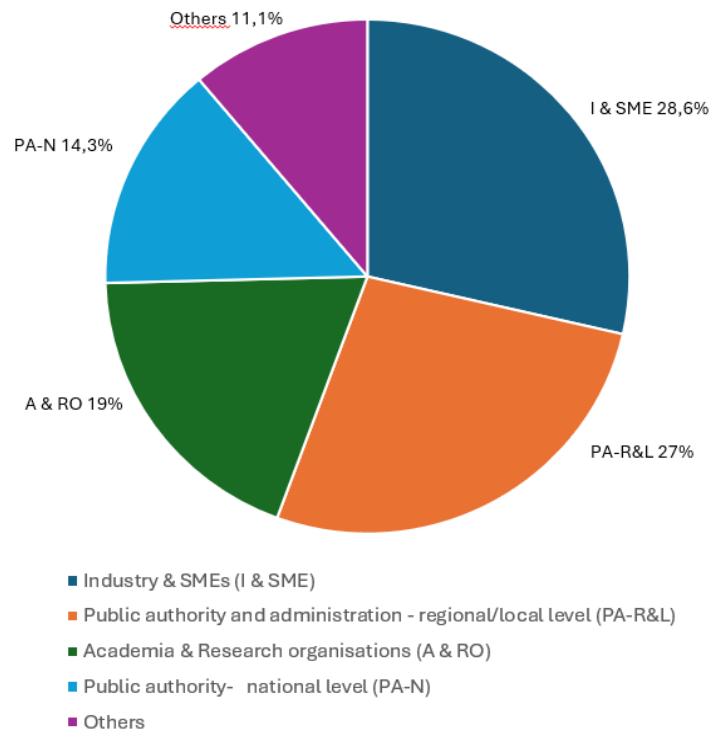


Figure 2 Share of a stakeholder type General representation by stakeholder type

Each PP summarized the interviews using a common Stakeholder Report Template, reporting main insights in English. Interviewees were informed about how their input would contribute to the project and thanked them for their participation. The knowledge gathered feeds into future project activities such as capacity-building programmes, policy recommendations, and communication actions.

3.3. Online Survey framework and implementation

Online Survey Purpose and Dimensions

To complement the interviews with broader outreach, an online survey was conducted for both – A1.1 and A1.2. activities. Unlike the interview process, which required a face-to-face in-person or online interview lasting around 45 minutes—therefore demanding a significant time commitment—we opted for an online questionnaire, easily accessible via a link, with an estimated completion time of 10 minutes. The survey was hosted on the LimeSurvey platform, managed by the University of Padua (the Lead Partner). This platform was chosen because it ensured privacy and proper data management.

The objective was to capture wider quantitative input across the ADRION region on issues including GPP implementation, barriers, and training needs. While the interviews offered depth, the survey provided breadth and comparability.

Considering the format, the survey aimed to reach a larger number of participants. For the survey, each project partner (PP) was asked to reach at least 20 respondents per country, inviting all mapped contacts to participate.

Topics of the Survey Questionnaire and Implementation

The survey consisted of 18 questions grouped into four thematic blocks:

- Participant Information – Country, organization type, and role.
- GPP Implementation – Barriers, needs, and priority areas.
- Training and Capacity Building – Interest in future learning opportunities.
- Engagement Opportunities – Willingness to take part in further project activities.

Survey dissemination was supported by a coordinated process:

- All PPs aligned on the structure and translation of the survey.
- An invitation letter was prepared and shared by email, containing the survey link, privacy notes, and project background.
- Only completed responses were accepted for analysis.

Participation in Online Survey

Only fully completed surveys were considered valid, resulting in a total of 133 responses. All partner countries were represented in the final dataset. The following statistics illustrate the distribution by country and type of organization:

COUNTRY	COUNT (N)	%
GREECE	33	24.81%
SERBIA	26	19.55%
SLOVENIA	25	18.80%
NORTH MACEDONIA	19	14.29%
ITALY	12	9.02%
BOSNIA AND HERZEGOVINA	10	7.52%
MONTENEGRO	8	6.02%
TOTAL	133	100%

Table 5 Number of Participants per Country in the Survey

Greece accounted for the largest share of responses (24.81%), followed by Serbia (19.55%) and Slovenia (18.80%). Italy, North Macedonia, Bosnia and Herzegovina, and Montenegro also contributed with varying response rates. It is worth noting that lower response numbers in countries such as Montenegro and Bosnia and Herzegovina correlate with a lower level of institutional familiarity with GPP, highlighting the challenges of engaging stakeholders in regions where the instrument is still underdeveloped.

This geographical distribution provides a useful overview of stakeholder engagement across the ADRION region. To complement this, the data were also analyzed by type of organization, in order to better understand the institutional profile of the respondents and assess the diversity of perspectives represented in the survey, results are summarized in the graph below.

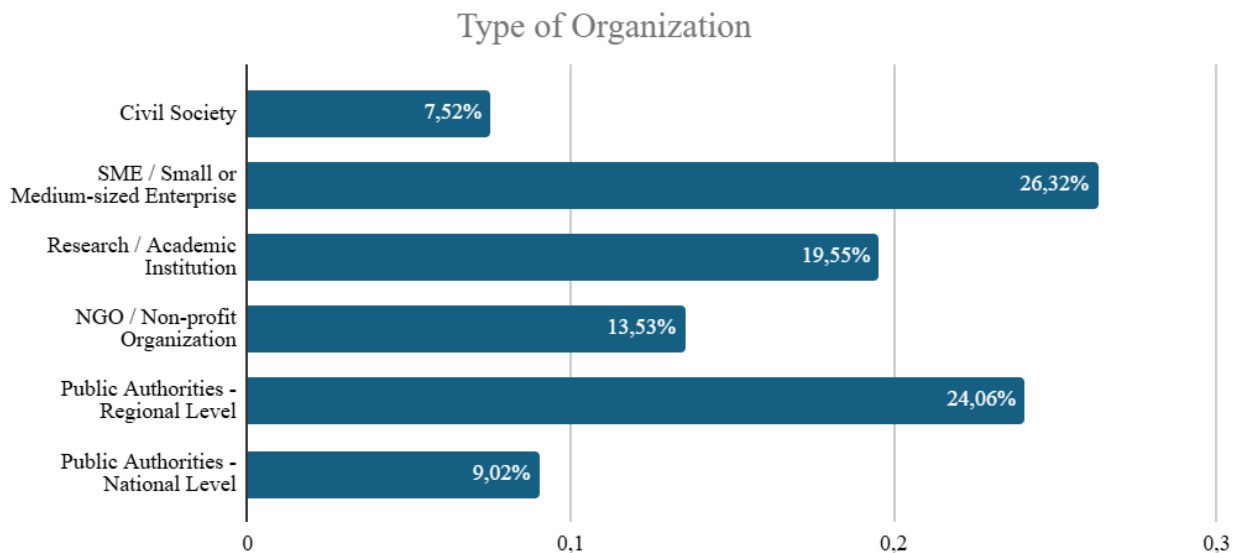


Figure 3 Percentage of Survey Participants By Organization Type

In terms of organizational type, the largest group of respondents were representatives from small and medium-sized enterprises (SMEs), accounting for 26.32% of the total. Regional-level public authorities followed with 24.06%, reflecting their key role in GPP implementation at subnational level. Research and academic institutions (19.55%) and non-profit organizations (13.53%) also had a strong presence, while national-level authorities (9.02%) and civil society organizations (7.52%) rounded out the respondent pool.

Overall, the survey achieved broad geographical and institutional coverage, although some differences in stakeholder participation remain. These disparities provide useful context for understanding the level of GPP awareness and readiness across the region. In particular, the lower engagement rates in some countries may point to structural barriers, such as limited policy frameworks or lack of institutional capacity, which will be further explored in the subsequent phases of the project

4. Current GPP procedures in the Region identified through the cabinet work

4.1 Analysis of valid EU GPP regulations for GPP within the circular economy framework – cabinet work

The implementation of Green Public Procurement (GPP) and the integration of Circular Economy (CE) principles vary significantly across EU regions, reflecting differences in legal frameworks, political commitment, and market maturity. A first regional assessment of GPP procedures was conducted during the initial phase of the project through dedicated cabinet work, primarily carried out by LP, PP5, and PP8. This activity consisted of analyzing the EU Commission's regulatory references on GPP and undertaking a bibliographic review of each partner country's legislative situation. The process was further enriched by a structured exchange among project partners, supported by a systematic questionnaire aimed at evaluating the extent of GPP implementation and the incorporation of CE principles into procurement criteria across seven project countries: Italy, Slovenia, Greece, Serbia, Bosnia & Herzegovina, Montenegro, and North Macedonia. The report covers GPP adoption rates, CE integration, product specifications, and key barriers observed in each context.

The questionnaire was designed to:

- Assess the current state of GPP implementation in project countries.
- Identify the adoption of Circular Economy principles.
- Map GPP product criteria and analyze implementation gaps.
- Highlight barriers hindering GPP execution.
- Provide foundational knowledge as a starting point for further project activities.

It is important to emphasize that this document does not represent the final state-of-the-art outcome nor a comprehensive gap analysis. Rather, it should be regarded as a preliminary assessment, intended to collect baseline information from each partner country, serving as a stepping stone for subsequent activities under the GPP2ADRION project.

