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DELIVERABLE 1. 2.: **Gap Analysis Report**

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ABSTRACT / EXECUTIVE SUMMARY

The Deliverable Gap Analysis Report (D1.2.1) builds on the Benchmark Analysis Report (D1.1.1) and together they form the analytical foundation of WP1. While the D1.1.1 Benchmark Report extensively mapped the state of the art of GPP and CPP procedures across the ADRION region, the Gap Analysis goes a step further by identifying the barriers and needs as well as opportunities for strengthening GPP implementation in support of circular economy objectives. In this sense, the deliverable represents both an upgrade of the Benchmark Analysis, particularly through the additional evidences gathered through stakeholder interviews and online survey, and a complementary document, with both reports to be considered jointly. For this reason, all both Deliverables have the same annexes, already provided at the D1.1.1.

The analysis was based on a unified methodology applied across all partner countries and set up already within the A1.1. and presented in the D1.1.1. Benchmark Analysis Report. It combined stakeholder mapping and classification, semi-structured interviews, and an online survey. The interviews provided in-depth qualitative perspectives grounded in institutional realities and operational knowledge, while the survey reached a larger number of stakeholders and ensured the inclusion of more diverse voices. Although the survey was originally foreseen only under Activity A1.2, it was designed with a comprehensive scope so that it also supported Activity A1.1, thereby maximizing the consistency and usefulness of the data collected. The integration of these tools ensured comparability across countries and a balance between qualitative and quantitative evidence.

The results highlight uneven awareness and fragmented implementation of GPP across the ADRION region. Stakeholders reported challenges such as limited institutional capacity, inconsistent enforcement of regulations, insufficient supplier readiness for circular products and services, lack of monitoring systems and KPIs, and gaps in training and awareness among both procurers and suppliers. At the same time, the analysis also identified opportunities, including promising pilot initiatives, stronger frameworks in frontrunner countries, and growing engagement of SMEs and local authorities. These opportunities represent a valuable starting point for scaling up GPP and embedding circular principles into public procurement.

The findings of the Gap Analysis provide the analytical basis for the next project steps. They will inform the preparation of the Capacity Building Plan (A1.3), guide the definition of Contact Point activities (A1.4), and support the establishment of the transnational GPP network (A2.2). All annexes relevant to stakeholder mapping and data collection were already submitted with the Benchmark Analysis Report, ensuring continuity and coherence between the two deliverables.

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In summary, the Gap Analysis Report provides a comprehensive cross-regional overview of the barriers and needs that hinder wider adoption of GPP, while also pointing to concrete opportunities for progress. Together with the Benchmark Analysis, it ensures that the upcoming activities of the GPP2ADRION project are well targeted, feasible and strategically positioned to accelerate the uptake of GPP and advance the transition toward a circular economy in the ADRION region.

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1. Introduction

1.1 Purpose of the Gap Analysis Report

Overall Purpose of the Gap Analysis Report

The purpose of the Gap Analysis Report (D1.2.1) is to assess the current implementation of Green Public Procurement (GPP) and to analyze the knowledge, capacity, and readiness of key stakeholders to apply GPP procedures aligned with circular economy principles. The report identifies barriers and gaps in implementation, knowledge, institutional resources, and market dynamics that may hinder the effective uptake of circular GPP practices across the ADRION region.

The findings provide the foundation for the next stages of the project, including the development of tailored capacity-building activities, the establishment of GPP contact point services, and the strengthening of transnational cooperation. In this way, the report contributes directly to improving the conditions for a wider adoption of GPP and the integration of circular principles in public procurement.

Scope and Objectives

The scope of the Gap Analysis extends to both EU and IPA partner countries in the ADRION programme area. The analysis considers the diversity of institutional, policy, and market contexts in these countries while also identifying common patterns, gaps, and opportunities.

The specific objectives of the report are to:

- Provide an overview of the state of knowledge and awareness of stakeholders regarding GPP and CPP;
- Recognize the readiness of markets and suppliers, particularly SMEs, to respond to circular procurement requirements;
- Examine the role and engagement of policy makers and public institutions in promoting GPP;
- Identify potential barriers, needs, and opportunities for strengthening GPP implementation and uptake in support of the circular economy.

Structure of the Report

The report is structured into the following main parts in order to present the approach, methodology, and findings in a clear and systematic way:

- Executive Summary
- Introduction
- Gaps in Regulatory and Policy Frameworks
- Gaps in Institutional and Organizational Capacities
- Gaps in Implementation Practices
- Gaps in Stakeholder Engagement and Awareness

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- Gap Patterns Across the ADRION Region
- Opportunities and Potential Leverage Points
- Conclusion – Next Steps

1.2 WP1 and Activity A1.2 in Context – State of the Art Baseline for Gap Identification and Market Needs

Work Package 1 (WP1) provides the analytical basis for setting up and implementing the Green Public Procurement in line with circular economy objectives. Activity A1.2 (Identification of gaps and barriers for GPP for circular economy implementation in the regions) and its corresponding deliverable D1.2.1 (Gap Analysis Report) represent a central component of WP1.

This activity builds directly on the Benchmark Analysis Report (D1.1.1), which mapped the state of the art of GPP and CPP practices, procedures, and regulatory frameworks across the ADRION region. While the Benchmark Analysis described the current landscape and provided examples of good practice, the Gap Analysis focuses on **identifying shortcomings, barriers, and needs at institutional and market levels**. The two deliverables should therefore be read together:

- the Benchmark answering the question “*Where are we now?*”, and
- the Gap Analysis clarifying “*What is missing and what is needed to move forward?*”

1.3 Approach and Methodology

The methodology applied in Activity A1.2 was designed as a comprehensive and integrated approach, building on and complementing the work undertaken in Activity A1.1. The same framework and shared tools were used across both deliverables, ensuring consistency, comparability, and reliability of the results.

The approach combined desk research, a shared questionnaire, and broad partner contributions to ensure consistency and comparability across countries. Desk research established the baseline on EU and national GPP and circular economy policies, guiding the questionnaire design, which served as the foundation for both semi-structured interviews and the online survey. Although originally foreseen only under A1.2, the survey was deliberately expanded to also address A1.1, strengthening coverage and evidence. All partners actively contributed by mapping and engaging stakeholders, conducting interviews, promoting survey participation, and providing contextual insights.

The methodology used is presented in the Figure 1:

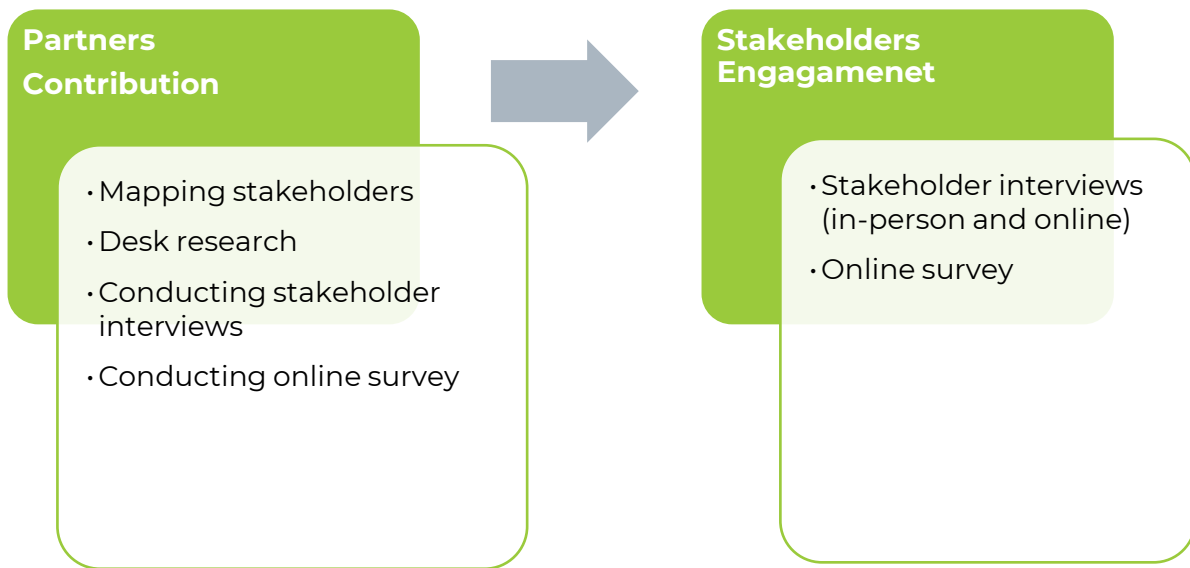


Figure 1 Approach and Methods in A1.1 and A1.2

The methodology and approach are explained in the **D1.1.1 – Chapter 1.2: Approach and Methodology**.

Comparative analysis logic – criteria

The collected data were then analysed comparatively using predefined criteria on stakeholder knowledge, institutional capacity, market readiness, and policy alignment, enabling the identification of both shared challenges and country-specific gaps and forming the basis for recommendations and future project activities.

2. Gaps in Regulatory and Policy Frameworks

2.1 Overview of Existing Legal and Policy Frameworks

The legal and policy environment for Green Public Procurement (GPP) across the ADRION region is varied, reflecting a spectrum of development, from mature systems with mandatory requirements to nascent frameworks still under development. As outlined in the D1.1 Benchmark Analysis Report, while all participating countries have legal provisions allowing environmental criteria in procurement, the depth of circular economy (CE) integration, enforcement, and institutional coordination differs significantly.

