

NewERA Report

Climate Action Framework

2026 Implementation Update

September 2026



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 2025. NewERA has had an action under each of the annual Climate Action Plans since 2023 to report to DCEE on the implementation of the Framework in Q1 and Q3 each year, and since 2025 this reporting has moved to an annual basis.
- The Framework was developed in consultation with the 26 commercial State bodies (CSBs) listed below. 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 1 2026. 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: 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 an update on the number of CSBs that remain in scope of the Corporate Sustainability Reporting Directive (CSRD) following the implementation of the EU Commission's Omnibus Proposals, and the approach to disclosures being taken by those CSBs that are not in scope (Commitment 5).



2 Summary

Commitment 1 Governance of Climate Action Objectives

- 25 of the 26 CSBs have climate action objectives in place that have been incorporated in their investment strategy. One CSB is planning to incorporate climate targets into its investment strategy in 2026.
- Reporting to the Board on progress towards meeting climate action objectives is established in 25 CSBs, with one CSB in the process of developing reporting metrics. Information on progress against climate action objectives is published by 21 CSBs.
- As regards climate adaptation, 19 CSBs have incorporated adaptation into their climate action objectives. Six CSBs have a Board approved adaptation plan in place and a further 12 CSBs are currently preparing an adaptation plan. 16 CSBs have completed a climate risk and vulnerability assessment.

Commitment 2 Emissions Measurement & Reduction Target

- The CSBs' progress towards their 2030 emission reduction and energy efficiency improvement targets is published annually by the SEAI. All 26 CSBs are reporting to SEAI via the M&R system¹ and the most recent published data for all CSBs relates to the reporting year 2024.
- Although 13 CSBs reduced their fossil emissions in 2024 relative to 2023 levels, in aggregate fossil emissions by the CSBs increased by 0.3% in 2024 compared to 2023. At the end of 2024, seven CSBs were on track to reach their fossil CO₂ emission reduction target for 2030 (a decrease of one from the previous year), while 18 CSBs were not yet on track to reach this target.²
- Total emissions (comprising fossil emissions and electricity emissions) by the 26 CSBs fell by 1% in 2024 compared to 2023, with 17 CSBs reducing their total emissions in 2024 relative to 2023 levels. At the end of 2024, 10 CSBs were on track to reach their total CO₂ emission reduction target for 2030 (a decrease of three from the previous year), while 16 CSBs were not yet on target to reach this target.

¹ Energy performance is reported annually using the SEAI's Monitoring & Reporting (M&R) system.

- At the end of 2024, 17 CSBs were on track to meet their 2030 energy efficiency target (a decrease of one from the previous year), while nine CSBs were not yet on track to meet this target.

CSB RESPONSES COMMITMENTS 1 - 2	2026	Change vs. last year
Commitment 1 - Governance of climate action objectives		
Climate action objectives incorporated into investment strategy	25	0
Progress against climate action objectives reported to the Board	25	1
Published progress against climate action objectives*	21	
Climate risks included in risk management processes	26	1
Climate action objectives relating to adaptation	19	9
Board approved adaptation plan	6	2
Climate risk and vulnerability assessment completed*	16	
Commitment 2 - Emissions measurement & reduction target		
SEAI M&R reporting in place	26	0
On track to meet 51% reduction in fossil CO ₂ emissions by 2030	7	-1
On track to meet 51% reduction in total CO ₂ emissions by 2030	10	-3
On track to meet 50% improvement in energy efficiency by 2030	17	-1
Total number of CSB CAF reports received	26	0

Notes:

* indicates a new question introduced in the latest questionnaire.

Commitment 2: The figures presented for the number of CSBs on track to meet their 2030 targets are based on the most recent data published by the SEAI, which relates to 2024.

² Data is not yet available from the SEAI for 1 CSB.



Commitment 3 Emissions Valuation in Investment Appraisal

- 13 CSBs have measured the net change in tonnes of CO₂ equivalent greenhouse gas (GHG) emissions associated with an investment, while 13 CSBs have not yet undertaken this measurement.
- 15 CSBs plan to monetise GHG emission impacts in investment appraisals using a shadow price of carbon, while 11 CSBs do not yet have plans to monetise these impacts.

Commitment 4 Circular Economy and Green Procurement

- All 26 CSBs have adopted circular economy initiatives which indicates that circular economy is becoming increasingly embedded into how they operate.
- All 26 CSBs have incorporated green public procurement (GPP) principles into their procurement policies and documentation.
- 19 CSBs monitor the delivery of green criteria in contracts awarded.
- 19 CSBs returned a completed GPP reporting template to NewERA and a further three provided aggregate data on their GPP contracts.

Commitment 5 Climate-related Disclosures

- 10 CSBs are planning to make disclosures compliant with CSRD, of which one CSB noted it is planning to report under CSRD on a voluntary basis.
- All 10 CSBs preparing for CSRD reporting have now completed a Double Materiality Assessment (DMA).
- Nine CSBs have either published taxonomy disclosures or are preparing taxonomy disclosures.
- Of the 16 CSBs that have confirmed they are not in scope of CSRD, 15 CSBs have identified the Voluntary Sustainability Reporting Standard for SMEs (VSME³) as being the most appropriate reporting framework and one CSB indicated it was considering its applicability.

³ In the period since the CAF questionnaire responses were received, the VSME has been recast as the 'Voluntary Standard'.

CSB RESPONSES COMMITMENTS 3 - 5	2026	Change vs. last year
Commitment 3 - Emissions valuation in investment appraisals		
Measured GHG impact in investment appraisals	13	0
Plans to monetise GHG impact in investment appraisals	15	4
Monetised GHG impact has influenced investment decisions	5	0 ^Δ
Commitment 4 - Circular economy and green procurement		
Adopted circular economy initiatives	26	1
Green procurement principles incorporated in procurement practices	26	2
Completed the GPP reporting template	19	4
Commitment 5 - Climate-related disclosures in financial reporting		
Subject to CSRD reporting obligations	10	-8
Double materiality assessment complete for CSRD	10	
Published / Preparing to publish Taxonomy disclosures	9	
Not subject to CSRD	16	8
Identified relevant climate-related financial disclosures framework - planning to report under VSME	15	10
Total number of CSB CAF reports received	26	0

Notes:

^Δ Figure for 2025 restated due to a clarification from one CSB regarding its previous response. For Commitment 5, year-on-year comparisons have been omitted for questions relating to CSRD & Taxonomy preparatory activities, as changes in the sustainability reporting landscape during 2025–2026 resulted in changes to the population of CSBs in scope.



3 Governance of Climate Action Objectives

- Under Commitment 1, CSBs commit to integrating climate action within core governance structures, including the establishment of climate action objectives, Board oversight, integration into strategy and investment decisions, and consideration of climate risks. Overall, the 2026 responses indicate that implementation of Commitment 1 remains strong, with close to full adoption of core governance practices in relation to climate action across the sector.
- The continued focus on governance of climate action objectives remains relevant in the current economic and environmental context. Ireland faces legally binding carbon budgets and increasing urgency to accelerate emissions reductions to meet 2030 targets.

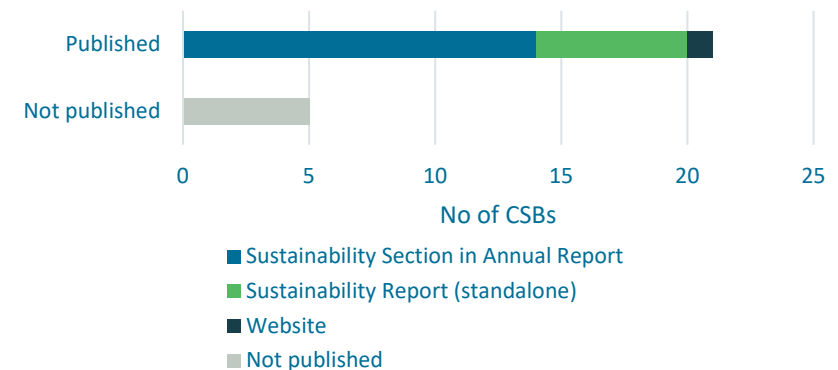
3.1 Climate Action Objectives of the CSBs

- 25 CSBs have climate action objectives that have been incorporated into their investment strategies, in line with what was reported last year. One CSB is planning to incorporate climate targets into its investment strategy in 2026.
- 25 CSBs report progress to their Boards in relation to their climate action objectives, an increase of one CSB. One remaining CSB is developing metrics for Board reporting in line with VSME disclosures.
- 21 CSBs have reported publicly on their progress against their climate action objectives, either in a standalone sustainability report, within their annual financial report or on their website. All 26 CSBs report to the SEAI annually

⁴ One CSB has set an objective but not an associated target, owing to its status as a newly established organisation with an expanding asset base. Nonetheless this CSB reports to the SEAI annually on their emissions and energy efficiency performance as part of the SEAI M&R process.

on their progress towards meeting their 2030 emissions reduction and energy efficiency targets, and this data is published by the SEAI.

Published progress on climate action objectives



- All 26 CSBs include climate risks in their risk management process, an increase of one CSB since last year.

3.2 Targets associated with climate action objectives

- Target-setting is strongest in areas directly linked to national climate targets (GHG emissions and energy efficiency). As shown on the chart on the following page, 25 CSBs have targets in relation to GHG emissions and energy efficiency.⁴
- All 26 CSBs have established an objective in the area of sustainable procurement, with 13 CSBs also setting an associated target. This is the second year in which CSBs have been requested to report the value of contracts incorporating green criteria, in line with the Government's *'Buying*

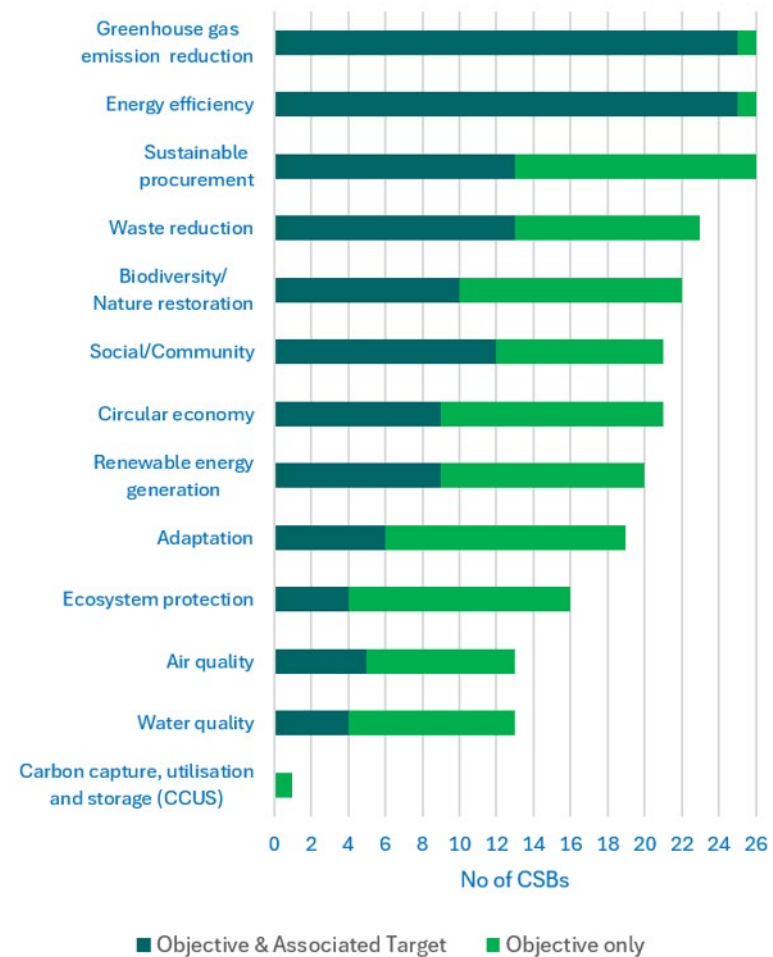
Greener’ strategy. Further detail on the application of green procurement is provided in Section 5 of this report.

