



An Coimisiún um  
**Rialáil Cumarsáide**  
Commission for  
**Communications Regulation**

# Climate Action Roadmap

November 2025

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# 1 Introduction

The Government's [Climate Action Plan 2025](#) (CAP25) commits that public sector bodies will complete their individual Climate Action Roadmaps. These Roadmaps are to be submitted in Q4 2025.

This roadmap reports on the progress made since the last ComReg Climate Action Roadmap produced in 2023 and outlines how ComReg continues its aim to meet the requirements of the Public Sector Climate Action Mandate and reach its 2030 carbon and energy efficiency targets.

The ComReg Roadmap is based on the SEAI/EPA Public Sector [guidance](#) for the preparation of Climate Action Roadmaps. In accordance with the guidance, this latest Roadmap is focussed on updating ComReg's plans for reducing total energy related emissions and fossil fuel related emissions from its operations. It is also focussed on continuing to raise awareness among staff of ComReg's contribution to climate action and sustainability related matters in line with Government commitments. This is in line with the targets in CAP25. The scope of the roadmap has been expanded to include other non-energy greenhouse gases, indirect emissions, and adaptation to climate change. This version of the roadmap takes account of energy guidance for public bodies published by the SEAI.

## 1.1 Climate Action Mandate

This roadmap sets out ComReg's plans for implementing the Public Sector Climate Action Mandate (the Mandate) as set out in CAP25, by taking, and reporting on, the actions of the Mandate. ComReg is committed to playing its part by taking the necessary climate action to reduce Ireland's GHG emissions by 51% by 2030.

Further iterations of the ComReg Climate Action Roadmap will be developed to take account of future updates to the Climate Action Plan and any changes in the SEAI/EPA Guidance.

## 1.2 Compliance with Legal requirements

ComReg will ensure that it fulfils all obligations in relation to the implementation of the Government's climate policies and related legislation, including under the Climate Action and Low Carbon Development Acts 2015 to 2021 (the Acts) requiring ComReg to perform its functions, in so far as practicable, in a manner consistent with national climate plans and strategies, and furthering the achievement of the national climate objective when the relevant provisions are commenced.

## 1.3 Leadership & Governance for Climate Action

The Climate Action Mandate requires that leadership and governance structures for climate action are set up, and that workers are engaged with climate action and have appropriate training.

# 2 Our targets

## 2.1 Energy Efficiency

ComReg like other Public Bodies must report their energy performance annually using the Sustainable Energy Authority of Ireland's (SEAI's) Monitoring & Reporting (M&R) System. This system is used to track progress (by each Public body) towards energy and climate policy targets. Each year ComReg is required to input data on energy usage which is converted by the M&R System into CO2 emissions calculations etc which are used to calculate our progress on energy and climate policy targets.

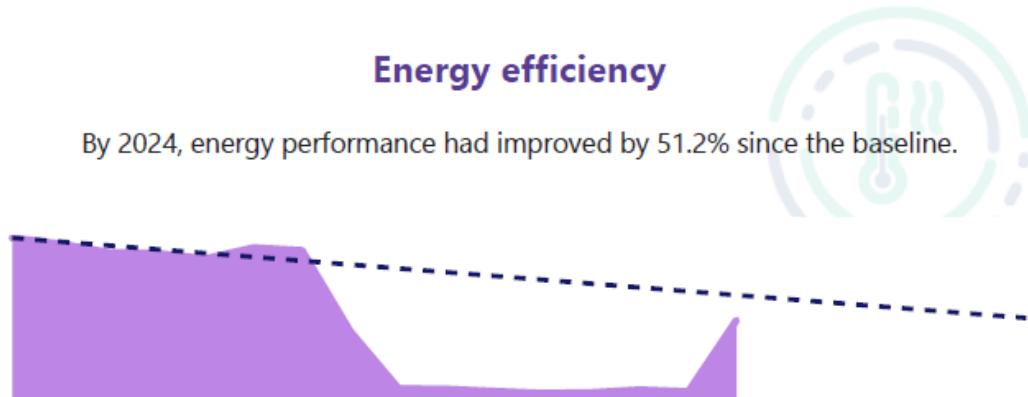
Every public body has three headline targets for 2030:

- Improve energy efficiency by 50% by 2030, compared to an energy efficiency baseline.
- Reduce fossil CO2 emissions by 51% by 2030, from a baseline of 2016-2018.
- Achieve a total (energy-related) CO2 target for 2030, in tonnes, which equals its fossil CO2 target plus its electricity emissions at GHG baseline less the projected supply-side emissions reduction from electricity by 2030.