<p>Italy</p>	<p>The most advanced legal and policy environment, underpinned by the Legislative Decree 50/2016, which mandates the application of Minimum Environmental Criteria (CAM) in numerous sectors. The National Action Plan on GPP (PAN GPP) define this framework with regular updates and sectoral strategies.</p>
<p>Slovenia</p>	<p>It has a longstanding commitment to GPP, with a Decree on Green Public Procurement (2009) requiring environmental criteria in 11 product categories. However, enforcement and decentralization challenges persist, particularly among smaller municipalities.</p>
<p>Greece</p>	<p>Formalized GPP through the GPP Action Plan 2021–2025 and integrated selected criteria into its procurement law (Law 4412/2016). Yet, implementation is still partial, and CE considerations remain limited to specific sectors.</p>
<p>Bosnia and Herzegovina, Montenegro, North Macedonia, Serbia</p>	<p>GPP is legally permitted but remains largely voluntary. They allow the inclusion of environmental criteria under public procurement laws, often modeled after EU directives. However, these laws are seldom accompanied by actionable policies, national plans, or institutional frameworks that would enable systematic application of GPP. Importantly, none of the Western Balkan countries have adopted a national strategy exclusively focused on GPP, and integration with CE agendas is generally weak or symbolic. The absence of binding targets, structured capacity-building mechanisms, and dedicated institutional mandates undermines the practical use of GPP across the region.</p>

Table 1 General overview and clusters of the existing regulatory frameworks

2.2 Identified Gaps at National and Regional Level

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The gap analysis conducted across the ADRION region reveals several recurring weaknesses that hinder the effective implementation of Green Public Procurement (GPP) and its alignment with circular economy objectives. Despite progress in policy frameworks and the existence of high-level commitments, significant shortcomings remain in translating these into operational procurement practices.

The following sections highlight the most critical gaps identified at both national and regional levels, focusing on the limited integration of circular economy principles, inconsistencies and misalignment between policies, and the predominantly voluntary nature of GPP provisions, which together reduce its enforceability and impact.

- **Absence or Weakness of Circular Economy Integration**

A fundamental gap observed across the ADRION region is the insufficient integration of circular economy principles into legal and policy frameworks governing GPP. While CE is acknowledged in national development strategies or environmental action plans, there is a significant disconnect between high-level CE commitments and operational procurement policies.

For instance, CE is referenced in North Macedonia's Green Agenda commitments and Serbia's environmental strategy, but no procurement-specific provisions ensure its application. In Montenegro and Bosnia and Herzegovina, CE remains a conceptual objective with no tangible legal pathway to implementation within procurement systems. In contrast, Italy and, to a lesser extent, Slovenia, exhibit better alignment between CE and GPP, as their legal criteria explicitly promote lifecycle thinking, waste reduction, and resource efficiency. However, even in these cases, CE is not always systematically applied outside priority sectors like construction or energy.

The failure to operationalize CE within procurement tools—such as tender documents, award criteria, and performance indicators—undermines the potential of GPP to act as a driver of circular market transformation.

- **Inconsistencies Between Policies - the Lack of Interministerial Coordination**

Another regional gap is the lack of coherence between procurement policies and other related legal instruments, such as environmental protection laws, waste management plans, and national sustainable development strategies.

For example, Greece's public procurement law and GPP Action Plan are not always aligned with CE objectives stated in other national environmental strategies. Similarly, in the Western Balkans, procurement laws often make no reference to environmental or circular priorities identified in sectoral legislation, resulting in fragmentation.

Such policy misalignment leads to confusion among contracting authorities, discouraging the inclusion of green criteria due to perceived legal uncertainty or conflicting objectives. This is further exacerbated by the lack of interministerial coordination between procurement authorities and environmental institutions. Additionally, inter-jurisdictional inconsistencies, particularly in federal or semi-federal systems like Bosnia and Herzegovina, amplify the problem. While national-level laws

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permit GPP, local or entity-level authorities interpret and apply these inconsistently, with some cantons or districts having no awareness or structure to support GPP implementation.

- **Limited Enforceability or Mandates - Voluntary Nature of GPP**

The analyses reflect that probably the most critical regulatory gap is the voluntary nature of GPP in most ADRION countries. Except for Italy, none of the countries mandate the use of environmental criteria in public procurement. As a result, even when environmental provisions exist in legal texts, their non-compulsory status renders them largely symbolic.

For instance, Serbia’s 2019 Law on Public Procurement allows environmental criteria but offers no obligation to apply them. In practice, tenders continue to prioritize the lowest price, with environmental considerations treated as optional or secondary. The same is true for Montenegro and North Macedonia, where contracting authorities rarely apply environmental requirements unless prompted by donor projects.

In the absence of mandates or minimum thresholds, public buyers are not incentivized to use GPP tools, and the private sector remains unmotivated to green their offerings. Moreover, there is no legal requirement for monitoring or reporting on GPP performance in most countries, leaving no accountability mechanism in place.

2.3 Comparative Summary

This table below outlines the key legal and policy-related shortcomings affecting GPP implementation in each country, including gaps in CE integration, policy coherence, enforceability, and institutional mandates. It provides a cross-country baseline to inform harmonization efforts and future regulatory alignment.

Country	CE Integration in GPP	Policy Coherence	Legal Enforceability	Overall Framework Maturity
Bosnia & Herzegovina	Very Weak – No CE or GPP linkage	Very Low – Highly fragmented	Very Low – Voluntary and inconsistent	Nascent
Greece	Limited – Sector-specific	Medium – GPP Plan not fully aligned	Low – GPP mostly voluntary	Developing
Italy	Strong – CE embedded in CAMs	High – PAN GPP aligns with CEAP	High – GPP mandatory	Advanced
Montenegro	Weak – No CE legal reference	Low – Environment and procurement unlinked	Low – No enforcement mechanism	Emerging

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North Macedonia	Weak – CE not operationalized	Low – Fragmented sectoral policies	Low – GPP voluntary	Emerging
Serbia	Very Weak – No CE linkage	Low – Isolated CE strategies	Low – Legal provisions, no mandate	Emerging
Slovenia	Moderate – Some CE elements	Moderate – Partial sectoral link	Medium – GPP mandatory for 11 categories	Intermediate

Table 2 Comparative Overview of Regulatory and Policy Gaps in GPP Across Partner Countries

2.4 Stakeholder Insights (Selected Quotes and Summaries)

The interviews conducted as part of the GPP2ADRION baseline provided firsthand insights into how gaps in legal and policy frameworks affect implementation.

“Our procurement officers want to include green criteria, but they’re afraid of being challenged legally since there’s no binding rule.”

– Municipal official, North Macedonia

“We have policies on paper, but they’re not synchronized. One ministry promotes CE, another focuses only on cost savings.”

– Procurement expert, Greece

“Without a mandate, GPP is just a suggestion. It doesn’t change procurement behavior.”

– National environmental agency, Serbia

“The only time we use GPP is when EU-funded projects require it. There’s no internal driver.”

– Procurement manager, Montenegro

“Italy shows that legal mandates matter. Once GPP became compulsory, even local governments had to adapt.”

– Academic researcher, Italy

These statements reflect a regional consensus: the absence of enforceable, coherent legal mandates remains the single most significant barrier to mainstreaming GPP and leveraging it to advance circular economy objectives.

3. Gaps in Institutional and Organizational Capacities

3.1 Weaknesses and Limitations in Institutional Structures and Capacities

While regulatory frameworks are a foundational component of Green Public Procurement (GPP) implementation, the effectiveness of institutional structures and the capacity of responsible actors are just as crucial. In practice, the success of GPP depends on well-defined institutional mandates, trained personnel, effective internal coordination, and the availability of dedicated units or individuals responsible for driving implementation. However, findings from interviews across partner countries reveal critical gaps in these areas, affecting both the pace and quality of GPP adoption.

This chapter examines these institutional limitations provided in detail based both on cabinet work and results of stakeholder interviews. It outlines the unclear or overlapping mandates of responsible authorities, the skill and knowledge deficits among key stakeholder groups, and the absence of dedicated teams or focal points to lead or support the transition. The analysis highlights systemic fragmentation, a lack of ownership, and the resulting inefficiencies that stall progress despite growing political will or regulatory progress. The last section of this chapter presents also the gaps gathered via online survey.

3.2 Institutional Roles and Responsibilities

A fundamental prerequisite for the successful implementation of Green Public Procurement (GPP) is the **clear delineation of institutional roles and responsibilities**. Across the ADRION region, however, the mapping of institutional mandates remains **fragmented, undefined, or inconsistently applied**. The institutional picture is increasingly fragmented in the Western Balkans. The result is an operational landscape in which responsibility for GPP is either shared ambiguously between multiple actors or, in some cases, assigned to no one at all.

Greece

Greece's institutional setup, as outlined in the GPP Action Plan 2021–2025, assigns formal roles to the Single Public Procurement Authority (SPPA) and the Ministry of Environment and Energy, indicating growing central-level coordination. However, these assignments are not fully translated into active institutional cooperation, especially in terms of shared training systems, monitoring structures, or joint support to subnational bodies. In practice, local procurement authorities often operate in isolation, with limited guidance from national agencies.

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Italy

In Italy, the institutional ecosystem supporting GPP is both structured and mature. The Ministry for the Environment and Energy Security (MASE) is tasked with defining Minimum Environmental Criteria (CAM). Additionally, the National Anti-Corruption Authority (ANAC) oversees compliance, and a network of regional and municipal actors supports localized implementation. This vertical and horizontal alignment across administrative levels provides a strong backbone for the enforcement and practical rollout of GPP. However, a problem highlighted in the Italian context is that the highly structured and comprehensive regulatory framework is not adequately supported by practical assistance in the implementation of GPP practices. Many stakeholders, particularly through interviews, pointed out a gap between the regulatory framework and the actual technical and practical capacity available at the local level in Italy.

Montenegro

Institutional roles are especially opaque. The procurement function is primarily managed by the Directorate for Public Procurement Policy, but no reference is made to GPP in its strategic or operational framework. The Ministry of Ecology, Spatial Planning and Urbanism has a marginal role and no interaction with procurement processes. The lack of political ownership and the dispersion of functions across under-resourced institutions have made GPP implementation sporadic and donor-dependent.

In Bosnia and Herzegovina, the situation is complicated by the country's decentralized governance structure. The Public Procurement Agency of BiH is responsible for regulatory oversight at the state level, but procurement is also managed at the entity and cantonal levels, with no unified GPP mandate or strategy. This fragmentation results in a situation where some municipalities may experiment with green procurement (typically in donor-funded contexts), but no formal institutional system exists to support, scale, or monitor such efforts.

North Macedonia

The Public Procurement Bureau is responsible for regulating procurement procedures but does not have a dedicated GPP function. Meanwhile, the Ministry of Environment and Physical Planning, though a relevant policy actor, has no mandate to influence procurement standards. This has led to a jurisdictional void, where GPP falls between two ministries, and no agency feels empowered or obligated to lead its implementation.