- There is a clear distinction between well-established mitigation targets and less-developed targets in broader environmental and resilience-related areas. In areas such as adaptation, biodiversity and circular economy, CSBs are more likely to have objectives without associated quantitative targets.

Objectives related to biodiversity & nature restoration

- 22 CSBs reported having objectives related to biodiversity and nature restoration, of which 10 CSBs had set a target for the related objective.
- In general, CSBs reported a broad range of biodiversity-related objectives. The most common themes centred on biodiversity action planning (six CSBs), including the development and implementation of formal biodiversity strategies and action plans aligned with national policy; and habitat creation and enhancement (seven CSBs), including native planting, rewilding, pollinator initiatives and restoration of ecosystems such as peatlands and intertidal zones.
- Biodiversity net gain and nature-positive targets were identified by four CSBs, while monitoring, assessment and ecological surveys were referenced by five CSBs. Three CSBs highlighted community engagement and partnerships and four CSBs highlighted integration of biodiversity into planning and project design. Overall, responses indicate a maturing approach to this space, with a shift towards measurable outcomes and structured biodiversity programmes.

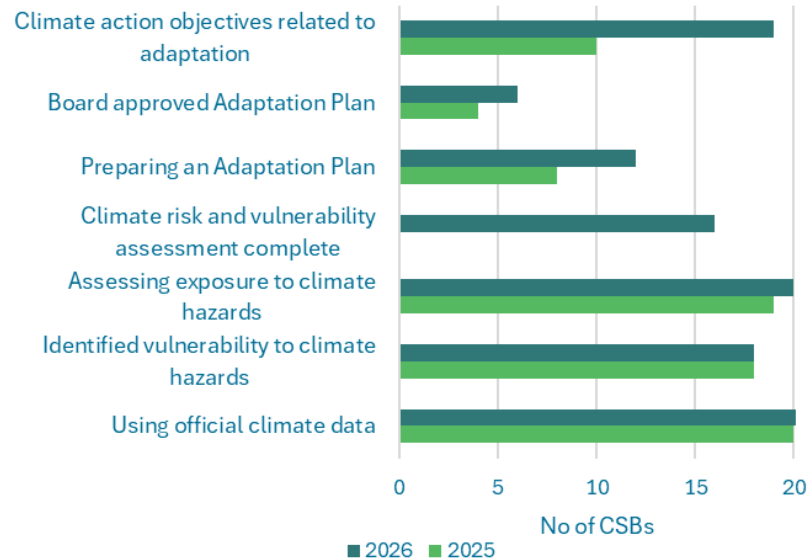
Areas where CSBs have climate action objectives and associated targets



3.3 Climate Risk Management and Adaptation

- Responses received from the CSBs indicate that while climate risk identification is now universal across the sector, more advanced elements of vulnerability assessment and adaptation planning remain areas of ongoing development.
- All 26 CSBs include climate risks within their risk management processes, an increase of one CSB since the 2025 Implementation Update.
- 16 CSBs have completed a climate risk and vulnerability assessment (this was a new question in 2026), while a further four CSBs have informally assessed their climate risks.
- Six CSBs have a Board-approved adaptation plan; two additional CSBs obtained Board approval for adaptation plans in 2025. Of the four CSBs who have Board-approved adaptation plans in place since before 2025, two are currently updating their plans to reflect developments in their climate risk assessments.

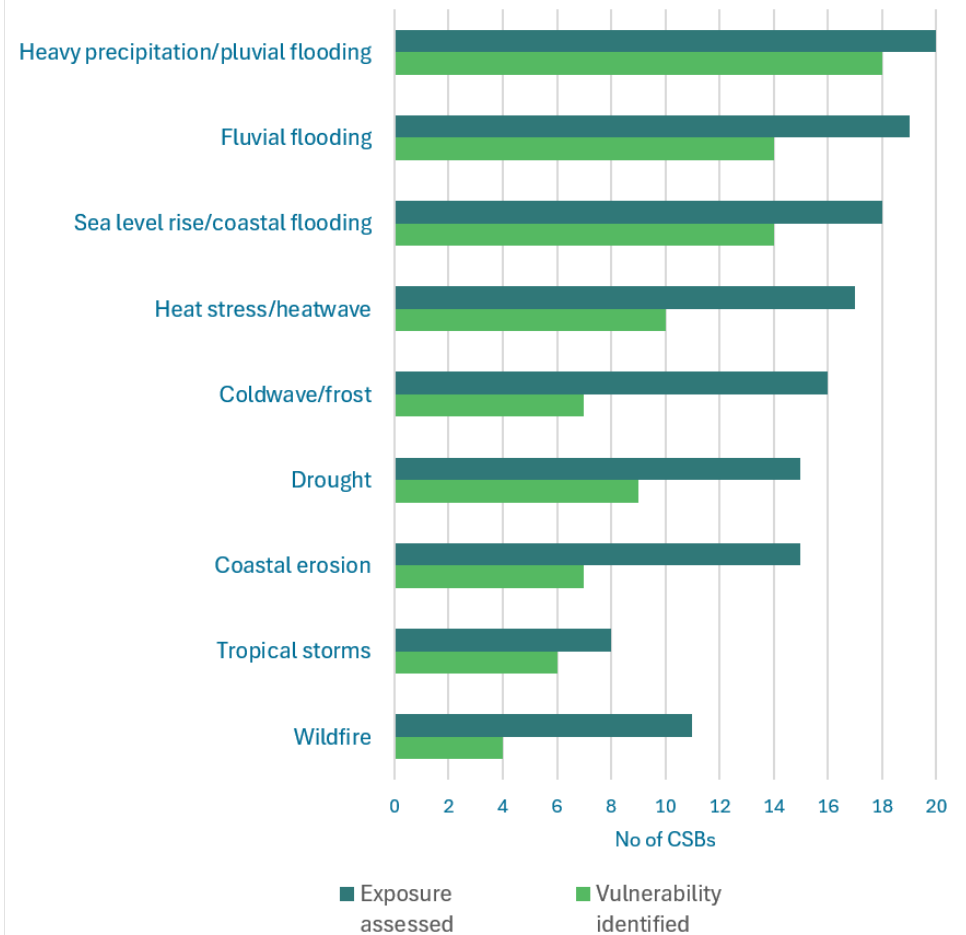
Snapshot of CSB adaptation measures



- The focus on adaptation has strengthened across the sector with 19 CSBs reporting adaptation-related objectives in 2026, compared to 10 CSBs in the previous year. While six CSBs have established associated targets, the majority continue to work towards adaptation objectives without defined targets.
- CSBs reported a range of adaptation-related objectives, primarily focused on enhancing resilience of critical infrastructure, integrating climate considerations into strategic planning, asset management and operational decision-making as well as aligning with national and sectoral adaptation frameworks.
- The responses indicate varying levels of maturity in the development and implementation of climate adaptation across CSBs, which can be broadly grouped as follows:
 - **More advanced (6 CSBs):** These six CSBs have established adaptation objectives supported by Board-approved adaptation plans. Responses demonstrate structured, risk-based approaches, including completed climate risk assessments, defined adaptation measures, integration into governance and investment planning, and ongoing monitoring and reporting.
 - **Developing (10 CSBs):** These 10 CSBs have carried out a climate risk assessment. The majority have set adaptation objectives and are developing their adaptation plans, embedding adaptation within their strategy and asset management processes.
 - **Early stage (6 CSBs):** These six CSBs have identified adaptation as an area for development and are focused on future actions such as preparing adaptation plans, undertaking assessments or aligning with sectoral initiatives. Responses indicate an early stage of development.
 - **Not yet commenced (4 CSBs):** Four CSBs have no immediate plans to undertake a climate risk assessment or to develop an adaptation plan. Of these, two CSBs indicated that this will be a future focus, while the remaining two CSBs identified limited human and financial resources as a key constraint.

- The climate hazards assessed by CSBs remain largely in line with prior years, though assessment findings have been refined by many CSBs reflecting updated methodologies, alignment with international frameworks, and lessons learned from recent events (e.g. severe storms).
- In addition to the list of hazards included in the chart opposite, CSBs also noted extreme weather as a hazard - particularly high winds and storms, changing wind patterns, temperature variability, and water-related risks such as water stress and flooding.

Climate Hazard assessments by CSBs



Related Publications

There have been developments in Ireland's climate adaptation landscape as the focus shifts from risk identification towards structured planning and implementation. The publications outlined below highlight some of the key developments in this area.

- The *National Climate Change Risk Assessment*⁵ was published in June 2025, which established a comprehensive evidence base of climate risks across the economy. This analysis has been operationalised through the development of updated sectoral responses. *Sectoral Adaptation Plans* (SAPs)⁶ covering 13 sectors were published in Q4 2025, setting out sector-specific risks, actions, and governance arrangements across key areas such as agriculture, forestry, seafood, biodiversity, built and archaeological heritage, transport infrastructure, electricity and gas networks, communications networks, flood risk management, water quality, water services infrastructure, health, and tourism. These plans represent a significant step in translating national risk assessment into actionable, sector-level adaptation measures.
- The Environmental Protection Agency's (EPA's) *Focus on Adaptation Report 2025*⁷ highlights continued progress across adaptation governance, planning and risk assessment, supported by improved climate data (including the TRANSLATE programme), enhanced coordination, and increased consideration of adaptation financing.
- In October 2025, the Minister for Climate, Energy and the Environment approved the establishment of the Climate Adaptation Taskforce⁸ to strengthen governance and strategic oversight of climate adaptation. The Taskforce, comprising senior representatives from key Government Departments and agencies, provides a mechanism to address cross-cutting

adaptation challenges, enhance coordination across sectors, and escalate unresolved issues to Government where necessary.

- A joint report by the Climate Change Advisory Council (CCAC) and the Central Bank of Ireland was released in Q4 2025 entitled *Funding Climate Adaptation in Ireland*.⁹ The report notes that current levels of climate adaptation finance being deployed are insufficient to meet the scale of emerging climate risks and emphasises the importance of transition plans to build resilience within the wider economy.
- At a strategic level, the *National Adaptation Framework 2024*¹⁰ continues to underpin these developments, reinforcing a whole-of-Government approach to building climate resilience and responding to increasingly evident climate impacts, including extreme weather events.
- The CCAC's *Annual Review 2025 – Preparing for Ireland's Changing Climate*¹¹ notes that, while substantial progress has been made in strengthening the evidence base and advancing sectoral planning, the key challenge now is effective implementation. The review highlights the need for stronger governance, improved coordination, adequate resourcing and enhanced monitoring to ensure that adaptation actions translate into tangible resilience outcomes.

⁵ <https://www.epa.ie/publications/monitoring--assessment/climate-change/national-climate-change-risk-assessment-main-report.php>

⁶ <https://www.gov.ie/en/department-of-climate-energy-and-the-environment/campaigns/sectoral-adaptation-planning/>

⁷ <https://www.epa.ie/publications/monitoring--assessment/climate-change/epa-focus-on-adaptation-report-2025.php>

⁸ <https://www.gov.ie/en/department-of-climate-energy-and-the-environment/campaigns/climate-adaptation-taskforce/>

⁹ https://www.climatecouncil.ie/councilpublications/otherpublications/Funding%20Climate%20Adaptation%20in%20Ireland_FINAL.pdf

¹⁰ <https://assets.gov.ie/static/documents/national-adaptation-framework-2024-0fa761a3-84e5-4bcf-ac40-0f91f6431ae8.pdf>

¹¹ <https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR2025-Adaptation-final.pdf>



4 Emissions Measurement & Reduction Targets

4.1 Public Sector targets for 2030

- 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 (the '2030 targets'):
 - 51% reduction in energy-related GHG emissions;
 - 51% reduction in thermal (heating) and transport-related GHG emissions; and
 - 50% improvement in energy efficiency.
- These targets apply to all public bodies that report under the SEAI's M&R system.