Green Public Procurement within the EU Framework

Green Public Procurement (GPP) is a voluntary instrument adopted by public administrations to prioritize the procurement of goods, services, and works with reduced environmental impact throughout their life cycle. Defined in the European Commission's Communication COM(2008)400 *Public Procurement for a Better Environment*, GPP is described as "a process whereby public authorities seek to procure goods, services, and works with a reduced environmental impact throughout their life cycle compared to goods, services, and works with the same primary function." Public procurement is a strategic policy tool, representing approximately 1.8 trillion euros annually (around 14% of

GPP2ADRION

EU GDP), giving governments a unique capacity to influence markets, promote sustainable practices, and stimulate innovation.

The EU has progressively strengthened the legal framework supporting GPP, notably through:

- 2008 GPP Communication (COM-2008-400): the foundational guidelines for integrating environmental sustainability into procurement processes.
- Revised Public Procurement Directives (2014/23/EU, 2014/24/EU, 2014/25/EU): enabling contracting authorities to include environmental criteria, life-cycle assessments, and sustainability-focused award criteria.
- 2020 Circular Economy Action Plan (CEAP): reinforcing GPP as a key driver for the uptake of circular products and services, stimulating demand for reuse, recycling, and resource-efficient solutions.

To operationalize these principles, the European Commission has developed sector-specific GPP criteria, covering areas such as IT equipment, furniture, construction, cleaning services, textiles, and transport. These criteria are based on scientific data, regularly updated, and designed to minimize environmental impacts while fostering a sustainable market transformation. While GPP adoption remains voluntary at the EU level, some Member States, such as Italy and Slovenia, have made certain green criteria mandatory within specific sectors.

The integration of CE principles into GPP occurs both in the pre-procurement phase—where authorities assess needs and explore alternatives such as leasing, reuse, or repair—and in the procurement phase, where criteria such as durability, recyclability, take-back schemes, and low-carbon performance are applied. By embedding CE considerations, public authorities can reduce waste, extend product lifecycles, and support circular business models.

Despite its strong potential, challenges remain, including limited awareness among procurement officers, uneven implementation across Member States, and insufficient market readiness for circular products. Nevertheless, GPP remains a critical tool in the EU's transition towards a greener and more circular economy, leveraging public expenditure to drive systemic change.

4.2 Current GPP Procedures in the Region

The findings from the partner study and consultation are presented in this chapter. They reveal a diverse landscape, with varying levels of adoption, regulatory frameworks, and institutional capacities across these countries.

Recognized State of the Art

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Italy and Slovenia are frontrunners in GPP implementation, having made significant strides in embedding GPP criteria and integrating CE principles into public procurement processes. Both countries have developed national action plans, provided training for procurement officers, and established clear guidelines for applying GPP criteria. Their experiences highlight the feasibility and benefits of embedding sustainability into public procurement. Italy and Slovenia's efforts demonstrate that GPP, when mandated and supported by strong regulatory frameworks, can drive the transition to more sustainable and circular procurement practices.

In contrast, countries like Greece, Serbia, and Bosnia & Herzegovina exhibit partial adoption of GPP, facing operational and institutional challenges, including limited awareness of the benefits of GPP, insufficient training, and fragmented governance structures. While GPP is often considered, its implementation remains voluntary, which impedes its broader adoption. Montenegro and North Macedonia are further behind, with minimal policy frameworks and low market readiness for circular products and services. The lack of strong regulatory support, combined with an underdeveloped market for circular products, presents significant obstacles to fully implementing GPP in these regions.

Key barriers

A detailed questionnaire conducted in the project countries highlighted several key barriers hindering the integration of GPP and CE principles:

- **Lack of Regulatory Frameworks:** Many countries, particularly Serbia, Bosnia & Herzegovina, and North Macedonia, reported the absence of comprehensive national regulations for GPP and CE integration. Without a solid regulatory foundation, public procurement authorities struggle to incorporate sustainability criteria into their processes. Even in countries like Montenegro, where interest in GPP exists, the absence of legally binding guidelines leads to a fragmented and inconsistent implementation of GPP policies.
- **Limited Training and Knowledge:** A critical barrier identified across many countries is the lack of expertise and training for procurement officers. While countries like Italy, Slovenia, and Greece have made progress in GPP adoption, procurement officers still face challenges in effectively applying GPP criteria due to gaps in technical knowledge and understanding of CE principles. In Serbia, Bosnia & Herzegovina, and North Macedonia, procurement officers often lack the capacity to integrate CE principles into procurement decisions, hindering effective GPP implementation.
- **Low Awareness of GPP Benefits:** In several countries, especially Greece and Serbia, there is limited awareness among public officials and private sector stakeholders about the long-term environmental and economic benefits of GPP. Procurement decisions are often driven by immediate cost-efficiency rather than the long-term

GPP2ADRION

sustainability goals that GPP can offer. This limited recognition of the value of GPP and CE leads to reluctance in adopting green criteria, even when they are available.

- **Insufficient Market Readiness:** The market for circular products remains underdeveloped, especially in countries like Montenegro and North Macedonia, making it difficult for public authorities to procure products that meet GPP and CE criteria. This market gap is exacerbated by the lack of investment in green technologies and the higher costs associated with circular products, which are often more expensive than traditional alternatives. Public procurement authorities thus face the challenge of balancing sustainability goals with budget constraints.
- **Inconsistent Enforcement:** Even in Italy and Slovenia, where GPP frameworks are more advanced, inconsistent enforcement remains a significant issue. In these countries, while GPP is mandatory for certain sectors, public authorities may not always enforce the use of green criteria, particularly when faced with challenges like budget cuts, political pressure, or a lack of clear accountability mechanisms. The absence of monitoring and reporting systems further complicates the implementation of GPP policies.

Key Takeaways

Despite these challenges, GPP remains a critical tool for advancing the circular economy in public procurement. The key to overcoming these barriers lies in addressing the regulatory gaps, improving training programs for procurement officers, and fostering market development for circular products. Strengthening collaboration among stakeholders, including public authorities, businesses, and civil society, will be essential for ensuring a more harmonized approach to GPP implementation across the region.

In conclusion, while considerable challenges remain for the full implementation of GPP and CE principles in the project countries, GPP remains a key mechanism for driving the transition toward a circular economy. By addressing the identified barriers and focusing on capacity-building, market readiness, and improved regulatory frameworks, the project countries can overcome these challenges and advance toward more sustainable and circular public procurement practices.

The complete and comprehensive results are presented in the document: **“Analysis of EU GPP Criteria: Opportunities and Challenges for Circular Economy”** present in Annex A.

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5. Current GPP Procedures in the Region: Insights from Stakeholder Interviews

This section provides country-specific analyses for each GPP2ADRION partner country, based on interview data and desk research on policy, legal frameworks, and implementation challenges.

This "National State of the Art" section provides structured insights into the status of GPP in each partner country: Slovenia, Serbia, Montenegro, Bosnia and Herzegovina, Italy, Greece, and North Macedonia. Each country profile focuses on two interrelated dimensions:

- 1) Policy and Strategy & Implementation – A description of the strategic importance of GPP in national planning, the level of political commitment, and actual implementation status, with attention to sectoral practices and barriers.
- 2) Legal and Institutional Frameworks – An overview of national legal bases, institutional responsibilities, and the maturity of supporting tools such as guidelines, monitoring systems, and compliance mechanisms.

5.1 Bosnia and Herzegovina

5.1.1 State of Art in GPP – Policy and Strategy & Implementation

Bosnia and Herzegovina (BiH) presents a highly fragmented procurement landscape due to its complex administrative structure. GPP is not systematically implemented and remains a marginal practice. The Strategy for Environmental Protection (2018–2028) refers to sustainable procurement but lacks actionable measures.

Interview data shows that only a few institutions, primarily in urban centers or at state-level agencies, have piloted GPP initiatives. Most contracting authorities are unfamiliar with environmental criteria, and GPP is rarely prioritized unless explicitly requested by donors or international organizations.

5.1.2 Legal and Institutional Framework

BiH's **Public Procurement Law** (amended in 2019) includes provisions for green criteria, following EU directives. However, due to administrative fragmentation (entities, cantons, Brčko District), implementation varies widely. The **Public Procurement Agency of BiH** provides procedural oversight but has no mandate for environmental policy.

Environmental agencies at entity level have limited interaction with procurement bodies, and the absence of a national GPP strategy or coordinating institution is a major gap. Legal provisions exist but are rarely applied in practice.

5.2 Greece

5.2.1 State of Art in GPP – Policy and Strategy & Implementation

Greece has gradually improved its GPP framework through successive national strategies, the latest being the GPP Action Plan 2021–2025. While GPP is not yet mandatory across all sectors, implementation has increased in energy, waste management, and construction.

Interviews indicate progress in central administration and large municipalities, supported by the Green Fund and EU-funded technical assistance. However, practical application remains inconsistent due to capacity gaps at regional and local levels.

5.2.2 Legal and Institutional Framework

Greece's legal framework aligns with EU directives through the Law on Public Procurement (Law 4412/2016). The overarching responsibility for Green Public Procurement (GPP) lies with the Ministry of Development and Investments, via its General Secretariat of Commerce and Consumer Protection—specifically, the General Directorate for Public Procurement. This authority acts as the leading entity in shaping national GPP policy and drafting the National Action Plan in line with EU directives. Moreover, a dedicated Committee for Green Public Procurement plays a central coordinating role. This interministerial committee comprises representatives from the: Ministry of Development and Investments; Ministry of Environment and Energy; Ministry of Infrastructure and Transport; Ministry of the Interior; Ministry of Health; and Hellenic Single Public Procurement Authority (SPPA). Its key duties include preparing the action plan, adopting environmental criteria (including EU-aligned ones), monitoring implementation, and promoting awareness among contracting authorities and economic operators. Additionally, the Single Public Procurement Authority (SPPA) is an independent administrative authority in Greece responsible for supervising, coordinating, and monitoring the public procurement system across all contracting authorities. It was established to ensure that public procurement in Greece complies with EU directives and national legislation, and to promote transparency, efficiency, competition, and integrity in the award of public contracts. Green criteria are available for selected categories, and training programs are expanding. Challenges include the absence of centralized eco-labeling standards, limited interministerial coordination, and weak compliance monitoring. However, political support for GPP has increased since 2020, particularly in the context of climate and recovery strategies.