Serbia

The Public Procurement Office (PPO) and the Ministry of Environmental Protection operate in silos. While the PPO oversees procurement laws and procedures, it lacks the environmental expertise to define or promote green criteria. On the other hand, the environmental ministry has no influence over procurement regulations. The absence of an interministerial coordination mechanism exacerbates this divide, leaving GPP without a clear home.

Slovenia

Slovenia demonstrates a somewhat coordinated approach, with both the Ministry of Public Administration and the Ministry of the Environment and Spatial Planning involved

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in promoting and overseeing GPP. However, while these ministries have issued joint guidance and worked on some pilot initiatives, the institutional linkages remain informal and lack structured interministerial coordination mechanisms. Furthermore, local authorities often operate independently, and their integration into the national GPP system is limited or inconsistent.

Key Takeaways

Italy is the only country where GPP is anchored in an integrated and enforceable institutional structure. In all other ADRION countries, institutional fragmentation, lack of coordination, and unclear mandates severely undermine efforts to advance green public procurement. Without explicit and binding assignments of responsibility, GPP remains an optional, peripheral consideration rather than a strategic policy tool.

3.3 Skills and Knowledge Gaps Identified within Stakeholder Groups

Institutional capacity is not solely about organizational mandates. Skills, technical knowledge, and human capital are central to turning policy into practice. In all partner countries, **the lack of targeted, role-specific training** was cited as one of the most persistent challenges to GPP implementation recognized in stakeholder interviews.

<p>a) Contracting Authorities</p>	<p>The largest knowledge gaps are evident among procurement officers at the local level. Many interviewees, particularly in North Macedonia, Serbia, and Montenegro, reported that public buyers are unfamiliar with environmental criteria and lack confidence in applying them. Several noted that no structured training on GPP had been provided in the last five years, and some were not even aware of the possibility to include green specifications in tenders.</p> <p>In Greece and Slovenia, where some training programs have been introduced, the reach remains limited. Often, only central government agencies benefit from these programs, while municipal authorities are left without capacity-building support.</p> <p>In Bosnia and Herzegovina, the multi-layered governance structure further complicates training delivery, as there is no centralized mechanism for building procurement capacity.</p>
<p>b) Environmental Institutions</p>	<p>In many countries, staff in environmental ministries or agencies lack knowledge of procurement processes. This limits their ability to support the development of GPP criteria or provide technical advice to procurement officials. For example, in Montenegro, the Ministry of Ecology was unaware of ongoing</p>

	<p>procurement reforms, and in Serbia, the environmental ministry was not consulted on procurement policies.</p> <p>This institutional disconnect results in a loss of potential synergies, as the environmental authorities - who have the technical knowledge on sustainability - are not contributing to the procurement process, where that knowledge is urgently needed.</p>
<p>c) SMEs and Suppliers</p>	<p>SMEs across the ADRION region face their own knowledge gaps. Many suppliers, especially those operating in smaller cities or rural areas, do not understand the concept of GPP and are unprepared to respond to tenders that include environmental criteria. In Serbia and Bosnia and Herzegovina, suppliers often see GPP as a barrier rather than an opportunity, particularly due to the lack of familiarity with ecolabels, lifecycle costing, or sustainability reporting.</p> <p>Even in Italy and Slovenia, where supplier readiness is relatively high, SMEs still face challenges in adapting to the more technical or sector-specific environmental requirements. Without coordinated training for suppliers, GPP risks becoming a practice accessible only to large and well-resourced firms.</p>
<p>d) Civil Society and Academia</p>	<p>NGOs and academic institutions, which could serve as key partners in GPP promotion and training, are generally excluded from national GPP initiatives. Interviewees from civil society in North Macedonia, Greece, and Montenegro noted that they were willing to contribute to GPP education and awareness but were not invited to participate in policymaking or training development.</p> <p>The failure to mobilize these stakeholders limits the reach and diversity of GPP training and weakens its long-term sustainability.</p>

Table 3 Skills and Knowledge Gaps Mapped per Stakeholder Group

3.4 Stakeholder Feedback on Institutional Limitations – Interview Insights

Stakeholders across all partner countries consistently expressed concern regarding the institutional limitations that constrain the effective implementation of GPP.

These concerns extended beyond mere resource shortages, pointing instead to structural and systemic challenges that impede coordination, accountability, and leadership. The individual interviews conducted with stakeholders provided a particularly valuable lens

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into these issues. While the insights gathered were often fragmented and specific to local contexts, they nevertheless confirmed the broader trends identified in the overall analysis. Interviewees described recurrent problems such as unclear responsibilities, lack of institutional leadership, inconsistent guidance, and the absence of dedicated support structures.

For example, interviewees from municipal procurement departments in **Serbia and North Macedonia** noted that there is **no leadership or guidance from national institutions** on GPP.

In **Montenegro**, civil servants described **GPP as an “abstract concept”** because there is no institution responsible for explaining how it should be done. In Slovenia and Greece, stakeholders mentioned that while some support is available, it is “project-based and inconsistent,” lacking continuity or long-term strategy.

In **Bosnia and Herzegovina**, stakeholders described a **complete lack of institutional communication on the topic**. “No one coordinates GPP across the different levels of government,” said one cantonal-level official. “We only hear about it when a donor project comes.”

Interviews provided valuable insight into the perceived institutional limitations hampering GPP progress. The following recurrent themes emerged:

- “There is no single body responsible for GPP. Everyone assumes someone else will do it.” – Public procurement officer, Bosnia and Herzegovina
- “We don’t have clear communication channels between ministries. Environment and procurement are separate universes.” – Ministry representative, Serbia
- “We’re told to include green criteria, but no one explains how, and we’re afraid to get sued if we do it wrong.” – Municipal officer, North Macedonia
- “Even if we wanted to green our tenders, we have no knowledge or tools to evaluate offers properly.” – Procurement expert, Montenegro
- “Suppliers do not know how to prepare green offers. They just bid the lowest price.” – Chamber of Commerce, Greece

Key Takeaways

- Stakeholder feedback reinforces the view that institutional fragmentation and lack of ownership are more damaging than the absence of tools alone. Even when knowledge and resources exist in isolated pockets, the lack of coordination and formal responsibilities prevents their dissemination and application.
- These insights underline a widespread institutional unpreparedness, not from resistance, but from structural fragmentation, lack of communication between agencies, and weak coordination across levels of governance.

3.5 Lack of Dedicated Teams or Contact Points

A critical component of institutional capacity is the presence of dedicated personnel or units responsible for promoting and supporting GPP. Across the ADRION region, such structures are rare, if not entirely absent, outside of Italy.

Bosnia and Herzegovina, Montenegro, North Macedonia, Serbia

They do not have any GPP-specific units or staff at national or local levels. All procurement guidance is generalist in nature, with no specialization in environmental criteria or CE alignment.

Greece

It has committed to establishing GPP contact points under its national action plan, but at the time of research, these were not yet operational. Moreover, no framework has been announced to fund or train these contact points, raising concerns about their long-term viability.

Italy

Green Public Procurement is supported at the national level by dedicated teams within the Ministry of Environment and Energy Security (MASE), which coordinate and oversee the implementation of GPP. Alongside these institutional structures, key reference initiatives such as the *Forum Compraverde* provide platforms for exchange, monitoring, and stakeholder engagement. The mandatory nature of GPP, enforced through legal requirements, ensures a wide application of Minimum Environmental Criteria (CAMs). However, stakeholders have highlighted the need for further networking opportunities, shared references, and stronger channels for knowledge exchange to consolidate and expand these efforts.

Slovenia

While there is no formal “GPP teams,” designated contact persons within the Ministry of Environment and Ministry of Public Administration provide guidance. However, their limited capacity and the absence of local-level focal points restrict their impact.

Key Takeaways

In most ADRION countries, the lack of dedicated GPP units or staff undermines institutional capacity and continuity. Bosnia and Herzegovina, Montenegro, North Macedonia, and Serbia provide only generalist procurement guidance with no environmental focus. Greece has committed to creating contact points, but these remain non-operational and unfunded, while Slovenia relies on ministry contact persons with limited capacity and no local focal points. Italy stands out with dedicated teams in MASE, mandatory CAMs, and initiatives such as Forum Compraverde, though stakeholders still see a need for stronger networking and knowledge exchange. Overall, without dedicated structures, GPP efforts risk being fragmented and short-lived.

3.6 Summary Table by Country

Country	Institutional Mandate Clarity	Skills & Knowledge Capacity	Dedicated Teams or GPP Contact Points	Stakeholder Integration
Bosnia & Herzegovina	Very Low – Overlapping jurisdictions	Very Low – No training mechanisms	None – No focal teams at any level	Very Low – No coordination channels
Greece	Moderate – Action plan assigns roles	Medium – Some training efforts	Not yet – Focal points proposed, not active	Low – Limited NGO engagement
Italy	High – Clear mandates & coordination	Medium-High – Training institutionalized	Partially yes – National and regional GPP teams	Medium – Civil society partly involved
Montenegro	Very Low – Responsibilities diffuse	Very Low – Staff unfamiliar with GPP	None – No dedicated support staff	Very Low – Stakeholders disconnected
North Macedonia	Low – No clear institutional home	Low – No structured training	None – No focal points or units	Very Low – Stakeholders excluded
Serbia	Low – Fragmented between institutions	Low – Environmental agencies not engaged	None – No official responsibility	Very Low – No platform for feedback
Slovenia	Moderate – Dual ministry involvement	Moderate – Municipal staff undertrained	Partially – Limited to national level	Low – Academia not integrated

Table 4 Overview of Institutional and Organizational Gaps in GPP Implementation Across the Partner Countries

3.7 Gaps in Institutional and Organizational Capacities – Survey Findings

The survey conducted in A1.1. and A.12 provides additional insight regarding institutional and organizational challenges to hinder the adoption of Green Public Procurement (GPP) in the region. By gathering responses from policy makers, procurement officials, and suppliers across partner countries, the survey results highlight recurring weaknesses in role clarity, knowledge and skills, institutional support, and the presence of dedicated structures as presented below:

- **Challenges in Interpreting Regulations**

Survey results show that over 70% of respondents encounter difficulties in interpreting GPP laws and regulations. Specifically, 22.6% reported facing such issues frequently, while 49.6% experience them occasionally. Another 19.5% noted that their country does not yet have specific GPP legislation, reflecting a regulatory vacuum in several ADRION states. Only a small minority (8.3%) claimed they never face such challenges. This signals that the

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complexity and uneven existence of legal frameworks continue to pose barriers to smooth implementation.