SEAI Monitoring & Reporting

- The SEAI collects and publishes data from across the public sector each year via the M&R process. 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). Transport and thermal CO₂ emissions combined are referred to as fossil emissions.
- 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 and transport activities, 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 2030.¹²
- 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 the 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. As noted by the SEAI, the fossil CO₂ target is the key emissions reduction target for the public sector.

Commitment 2 in the Climate Action Framework

- Under Commitment 2, the CSBs have committed to adopting the 2030 targets and to modelling an emissions pathway to achieving them. They have also committed to meeting the SEAI's M&R reporting requirements.
- This section sets out an overview of the CSBs' energy consumption and emissions data and their progress towards their 2030 targets, based on the latest data published by the SEAI for each individual CSB, which relates to 2024.¹³

¹² This projected supply-side emissions reduction is an assumed reduction arising from the extent to which Ireland's electricity network is anticipated to decarbonise by 2030, based on SEAI forecast data, and assuming no change in the organisation's consumption of electricity.

¹³ 2024 data for each CSB can be found in the SEAI's Public Sector Annual Report 2025 published in August 2026: <https://www.seai.ie/sites/default/files/publications/Public-Sector-Annual-Report-2025.pdf>

- 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 reporting emissions arising from electricity consumption. 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 bodies to report their emissions based on their specific energy choices and contractual arrangements (e.g. Power Purchase Agreements). SEAI uses location-based reporting for public bodies' electricity emissions. In addition, national GHG targets do not cover exactly the same scope as the Greenhouse Gas Protocol.¹⁴
- 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 energy consumption and emissions associated with ESB's power generation activities and Gas Networks Ireland's gas pumping stations.

4.2 Energy consumption and emissions in 2024

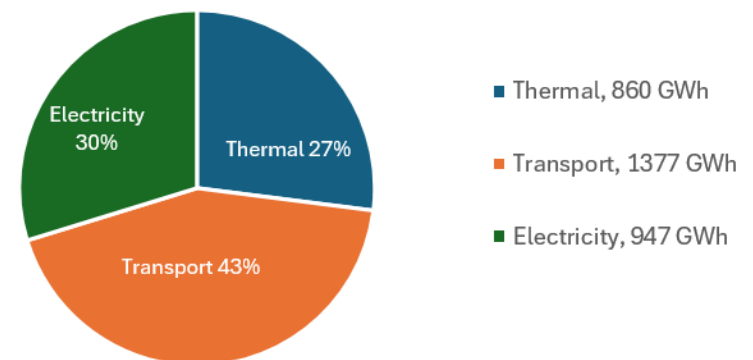
- Data from the SEAI indicates that, in 2024, the CSBs accounted for:
 - 45% of public sector energy consumption (2023: 44%),
 - 41% of public sector fossil CO₂ emissions (2023: 33%), and
 - 40% of public sector total CO₂ emissions (2023: 40%).
- Five of the CSBs are particularly significant in terms of energy consumption and emissions, namely Coillte, Uisce Éireann and the three public transport companies Irish Rail, Bus Éireann and Dublin Bus. Together these five CSBs accounted for over 80% of the total energy consumption and emissions of the CSBs in 2024 (and 2023), as seen in the charts below.

¹⁴ The Greenhouse Gas Protocol is a globally recognised standard for measuring and managing greenhouse gas emissions.

Energy consumption

- In 2024, the total energy consumption of the CSBs recorded in the M&R system was 3,184 GWh (2023: 3,080 GWh). Of the total energy consumption by the CSBs, 43% related to transport, electricity accounted for 30% and thermal accounted for 27% as shown in the chart below.

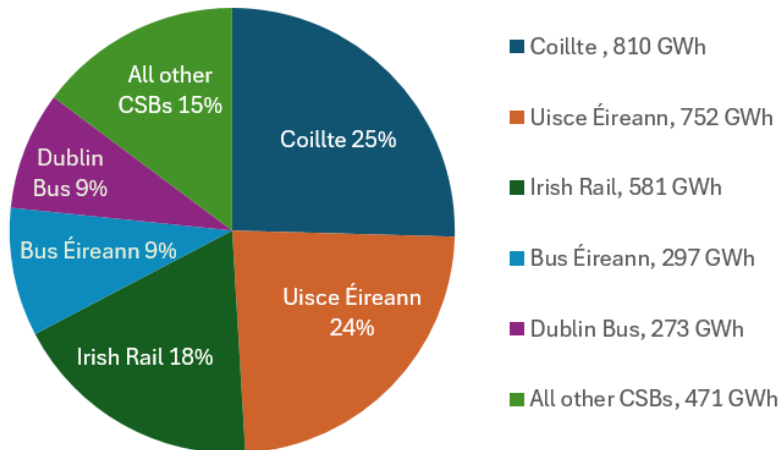
CSB Total Energy Consumption in 2024
(Total = 3,184 GWh)



Source: NewERA analysis of SEAI data

- In 2024, 85% of energy consumption by the CSBs was accounted for by five CSBs - Coillte (25%), Uisce Éireann (24%), Irish Rail (18%), Bus Éireann (9%) and Dublin Bus (9%). The other 21 CSBs accounted for the remaining 15% of total energy consumed in 2024 by this sector.

Energy Consumption by CSB in 2024
(Total = 3,184 GWh)

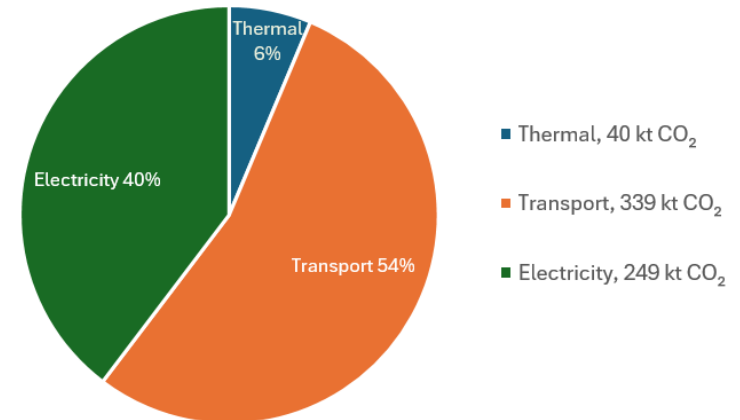


Source: NewERA analysis of SEAI data

CO₂ emissions

- In 2024, the total CO₂ emissions from the CSBs recorded in the M&R system were 627 kilo tonnes CO₂ (2023: 632 kilo tonnes CO₂).
- Electricity accounted for 40% of total CO₂ emissions, with the remaining 60% from fossil fuels (transport 54% and thermal 6%). According to the SEAI, the proportion of thermal in total emissions was 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.

Total CO₂ emissions by CSBs in 2024
(Total = 627 kilo tonnes CO₂)

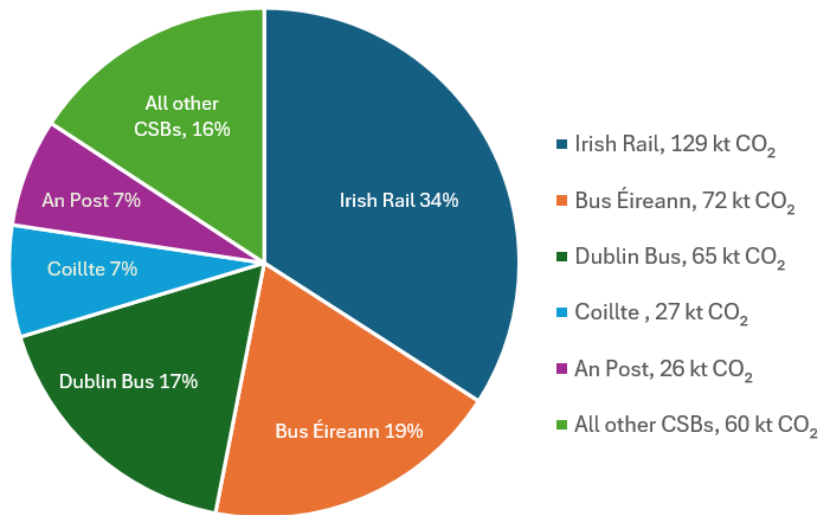


Source: NewERA analysis of SEAI data

Fossil emissions

- In 2024, fossil emissions from the CSBs totalled 378 kilo tonnes CO₂ (2023: 377 kilo tonnes CO₂). This represents 60% of CSBs' total CO₂ emissions.
- The three public transport companies accounted for 70% of total fossil emissions from the CSBs in 2024: Irish Rail (34%), Bus Éireann (19%) and Dublin Bus (17%). Coillte and An Post accounted for 7% each, and the remaining CSBs accounted for 16%.

CO₂ emissions from fossil fuels in 2024
(Total = 378 kilo tonnes CO₂)

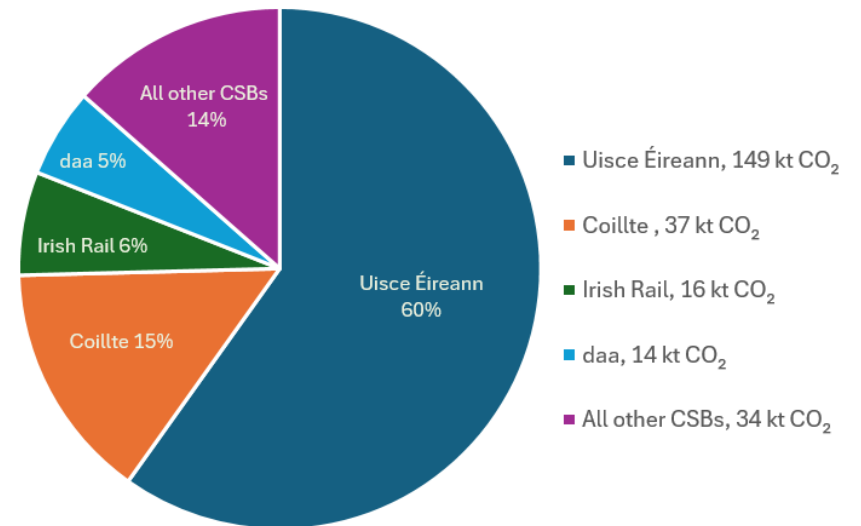


Source: NewERA analysis of SEAI data

Electricity emissions

- In 2024, CO₂ emissions from electricity totalled 249 kilo tonnes CO₂ (2023: 255 kilo tonnes CO₂).
- Uisce Éireann accounted for 60% of total CSB CO₂ emissions from electricity (as recorded in M&R) in 2024. Coillte accounted for 15%, Irish Rail 6%, daa 5% and the remaining CSBs accounted for 14%.

CO₂ emissions from electricity in 2024
(Total = 249 kilo tonnes CO₂)



Source: NewERA analysis of SEAI data

4.3 2030 targets: CSB performance in 2024

Fossil CO₂ emissions target

- In 2024, total fossil emissions by the CSBs were 378,494 tCO₂. This was an increase of 0.3% relative to 2023 (377,434 tCO₂). The table opposite sets out the 2024 fossil CO₂ emissions data for each individual CSB, as published by the SEAI.
- While fossil emissions by the CSBs collectively increased by 0.3%, 13 CSBs reduced their fossil emissions in 2024 relative to 2023 levels with significant reductions achieved by a number of CSBs, e.g., EirGrid (-31%), Port of Waterford (-25%), Port of Cork Company (-22%) and the IAA (-22%). In terms of absolute fossil fuel emissions, the reductions achieved by Uisce Éireann (-2,206 tCO₂), daa (-1,464 tCO₂), Port of Cork (-734 tCO₂), Dublin Bus (-698 tCO₂) and BnM (-631 tCO₂) are also significant.
- However, these reductions were offset by increases across the other 13 CSBs. The most notable increases occurred in some of the CSBs with the largest total emissions: Irish Rail (+4,545 tCO₂, +4%), An Post (1,234 tCO₂, +5%), ESB (+774 tCO₂, +7%), and Coillte (+333 tCO₂, +1%).
- At the end of 2024, there had been an overall 6% reduction in total fossil emissions by the CSBs since the baseline. However, 5 CSBs' fossil emissions have increased since the baseline.
- The SEAI's assessment of the 26 CSBs based on their performance at the end of 2024 was as follows:
 - Seven CSBs¹⁵ were on track to reach their fossil CO₂ emission reduction target for 2030;
 - 18 CSBs were not on track to reach their fossil CO₂ emission reduction target for 2030. All 7 of the largest contributors to fossil fuel emissions are in this group;
 - In the case of one CSB (the LDA), progress towards its 2030 fossil emissions target has not yet been reported by the SEAI.