5.3 Italy

5.3.1 State of Art in GPP – Policy and Strategy & Implementation

Italy is a frontrunner in Green Public Procurement (GPP) within the European Union, having established a mandatory GPP framework through the National Action Plan on GPP (PAN GPP). This plan defines environmental criteria for over 20 product groups, and public procurement contracts above specified thresholds are required to incorporate these criteria. Italy has effectively integrated European standards into its national

GPP2ADRION

framework through the “CAM: Criteri Ambientali Minimi” (Minimum Environmental Criteria), ensuring compliance with EU regulations.

The implementation process is robust, with a strong legislative foundation and active promotion of sustainable procurement practices. Interviews with public authorities reveal their familiarity with circular economy principles, enabling them to apply these criteria operationally in tenders. Some difficulties however have emerged.

5.3.2 Legal and Institutional Framework

Italy's Procurement Code (Legislative Decree 50/2016) mandates the use of Minimum Environmental Criteria (CAM: Criteri Ambientali Minimi) for specified product groups. The Ministry for Environment and Energy Security defines and updates CAMs.

Monitoring and enforcement mechanisms are not in place. However some voluntary initiative exists, including annual reports and dedicated portals. The Italian model offers best practices for the ADRION region, particularly in the integration of CE principles and lifecycle costing.

5.4 Montenegro

5.4.1. State of Art in GPP – Policy and Strategy & Implementation

Montenegro has recognized GPP as a tool for environmental policy but has yet to fully institutionalize its application. The Strategy for Sustainable Development (2020–2030) includes GPP-related objectives, but their integration into procurement systems is nascent. Awareness of GPP remains low, particularly among municipal authorities.

According to interviews, GPP is seen as an “additional burden” rather than a strategic tool. Some public entities have included energy efficiency requirements in tenders, often linked to donor-funded initiatives. Yet, these are exceptions rather than standard practices.

5.4.2 Legal and Institutional Framework

Montenegro's Law on Public Procurement (2020) permits the inclusion of environmental criteria but does not mandate them. The Public Procurement Directorate oversees procedures but lacks a specific GPP unit. Inter-agency coordination is limited, and there is no central database or registry to track GPP activities.

The institutional gap is further exacerbated by the absence of certified environmental assessment methodologies or circularity indicators in procurement templates. Stakeholders highlight the need for clear, binding rules and capacity-building measures.

5.5 North Macedonia

5.5.1 State of Art in GPP – Policy and Strategy & Implementation

North Macedonia has adopted GPP as part of its commitments under the EU accession process and the Green Agenda for the Western Balkans. However, the practice remains voluntary and is only partially implemented.

Interviewees noted that most contracting authorities are not systematically applying GPP, though pilot projects in waste management and public lighting show potential. A revised Public Procurement Strategy (2022–2026) includes GPP promotion, but operational guidance is still missing.

5.5.2 Legal and Institutional Framework

The Law on Public Procurement (2019) allows environmental criteria, in line with EU directives. The Public Procurement Bureau oversees procedures but lacks a specialized GPP unit. Ministries and municipalities are required to consider GPP, but compliance is not enforced.

There is no national database to track green tenders, and few officials have received formal GPP training. Institutional responsibility is fragmented, with no central body accountable for CE integration into procurement.

5.6 Serbia

5.6.1 State of Art in GPP – Policy and Strategy & Implementation

Serbia is in the early stages of GPP adoption. The current National Public Procurement Strategy (2019–2023) references sustainability, but green criteria are not widely implemented in practice. Efforts to align with EU standards are visible, especially under IPA-funded capacity-building projects. However, implementation remains fragmented and voluntary.

Interviewees noted the lack of harmonized guidance and a clear roadmap for integrating GPP into mainstream procurement. Pilot cases exist, mainly in energy efficiency or international donor-funded procurements, but public sector buy-in is low. Technical knowledge is also lacking, particularly at the municipal level.

5.6.2 Legal and Institutional Framework

Serbia's Public Procurement Law (PPL, 2019) transposes key elements of EU Directives, allowing the use of environmental criteria. However, GPP is not mandatory, and sector-specific criteria have yet to be developed. The Public Procurement Office (PPO) is the central authority, but does not currently monitor green procurement levels.

The Ministry of Environmental Protection has limited influence on procurement policy. The lack of binding legal instruments and absence of eco-labeling schemes hinders GPP implementation. Institutional coordination is weak and reporting on GPP is practically non-existent.

5.7 Slovenia

5.7.1 State of Art in GPP - Policy and Strategy & Implementation

Slovenia has made notable progress in embedding Green Public Procurement (GPP) principles within its national procurement strategies. The country has established a strong policy foundation, with GPP being mandatory for a broad range of product and service categories since 2009. These obligations are outlined in various government decrees, aligning procurement practices with the EU GPP framework and Slovenian environmental policy objectives.

The strategy emphasizes energy-efficient products, sustainable construction, and responsible resource use. Public authorities, especially at the central level, have adopted GPP in everyday procedures. However, full integration at the local level is inconsistent. Several municipalities are lagging behind in terms of awareness and capability, while others have introduced model procurement clauses and tools.

Implementation is supported by guidelines issued by the Ministry of Environment and Spatial Planning. Still, interviews indicate that lack of personnel training and technical knowledge remains a key bottleneck. Successful examples include procurement in the construction and transport sectors, where clear environmental criteria were embedded in technical specifications.

5.7.2 Legal and Institutional Framework

Slovenia's legal framework for GPP is based on the Public Procurement Act (ZJN-3), which incorporates EU Directives 2014/24/EU and 2014/25/EU. The Decree on Green Public Procurement defines minimum mandatory GPP requirements for 11 product groups. The Ministry of Public Administration is responsible for overseeing implementation, while the Ministry of the Environment plays an advisory and promotional role.

Interinstitutional collaboration exists, though it requires strengthening to ensure uniform practices and improve the monitoring and reporting system for GPP implementation. Municipalities have wide discretionary power, resulting in disparities across regions.

5.8 Regional State of the Art: Comparative Analysis of Participating Countries

To understand the regional landscape of Green Public Procurement (GPP) across the ADRION partner countries, this section synthesizes the national profiles into a comparative overview. It highlights similarities and differences in policy maturity, implementation, and institutional frameworks, providing a clear view of where each country stands and the shared regional challenges and opportunities.

Country	Policy Commitment to GPP	Implementation Status	Legal Mandate for GPP	Institutional Maturity	Capacity Gaps Identified
Italy	High – GPP is mandatory in many sectors under PAN GPP	Advanced – GPP integrated into national and regional tenders	Strong – Legislative Decree 50/2016 mandates environmental criteria	Mature – Multiple institutions (Ministry, CONSIP) lead and monitor	Low – Well-developed tools, though SMEs still need support
Slovenia	High – GPP mandatory since 2009	Moderate – Strong at national level, weaker at local levels	Medium-Strong – GPP criteria mandated in several product categories	Intermediate – Guidelines and ministry oversight	Medium – Uneven application and limited local training
Greece	Medium-High – National Action Plan adopted in 2021	Moderate – Progress in key sectors (construction, energy)	Medium – GPP mandatory in certain categories	Improving – SPPA provides guidance; tools expanding	High – Lack of tools (LCC, templates), inconsistent regional uptake
North Macedonia	Medium – GPP mentioned in Public Procurement Strategy (2022–2026)	Low – Few pilot initiatives, mostly donor-driven	Medium – Legal basis exists; not enforced	Weak – No central GPP body	High – Lack of training, tools, and institutional coordination
Serbia	Low-Medium – GPP referenced in strategy, not actively pursued	Low – Few practical applications, mostly donor-supported	Weak – Environmental criteria permitted, not standardized	Weak – No GPP monitoring or specialized authority	High – Awareness, regulatory, and technical knowledge gaps
Montenegro	Medium – Strategy for Sustainable Development	Low – Pilot practices in energy; otherwise minimal	Weak – GPP allowed but not required	Weak – Poor inter-agency coordination	High – Lack of staff expertise, tools, and legal clarity

GPP2ADRION

	references GPP				
Bosnia & Herzegovina	Low – Fragmented system, no national GPP strategy	Very Low – GPP rarely practiced, even with legal possibility	Weak – Permissive legal framework, no mandates	Very Weak – Administrative complexity hinders coherence	Very High – Structural, legal, institutional, and knowledge gaps

Table 6 Comparative Analysis of Participating Countries

Key Regional Observations that derive from it are as follow:

- **Italy stands out** as the only country with mandatory GPP application across sectors, a national monitoring system, and extensive institutional infrastructure.
- **Slovenia and Greece** demonstrate relatively higher commitment and structured legal foundations but still face inconsistencies at local levels.
- **The Western Balkan countries** (Serbia, Montenegro, North Macedonia, and BiH) have enabling laws in place but lack mandates, tools, or clear institutional accountability for GPP.
- **A shared regional weakness** is the limited availability of practical tools (such as life-cycle costing calculators or green criteria templates), combined with a widespread lack of training and awareness across all stakeholder groups.
- **Fragmentation and lack of political will** are key bottlenecks in non-EU ADRION countries, whereas EU members benefit from stronger institutional and legislative push.