- **Readiness of Procurement Staff**

When asked about institutional readiness, respondents gave a cautious assessment. Only 8.3% believe colleagues and procurement managers are “very ready” to apply GPP in practice, while 43.6% described them as “slightly ready”. About one quarter (24.1%) considered their peers “fairly ready,” whereas another 24.1% saw them as “not ready at all.” These results highlight that professional capacity across the region remains fragile, with most actors lacking confidence to integrate GPP consistently.

- **Organizational Priority of GPP**

Institutional culture also emerged as a gap. While 17.3% said GPP is a clear priority, a larger share (41.4%) felt it is only “somewhat a priority” and an equal proportion (41.4%) stated it is not considered a priority at all. This suggests that many organizations still view GPP as optional rather than a strategic requirement. Without explicit prioritization, implementation is likely to remain sporadic and dependent on individual initiative.

- **Monitoring Deficits**

Another critical weakness is the lack of monitoring systems. Over 71% reported that their organization does not track GPP implementation. Only 14.3% confirmed the existence of a monitoring system, while the same share admitted they did not know. This absence of structured monitoring means institutions lack both accountability and evidence for policy evaluation, undermining long-term improvement.

- **Barriers to Effective Implementation**

Respondents identified a set of tangible obstacles that limit their ability to apply GPP. The most common were:

Legal or regulatory uncertainties	28.6%
Lack of financial resources	19.6%
Lack of specific knowledge	16.5%
Resistance to organizational chan	14.3%
Difficulty finding qualified suppliers	12.8%
Llack of management support	3.8%
other contextual issues	4.5%

Table 5 Obstacles that limit their ability to apply GPP recognized in online survey

Key Takeaway

Barriers are multidimensional: institutions struggle with both systemic constraints (unclear rules, lack of suppliers) and internal factors (knowledge gaps, resistance to change, leadership disengagement).

All survey results are collected in Annex.

4. Gaps in Implementation Practices

4.1 Gaps in GPP Implementation: Operational and Monitoring Challenges

This chapter explores these operational challenges in detail - ranging from technical and market-related limitations to gaps in monitoring, reporting, and data systems. **While the regulatory and strategic frameworks for Green Public Procurement (GPP) are evolving across the region, their practical implementation remains fraught with operational and monitoring deficiencies.** Even in countries where GPP is formally recognized in legislation or policy, translating these ambitions into practice is hindered by a range of systemic barriers. These gaps affect not only procurement officers, but also market actors, oversight institutions, and ultimately, the capacity of public procurement to drive sustainable and circular economic transformation. By systematically identifying these issues, the analysis highlights the need for coordinated capacity-building interventions, institutional mandates, and cross-border cooperation to develop robust, interoperable systems that support GPP implementation across the macro-region.

4.2 Barriers in Practical Application of GPP

Despite growing awareness of the benefits of Green Public Procurement (GPP), practical application across the region faces persistent, systemic, and multifaceted challenges. These barriers cut across administrative, technical, and market dimensions, undermining the operationalization of GPP even in countries where legal and policy frameworks exist.

<p>a) Technical and Operational Challenges</p>	<p>Public procurement officers consistently highlighted the difficulty of translating green policy objectives into workable tender documents. While GPP is legally permitted in nearly all ADRION countries, the lack of clear procedures, predefined technical specifications, and validated criteria hinders implementation. Procurement departments, especially at the local level, are often overwhelmed by complex or vague legal language that does not translate into actionable procurement instructions.</p> <p>In Bosnia and Herzegovina, for example, some cantonal agencies expressed interest in using green criteria but reported they had “no institutional guidance” or access to centralized procurement advice. Similarly, Montenegrin stakeholders noted that technical staff lacked both legal training and environmental expertise, making GPP seem risky and time-consuming.</p>
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	<p>Municipal procurement staff in Serbia shared that the absence of standard environmental award criteria (e.g., on energy consumption or recycled content) often forced them to “guess” whether their interpretation would hold up legally if challenged. This legal uncertainty discourages innovation and results in risk-averse procurement behavior.</p> <p>The gap is further widened by limited staff numbers, especially in rural areas or smaller contracting authorities, where officers manage a large portfolio of responsibilities. These staff often lack time or resources to engage in additional training or to conduct market research into sustainable alternatives.</p>
<p>b) Supplier Readiness and Market Limitations</p>	<p>Procurement cannot succeed in isolation; it depends on a responsive and prepared market. Interviews across all countries revealed that many suppliers, particularly SMEs, are not ready to meet green procurement criteria. This is especially the case in the Western Balkans, where environmental certification is rare, and awareness of GPP among suppliers is extremely low.</p> <p>In North Macedonia, contracting authorities reported frequent failures in tenders that included green criteria, due to lack of bids meeting the requirements. In Serbia, some interviewees mentioned that GPP criteria were perceived as a barrier to competition, especially in rural and less-developed areas where few suppliers are able to comply with environmental standards.</p> <p>Even in more advanced contexts such as Greece or Slovenia, the green market is skewed toward larger or urban-based firms, exacerbating inequalities in public procurement opportunities.</p> <p>In Italy, however, the mandatory nature of GPP has acted as a market stimulus, encouraging suppliers to innovate and adapt. Over time, this has created a positive feedback loop where the demand for green products encourages greater supply, which in turn lowers costs and builds confidence among procurement professionals. Nevertheless, the full potential of the instrument has not yet been achieved, and the system appears to have reached a certain stalemate. Stronger market incentives would be needed to revitalize progress, as green products are not always sufficiently available or aligned with current demand and supply dynamics.</p>
<p>c) Lifecycle Costing and Evaluation Tools</p>	<p>Lifecycle costing (LCC) is a powerful instrument to justify the higher upfront cost of sustainable products by quantifying long-term savings in energy, maintenance, and waste.</p>

	<p>However, across the ADRION region, LCC remains almost entirely absent from procurement practice. Interviewees in Montenegro and Bosnia and Herzegovina admitted that “no one even talks about LCC” in public tenders, and there is “no software or methodology” available in local language. In Slovenia and Greece, LCC is acknowledged in theory but applied only in select central government procurements. This gap is compounded by insecurity in evaluating LCC-based bids. Without standardized tools or models—especially ones that comply with EU recommendations—many procurement officers avoid using LCC for fear of technical error or legal challenge.</p>
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Table 6 Barriers in Practical Application of GPP

Key Takeaways

The findings from interviews conducted in the partner countries underscore a shared struggle: institutional actors are often willing, but not adequately equipped to implement GPP effectively. Procurement practitioners face a lack of usable tools and templates, limited market readiness, and little to no technical capacity in applying lifecycle costing or evaluating circular performance. Furthermore, most national e-procurement platforms and reporting systems are not designed to capture or track GPP data, making impact measurement and policy evaluation nearly impossible.

Even when legal frameworks permit or encourage GPP, the operational environment is simply not equipped to deliver on those ambitions. Procurement staff need sector-specific guidance, legal protection, and the tools to translate sustainability targets into enforceable and successful tenders.

4.3 Gaps in Tools, Platforms, and Guidelines

Even where political will exists, GPP implementation cannot succeed without a robust set of supporting tools and platforms that enable consistent, transparent, and technically sound procurement procedures. Unfortunately, most project countries lack such a toolbox, making GPP implementation inconsistent or unfeasible in practice.

<p>a) Lack of Model Templates and Technical Specifications</p>	<p>Stakeholders across Serbia, North Macedonia, and Bosnia and Herzegovina repeatedly emphasized the absence of standardized tender documents or model clauses that could be used across institutions. Procurement officers often begin from scratch or adapt templates from donor-</p>
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	<p>funded projects—an approach that leads to duplication of effort and legal inconsistency.</p> <p>Even in Greece and Slovenia, where some tools exist, the materials are either too technical, outdated, or limited to a few sectors. None of the countries (except Italy) offer a comprehensive, regularly updated online repository of GPP documents.</p> <p>Italy’s Consip platform was widely praised during interviews, as it provides access to pre-approved CAM criteria, evaluation templates, and guidelines. Slovenia has also produced a GPP manual and sectoral guidance, although uptake remains inconsistent due to capacity constraints at the municipal level. Forum Compraverde provide insight as well and its a great tool regarding GPP practice. However stakeholders highlight the need of a more centralized and recognized monitoring system.</p>
<p>b) Underdeveloped Digital Platforms</p>	<p>Another major gap concerns e-procurement systems, which in most countries do not support GPP-specific functionalities. For instance, in Serbia and North Macedonia, the national procurement portals do not allow contracting authorities to flag GPP tenders or retrieve statistics on green procurement. As a result, even minimal data tracking becomes impossible.</p> <p>Greece’s ESIDIS platform represents a step forward, having integrated some environmental criteria in specific calls, but this remains limited and not yet scaled across all ministries or regions.</p>
<p>c) Language and Localization Barriers</p>	<p>Stakeholders also noted the lack of translated and localized tools. While the European Commission offers GPP criteria and guidance, many procurement officials cannot access or understand them due to language barriers or a lack of context-specific adaptation. This undermines uptake and results in fragmented, improvised efforts that rarely align with CE principles.</p>

Table 7 Gaps in Tools, Platforms, and Guidelines

4.4 Gaps and Barriers in Monitoring and Reporting

An essential component of successful GPP implementation is the ability to monitor and evaluate its uptake and impact. However, the ADRION region suffers from a profound deficit in monitoring systems, which undermines transparency, accountability, and long-term improvement.

