

NewERA Report

Climate Action Framework Q1-2024 Implementation Update

June 2024



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 the Environment, Climate and Communications (DECC) on the implementation of the Climate Action Framework (the 'Framework') by the commercial semi State sector as at 31 December 2023. NewERA has had an action under each of the annual Climate Action Plans (CAP) since 2021 to report to DECC on the implementation of the Framework in Q1 and Q3 each year (in the CAP 2024 this action is number PS/24/5).
- The Framework was developed in consultation with the commercial semi-State bodies (CSBs). 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 named below 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 2024. The form was completed by each of the 26 CSBs, with information as at 31st December 2023. The questions covered a range of topics within the 5 commitments.
- This report focuses primarily on material from new questions introduced in the questionnaire in Q1 2024, in relation to commitments 1 (Governance of Climate Action Objectives), 4 (Circular Economy and Green Procurement) and 5 (Climate-Related Disclosures). In addition, this report includes a number of case studies prepared by the CSBs in the areas of circular economy and green procurement initiatives. These case studies are presented as submitted by the CSBs.



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.
- 17 CSBs are undertaking all five of the best practice governance elements outlined under Commitment 1, and the other nine CSBs are undertaking at least three of these best practice elements.
- All 26 CSBs have targets in relation to energy efficiency and GHG emissions, and more than half of the CSBs have targets in relation to waste reduction, biodiversity and/or sustainable procurement.
- As regards climate adaptation, a new area of focus in this report, eight CSBs have incorporated adaptation into their climate action objectives, one CSB has a Board approved Adaptation Plan in place and nine 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 17 CSBs.

Commitment 2 Emissions Measurement & Reduction Target

- 25 CSBs are reporting to SEAI via the M&R system and 24 CSBs have adopted SEAI assigned emissions reduction and energy efficiency targets for 2030.
- 21 CSBs have, in conjunction with the SEAI, modelled an emissions pathway towards their 2030 targets and identified the key investments required.

Commitment 3 Emissions Valuation in Investment Appraisal

- 12 CSBs have measured the net change in tonnes of CO2 equivalent GHG emissions associated with an investment.
- Five CSBs have monetised GHG emission impacts in an investment appraisal using the price of carbon from the Public Spending Code and a further six CSBs plan to do so in the future.

Q1 2024 CSB RESPONSES COMMITMENT 1-3			
	No. CSBs	Change vs. last update (Q3 2023)	
Commitment 1 - Governance of climate action objectives			
Climate action objectives approved at Board level	26	+3	↑
Climate action objectives incorporated into investment strategy	23	+1	↑
Progress against climate action objectives reported to the Board	23	+1	↑
Intention to disclose progress against climate action objectives ¹	23	-2	↓
Climate risks included in risk management processes	25	+1	↑
Commitment 2 - Emissions measurement & reduction target			
SEAI M&R reporting in place	25	-	↔
2030 targets adopted	24	+1	↑
2030 emissions pathway modelled	21	+1	↑
Processes to monitor progress towards emissions targets	23	+1	↑
Commitment 3 - Emissions valuation in investment appraisal			
Measured GHG impact in investment appraisals	12	+2	↑
Monetised GHG impact in investment appraisals	6	-	↔
Plans to monetise GHG impact in investment appraisals	11	-	↔
Monetised GHG impact has influenced investment decisions	6	+1	↑
Total CSBs reporting	26	-	↔

Notes to table:

- In Commitment 1, there was a decrease of two in the number of CSBs intending to publish progress against their climate action objectives in their next publication. On review, these CSBs have determined that they are not in a position to publish progress against their climate action objectives in their next publication as previously envisaged, however they have not ruled out publishing this information at a later date.



Commitment 4 Circular Economy and Green Procurement

- 14 CSBs have developed a circular economy strategy and 23 CSBs have adopted circular economy initiatives, such as waste minimisation and/or enhancing the efficient use of resources.
- 21 CSBs have incorporated green procurement (GP) principles into their procurement policies and documentation, and 11 CSBs are tracking the number and value of signed contracts that incorporate green procurement criteria.

Commitment 5 Climate-related Disclosures

- 15 CSBs are preparing a double materiality assessment (DMA) in preparation for the CSRD, however 11 CSBs have yet to start preparing for a DMA.
- Three CSBs have published disclosures pursuant to Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation) and seven further CSBs are preparing these disclosures.
- Nine CSBs are currently reporting under one or more of the following climate-related disclosure frameworks: TCFD, GRI and CDP. Seven CSBs report under two of these frameworks, one CSB reports under all three frameworks, and two CSBs report under one of these frameworks. 11 CSBs are not planning to report under TCFD, GRI or CDP.

Key Themes

- Sections 3 to 6 of this report elaborate on the key themes identified in the responses received in relation to Commitments 1, 3, 4 and 5.
- In relation to Commitment 2 (Emissions Measurement & Reduction Target), the Q3 2023 Climate Action Framework Implementation Report contains the most recently available data published by the SEAI on the CSBs’ progress towards their 2030 targets.