¹⁵ Taking daa (Dublin Airport) and daa (Cork Airport) as one CSB.

CSB	2024 Fossil emissions tCO ₂	% change 2024 vs 2023	% change vs Baseline	On track for fossil CO ₂ target
Irish Rail	129,110	+4%	+6%	No
Bus Éireann	71,753	+0%	-5%	No
Dublin Bus	65,290	-1%	-13%	No
Coillte	26,784	+1%	-12%	No
An Post	25,908	+5%	+7%	No
Uisce Éireann	17,088	-11%	-20%	No
ESB	12,456	+7%	-8%	No
BnM	10,185	-6%	-32%	Yes
daa (Dublin Airport)	6,577	-18%	-30%	Yes
Port of Cork Company	2,672	-22%	-11%	No
RTÉ	1,784	+9%	-11%	No
Dublin Port Company	1,597	-9%	-35%	Yes
The Shannon Airport Group	1,592	+17%	-23%	No
Port of Waterford Company	1,132	-25%	-2%	No
Gas Networks Ireland	907	+2%	+2%	No
AirNav Ireland	710	+3%	-23%	No
Horse Racing Ireland	672	-7%	+24%	No
daa (Cork Airport)	567	+12%	-30%	Yes
Shannon Foynes Port Company	446	+16%	-5%	No
Vhi	410	-19%	-26%	Yes
Greyhound Racing Ireland	252	-1%	-38%	Yes
Irish National Stud	238	+7%	-5%	No
CIÉ Holding Company	134	-11%	+18%	No
EirGrid	103	-31%	-37%	Yes
TG4	94	+37%	+0%	No
LDA	26	+99%	++	No
Irish Aviation Authority	6	-22%	-76%	Yes
	378,494	+0.3%	-6%	

Source: NewERA analysis of SEAI data.

Notes:

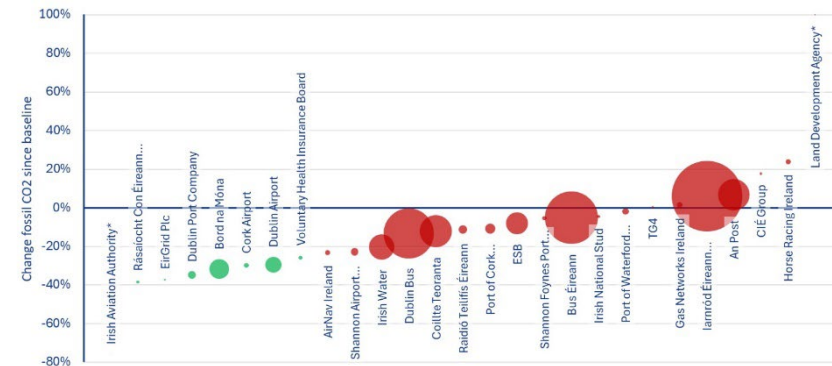
- The CSBs are presented in descending order based on their fossil CO₂ emissions in 2024.

- daa reports to SEAI in respect of its activities at Dublin Airport and Cork Airport separately.

++ Data not published by the SEAI.

- The chart opposite (produced by SEAI) shows the progress of each CSB towards the fossil CO₂ target, based on 2024 data.
- The size of the bubble indicates the relative amount of fossil CO₂ emitted by that organisation.
- The location of the bubble indicates the progress to date - the CSBs below the 0% line have reduced their fossil CO₂ emissions relative to their baseline while those above this line have increased their fossil CO₂ emissions relative to their baseline.
- A green bubble indicates a CSB is on track to reach the 2030 target, and a red bubble indicates a CSB is not on track to reach the target.

Progress towards fossil CO₂ emissions target



Source: SEAI, final M&R performance data for 2024, reproduced here with permission.

Notes:

- CIÉ Group refers to the CIÉ Holding Company.

- daa reports to SEAI in respect of its activities at Dublin Airport and Cork Airport separately.

* Indicates the data is subject to further verification by SEAI.

Total CO₂ emissions target

- Total CO₂ emissions by the CSBs in 2024 were 1% lower than in 2023 (falling from 632,210 tCO₂ to 627,358 tCO₂).
- Uisce Éireann accounted for 26% of total emissions by the CSBs, and the three public transport companies (Dublin Bus, Bus Éireann and Irish Rail) accounted for a further 46%.
- 17 CSBs reduced their total emissions in 2024 relative to 2023 levels with significant reductions achieved by a number of CSBs e.g., Port of Waterford (-18%), Port of Cork Company (-18%) and the IAA (-15%). In terms of absolute tCO₂ emissions, the reductions achieved by Uisce Éireann (-5,499 tCO₂), daa (-1,723 tCO₂), Coillte (-1,541 tCO₂) and BnM (-1,061 tCO₂) are also significant.
- However, these reductions were offset by increases across nine CSBs. The most notable increases in terms of absolute tCO₂ emissions occurred in Irish Rail (+4,037 tCO₂, +3%) and An Post (1,174 tCO₂, +4%).
- At the end of 2024, there had been a 22% reduction in total CO₂ emissions by the CSBs relative to the baseline and 25 of the 26 CSBs had reduced their total emissions relative to the baseline.
- The SEAI's assessment of the 26 CSBs based on their performance at the end of 2024 was as follows:
 - 10 CSBs¹⁶ were on track for meeting their total CO₂ emission reduction target for 2030;
 - 16 CSBs were not on track for meeting this target, as shown in the table opposite, including the six CSBs with the largest levels of total CO₂ emissions.

¹⁶ Taking daa (Dublin Airport) and daa (Cork Airport) as one CSB.

CSB	2024 Total emissions tCO ₂	% change 2024 vs 2023	% change vs Baseline	On track for total CO ₂ target
Uisce Éireann	166,048	-3%	-33%	No
Irish Rail	145,075	+3%	-3%	No
Bus Éireann	73,485	+1%	-6%	No
Dublin Bus	67,770	+1%	-12%	No
Coillte	63,445	-2%	-34%	No
An Post	30,686	+4%	-4%	No
daa (Dublin Airport)	18,570	-8%	-36%	Yes
ESB	18,399	+5%	-26%	No
BnM	11,358	-9%	-44%	Yes
RTÉ	7,603	-4%	-49%	Yes
Port of Cork Company	4,322	-18%	-16%	No
The Shannon Airport Group	3,795	+3%	-43%	Yes
AirNav Ireland	2,989	-7%	-40%	Yes
daa (Cork Airport)	2,239	+1%	-47%	Yes
Dublin Port Company	2,210	-7%	-43%	Yes
Vhi	1,681	-8%	-23%	No
Gas Networks Ireland	1,548	-2%	-31%	No
Port of Waterford Company	1,527	-18%	-10%	No
Horse Racing Ireland	1,255	-5%	-19%	No
Greyhound Racing Ireland	804	-4%	-50%	Yes
EirGrid	768	-12%	-48%	Yes
Shannon Foynes Port Company	599	+8%	-19%	No
Irish National Stud	366	+5%	-28%	No
TG4	293	-4%	-50%	Yes
CIÉ Holding Company	211	-9%	-9%	No
LDA	202	+707%	+156%	No
Irish Aviation Authority	107	-15%	-57%	Yes
	627,358	-1%	-22%	

Source: NewERA analysis of SEAI data.

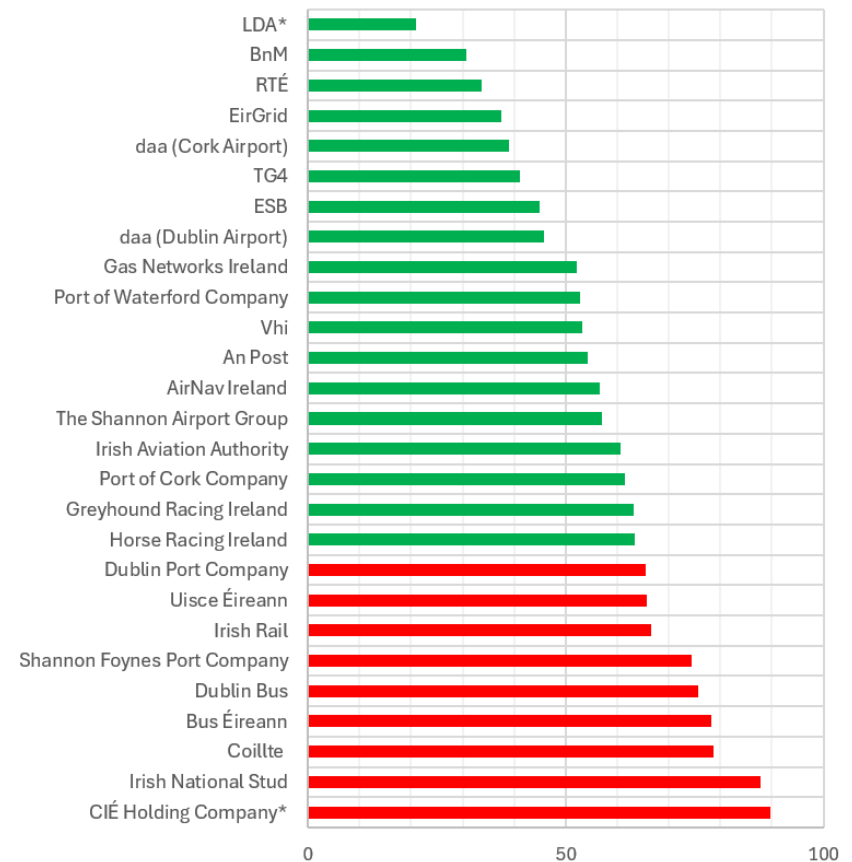
Notes:

- The CSBs are presented in descending order based on their total CO₂ emissions in 2024.
- daa reports to SEAI in respect of its activities at Dublin Airport and Cork Airport separately.
- The LDA was established in 2019, after the baseline period 2016-2018. We understand from the LDA that its total energy use will increase year on year relative to its development and asset management activities. While the small proportion of legacy fossil fuel emissions will be reduced through various efficiency and technology upgrade measures, the majority of emissions reductions will result from the implementation of the LDA's net zero ready approach and decarbonisation of the national grid.

Energy efficiency target

- At the end of 2024, energy performance had improved relative to the baseline in all of the CSBs, by varying degrees.
- The chart opposite illustrates the status of each of the CSBs at the end of 2024 on their energy performance indicators. The target for each CSB is to achieve a 50% reduction by 2030 relative to the baseline.¹⁷ **Green** indicates that the target has already been achieved or that energy performance is on a general trajectory consistent with achieving the target. **Red** indicates that energy performance is not yet on a trajectory that is consistent with meeting the target.
- The SEAI's assessment of the 26 CSBs based on their performance at the end of 2024 was as follows:
 - 17 CSBs¹⁸ were on track to meet their 2030 energy efficiency targets if their energy performance is maintained at their 2024 levels over the period 2025-2030 (marked in **green** in the chart opposite).
 - Nine CSBs were not yet on track to meet their 2030 energy efficiency target (marked in **red** in the chart opposite). To achieve the efficiency target these CSBs will need to improve their energy performance over the period 2025-2030. Some of these CSBs were just marginally off the trajectory required to meet this target.