This comparative snapshot supports the project's transnational objective: to harmonize knowledge levels, promote mutual learning, and design targeted capacity-building programs addressing each country's specific gap.

5.9 Comparative Table – Project Countries vs. EU Baseline

The following analysis contrasts the aggregated status of GPP procedures in the GPP2ADRION partner countries with the baseline defined by the European Commission's GPP guidance. This allows benchmarking of where ADRION stands regionally in relation to the EU's expectations and best practices.

Benchmark Category	EU Baseline	Project Countries (Aggregate)	Key Gaps / Deviations
Legal Mandate	EU promotes voluntary GPP with movement toward minimum mandatory requirements in CEAP	Only Italy has mandatory GPP; others allow it but rarely require it	Lack of enforcement in most ADRION countries
Scope of GPP Criteria	EU defines comprehensive criteria across 20+ product/service categories	Limited adoption – most countries cover <5 categories	Incomplete or missing national criteria sets
Integration into Procurement	MEAT (Most Economically Advantageous Tender) + Life Cycle Costing promoted by 2014 Directives	Italy, Greece, Slovenia apply MEAT; others default to lowest price	Misuse or underuse of LCC and sustainability in award criteria
Monitoring & Reporting	EU encourages systematic reporting on GPP uptake and outcomes	Only Italy and to a lesser extent Greece report on GPP; others lack any tracking	No national GPP databases or KPI systems in most countries
Institutional Coordination	EU model emphasizes inter-ministerial coordination and dedicated GPP support bodies	Italy and Slovenia show good coordination; others are fragmented	Lack of a dedicated GPP authority in 5 of 7 partner countries
Stakeholder Engagement	EU promotes early market dialogue, SME access, and training	Stakeholders are often unaware or untrained (esp. SMEs, municipalities)	Capacity-building needs remain unmet across the region
Circular Economy Linkage	Strong GPP-CE alignment promoted under CEAP and Green Deal	Conceptually recognized in most strategies but weakly operationalized	CE principles rarely translated into practical procurement guidance
Digital Tools & Platforms	EU promotes e-procurement and GPP integration tools	Limited use of e-platforms (e.g., only Greece has partial integration in ESIDIS)	GPP digitalization is uneven or absent

GPP2ADRION

Training & Capacity-Building	EU recommends regular training for procurement staff and suppliers	Some donor-led initiatives exist; national-level training frameworks are missing	High demand for systematic, role-specific training programs
Pilot Projects / Innovation	EU supports Living Labs, innovation partnerships, and pre-commercial procurement	Pilots mostly donor-driven (e.g., EU4Green, UNDP in BiH; Interreg in Greece)	Lack of scaling mechanisms and national funding for innovation-oriented procurement

Table 7 Comparative Table – Project Countries vs. EU Baseline

Key Takeaways:

- The ADRION region is broadly aligned with EU frameworks at the legal level but lags significantly in implementation and enforcement.
- Italy is the only country close to the EU baseline, while non-EU countries face systemic obstacles ranging from legislative ambiguity to institutional fragmentation.
- There is an urgent need to invest in cross-border capacity-building, harmonized toolkits, and regional peer learning to elevate the entire macro-region to EU GPP standards.

6. Current State of the Art - Data Collected from Broader Stakeholder Participation

To gain a clearer understanding of the current state of Green Public Procurement (GPP) implementation across the ADRION region, the GPP2ADRION project conducted an online survey targeting key stakeholders in each participating country. The responses provide valuable insights into levels of awareness, regulatory frameworks, institutional practices, and organizational priorities concerning GPP. A total of 133 fully completed questionnaires were analyzed, ensuring broad territorial and institutional representation.

It is important to note that the percentage values presented for each country reflect the share of responses within that specific national sample, not the total number of respondents across the entire survey. This approach allows for a more accurate comparison of trends and perceptions within individual national contexts.

The following section summarizes the key findings, organized around several core questions.

● **Awareness of EU Guidelines on GPP**

When asked about their familiarity with the European Commission’s guidelines and recommendations on GPP, responses varied significantly across countries. Italy reported the highest level of awareness, with 66.67% of respondents stating they are familiar with the guidelines. Serbia (46.15%) and Slovenia (36%) followed. On the other hand, awareness remains low in countries like Bosnia and Herzegovina (20%), Greece (12.12%), and Montenegro (12.5%). A substantial proportion of respondents in these countries reported only limited awareness or no knowledge at all. Notably, 6.06% of Greek respondents stated they do not know where to find the guidelines, highlighting an information accessibility gap.

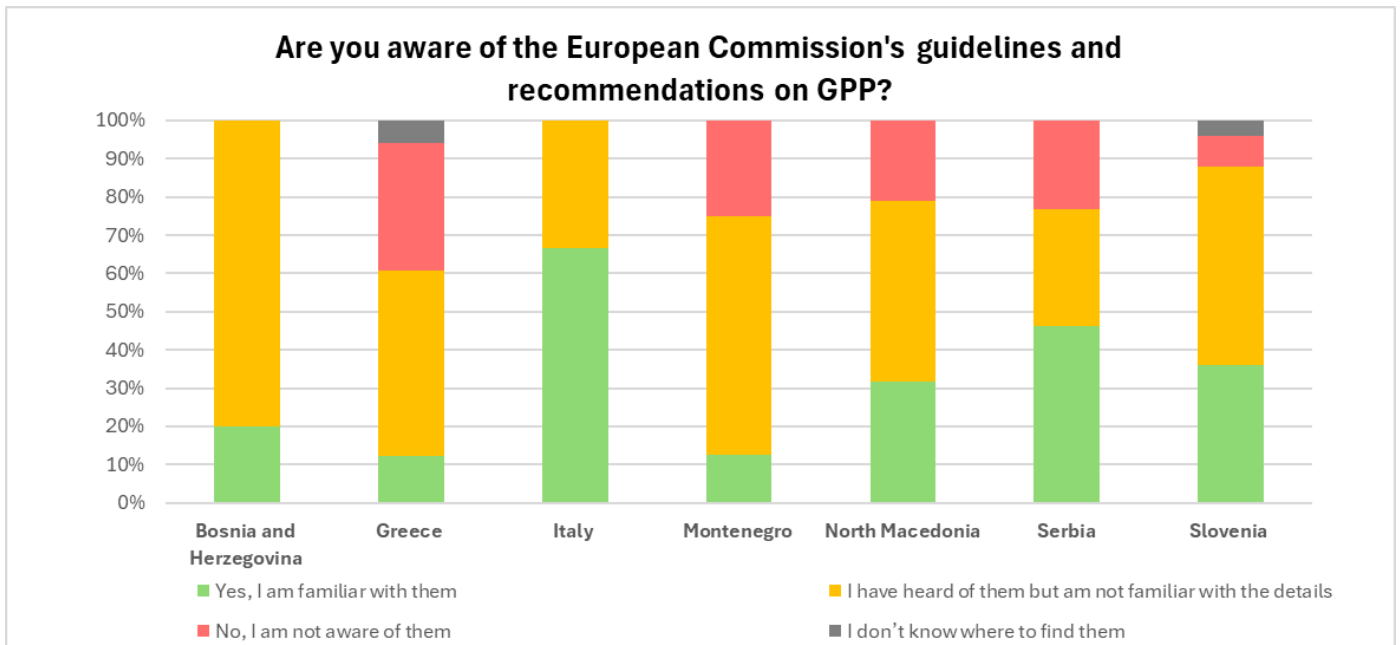


Figure 4 Awareness of EU Guidelines on GPP

● **Awareness of Proposed EU Mandatory GPP Criteria**

Awareness of the European Commission’s proposal for minimum mandatory GPP criteria—intended to influence market behavior—was also uneven. Italy again leads with 83.33% familiarity, followed by Serbia (42.31%) and North Macedonia (36.84%). Most other countries reported much lower levels of awareness, including Slovenia (12%), Greece (12.12%), Montenegro (12.5%), and Bosnia and Herzegovina (10%). A considerable share of respondents in these countries either had only heard of the proposal without detailed understanding or were entirely unaware of it. This suggests a broader need for targeted awareness campaigns and policy dissemination.

● **Existence and Clarity of National GPP Legislation**

Respondents were also asked whether clear laws exist in their countries to support GPP adoption. Italy again ranked highest, with 66.67% affirming the existence of clear legal provisions. In contrast, 70% of respondents in Bosnia and Herzegovina stated that no specific laws are in place, and 75% of those in Montenegro gave the same response. Serbia (80.77%) and Slovenia (64%) reported having GPP-related laws, though most respondents considered them unclear or difficult to interpret. These findings point to the fragmented and often ambiguous legal frameworks in several partner countries, which may hinder consistent implementation.

