

IRISH GREEN BUILDING COUNCIL'S SUBMISSION – UPDATE TO CLIMATE ACTION PLAN

ABOUT THE IRISH GREEN BUILDING COUNCIL

The Irish Green Building Council (IGBC) provides **leadership for a sustainable built environment**. The IGBC is a registered **charity with over 480 corporate members drawn from all parts of the value chain**, from occupiers, design professionals, contractors, suppliers, academics and public authorities, and is affiliated with a global network of 70 national councils within the World Green Building Council. This allows us to create workable solutions and tools to deliver transformative change towards a sustainable built environment. The Irish Green Building Council is also the national partner of the Renovate Europe campaign in Ireland. Renovate Europe is the only EU-wide campaign focusing exclusively on ambitious renovation of the building stock in the EU and is the voice for energy-efficient renovations, taking a technology neutral, integrated, and holistic approach to energy efficient renovation.

The Irish Green Building Council is looking to transform the Irish industry to sustainable practices through policy creation, education and the provision of tools to measure and accelerate progress.

ABOUT THIS SUBMISSION

The Irish Green Building Council welcomes the opportunity to contribute to the update of the Climate Action Plan 2026. **This submission focuses on the built environment, while recognising its strong links with transport, industry, agriculture and energy.** It draws on the IGBC's recent research, project work and engagement with members and stakeholders across the value chain, including dedicated workshops on climate action and the decarbonisation of the built environment.

While recent emissions projections suggest Ireland may be close to achieving its first carbon budget, a number of independent assessments highlight **that Ireland remains significantly off track to meet its longer-term climate targets**. This challenge is particularly **acute in the built environment**, where delivery and implementation continue to lag behind policy ambition. The *Climate Action Plan Q1 & Q2 2026 Progress Report on Legacy Actions* shows that key actions in the buildings sector remain delayed, while the **pace of energy renovation, compact growth, circularity and low-carbon construction must accelerate substantially if Ireland is to achieve its emissions reduction commitments**

Ireland has established a reputation as a leader in energy renovation programmes in Europe. However, maintaining that position now requires a stronger focus on implementation, delivery at scale and measurable outcomes, and a broader approach to sustainability in the built environment (not limited to energy efficiency). Climate Action Plan 2026 must therefore **prioritise actions that provide certainty, accelerate delivery and support a genuinely integrated approach to decarbonising the built environment**.

Key recommendations:

- Accelerate delivery of existing climate and building decarbonisation measures.
- Publish key delayed plans and roadmaps, including the National Building Renovation Plan and Circular Economy Roadmap for Construction.
- Provide greater certainty on the implementation of all articles of the Energy Performance of Buildings Directive (EPBD).
- Better integrate housing, transport and planning policies to support compact growth and reduce emissions cost-effectively.
- Increase support for energy renovation, adaptive reuse, and the regeneration of vacant and derelict buildings.

- Scale up green public procurement and support for low-carbon, circular and biobased construction materials.
- Support a just transition through targeted renovation supports, skills development and workforce upskilling.
- Strengthen climate adaptation measures and resilience across new and existing buildings.

Q1. In Ireland's Greenhouse Gas Emissions Projections 2025-2030, the EPA now projects for the first time that we are close to meeting our first carbon budget, following a consistent trend of improving projections for that budget over recent years. In your view, which policies and measures have been the most successful in reducing Ireland's GHG emissions?

- Although it is still early to assess the full impact, the **development of a comprehensive national renovation strategy** and programme has been a positive step. This includes:
 - Expanded grant supports for homeowners and social housing providers as well as for SMEs.
 - Technical support through a robust network of one-stop-shops.
 - Greater public awareness of the importance of renovation across society
 - Investment in upskilling and training (e.g. NZEB/Retrofit centres of excellence) but needs to be ramped up, including through greater incentives to upskills – e.g., through the introduction of a sustainability pass.
- There has also been good policy progress on green public procurement alongside more recent but smaller progress on vacancy and dereliction*, and the use of timber in construction. The priority now is to **ramp up**

implementation and delivery of these measures, ensuring that policy translates into action and emissions reductions on the ground.

*This is key as the embodied carbon emissions associated with a deep residential retrofit is approximately a quarter of those of a new build – not even considering the embodied carbon emissions associated with infrastructure required.

