

NewERA Report

Climate Action Framework

2025 Implementation Update

September 2025



Gníomhaireacht Bainistíochta an Chisteáin Náisiúnta
National Treasury Management Agency

NewERA

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1 Introduction

- This document sets out an update for the Department of Climate, Energy and the Environment (DCEE) on the implementation of the Climate Action Framework (the 'Framework') by the commercial State sector as at 31 December 2024. NewERA has had an action under each of the annual Climate Action Plans (CAP) since 2023 to report to DCEE on the implementation of the Framework in Q1 and Q3 each year, and from 2025 this reporting has moved to an annual basis.
- The Framework was developed in consultation with the 26 commercial State bodies (CSBs) listed opposite. It reflects the exemplar role CSBs are expected to play in decarbonisation, while also recognising their separate nature and commercial mandate in their respective operating environments.
- The Framework was approved by Government in July 2022. All 26 CSBs have confirmed adoption of the Framework and are included in this report.
- To capture the implementation status of the Framework, an online form was distributed to the CSBs in Quarter 2 2025. The form was completed by each of the 26 CSBs. This update is based on the information provided by the CSBs, and also on data published by the Sustainable Energy Authority of Ireland (SEAI). NewERA has not audited, tested or verified the accuracy or completeness of such information.
- Section 2 of this report sets out a summary of the implementation status of the five commitments contained within the Framework.
- Sections 3 to 6 set out further information in relation to various commitments, as follows:
 - Section 3: climate action objectives of the CSBs (Commitment 1);
 - Section 4: the most recent available data published by the SEAI on the CSBs' emissions and progress towards their 2030 targets (Commitment 2);
 - Section 5: circular economy and Green Public Procurement (Commitment 4); and

- Section 6: climate related financial disclosures, including consideration of the implications for the CSBs of the EU Commission's Omnibus Proposals relating to the Corporate Sustainability Reporting Directive (Commitment 5).



2 Framework Implementation Summary

Commitment 1 Governance of Climate Action Objectives

- All 26 CSBs have climate action objectives in place that have been approved at Board level.
- All 26 CSBs have targets in relation to GHG emissions and energy efficiency, and more than half of the CSBs have targets in relation to waste reduction, biodiversity and/or sustainable procurement.
- As regards climate adaptation, ten CSBs have incorporated adaptation into their climate action objectives. Four CSBs have a Board approved adaptation plan in place and a further eight CSBs are currently preparing an adaptation plan. Exposure to climate hazards is being assessed by 19 CSBs and vulnerability to climate hazards has been identified by 18 CSBs.

Commitment 2 Emissions Measurement & Reduction Target

- All 26 CSBs are reporting to SEAI via the M&R system and 25 CSBs have agreed target calculations with SEAI for the 51% emissions reduction and 50% energy efficiency 2030 targets set out in the CAP.
- 24 CSBs have, in conjunction with the SEAI, modelled an emissions pathway towards their 2030 targets.

Commitment 3 Emissions Valuation in Investment Appraisal

- 13 CSBs have measured the net change in tonnes of CO2 equivalent GHG emissions associated with an investment.
- Nine CSBs have monetised GHG emission impacts in an investment appraisal using the price of carbon from the Infrastructure Guidelines and a further 11 CSBs plan to do so in the future.

CSB RESPONSES COMMITMENTS 1 - 3	2025	Change vs. last year (Q1 2024)	
Commitment 1 - Governance of climate action objectives			
Climate action objectives approved at Board level	26	-	↔
Climate action objectives incorporated into investment strategy	25	+2	↑
Progress against climate action objectives reported to the Board	24	+1	↑
Intention to disclose progress against climate action objectives	24	+1	↑
Climate risks included in risk management processes	25	-	↔
Climate action objectives relate to adaptation	10	+2	↑
Board approved adaptation plan	4	+3	↑
Commitment 2 - Emissions measurement & reduction target			
SEAI M&R reporting in place	26	+1	↑
2030 targets adopted	25	+1	↑
2030 emissions pathway modelled	24	+3	↑
Processes to monitor progress towards emissions targets	25	+2	↑
Commitment 3 - Emissions valuation in investment appraisal			
Measured GHG impact in investment appraisals	13	+1	↑
Monetised GHG impact in investment appraisals	9	+3	↑
Plans to monetise GHG impact in investment appraisals	11	-	↔
Monetised GHG impact has influenced investment decisions	6	-	↔



Commitment 4 Circular Economy and Green Procurement

- 14 CSBs have developed a circular economy strategy and 25 CSBs have adopted circular economy initiatives, such as waste minimisation and/or enhancing the efficient use of resources.
- 24 CSBs have incorporated green procurement principles into their procurement policies and documentation and 23 CSBs plan to disclose green procurement policies and practices.
- 17 CSBs are tracking the number and value of signed contracts that incorporate green procurement criteria.
- 21 CSBs are aware of the Office of Government Procurement's (OGP) Green Public Procurement (GPP) Criteria search tool and 15 CSBs returned a completed GPP reporting template to NewERA. However only 9 CSBs confirmed they monitor green criteria delivery in contracts awarded.

Commitment 5 Climate-related Disclosures

- 18 CSBs responded that they are in scope under current CSRD regulations. Nine of these companies expect to remain in scope under the European Commission's Omnibus proposals.
 - 10 of these 18 CSBs have now completed their Double Materiality Assessment (DMA) while seven are currently in the process of preparing one. One CSB is awaiting the outcome of the EU Commission Omnibus proposals before progressing with a DMA.
 - Two CSBs have published disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation) and nine further CSBs are preparing these disclosures. One further CSB who is not subject to CSRD reporting obligations by law has completed a DMA and published taxonomy disclosures. This CSB plans to comply with CSRD requirements on a voluntary basis from 2027 onwards.
- Of the eight CSBs that have confirmed they are not in scope under the current CSRD regulations, five CSBs have identified relevant climate-related financial disclosures frameworks of which three have identified the Voluntary reporting standard for SMEs (VSME) as being the most appropriate framework to its activities.

CSB RESPONSES COMMITMENTS 4 - 5		2025	Change vs. last year (Q1 2024)
Commitment 4 - Circular economy and green procurement			
Developed a circular economy strategy	14	-	↔
Adopted circular economy initiatives	25	+2	↑
Green procurement principles incorporated in procurement practices	24	+3	↑
Plans to disclose green procurement policy/practices	23	+1	↑
Tracking contracts with green procurement criteria	17	+6	↑
Aware of the OGP's GPP Criteria Search tool*	21		
Completed the GPP reporting template*	15		
Monitor green criteria delivery in contracts awarded*	9		
Commitment 5 - Climate-related disclosures in financial reporting			
Subject to CSRD reporting obligations	18		
Double materiality assessment complete for CSRD	10		
Published / Preparing to publish Taxonomy disclosures	11		
In scope under the proposed revised thresholds	9		
Not subject to CSRD	8		
Identified relevant climate-related financial disclosures framework	5		

Notes to table:

* indicates a new question introduced in the latest questionnaire.

In Commitment 5, a comparison to previous years has been omitted due to the evolution in the sustainability disclosures landscape during 2025, principally the publication by the EU Commission of its Omnibus Proposals in February 2025.