<p>a) Lack of Mandatory Reporting Mechanisms</p>	<p>Italy remains the only country with a legally enforced GPP monitoring system, where ministries are required to report on their compliance with CAM and the share of green procurement. This allows for annual tracking, benchmarking, and refinement of policies based on real data. Despite this, monitoring remains a critical aspect also in the Italian context. Several stakeholders highlighted the lack of a proper official monitoring system (a good example mentioned is the Compraverde Forum). Moreover, many stakeholders pointed out in the interviews that the absence of a sanctioning system contributes to making the adoption of the GPP tool limited and partial.</p> <p>In all other countries, reporting is either voluntary, irregular, or entirely absent. Even in Greece and Slovenia—countries with GPP plans—reporting is non-mandatory and poorly coordinated across ministries. Public procurement authorities do not systematically collect or publish GPP data, making it difficult to assess whether national objectives are being met.</p>
<p>b) Lack of GPP Tags in Procurement Systems</p>	<p>One of the most significant operational barriers is the absence of GPP tagging functionalities in e-procurement platforms. Without a standardized way to label or categorize tenders as “green,” data collection becomes manual, fragmented, and highly error-prone.</p> <p>Interviewees from North Macedonia and Serbia highlighted that even when green criteria are used, they are not flagged in any national database, which means “there is no way to distinguish a green tender from a regular one.” This also means that ministries cannot evaluate their own progress, nor can external actors (NGOs, academia) conduct monitoring or advocacy based on reliable information.</p>
<p>c) Capacity Deficit in Monitoring Bodies</p>	<p>Where environmental ministries or procurement offices are tasked with oversight, they often lack both human and technical resources to analyze procurement data. In Bosnia and Herzegovina, the administrative complexity of overlapping jurisdictions makes unified monitoring virtually impossible. In Montenegro, no agency has been assigned the GPP monitoring function at all.</p> <p>In short, GPP is being implemented without feedback loops, depriving governments of essential insights and making it impossible to reward progress, identify underperformance, or adjust course.</p>

Table 8 Challenges in Monitoring and Reporting

4.5 Gaps in Data Availability and KPIs

The absence of monitoring systems leads directly to **an almost complete lack of reliable data or KPIs** for GPP implementation across the ADRION region. This data vacuum severely impairs the strategic management and evaluation of GPP efforts.

<p>a) No Quantified Targets or Benchmarks</p>	<p>With the exception of Italy, none of the partner countries have established quantitative targets for GPP adoption (e.g., % of tenders using green criteria, CO₂ saved, % CE products). Even where GPP plans exist, they often list aspirational goals without any measurable indicators.</p> <p>This makes it difficult to determine whether GPP is gaining traction or having any environmental or economic impact. Ministries cannot report to Parliament, donors cannot evaluate impact, and public institutions have no benchmarks for performance.</p>
<p>d) No Tools for Environmental Impact Assessment</p>	<p>None of the Western Balkan countries have developed or adopted tools that quantify the environmental impacts of GPP, such as carbon savings, reduction in energy use, or diversion of waste from landfills. This limits the perceived value of GPP and weakens the argument for broader implementation.</p> <p>In contrast, stakeholders pointed to Italy's efforts to link CAM criteria to environmental performance outcomes, providing a potential model for the rest of the region.</p>
<p>d) Lack of Disaggregated Data</p>	<p>Where data exists (e.g., in isolated reports or donor-funded evaluations), it is not disaggregated by sector, level of government, or type of procurement, making meaningful analysis impossible. This is a major obstacle to designing sector-specific training or interventions.</p> <p>To close this gap, countries must develop GPP dashboards with real-time indicators, linking tender-level data with environmental performance metrics. Only then can GPP be assessed as a serious policy tool rather than a legal formality.</p>

Table 9 Gaps in Data Availability and KPIs

4.6 Summary of the Implementation Gaps Across Region

The table below provides a comparative overview of key implementation gaps in GPP across the seven participating countries in the GPP2ADRION project. It synthesizes findings from stakeholder interviews and document reviews, focusing on the presence or absence of critical enablers of successful GPP: operational tools, supplier readiness, lifecycle costing, monitoring systems, and performance data.

Country	Operational Tools	Market Readiness	LCC Usage	Monitoring & Reporting	Data/KPIs Availability
Bosnia & Herzegovina	None – No GPP tools at all	Very Low – No green product signals	None – No practice or awareness	None – Fragmented jurisdictions	None – No KPI framework
Greece	Limited – Partial integration in e-systems	Medium – Uneven supplier access	Low – Technical challenges persist	Weak – Incomplete tracking	Low – No impact data
Italy	Moderate - Advanced - Available and partially used	Medium- High – Existing supplier ecosystem	Moderate – LCC tools in use in priority sectors	Strong – Monitored at national level	Moderate – CO ₂ , cost savings tracked
Montenegro	Minimal – NGO-driven efforts only	Low – Weak SME engagement	None – No capacity for LCC	None – No reporting	None – No centralized system
North Macedonia	Very Limited – No templates/tools	Low – SMEs underprepared	Very Low – No LCC practices	None – No monitoring mechanisms	None – No system or KPIs
Serbia	Limited – Fragmented and outdated	Low – Market not aligned	Very Low – No training/tools	None – No monitoring efforts	None – No data collected
Slovenia	Moderate – Available but unevenly applied	Medium – Some supplier preparedness	Low – Awareness but limited usage	Weak – No mandatory tracking	Low – No sectoral KPIs

Table 10 Summary Table of Implementation Gaps Across Regions

4.7 Gaps in Implementation Practices – Survey Findings

While regulatory frameworks and institutional capacities set the stage for Green Public Procurement (GPP), the real measure of success lies in its day-to-day implementation. The survey on GPP practices across ADRION countries highlights the practical challenges faced by procurement officials, policy makers, and suppliers when translating policy into action. These challenges range from financial and technical obstacles to market readiness and organizational culture.

The survey data provides a unique perspective by not only quantifying how often specific issues occur but also capturing the lived experience of stakeholders through open comments. This dual lens makes it possible to understand the complexity of implementation gaps: they are rarely the result of a single factor but rather a convergence of financial limitations, weak institutional support, limited supplier capacity, and low awareness.

The following sections analyze the survey findings in detail, pointing to the most persistent obstacles and the resources stakeholders believe are essential to overcome them.

- **Barriers in Applying GPP**

Survey responses reveal that stakeholders face multiple and overlapping barriers when attempting to apply GPP. While 15% emphasized regulatory inconsistencies, and 19% cited financial constraints due to lack of budget or green products, the largest share (23%) reported cognitive barriers such as lack of awareness and resistance to change. Notably, 38% selected “all of the above,” underscoring that barriers are systemic rather than isolated. Open comments further illustrate the challenge: staff shortages in municipalities, lack of harmonized national and EU criteria, and absence of legal or professional support for bidders all contribute to slow progress.

- **Cost Justification Difficulties**

One of the recurring issues is the difficulty in justifying the higher upfront cost of green products. Almost three-quarters of respondents reported facing this problem: 29% frequently and 44% occasionally. Only 9% stated they never encounter such difficulties, while 18% noted that GPP is not implemented in their country, removing the issue entirely. This signals both a budgetary challenge and a cultural hesitation to invest in long-term savings at the expense of short-term cost increases.

- **Supplier Identification Challenges**

A related barrier is the difficulty in identifying compliant suppliers. More than 60% of respondents reported encountering this problem (19% frequently, 44% occasionally). Only 23% said they never face such challenges, while 14% again reported GPP is not implemented nationally. Comments highlighted insufficient availability of certified green products, lack of trust in suppliers, and bureaucratic burdens that discourage both buyers and sellers from engaging in green procurement.

- **Organizational Challenges in Practice**

When asked about the biggest challenges organizations face, respondents pointed to:

- High costs (32%)
- Lack of knowledge (27%)
- Resistance to change (18%)
- Insufficient supplier options (11%)
- Other context-specific issues (12%)

The comments added nuance: resistance from internal staff, low capacity of personnel to dedicate time to GPP, weak governance commitment, and lack of explicit policies were frequently cited. Several respondents noted that GPP requires time and resources with uncertain outcomes, creating reluctance to prioritize it.

- **Needs for Support and Resources**

Respondents were clear about what would help them apply GPP more effectively. The most requested resources included:

- Detailed guidelines (26%)
- Access to experts or consultants (24%)

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- Digital tools for managing GPP (16%)
- Sector-specific training (14%)
- Case studies and best practices (12%)

The open comments reinforced the demand for practical, hands-on resources such as technical sheets, updated price lists, and example tender documents. Several participants stressed the importance of ongoing training and cultural change, highlighting that awareness-building and dissemination of best practices are as vital as technical tools.

5. Gaps in Stakeholder Engagement and Awareness

5.1 Lack of Targeted Communication or Training

The successful implementation of Green Public Procurement (GPP) relies not only on having clear policy frameworks in place, but also on ensuring that stakeholders can fully understand, apply, and tailor these principles in ways that fit their own procurement environments. While awareness of GPP exists among most stakeholder groups, both the interview and survey results highlight an ongoing shortfall in tailored communication and practical training support. This gap is threefold: a lack of skills (practical know-how to integrate GPP into day-to-day processes), limited availability of practical materials like step-by-step guidelines, user-friendly digital tools, and sector-specific examples, and insufficient support (continuous expert assistance, individualized advice, and hands-on training). Without addressing all three elements, GPP implementation may remain at a surface level, with policies known but not translated into meaningful changes in procurement processes.

The lack of tailored support is evident in multiple ways. Many stakeholders reported they receive only general awareness materials that do not reflect their specific procurement circumstances or sector-specific demands. Others say the training is too abstract and does not relate to the practical aspects of preparing tenders, evaluating bids, and monitoring compliance. Without clear, practical, and context-relevant guidance, even procurement staff who are committed to GPP, find it difficult to translate GPP principles into concrete and measurable criteria. Consequently, opportunities to drive sustainability through procurement are lost, and GPP is often seen more as a compliance requirement rather than a valuable tool for driving innovation and improving the environment.

Closing this gap is therefore a key priority for both overall strategy and practical implementation. The results from both the interviews and the online survey clearly show that various stakeholder groups require tailored support such as step-by-step guidance, detailed instructions, expert guidance, and digital tools for GPP management. Fulfilling these needs is essential to move from GPP awareness to applying it consistently and competently across all procurement levels.