The M&R system data shows that ComReg will be on track to reduce its emissions in line with the 2030 target. The graph below, taken from the M&R system, shows that energy performance in ComReg for 2024 improved by 51.2% since the baseline. The data suggests that if energy performance is maintained at this level for another 6 years the efficiency target for 2030 will be achieved.

The ComReg activity metric of Full Time Equivalents (FTE's) has increased in recent years since the baseline year and it is anticipated that this will continue due to the introduction of legislation which has, and will, result in additional functions for ComReg.

Details of our Energy efficiency is shown in the chart below. The purple shaded area represents our Energy Performance Indicator and is set at 100% in 2009 i.e. at the top left of the graph and energy performance for each year to 2024 is shown. The dotted line shows the direction of travel of our energy performance i.e. it has improved by 51% since 2019.



If energy performance is maintained at this level for another 6 years, the efficiency target will be achieved. No planned energy-saving projects that will improve performance in 2030 have been reported\*.

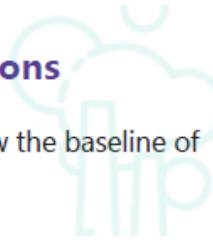
## 2.2 Emissions

The information below is taken from the M&R system and reports on ComReg's expected achievement of the climate action targets. The data show higher levels of emissions than we originally expected and hence we plan to review the source data input into the M&R system.



## Fossil CO<sub>2</sub> emissions

In 2024, fossil CO<sub>2</sub> was 15.9% below the baseline of 12,853 kgCO<sub>2</sub>.



**2024: 10,803 kgCO<sub>2</sub>**

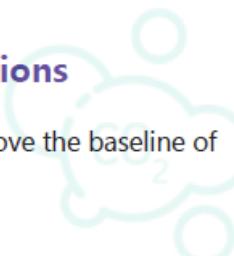
**2030 target: 6,298 kgCO<sub>2</sub>**

To achieve this target, fossil CO<sub>2</sub> must reduce by another 41.7% from 2024 level within 6 years. No planned energy-saving projects have been reported that will reduce fossil CO<sub>2</sub> in 2030\*.



## Total CO<sub>2</sub> emissions

In 2024, fossil CO<sub>2</sub> was 175.8% above the baseline of 37,290 kgCO<sub>2</sub>.



**2024: 102,848 kgCO<sub>2</sub>**

**2030 target: 10,985 kgCO<sub>2</sub>**

To achieve this target, total CO<sub>2</sub> must reduce by 89.3% from 2024 level within 6 years. No planned energy-saving projects have been reported that will reduce total CO<sub>2</sub> in 2030\*.

We report annually on implementation of the Climate Action Mandate requirements using SEAI's Public Sector M&R System (when required) adopting a "comply or explain" approach.

### 3 Our People – Leadership & Governance for Climate Action

Engaging the people who work at ComReg is key to our success in achieving our climate action targets. To this end, following the restructuring of the Green Team in 2023, the Green Team operates as follows:

- Reports via the Director of Corporate Services to the ComReg Leadership Team
- The Director of Corporate Services is the Leadership Team's nominated Climate and Sustainability Champion.
- The ComReg Chairperson is the nominated Climate and Sustainability project Sponsor
- Climate action and sustainability awareness-raising and training (technical and behavioural) is incorporated into learning and development strategies for staff
- Awareness-raising activities, including workshops and presentations are organised periodically to engage on climate issues, including a focus on decreasing the organisation's carbon footprint.

The above actions build on the initiatives set out in the 2023 Roadmap and continue to enhance current practices.