Energy Efficiency Target
Energy performance indicator (2024)



Source: SEAI, NewERA analysis

Notes:

daa reports to SEAI in respect of its activities at Dublin Airport and Cork Airport separately.

*The target energy performance indicator for each CSB is 50 with two exceptions – LDA (74) and CIÉ Holding Company (67). Source: SEAI.

¹⁷ The target energy performance indicator for each CSB is 50 with two exceptions – the Land Development Agency (74) and CIE Holding Company (67) as both were configured on M&R with

later baselines for the energy efficiency target and their 2030 targets were adjusted on a pro rata basis. Source: SEAI.

¹⁸ Taking daa (Dublin Airport) and daa (Cork Airport) as one CSB.

5 Circular Economy & Green Procurement

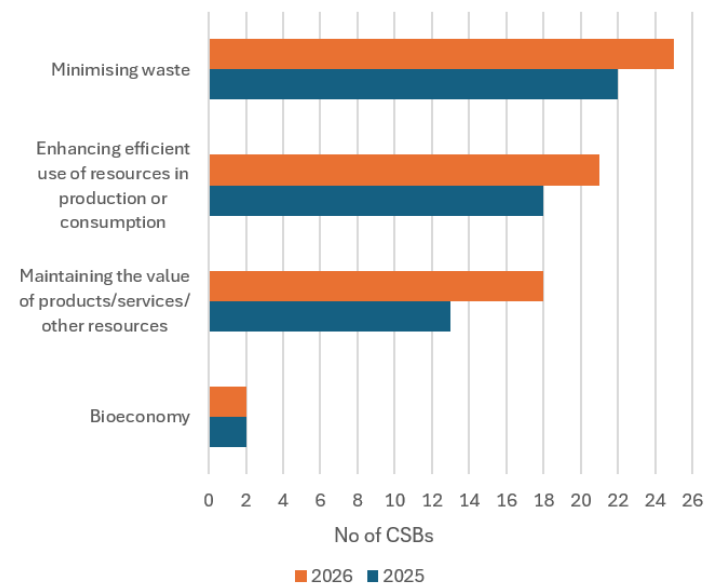
- The areas of circular economy and green public procurement have seen a number of positive developments in the CSB sector in 2025.

5.1 Circular Economy

- All 26 CSBs have adopted circular economy initiatives (an increase of one since the 2025 Implementation Update) which indicates that a circular economy approach is becoming increasingly embedded into how the CSBs operate. The types of circular economy initiatives that CSBs have adopted include:
 - minimising waste (25 CSBs, +3);
 - enhancing the efficient use of resources in production/consumption (21 CSBs, +3);
 - maintaining the value of products/materials/other resources (18 CSBs, +5);
 - bioeconomy (two CSBs, unchanged); and
 - other initiatives such as recycling end-of-life equipment, extensive preventative maintenance programmes which maintain and extend functional asset lifetimes, as well as specific asset life extension projects where appropriate; and reusing building materials in planned retrofit.
- In many cases these circular economy initiatives are embedded in the CSBs' policies and practices. Eight CSBs have developed a standalone circular economy strategy with two further CSBs close to finalising a circular economy strategy. The development of a circular economy strategy with

clear priorities and targets for resource use is a welcome next step to help ensure that the approach to circular economy is organisation-wide.

Circular economy initiatives adopted by CSBs



Case studies

- A number of CSBs provided case studies illustrating their circular economy initiatives. These case studies demonstrate how CSBs are leading by example and showcase positive environmental impacts across a range of sectors. Please see Appendix C.

Policy developments

- The *Whole of Government Circular Economy Strategy 2026-2028: Accelerating Action*¹⁹ was published in February 2026.

¹⁹ https://assets.gov.ie/static/documents/7484ab1d/Circular-Economy_Strategy-2026-2028-en.pdf

5.2 Green Public Procurement

- All 26 CSBs have incorporated green procurement principles into their procurement policies and documentation, an increase of two CSBs since the 2025 Implementation Update.
- 19 CSBs actively monitor the performance of GPP contracts to ensure the delivery of green criteria (an increase of 10 CSBs), in most cases using contract performance clauses and/or key performance indicators to monitor the performance of green criteria.
- In Government's *Buying Greener: Green Public Procurement Strategy and Action Plan 2024-2027*²⁰, NewERA is tasked with monitoring and reporting progress of GPP implementation by the CSBs (Action 11).

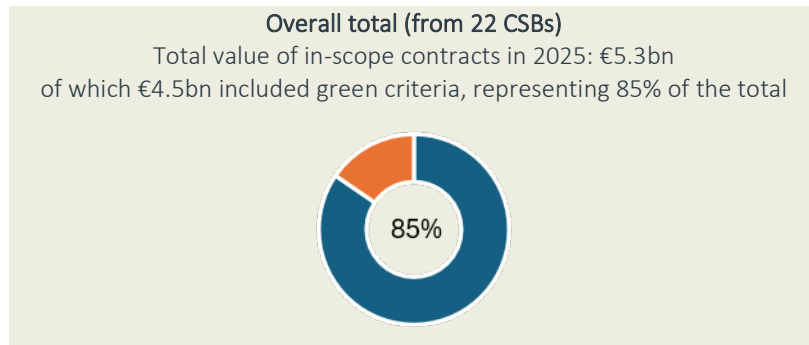


A11 Monitor and report progress of GPP implementation by the Commercial Semi-State sector within the reporting arrangements in place for the Climate Action Framework for that sector.

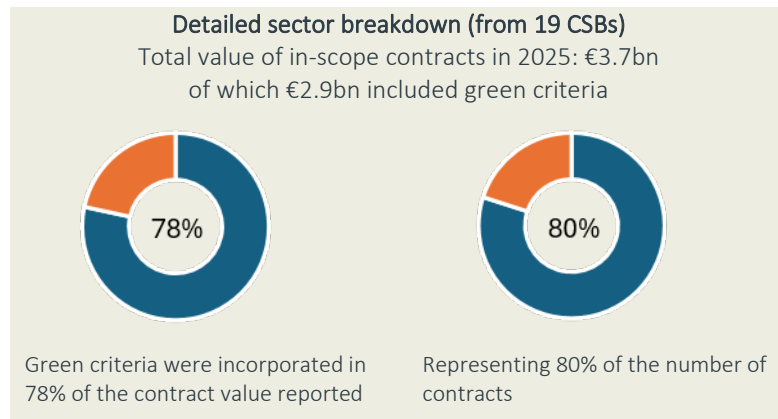
²⁰ <https://assets.gov.ie/static/documents/buying-greener-green-public-procurement-strategy-and-action-plan-2024-2027.pdf>

- As part of the Framework implementation reporting request, CSBs were asked to provide quantitative data on the number and value of signed contracts, over a minimum threshold, that included green criteria. 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 template reflects 11 'priority sectors' for which the EPA has 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. Data is also collected on 'other' sectors outside of these priority sectors.
- 19 of the 26 CSBs completed the quantitative GPP data reporting template covering the year 2025. Three other CSBs advised that they were unable to provide a breakdown of contracts by sector due to the multifaceted nature of their contracts, and provided aggregate spend figures on the total number and value of contracts that included green criteria.
- As such, NewERA can report on overall GPP implementation by 22 of the 26 CSBs, and on GPP implementation by sector across 19 CSBs. This is an increase compared to last year when 15 CSBs provided GPP implementation data. Given the increase in the number of CSBs providing GPP data, comparisons with the previous year's results are only included where relevant.
- All data presented in this section is based on each CSB's own assessment of whether their contracts did/did not include green criteria.
- Four CSBs did not complete the GPP data reporting template or provide information at an aggregate level on their total number and value of contracts that included GPP. Three of these CSBs confirmed that they 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.

- Across the 22 CSBs who provided GPP data, the total contract value reported for 2025 was €5.3bn, of which €4.5bn incorporated GPP criteria. This represents 85% of the total contract value.



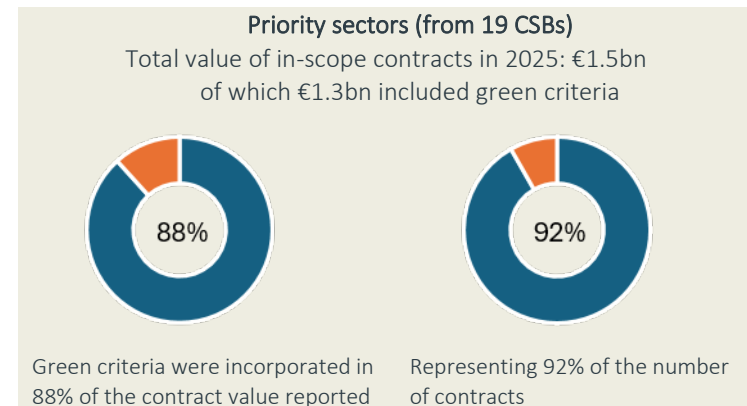
- Across the 19 CSBs who returned the GPP data reporting template, the total contract value reported for 2025 was €3.7bn across just over 3,500 contracts. Of this €3.7bn, €2.9bn incorporated green criteria covering just over 2,800 contracts. This represents 78% of the total contract value in 2025 (2024: 24%), and 80% of the contracts (2024: 32%).



- As noted above, 19 CSBs provided contract data split out by priority sectors and other sectors which is analysed below. Based on the data available, total spend across the priority sectors represents 41% of the total value of contracts by the CSBs and total spend on other/non-priority sectors represents 59% of the total value of contracts by the CSBs.
- See Appendix B for a detailed breakdown by priority and other sectors of the GPP data returned by 19 reporting CSBs.

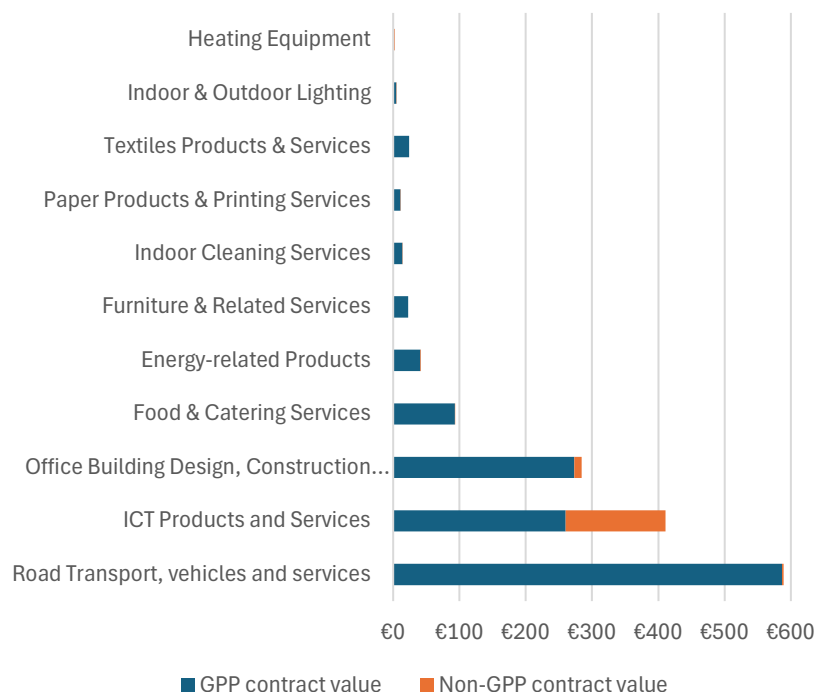
Priority sectors

- Across the 11 'priority' sectors, there were just under 2,500 contracts, with a total contract value of close to €1.5bn across 19 CSBs in 2025. Of these contracts, 88% (2024: 56%) of the total contract value incorporated GPP, and 92% (2024: 45%) of the total number of contracts signed incorporated GPP.