5.2 Insights from two complementary approaches

Both the interview results and the online survey findings point to the same conclusion - the stakeholders are not struggling due to lack of awareness or understanding of GPP, but because of communication (how the information about GPP is shared with stakeholders – including content, format, and delivery of the information, for example, awareness materials, official notices about GPP requirements, newsletters, policy updates or briefings explaining changes in GPP rules, webinars, workshops introducing the concepts, guidelines and manuals) as well as trainings they receive (these are not adapted to their specific roles or sectors, lack practical, real-world examples, and are not provided on an ongoing basis). This common trend is evident across different stakeholder groups and stages of procurement, therewith, highlighting several key dimensions of the problem.

- **Need for practical, tailored resources**

Stakeholders repeatedly pointed out that general awareness training alone is insufficient. They require clear, detailed, practical guidance tailored to the procurement categories, regulatory obligations, and day-to-day operational challenges they encounter. This need is not simply about having more hours of training, but for resources that are better tailored, practical, and can be easily translated into practice. For instance, procurement staff seek to have ready-made tender templates, sector-relevant criteria, and clear guidelines on how to apply GPP requirements in their specific situations.

- **Need for ongoing expert support**

Findings from both methods demonstrated that stakeholders perceive GPP as a complex, evolving practice, which requires ongoing learning and adaptation. As a result, single training events often fail to cover all necessary aspects. There is a clear demand for having access to experts who can support to resolve real-time challenges, clarify interpretation of criteria, and tailor solutions to particular procurement contexts. This suggests that stakeholders would benefit more from mentorship-like arrangements or advisory ‘helplines’ instead of static training modules.

- **Need for industry-tailored messaging**

A “one-size-fits-all” approach to GPP communication does not align with the needs of different industries, procurement categories, or levels of public administration. For example, national public authorities may seek strategic advice on integrating GPP into high-level policies, whereas regional procurement teams often require step-by-step guidance for running local tenders. SMEs and industry stakeholders often need tailored communication (information and advice) on how to be ready for the market (for example, understand GPP requirements relevant to their sector, adapt products or services to meet environmental criteria, prepare documentation and certifications, capacity to deliver on GPP contracts) and meet compliance obligations from the supplier’s perspective (e.g. which certifications or environmental standards they need, how to prove compliance during bidding, how to continue meeting obligations while delivering goods or services, the documentation they need to keep and audits they may face). Without appropriate

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content, existing communication feels irrelevant and disconnected from practical procurement challenges.

- **Need for tools and systems**

Stakeholders do not see training as a standalone solution. They require digital platforms, checklists, procurement management tools that seamlessly integrate GPP requirements directly into their daily processes. This is viewed as essential to standardize GPP practices and minimize variations that result from personal judgment. The findings from both methods show that despite training, even well-trained staff still face challenges in effectively implementing GPP.

- **Need for real-world examples**

Case studies and examples of successful, context-specific GPP applications have been identified as a key necessity. Stakeholders seek opportunities to learn from peers, see how similar organizations have overcome barriers, and understand real-world benefits of applying GPP standards. Findings from both methods show that practical examples are seen as more useful and confidence-boosting compared to training that is purely theoretical or policy-driven.

Key Takeaways

Both interview and online survey results illustrate that the issue is not a lack of communication, but rather communication that fails to address specific needs.

Existing communication and training tend to be too generic, offer limited practical guidance and ongoing support. Stakeholders seek to move from abstract concepts to practical application; therefore, communication and training must be practical, personalized, ongoing, and fully integrated into procurement operations. Without this shift, GPP practice may remain superficial and inconsistent, regardless of the level of policy commitment.

5.3 Detailed stakeholder-specific analysis

To better understand the nature of these gaps, it is important to assess how they affect various stakeholder groups differently – from public national and regional/local authorities to industry and SMEs, academia and research organizations, and other actors. They each encounter unique challenges, resource needs, and capacities to translate GPP into practice.

Stakeholder group	Lack of targeted communication/training	Specific needs	Insights from interviews and survey
Public National Authorities	Strong understanding of GPP, however, they lack to provide to procurement practitioners concrete, hands-on guidance on	National policymakers to create tailored frameworks that clearly communicate GPP requirements to stakeholders, complemented by training	Request by stakeholders for sector-specific examples and unified communication templates to better explain how national policies

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	how to put these principles into practice.	programmes aligned with national priorities.	translate to local implementation.
Public Regional/Local Authorities	Struggle to adapt national GPP policies effectively due to insufficient region-tailored guidance and materials.	For sector-specific training and guidance that addresses the practical realities of regional procurement, complemented by ongoing expert assistance.	Demand for practical, real-world examples and digital tools to integrate GPP into regional procurement workflows.
Industry / SMEs	Limited access to practical, tailored information for specific products and services; unclear procurement expectations.	Step-by-step guidelines, sector-specific case studies, interactive training, and expert advice for compliance support.	Strong need for easy-to-use communication to help procurement teams and suppliers embed GPP criteria into competitive bidding processes and supply chain activities
Academia / Research	This group demonstrated conceptual understanding of GPP without practical application; they show weak links to procurement practice	Collaborative platforms that facilitate the translation of academic research into practical tools and guidelines, supported by case studies demonstrating practical results from applying GPP principles.	Highlighted the need for practical tools and case studies that bridge theoretical knowledge with real-world procurement applications.
Others	Face difficulties in coordinating between different stakeholders involved in GPP. They highlighted that continuous efforts to change organizational culture and promote ongoing knowledge exchange to improve communication and training are needed.	Adaptable communication approaches, supported by peer learning groups, to promote continuous awareness and the sharing of best practices.	Highlight importance of continuous tailored support beyond one-time training for sustained GPP adoption.

Table 11 Summarizing the lack of targeted communication and training per stakeholder group

5.4 Recognized segments of gaps - Insights from Interviews

The interviews conducted across partner countries revealed that different stakeholder groups experience distinct but complementary challenges in applying GPP, pointing to specific gaps and needs that must be addressed through tailored support measures.

- **Policymakers – From Goals to Practice**

The problem shared across stakeholder groups does not stem from insufficient GPP communication or training, but from the lack of support in addressing the real-world challenges of applying GPP. Policymakers in particular need tools to translate high-level goals into practical, operational guidance that can be implemented consistently on the ground.

- **Procurement Practitioners – Need for Practical Resources**

Procurement officers require practical resources, sector-specific guidelines, and ongoing expert support to move from awareness to consistent GPP application.

- **Industry and SMEs – Demand for Simple Templates**

SMEs and industry actors seek simple, ready-to-use templates and straightforward instructions that would make GPP easier to apply, enabling them to bid for contracts with confidence without facing complex or ambiguous guidelines.

- **Academia and Research – Co-Development of Solutions**

Academic and research institutions stress the importance of working alongside practitioners to co-develop resources that are evidence-based yet adapted to real-world procurement needs.

- **Other Stakeholders – Need for Cultural Change and Networks**

Beyond technical tools, stakeholders highlight the importance of cultural change, peer-to-peer learning, and knowledge-sharing networks to embed GPP values into everyday practice and strengthen long-term commitment.

Key Takeaway

While general awareness of GPP is widespread, without tailored, practical communication and training that tackle actual implementation issues, GPP could be viewed merely as a box-ticking requirement rather than an effective tool to accelerate innovation and sustainability. Tailored guidance, ongoing expert access, and sector-specific tools are pivotal for moving from awareness of GPP to its practical, effective application. Findings show that the focus should be on enhancing training quality and its relevance rather than simply increasing the number of sessions.

5.5 Gaps in Stakeholder Engagement and Awareness – Survey Findings

Effective implementation of Green Public Procurement (GPP) depends not only on institutional frameworks and technical tools but also on the engagement and awareness of key stakeholders. Procurement officials, policy makers, and suppliers all play a crucial role in creating an environment where sustainable purchasing becomes the norm. However, the survey conducted within the GPP2ADRION project reveals persistent gaps in knowledge, communication, and motivation across these groups. The findings highlight that while awareness of GPP is growing, it remains partial and fragmented, and suppliers - especially SMEs - face barriers that prevent full and confident participation.

- **Awareness of EU Guidelines and Criteria**

When asked about the European Commission's guidelines and recommendations on GPP, only 31.6% of respondents stated they were familiar with them. A larger group (47.4%) had merely "heard of them" without knowing the details, while nearly 19% were not aware at all. A small fraction (2.3%) reported not knowing where to access the guidelines. Awareness of the Commission's proposal for minimum mandatory GPP criteria was even lower: fewer than 28% were familiar, and 30.8% said they were not aware

at all. These results reveal a significant information gap that directly undermines consistent application across the region.

- **National Legal Framework Awareness**

Survey participants were also asked about the clarity of laws supporting GPP in their countries. Just 27% reported that clear laws exist, while the majority (52.6%) acknowledged laws but described them as “unclear.” Another 20.3% indicated that there were no specific laws at all. This widespread uncertainty reflects not only gaps in regulation but also in how information is communicated to practitioners and suppliers.

- **Incentives for Supplier Involvement**

Suppliers, particularly SMEs, remain cautious about engaging in GPP. Respondents identified several potential incentives:

- Financial incentives were the most frequently cited (28.6%).
- Greater clarity in selection criteria was close behind (25.6%).
- Training and support for suppliers (18.8%) and networks/platforms for green suppliers (11.3%) also ranked high.
- Regulatory obligations received less support (12%), with some comments cautioning against imposing them prematurely.

Qualitative feedback provided additional nuance: several respondents suggested that simplification of tendering procedures, promotion of supplier networks, and increased visibility of sustainable products could be powerful motivators. Others stressed that a combination of financial incentives and transparent criteria would help suppliers feel more confident in investing in green solutions.

- **Support Needs for SMEs**

When asked what support SMEs need to participate effectively in GPP, respondents highlighted:

- Financial support or incentives (37.6%).
- Improved training programs (24.1%).
- Supplier networks/platforms (18.8%).
- Access to clear information on GPP regulations (16.5%).

Comments further emphasized the need for legal support, given the complexity of public procurement regulations, and called for better branding and promotion of regional green products. Respondents highlighted that SMEs require not only financial and technical support but also recognition and visibility in order to strengthen their market position.