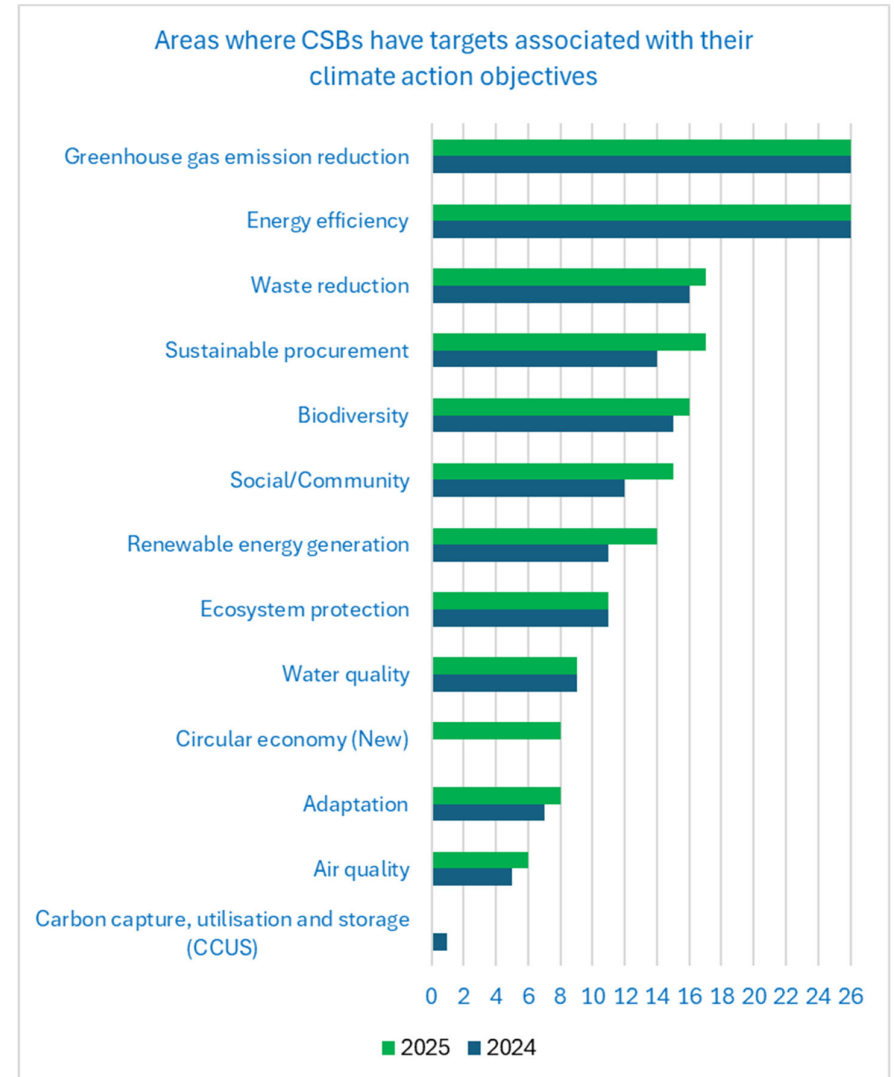


3 Climate Action Objectives of the CSBs

- All 26 CSBs have climate action objectives that have been approved at Board level.
- 25 CSBs have climate action objectives that have been incorporated into their investment strategies, an increase of two since the last update.
- 24 CSBs report progress to their Boards on their climate action objectives and intend to publish disclosure of their progress, an increase of one, in both cases, since the last update.
- Of the 26 CSBs, 23 include all three of the following elements in their approach to the governance of climate action objectives: the objectives are approved at Board level, they are incorporated into their investment strategy and the Board receives progress reports on the objectives.

3.1 Targets associated with climate action objectives

- All 26 CSBs have targets in relation to Greenhouse Gas (GHG) emissions and energy efficiency.
- As shown in the chart, other areas where CSBs have targets associated with their climate action objectives include: waste reduction (17 CSBs, an increase of 1 since 2024), sustainable procurement (17 CSBs, an increase of 3 since 2024), and/or biodiversity (16 CSBs, an increase of 1 since 2024).

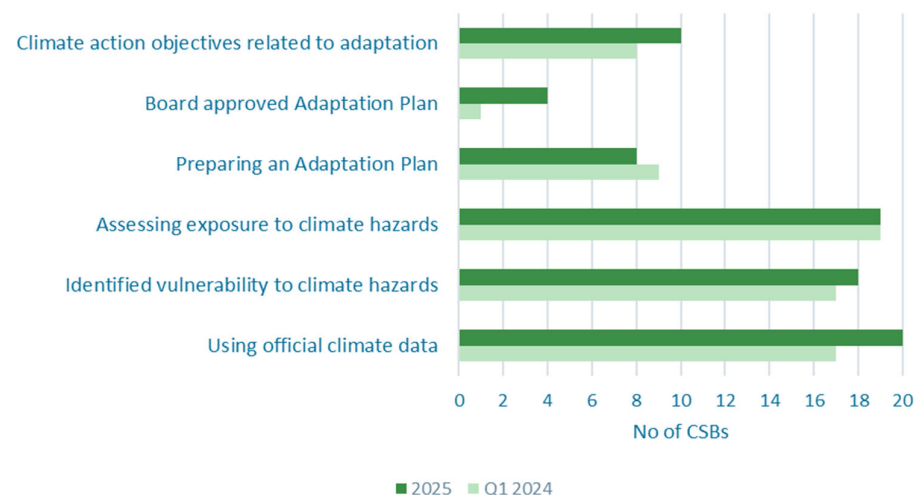


3.2 Climate adaptation

- Adaptation is defined as taking action to prepare for and adjust to both the current and future impacts of climate change.¹
- We note that adaptation is particularly relevant for critical infrastructure providers and for companies with assets in certain physical locations, for example those with coastal vulnerabilities.
- In 2024, when we first asked CSBs about adaptation, we noted that the responses indicated that adaptation is an area that receives less focus than mitigation within the CSBs' approach to climate action objectives. The responses to the 2025 questionnaire indicate a degree of progress in relation to adaptation, as shown below.
- Ten CSBs have climate action objectives related to adaptation (i.e., objectives related to adapting to the impacts or anticipated impacts of climate-related physical risks). This represents an increase from Q1 2024 when eight CSBs reported having climate action objectives related to adaptation. Examples of adaptation objectives in these CSBs include:
 - Improved operation and asset resilience;*
 - Adopt risk modelling and vulnerability assessment tools to assess climate risks;*
 - Collaborate with stakeholders, government departments and local authorities to plan for adaptation to coastal erosion and climate related weather conditions;*
 - Nature based approach to adaptation risks including flooding & overheating*

¹ Preparing for Ireland's Climate Change - Annual review 2024, Climate Change Advisory Council.