Q2. Among the measures identified in Climate Action Plan 2024 and Climate Action Plan 2025, which do you consider the highest priority to close the gap to 2030?

- The most cost-effective and efficient way to reduce our carbon emissions is to approach our policy solutions holistically, i.e., through better coordination and integration of policies, regulations and programmes.
- **Transport:** A robust implementation of the new strategy *Moving Together – A Collaborative Approach to Systems Change in Transport 2026–2030* should be a key priority, alongside stronger integration with housing and compact growth to ensure new development is well connected to public transport and active travel and supports a shift away from car dependency.
- **Buildings:**
 - **Prioritise the full transposition and implementation of the EOBd 2024:** Under the Energy Performance of Buildings Directive (EPBD), Ireland must measure and disclose the life-cycle emissions of all buildings from 2030, while **Minimum Energy Performance Standards will affect existing non-residential buildings**. Many organisations within the industry are already well advanced in this field and support an earlier timetable. Uncertainty and

lack of communication delays action and weakens the prioritisation of life-cycle emissions reduction, and capacity building within the industry.

Furthermore, it is crucial that **Ireland's National Building Renovation Plan** be published following a public consultation. Ireland has already missed the deadline to submit its draft plan in December 2025, so it is therefore imperative that the public consultation opens as soon as possible and that stakeholders can contribute to the development of an ambitious, implementable strategy.

- The **publication of a roadmap for phasing out fossil fuel boilers in existing buildings** should also be treated as a priority to provide certainty to industry and everyone in society. It is an outstanding action of the Climate Action Plan 2025, and a requirement of Article 13 of the EPBD.
- **Renewable Heat:** Accelerate the deployment of the existing capital grant earmarked for district heating projects and provide additional funding to support the build out of the first wave of projects.
- **Vacancy & Dereliction:** Invest in ambitious regeneration policies to address vacancy and dereliction in our towns and cities. Tackling vacancy and dereliction is a way to simultaneously address the embodied carbon emissions of buildings, transport and industry. Please see recommendations of the Vacant to Vibrant Building Alliance for further information at www.igbc.ie.

- **Industry:**

- Green public procurement (GPP) could be a powerful tool for stimulating decarbonisation and innovation, but its application remains weak and inconsistent. Government needs to lead by example and accelerate the implementation and enforcement of national GPP procurement criteria for public buildings.

- Publish the delayed report from **Carbon Capture Utilisation and Storage (CCUS) Taskforce** to assess its market readiness and further policy development in this field.
- **Develop and implement a Circular Economy Roadmap for the Construction Sector**, as a matter of urgency as the industry needs clear targets.
- **Public sector leading by example:** In relation to GPP, while the development of ambitious strategies is positive, there is a need to upskill public bodies in that field and to develop practical guidance as well as standardised procurement templates to ensure consistent application of GPP requirements.
 - We also recommend developing and implementing the OPW programme for the retrofit of publicly owned traditional and historic buildings. The public sector needs to set a precedent by leading in this area and help to build capacity in the industry to deliver the renovation of these projects across the board – this type of buildings accounts for 18% of Ireland’s building stock.
 - Publish and implement the **Public Sector’s 2024 and 2025 Building Decarbonisation Roadmaps**.

Q3. In the key sectoral areas identified (Electricity, Transport, Industry, Buildings, Agriculture and Land Use), what additional actions to those already in CAP 24 and CAP 25 could, in your view, accelerate delivery in these areas?

Cross-cutting actions

Climate action across these sectors should not be approached in silos. Many of the challenges and opportunities are interconnected and require a more joined-up approach across Government and policy areas. This is also the most cost-effective way to reduce our emissions. In this context, **recent discussions around disapplying Section 15 of the**

Climate Action and Low Carbon Development Act 2021 for infrastructure projects is particularly concerning.

To support the integrated decarbonisation of the built environment, the following actions should be prioritised:

- Tackle vacancy and dereliction as a way to simultaneously address the embodied carbon emissions of buildings, transport and industry.
- Publish and implement the **Public Sector's 2024 and 2025 Building Decarbonisation Roadmaps.**
- **Develop and implement a Circular Economy Roadmap for the Construction Sector**, as a matter of urgency as the industry needs clear targets.