- The sectors which accounted for the highest levels of spend were road transport, vehicles and services (€589m) and ICT products and services (€411m).
- The level of GPP implementation across the priority sectors was very high for nine of the 11 sectors.

Priority Sectors 2025 (€m)

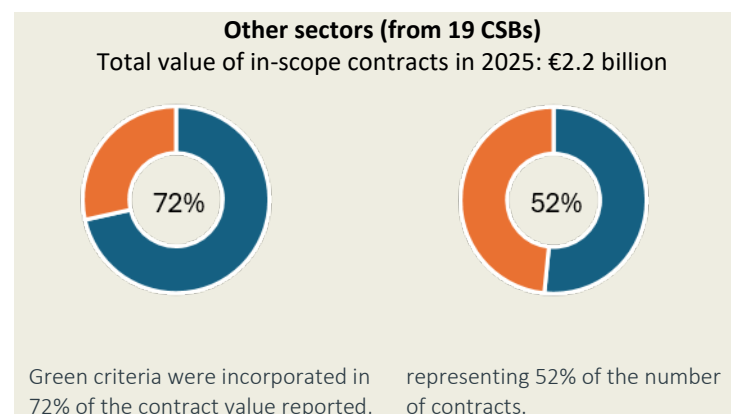


- Two of the priority sectors had low levels of GPP implementation: ICT products and services, and heating equipment.²¹ ICT products and services is a large area of spend across the CSBs (€411m across 182 contracts), of which 37 contracts (63%) with a value of €260m included green criteria. However, 145 ICT contracts with a combined value of €151m in 2025 did not include green criteria.

²¹ 10 contracts were reported in the Heating equipment sector with a combined value of €2.2m of which 2 contracts included GPP criteria.

Other sectors

- Across the 'other sectors' for which published national GPP criteria are not currently available, data from the 19 CSBs indicates a total contract value of €2.2bn across c.1,000 contracts in 2025. Of these contracts, 72% (2024: 17%) of the total contract value incorporated green criteria, and 52% (2024: 25%) of the total number of contracts signed incorporated green criteria.



- Across the 19 CSBs, professional services accounted for €221m (2024: €612m) in contracts in 2025, and green criteria were incorporated in 35% (2024: 10%) of these contracts representing 54% (2024: 1%) of the total value of these contracts.

Observations

- Four CSBs did not provide GPP data for 2025 meaning the dataset does not fully reflect the total value or total number of contracts that incorporated green criteria across the CSB sector.
- The findings indicate that in nearly all of the priority sectors GPP implementation is very high, with the exception of ICT products and services. In other non-priority sectors, there is significant scope to increase GPP implementation by the CSBs.

6 Climate-related Disclosures

- Within Commitment 5 of the Framework, there is a commitment to identify and achieve compliance with a climate-related financial disclosures framework that is relevant and appropriate to the CSB's activities and sector(s), by 2024.
- Prior to the publication by the EU Commission of its Omnibus proposals in February 2025, the majority of CSBs were in scope of CSRD and reporting under CSRD was the intended approach to meet Commitment 5 obligations, in some cases supplemented by reporting under other disclosure frameworks.
- Part of the Omnibus Package, the "Amending Directive", significantly narrows the scope of CSRD. The requirements of the CSRD apply only to companies with over 1,000 employees and net annual turnover in excess of €450m. This removed a large proportion of previously in-scope entities. Reporting for EU companies within the revised scope will begin in respect of financial year 2027 (with reports due in 2028/2029), subject to national transposition of the Amending Directive.
- The Voluntary Standard (formerly VSME) provides a framework for sustainability reporting by smaller companies outside the scope of the CSRD.
- This section provides:
 - a brief summary of changes in the CSRD scope and reporting framework and an update on the VSME/Voluntary Standard;
 - an overview of some of the preparatory activities undertaken by CSRD in-scope CSBs, including in relation to double materiality assessments and the EU Taxonomy; and
 - an outline of the approach to climate-related financial disclosures being taken by those CSBs who are not/no longer in scope of CSRD.

²² https://eur-lex.europa.eu/eli/reg_del/2026/1563/oj

6.1 Developments in Reporting Frameworks

CSRD

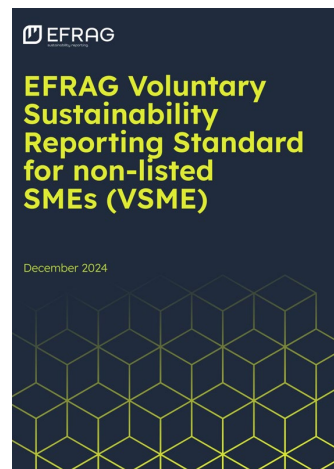
- CSRD was transposed into Irish law in July 2024 via the European Union (Corporate Sustainability Reporting) Regulations. Amendments were made in 2024 (No.2 Regulations) and July 2025 (including "Stop-the-Clock" which postpones the reporting requirements on Wave 2 and Wave 3 companies by two years), and the further amendments outlined in the Amending Directive require Member State transposition by March 2027.
- Companies subject to CSRD must report in accordance with the European Sustainability Reporting Standards (ESRS). Following public consultation, the European Commission adopted revised ESRS in July 2026. The delegated act establishing the revised standards was published in the Official Journal of the European Union (OJEU) in September 2026²². The revised standards will enter into force on 10 November 2026 and will apply mandatorily to financial years beginning on or after 1 January 2027, with optional early application for financial year beginning in 2026.
- These developments build on the broader Omnibus simplification process, which has narrowed the scope, thresholds and timing of application. The Commission's revised ESRS introduce a number of targeted refinements intended to improve the clarity, consistency and operability of the standards.²³ Key changes include clarification regarding the treatment of estimated financial impacts, permitting revisions in subsequent reporting periods without this constituting a reporting error, and enhanced disclosure requirements where transition plans are not aligned with a 1.5°C pathway. Additional flexibility has also been provided in determining GHG reporting boundaries. The revisions aim to improve transparency through mandatory disaggregation of fossil fuel revenues, while providing greater precision in the definition of "substantiated" human rights and discrimination incidents. Certain previously proposed disclosures have been removed, including

²³ https://finance.ec.europa.eu/news/commission-adopts-revised-sustainability-reporting-standards-reduce-administrative-burdens-eu-2026-07-03_en

those relating to secondary microplastics, streamlining the overall reporting framework²⁴.

The Voluntary Standard (previously VSME)

- The VSME, developed by the European Financial Reporting Advisory Group (EFRAG) and since recast as the 'Voluntary Standard', is designed to support sustainability reporting by companies not subject to CSRD requirements.



- The VSME was submitted by EFRAG to the European Commission in December 2024²⁵ and was recommended by the European Commission in July 2025.
- In July 2026, following a public consultation process, a voluntary sustainability reporting standard based on the VSME was formally adopted by the European Commission alongside the revised ESRS referred to above.

²⁴ https://ec.europa.eu/finance/docs/level-2-measures/csrd-delegated-act-2026-5010_en.pdf

²⁵ <https://www.efrag.org/en/projects/voluntary-reporting-standard-for-smes-vsme/concluded>

²⁶ https://eur-lex.europa.eu/eli/reg_del/2026/1560/oj

The Voluntary Standard was published in the OJEU in September 2026 as Commission Delegated Regulation (EU) 2026/1560²⁶.

- The Voluntary Standard is structured in two modules.²⁷
 - The Basic module represents the entry level of reporting and sets out a streamlined set of core disclosures across key environmental, social and governance topics, including general information, environmental metrics (such as energy use and greenhouse gas emissions), workforce information and business conduct. It is designed as the minimum reporting baseline and applies to all entities adopting the standard, with disclosures required on an 'if applicable' basis.
 - The Comprehensive module builds on the Basic module by requiring additional disclosures where more detailed information is needed, particularly to respond to data requests from banks, investors and larger counterparties. These include disclosures on strategy and business model, climate transition plans and targets, climate risks, human rights policies and governance matters.
- Application of the Basic module is a prerequisite for applying the Comprehensive module.

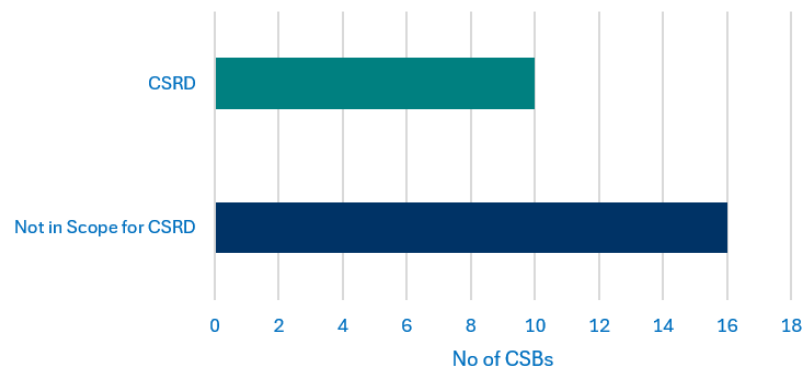
²⁷ <https://www.efrag.org/sites/default/files/sites/webpublishing/SiteAssets/VSME%20Standard.pdf>

6.2 CSBs in scope of CSRD

- Based on the revised CSRD thresholds,
 - Nine of the 26 CSBs have confirmed that they remain in scope for CSRD reporting;
 - One further CSB stated that it plans to report under the CSRD framework on a voluntary basis; and
 - The remaining 16 CSBs have confirmed that they are out of scope of CSRD.
- The reported CSRD status of each CSB reflects the entity's own assessment of its position under the revised CSRD scope criteria. NewERA has relied on these assessments and has not undertaken an independent review or verification of CSRD applicability in respect of the CSBs.

- Seven of the 10 CSBs preparing for CSRD reporting plan to publish their first CSRD disclosures in 2028 based on financial year 2027 data.
 - One of these CSBs has already published a CSRD-aligned sustainability report in 2026 based on financial year 2025 data as part of their preparations for a CSRD-compliant sustainability statement for financial year 2027.²⁸
 - One CSB has published VSME-aligned disclosures within its 2026 sustainability report as a preparation for CSRD reporting in 2028.²⁹

Climate-related disclosure reporting



²⁸ [ESB CSRD aligned sustainability report 2025](#)

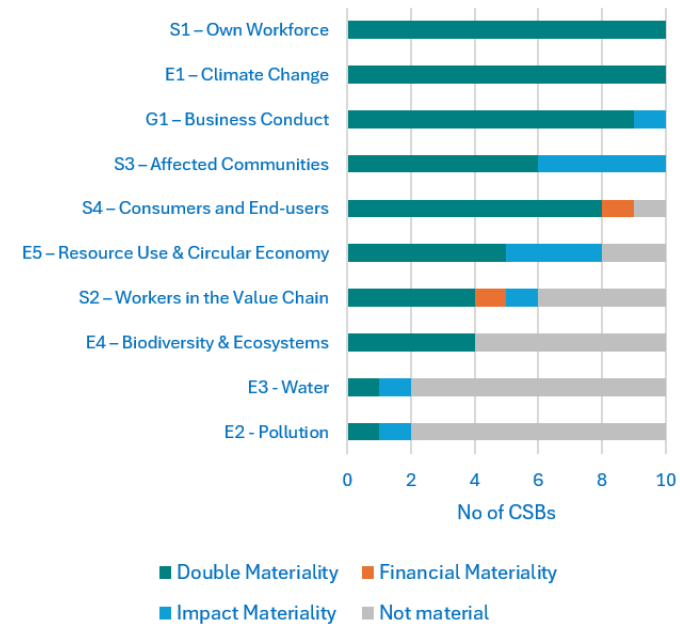
²⁹ [Vhi sustainability report 2026](#)

Double Materiality Assessment (DMA)

- For the CSBs preparing to report under CSRD, completing a DMA is a key step in building the foundation for their sustainability reports. The DMA is the basis for determining which material topics the CSB will be required to include in their sustainability disclosures. In carrying out a DMA, companies are required to identify sustainability matters that are material from either or both an impact (inside-out) and financial (outside-in) perspective, and it remains a mandatory and assured requirement underpinning ESRS reporting.³⁰
- While unchanged in concept since the ESRS were introduced in 2023, the application of DMAs has evolved significantly under the Omnibus proposals. There is now a more streamlined and proportionate approach, with greater emphasis on alignment to business model and strategy and increased use of management judgement supported by reasonable evidence. This represents a shift away from process-driven compliance towards a more focused assessment of material sustainability risks and impacts.
- A high-level summary of the findings of the DMAs carried out by the 10 CSBs preparing for CSRD is set out in the chart opposite.
- The results of the DMAs across the 10 CSBs preparing to report under CSRD indicate a strong degree of alignment on a core set of environmental, social and governance topics. Climate change (E1) and own workforce (S1) were each identified as double material by all 10 CSBs, representing the most consistently material topics. Business conduct (G1) and consumers and end-users (S4) were also widely assessed as double material, by nine and eight CSBs, respectively. One further CSB assessed consumers and end-users (S4) as financially material only. Affected communities (S3) demonstrated a high level of impact relevance, with six CSBs identifying it as double material and a further four as impact material only.