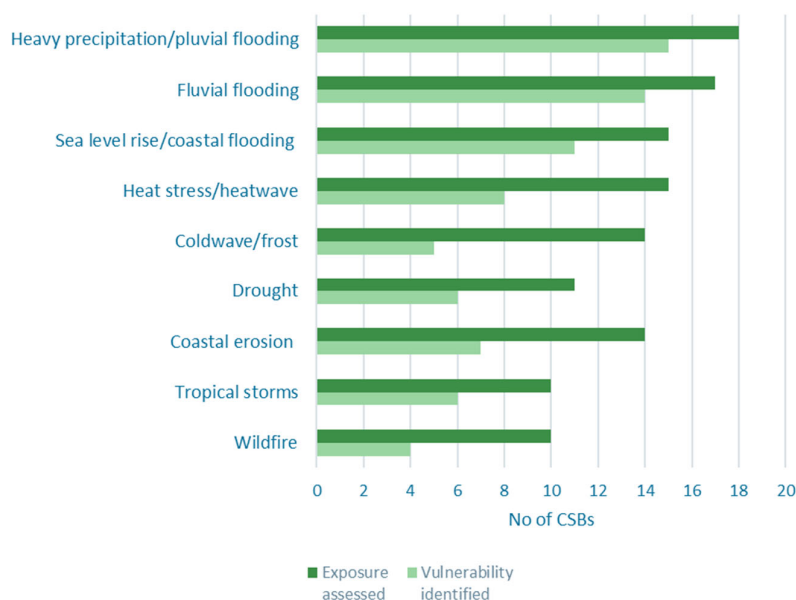
Snapshot of CSB adaptation measures



- Four CSBs have an adaptation plan that has been approved by their Boards. This represents an increase from Q1 2024 when just one CSB reported having a Board-approved adaptation plan. Eight other CSBs are currently preparing an adaptation plan.
- 19 CSBs have assessed their exposure to climate hazards such as heat stress, flooding, drought and storms. This is in line with Q1 2024 when the same number of CSBs reported having carried out such assessments. Of these 19 CSBs, 18 have identified specific vulnerabilities to one or more of these climate hazards.
- Flooding is the most common climate hazard being assessed by the CSBs, as shown in the chart below. For example, exposure to heavy precipitation/pluvial flooding is being assessed by 18 CSBs, and 15 of these have identified a vulnerability to flooding.

- The number of CSBs using climate data from official sources in 2025 was 20, an increase of 3 compared to 2024.
- There continues to be a small number of CSBs (six, unchanged from Q1 2024) that have not assessed their exposure to climate hazards, have not identified any vulnerabilities and are not currently using any climate data from official sources.

Climate Hazard assessments by CSBs



- Three CSBs in the energy and transport sectors have reported that they are engaging with Government Departments in the development of a Climate Action Sectoral Adaptation Plan and that this will inform the development of the individual CSBs' climate action objectives. Under the second National

Adaptation Framework, Sectoral Adaptation Plans are expected to be finalised by the end of September 2025.

- Overall, the responses from the CSBs continue to indicate that adaptation is an area that receives less focus than mitigation within the CSBs' approach to climate action objectives. This may reflect the fact that adaptation as an objective does not lend itself to universal targets like the policy targets set in relation to mitigation efforts. However, we have seen some progress over the last year with an increase in the number of CSBs that have prepared or are preparing an adaptation plan, and greater awareness amongst CSBs of the importance of ensuring resilience of assets and operations. We expect this awareness to continue to grow, as a number of CSBs have noted that the impact of Storm Éowyn in January 2025 has led to a revisiting of investment plans in respect of climate adaptation and asset resilience.

Related publications

- In June 2025 the Environmental Protection Agency (EPA) published the National Climate Change Risk Assessment² (NCCRA) providing a comprehensive assessment of where, when and how climate risks are likely to impact Ireland over the coming decades. The NCCRA provides government, business, communities and other stakeholders with evidence and analysis to inform climate adaptation and resilience in Ireland. The risk assessment will support the development of Sectoral Adaptation Plans by Government Departments, guide the development of Local Authority adaptation plans and inform other national level adaptation responses.
- The Climate Change Advisory Council (CCAC) published its Annual Review: Preparing for Ireland's Changing Climate³ in September 2024, highlighting the urgent need for proactive adaptation. The review found that, while sectoral adaptation plans are essential for building resilience in communities, infrastructure and nature, these plans have yet to be properly implemented, evaluated or resourced. The report recommends that Government Departments and agencies should ringfence funding in their annual budgets to support climate resilience measures.

² <https://www.epa.ie/publications/monitoring--assessment/climate-change/national-climate-change-risk-assessment-main-report.php>

³ <https://www.climatecouncil.ie/councilpublications/annualreviewandreport/AR2024-Adaptation-3P.pdf>

- The CCAC identified several gaps relating to adaptation in Ireland including the need for adaptation finance from a broad range of sources, the absence of a national set of adaptation indicators, limited systemic consideration of cross sectoral adaptation issues, the lack of a national climate damage risk register and the need to better integrate adaptation into land use planning.
- In relation to adaptation finance, the report welcomes the creation of the Future Ireland Fund and the Infrastructure, Climate and Nature Fund. It notes, however, that the use of these funds for adaptation should be clearly designated. The CCAC recommends that lead Government Departments and State agencies incorporate adaptation measures into their annual budgets. The report recommends that the Department of Public Expenditure, Infrastructure, Public Service Reform and Digitalisation should ensure that funding is identified and ringfenced through the National Planning Framework and National Development Plan. It also recommends that CSBs and regulators should prioritise and fund projects that strengthen critical transport and energy infrastructure.



4 Emissions Measurement & Reduction Targets

2030 targets

- As set out in the Climate Action Plans, by 2030, every public sector organisation is required to reduce its GHG emissions by an amount that is consistent with achieving the following Government mandated targets:
 - 51% reduction in energy-related GHG emissions
 - 51% reduction in thermal (heating) and transport related GHG emissions
 - 50% improvement in energy efficiency.

SEAI Monitoring & Reporting

- The SEAI collects data from across the public sector each year via the Monitoring & Reporting (M&R) process.⁴
- Within the M&R system, emissions arising from a public body's consumption of electricity are calculated based on:
 - (i) electricity consumption; and
 - (ii) the rate of electricity supply-side decarbonisation – this is outside the control of individual public bodies.
- For this reason, SEAI has broken down the Government-mandated 2030 emission reduction target into two components:
 - a 51% reduction in CO₂ emissions arising from the consumption of fossil fuels (the 'fossil CO₂ target'), including for heating

(thermal) and transport, compared to the fossil CO₂ level at the organisation's GHG baseline; and

- a total CO₂ target calculated as the organisation's fossil CO₂ target for 2030 plus the organisation's electricity emissions at its baseline less the projected supply-side emissions reduction from electricity by 2030.⁵
- The SEAI states that an organisation will achieve its total CO₂ target if it achieves its fossil CO₂ target and it maintains its consumption of grid electricity at or below its consumption during the baseline period.
- This means that it is critical to the achievement of Government's 2030 emission reduction target that CSBs focus on reducing their thermal and transport emissions, in addition to avoiding or minimising increases in their electricity consumption.

Commitment 2 in the Climate Action Framework

- As noted in the summary table in Section 2, based on the information collected by NewERA from the CSBs, in 2024:
 - All 26 CSBs provided SEAI with all necessary monitoring and reporting data;
 - 25 CSBs have agreed target calculations with SEAI for the 51% emissions reduction and 50% energy efficiency 2030 targets set out in the CAP;
 - 24 CSBs had modelled, in conjunction with the SEAI, one or more viable emissions pathways to meet its 2030 targets and identified the key investments required; and
 - 25 CSBs had measurement and reporting processes in place to monitor progress towards the targets.