Transport

The Transport sector in Ireland accounted for 21.8% of total national emissions in 2024. With 300,000 homes to be delivered by 2030, ensuring all new homes (and not only the ones delivered by the LDA – TR/24/8) are delivered in walkable areas with good access to public transport and car-sharing schemes must be an absolute priority. The updated National Development Plan emphasises the need for a transport-led approach to housing development, allowing for the emergence of sustainable and well-connected communities where active is feasible and attractive for many localised journeys and good quality public transport is available to facilitate longer journeys into major urban centres. It is also relevant in this context, to push for the reuse of existing buildings and activation of derelict sites as these buildings are often well located and are connected to the basic level infrastructure needed. The publication of the 'Moving Together Strategy' this year, which was one the ten actions in the 2025 Climate Action Plan is positive but there is concern to whether this strategy is being implemented on the ground.

The increasing density would facilitate a more effective use of both existing and any new transport infrastructure and contribute to a reduction in transport emissions. However, current national scale measures are ineffective policy instruments for implementing compact growth. There are substantial differences in the percentage of new dwelling completions by region and settlement size. Aggregating these differences at the national level, or across settlement categories, conceals more localised disparities. Furthermore, the government's recent sign off on is one-off rural and Gaeltacht housing draft guidelines and the renewed focus in general on one-off housing in the programme for government is particularly concerning. We should be making it easier to meet our compact growth objectives instead of making the planning parameters looser. A holistic and integrated approach is the most cost-effective way to deliver the homes, and infrastructure Ireland needs while also meeting its climate targets.

With that regard, it is also disquieting that much of the focus on decarbonising the transport industry remain on electric vehicles when the focus should be on decentring cars from the built environment. Maximum car parking limits should apply across all local authorities (urban and rural) to ensure all new developments are walkable and enable a low carbon lifestyle. Car orientated development with dedicated car spaces per unit directly connected to the unit should not be permitted - except in exceptional circumstances, such as disabled spaces. The priority should be to take more space away from cars to provide space for high-quality public transport, active travel, and green infrastructures. This is important for climate mitigation and adaptation, and would improve people's health and wellbeing, also making our urban areas more attractive places to live in.

Industry

The IGBC welcomes the stronger focus on reducing embodied carbon in the construction sector. However, decarbonisation should not focus solely on modern methods of

construction (MMC), reducing concrete use or carbon capture, utilisation and storage (CCUS). The priority should be to accelerate the development and uptake of all low-embodied-carbon solutions, including circular, biobased and innovative construction materials – as well as to support an ambitious and early implementation of the EPBD requirements in relation to the measurement of buildings’ full life cycle potential.

While optimised design and MMC can reduce material use and associated emissions, they form only part of the solution. Climate Action Plan 2026 should support a broader range of low-carbon construction approaches by stimulating both supply and demand. Ireland, with its strong agricultural and forestry sectors, is particularly well placed to develop local biobased construction value chains that can reduce emissions while supporting rural economic development.

A key priority should be the publication and implementation of the Circularity in Construction Sector Roadmap. Increasing material efficiency, extending building lifespans, supporting renovation and adaptive reuse, and designing for adaptability, deconstruction and material recovery can significantly reduce embodied carbon while lowering resource consumption and waste generation. The roadmap should provide a clear framework for scaling circular construction practices across the sector and should be supported by measurable targets and actions.

The publication of the Timber in Construction Steering Group's Final Report and Recommendations is a positive step. Government should now prioritise investment in implementing these recommendations, including any necessary regulatory amendments and market supports. A similar coordinated approach should also be considered for other biobased construction materials. Targeted support for research, pilot projects, manufacturing capacity and market development could help establish domestic supply chains for materials such as hemp, sheep's wool, straw and other agricultural fibres, while creating economic opportunities in rural areas.

The recent public consultation on the amendments to Part D of the regulations and technical guidance document, present an opportunity to ensure that it continues to fulfil its core function of ensuring products are fit for purpose and safe, while also enabling innovation and supporting the transition to lower-carbon construction solutions, hence contributing to Ireland's climate targets.