6. Gap Patterns Across the ADRION Region

6.1 Gap Pattern Collected in Interviews

The implementation of Green Public Procurement (GPP) across the ADRION region reveals a landscape marked by fragmentation, uneven progress, and significant institutional inertia. While certain countries such as Italy and Slovenia demonstrate more advanced frameworks, most partner countries continue to struggle with foundational challenges—ranging from regulatory inconsistencies to institutional capacity shortages and limited practical application. This chapter summarizes the key common, country-specific, and cross-cutting gaps in GPP adoption and implementation, grounded in the interviews and benchmark analysis conducted during the first phase of the GPP2ADRION project.

6.1.1 Common Gaps

The analysis across all seven partner countries - Italy, Slovenia, Greece, North Macedonia, Serbia, Montenegro, and Bosnia & Herzegovina - reveals a series of shared deficiencies that inhibit the effective mainstreaming of GPP:

<p>Lack of Institutional Mandates and Coordination:</p>	<p>In most countries, GPP lacks a clearly assigned lead institution. Public procurement is typically governed by finance ministries or central procurement bodies, while environmental considerations fall under separate entities with little coordination. This disconnection creates institutional grey zones where responsibility for implementing green criteria is ambiguous or entirely absent.</p>
<p>Inadequate Skills and Capacity Among Public Buyers</p>	<p>: A universal challenge across all partner countries is the limited expertise among procurement officers regarding environmental criteria, lifecycle costing, and the integration of circular economy principles. Training, when available, is often ad hoc and not part of mandatory professional development.</p>
<p>Absence of Dedicated Support Structures</p>	<p>With the exception of Italy, none of the partner countries have functional, well-staffed GPP focal points or help desks at national or regional level. The lack of dedicated personnel undermines consistency in implementation and limits access to hands-on technical assistance.</p>
<p>Low Supplier Readiness and Private Sector Engagement:</p>	<p>SMEs and suppliers across the region are generally unfamiliar with GPP requirements, particularly the use of ecolabels, environmental certifications, and sustainability</p>

	documentation. This limits competition and innovation in green tenders.
Insufficient Monitoring and Evaluation Mechanisms:	Across the region, there are no standardized tools for tracking GPP uptake or performance. Most countries lack baseline data on how many tenders include green criteria or the environmental outcomes of such procurements.
Weak Policy Integration of Circular Economy (CE)	Despite broad policy support for CE across the EU and EUSAIR strategies, its practical integration into procurement procedures is minimal. GPP and CE remain two parallel but disconnected discourses in most ADRION countries.

Table 12 Common Gaps segmentation

These shared patterns point to systemic barriers requiring coordinated interventions, both at national level (policy reforms, institutional development) and transnational level (capacity building, knowledge exchange, and harmonized guidance).

6.1.2 Country-Specific or Contextual Gaps

While several challenges are common across the region, each country also faces unique or context-specific gaps that must be addressed through tailored interventions.

Bosnia & Herzegovina

The most complex governance structure, with multiple procurement authorities across entity and cantonal levels. This fragmentation severely hinders any attempt at a unified GPP strategy or implementation framework.

Greece

A GPP Action Plan is in place, but implementation is delayed by the lack of functional focal points and budgeted training structures. The role of environmental authorities in procurement remains passive, and CE considerations are still marginal.

Italy

Despite being the most advanced in institutional and legal frameworks, challenges remain in ensuring consistency across all municipalities, especially in southern regions. Monitoring and enforcement capacities need further development. While the normative framework is well constructed, there is the need for practical support.

Montenegro

Very limited awareness and institutional presence of GPP. Procurement is highly centralized, and no guidance or tools are available for local authorities to adopt environmental criteria.

North Macedonia:

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The policy and legal basis for GPP is underdeveloped. Institutional mandates are not clearly defined, and both public buyers and suppliers lack awareness. GPP is seen as a donor-driven concept, not a national priority.

Serbia

The institutional disconnect between procurement and environmental authorities is acute. There is no mandatory requirement to use green criteria, and GPP is largely unknown at the municipal level.

Slovenia

Coordination between ministries is still informal, and municipal-level uptake of GPP varies widely. Suppliers outside key urban areas remain largely unprepared to compete for green tenders.

Key Takeaway

These national-specific observations emphasize that capacity-building and technical support must be context-sensitive, taking into account institutional culture, administrative structures, and policy maturity levels.

6.1.3 Cross-Cutting Issues

In addition to the shared and country-specific gaps, several cross-cutting issues have been identified that transcend individual national boundaries and institutional configurations:

- **Fragmentation of Responsibilities:**

Whether at the national or sub-national level, fragmentation is one of the most pervasive barriers. In many cases, ministries of environment, economy, and public administration operate in silos without mechanisms for coordination or data sharing.

- **Dependence on External Funding and Donor-Led Initiatives:**

Particularly in the Western Balkans, GPP advancements are often initiated through EU or international donor projects. This dependency limits continuity, as there is no institutional absorption or sustainability once external support ends.

- **Lack of Integration in Education and Training Systems:**

Professional training for procurement officers rarely includes GPP or CE principles. Similarly, higher education institutions do not offer GPP modules in public administration or economics curricula.

- **Digitalization Without Sustainability Orientation:**

While several countries are upgrading digital procurement systems, these platforms rarely include features to support GPP, such as filters for green criteria or data fields for lifecycle costing.

- **Weak Civil Society and Academic Involvement:**

Despite the relevance of civil society in promoting transparency and of academia in producing knowledge, both stakeholder groups are largely excluded from the GPP ecosystem. Their involvement remains informal or project-dependent.

Key Takeaway

These cross-cutting issues highlight the need for **systemic reform and cultural change** within public procurement systems—beyond technical fixes—to align them with sustainability goals and circular economy values.

6.1.4 Comparative Summary Table

The following table provides a **condensed overview** of the key GPP implementation gaps by country, grouped under major thematic dimensions:

Country	Regulatory/Policy Gaps	Institutional Gaps	Capacity Gaps	Monitoring Gaps	Supplier Readiness
Italy	Minor (CAMs well-established)	Low – Clear mandates and structures	Medium – some gaps exist	Medium – Inconsistent regional data	Medium – Varies by region and sectors
Slovenia	Moderate – Partial CE integration	Medium – Informal coordination	Medium – Local gaps persist	High – No tracking of outcomes	Medium – Urban–rural divide
Greece	Moderate – Delayed implementation	Medium – Action Plan not operational	High – Focal points not established	High – No standard KPIs	Medium – Awareness gaps
North Macedonia	High – Weak legal base	High – No clear institutional lead	High – No training or guidance	Very High – No baseline data	High – Low awareness
Serbia	High – No GPP obligations	High – Disconnected authorities	High – Lacks training system	Very High – Not monitored	High – Limited CE knowledge
Montenegro	Very High – No GPP framework	Very High – No responsible body	Very High – No procurement training	Very High – Absent M&E	High – Market not prepared

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Bosnia & Herzegovina	Very High – Fragmented systems	Very High – Multi-layered governance	Very High – No GPP knowledge	Very High – No national statistics	Very High – Limited engagement
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Table 13 Summary of GPP Gap Patterns Across ADRION Countries

This table reinforces the earlier analysis that while Italy and Slovenia are relatively advanced, all other countries show severe or very severe gaps across at least four of the five identified dimensions. These findings call for urgent and differentiated support, informed by both common needs and contextual realities.

6.2 Survey findings about Gap Patterns across the ADRION Region

The ADRION region has made gradual progress toward embedding Green Public Procurement (GPP) into public sector practice. However, the survey results reveal that while policies and strategies are advancing, significant gaps remain in their institutional, operational, and stakeholder dimensions. Understanding these gaps in a comparative, regional perspective is crucial: it highlights not only where countries share common challenges but also where national contexts diverge, and where coordinated regional solutions might accelerate adoption. This section synthesizes survey findings from three thematic areas—institutional capacities, implementation practices, and stakeholder engagement and awareness—to provide a comprehensive picture of gap patterns across the ADRION region.

6.2.1. Common Gaps Across the Region

Across all three survey areas, a set of structural weaknesses consistently appear.

Regulatory and institutional uncertainty	In most ADRION countries, laws exist but are perceived as unclear, inconsistently applied, or weakly enforced. Even where GPP is mentioned in strategic documents, survey respondents noted ambiguity about mandates and responsibilities.
Skills and knowledge limitations	Procurement staff, policy makers, and suppliers alike highlighted insufficient training. Most rated themselves as only slightly or fairly ready to apply GPP, with little prior exposure to lifecycle costing or environmental criteria
Weak monitoring systems:	Over 70% of respondents reported that their organizations do not monitor GPP implementation, indicating a systemic accountability gap.

Low organizational prioritization	Roughly four in ten respondents across the region felt that GPP is “not a priority” in their institutions. This cultural gap undermines motivation and creates reliance on individual champions.
Financial and market barriers	High upfront costs of green products and limited supplier readiness were consistently reported as obstacles. Respondents emphasized difficulties in justifying higher costs and identifying compliant suppliers.
Stakeholder awareness deficits:	Fewer than one-third of respondents were familiar with EU guidelines or mandatory criteria. Awareness of national frameworks was also low, with many describing them as unclear or absent.

Table 14 Common Gaps across the Region

Key Takeaway

The list of gaps indicate that the region shares a foundational set of gaps that reinforce each other: unclear rules, weak skills, low priority, poor monitoring, limited markets, and insufficient awareness.

6.2.2 Country-Specific and Contextual Differences

While the overall pattern is consistent, the survey also highlights **national-level variations**.

- **EU member states (Italy, Slovenia, Greece):**

These countries generally reported clearer legal frameworks and somewhat higher levels of institutional readiness. Italy, in particular, stands out with more structured GPP provisions, yet even here monitoring is uneven and financial barriers persist.

- **Western Balkan states (Serbia, Montenegro, Bosnia & Herzegovina, North Macedonia):**

Respondents here more often reported **absence of legislation**, low awareness of EU criteria, and limited supplier markets. For example, in Montenegro and North Macedonia, many respondents stated that GPP is not implemented at all, reflecting the slower institutionalization of the practice.

- **SME-specific contexts:**

Suppliers in Western Balkan countries were especially vocal about lacking support and incentives to participate in GPP. They cited insufficient training, lack of supplier networks, and absence of clear guidelines.