⁴ Results for each individual public body for 2023 are available at: <https://www.seai.ie/plan-your-energy-journey/public-sector/monitoring-and-reporting/public-sector-results/public-body-results>

⁵ Based on SEAI forecast data, an assumed reduction arising from the extent to which Ireland's electricity network is anticipated to decarbonise by 2030, and assuming no change in the organisation's consumption of electricity

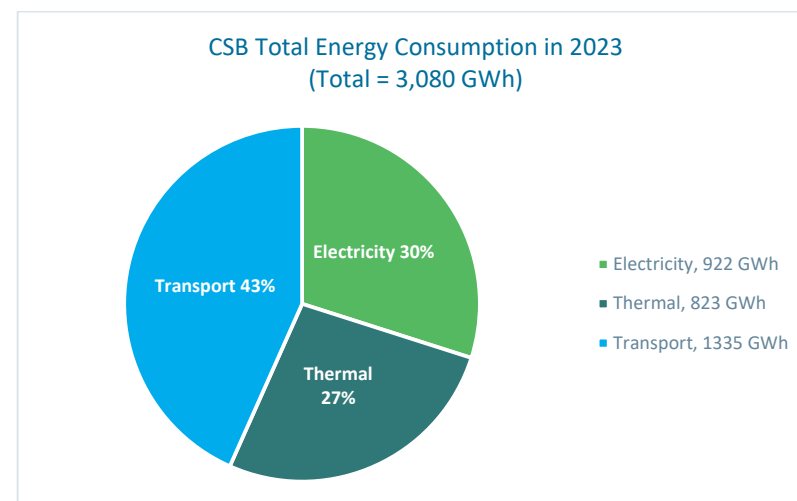
SEAI M&R results for the CSBs in 2023

- The energy targets apply to all public bodies that report under the SEAI Energy Efficiency M&R System. CSBs represent a large portion of the total energy consumption and emissions recorded by SEAI M&R.
- In 2023, the CSBs accounted for:
 - 44% of total public sector energy consumption
 - 40% of total public sector CO₂ emissions
 - 33% of total public sector fossil emissions
- Of the 26 CSBs, 5 of these are particularly significant in terms of energy consumption and emissions – Coillte, Úisce Éireann (Irish Water), and the CIÉ Group (Irish Rail, Bus Éireann, Dublin Bus) – as seen in the charts below.⁶
- The SEAI collects data on the following:
 - Energy consumption (broken down into three categories: electricity, transport and thermal); and
 - CO₂ emissions (broken down into the same three categories). When the transport and thermal CO₂ emissions are combined they are referred to as Fossil emissions.

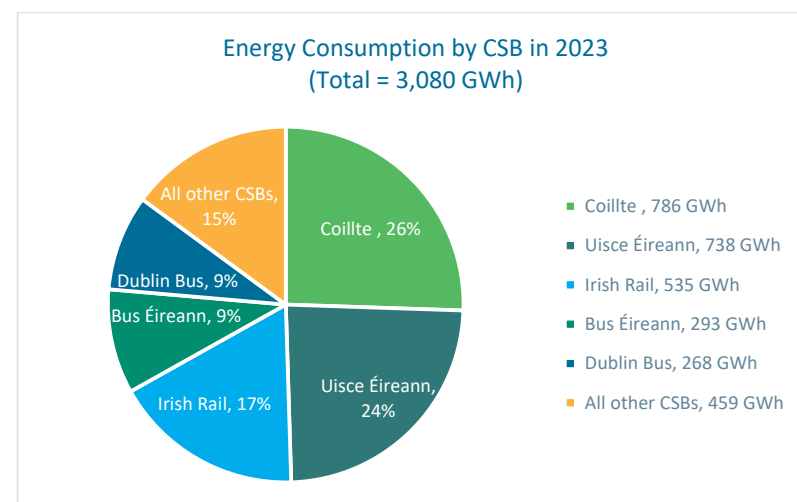
Energy consumption

- In 2023, the total energy consumption of the 26 CSBs recorded in the M&R system was 3,080 GWh.
- Among the CSBs in 2023, 85% of energy consumption was accounted for by Coillte (26%), Uisce Éireann (24%), and the three CIÉ subsidiaries: Irish Rail (17%), Bus Éireann (9%) and Dublin Bus (9%). The other 21 CSBs accounted for the remaining 15% of total energy consumed in 2023 by this cohort.

⁶ Activities relating to energy generation that are accounted for in the EU Emissions Trading Scheme (ETS) are not accounted for within the M&R system. Thus, the data presented here excludes the



Source: NewERA analysis of SEAI data

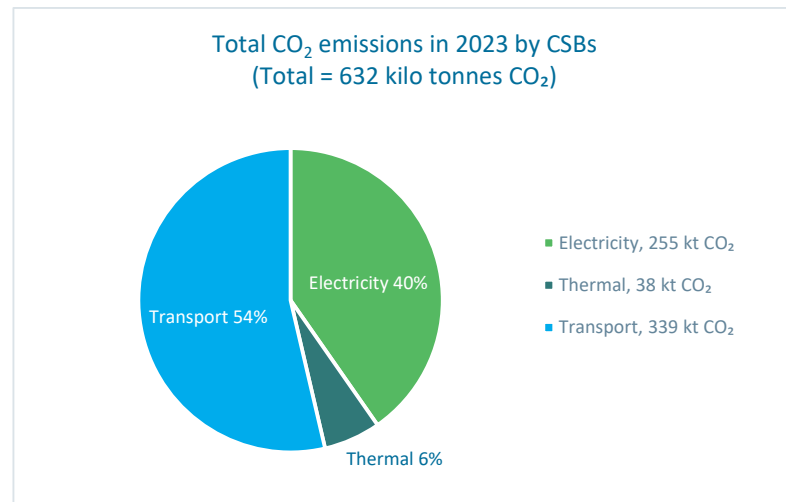


Source: NewERA analysis of SEAI data

energy consumption and emissions associated with ESB's power generation activities and Gas Networks Ireland's gas pumping stations.

CO₂ emissions

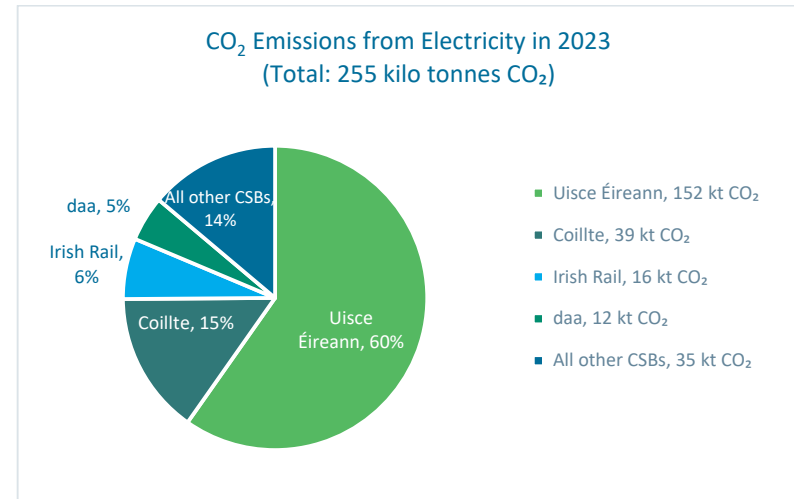
- In 2023, the total CO₂ emissions from the 26 CSBs recorded in the M&R system was 632 kilo tonnes CO₂.
- Electricity accounted for 40% of total CO₂ emissions, with the remaining 60% from fossil fuels (transport and thermal). According to the SEAI, the proportion of thermal in total emissions is significantly lower than its share of total energy consumption because most of the thermal energy consumed was from low carbon sources, for example biomass-fuelled heat production.