A key legacy action for industry, to publish a report on the work of **the Carbon Capture Utilisation and Storage (CCUS) Taskforce**, has been delayed. The progress report notes this delay, with the Taskforce report originally due by the end of Q4 2025. Given the significant role CCUS is expected to play in reducing emissions from hard-to-abate industrial processes, it is important that this work is completed and that the report provides a clear basis for further action. However, CCUS remains an unproven technology as of 2026 and won't be sufficient on its own. The key component of cement, which is produced in a carbon intensive process, is the clinker. Substitution with zero carbon fuels can only reduce up to 40% of these emissions. While the previous climate action plan mentions that Government will work with industry to support innovation in this sector (clinker reduction and replacement), it's important to include a specific action associated with this objective in the climate action plan 2026. Further support (e.g., through Enterprise Ireland) is also needed to encourage companies to undertake high-risk research and development in relation to novel cementitious materials; innovative products; and more efficient production technologies. While CCSS is part of the solution, government should also work with industry to support innovation in this sector and alternative renewables like geothermal and wastewater heat recovery.

The increased emphasis on Green Public Procurement (GPP) is particularly welcome. Public procurement can play a critical role in creating demand for low-carbon, circular and biobased construction materials and in accelerating the delivery of circular economy objectives. To maximise its impact, GPP requirements should be consistently applied across all publicly funded construction projects, including social housing. In particular,

public bodies should be required to implement the Level(s) indicators relating to whole-life carbon, adaptability and renovation, and design for deconstruction, reuse and recycling.

Since September 2025, public bodies have been required to undertake whole-life carbon assessments for directly procured or supported construction projects, while reporting obligations relating to Green Public Procurement have also been strengthened. However, feedback from IGBC members indicates that implementation remains inconsistent in practice, particularly in relation to whole-life carbon assessments and the application of relevant Level(s) indicators. Mechanisms for sharing best practice across public authorities would also be beneficial. Stronger oversight, additional training and standardised procurement templates are therefore needed to ensure that existing commitments translate into meaningful market transformation.

Buildings

As reported by the Climate Change Advisory Council's annual review of the Built Environment 2026, Ireland is not on track to meet its targets within its second sectoral emissions ceiling (2022 – 2030). Significant acceleration of planned policy is needed, if this projected trend is to be reduced. This includes an ambitious and timely implementation of the Energy Performance of Buildings Directive.

Embodied carbon emissions

One of the key actions in the 2025 Climate Action Plan was to 'Develop embodied carbon methodology and establish structures in line with Energy Performance of Buildings Directive to reduce carbon in construction materials for all new buildings' (BE/25/1). While significant progress has been made in this field, early communication and engagement in relation to the development of the roadmap to be published in January 2027, and the introduction of targets is needed. As seen in other European jurisdictions which have already introduced

regulation and targets – e.g., Denmark and France, these actions are key in securing robust data, and in giving industry confidence to invest and innovate.

Residential

Financial supports for energy renovation should be regularly reviewed to ensure they reach the most vulnerable households in society as required under the latest EPBD. While the 2026 National Residential Retrofit Plan has made positive progress, including increased funding for local authorities and Approved Housing Bodies, private renters and households just above current eligibility thresholds for free energy upgrade remain largely excluded.

Government should introduce a sliding scale of grant support based on household income, ensuring that support gradually reduces as household income increases rather than stopping at a fixed eligibility threshold. This approach, used in France and the Netherlands, could help households just above the current threshold to undertake much-needed energy upgrades. Other approaches, such as equity release schemes could also be explored to support households that are asset-rich but cash-constrained. These measures would help ensure that the benefits of energy renovation are more equitably distributed and support the EPBD's objective of prioritising vulnerable households and those experiencing energy poverty.

Independent advice should also be strengthened to help all households navigate renovation, in line with **Article 18 of the EPBD**. The Community Energy Project Coordinator approach with its strong local anchor should be expanded, alongside the rollout of **Renovation Passports under Article 12** – that are key in supporting high-quality staged renovation, and stronger quality assurance for existing one-stop shops to support high-quality renovation and consumer protection.

Commercial and Public Sector

Ireland has a target of reducing greenhouse gas emissions from commercial and public services buildings by 45% by 2030. However, according to the EPA's latest's [Greenhouse Gas Emissions Projections \(2025 to 2030\)](#), emissions from this sector are on track to increase by 6.8% from 2018 to 2030 under the 'With Existing Measures' scenario.

[Leading Irish building owners and investors indicate](#) that lack of metred energy data for commercial buildings is a barrier to decarbonisation. Minimum Energy Performance Standards (MEPSs) can also be [more effectively designed and implemented](#) with better data on metred energy use.