³⁰ Under the VSME, the same principles are applied in a simplified and non-mandatory form, providing a proportionate framework for entities outside full CSRD scope.

Double Materiality Assessment Findings



- Other environmental topics show greater divergence. Resource use and circular economy (E5) was identified as double material by five CSBs, with three additional impact-only classifications. In contrast, water (E3) and pollution (E2) were most frequently assessed as not material, each by eight CSBs, while biodiversity and ecosystems (E4) showed a mixed profile, with six not material classifications.
- Overall, the findings suggest clear convergence around climate, workforce and governance-related topics, with more varied assessments across broader environmental and value chain considerations. The findings reflect the diversity of business activities across the CSBs, while also highlighting the shared significance of climate change as a consistently high-impact and material issue.

EU Taxonomy disclosures

- The EU Taxonomy Regulation ((EU) 2020/852) (the Taxonomy Regulation) provides a classification system to assess and report the environmental sustainability of economic activities. The regulation aims to inform investors on whether an economic activity is environmentally sustainable by setting common EU-wide criteria³¹.
- CSBs within the scope of CSRD are generally required to disclose, as part of their annual reporting, the extent to which their activities are covered by the EU Taxonomy (Taxonomy eligibility) and meet the applicable technical screening criteria (Taxonomy alignment). These disclosures apply where an entity is subject to Article 8 of the Taxonomy Regulation, the scope of which broadly aligns with, but is not fully identical to, CSRD applicability.
- The EU Taxonomy assessment forms a complementary component of CSRD preparation and is typically progressed in parallel with core reporting workstreams before being finalised as part of the overall sustainability statement.
- Of the 10 CSBs preparing for CSRD, one has published taxonomy disclosures pursuant to Article 8 of the Taxonomy Regulation on a voluntary basis³², a further eight CSBs are in the process of preparing taxonomy disclosures, and one has yet to commence preparations. Two further CSBs that have fallen out of scope of CSRD have also published taxonomy disclosures.³³

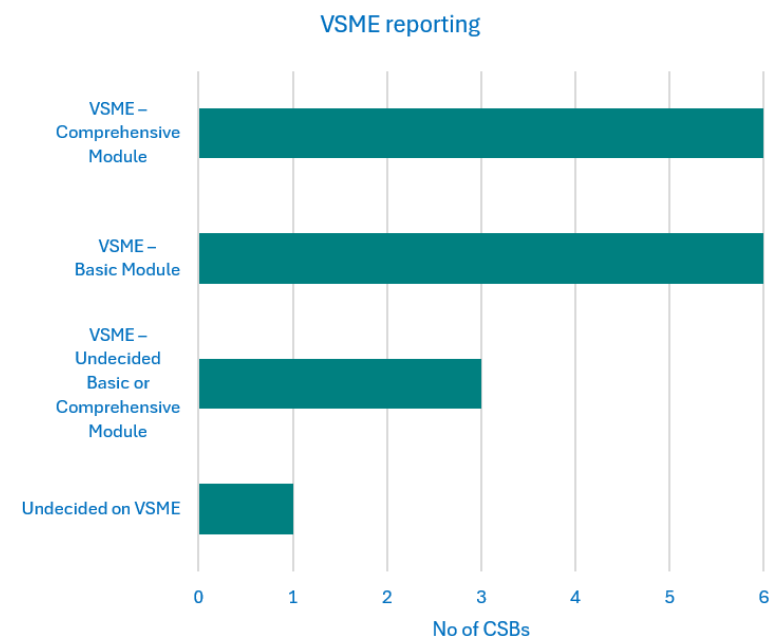
³¹ <https://eur-lex.europa.eu/legal-content/TR/LSU/?uri=celex:32020R0852>

³² [ESB Sustainability Report 2025](#)

³³ [GNI-Directors-Report-and-Financial-Statements-2023](#); <https://www.bordnamona.ie/legal-requirements/>

6.3 CSBs not in scope of CSRD

- As noted above, 16 CSBs have confirmed that they are out of scope of CSRD. These CSBs have advised that they are considering or have already decided to report in accordance with the VSME³⁴ framework.
- Within this cohort, 12 CSBs have committed to either the Basic or Comprehensive module (six in each category), indicating a broadly even split between entry-level and more detailed reporting approaches. A further four CSBs have yet to finalise their approach, including 1 undecided on VSME adoption and three assessing the appropriate module (basic or comprehensive).

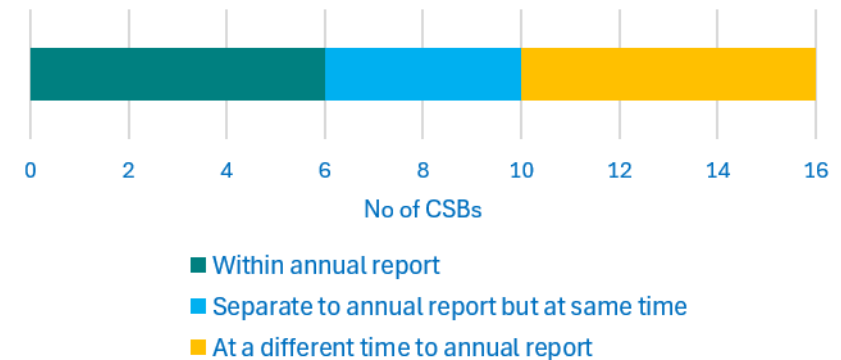


³⁴ As noted on page 24, the VSME has since been recast as the Voluntary Standard. At the time CAF implementation updates were submitted, VSME was the terminology in use and is therefore retained where quoted or referenced in CSB submissions.

VSME preparations

- One CSB published a VSME report in 2026 on financial year 2025³⁵.
- Of the other 15 CSBs preparing or considering preparing VSME reports there are varying degrees of progress.
 - One CSB had published its 2024 sustainability report guided by the CSRD framework and DMA topics. The VSME Standard covers many of the same sustainability themes found in the CSRD ESRS, including climate change, pollution, biodiversity, water, circular economy, workforce issues, business conduct, climate risks, transition planning and governance disclosures. The experience, data collection processes and reporting structures developed through CSRD preparedness may support a transition to VSME reporting.
 - Eight further CSBs have published sustainability updates as part of their annual reporting, however these are not yet aligned with VSME.
- Although it is not a requirement, many of the CSBs preparing for VSME have undertaken a Double Materiality Assessment and/or an initial gap analysis. Several CSBs are advancing governance arrangements for reporting structures. Data readiness is a common focus, including “gathering information on fuel usage, electricity usage” and developing a “greenhouse gas emissions baseline”. Others remain at an earlier stage, noting “we are at early stages and not yet ready to report”.
- A mixed approach to VSME disclosure timing is evident, with six CSBs intending to publish within their annual report, four CSBs planning to report alongside, but separate to, the annual report, and six CSBs planning to publish VSME disclosures at a different point in time, indicating no single dominant reporting practice across the sector.

VSME publication intentions



³⁵ [The Shannon Airport Group VSME Sustainability Report](#)

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 2026.

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

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Appendix B

Green Public Procurement (GPP) by the CSBs

Priority Sectors and Other Sectors (2025)

Sector	Total # contracts	Total value €m	Total # contracts with GPP	Total value with GPP €m	Total value with GPP %
Priority Sectors (sectors with national GPP criteria)					
Road Transport, vehicles and services	2,143	€589	2,134	€586	100%
ICT Products and Services	182	€411	37	€260	63%
Office Building Design, Construction & Management	58	€284	31	€273	96%
Food & Catering Services	9	€93	8	€93	100%
Energy-related Products	43	€42	39	€41	98%
Furniture & Related Services	7	€23	7	€23	100%
Indoor Cleaning Services	5	€14	4	€14	99%
Paper Products & Printing Services	10	€12	7	€11	93%
Textiles Products & Services	6	€24	6	€24	100%
Indoor & Outdoor Lighting	9	€5	8	€5	98%
Heating Equipment	10	€2	2	€1	51%
Sub-total	2,478	€1,499	2,274	€1,323	88%
Other sectors (sectors without national GPP criteria)					
Professional Services	263	€221	91	€119	54%
Other	768	€1,944	441	€1,430	74%
Sub-total	1,031	€2,165	532	€1,549	72%
Overall Total	3,509	€3,664	2,806	€2,872	78%

Note: The "total number of contracts" referred to in this table relates to contracts with a value over €50,000 signed in 2025 by the 19 CSBs that completed the GPP reporting template.

Appendix C

Circular Economy Case Studies

The case studies set out below were provided by a number of CSBs and are reproduced here as examples of the work being undertaken in the area of circular economy.



Case Study



As Ireland's national postal operator, An Post serves 2.5 million delivery points every working day and more than one million customers each week through its Post Office network, giving it a unique national platform to support Ireland's transition to a circular economy. An Post's Circular Economy Strategy is a core component of the organisation's sustainability strategy and is focused on reducing waste, extending product life cycles and supporting more sustainable consumer behaviour.

Through this strategy, An Post has embedded circular economy principles across customer propositions, partnerships, operations and community engagement, with a focus on making reuse, repair, return, resale and recycling simple, accessible and cost-effective for customers and businesses.

A central element of this strategy is enabling consumer-to-consumer reuse, particularly through partnerships with resale platforms. Integration with Vinted allows customers to generate prepaid shipping labels directly within the platform, simplifying the process of sending pre-loved items. This has supported strong growth in both domestic and international resale transactions and reflects a broader societal shift towards reuse.

Rather than treating circularity as a standalone initiative, An Post has integrated it into product design and customer offerings. A key example is An Post's prepaid packaging range, redesigned to support peer-to-peer resale by removing weight restrictions and introducing flat-rate pricing under the simple customer proposition, "if it fits, it ships." This makes sending preloved items easier and more predictable, while using packaging that is certified as 100% recyclable and made from recycled materials.

In 2025, An Post partnered with Oxfam to launch PostBack, a nationwide service allowing customers to donate preloved items free of charge through Post Offices or home collection. The initiative links circular behaviour with social impact and, since launch, more than 50,000 PostBack bags have been distributed.

An Post also supports repair and recycling models through initiatives such as the Nespresso capsule return programme, which allows customers to return used capsules through Post Offices or home collection. These services can be booked on the An Post app, which makes it so easy for customers to be circular. The average monthly drop off and collection figures for Nespresso alone in 2026 so far shows how easy it is to be circular, with an average of 7,807 collections and drop offs per month in 2026.