Q1 2024 CSB RESPONSES COMMITMENT 4-5			
	No. CSBs	Change vs. last update (Q3 2023)	
Commitment 4 - Circular economy and green procurement			
Developed a circular economy strategy ¹	14	-1	↓
GP principles incorporated in procurement practices	21	+2	↑
Plans to disclose green procurement policy/practices ²	22	-1	↓
Tracking contracts with green procurement criteria*	11	n/a	n/a
Commitment 5 - Climate-related disclosures in financial reporting			
Double materiality assessment in progress for CSRD	15	+2	↑
Subject to EU Taxonomy & Article 8 Disclosures*	15	n/a	n/a
Published Taxonomy Disclosures*	3	n/a	n/a
Reporting under GRI	3	-	↔
Reporting under TCFD	6	+1	↑
Reporting under CDP	8	+1	↑
Total CSBs reporting	26	-	↔

Notes to table:

* indicates a new question introduced in the latest questionnaire.

- In Commitment 4, the number of CSBs that have developed a circular economy strategy reduced from 15 to 14, because one CSB updated its response to this question due to ongoing work on circular economy and resource use which is being incorporated into a broader sustainability plan.
- The number of CSBs with plans to disclose green procurement practices in their upcoming reports decreased from 23 to 22, as one CSB noted that their green procurement policy is less advanced than they had previously anticipated.



3 Climate Action Objectives of the CSBs

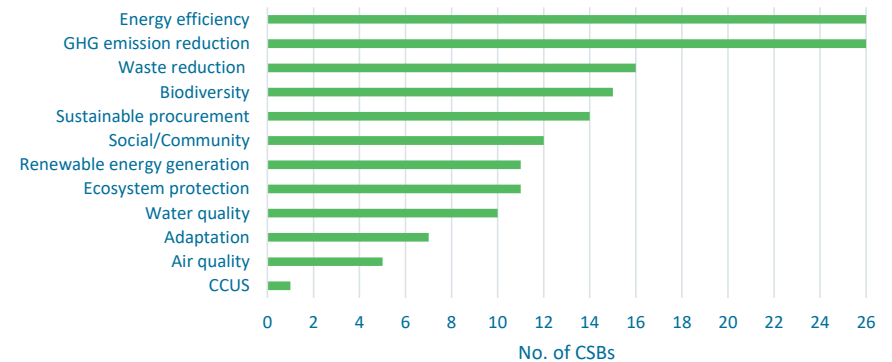
- All 26 CSBs have climate action objectives that have been approved at Board level, an increase of three since the last update.
- 23 CSBs have climate action objectives that have been incorporated into their investment strategies, and 23 CSBs report progress to their Boards on their climate action objectives, an increase of one, in both cases, since the last update.
- Of the 26 CSBs, 21 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.

- waste reduction (16 CSBs),
- biodiversity (15 CSBs), and/or
- sustainable procurement (14 CSBs).
- As shown in the chart, seven CSBs have targets associated with adaptation. Adaptation is discussed in more detail in Section 3.2 below.

3.1 Targets associated with Climate Action Objectives

- Our previous reports outlined the number of CSBs that measure their progress against their climate action objectives frequently and that provide periodic progress reports to their Boards in this regard. As part of the Q1-2024 report, we asked CSBs to provide details of their targets underpinning their climate action objectives. The inclusion of a target alongside a climate action objective enables companies to measure their progress in achieving that objective.
- All 26 CSBs have targets in relation to GHG emissions and energy efficiency that are published as part of SEAI’s monitoring and reporting system.¹ Other areas where CSBs have targets associated with their climate action objectives include (as illustrated in the chart below):

Areas where CSBs have targets associated with their climate action objectives



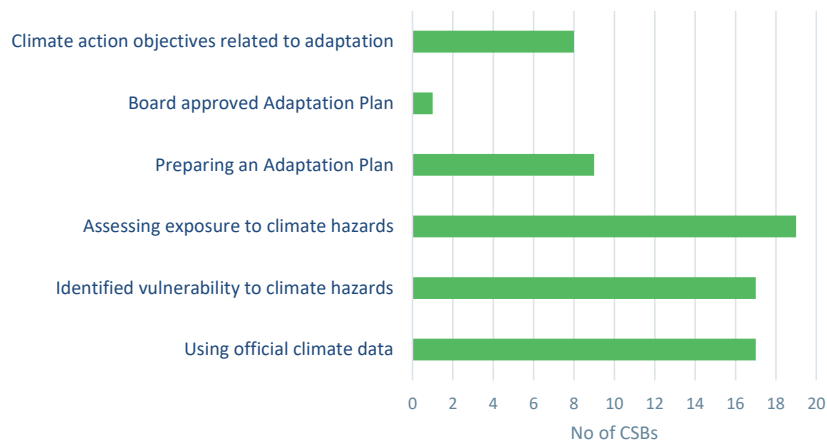
¹ Each annual Climate Action Plan (CAP) since 2021 has set an emission reduction target for the public sector of 51% by 2023, alongside an energy efficiency improvement target of 50%.