There are various ways that the wider dissemination of metred energy data for non-domestic buildings could be supported. These include stronger integration of metred energy data into BERs, the development of frameworks that allow building owners to log and benchmark metred energy data (e.g. NABERS in Australia, OPERAT in France, Energy Star in the US), or the wider use and enforcement of Display of Energy Certificates, which do benchmark metred energy use (however, according to IGBC research and stakeholder engagement, the DEC methodology is outdated and requires revision).

Improving Business Support Schemes

There is broad recognition that organisations such as SEAI, Enterprise Ireland (EI) and IDA Ireland provide valuable support to businesses undertaking energy efficiency and decarbonisation measures. However, businesses often find the landscape difficult to navigate due to poor coordination and limited integration between the various schemes and support mechanisms. Level of awareness of these schemes across the industry is also highly uneven.

Greater alignment and communication across these programmes would improve accessibility and uptake. Consideration should also be given to introducing a requirement

for post-retrofit BER assessments within SEAI business grant schemes, similar to the approach used in the residential sector, to improve verification of outcomes.

Additional support is also needed for the development of Environmental Product Declarations (EPDs), which remain costly for many companies, particularly SMEs.

Environmental Product Declarations and the Construction Products

Regulation

There remains uncertainty within the sector regarding the role of Environmental Product Declarations in demonstrating the carbon impact of construction products. Some stakeholders continue to receive the message that EPDs alone are insufficient and that companies should wait for the development of a future EU-wide methodology under the Construction Products Regulation (CPR). This message is not aligned with the communications from the European Commission, and this uncertainty risks slowing progress and investment. At the same time, access to financial support for producing EPDs should be clarified, as cost remains a significant barrier for many smaller manufacturers.

Agriculture

The IGBC welcomes the focus on the bioeconomy and the opportunities it can provide for diversification in agriculture. We suggest reading this submission alongside our submission to the consultation on the draft *Bioeconomy Strategy 2026–2030* – also available at www.igbc.ie. In relation to construction, however, it's now time to look beyond timber and afforestation and support a wider range of bio-based materials.

Developing a bio-based construction industry will require greater support for farmers and foresters to produce a diverse range of materials, including CLT, sheep's wool, hemp, mycelium, straw and other agricultural fibres. Government should immediately fund the implementation of the recommendations of the **Timber in Construction Steering Group** and use a similar approach to explore other materials through dedicated steering groups.

Strategic investment in production facilities, research, skills and supply chains will be needed to overcome barriers such as licensing, processing capacity and fire testing, while creating opportunities for rural economic diversification and new export-oriented industries.

As more countries introduce embodied carbon requirements in the built environment – a requirement under the latest EPBD, developing these industries would also support Ireland’s competitiveness and contribute to reducing emissions from both agriculture and construction. A more diverse approach to bio-based materials could provide farmers with additional opportunities for diversification while reducing reliance on more carbon-intensive construction materials.

Timber

The Timber in Construction Steering Group has published its Final Report and Recommendations, outlining priority actions to accelerate the safe and scalable adoption of timber in construction across Ireland. Government should now ensure these recommendations are implemented and demonstrate leadership by requiring public bodies to assess timber as a primary structural material at design stage and use timber solutions where viable. **Investment in timber industry is therefore crucial at this point.**

Q4. In addition to the priority areas, you have already identified in previous questions, which other areas should this update to the Climate Action Plan focus on?

Government leading by

- **Where government invests in buildings, including housing, through grant aid, tax incentives or procurement from private sector,** ensure that these developments adhere to higher sustainability requirements, to support the development of low carbon, resilient homes and neighbourhoods, while building capacity within the

industry. This could be achieved through **a full alignment with the EU taxonomy requirements ([Level\(s\)](#)), or green building certifications such as the [Home Performance Index](#) or equivalent** - which all include requirements on whole life carbon, water and resource efficiency, as well as biodiversity. This approach is already taken **in Germany for all KfW funded projects**, and could first be piloted on a programme where subsidies are significant, such as Croí Cónaithe (Cities) Scheme.

- **Weak enforcement** remains a significant challenge across the sector. Existing regulations are often not being adequately monitored or enforced, undermining both policy objectives and market confidence.
- Examples include limited checking of **Display Energy Certificates (DECs), Building Management Systems (BMSs)** and other operational requirements through **building control processes**. Stronger compliance monitoring and enforcement mechanisms are needed to ensure regulations deliver their intended outcomes.