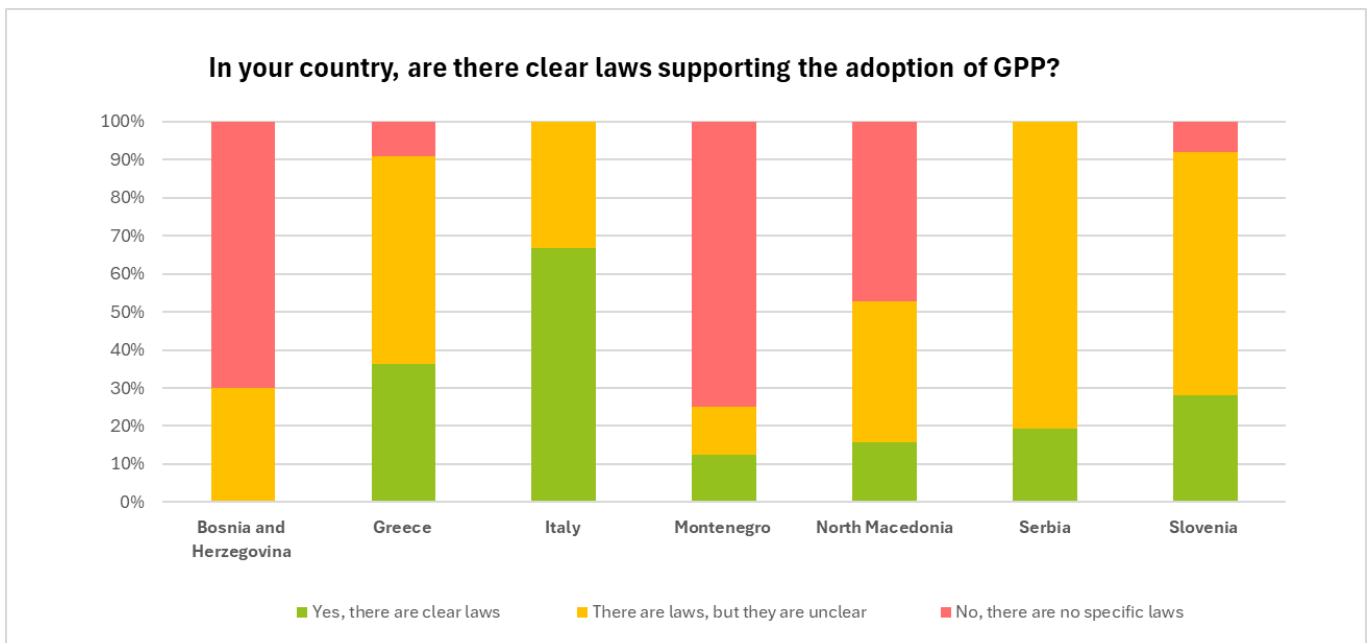


Figure 5 Existence and Clarity of National GPP Legislation

- **Perception of GPP as an Organizational Priority but not strong enough**

Participants were asked to assess whether GPP is prioritized within their organizations. Responses here reflect a general lack of institutional focus on GPP. Italy again showed a relatively strong position, with 50% of respondents stating that GPP is a clear priority. However, in all other countries, the majority of respondents either considered GPP a non-priority or a weak one. In Greece and Montenegro, 57.58% and 62.5% respectively said that GPP is not a priority. Even in Slovenia, which has a relatively advanced legal framework, 52% of respondents said GPP is a “priority but not enough,” suggesting limited operationalization.

- **Presence of Monitoring Systems for GPP Implementation**

Finally, the survey explored whether organizations have formal monitoring systems in place to track GPP implementation. The results show significant gaps in institutional capacity. Only 33.33% of respondents in Italy and 30.77% in Serbia reported having such systems. In contrast, 100% of respondents in Bosnia and Herzegovina and 87.5% in Montenegro stated that no monitoring system exists. Similarly, Greece (0%) and Slovenia

GPP2ADRION

(12%) showed minimal uptake. A notable portion of respondents also indicated uncertainty, especially in Greece, where 27.27% selected “I don’t know,” indicating a possible lack of internal communication or awareness even within institutions.

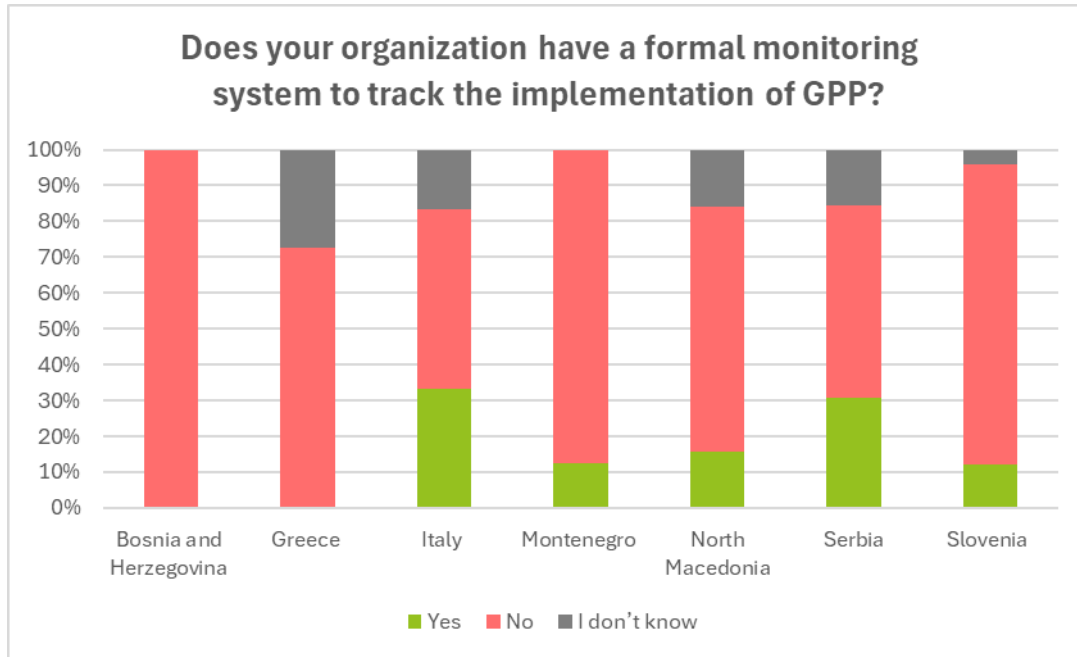


Figure 6 Results on a formal monitoring system

Overall, the data confirms the fragmented nature of GPP knowledge and implementation across the ADRION region. Countries like Italy and, to a lesser extent, Serbia appears to have more advanced frameworks and organizational practices in place. However, many other countries still face significant barriers—ranging from lack of legal clarity and limited awareness to weak institutional prioritization and absence of monitoring tools. These findings underline the importance of capacity-building, policy alignment, and stakeholder training to advance the GPP agenda as a pillar of circular economy development in the region

7. Implementation & practices

The differences regarding GPP practices are not limited to the regulatory framework or the level of awareness; they also manifest in the practical implementation, where actual disparities emerge.

This section presents the analysis conducted through interviews and the online survey on the implementation and practices related to GPP2ADRION in the project area.

In the following chapter key findings are presented by countries.

7.1 Bosnia and Herzegovina

In Bosnia & Herzegovina, stakeholder interviews highlighted a fragmented approach to GPP implementation. While there is some awareness of environmental procurement, the lack of a unified national strategy and clear legal mandates limits progress. Public procurement remains focused on price competitiveness, with limited integration of environmental or circular economy criteria.

Implementation challenges include insufficient training for procurement officers, lack of technical expertise, and limited availability of green products in the market. Stakeholders also pointed to the absence of monitoring mechanisms and performance indicators to evaluate GPP outcomes.

Despite these barriers, a few municipalities and public institutions have initiated green procurement practices, particularly in waste management and energy efficiency. These cases demonstrate the potential for broader adoption if supported by national policies and capacity-building programs.

Recommendations include developing a national GPP framework, enhancing inter-institutional coordination, and investing in training and awareness-raising initiatives. Promoting collaboration between public authorities and suppliers could also help stimulate the market for circular products and services.

7.2 Greece

Greece faces a few challenges in implementing GPP from a contracting authority's perspective. At lower levels of public authority, such as regional and local self-governments, sustainability goals are often not high on the political agenda. Mayors and regional governors often focus on short-term gains while external long-term savings are less important. The outcome is that public procurement officers receive little incentive from their superiors to go "green".

Besides weak incentives to adopt „green“ practices, public procurement officers lack technical knowledge and expertise. At regional and local levels, they have insufficient understanding of how to incorporate ecological criteria into tender documentation, as well as applying eco-labels, energy efficiency measures, and lifecycle costing in practice. Moreover, although standardized GPP criteria exist at the national level, procurement officers from local and regional governments find it challenging to adapt them to their

GPP2ADRION

specific needs. Local authorities need user-friendly templates and tools tailored to local needs, such as LCA and LCC tools.

Next obstacle to the wider implementation of GPP is the perception of higher costs since green products and services are usually more expensive than traditional ones. The purchasing authority pays for products and services upfront. At the same time, the external costs of their impact on the environment stay hidden and are not calculated and compared with the purchasing price. In such a scenario, traditional procurement subjects with lower price and higher external (and total) costs looks like more favorable purchasing option.

Using non-price criteria requires sound justification to control and oversight bodies for paying a higher price than the lowest offered. Thus, GPP is more complex and demanding, requiring additional efforts and skills of public procurement officers to apply ecological criteria. At the same time, GPP is more likely to be challenged as discriminatory by a cheaper bidder in the process of protecting bidders' rights, and the tender to be annulled.

From the bidder's perspective, several constraining factors affect the application of GPP. There is a widespread lack of awareness and understanding of GPP among bidders, especially small companies. Many SMEs are unaware of GPP or that tenders include environmental criteria. They often don't know which green standards, certifications, or labels are recognized and expected in public tenders.