3.2 Climate Adaptation

- Adaptation is defined as taking measures to counter current or expected climatic impacts within the context of ongoing and expected societal change. Decisions are taken with an awareness that conditions have changed (reactive) or are about to change (anticipatory) and that action is required to return to, maintain, or achieve a desired state.²
- 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.
- CSBs were asked about adaptation, in the context of their approach to climate action objectives, in the Q1 2024 questionnaire. The results indicate a mixed response from the CSBs in relation to adaptation, as shown below:

Snapshot of CSB adaptation measures



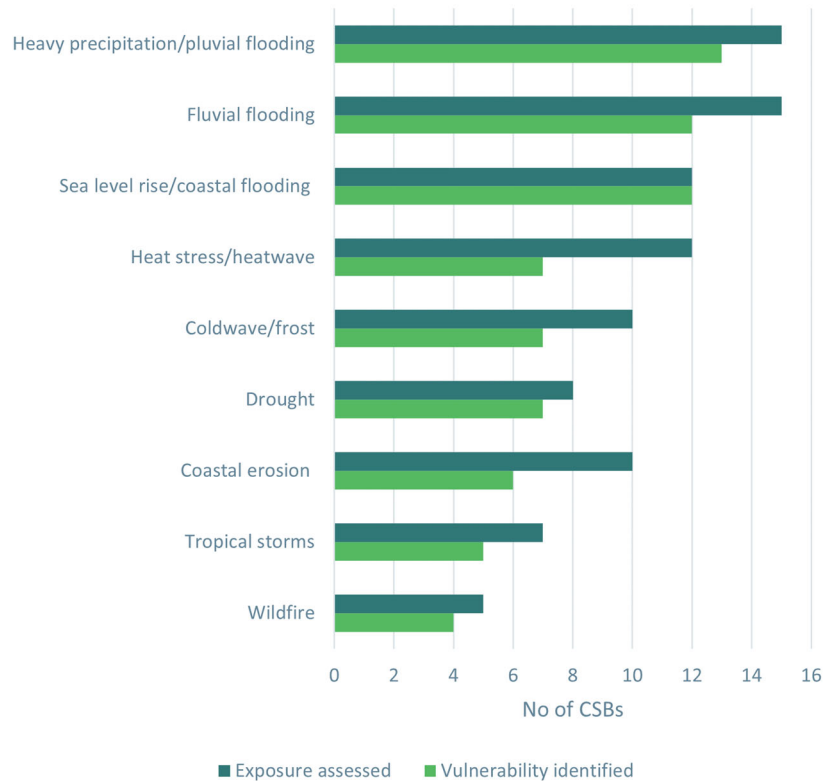
- Eight CSBs have climate action objectives related to adaptation (i.e., objectives related to adapting to the impacts or anticipated impacts of climate-related physical risks). Examples of adaptation objectives in these CSBs include:
 - Improved operation resilience, improved asset resilience (reduce the number and severity of climate related service disruptions throughout the network across assets' life cycles, enhancing service levels, reduce recovery times following climate related events);*
 - Adopt risk modelling and vulnerability assessment tools to assess climate risk of assets against impacts of coastal erosion and flooding; Collaborate with stakeholders, government departments and local authorities to plan for adaptation to coastal erosion and climate related weather conditions;*
 - Design, build, operate and maintain a water and wastewater service that is resilient to climate change;*
 - Understand, plan and mitigate the risks of climate change on port infrastructure.*
- One CSB has an Adaptation Plan that has been approved by their Board, and nine other CSBs are currently preparing an adaptation plan.

² Review of the National Adaptation Framework, 2022



- Exposure to climate hazards is being assessed by 19 CSBs and vulnerability to climate hazards has been identified in 17 CSBs. Exposure to different types of flooding is being assessed by 15 CSBs, and 13 of these have identified a vulnerability to flooding.

Climate hazard assessments by CSBs



- Of the 17 CSBs that are using climate data from official sources to assess climate-related physical risks, the most used sources of data being relied on by CSBs are: the IPCC³ (used by nine CSBs) and TRANSLATE National Climate Projections for Ireland⁴ (used by nine CSBs).

³ The IPCC is the Intergovernmental Panel on Climate Change

- There are a small number of CSBs (six) 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.



Source: Met Éireann

- A number of CSBs in the transport sector noted the work and research being undertaken by the Department of Transport Climate Adaptation Research and Energy Division.
- Some CSBs face barriers and/or challenges to considering adaptation as part of their overall climate action objectives. 10 CSBs noted a lack of resources (human or financial) as a barrier/challenge and two of these also noted a lack of understanding of what climate data is needed. Other barriers/challenges to considering adaptation that were referred to by CSBs include:
 - Primary challenge is not necessarily accessing data on climate projections but rather its interpretation and translation in actions required. Training in this area would be hugely beneficial, particularly for small-medium sized businesses who may not have that expertise available.

⁴ <https://www.met.ie/science/translate>



- *The main challenges with regard to assessing climate related physical risks is around managing competing priorities of the sustainability agenda i.e. complying with mandated targets, mandated actions and reporting.*
 - *This is an area under review and like any issue there are always challenges in terms of scarce resources and managing priorities.*
 - *Given the risks identified it is not clear that the company will face some of the risks given its business and single premises geographic location.*
- Overall, the responses from the CSBs 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; one CSB noted that it did not intend to set any new targets or take any explicit actions on climate adaptation unless required by EU (e.g., via the Corporate Sustainability Reporting Directive (CSRD)) or other domestic legislation.