Biodiversity

- **Invest in the development and implementation of a coordinated national strategy on biodiversity and planning for the built environment**, centred around the mitigation hierarchy to reduce legal uncertainty and deliver on our housing and environmental targets., Strategy to include the development of:
 - a. **Evidence-based ecological mapping at local authority level,**
 - b. **A standardized biodiversity metric tool** for sites zoned for development,
 - c. **A standardised toolkit, guidance documents, and templates to inform master planning and site layouts.**
- **Improve funding for urban greening and nature-based solutions as part of public infrastructure schemes** to enhance their quality and extent, building upon recent funding announced for local authorities for [nature-based solutions](#) to be used in the public realm.

Vacancy & Dereliction

- Revitalising vacant and derelict properties through high-quality renovations and adaptations presents a unique opportunity to address the housing shortage while simultaneously reducing carbon emissions. The [Vacant to Vibrant Building Alliance](#) (VVBA) recommends these key actions – See www.igbc.ie for more information:
 - Fund the Recruitment of Five Adaptive Reuse Regional Coordinators
 - Review and Expand Croí Cónaithe Initiatives to Better Support Adaptive Reuse.
 - Introduce Targeted Tax Measures for Adaptive Reuse
 - Develop Technical Guidance Documents (TGDs) for Adaptive Reuse.

Read to full report of recommendations [here](#).

Low Carbon technologies and material supply chains

- **Introduce a multi-annual fund (€30 million per annum) open to all three parts of supply/production/demand stakeholders** to kickstart support for farmers, the development of production of low-carbon materials, and re-use facilities, as well as the development of pilot projects to build capacity in the industry.
- **Allocate funding to support the development of the proposed Building Standards Regulatory Authority – Recommendation 8.3 of the Housing Plan 2025-2030, ensuring collaboration with industry and other relevant bodies to improve consistency in the implementation of building regulations across the country and accelerate adaptive reuse and the use of innovative, low-carbon technologies.**

Water Efficiency

- Introduce Water efficiency requirements for new builds as a high-impact, low-cost measure that can deliver across multiple policy priorities including water conservation, reduction of carbon emissions and housing delivery.

Circularity

The publication of the *‘Whole of Government Circular Economy Roadmap Strategy 2026 – 2028 Accelerating Action’* in February 2026 is welcome. However, we are still waiting on the publication of the *‘Circularity Roadmap for the Construction Sector’* which is required under the *Circular Economy and Miscellaneous Provisions Act 2022*. A clear timeline for its publication and implementation is needed to provide industry with the certainty required to invest and accelerate the development of a circular construction sector.

IGBC’s [*Building a Circular Ireland roadmap \(2025 – 2040\)*](#) was published in 2025 and includes a number of key objectives and targets that Ireland should be striving to meet between now and 2040, including:

- Set conditions, such as tax depreciation and free take-back, to allow second-life products/ remanufactured/ refurbished to have a final cost equal to or lower than new equipment.
- Introduce financial support through grants and/or tax credits for innovative low-carbon materials, re-used materials, as well as buildings built in mass timber or designed for circularity.
- Extended Producer Responsibility schemes in place for a variety of construction materials.
- Digital solutions starting to enable traceability of components and materials, facilitating adaptation, repair, deconstruction and reuse.
- **More specifically, scale up funding for demonstrator projects of innovative low-carbon and sustainable technologies.** E.g., projects using measurable low-carbon construction technologies and projects enhancing biodiversity. This would provide useful data and contribute to building capacity in industry.

- Introduce financial support through grants and/or tax credits for innovative low-carbon materials, re-used materials, as well as buildings built in mass timber or designed for circularity.

Q5. The Joint Oireachtas Committee on Climate, Environment and Energy published a Report on Barriers to Achieving Climate Targets (2026-30) in February. Do you agree with the findings of this Report? What other barriers to achieving the climate targets, if any, would you identify? How best can the identified barriers be addressed?