#### 3.1 Governance Structure

- The ComReg Leadership Team acts as the Steering Group for driving sustainability in ComReg and ensuring the actions set out in the ComReg Climate Action Roadmap are realised.
- The Climate and Sustainability Champion takes ownership of this plan, shares it with staff and sets a timeframe for putting these measures in place. The Champion will also have responsibility for implementing and reporting on the Mandate.
- The ComReg Green Team, reporting to the ComReg Leadership Team, acts as an integrated driver of sustainability in ComReg.
- The Head of Finance and Governance is ComReg's Energy Performance Officer (EPO) and is responsible for liaising with the SEAI and reporting to the SEAI Public Sector Energy Performance Monitoring & Reporting System.

### **ComReg Green Team Terms of Reference:**

**Role & Responsibilities:** The Green Team will act as an integrated driver of sustainability in ComReg and will initially focus on the energy targets.

**Reporting:** The Team will be chaired by the Climate and Sustainability Champion and will report to the ComReg Leadership Team.

**Meeting Frequency:** The Green Team will meet at least quarterly.

**Membership:** The Team is composed of the following members

#### **Role**

Director of Corporate Services

Head of Finance and Governance

Head of HR

Facilities Manager

Procurement Officer

IT Operations Manager

Divisional Representative (4):

Market Framework;

Retail & Consumer Services,

Wholesale;

Strategy & Economics division

representative and

Legal adviser (Office of General Counsel)

## **4 Staff Engagement**

### **4.1 Staff Training**

All Staff are given access to e-learning courses from the SEAI Energy Academy and reminders are issued twice a year to ensure new joiners are aware of the training. In 2025, we are advancing plans to revise our core training modules for managers to include environmental awareness and sustainability training and to have these available in 2026.

## **4.2 Climate Action and Sustainability Workshops**

As part of our 2025 ComReg Climate Action and Sustainability Awareness-raising Week taking place in October, staff were invited to attend workshops on sustainability and will receive communications on how they can make a positive change.

## **4.3 Senior Leadership Training**

ComReg is committed to ensuring its Leadership Team has appropriate climate leadership knowledge at senior management level. ComReg does not have access to OneLearning courses to allow individuals to join in with other organisations. Hence it is our intention to put in place appropriate training in 2026 to ensure best value for money and up to date knowledge on such matters.

## **4.4 Use of Public Transport**

Staff are encouraged to take public transport and to avail of the access to a range of public transport methods in the vicinity of the office. Staff can avail of the Taxsaver Commuter Ticket Scheme to reduce the cost of public transport. Cycling to work is encouraged through the Bike to Work scheme, locally available public rental bike facilities and onsite secure bike parking. Initiatives are advertised to staff at induction, in the monthly newsletter and on advertising screens in the canteens.

## **4.5 Foreign Travel**

In line with the provisions of Circular 01/2020, ComReg records, monitors, and values the greenhouse gas emissions associated with official air travel usage and makes a payment to the Fund Manager of the statutory Climate Action Fund related to these emissions for the preceding year. ComReg submitted its 2024 Annual Return and payment of €3,056 in relation to the offsetting emissions associated with official air travel, to the Climate Action Fund in February 2025.

# **5 Our ways of Working**

We intend to continue to monitor and report on performance to reduce consumption of energy and other resources. We have made efforts to make to reduce our energy use, our waste generation, and to reduce reliance on paper, eliminate single use plastics and increase recycling and composting.

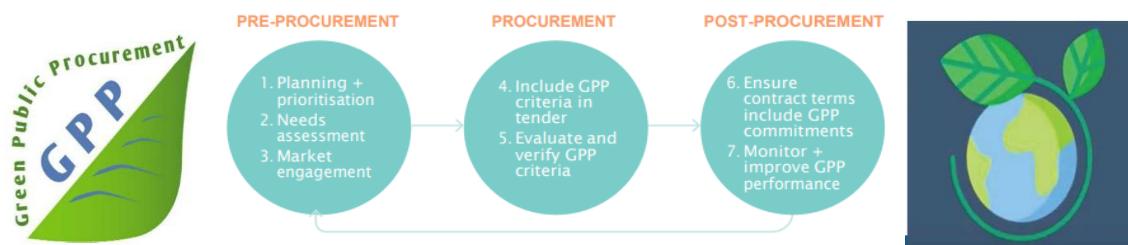
## **5.1 Energy Management Systems etc**