Policy developments

- The draft National Adaptation Framework which was issued for public consultation⁵ in January 2024 noted that Commitment 1 and Commitment 5 of the CAF should improve CSS companies’ management, understanding and transparency of climate-related risks and associated impacts and that it may be beneficial to add adaptation as a 6th commitment to the CAF.
- On 5 June 2024, DECC published the new National Adaptation Framework⁶ which notes that periodic reviews of the CAF will be undertaken by NewERA in conjunction with DECC and the Department of Public Expenditure, National Development Plan Delivery and Reform (DPENDR), to assess whether updates are required to reflect policy and legislative developments, and the evolution of what is considered international best

⁵ <https://www.gov.ie/en/consultation/3c620-national-adaptation-framework-public-consultation/>

⁶ <https://www.gov.ie/pdf/?file=https://assets.gov.ie/295366/467c4fb1-1b5d-46be-8a96-fadde6da9324.pdf#page=null>

practice in corporates’ approach to climate action objectives. Any proposed updates to the Framework would be considered in consultation with the CSBs. The next review will include consideration of the extent to which any elements, specific to adaptation, would enhance the value of the Framework, in the context of the approach that the CSBs have taken to climate action objectives related to adaptation to date.

- The Climate Change Advisory Council (CCAC) published its Annual Report in January 2024⁷. It noted that inadequate human and financial resources for adaptation are key challenges reported by sectors and authorities. Detailed information on the budget for, and costs of, investment requirements for adaptation is lacking. Recommendations include specific funding for adaptation from relevant departments, regulators and local authorities. Investment from the private sector is essential to leverage the level of public finance available for adaptation.
- It also recommends that, to measure the mainstreaming and impact of adaptation actions, a set of national adaptation indicators be established.
- Three critical gaps for adaptation in Ireland were identified by the CCAC: adaptation finance, policy coherency and coastal managements. It commented that adaptation finance is heavily reliant on public sector funding where the investment profile is often longer and the return uncertain. Mitigation initiatives, where the risk profile and investment timelines are more certain, generally receive more private sector financing. Therefore mitigation and adaptation initiatives must be aligned now to meet increasing adaptation risks that public sector funding alone will not be able to deliver.

⁷ <https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR-2023-postfinal.pdf>



4 Monetising GHG emissions in investment decisions

- Policy guidance on investment appraisals focuses on investments over €10 million. This guidance has recently been updated (see more on this below).
- 19 CSBs have investment plans for projects over €10 million in their five year plans. Of these 19 CSBs:
 - 11 have measured the net change in tonnes of CO2 equivalent GHG emissions associated with one or more investment,
 - Six have monetised GHG emission impacts in an investment appraisal using the shadow price of carbon from the Public Spending Code (PSC) or an alternative source, and five more CSBs confirmed that they intend to monetise GHG emission impacts in future investment appraisals, and
 - The monetised value of GHG emissions has been a major factor in an investment decision in five of these CSBs to date.
- NewERA hopes to include more case studies in future reports to showcase the work being undertaken by CSBs in this area.

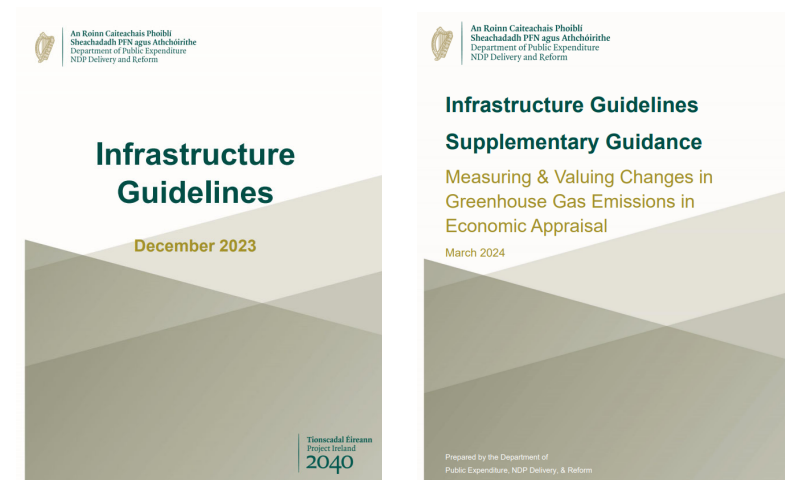
Policy Developments

- In recent months, DPENDR has published a number of updates to its policy guidance on investment appraisal, which are relevant to the CSBs and their obligations under Commitment 3 of the Framework.
- In December 2023, DPENDR published the *Infrastructure Guidelines*⁸ which set out the value for money guidelines for the evaluation, planning and management of public investment projects, including purchase or acquisitions of assets or shareholdings, in Ireland. The Guidelines replace the 2019 Public Spending Code (PSC) requirements for project appraisal.

⁸ <https://www.gov.ie/en/collection/e8040-infrastructure-guidelines/>

⁹ <https://www.gov.ie/en/collection/e8040-infrastructure-guidelines/>

- The requirements set out in the Guidelines apply to all public bodies and all bodies in receipt of Exchequer capital funding. The reference to CSBs and the applicability of the Guidelines remains unchanged from the PSC: “*In the case of Commercial State bodies not in receipt of public funding, the Board must satisfy itself annually that the Commercial State Body is in full compliance with the Code. Where the full scope of the Capital Works Management Framework does not apply to a body, the principles set out will continue to be of benefit.*”
- In March 2024, DPENDR published *Infrastructure Guidelines – Supplementary Guidance Measuring & Valuing Changes in GHG Emissions in Economic Appraisal*.⁹ This includes updated shadow price of carbon values to be applied in the monetisation of emissions associated with a project proposal within economic appraisals, which are significantly higher than previously published.
- Further information is available in the IGEEES report *Revising the shadow price of carbon used in Public Sector Economic Appraisal*¹⁰ (March 2024).