Source: NewERA analysis of SEAI data

Electricity emissions

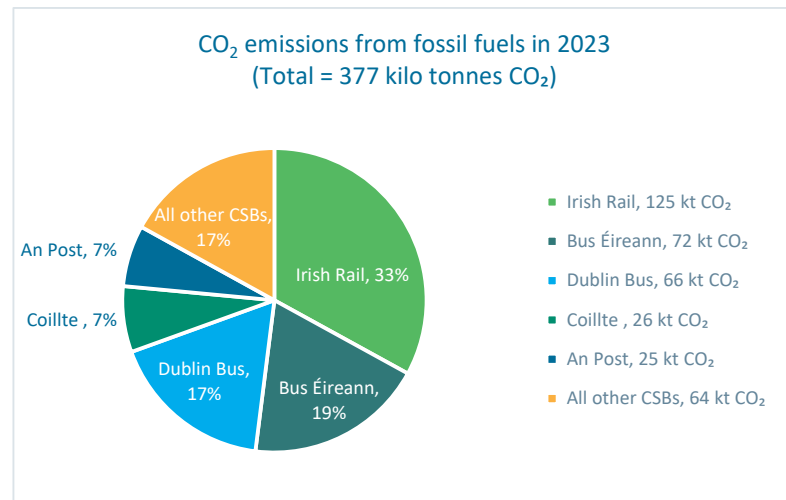
- Uisce Éireann accounted for 60% of total CSB emissions from electricity (as recorded in M&R) in 2023. Coillte accounted for 15%, Irish Rail 6%, daa 5% and the remaining CSBs accounted for 14%.



Source: NewERA analysis of SEAI data

Fossil emissions

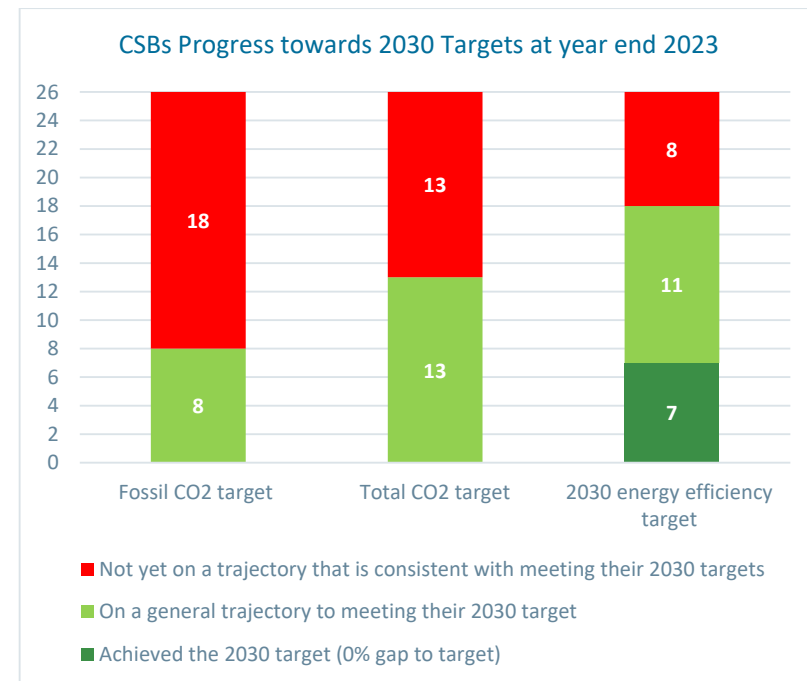
- In 2023, the total fossil emissions from the 26 CSBs was 377 kilo tonnes CO₂ (i.e. 60% of CSBs' total CO₂ emissions).
- The three CIÉ subsidiaries accounted for 69% of total fossil emissions from the 26 CSBs in 2023: Irish Rail (33%), Bus Éireann (19%) and Dublin Bus (17%). Coillte and An Post accounted for 7% each, and the remaining CSBs accounted for 17%.



Source: NewERA analysis of SEAI data

2030 Targets: CSB performance in 2023 (from SEAI's M&R)

- Based on the latest available data from SEAI⁷, the CSBs' performance at the end of 2023 showed the majority of CSBs are on track to meet their 2030 energy efficiency target, however, many CSBs are not yet on a trajectory to meeting their emissions reduction targets, as shown in the chart below.



Source: NewERA analysis of SEAI data.

Note: This chart presents data relating to 25 CSBs plus Cork Airport. The Land Development Agency (LDA) is not included in the chart as they are currently working with SEAI to confirm their baseline. daa reports separately to SEAI in respect of its activities at Cork airport.

⁷ Results for each individual public body for 2023 are available at: <https://www.seai.ie/plan-your-energy-journey/public-sector/monitoring-and-reporting/public-sector-results/public-body-results>

and in the SEAI's Annual Report <https://www.seai.ie/sites/default/files/publications/Public-Sector-Annual-Report-2024.pdf>

- The table opposite shows the performance of each CSB across the three Government targets⁸.
 - The CSBs are listed in descending order based on their total emissions.
 - The % represents the % changes since the baseline. In the case of the energy efficiency target, a negative sign indicates an improvement in energy efficiency.
 - The colours represent the CSBs' trajectory to meet their 2030 targets. Red indicates where the CSB is not yet on a trajectory that is consistent with meeting their 2030 targets and green indicates where the CSB is on a general trajectory to meeting their 2030 target.
- The emissions data for the CSBs published by SEAI may not align with emissions data published by individual CSBs as there are different approaches that can be used for scope 2 emissions reporting. Location-based reporting calculates emissions based on the average emission intensity of the power grid the organisation is physically connected to. Market-based reporting allows companies to report their emissions based on their specific energy choices and contractual arrangements (e.g. Purchase Power Agreements). SEAI uses location-based reporting for public bodies' electricity emissions. In addition, national greenhouse gas targets do not cover exactly the same scope as the Greenhouse Gas Protocol.

Corporate Power Purchase Agreements

- At present, the SEAI's M&R system does not provide any recognition within the calculation of a public body's electricity emissions of the impact of corporate power purchase agreements (CPPAs), because public bodies' electricity emissions are taken to be the grid average. We understand that this position may be reviewed.

⁸ The percentage reduction required by each public sector organisation to achieve its total emissions target is dependent on the makeup of its energy use at its greenhouse gas baseline. Each organisation's baseline and target calculation is available via the SEAI's M&R system.

2030 Targets: CSB performance in 2023 (from SEAI's M&R)

CSB	Greenhouse Gas Emissions		Energy Performance
	Fossil CO ₂ (% change since baseline)	Total CO ₂ (% change since baseline)	Energy efficiency (% change since baseline)
Úisce Éireann	-10%	-31%	-34%
Iarnród Éireann	2%	-6%	-15%
Bus Éireann	-5%	-6%	-21%
Dublin Bus	-12%	-13%	-22%
Coillte	-13%	-32%	-21%
An Post	2%	-8%	-41%
daa	-14%	-30%	-54%
Electricity Supply Board	-14%	-29%	-56%
Bord na Móna	-27%	-39%	-71%
Raidió Teilifís Éireann	-19%	-47%	-66%
Port of Cork Company	14%	3%	-29%
The Shannon Airport Group	-34%	-45%	-46%
AirNav Ireland	-25%	-35%	-40%
Dublin Port Company	-29%	-39%	-43%
Cork Airport	-37%	-47%	-62%
Port of Waterford Company	31%	9%	-40%
vhi	126%	-2%	-42%
Gas Networks Ireland	-1%	-30%	-47%
Horse Racing Ireland	33%	-14%	-24%
EirGrid Plc	-9%	-41%	-57%
Rásaíocht Con Éireann	-38%	-48%	-35%
Shannon Foynes Port Company	-18%	-25%	-35%
Irish National Stud	-11%	-31%	-40%
TG4	-27%	-48%	-56%
CIÉ	51%	31%	190%
Irish Aviation Authority	-69%	-49%	-29%

Source: SEAI

Notes: As noted by SEAI in its 2024 Annual Report, CIÉ and the LDA submitted sufficient data to calculate results for 2023; however one or more results lie beyond the expected range of probable performance and need verification. The LDA is omitted from the table above as they are currently working with the SEAI to confirm their baseline.