ComReg follows a structured approach to energy management (based on the Public Sector Energy Efficiency Strategy), as follows:

- Commitment: senior management buy-in; staff empowerment to act
- Identification of key areas and actions for improvement following energy performance report from SEAI
- Plan of action including (where appropriate) setting annual energy saving targets
- Action: implementation of projects
- Review: measure results annually, continually improve, review

ComReg's energy management programme includes engaging with SEAI on energy consumption via the SEAI M&R system. The main energy users in our offices are heating, ventilation and air conditioning (HVAC) systems, lighting and IT servers. As a tenant in a multi-tenanted building we are limited in the number of improvements we can make to the HVAC systems.

## 5.2 Green Public Procurement



ComReg uses the Green Public Procurement (GPP) process to source relevant goods, services or works with a reduced environmental impact. The GPP guidance and eleven accompanying criteria sets<sup>1</sup> published by the Environmental Protection Agency (EPA) is used to support our procurement procedures and to support climate action ambitions including improved energy efficiency. For all tenders above the national threshold, all public sector bodies should include GPP criteria where possible and ComReg adheres to this as required.

Green criteria search tool is reviewed for inclusion where relevant in the Request for Tenders (RFT) selection and award criteria when procuring goods and services (reference Circular 17/2025), using the published GPP guidance and criteria sets.

<sup>1</sup> The eleven criteria sets are Road Transport Vehicles & Services; ICT Products & Services; Food & Catering Services; Indoor Cleaning Services; Office Buildings Design, Construction & Management; Indoor & Outdoor Lighting; Heating Equipment; Energy related Products and Paper Products & Printing Services and Furniture and related services

A system to gather and record data on GPP implementation will be established, using the reporting template and guidance developed for government department reporting as a reference.

**GPP Action /Outreach completed:**

- Corporate Procurement Plan (CPP) 2024-2025 includes introductory details to GPP. Our next CPP will report on how ComReg incorporates green considerations and set out future plans.
- The Office of Government Procurement (OGP) launched an online search tool to support green public procurement during its annual conference held in Dublin Castle, in November 2022. The GPP Criteria Search Tool is available on the gov.ie website (link: [GPP Criteria Search](#)).
- ComReg Template Tender Documentation (RFTs) includes a link to the GPP Criteria Tool, and an information note to ask that staff check the online search tool for Green Criteria in tender competitions. ComReg's Procurement Process directs that a note confirming inclusion or non-inclusion (and justification) for GPP Criteria is captured in the procurement job.
- ComReg will continue to use OGP Contracts as and where feasible. A link to all Central Government arrangements is maintained on the ComReg Intranet.
- On the ComReg Intranet, a separate category has been set up for GPP to provide relevant GPP User Guidance documentation for the information of all staff.
- The June 2025 issue of the Quarterly Procurement Newsletter focused on GPP. It was issued to all staff on 7 July 2025.
- “EPA GPP Report (2023) and Related aspects” presentation was delivered by Martin Doyle from Circular Economy Programme, EPA to all staff on 9 July 2025.
- Annual Public Procurement Training included a module on GPP in February 2025.
- Green procurement is included in the annual procurement training from external legal advisors, arranged by the ComReg Office of the General Counsel.

## **5.3 Organic Food**

ComReg does not provide a canteen service for staff and hence this requirement is not relevant to ComReg.

## **5.4 Food Waste**

ComReg, like other public bodies, is required to measure and monitor the food waste generated on premises from 2024. ComReg has provided segregated bins across both floors of its offices to facilitate segregation of organic/biowaste, recycling and general waste.