¹⁰ <https://www.gov.ie/pdf/?file=https://assets.gov.ie/286768/28af30a7-e4e3-4fb0-911f-30692615f459.pdf#page=null>

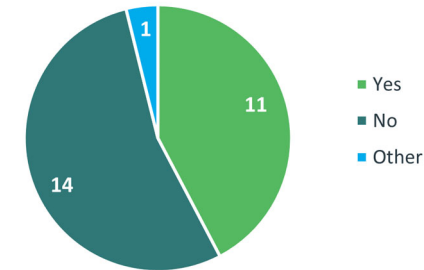


5 Circular Economy & Green Procurement

- 14 CSBs have developed a circular economy strategy, this is a decrease of one since the last update but we note that this CSB now includes circular economy and resource use in a broader sustainability plan.
- 23 CSBs have adopted circular economy initiatives (a new question). The types of circular economy initiatives that CSBs have adopted include:
 - minimising waste (22 CSBs);
 - enhancing the efficient use of resources in production/consumption (15 CSBs);
 - maintaining the value of products/materials/other resources (12 CSBs);
 - one CSB noted that some of these measures started out as initiatives some time ago, but they are now fully engrained in their day-to-day business activities, and
 - restrictions on single use items, recycling via scrappage contracts, extending the lives of assets via refurbishment, waste recovery and potable water conservation.
- 21 CSBs have incorporated green procurement principles into their procurement policies and documentation (an increase of two) and 22 CSBs intend to provide information in its annual report (or another publication) regarding its green procurement policy and/or practices (a decrease of one, as one CSB noted that their green procurement policy is less advanced than they had previously anticipated).
- A number of CSBs provided case studies of circular economy and green procurement initiatives which are presented in the following pages in the companies’ own words.

- CSBs were asked whether they track the number and value of signed contracts that incorporate green procurement criteria. 11 CSBs are tracking these details.

CSBs tracking contracts with green procurement principles



Policy developments

- DECC recently published *Buying Greener: The Green Public Procurement Strategy and Action Plan 2024-2027*¹¹ (April 2024). This Strategy aims to drive the implementation of green and circular procurement practices across the public sector. NewERA has been assigned as the lead delivery body responsible for the implementation of Action 11, which states: “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”.
- The EPA currently collects and reports information on GPP implementation across all Government Departments on an annual basis. The EPA tracks the number and value of signed contracts that incorporate green procurement criteria, over a minimum threshold, using the EPA’s priority sectors.¹² NewERA is reviewing the possibility of collecting similar information from the CSBs in future, under Commitment 4 of the CAF.

¹¹ <https://www.gov.ie/en/publication/7b1f8-green-public-procurement-strategy-and-action-plan-2024-2027/>

¹² <https://www.epa.ie/publications/circular-economy/resources/gpp-govt-dept-returns-2022.php>



Case Study



“ Drogheda Repair Shop

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 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.

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. “Fault-finding” 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



“ Cork Capwell EV Depot Redevelopment and Transition Project

The design phase of the Bus Éireann Capwell Cork EV (Electric Vehicle) transition project and garage upgrade is currently underway. This capital project presents an ideal opportunity for Bus Éireann and Irish Rail project design team to integrate circular design and construction practices into all phases of the project. In late 2023, Bus Éireann engaged Arup to support the project team through the pre design phase of the project by developing a Circular Toolkit and applying its principals specifically to the Capwell Cork EV Transition Project. This project is funded under the CIE Sustainability Fund.

Approach Taken

Bus Éireann in collaboration with Arup and the Iarnród Éireann project design team will execute a number of workshops based on the Circular Design Framework, developed by Arup and the Ellen MacArthur Foundation, the Circular Building Design Toolkit brings together strategies, case studies and tools for designing more circular buildings, meaning reduced waste and carbon for a healthier planet and healthier people. The principles of the Circular Economy have been translated into a prioritized set of strategies and actions relevant for building projects.

From these series of workshops conducted during project design phase, the team will learn why circular design principles are important, the basis of the developed framework, and how it is aligned with international policies and existing sustainability-based reporting frameworks.

Key Sustainability Outcomes for the Project

1. Pre demolition Audit: Conduct a pre-demolition audit utilising best practice guideline produced by the European Commission
2. Diverse Material Reuse: Utilise the pre demolition audit finding to find appropriate end users for reusable materials such as steel, concrete, and glass.
3. Social Value and Output: Increase the social impact of the project by including community groups and linking into local community partnerships.
4. Alignment with CSRD ESRS 5 and EU Taxonomy Criteria specifically for circular economy and climate adaptation and mitigation objectives.

Challenges & Learnings

- Key Challenges:
 - Upskilling and implementation of new concepts associated with circular practices and taxonomy criteria.
 - Project Timelines: Finding end users for materials generated by the redevelopment project within the project timeframes and within the timeframes of legal waste licencing requirements.
- Key Learnings: The approach taken undertaken to include and develop circular practices and delivery of key concepts within this project will be utilised and adopted for subsequent construction-based capital projects in Bus Éireann.