GPP tender requirements are often complicated and unclear for SMEs. Additionally, larger companies have more advanced capabilities to compete for GPP than SMEs because they usually have environmental management systems (like ISO 14001) in place. Furthermore, SMEs frequently face capacity constraints when competing for GPP due to a lack of technical staff or administrative capacity to prepare bids that meet green requirements.

There is a widespread perception among SMEs that “green tenders are not for us” since they believe that larger companies can meet ecological requirements more efficiently and offer lower prices due to diversification and higher potential for economies of scale. To upgrade their capacities to meet environmental criteria and compete for GPP more successfully, SMEs must invest in technology and change their organization and processes, which may generate a too-high cost burden.

7.3 Italy

From the implementation perspective, there are discrepancies compared to what is defined in the theoretical framework. Even if GPP is very strong in Italy and even though it is widely applied overall, some difficulties in implementation persist and are described here. The regulatory and legislative framework for green public procurement (GPP) in Italy is robust and well-structured, as confirmed during interviews. However, all stakeholders highlighted a gap between theory and practice, with implementation not yet reaching its full potential, facing various challenges and barriers. This leads to a partial

GPP2ADRION

application of the tool, not fully exploiting its capabilities. One of the main issues is the difficulty in translating the complex regulatory framework into concrete actions and the lack of practical expertise among the involved parties. Additionally, the market's low maturity in this regard further complicates the process.

On the contracting authority side, both nationally and locally, resistance to change and a tendency to stick with established routines in public administration are the main challenges in implementing GPP. Another key obstacle is the lack of knowledge and technical expertise in GPP among public procurement officers. Compared to traditional procurement, GPP is more complex and demanding, with environmental criteria not influencing contracting authorities' decisions when choosing between "green" procurement options or traditional ones. The availability of adequate tools, such as tender documentation models, would help overcome this challenge. Additionally, employing more technical staff in contracting authorities who are familiar with "green" products and services would promote greater adoption of GPP.

Another difficulty is the low awareness of the benefits of GPP and the circular economy, as well as the strong resistance to using recycled materials. Moreover, the current regulatory framework does not fully support GPP adoption; for instance, there are regulatory conflicts between safety requirements and the purchase of reused furniture.

On the suppliers' side, challenges in GPP implementation relate to the limited capacity of SMEs to compete for contracts with environmental neutrality. Meanwhile, large companies face fragmented supply chains for "green" products and underdeveloped markets. Insufficient demand for "green" products and services weakens the potential for economies of scale, reinforcing the perception that ecological procurement is more expensive than traditional procurement. Existing demand often does not justify significant investments in new technologies needed to produce environmentally neutral products and services, as well as the organizational changes associated with ecological production processes.

Overall, despite the mandatory nature of the tool and the strong methodological framework, there is a lack of support for translating these formal guidelines into practical actions, resulting in an implementation that is not fully realized.

7.4 Montenegro

Montenegro's stakeholder interviews revealed that GPP is still in its early stages, with limited institutional capacity and low awareness among public officials. There is no mandatory GPP policy, and CE principles are not systematically integrated into procurement processes. Procurement officers often lack the training and tools needed to apply environmental criteria effectively.

Challenges include the absence of clear guidelines, limited supplier readiness, and a lack of political commitment to green procurement. Stakeholders also noted that public

GPP2ADRION

tenders rarely include sustainability requirements, and there is minimal engagement with the private sector on CE topics.

However, some promising practices were identified, such as pilot projects in energy-efficient public buildings and interest from local governments in sustainable procurement. These examples suggest that with the right support, GPP could gain traction in Montenegro.

To advance GPP, stakeholders recommend developing a national strategy, providing targeted training, and fostering partnerships between public institutions and green suppliers. Raising awareness and showcasing successful case studies could also help build institutional support and market readiness for circular procurement.

7.5 North Macedonia

At the municipality level, GPP is not fully integrated into procurement processes, and there is no consistent application of circular criteria in tenders. Additionally, there are no tools or platforms to assess suppliers based on green criteria.

Poor communication between public institutions and private suppliers hampers the implementation of GPP/CE. There are no standardized criteria or platforms to guide green procurement, and many businesses lack the capacity to meet green standards due to financial and infrastructural constraints. Additionally, the procedures for participating in GPP tenders are often unclear. The oversight function suffers from poor coordination among different authorities, such as the Ministry of Economy, the Ministry of Environment, and others.

Stakeholder interviews in North Macedonia revealed a low level of awareness and implementation of Green Public Procurement (GPP) and Circular Economy (CE) principles. Public officials and procurement officers often lack training and technical knowledge, which hinders the integration of environmental criteria into procurement processes. There is no national GPP strategy or legal framework mandating green procurement, and CE principles are rarely incorporated into public tenders.

Implementation challenges include limited political will, insufficient institutional support, and a lack of market readiness for circular products. Procurement procedures are still largely based on traditional cost-based criteria, with minimal consideration for environmental impacts. Stakeholders also noted the absence of standardized tools and guidelines to support GPP implementation.

Despite these challenges, there is growing interest among some public institutions and NGOs to promote sustainable procurement. Opportunities lie in developing national policies, launching awareness campaigns, and providing targeted training for procurement officers. Establishing pilot projects and showcasing successful examples from other countries could help build momentum for GPP adoption in North Macedonia.

7.6 Serbia

Resistance to change is a common barrier to GPP implementation. Additionally, contracting authorities often lack awareness of GPP, and there is very limited publicly available information about it. Practical examples of GPP are not actively promoted among contracting authorities.

At lower levels of public administration, contracting authorities have very limited capacity to implement GPP as a new concept. Weak contract enforcement often results in situations where the contracted items, such as “green” products, differ from what is delivered and used—usually cheaper, non-ecological products—due to corruption. Without effective oversight of contract execution, there is no guarantee that ecological goods and services will be used by public authorities.

On the bidders’ side, meeting environmental standards requires changes in the production process and organization, which lead to extra costs for potential bidders. Therefore, there is a need for enough demand for ecological goods and services in the public procurement market that justifies the additional efforts for reorganization and the new, higher costs.

The next significant factor identified by suppliers for higher GPP uptake is the credibility of the public procurement system, which reassures suppliers that they will win contracts if they meet all requirements efficiently. If the public procurement system lacks credibility, bidders will turn to commercial buyers, avoiding the public procurement market. Factors such as high costs and limited supplier options are seen as especially significant by SMEs.

7.7 Slovenia

At the national level, a significant obstacle to broader GPP adoption is resistance to change and preference for traditional procurement methods. The public sector is characterized by inertia and preferences for maintaining existing procedures and routines. This attitude comes from the fact that each new practice requires extra effort and involves risks during implementation. Since the system of public officers’ rewards and pay is weakly linked to their performance and results, they have little motivation to take risks or put in extra effort.

Excessive bureaucracy and unnecessary administration in public procurement hinder wider adoption of GPP. Existing digital tools and the lack of collaborative platforms limit GPP implementation. Public procurement officers do not have the needed level of knowledge in GPP.

At the regional and local levels, there is a lack of awareness and understanding of the circular economy and GPP. Oversight bodies and internal controls often review procurement processes that include environmental criteria. Additionally, bidders frequently challenge them before the review body. All of this, combined with demanding procedures, prolongs the procurement process, increases workload, and raises risks.

Limitations in skills and knowledge are identified in: Life Cycle Cost Analysis (LCA), Financial Analysis of Circular Investments, Risk Management related to Circular

GPP2ADRION

Procurement, Understanding the circular economy, Applying circular criteria in tenders, Supplier evaluation and engagement, and Monitoring and reporting mechanisms.

Higher costs for purchasing “green” products and services reduce potential demand from the public sector and the market for such procurement. The market size is further diminished by the limited availability of suppliers capable of offering “green” products. Both factors (high prices and a low number of suppliers able to meet “green” requirements) negatively impact demand for these products from the public sector.

On the other hand, a factor that positively impacts demand for “green” products and services is that environmental criteria are mandatory. However, circular public procurement (CPP), including reuse and regeneration of materials, remains limited. Many procurement professionals lack a solid understanding of circular economy concepts. Implementing circular principles across all procurement activities has not yet been fully achieved.

Public procurement officers’ skills in effectively incorporating circular economy requirements into procurement documents are underdeveloped. There is limited capacity among procurement officers to evaluate the total cost of ownership, including environmental impacts. Skills to identify and mitigate risks related to sustainable procurement are also underdeveloped.

Public procurement officers’ capacity to monitor and report on the outcomes of green and circular procurement initiatives is limited. Awareness and use of digital solutions that support sustainable procurement are lacking at both the national and local levels.

Circularity regulations are incomplete and differ by sector, covering areas like IT equipment, certain construction materials, and others. The adoption of circular procurement is uneven and remains inconsistent across various sectors.

7.8 Thematic Analysis across GPP2ADRION Region

This thematic analysis synthesizes insights from stakeholder interviews and summary reports across the GPP2ADRION regions. It identifies common patterns, challenges, and best practices in the implementation of Green Public Procurement (GPP) and its integration with Circular Economy (CE) principles. The analysis provides a general overview without focusing on individual countries, aiming to highlight shared experiences and promising approaches.