ComReg had previously removed individual bins at desks to encourage staff to segregate waste and bring to centralised bins. ComReg does not provide a canteen service for staff and does not produce canteen food waste. Where catering for events is provided, orders are based on the registered attendee numbers to reduce waste, and any leftover food is offered to staff to minimise potential waste.

## **5.5 Single Use items**

ComReg has removed biodegradable disposable cups from all water machines with a view to reducing their use. Any cups used are biodegradable ensuring best practice waste management. We also provide keep cups and reusable water bottles to staff thereby reducing the use of single use items.

## **5.6 Paper and paper-based processes**

One of ComReg's key organisational change and efficiency programmes was our Working with Documents Programme (WWD) introduced in 2022. This programme underpinned a digital transformation project that facilitated ComReg staff working from home during and after the pandemic and continues to be built upon in the now well-established blending working environment. The WWD programme led to the implementation of digital processes and the promotion of a non-printing policy where appropriate. Our levels of printing of documents have declined and this is an area we will continue to monitor.

## **5.7 Water**

ComReg provides drinking water refill points for all staff across the office. It is currently not possible to measure and monitor water usage in our office. We plan to liaise with the landlord in this regard.

## **5.8 Waste Management**

ComReg has provided segregated bins across both floors of our office; organic/biowaste, recycling and general waste. We track waste generation to reduce the environmental impact through waste reduction measures.

Electrical and electronic equipment waste (WEEE) was disposed of responsibly (in accordance with Directive 2002/96/EC of the European Parliament and of the

Council). Other waste was recycled where possible, i.e., glass, print cartridges and batteries. Battery boxes and cartridge bins are provided on-site.

## **5.9 Construction**

The requirement under the Mandate to specify low carbon construction methods is not relevant to ComReg.

## **5.10 Buildings & vehicles**

ComReg occupies a building under a long-term lease and as a tenant faces challenges in delivering on energy efficiency and greenhouse gas emissions reduction targets due to its aged building and the fact that ultimately any such decisions will be made by our landlord.

ComReg's role is likely to expand in the coming years, and a project is underway to review our future accommodation needs, and this project will be undertaken with a view to minimising ComReg's carbon emissions and supporting compliance with the Mandate.

ComReg purchases the vehicles its uses. Where practicable, when a vehicle is due for replacement, consideration is given to procurement of a zero-emission vehicle.

## **5.11 Procurement of ICT Equipment**

ComReg endeavours to ensure that, as far as practicable, that we purchase equipment that is environmentally sustainable. We are nearing the end of an infrastructure refresh where sustainability and energy efficiency were included as key evaluation criteria. The bulk of the new infrastructure is compliant with the Energy Star standard meaning in that they consume less energy and have a reduced carbon footprint. As the organisation continues to grow and our IT footprint expands, we are committed to a cloud first strategy to minimise the burden and overhead of physically owned and hosted IT infrastructure. This approach will also extend to our cloud environments, ensuring optimal resource utilisation and reduced environmental impact.

# **6 Our wider climate action plans**

For information on ComReg's externally focussed environmental matters and climate change, please see Appendix 1.

## 7 **Review & Approval**

The Climate Action Roadmap is reviewed by the Leadership Team annually, amended as appropriate on an annual basis, and approved by the Commission.

# Appendix 1: Our wider climate action plans

Increasing awareness and attention is being placed on the relationship between the Electronic Communications Services (ECS) sector, its environmental impact and climate change.

ComReg cooperates with the Department of Culture, Communications and Sport (DCCS) on drafting specific actions for the annual Climate Action Plans.

## Government Climate Action Plans (CAP)

ComReg has been assigned specific actions in Government [Climate Action Plans](#) up to 2024. For further information see <https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/climate-action-plan/>.

## Sectoral Adaptation Plans (SAPs)

- Under the National Adaptation Framework (NAF) 2018, the first Sectoral Adaptation Plan (SAP) for Communications Sector was published in 2019 containing 11 sector-specific adaptation actions.
- ComReg has inputted into DCCS for the revision of the 2019 Communications SAP which is due to be published in Q4 2025.

## BEREC – Body of European Regulators for Electronic Communications

ComReg is a member of BEREC and an active participant in the BEREC Working Group (WG) on Sustainability, which was formed in 2020.