Source: Bus Éireann 



Case Study



Energy for generations

“ Supply Chain School

ESB’s Sustainability Leadership Statement commits us to, playing a full role in building a resilient electrical system, enhancing nature where we operate, empowering our people in a healthy workplace to act sustainably and working to protect the rights of all people in our value chain. In support of this objective, ESB have become a founding partner in the Irish Sustainability School. The school’s purpose is to provide a free learning platform to promote sustainability in the built environment sector. The Irish School was launched on 25th January 2024. By the end of March over 1,400 individual users and 468 companies had registered to join the School.

Approach Taken

ESB are a founding member of the Sustainability School, as such this provides us with an opportunity to collaborate with industry peers to share learnings and raise the awareness of sustainability throughout the supply chain. The success of the school will be based upon the engagement from the industry. The founding members meet on a regular basis to share experiences and learnings and to discuss new initiatives. The school hosts weekly free to access webinars covering a range of subjects from biodiversity, climate change, social value and many more ESG related topics. To support participation, we have encouraged all our suppliers to sign up, since February 2024 we have included sign-up details in all contract award letters issued by our procurement team. We regularly monitor activity and work with the school to promote a deeper level of engagement to ensure our suppliers maximise the benefits of the platform.



Challenges

As with any new initiative, the key challenge is to encourage supplier participation. Suppliers can be reticent to engage with new initiatives unless there are clear benefits. ESB’s Strategy clearly states our ambition in supporting sustainable living. This commitment demonstrates to our supply chain, the importance we place in ensuring that our suppliers promote our values and objectives which assists us in generating interest and participation in the school.

Learnings

From the initial engagement it is clear that there is a significant appetite within our supply chain for knowledge building in sustainability. ESB will continue to promote participation in the school and over the coming years we will introduce sustainable award criteria into our tenders. We believe that this will support our Sustainability ambitions and assist us in delivery our strategy.



Source: ESB



Case Study



“ Recycling at Dublin Airport Security Lanes

The point of security screening at an airport can often be a location where waste accumulates. Hand luggage restrictions and space constraints can result in low levels of recycling at this very busy point.

In 2023, a member of Dublin Airport staff calculated that recycling rates in the security lanes at Terminal 1 at Dublin Airport were less than 20%. This low recycling rate did not reflect daa’s ambition to move from pure waste management to circular principles. Circularity is one of the three driving principles that underpins our sustainability ambition and means that we have to actively rethink what we do.

Approach Taken

The Sustainability team, in association with our Sustainability Ambassadors (staff who volunteer to become change-makers, helping us develop a colleague-driven Climate Positive Culture) and security team, investigated potential solutions to drive increased recycling rates. We also engaged our waste management contractor to assist us in identifying the correct waste bins to suit the area. We communicated a new approach to waste segregation, introduced improved segregation relevant to the operation, added further labelling to the bins on site and conducted staff training. In February 2023, we implemented a month-long trial of the new waste segregation methods at one of the security lanes. The new measures included a daily briefing for the staff working in that lane and ensuring there were four different types of bins at the lane, segregating: aerosols, sharps, general waste, and recycling. Post-trial results demonstrated an increased recycling rate of over 50%. This prompted the extension of these effective procedures to all security screening lanes on a permanent basis in both Terminal 1 and Terminal 2 of Dublin Airport.

After the second month of the revised procedures, the recycling rate at Dublin Airport’s security screening had more than tripled. Our teams have maintained this significant improvement, with an annual average recycling rate of 67% from May 2023 to April 2024, including peaks of 76%.

Challenges & Learnings

Having good data enabled the problem to be identified and was the starting point for this change. Sustaining the change is directly correlated to continued commitment from our colleagues, training new team members, reinforcing the importance of this in line with our company commitments in waste, communicating regularly about the progress being made and ensuring the correct facilities are available to enable success.

The success of this initiative also highlights the value of daa’s Sustainability Ambassador programme, which educates and encourages staff from all departments and levels of the organisation to use their first-hand experience to make positive change.

Source: daa 



Case Study



Circular Economy Initiatives

An Post, as a key player in the Irish economy, is in a unique position to lead the charge in making it easier for citizens to return, repair, reuse, repurpose, resell and recycle items through the postal system. Using our wide-reaching network, we are not only driving change within our own operations, but also across Ireland.

Approach taken - Operations

We began our Circular Economy journey by reducing and separating waste, minimising the use of paper and reducing packaging waste. This year we moved to our new headquarters, the EXO building on Dublin's North Wall Quay, just a stone's throw from the Port of Dublin and IFSC (financial district) where Ireland trades and transacts with the rest of the world. Our waste management system in the EXO building meets best practice standards in environmental compliance and is certified to ISO 14001 (environmental management) standard. The transition to the EXO also included the distribution of bamboo-made keep cups to all 1,140 employees situated there. Keep Cups were also introduced in our largest mail centre, saving over 78,000 cups per year going to waste.

