

Position Paper

Revision of the Public Procurement Framework

Executive summary

This contribution sets out EUnited's views on the revision of the EU public procurement framework, based on input from manufacturers active in municipal equipment, cleaning machines, and vehicle wash systems. EUnited supports the use of public procurement as a strategic tool to promote sustainability, innovation, and resilience, if rules remain technology-neutral, proportionate, and workable in practice.

EUnited highlights:

- the need for harmonised and market-ready sustainability criteria,
- the importance and practical limitations of Total Cost of Ownership (TCO) methodologies,
- the need to move beyond lowest-price award criteria to better support innovation and lifecycle performance,
- the importance of transparency and interoperability in digital procurement systems,
- alignment of procurement requirements with existing EU digital and cybersecurity legislation,
- and the need for greater EU-level harmonisation to ensure legal certainty and crossborder participation.

Introduction

EUnited represents European manufacturers active in municipal equipment, cleaning machines, and vehicle wash systems. Our members supply essential equipment and systems to public authorities across the European Union, including municipalities, public service operators, and publicly owned transport and waste-management entities.

Public procurement therefore plays a decisive role for our sectors. For many EUnited members, public authorities represent a core customer group, meaning that procurement rules directly influence investment decisions, product development, innovation pathways, and long-term competitiveness.

The revision of the EU public procurement framework offers an important opportunity to strengthen sustainability, innovation, and strategic autonomy, while ensuring that procurement rules remain workable, technology-neutral, and proportionate.

General Observations

EUnited supports the objective of using public procurement as a strategic instrument to support sustainability, innovation, and resilience. Public procurement can play an important role in supporting policy objectives while delivering long-term value for public authorities.

At the same time, our members' experience shows that procurement practices across the EU remain highly fragmented and are often still predominantly price-driven. In many cases, lowest-price award criteria continue to be applied, limiting the effective consideration of quality, durability, innovation, and lifecycle performance.

Without sufficient harmonisation and clear guidance, there is a risk that well-intended policy objectives translate into divergent national practices, increased administrative burden, and reduced legal certainty for both contracting authorities and suppliers operating across borders.

Sustainability & Environmental Criteria

Our members strongly support the integration of environmental and sustainability considerations into public procurement. From an industry perspective, the key objective is to ensure that sustainability requirements are implemented in a harmonised, technology-neutral, and market-ready manner that enables effective competition and innovation.

Experience at national level demonstrates the importance of consistency and proportionality. In some Member States, mandatory environmental criteria already impose specific technological choices, even where market readiness or supporting infrastructure is not yet sufficient. Such approaches risk distorting competition and limiting effective innovation.

EUnited therefore recommends that the revised framework establish clear EU-level principles for sustainability criteria, ensuring flexibility, technology neutrality, and gradual implementation aligned with market maturity.

Total Cost of Ownership (TCO)

EUnited recognises the value of Total Cost of Ownership as a concept for capturing lifecycle performance, durability, and operating costs. However, our members' experience shows that the practical application of TCO remains challenging in many sectors.

In particular, the absence of harmonised standards and objective benchmarks for energy consumption and performance makes reliable and comparable TCO calculations difficult. This can lead to inconsistent

evaluations, limited comparability between offers, and increased legal uncertainty for both suppliers and contracting authorities.

In such cases, contracting authorities may also face a higher risk of challenges or litigation, which ultimately undermines procurement efficiency. EUnited recommends promoting TCO methodologies where robust and standardised calculation frameworks exist, while allowing alternative evaluation approaches in sectors where such methodologies are not yet sufficiently developed.

By way of illustration, in both the municipal and cleaning equipment sectors, tenders may formally refer to lifecycle or operating costs while lacking objective and standardised benchmarks for energy consumption, durability, or maintenance. In practice, this can result in TCO being applied inconsistently or reverting to simplified price comparisons, despite the long service life and operational complexity of the equipment concerned.

Award Criteria & Innovation

Despite policy objectives encouraging a greater focus on quality-based procurement, lowest-price award criteria remain widespread in practice. This approach limits incentives for investment in innovation, sustainability, and long-term performance, particularly for complex equipment with long operational lifecycles.

For sectors such as municipal equipment, cleaning machines, and vehicle wash systems, innovation often relates to durability, efficiency, digitalisation, and reduced environmental impact over time. These aspects are not always adequately reflected in current award criteria.

EUnited therefore encourages the revised framework to further discourage purely price-based awards and to strengthen the role of qualitative, performance-based, and innovation-related criteria, while maintaining transparency and proportionality for contracting authorities.

Digital Procurement & Transparency

Digital procurement tools have significantly improved accessibility and efficiency. However, members report persistent shortcomings regarding transparency after tender submission, including limited access to evaluation methodologies, scoring logic, and comparative feedback.

EUnited recommends that the revised framework address not only digitalisation but also transparency and interoperability, ensuring that digital procurement systems support fair competition and accountability across borders.

Improved transparency and interoperability of digital procurement systems would also facilitate cross-border participation and support fair competition within the Single Market.

Cybersecurity and Alignment with EU Digital Legislation

As municipal, cleaning, and vehicle-related equipment increasingly incorporates digital, connected, and software-based components, public procurement requirements are progressively intersecting with horizontal EU digital legislation, including cybersecurity and data-related obligations.

From an industry perspective, it is important that procurement-related digital and cybersecurity requirements are aligned with existing EU legislative frameworks, such as the Cyber Resilience Act and the NIS2 Directive.

Clear alignment would help avoid duplication of obligations, inconsistent requirements across Member States, and unnecessary administrative burden, while ensuring an appropriate and proportionate level of cybersecurity and digital resilience.

EU Harmonisation and Legal Certainty

EUnited members operate across multiple Member States and therefore rely on a predictable and coherent regulatory framework. Fragmented procurement practices and diverging national interpretations increase compliance costs and complexity, particularly for cross-border suppliers.

The revision of the public procurement framework should therefore strengthen harmonisation at EU level and provide clear guidance to contracting authorities, while limiting unnecessary national gold-plating.

Greater harmonisation would enhance legal certainty, facilitate cross-border participation, and contribute to a more effective and competitive Single Market.

Conclusion

EUnited supports the revision of the EU public procurement framework as an opportunity to strengthen sustainability, innovation, and resilience, while maintaining fair competition and workable procurement practices.

A balanced approach combining clear EU-level principles, harmonisation, and sufficient flexibility for contracting authorities will be essential to ensure that procurement delivers long-term value for public authorities and supports investment and innovation in European industry. EUnited remains committed to constructive engagement throughout the legislative process and stands ready to contribute further expertise as the revision progresses.

EUnited is the European association representing manufacturers of municipal equipment, professional cleaning machines and vehicle wash systems. It brings together more than 60 member companies in 16 European countries.

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