Beyond enabling circular transactions, An Post is helping to build a culture of circular living in Ireland. This is done through our Saol Eile (Another Life) content series and Sell it, Send it, Cash it in platform, designed to educate and inspire consumers on practical ways they can participate in the circular economy. We show real examples of reuse, repair, resale and donation by demonstrating how everyday items can be given a second life. This, combined with a physical presence at concerts and festivals targeting younger audiences, including Vision Ireland's Post & Party festival pop up, encourages positive behaviour change while reinforcing An Post's role as a practical enabler of sustainable living. An Post also makes circular living relevant throughout the year through seasonal partnerships and campaigns, including Oxfam's Secondhand September, and Christmas campaigns promoting the sending, gifting and donation of pre-loved items.

The overall impact of An Post's Circular Economy strategy is already significant. In 2025 alone, more than five million items were sold or donated through An Post's digital platforms, Post Offices, prepaid packaging and delivery services.

Looking ahead, An Post will continue to expand PostBack and donation partnerships, promote preloved gifting, donation and resale, strengthen circular partnerships with business customers and brands, and continue developing reusable packaging solutions. In line with its sustainability strategy, An Post is positioning its network as a practical national enabler of circular living helping customers, communities and businesses keep resources in use for longer while reducing waste across Ireland.



Source: An Post

Case Study



Dublin Airport drove change by recognising the value of waste. Following a successful similar initiative in 2024, during the refurbishment of Terminal 1 and the 51st & Green lounges in 2025, we successfully rehomed and reused most of the older furniture. These items, once considered waste, have instead been used to refurbish our staff breakrooms and support daa charities.

Additionally, it was one of our own 'Sustainability Ambassadors' (passionate volunteers from across the business) who highlighted the potential of this initiative and worked in collaboration with the team at Dublin Airport.

When the T1 Lounge closed for refurbishment, approximately 70% of lamps, chairs and tables were reutilised for staff break rooms. daa then donated remaining items, such as stands and serving dishes to local charities and daa charity groups.

Building on this success, the refurbishment of 51st & Green adopted a campus-wide reuse approach, resulting in approximately 95% of lounge furniture being retained and repurposed.

Over 100 pieces of furniture were redistributed across the airport campus, including staff breakrooms, passenger-facing areas, and previously underutilised spaces such as corridors, which were transformed into rest areas near the gates. This initiative highlights how we can continually identify opportunities to improve resource efficiency and drive more sustainable outcomes across the business.



Source: daa



Case Study

Fleet Systems Support Electronic Repair Shop, Drogheda



A repair shop was started in our Drogheda Depot in 2009 by a group of Technicians and Engineers as a trial. To date, it has shown a total savings of €42.5 million with an average of €5.5 million saved per annum by fixing components in-house.

Approach Taken

Train components are often sent to off-site facilities for repair or discarded and replaced if too costly to send away for repairs. Repairing on-site increases the longevity of components and improves overall fleet performance by providing faster turnaround times. From an environmental perspective, repairing a part in house saves on material usage, transport and disposal.

The emissions savings from avoiding new parts production and transport have yet to be calculated but are expected to be substantial. Over 2,700 components are repaired annually from small value (€25) up to larger value (€70,000-80,000).

Parts harvesting is also utilised in the repair shop which reduces the risk associated with an increased worldwide shortage on even minor components.

Overall, an in-house repair shop greatly contributes to our company's Circular Economy strategy.

Carbon Savings Calculations – Estimation per Annum

Process	Assumption	Total kg per unit	Avg CO2e (per kg)	Est Qty per year	Total CO2e Saved (kg)
Electrical Components	Mixed materials (steel, aluminium, copper, PCB, rare earth magnets, etc.), avg weight - 15kg each	15	15	500 units	112,500
Heavy Metal Parts reused	Mixed steel and aluminum components (10 tonnes per year)	1000	2	10	20,000
Avoided Transport Emissions	Average transport distance from Germany/Spain to Ireland: 2,000 km. Heavy goods vehicle emissions: 0.1kg CO2e per tonne-km.	7,500 kg electrical components + 10,000 kg metal parts = 17,500 kg	0.0001	20,000 km (10 trips per annum)	35,000
Total kg CO2e saved					167,500
Total tonnes CO2e saved per annum					167.5



Challenges and Learnings

In-house repairs require the deconstruction of components to learn the art of repairs. Unfortunately, this is not part of our normal heavy maintenance processes globally. "Faultfinding" training is required of personnel, which takes time to develop. Investing in the time up front and scheduling in part-time training along with normal maintenance shift hours ensures an increase in the number of repairs performed while not deducting significantly from normal labour hours. Space constraints for repair facilities in busy workshops/depots has also been a challenge. Integrating a repair shop as part of the maintenance works practices requires a switch in mindset, but the cost benefits are highly influential.

Expansion plans are in the works. More depot operatives are being trained in the art of electronic fault finding and the scope is expanding to include a greater variety of components such as pneumatic overhauls and other types of repairs.



Source: Irish Rail



Case Study



Code Green

Code Green is Vhi's clinical waste reduction programme, designed to improve waste segregation and reduce the environmental impact of healthcare operations while maintaining high standards of care.

Launched in 2023, the programme was piloted in Urgent Care at the Vhi 360 Health Centre in Carrickmines before being rolled out across all Vhi 360 Health Centres. The programme supports colleagues to make more sustainable choices through improved bin configuration, clear labelling and targeted training, helping ensure that waste is managed appropriately and efficiently in busy clinical environments.

Healthcare Risk Waste (HCRW) has a significantly higher environmental impact than general or recycled waste. Code Green focuses on reducing unnecessary HCRW by ensuring that non-risk materials are correctly segregated, supporting both environmental and operational improvements.

Impact and outcomes

The programme has delivered strong results across participating sites:

- **34% reduction** in HCRW per patient
- **20% increase** in recycling volumes
- **c.20% reduction** in waste-related carbon impact
- Reduced waste management costs, while maintaining care quality and patient -- experience

The programme has also been supported by strong colleague engagement, with increased awareness and understanding of waste segregation practices across clinical teams.

Recognition

Code Green has received national recognition for its impact and innovation, including:

- *Green Healthcare Achievement Award* at the Private Healthcare Awards in 2025
- *Sustainability Award* at the Irish Healthcare Awards in 2025
- Finalist in the Green Awards 2026 (*Green Healthcare category*)

Galway Vhi 360 Health Centre

The expansion and redevelopment of the Galway clinic into a Vhi 360 Health Centre provided a valuable opportunity to integrate circular economy principles, aligning environmental sustainability with positive community impact. The project prioritised the reduction of construction and refurbishment waste by minimising landfill disposal and maximising the reuse and recycling of materials. This approach ensured that high standards of quality and delivery were maintained while significantly lowering the project's environmental footprint.

A structured, data-led approach was applied, supported by strong local engagement. A total of 360 items were recorded, including:

- Clinical equipment, such as IV trolleys and ECG machines
- Non-clinical items, including whiteboards, chairs, desks, shelving, clocks and kitchen units

These assets were carefully assessed and redirected into the circular economy. Items were rehomed across local schools, charities and community organisations, as well as within Vhi's own network. Others were retained for future use or responsibly recycled, with only unusable items disposed of.

Impact and outcomes

The project demonstrates how circular redevelopment can deliver measurable environmental, social and business value:

- 90% of items diverted from landfill, including 66% reused and 24% recycled (10% disposed due to being unusable)
- Reduced demand for new materials, avoiding associated carbon emissions
- Direct support for local communities, including schools, childcare facilities, charities, Men's Sheds and community hubs
- Near cost-neutral delivery, achieved through avoided procurement and efficient redistribution
- Increased colleague engagement, helping to embed circular thinking across Vhi

Recognition

The redevelopment project has been recognised at national level for its sustainability impact and innovation, including:

- Finalist, Irish Healthcare Awards 2025 (Sustainable Healthcare Initiative category)
- Finalist, Private Healthcare Awards 2025 (Green Healthcare Achievement category)



Source: Vhi





Case Study

Collaboration Pillar - Our Circular Economy Ambition:
Circular solutions considered at each phase in all UÉ capital projects



Case study - Saggart Reservoir (Co. Dublin) - UÉ & Coffey's

- 100ML covered reservoir - 40 Olympic swimming pools
- 150,000m³ subsoil excavation - 52,000m³ reused on site & 98,000m³ reused off-site (Article 27)
- Existing concrete tanks demolished & reused as hardcore for haul roads
- 200 tonnes of reinforcement steel recycled
- Low carbon concrete used
- Circular economy principles - significant cost & carbon savings
- Minimal disruption during the construction works
- Biodiversity habitat enhancement - wildflower reservoir roof

[Saggart Reservoir](#)



Source: Uisce Éireann

Case Study



Eirgrid × KSG Sustainability Catering Partnership

This case study summarises how EirGrid and KSG have partnered since 2022 to deliver catering services across EirGrid sites with sustainability embedded into day-to-day operations. It highlights key interventions and the outcomes achieved to date.

Overview

EirGrid has partnered with KSG since 2022 to deliver catering services across its sites, with sustainability embedded into service delivery. The partnership focuses on reducing environmental impact, supporting responsible sourcing, and aligning catering operations with EirGrid's wider sustainability objectives.

Key interventions

- **Biodiversity & nature action:** Investment in biodiversity beyond Ireland through reforestation at the Monte Verde coffee farm in Brazil, planting 500 trees per year to enhance ecosystems, support soil health, and contribute to long-term climate resilience.
- **Food waste prevention & circularity:** Menu planning, portion control and reuse of prepared items (blast chilled and repurposed) to minimise waste—for example chilli bolognese reused for burritos; leftover vegetables for soup; leftover chicken for sandwiches/salads; soup repurposed as a base for curry dishes and sauces. Cooking oil is recovered and recycled into biodiesel, supporting circular economy outcomes.
- **Elimination of single-use plastics:** Delivery of a plastic-free restaurant model, reducing reliance on disposable cups, bottles and packaging through reusable systems, supplier take-back schemes and customer engagement initiatives (e.g., keep-cup programmes).
- **Staff engagement & behaviour change:** Sustainability embedded through regular training, toolbox talks and site-level sustainability champions, reinforcing day-to-day actions such as energy shut-down policies, waste segregation and responsible resource use.
- **Improving measurement & evidence:** Where compostable figures include both kitchen and front-of-house bins, reporting is being refined to register kitchen waste separately to improve traceability and evidence of kitchen waste performance.

Example KPI / contract performance clause (illustrative)

KPI 1 – Environmental and sustainability initiatives. The Service Provider will work with the Client and the Client's waste management contractor to minimise all waste streams where possible and to collaborate on achieving EirGrid's sustainability parameters.

- **Evidence / delivery examples:** Implementation of the 'Cutting the Carbon' programme, aligned to the Net Zero Origin Green initiative.
- **Food waste measurement & reduction:** Monitor, measure and reduce food waste; provide food waste reports; implement supporting solutions (e.g., introduction of a bio-processor where appropriate).
- **Compliance with client-wide initiatives:** Provide reports/logs to evidence actions such as utilising compostable and biodegradable disposables, maintaining food waste logs, and supplying waste management reports as requested.
- **Waste stream reporting:** Measure different waste streams and report monthly (e.g., landfill, recycling, compost/organic, cooking oil recovery).
- **Reporting route / governance:** Monthly waste figures are provided to EirGrid's facilities partner and shared onward with the sustainability team for wider performance tracking and reporting.

Outcomes

- In June 2023 introduced keep cup initiative, since serving over 200K coffees in reusable cups eliminated the same number of paper cups from landfill.
- Reduced waste to landfill (including bottles, food waste and other disposables).
- Low food waste is reinforced by operational efficiency: minimising waste supports sustainability outcomes while protecting the catering budget and cost base.
- Lower carbon and packaging impacts across catering operations.
- Enhanced biodiversity and environmental stewardship.
- Strong alignment with national commitments (Origin Green, Ireland's Food Waste Charter) and broader frameworks (e.g., UN SDGs).
- Tangible sustainability outcomes delivered at site level for EirGrid.

Source: EirGrid 



Gníomhaireacht Bainistíochta an Chisteáin Náisiúnta
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