The building move brought with it an opportunity to explore how to upcycle our end-of-life equipment and unclaimed belongings. We worked with a specialised asset management company and resource redistribution network, which provided us with a platform to facilitate the advertisement of any unwanted items (furniture and other offices furnishings). These items were then redistributed to schools, businesses and charities across Ireland, avoiding over 2,500kg of CO2 emissions.

To ensure the responsible and sustainable disposal of end-of-life IT assets, whilst also maximising the value of those assets, all of our old IT equipment and hardware has been upcycled, or recycled if that is not possible. This initiative has resulted in over 14,500kg of electronic goods being upcycled, with over 245 individual items being recycled, repurposed and resold, which equates to over 2.6 tonnes in avoided CO2 emissions.

Finally, we maintained our zero waste to landfill policy for the 6th consecutive year and have added new ways to re-introduce our waste into the Circular Economy through our biodigester. We donate our surplus compost generated by the biodigester to other users around the country, and have upskilled our catering management company as well as our own employees on the correct usage of it.

Approach taken - Products and services

We promote circularity by providing pre-paid gifting boxes made from 93% recycled material and pre-paid packaging bags made from 40% recycled materials, all certified as 100% recyclable. Additionally, by using carbon-balanced paper for our prepaid boxes, we are cutting down on emissions during production too.

We also offer favourable terms for lighter and smaller parcels, benefitting both senders and recipients. This approach not only streamlines our operations but also minimises the amount of packaging waste that needs to be recycled, contributing to a cleaner, more sustainable environment for households and businesses alike.

Challenges & Learnings

Through the challenges that arose from our Circular Economy initiatives, we have accumulated a number of learnings.

Businesses have a vital responsibility to create opportunities to make circular living more accessible for people across Ireland. Just as important is the involvement of communities across the country. Greater participation in Circular Economy platforms, so that there is a wider audience, would enhance the success of upcycling, as some items have been easier to redistribute than others. The greater demand in the Irish market, the greater the opportunity for more and better solutions to become available.

In An Post, we are committed to becoming even more circular within our operations and provide more opportunities to make circular living more accessible for people across Ireland, through our products and services.



Source: An Post



Case Study



“ Vehicle cleaning and related services

Bus Éireann outsource the services of cleaning vehicles. Bus Éireann requires the provision of cleaning services for vehicles at all locations. The value of the contract over 5 years is approx. €20m. The contract was awarded in 2023.

Market dialogue was carried out to ensure that sustainable product was in the market. EPA guidelines were used to set award criteria. Specification included sustainability as follows:

- Training of staff need further training in sustainability, waste segregation to ensure they understand the importance of waste segregation and how to do it effectively
- All staff engaged in the provision of the services must be trained in segregation of waste and comply with BE sustainability policy
- Products used are to be sustainable and eco-friendly
- Sustainability policy and signed commitment to support BE to achieve their sustainability goals
- The contractor must also outline or provide a copy of their current sustainability plan/ strategy.

GPP criteria was as follows:

- Environmental Management System
- Use of Eco-Labels
- Use of concentrated undiluted cleaning products
- Use of microfiber products
- Waste Segregation and Disposal

Audits are carried out on site visits by our Contracts and Sustainability Managers to ensure that products are being used and recycling is being adhered to. Please see below information on CO2 savings from moving to compact, controlled use chemical bottles.

Office cleaning and related services

Bus Éireann outsource the services of office cleaning. This tender process included cleaning services and related consumables required to carry out this service. BÉ was aware that this contract could have an impact on the environment using eco-label cleaning products and equipment and ensure waste segregation. The value of the contract over 5 years is approx. €5m. Contract was awarded in 2021.

Market dialogue was carried out to ensure that sustainable product was in the market. EPA guidelines were used to set award criteria

- All cleaning consumables are eco-friendly, and cleaning equipment is reusable and durable.
- The products used by our cleaning contractor are eco-friendly plant based and fully biodegradable and contain no artificial compounds meaning there is no need for gloves or goggles.
- They use smart dosing technology in order to reduce single use plastics. A 1.4 litre smart dose product typically equates to 280 ready to use 750 ml plastic trigger bottles resulting in significant savings of chemical, plastic packaging and CO2.

Audits are carried out on site visits by our Contracts and Sustainability Managers to ensure that products are being used and recycling is being adhered to.

Source: Bus Éireann 



Case Study



“ Incorporation of Sustainability Criteria into Procurement Contracts

The incorporation of sustainability green procurement award criteria in its strategic contracts, is a key enabler to ensure that Gas Networks Ireland (GNI) meets its supply chain sustainability objectives. A key challenge is the transposition of GNIs strategic sustainability objectives into tangible requirements within contracts. To achieve this, GNI completed a Sustainability Risk & Opportunities (Heatmapping) process of future tender and contract plans.

Sustainability Risk & Opportunities (Heatmapping) Process

A sustainable procurement tender plan heatmap is a visual representation of future contract and green procurement requirements. The heatmap reveals areas of sustainability risks, impacts and opportunities enabling management to make informed decisions as to the appropriate criteria to include in the award and evaluation of potential contract awards.

The heatmapping process collects data from various sources including market analysis intelligence, internal specification requirements and business subject matter experts in the areas of sustainability, supply chain, engineering and operations and supplier sources such as supplier capability and performance metrics.