Across the GPP2ADRION regions, several recurring challenges hinder the effective implementation of GPP and its alignment with CE principles. A major barrier is the lack of a coherent regulatory framework and inconsistent enforcement mechanisms. Many public authorities operate without clear national guidelines or mandates, resulting in fragmented practices and limited accountability. Additionally, procurement officers often lack the technical expertise and training necessary to apply environmental criteria

GPP2ADRION

effectively. This skills gap is compounded by limited awareness of GPP benefits among both public officials and private sector actors.

Another significant challenge is the underdevelopment of markets for green and circular products. Suppliers frequently struggle to meet GPP criteria due to high costs, technological limitations, and insufficient demand signals. The absence of standardized metrics for evaluating circularity and environmental performance further complicates procurement decisions. Moreover, bureaucratic complexity and a preference for traditional procurement methods discourage innovation and experimentation with circular models.

Despite these challenges, several best practices have emerged that demonstrate the potential of GPP to drive sustainability and circularity. One effective strategy is the integration of GPP into broader sustainability and climate action plans, ensuring alignment with national and regional priorities. Some regions have established dedicated GPP units or interdepartmental working groups to coordinate efforts and share expertise. Capacity-building initiatives, such as training programs and knowledge-sharing platforms, have proven valuable in enhancing the skills of procurement officers. Public awareness campaigns and stakeholder engagement activities also help build support for GPP and CE objectives. In some cases, public authorities have adopted flexible procurement models, such as leasing and product-as-a-service, to reduce environmental impact and promote resource efficiency.

A notable example of successful GPP implementation involves the use of mandatory green criteria in public tenders for construction and ICT sectors. This approach has led to measurable reductions in energy consumption and waste generation, while also stimulating innovation among suppliers. The case illustrates the importance of clear policy mandates, robust monitoring mechanisms, and active collaboration between public and private stakeholders.

Key Takeaway

The thematic analysis reveals that while GPP implementation varies across regions, there is a shared recognition of its potential to support circular economy goals. Addressing regulatory gaps, enhancing institutional capacity, and fostering market readiness are critical steps toward more effective and harmonized GPP practices. By learning from successful cases and scaling best practices, regions can leverage GPP as a strategic tool for sustainable development and environmental stewardship.

7.9 Highlights and Comparative Insights

The comparative analysis across participating countries reveals a set of **shared challenges** as well as **country-specific dynamics** shaping the implementation of Green Public Procurement (GPP).

GPP2ADRION

Across all countries, resistance to change emerges as one of the most significant barriers. Public administration tends to favor existing procedures, while the introduction of new practices often implies additional effort and potential risks. Because reward and promotion systems for public officers are only weakly linked to performance, there is little motivation to experiment or go beyond established routines. At the same time, a lack of technical knowledge and practical expertise hampers GPP uptake. Procurement officers frequently struggle with applying life cycle costing (LCC) and life cycle analysis (LCA), integrating environmental or circular criteria into tender documents, evaluating suppliers based on sustainability standards, and setting up effective monitoring and reporting mechanisms.

The perception of higher costs further complicates the picture. Green products and services are generally considered more expensive than conventional ones, discouraging procurement officers from incorporating them into tenders. Where paying above the lowest bid requires additional justification to oversight bodies, GPP processes are perceived as complex, risky, and resource-intensive. Limited supplier availability compounds the challenge: underdeveloped markets for environmentally friendly products and services restrict competition, keep prices high, and reduce incentives for public authorities to engage in GPP.

Small and medium enterprises (SMEs) face their own set of obstacles. In many cases, they lack awareness of recognized green standards, labels, and certifications, and often lack the technical or administrative capacity to meet green tender requirements. For many SMEs, especially in Greece, “green tenders” are seen as inaccessible — they assume larger companies have an advantage thanks to diversified portfolios, better pricing strategies, and economies of scale. For SMEs to compete effectively, investments in new technologies, improved processes, and organizational restructuring are needed, yet such investments are perceived as costly and risky in the absence of predictable demand.

While these systemic barriers are common, **country-specific insights** highlight important nuances. In Slovenia, knowledge gaps persist particularly in LCC, LCA, and integrating circular economy principles into procurement documents. Monitoring and reporting capacities remain limited, especially at the local level, and digital tools that could support sustainable procurement are not widely used. In Greece, environmental objectives are often lower on the political agenda, with mayors and regional governors prioritizing short-term gains. Procurement officers lack practical guidance on using eco-labels, energy efficiency criteria, and lifecycle costing, while local authorities call for user-friendly templates and tailored tools to simplify implementation. In Italy, shortages of technical staff in contracting authorities slow down progress, while fragmented supply chains for green products prevent economies of scale and reduce the incentive for companies — even larger ones — to invest in new technologies or processes.

These insights lead to several **overarching conclusions**. All countries face **similar systemic obstacles**, yet their political priorities, administrative capacities, and market conditions differ significantly. Addressing these challenges requires more than mandating the use of green products and services. Procurement officers need targeted capacity building in areas such as LCC, LCA, and supplier evaluation, as well as access to simplified tools and templates that make green procurement less complex. SMEs must

be supported to engage more confidently in GPP, through awareness-raising, clearer tender criteria, and incentives for technological innovation. At the same time, strengthening demand through political commitments and mandatory green procurement must go hand in hand with developing supplier markets; otherwise, high costs and limited availability will continue to constrain progress.

8. Benchmarking and Comparative Assessment (Interview Results)

8.1 Benchmarking Approach

The benchmarking approach adopted in the GPP2ADRION project was designed to provide a comprehensive, comparative understanding of the current state of Green Public Procurement (GPP) implementation across the. Recognizing the diversity of institutional, legal, and economic contexts among the participating countries, the methodology emphasized both qualitative and quantitative dimensions, aiming to identify shared challenges, emerging strengths, and opportunities for harmonization.

The foundation of the benchmarking process was a structured interview framework, conducted with key stakeholders in each partner country. These stakeholders included representatives from public authorities, procurement offices, SMEs, and policy-making bodies. The interviews were designed to elicit insights into the practical realities of GPP implementation, including awareness levels, institutional capacity, regulatory frameworks, and market readiness for circular economy (CE) products and services.

To ensure consistency and comparability, the interviews were guided by a common set of thematic areas. These included: the existence and enforcement of national or regional GPP policies, the integration of environmental criteria in procurement procedures, the availability of training and capacity-building initiatives, the role of SMEs in the GPP ecosystem, and the presence of monitoring and evaluation mechanisms.

The data collected through these interviews was then synthesized into a cross-country analysis, rather than a country-by-country breakdown. This approach allowed the project team to identify macro-regional trends and systemic barriers that transcend national borders. It also enabled the identification of leading practices that could serve as models for replication across the region.

The benchmarking methodology also sought to highlight innovation. Particular attention was given to cases where public procurement had been successfully leveraged to stimulate demand for circular products and services, or where institutional arrangements had facilitated the mainstreaming of GPP practices. Ultimately, the benchmarking approach served a dual purpose: first, to establish a shared understanding of the current state of GPP implementation across the EUSAIR region; and second, to lay the groundwork for targeted capacity-building and policy harmonization efforts. By focusing on both the structural and operational dimensions of GPP, the analysis provides a robust

GPP2ADRION

foundation for the subsequent development of regional contact points, GPP Ambassadors, and a transnational support network.

In addition to it, an online survey was conducted with a wider stakeholders in each of the partner countries.

8.2 Synthesis of Best Practices and Innovations

This section synthesizes best practices and innovations in Green Public Procurement (GPP) across the seven partner countries involved in the GPP2ADRION project: Italy, Greece, Bosnia and Herzegovina, Serbia, Montenegro, North Macedonia, and Slovenia. The insights are derived from stakeholder interviews and reflect successful initiatives, pilot projects, innovative procurement models, and lessons learned.

Bosnia and Herzegovina:

Although GPP is emerging, Bosnia and Herzegovina has launched promising initiatives like EU4Green and GED. The BEEP project focuses on energy efficiency in public buildings. These pilots highlight the potential for scaling GPP in a context with limited legal mandates.

Greece:

Greece has implemented digital procurement systems and participated in EU-funded projects such as GRASPINNO and GPP4Growth. The Municipality of Kavala's GPP tender showcases local-level innovation. Despite the lack of formal KPIs, Greece has made strides in categorizing GPP sectors and piloting lifecycle costing approaches.

Italy:

Italy demonstrates a mature GPP landscape with several institutionalized practices. The use of CAMs (Minimum Environmental Criteria) is mandatory and supported by training programs such as CReIAMO PA. The Forum Compraverde and Osservatorio Appalti Verdi serve as platforms for knowledge exchange and monitoring. The University of Padova's reuse portal exemplifies circular procurement in academia.

Montenegro:

Montenegro has initiated training programs and stakeholder consultations to promote GPP. The country is leveraging EU alignment processes to introduce environmental criteria in procurement. Pilot projects in waste management and energy efficiency are notable.

North Macedonia:

North Macedonia has focused on stakeholder clustering and cross-sectoral dialogue. Pilot tenders and academic involvement are helping to build a foundation for GPP. The country is exploring the use of simplified templates and evaluation tools.

Serbia:

Serbia has engaged in awareness campaigns and pilot tenders that incorporate environmental criteria. The country is exploring the integration of GPP into broader

GPP2ADRION

sustainability strategies. Stakeholders emphasize the importance of capacity building and supplier engagement.

Slovenia:

Slovenia stands out for its structured stakeholder engagement and integration of GPP into national strategies. The country has implemented pilot projects in construction and IT procurement. Research institutions play a key role in developing evaluation methodologies.