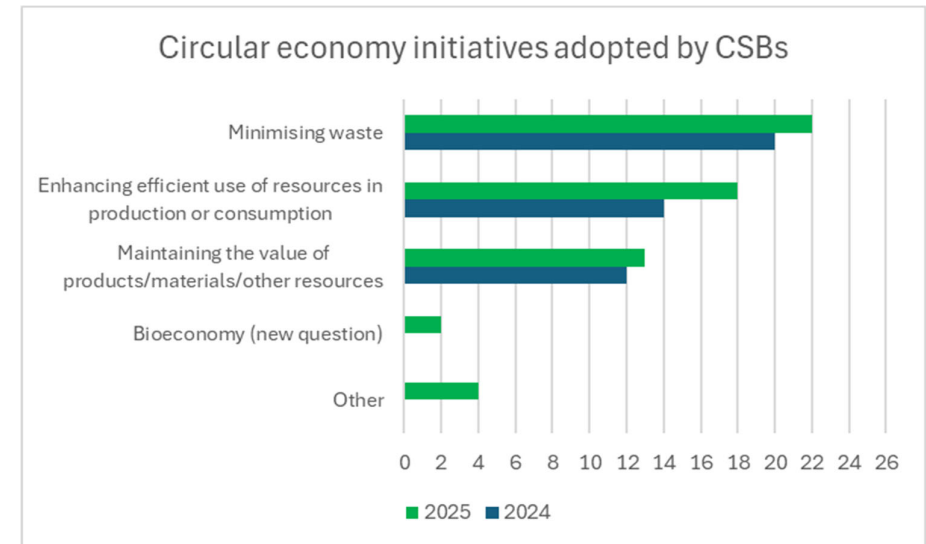


5 Circular Economy & Green Procurement

- The areas of circular economy and green public procurement have seen a number of positive developments by the CSBs over the past year.

Circular Economy

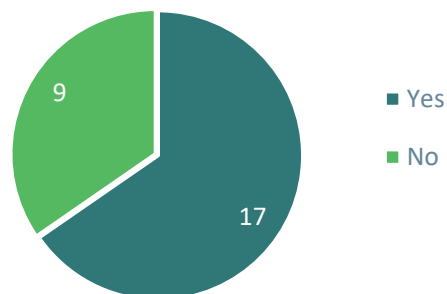
- 25 CSBs have adopted circular economy initiatives (an increase of 2 since 2024). The types of circular economy initiatives that CSBs have adopted include:
 - minimising waste (22 CSBs, an increase of 2 since 2024);
 - enhancing the efficient use of resources in production/consumption (18 CSBs, an increase of 4 since 2024);
 - maintaining the value of products/materials/other resources (13 CSBs, an increase of 1 since 2024);
 - bioeconomy (2 CSBs); and
 - other initiatives such as restrictions on single use items, recycling via scrappage contracts, extending the lives of assets via refurbishment, waste recovery and potable water conservation.
- One CSB noted that some of these circular economy measures started out as initiatives some time ago, but they are now fully engrained in their day-to-day business activities.
- 14 CSBs have developed a circular economy strategy. Other CSBs have indicated that while specific circular economy strategies are not implemented, other activities such as recycling, waste management, sustainable materials and product end-of-life are included in broader plans.



Green Public Procurement

- 24 CSBs have incorporated green procurement principles into their procurement policies and documentation (an increase of one since 2024) and 23 CSBs intend to provide information in their annual report (or another publication) regarding their green procurement policy and/or practices (an increase of one since 2024).
- 17 CSBs track the number and value of signed contracts that incorporate green procurement criteria (an increase of 6 since 2024).

CSBs that track the number and value of contracts with green procurement criteria



- In 2024, CSBs were asked to provide further details regarding GPP implementation, as follows:
 - 21 CSBs are aware of the OGP's GPP Criteria Search tool.
 - 9 CSBs actively monitor the performance of GPP contracts to ensure the delivery of green criteria. Of these nine CSBs, some use contract performance clauses and key performance indicators to monitor performance to green criteria. In one case external certifications were also monitored.

⁹ The quantitative data and analysis provided in this section refers to only the 15 CSBs who completed the GPP Reporting Template.

Green Public Procurement Quantitative Data⁹

- In order to commence the monitoring of GPP by the CSBs and track progress in this area, as envisaged under Action 11 of *Buying Greener: Green Public Procurement Strategy and Action Plan 2024-2027*¹⁰, CSBs were asked to provide qualitative data on the number and value of signed contracts, over a minimum threshold. The EPA's reporting template was used to collect this data from the CSBs. The EPA developed the reporting template to collect GPP data from Government Departments on an annual basis. The EPA have classified 11 'priority sectors' for which they have published national guidance and criteria. These sectors are: Transport, ICT, Food and Catering, Cleaning Products and Services, Office Buildings, Lighting, Heating Equipment, Energy-related Products, Paper and Printing, Furniture and related services, and Textiles.
- 15 out of the 26 CSBs completed the quantitative GPP data reporting template covering the year 2024.
- Of the 11 CSBs that did not complete the reporting template on GPP data, all are currently incorporating GPP/green/sustainability criteria in some/all of their procurement contracts. In some cases they are using elements of the EPA guidance where applicable and appropriate, however the relevant CSBs noted that their overall approach tends to involve bespoke sustainable procurement criteria which is aligned to their own sustainability strategy and sector. Some have set a target percentage of contracts to which green criteria apply.
- The majority of these 11 CSBs noted that they were unable to provide the data requested on their procurement contracts as they do not currently categorise their contracts based on the EPA's priority sectors and/or this is not currently a mandatory requirement.
- Across the 15 reporting CSBs, the total contract value reported for 2024 was €1.4bn across 1,093 contracts. Of this €1.4bn, €340m worth of contracts incorporated GPP criteria, covering 345 contracts. This represents 24% of the total contract value in 2024, and 32% of the contracts. The

¹⁰ <https://assets.gov.ie/static/documents/buying-greener-green-public-procurement-strategy-and-action-plan-2024-2027.pdf>

contracts were subdivided into the 11 priority sectors as identified by the EPA, and other sectors, as detailed below.

Priority sectors

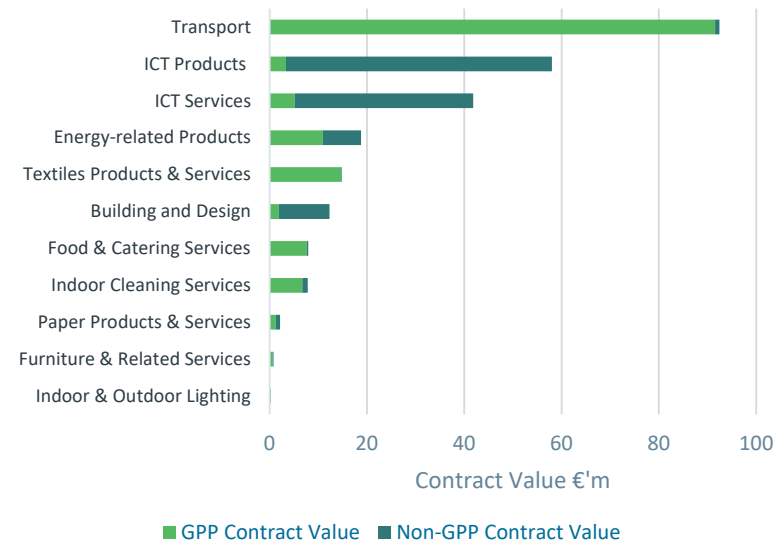
- Across the 11 'Priority' sectors, there were 353 contracts, with a total contract value of €259m across the 15 reporting CSBs in 2024. The contracts in the priority sectors accounted for 18% of the total contract value for these 15 CSBs. Of these contracts, 56% of the total contract value incorporated GPP, and 45% of the total number of contracts signed incorporated GPP.
- GPP implementation rates for 'priority' sectors ranged widely across the 11 sectors. The sectors with the lowest rates of contracts which incorporated GPP criteria were ICT Products and ICT Services – across these two sectors there was €100m spent across 177 contracts, however only 21 contracts incorporated GPP criteria with a value of €7 million. As shown in the chart opposite, the sectors with the highest rates of contracts which incorporated GPP criteria included Transport (across 95 contracts valued at €92 million, 85 of these included GPP criteria) and Textiles products and services (across 5 contracts valued at €15 million, 4 of these included GPP criteria).