- ComReg contributed to the drafting of BEREC's first report on environmental sustainability '*Assessing BEREC's contribution to limiting the impact of the digital sector on the environment*'. The conclusions highlighted the lack of available data on the environmental impact of ICT and the need for a harmonised approach to measuring this impact for improved transparency and comparability.

- In response to the findings from BEREC's first report on environmental sustainability, the WG published a separate report in October 2023 on '*Sustainability Indicators for Electronic Communications Networks and Services*', following a series of workshops and surveys sent to industry and national regulatory authorities (NRAs). This workstream sought to explore the environmental indicators which, if widely adopted on a harmonised basis, would give an accurate and reliable picture of the environmental impact of ESC/N, and allow for comparison across operators. This work helped to inform the ongoing work of the European Commission on developing a Code of Conduct (CoC) for sustainable Electronic Communication Networks which is due by end of 2025.
- In collaboration with BEREC Expert Networking Group (ENG) on Communications, the BEREC WG on Sustainability utilized the key findings from the previous reports and in June 2024 published a report on "*ICT sustainability for end-users: Empowering end-users through environmental transparency on digital products*". The report aimed to raise awareness of environmental impacts and provide information to end users on the environmental impact of ECS/N. A communication campaign with infographics and useful tools on end users' digital devices was also delivered as part of this workstream.
- ComReg also contributed to drafting of the BEREC report on "*Infrastructure Sharing as a lever for ECN/ECS Environmental Sustainability*" which was published in June 2025. The report outlined how have BEREC members transposed and implemented relevant EU provisions related to network and infrastructure sharing. It also explored the environmental benefits of infrastructure sharing and its potential to reduce the negative environmental impacts of electronic communications networks.

## OECD Network of Economic Regulators (NER)

Every 5 years the OECD NER conducts a data-gathering exercise for Governance of Sector Regulators & Indicators of Product Market Regulation (PMR). For the first time, the 2023 exercise included pilot questions on 'Green Governance', which ComReg responded to as part of its submission. The OECD published the results of the pilot study in 2024<sup>2</sup>. ComReg will engage in the next round of this OECD exercise (2028).

## Confidence & Awareness Surveys

Annually, since 2021, ComReg includes questions in its Confidence and Awareness surveys to gain insights into consumer attitudes toward the environmental sustainability of mobile service providers. In the 2024 survey results, over two in five (45%) respondents stated that environmental sustainability is an important factor when choosing a mobile phone provider. Around three in ten consumers respond that they

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<sup>2</sup> [The Role of Economic Regulators in the Green Transition \(EN\)](#)

would like to know more about the environmental impact of their mobile phone service (29%) and just under a third (31%) of respondents would like more information about the greenhouse gas emissions associated with the mobile data they consume.

## **Climate Change Advisory Council (CCAC) & Environmental Protection Agency (EPA)**

ComReg collaborates with DCCS to respond to the annual adaptation scorecard review for the Communications Sector. ComReg remains in contact with the EPA regarding publications and workshops concerning the ICT aspect of critical infrastructure.

In June 2025, the EPA published Ireland's first National Climate Change Risk Assessment (NCCRA). The NCCRA project, which commenced in January 2024, aimed to identify risks to Ireland from climate change. This project provided valuable insights for the revised Sectoral Adaptation Plan under the NAF.

ComReg has contributed to the development of the NCCRA as part of the expert working group. Accurate information on the risks relating to the Communications sector was provided by ComReg's experts.

## **Call for Inputs**

In 2019, ComReg issued a Call for Inputs (CFI) to better understand the relationship between connectivity and decarbonisation, including how the sector can assist in facilitating decarbonisation across the economy, how the sector can reduce its own carbon footprint and how it can adapt to a changing environment. The responses received highlighted that ECN/S can enable GHGE reductions across a variety of sectors of the economy, such as transport, electricity, industry and agriculture. While this workstream was not repeated, the findings remain relevant in terms of the 4 sectors (transport, electricity, industry and agriculture) that are enabled by communications sector.