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These differences show that while all ADRION countries face barriers, non-EU members experience them more acutely, reinforcing the need for targeted capacity building and tailored support in those contexts.

6.2.3 Cross-Cutting Issues

The survey also points to several cross-cutting issues that link institutional, operational, and stakeholder gaps.

- **Communication and coordination gaps:**

Across all areas, respondents emphasized poor communication between procurement bodies, environmental authorities, and suppliers. This weakens trust and creates parallel interpretations of GPP rules.

- **Resistance to change:**

Both procurement officials and suppliers noted cultural barriers—perceptions that GPP is burdensome, risky, or secondary to immediate cost-saving pressures. This resistance feeds into weak organizational prioritization.

- **Absence of dedicated support structures:**

The lack of GPP contact points or specialized teams was a recurring theme, leaving procurement staff without guidance and suppliers without a reliable source of information.

- **Need for practical resources:**

Stakeholders consistently requested not only training but also **hands-on tools**—guidelines, technical sheets, model tenders, case studies, and digital platforms. This reflects the gap between high-level policy ambition and day-to-day operational needs.

Key Takeaway

These cross-cutting issues suggest that closing gaps requires more than individual reforms: it demands integrated approaches that connect laws, institutions, training, markets, and awareness into a coherent system.

7. Market Needs and SME Readiness for GPP

The analysis across partner countries highlights that market actors—particularly small and medium-sized enterprises (SMEs)—face significant barriers in engaging with Green Public Procurement (GPP). While SMEs represent the backbone of the ADRION region’s economies, their participation in green tenders remains limited due to financial, technical, and informational constraints.

- **Low Awareness and Understanding of GPP Requirements**

A consistent finding is the lack of awareness and understanding of GPP requirements among SMEs. Many companies are unfamiliar with recognized green standards, certifications, or ecolabels, and are uncertain about how to demonstrate compliance in tendering processes. Procurement requirements are often perceived as complex or unclear, leading to the widespread belief that “green tenders are not for us,” with SMEs assuming that larger firms have structural advantages, such as economies of scale, diversified portfolios, and established environmental management systems (e.g., ISO 14001).

- **Financial Barriers and Priority Needs**

Financial barriers remain the most critical obstacle. SMEs report that adapting to GPP requires investments in new technologies, organizational processes, or certifications—costs that are perceived as high and risky in the absence of predictable demand. Survey data confirm that financial support and incentives are the most frequently cited need (37.6%), followed by improved training programmes (24.1%), the establishment of supplier networks/platforms (18.8%), and better access to clear information on GPP regulations (16.5%) .

- **Need for Legal and Technical Support**

In addition, SMEs emphasized the need for legal and technical support to navigate the complexity of procurement procedures. Comments from the survey and interviews revealed that simplification of tendering requirements, promotion of supplier networks, branding of regional green products, and better visibility of sustainable solutions would increase confidence and reduce entry barriers for smaller firms.

- **Differences in Market Maturity Across the Region**

Market maturity varies significantly across the region. In Italy, the mandatory nature of GPP has stimulated innovation and created a positive feedback loop where demand has encouraged suppliers to adapt and expand green offerings. In contrast, in the Western Balkans, supplier readiness remains low, with contracting authorities frequently reporting failed tenders due to a lack of bids that meet environmental requirements. Even in more advanced contexts such as Greece and Slovenia, the green market is skewed toward larger or urban-based firms, exacerbating inequalities in procurement opportunities.

7.1 Key Groups of Market Needs of SMEs for Engaging in GPP

Market Need	Description	% of respondents
Financial support and incentives	Subsidies, grants, or fiscal incentives to cover costs of certification, innovation, or compliance with green criteria.	37.6%
Training programmes	Targeted capacity-building on GPP requirements, standards, tendering procedures, and circular economy opportunities.	24.1%
Supplier networks and platforms	Platforms to connect SMEs with buyers and other suppliers, enabling partnerships, knowledge exchange, and clustering.	18.8%
Clear information on regulations	Simplified, accessible, and transparent guidance on GPP rules, criteria, and available opportunities.	16.5%
Recognition and branding of products	Visibility and promotion of sustainable products and services at regional or EU level.	3.0%

Table 15 Key Market Needs of SMEs for Engaging in GPP (Based on Survey Results)

Key Takeaway

SMEs across the ADRION region require a mix of financial incentives, simplified procedures, targeted training, access to networks, and recognition of their products in order to compete more effectively in green tenders. Addressing these market needs is crucial not only for widening participation in GPP but also for ensuring that procurement becomes a driver of innovation, competitiveness, and the circular economy transition.

8. Concluding Overview and Next Steps

The findings of this Gap Analysis confirm that Green Public Procurement (GPP) in the ADRION region is hindered by systemic, multi-level challenges that cut across regulatory, institutional, operational, and stakeholder dimensions. Despite progress in frontrunner countries such as Italy and Slovenia, the region as a whole faces persistent gaps in policy coherence, institutional capacity, monitoring mechanisms, and market readiness.

Across all chapters, a recurring theme is the gap between policy ambition and practical implementation. While legal frameworks increasingly acknowledge GPP, they remain largely voluntary and weakly enforced outside of Italy. Institutional fragmentation, unclear mandates, and limited coordination between procurement and environmental authorities prevent effective leadership. Skills and knowledge deficits persist among procurement officers, suppliers, and SMEs, with few structured training opportunities and weak familiarity with environmental criteria.

Implementation is further constrained by the lack of practical tools, standardised templates, lifecycle costing methodologies, monitoring systems, and reliable data. Stakeholder engagement remains partial and fragmented: SMEs often lack the support needed to enter green markets, academia and civil society are sidelined, and local procurement teams face resource shortages.

Nevertheless, opportunities exist. Italy's structured approach and Slovenia's policy progress provide models for replication. Pilot initiatives in other countries demonstrate proof of concept, and survey results indicate stakeholder willingness to engage if provided with the right tools, incentives, and continuous support. The cross-regional perspective confirms that while national contexts differ, challenges are largely shared—creating scope for joint solutions and macro-regional cooperation.

8.1 Key Sets of Conclusions

The Gap Analysis highlights five overarching conclusions:

- 1) Regulatory frameworks remain weak and fragmented, with most countries lacking mandatory provisions and alignment between procurement law, circular economy strategies, and environmental legislation.
- 2) Institutional capacity is limited, characterized by unclear mandates, insufficient interministerial coordination, and the absence of dedicated teams or focal points.
- 3) Operationalization of GPP is underdeveloped, with procurement officials struggling to translate high-level objectives into tender criteria and suppliers unprepared to respond effectively.
- 4) Monitoring and data systems are absent, leaving no accountability or evidence base for evaluation and improvement.

- 5) Stakeholder engagement is partial, with SMEs, civil society, and academia insufficiently involved in the GPP ecosystem and capacity-building efforts.

At the same time, there is growing political recognition, a number of good practices, and strong potential for peer learning and cooperation across the region.

All stakeholder levels are impacted:

- 1) Policy makers require clear guidance and training to integrate GPP into strategic frameworks.
- 2) Procurement practitioners need practical, workflow-integrated tools and support to apply green criteria with confidence.
- 3) SMEs require financial incentives, simplified procedures, and recognition to compete in green tenders.
- 4) Civil society and academia should be engaged as multipliers for awareness, training, and monitoring.

8.2 Strategic Recommendations

- Strengthen regulatory frameworks: move from voluntary to mandatory GPP, align procurement and CE legislation, and introduce monitoring obligations.
- Build institutional capacity: clarify mandates, improve coordination, and establish dedicated teams or focal points.
- Provide practical tools and training: develop guidance, templates, and digital resources, supported by sector-specific training.
- Establish monitoring and data systems: introduce performance indicators and reporting mechanisms to evaluate and improve GPP uptake.
- Foster stakeholder engagement and networks: involve SMEs, academia, and civil society, and consolidate cooperation through a transnational GPP network.

8.3 Opportunities

- Frontrunner examples in Italy and Slovenia demonstrate that structured policies and mandatory criteria can drive market change.
- Pilot initiatives and growing political recognition provide starting points for replication.
- Survey and interview results reveal stakeholder willingness to engage if provided with clear guidance, tools, and incentives.
- Strategic Directions

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- Strengthen regulatory frameworks by moving from voluntary to mandatory GPP and aligning laws with CE objectives.
- Build institutional capacity through clarified mandates, coordination, and dedicated contact points.
- Equip practitioners and suppliers with practical tools, sector-specific templates, and training.
- Establish monitoring systems with performance indicators and reporting mechanisms.
- Foster networks and engagement, actively involving SMEs, academia, and civil society, and formalizing a transnational GPP network.

8.4 Next Steps

To build on these findings, the following directions will guide the upcoming phases of the project:

- 1) **Capacity Building (A1.3):** Deliver targeted training and practical tools for policy makers, procurement practitioners, SMEs, and civil society, focusing on sector-specific templates, lifecycle costing, and monitoring methods.
- 2) **Contact Point Activities (A1.4):** Establish national-level GPP contact points to provide ongoing advisory support and continuity beyond project-based initiatives.
- 3) **Transnational Network (A2.2):** Formalise a regional GPP network to promote peer-to-peer exchange, dissemination of best practices, and shared learning across ADRION countries.
- 4) **Integration into WP2 and WP3:** Ensure results inform policy recommendations (WP2) and communication/dissemination strategies (WP3), scaling pilot initiatives and aligning national practices with EU priorities.

In summary, the Gap Analysis Report offers a comprehensive cross-regional overview of barriers and opportunities for GPP, and, together with the Benchmark Analysis, ensures that the next steps of GPP2ADRION are evidence-based, targeted, and strategically positioned. By addressing regulatory weaknesses, institutional fragmentation, and market barriers, while equipping practitioners and SMEs with the tools they need, the project can move the region from fragmented experimentation toward systematic, impactful Green Public Procurement as a driver of the circular economy.

ANNEXES

The content of this Annex corresponds to the Annex already included in Deliverable D1.1.1 “Benchmark Analysis Report”. For completeness and consistency, the same list is hereby reproduced in this document.

- 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