Other sectors

- Across the 'other sectors' which do not currently have published national GPP criteria, the total contract value was €1,149m across 740 contracts for the 15 reporting CSBs in 2024. This represents 72% of the total contract value across the 15 CSBs in 2024. Of these contracts, 17% of total contract value incorporated GPP, and 25% of the total number of contracts signed incorporated GPP
- Across the 15 CSBs, professional services was the category with the highest number of contracts and the highest total value of contracts. It accounted for €612m in contracts in 2024, however green criteria were incorporated in only 10% of these contracts representing just 1% of the contract value.
- Civil construction accounted for €266m across 22 contracts in 2024, however none of these contracts incorporated green criteria.

See Appendix B for a detailed breakdown of the GPP data by priority and other sectors.

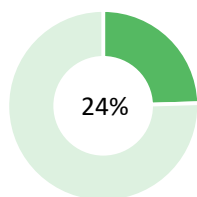
Priority Sectors: Contract Values with and without GPP (2024)



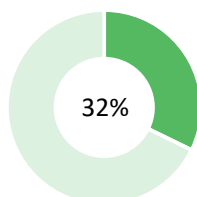
Observations

- 11 CSBs did not complete a GPP data form for 2024 meaning the dataset does not fully reflect the value or number of contracts which have incorporated GPP.
- The findings indicate that there is significant scope to increase GPP implementation by the CSBs.

15 CSBs reported: Total value of €1.4 bn of in-scope contacts, of which €340 million included green criteria.

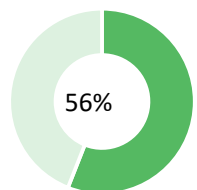


This represents 24% of the total value of contracts reported.

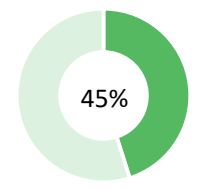


Of the total number of in-scope contracts, 32% were reported to have incorporated GPP.

Priority sectors

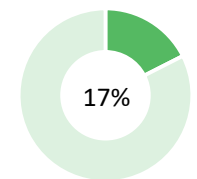


Green criteria were incorporated in 56% of the contract value reported,

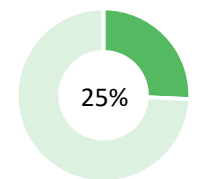


representing 45% of the number of contracts.

Other sectors



Green criteria were incorporated in 17% of the contract value reported,



representing 25% of the number of contracts.

Policy developments

- In June 2024, the Department of Enterprise, Trade and Employment published updated procurement guidance requiring public bodies to reduce embodied carbon in construction, particularly in cement and concrete. From September 2024, low-carbon materials and methods must be specified, with stricter requirements for large-scale projects from 2025, including Whole Life-Cycle GHG assessments.

6 Climate-related Disclosures¹¹

- There has been a considerable degree of evolution in the sustainability disclosures landscape during 2025, principally the publication by the EU Commission of its Omnibus proposals in February 2025.
- Prior to the Omnibus proposals, the majority of CSBs were in scope of the Corporate Sustainability Reporting Directive (CSRD) and had commenced or were well advanced in their preparations.
- This section provides a summary of the CSRD, the proposed changes in the Omnibus proposals and the CSBs' approach to climate related disclosures.
- This section also outlines the approach to climate-related financial disclosures being taken by those CSBs who were not in scope of CSRD as transposed in July 2024.

Corporate Sustainability Reporting Directive

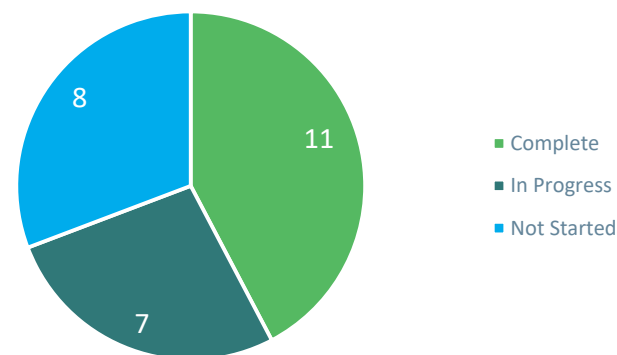
- The CSRD was transposed into Irish law in July 2024 by the EU (Corporate Sustainability Reporting) Regulations 2024 (S.I. No. 336/2024) and SI 498/2024. These regulations provided¹² that mandatory requirements would commence for financial years on or after:
 - 1 January 2024 for any large¹³ Irish incorporated company that is a public interest entity and has greater than 500 employees,
 - 1 January 2025 for any other large Irish incorporated company, and
 - 1 January 2026 for listed SMEs, with an 'opt out' possible until 2028.

¹¹ This section is intended to provide a high-level overview of some of the key provisions of the CSRD and the Omnibus proposals. It is not intended to provide legal advice or legal interpretation of the EU and/or national laws and regulations in this area and the Department should consult with its legal advisers in this regard.

¹² See commentary on following page in relation to the postponement of these reporting requirements pursuant to the "stop the clock" directive and associated Irish regulation.

- 18 CSBs have indicated that they or their subsidiary/ies are in scope under the current regulations, while eight CSBs responded that neither they nor any of their subsidiaries are in scope under the current regulations.
- Undertaking a Double Materiality Assessment (DMA) is an important first step for CSRD. 11 CSBs have now completed their DMA (zero in 2024) including one CSB that is not in scope of CSRD and is preparing to report voluntarily. Seven CSBs are currently in the process of preparing a DMA. Eight CSBs have not started preparing a DMA, including one CSB that is awaiting the outcome of the EU Commission Omnibus proposals before progressing with a DMA.

CSBs Preparing Double Materiality Assessments



¹³ "Large" is defined to mean where any two of the following criteria are met: (a) turnover exceeds €50m; (b) balance sheet total exceeds €25m and the average number of employees exceeds 250. Under the regulations, certain companies are deemed to be "large" irrespective of whether they meet the aforementioned criteria

- Under current regulations, companies that fall under the scope of the CSRD will have to report in their annual reports to what extent their activities are covered by the EU Taxonomy (Taxonomy-eligibility) and comply with the criteria set in the Taxonomy delegated acts (Taxonomy-alignment). Three CSBs have already published EU Taxonomy disclosures¹⁴ (no change versus 2024), and eight CSBs are currently preparing EU Taxonomy disclosures (an increase of one).

EU Commission Omnibus Proposals

- In February 2025, the European Commission released an Omnibus package of proposals aimed at simplifying EU rules, boosting competitiveness, and unlocking additional investment capacity. Among its various measures, the package proposes several key changes to the CSRD, with the goal of reducing the reporting burden and limiting the trickle down of obligations on smaller companies. We set out below some high-level information in relation to some of the key changes proposed as follows:
 - Reduced scope: Mandatory reporting would apply only to large companies with over 1,000 employees and either €50M+ turnover or balance sheet of €25M+. This is expected to reduce the number of reporting companies by c.80%.
 - Fewer datapoints:¹⁵ European Sustainability Reporting Standards (ESRS) to be revised to substantially reduce the number of mandatory disclosable datapoints. The Commission has tasked the European Financial Reporting Advisory Group (EFRAG) with completing this revision by 30 November 2025.
 - Assurance: The abandonment of the potential progression to reasonable assurance (under certain conditions), meaning that CSRD

reports would remain subject to a requirement for limited assurance only.