By visually representing green procurement data in this way, GNI gains valuable insights into where resources should be focused. With the heatmap, we can pinpoint high impact sustainability areas which allows us to better leverage contracts with suppliers resulting in improved efficiencies and sustainable improvements.

One major advantage of using a heat map is its ability to identify sustainability and green procurement patterns and trends across categories of spend.

By colour coding data points based on their score values, high impact contracts can be identified allowing us to focus attention where it is needed most.


A significant advantage is that heatmaps make it easier to communicate complex information effectively. The visual nature of these maps allows business stakeholders at all levels to understand the sustainable data at a glance without needing extensive analysis or technical expertise. This enhances collaboration between different departments within GNI and ensures everyone has access to critical information for decision-making purposes.

The heatmapping process covers a 12-month yearly plan of forthcoming contract tenders and also includes a number of category specific workshops focused on identifying the highest sustainability impacts and opportunities in our key strategic tenders and contracts.

Outputs from this process include:

- Identification of High Sustainability Impact Tenders,
- Green Procurement Assessment for each High Value contract,
- Sustainability Questions and Criteria for each contract.

Conclusion

GNI has used the visual heat maps to gain valuable insights into their green procurement process. By identifying areas for sustainability improvement and green procurement opportunities through data visualization techniques like heat mapping, has enabled us to optimize green procurement opportunities in our contracts and supply chain. 

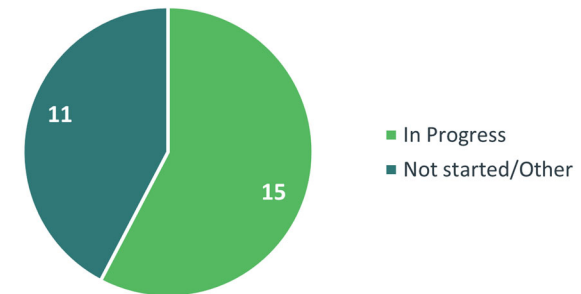
Source: Gas Networks Ireland



6 Climate-related Disclosures - CSRD & EU Taxonomy

- Ireland and other Member States have until mid-2024 to transpose the CSRD.¹³ Mandatory requirements are expected to commence for financial years on or after:
 - 1 January 2024 for public interest entities in scope of EU non-financial reporting rules (greater than 500 employees),
 - 1 January 2025 for other larger companies and public interest entities (greater than 250 employees), and
 - 1 January 2026 for listed SMEs, with an ‘opt out’ possible until 2028.
- It is expected that most CSBs will be subject to the CSRD. A clearer picture on this will emerge following the transposition of the Directive.
- Undertaking a double materiality assessment (DMA) is an important first step for CSRD. While none of the 26 CSBs have yet completed a DMA, 15 CSBs are currently in the process of preparing one. 11 CSBs have yet to start preparing for a DMA.

CSBs preparing Double Materiality Assessments



- 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).
- In terms of preparing Taxonomy disclosures,
 - Three CSBs have already published disclosures¹⁴, and
 - Seven CSBs are currently preparing disclosures.
- There are a number of CSBs already making disclosures under climate-related reporting frameworks such as TCFD, GRI, and CDP:
 - Nine CSBs currently report under one or more of these frameworks, of which seven CSBs report under two frameworks, two CSBs report under one of these frameworks and one CSB reports under all three frameworks.
 - Two more CSBs plan to report under one of these frameworks.
 - 11 CSBs are not planning to report under TCFD, GRI or CDP and the remaining four CSBs say it is under review.

¹³ <https://enterprise.gov.ie/en/what-we-do/the-business-environment/corporate-sustainability-reporting/>

¹⁴ <https://www.ervia.ie/docs/annual-reports/22072-GNI-Directors-Report.pdf>

https://cdn.esb.ie/media/docs/default-source/sustainability/22118-esb-sustainability-report-ye22v6.pdf?sfvrsn=213694f8_3

<https://www.bordnamona.ie/legal-requirements/>



- In November 2021, the International Financial Reporting Standards (IFRS) Foundation announced the formation of the International Sustainability Standards Board (ISSB), to develop standards that aim to create a global baseline for consistent sustainability-related disclosures for companies to report in tandem with their financial statements. In June 2023, the ISSB published its first two standards (S1 and S2). The Financial Stability Board (FSB) has officially transferred responsibility for monitoring companies' climate-related financial disclosures from the TCFD to the IFRS following the release of the 2023 TCFD Status Report in October 2023 under the IFRS S1&S2.
- Five CSBs have or are preparing Science Based Targets. Science-based targets provide companies with a clearly-defined path to reduce emissions in line with the Paris Agreement goals and are monitored by the Science Based Targets initiative (SBTi).
- Overall 15 CSBs are currently preparing a DMA, and nine of these are already reporting under one or more climate-related disclosure frameworks. It is encouraging to see this work is underway. However, as at 31 December 2023, 11 CSBs were at a very early stage of preparations for CSRD as they had not commenced work on a DMA and more than half of these CSBs were not aware of any current or future requirements under EU Taxonomy.



Appendix A: Important Information

This document (the “Document”) has been prepared by the New Economy and Recovery Authority (“NewERA”) for DECC in relation to the Framework, for the purpose of providing an update on the implementation of the Framework within the commercial semi-State sector, as reported to NewERA by the individual CSBs in Q1 2024.

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

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