Across the region, several innovative practices have emerged:

- Use of digital platforms for procurement and monitoring
- Integration of lifecycle costing and environmental impact assessments
- Collaboration between public authorities, academia, and SMEs
- Development of reusable and circular product criteria

In conclusion, the synthesis of experiences across the seven GPP2ADRION partner countries highlights both the diversity of contexts and the shared drivers for advancing Green Public Procurement (GPP). Several important lessons emerge clearly. First, institutional support and legal mandates – such as Italy's CAMs or Slovenia's national strategies – provide the foundation for embedding GPP into long-term policy frameworks. Equally crucial are capacity-building initiatives and awareness campaigns, which empower both procurers and suppliers to engage with new criteria and foster cultural change, as seen in Serbia, Montenegro, and North Macedonia.

Pilot projects have proven to be highly effective instruments across the region. Whether in construction, energy efficiency, IT procurement, or waste management, they demonstrate feasibility, build confidence, and create replicable models. Moreover, the adoption of digital procurement systems and monitoring platforms, particularly in Greece, shows the potential for technology to streamline procedures, ensure transparency, and collect performance data.

Another consistent finding is the importance of collaboration among public authorities, academia, SMEs, and civil society. Multi-stakeholder engagement generates innovation, strengthens knowledge transfer, and ensures that solutions are practical and context-specific. This collaboration also fosters the creation of circular and reusable product criteria, moving procurement beyond compliance toward genuine sustainability transitions.

Finally, the need for harmonization and consistency is evident. Establishing comparable approaches – for example, standardizing the order of reporting countries or unifying evaluation methodologies – helps ensure cross-country learning and facilitates the scaling of GPP practices across the Adriatic-Ionian region.

8.3 Identification of Leading Areas

The benchmarking process revealed several areas where progress in Green Public Procurement (GPP) is most evident across the region. While the overall level of GPP implementation varies, certain thematic and operational domains emerged as leading examples of advancement, innovation, and institutional maturity. These areas not only

GPP2ADRION

reflect successful national or regional efforts but also offer valuable insights for replication and scaling across the macro-region.

One of the most prominent leading areas is the integration of GPP into national policy frameworks. In several countries, GPP is no longer treated as a peripheral or optional practice but is embedded within broader environmental and procurement strategies. This institutionalization has provided a stable foundation for implementation, ensuring that GPP is not dependent on isolated projects or individual champions but is supported by legal mandates and strategic planning. In some cases, national action plans explicitly reference circular economy goals, aligning procurement practices with long-term sustainability objectives.

Another area of leadership is the development of technical tools and guidelines to support contracting authorities. Countries that have made significant strides in GPP often provide centralized resources such as standard tender templates, environmental criteria databases, and sector-specific guidance documents. These tools reduce the complexity of applying GPP in practice and help ensure consistency and legal compliance. Their availability also signals a shift from policy ambition to operational readiness.

Capacity building and training emerged as a third leading area. In several contexts, structured training programs have been developed for procurement officers, environmental managers, and SMEs. These programs often go beyond awareness-raising to include practical exercises, case studies, and peer learning opportunities. Where such initiatives are sustained and institutionalized—often through partnerships with universities or training institutes—they contribute to a growing community of practice around GPP.

The engagement of SMEs in the GPP ecosystem is another noteworthy area of progress. In some countries, targeted efforts have been made to help SMEs understand and respond to green procurement criteria. This includes outreach campaigns, simplified documentation requirements, and support for eco-certification. By addressing the supply side of the market, these initiatives help ensure that GPP does not become a barrier to participation but rather a driver of innovation and competitiveness.

Finally, monitoring and evaluation mechanisms are beginning to take root in a few leading contexts. While still limited in scope, these systems provide valuable data on the uptake and impact of GPP. They also create feedback loops that can inform policy adjustments and capacity-building efforts. The presence of such mechanisms reflects a maturing approach to GPP—one that values not only implementation but also learning and accountability.

These leading areas demonstrate that meaningful progress is possible even in complex and resource-constrained environments. They also highlight the importance of a systemic approach—one that combines policy, tools, capacity, market engagement, and monitoring. As the GPP2ADRION project moves forward, these areas of leadership can serve as anchors for regional harmonization and inspiration for countries at earlier stages of implementation.

9. Conclusions

9.1 Key Takeaways

The **Benchmark Analysis Report** set out to establish a comprehensive baseline on the state of Green Public Procurement (GPP) implementation across the ADRION partner countries — **Italy, Slovenia, Greece, North Macedonia, Serbia, Montenegro, and Bosnia & Herzegovina** — with the aim of informing capacity-building actions and the transnational cooperation framework of GPP2ADRION. Drawing on documentary review, policy benchmarking, stakeholder interviews, and survey data, the report has identified both systemic and context-specific factors that shape the uptake of GPP in the macro-region.

The evidence presented confirms that, while GPP is recognized in principle as a tool to support the circular economy transition, its operationalization remains fragmented and uneven. The assessment shows that more advanced partner countries, such as Italy and Slovenia, have established legal frameworks, dedicated guidance, and at least partial monitoring systems. In contrast, most of the Western Balkan countries are at an early stage of adoption, with weak or absent regulatory provisions, limited institutional mandates, and minimal market preparedness. Across the region, there is a consistent lack of integration of circular economy (CE) principles into procurement practice, even where basic environmental criteria are applied.

Importantly, the benchmarking exercise has revealed that these challenges are not isolated but interconnected — regulatory gaps affect institutional clarity, institutional fragmentation limits training and guidance, and the absence of monitoring prevents evidence-based policy adjustment. This reinforces the need for a coordinated, transnational approach that addresses the full policy–institution–market chain rather than isolated components.

9.2 Overview from Interview Reports

The interviews with key stakeholders across all partner countries provided valuable qualitative insights into the lived realities of GPP implementation. They reveal that awareness and technical understanding of GPP vary greatly between central administrations, local governments, and market actors. Central-level institutions in Italy and Slovenia exhibit higher familiarity with environmental criteria and minimum standards (CAMs), while in countries like Montenegro or Bosnia & Herzegovina, GPP remains largely a conceptual aspiration.

Stakeholders consistently highlighted **institutional fragmentation**, noting weak communication between procurement authorities and environmental bodies. Even where action plans or legal references exist (e.g., Greece), these are often inactive due to insufficient resources, lack of dedicated staff, or low political prioritization. Capacity constraints are significant: public buyers frequently lack the skills to draft tenders with robust environmental criteria, and suppliers — especially SMEs — are often unaware of certification requirements or lack the capacity to comply.

GPP2ADRION

A striking finding from interviews is the **absence of functional monitoring systems**, which not only hinders transparency but also means that governments lack the data needed to evaluate environmental and economic impacts. Overall, interview feedback points to GPP as a policy goal in transition, with Italy and Slovenia showing partial maturity, and other countries still dependent on project-based or donor-driven initiatives.

9.3 Overview from Survey Results

The survey results complement these qualitative insights with quantitative evidence. Data shows that the overall penetration of GPP criteria into procurement processes is still low across the ADRION region. Even in relatively advanced systems, the percentage of tenders incorporating environmental requirements is below optimal, and in the Western Balkans, it is negligible.

Survey findings confirm that **circular economy integration is minimal**. Environmental elements such as energy efficiency or waste management are occasionally included, but lifecycle costing, design for reuse, and other CE features are rarely applied. Institutional readiness varies significantly: Italy and Slovenia score highest, supported by legal mandates and trained personnel; Montenegro, Bosnia & Herzegovina, and North Macedonia score lowest due to the absence of frameworks and institutional support.

Supplier readiness is a recurring weakness. Across all partner countries except Italy, suppliers lack access to information, affordable certification schemes, and technical support to participate in green tenders. Monitoring and reporting systems are absent in most countries, with only Italy and Slovenia having partial structures in place.

9.4 Main Takeaways – Comparative Reflections

When considered together, the interviews and survey findings reveal strong **alignment in identifying the key barriers**:

- Institutional fragmentation
- Weak regulatory integration of CE principles
- Lack of technical skills among buyers and suppliers
- Absence of monitoring and performance data

Interviews bring forward the **contextual “why”** — including political will, cultural attitudes, and practical obstacles. Surveys quantify the **extent** of the gaps, providing comparative baselines for readiness, market engagement, and monitoring.

Both data sources underscore that the ADRION region faces a **dual challenge**:

1. **Structural** – Insufficient legal and institutional foundations for GPP linked to CE goals.
2. **Operational** – Low capacity, market readiness, and data systems to support implementation.

Italy and Slovenia demonstrate that progress is achievable through strong mandates, institutional coordination, and consistent capacity-building. However, even these

GPP2ADRION

systems show uneven regional uptake, highlighting the importance of sustained investment in skills, tools, and monitoring frameworks.

In conclusion, the findings from this report point to a clear roadmap for GPP2ADRION: address the shared regional gaps through harmonized capacity-building and knowledge exchange, while tailoring interventions to national contexts to ensure both policy alignment and operational readiness. Without bridging both structural and operational divides, the region risks missing the opportunity for GPP to be a driver of the circular economy and sustainable market transformation.

10. Annexes

- Annex A: Analysis of EU GPP criteria
- Annex B: List of Interviewed Stakeholders
- Annex C: WPI_Guidelines- Stakeholders mapping and reporting interviews
- Annex D: Questionnaire 1. – Cabinet Work
- Annex E: Questionnaire 2. – Stakeholders Interview
- Annex F: Questionnaire 3. – Online Survey
- Annex G: Online Survey results