- Postponement of reporting requirements: A two-year deferral for companies due to report under CSRD in 2026 and 2027. Under the package, companies that were due to report under CSRD in 2026 (for Financial Year 2025) will now report in 2028 (for Financial year 2027). This is known as the “stop-the-clock” directive.
- The Omnibus package also introduces several proposed amendments to the EU Taxonomy as well as to the Corporate Sustainability Due Diligence Directive (CSDDD). Changes include deferring the transposition of CSDDD by Member States by one year, to 26 July 2027, raising applicability thresholds and simplifying reporting requirements.
- The “stop-the-clock” directive postponing the application of CSRD was approved by both the European Parliament and the Council and entered into force in April 2025. Ireland introduced a new statutory instrument transposing the “stop-the-clock” directive into Irish law on 7 July 2025.¹⁶ The additional elements of the Omnibus package involve more substantive amendments and are expected to require extended negotiations.
- The Commission also announced that it will adopt (as a delegated act) a voluntary standard for all companies out of scope, including SMEs, based on the VSME.¹⁷ The VSME, a simplified reporting framework, has gained prominence as a “no regrets” option for those organisations that expect to fall out of scope under the Omnibus proposals. The Commission proposes that VSME would act as a shield, limiting the information that companies that are subject to the CSRD can request from value chain companies with fewer than 1,000 employees and thereby substantially reducing the trickle-down effect. On 30 July 2025, the Commission adopted a recommendation on the VSME standard issued by EFRAG. This recommended VSME standard

¹⁴ [GNI-Directors-Report-and-Financial-Statements-2023](https://www.bordnamona.ie/legal-requirements/ESB%20Annual%20Report%20and%20Financial%20Statements%2023)
[https://www.bordnamona.ie/legal-requirements/ESB Annual Report and Financial Statements 2023](https://www.bordnamona.ie/legal-requirements/ESB%20Annual%20Report%20and%20Financial%20Statements%2023)

¹⁵ As per the proposal for an EC amendment relating to certain corporate sustainability reporting and due diligence requirements: “The CSRD requires undertakings to report sustainability information according to mandatory [ESRS] and requires the Commission to adopt such standards through delegated acts. In July 2023, the Commission adopted a first set of ESRS which are sector

agnostic...the CSRD also requires the Commission to adopt sector-specific reporting standards ...by June 2026. The CSRD allows listed SMEs to report using a separate and lighter, proportionate set of standards instead of the full set of ESRS.”

¹⁶ S.I. No. 309/2025 - European Union (Corporate Sustainability Reporting) Regulations 2025

¹⁷ Voluntary Reporting Standard for SMEs developed by EFRAG at the request of the European Commission.

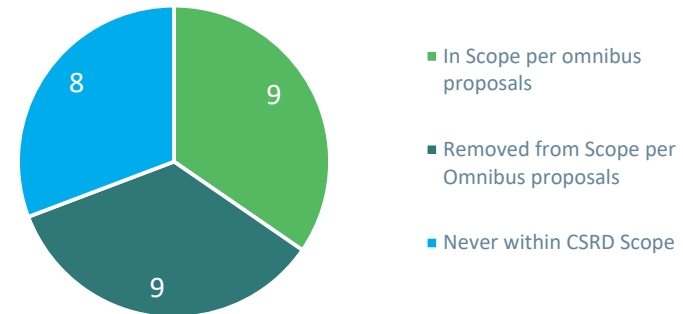


will be used as the basis for the future VSME standard that the Commission proposes to adopt as a delegated act.

CSBs' approach to climate-related disclosures

- Under Commitment 5 of the Framework, CSBs have committed to identifying and achieving compliance with a climate-related financial disclosures framework that is relevant and appropriate to the company's activities and sector(s), by 2024. For many CSBs, reporting under CSRD was the intended approach, in some cases supplemented by reporting under other disclosure frameworks.
- As shown in the chart below, nine CSBs have indicated that they expect to remain in scope under the Omnibus proposals and therefore this will meet their reporting requirements under Commitment 5. These companies were asked if there are any other climate-related frameworks that they currently report under:
 - 3 report under TCFD,
 - 1 reports under GRI.
- Nine CSBs who were expecting to report under CSRD have indicated that they will fall out of scope of the CSRD reporting. Two of these CSBs are considering reporting under CSRD/VSME on a voluntary basis.

CSRD Omnibus Impact on CSBs: Scope Overview



- Eight CSBs have stated that they are not in scope of the current CSRD requirements either due to not meeting the thresholds, or because they are statutory bodies, and so are unaffected by the proposed changes. Of these eight CSBs:
 - Three have identified the VSME as being the most appropriate or relevant framework to report under.
 - One CSB is planning to comply with the requirements of CSRD on a voluntary basis.
 - Four CSBs have yet to identify a relevant framework. It is important that these CSBs identify an appropriate framework in order to meet their obligations under Commitment 5, and NewERA will engage further with these CSBs in this regard.

Appendix A

Important Information

This document (the “Document”) has been prepared by the New Economy and Recovery Authority (“NewERA”) for DCEE for the purpose of providing an update on the implementation of the Framework by the 26 CSBs, as reported to NewERA by the individual CSBs in 2025.

This Document is based on information provided by the CSBs and data published by the SEAI. NewERA has not audited, tested or verified the accuracy or completeness of such information.

This Document is issued by NewERA for information purposes only. The contents of this Document do not constitute investment, legal, business or tax advice and should not be read as such. No understanding, representation or warranty is given as to, and no liability, whether in negligence or otherwise howsoever, is accepted in respect of, the fairness, reasonableness, adequacy, accuracy, completeness, fitness for use or use of the contents of this Document.



Appendix B

GPP by the CSBs: Priority Sectors and Other Sectors (2024)

	Total Contracts	Total Value	Total Contracts w/GPP	Total Value w/GPP
Priority Sectors (Sectors covered by published national GPP criteria)				
Transport	95	€92m	85	€92m
ICT Products	74	€58m	7	€3m
ICT Services	103	€42m	14	€4m
Energy-related Products	28	€19m	25	€11m
Textiles Products & Services	5	€15m	4	€15m
Office Building Design, Construction & Management	16	€12m	7	€2m
Food & Catering Services	7	€8m	4	€8m
Indoor Cleaning Services	7	€8m	5	€7m
Paper Products & Printing Services	10	€2m	4	€1m
Heating Equipment	1	€1m	1	€1m
Furniture & Related Services	5	€1m	3	€1m
Indoor & Outdoor Lighting	2	€0m	1	€0m
Sub-Total	353	€259m	160	€144m
Other Sectors (Sectors not covered by published national GPP criteria)				
Professional Services	176	€612m	18	€7m
Civil Construction	22	€266m	-	-
Other	542	€271m	167	€190m
Sub-Total	740	€1149m	185	€196m
Overall Total	1,093	€1408m	345	€340m

Note: This table includes contracts signed in 2024 with a value over €50,000 across 15 CSBs that completed the GPP reporting template.





Gníomhaireacht Bainistíochta an Chisteáin Náisiúnta
National Treasury Management Agency

NewERA