Overall, the IGBC agrees with findings of the report, specifically barriers:

- **23. 'Fragmented policy landscape, lacking a clear and strategic vision for energy transition, with insufficient efforts to achieve a just transition leading to disproportionate burdens being placed on low- and middle-income households and SMES':** IGBC strongly supports addressing this barrier, specifically the lack of joint up thinking evident across the policy spectrum with transport (compact growth and regeneration) being a key one as well as agriculture (biobased materials). On just transition, see our response to the next questions
- **27. Failure to maximise reuse of vacant and derelict buildings with embodied carbon due to cumbersome regulation and lack of financial support for building owners to cover upfront costs. Absence of measurements of emissions associated with the demolition of derelict buildings or measures to disincentivise demolition in favour of refurbishment:**
 - Renovating Ireland's vacant and derelict properties, including above the shop, is key in reducing our carbon emissions. Specific recommendations on this point have been developed by the IGBC, through a cross-disciplinary alliance: [Vacant to Vibrant Building Alliance](#).

- **28. Slow approval rates from certifying agencies for secondary aggregates under the national end of waste criteria, limiting efforts to recycle construction waste:**
 - Addressing the approval rates for secondary aggregates is one solution to this barrier but it must also go beyond this. Please see previous points made under the Circularity heading.
- **30. Insufficient incentives to decarbonise construction sites – supports needed for EVs, Battery Energy Storage Systems and HVO-based equipment as alternatives to diesel powered units:** IGBC's has done a sizable amount of work on the decarbonisation of construction process for buildings in Ireland, through the [DECAR-CON](#) project, which is funded by Construct Innovate, Walls Construction and John Paul Construction. The full report is expected before the end of this year.

Key barriers and potential solutions include:

- Fragmented data collection - Every subcontractor has their own ways to collect the data, which makes it difficult to share and receive data.
- Lack of policy direction, data tracking, and market incentives for decarbonising material transport to and from sites.
- Grid modernisation challenges and bottlenecks limit reliable power supply for electric construction machinery, particularly on larger projects.
- Lack of knowledge about how to document properties of used materials complicates decisions about reuse and recycling suitability.
- Zero-emission equipment benefits not yet reflected in procurement scoring systems, limiting incentive to fully transition away from fossil-fuel machinery.
- Limited availability of electric construction machinery and vehicles creates a new, immature market with few options for contractors.

IGBC's [second Policy Scorecard 2026](#) outlines the progress policy has made at a national and local level in decarbonising the built environment, including the barriers that still stand

in the way as well as what actions should be taken next. We have outlined them as a short summary of our key points below.

Additional barriers to achieving climate targets

- Piecemeal and inconsistent implementation across planning and regulation is reducing the effectiveness and efficiency of emissions reduction efforts.
- Delays in translating funding into measurable outcomes (e.g. green public procurement)
- Gap between policy ambition and on-the-ground delivery e.g. GPP, energy renovation, vacancy
- At the local level, there is an ongoing knowledge and skills gap along with slow integration of climate policy into routine policy decisions.
- Resourcing constraints and dependence on national funding is limiting what local authorities can achieve and leading to inconsistent approaches across local authorities as well as within the organisations.

Potential ways to address barriers

- Urgently communicate on the transposition of the EPBD and engage with stakeholders to ensure it fully supports the decarbonisation of the 'built environment and a 'just transition' away from fossil fuels.
- Keep investing in energy efficiency and adaptive reuse to protect the most vulnerable households from external shocks, like surging fossil fuel prices.
- Build upon current research e.g. e.g. Construct Innovates [Regulatory Sandbox project](#) and actions included in Delivering Homes and Building Communities 2025 – 2030, to review building standards and regulatory pathways to fully support the decarbonisation of the industry.
- Incentivise training and workforce upskilling for sustainability and renovation e.g. the introduction of a sustainability passes similar to safe pass for health and safety.

- Locally, best practice should be shared across different departments within local authorities as well with other local authorities in the region to ensure implementation of climate action across the country.
- Cost-effective climate action plans should also be fully integrated into new development plans e.g. reusing brownfield sites rather than developing on greenfield sites, to save on infrastructure costs.

Q6. The principles of a Just Transition (evidence-base and structured; skills and opportunity; fair sharing of costs; social dialogue and lived experience) are explained by the Just Transition Commission. What are your views on how these principles can be incorporated into the next CAP or climate action more generally?

Our comments relate to the cost of climate action being shared equitably in society (**fair sharing of costs**), and people being equipped with the right skills to be able to participate in and benefit from the future net zero economy (**skills and opportunity**)

Fair sharing of costs:

The criteria of the SEAI Free Energy Upgrade Programme should be reviewed on a regular basis to ensure it provides additionality and that the most vulnerable groups in society have access to it. Currently, certain groups at risk of energy poverty such as those in the private rental market are not covered in the free energy upgrade scheme.

In the latest National Residential Retrofit plan released earlier in 2026, increased grant support for local authorities and Approved Housing Bodies (AHBs) was announced which was a positive development. However, renters and households just above eligibility thresholds still remain largely excluded from supports that would allow them to live in warmer, more energy-efficient homes.

Government should consider opening the free energy upgrade scheme to tenants receiving HAP, on the condition of a long-term lease being offered. Households could also be further prioritised (e.g., based on income/P60 form) as part of the free upgrade scheme. New schemes to better support households falling just above the free energy upgrade threshold should also be piloted and introduced e.g. a sliding scale on the rate of grants based on income as done in France and the Netherlands. Other actions to further support the most vulnerable households in their renovation journey should also be considered – in particular to make energy renovation more accessible. For example, the pilot scheme announced in the 2026 National Residential Retrofit Plan, assigning a Community Energy Project Coordinator to each local authority, is linked to the Healthy Age Friendly Homes initiative. This approach should be expanded to benefit a wider range of households. This is fully aligned with the recast of the Energy Performance of Buildings Directive (EPBD) which states: “financial incentives and other policy measures should as a priority target vulnerable households, people affected by energy poverty and people living in social housing”.

It is also important to note that a coordinated approach is needed to the delivery of policies funded through the EU Just Transition Fund and Social Climate Fund, alongside clear and consistent standards across the Department, to ensure funding is aligned with policy objectives and delivers maximum impact.

Skills and opportunity

The transition to a low-carbon built environment presents a major opportunity for Ireland to create sustainable, locally based employment. Energy renovation should be given the same strategic importance as new housing delivery, as meeting Ireland's renovation targets can support quality jobs in every county while reducing emissions, improving energy security, tackling fuel poverty, and providing much needed homes – if a holistic approach to energy renovation and regeneration is taken.

Unlike many industries, renovation work cannot be outsourced or relocated. A large-scale renovation programme would create long-term employment opportunities across urban and rural communities, making it a key part of a just transition.

Continued investment in skills and training will be needed to support this growth. Positive progress has been made through the NZEB and Retrofit Centres of Excellence and the introduction of a mandatory Construction Industry Register from 2026, but these measures should form part of a broader strategy to build the workforce needed to deliver Ireland's housing, energy and climate objectives. Furthermore, upskilling need to be further incentivised. E.g., through the introduction of a sustainability pass similar to the safe pass for health and safety.

Biobased materials industry

Expanding the use of biobased construction materials offers significant economic, social and environmental benefits. In addition to reducing embodied carbon and reliance on imported materials, it can support the development of domestic supply chains, new manufacturing capacity and sustainable employment opportunities in rural communities. Ireland has a strong track record of developing strategic rural industries that deliver economic resilience and regional development, including Irish Sugar, Bord na Móna and Medite Smartply. Building on this experience, investment in biobased materials such as timber, hemp, wool and other agricultural fibres could support new value chains, create skilled jobs, diversify farm incomes and contribute to both EPBD implementation and Ireland's wider climate objectives. (The Housing Commission, 2024).

Q7. The National Adaptation Framework and the Sectoral Adaptation Plans have been published. To what extent should further climate change adaptation measures be included in the next CAP?

Adaptation of the built environment

Following a summer of record-breaking temperatures across Europe, the need to invest in climate change adaptation has never been more urgent, particularly in ensuring that the built environment is resilient to increasingly frequent and severe extreme weather events. With substantial public investment already being directed towards new-build housing and a national programme of building renovation, it is prudent to integrate climate mitigation and adaptation measures from the outset. Failing to do so risks significantly higher costs in the future, as buildings and infrastructure may require extensive retrofitting to withstand a changing climate.

We recommend these actions:

- **Develop a national, standardised framework** to assess the climate risks for all publicly funded new-build and retrofit projects. This would provide greater certainty for insurers and investors.
- **Improve funding for urban greening and nature-based solutions** as part of public infrastructure schemes to enhance their quality and extent. This builds upon recent funding announced for local authorities for nature-based solutions to be used in the public realm.
- Introduce requirements for the **assessment and management of overheating risk**, similar to approaches adopted in the UK.
- Additional financial support should also be made available for measures that improve **indoor environmental quality, including mechanical ventilation systems and air-to-air heat pumps**

