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Introduction

Background

- 9.1 This Chapter of the Environmental Impact Assessment Report (EIAR), prepared by SLR Consulting Ireland, addresses the potential effects of the proposed development on Climate. The proposed development is located at Mounthall and Cummer townlands, Camross, Co. Laois.
- 9.2 The proposed development comprises:
- Continued use and extension to existing permitted sand and gravel pit registered under Section 261 of the Planning & Development Act 2000, as amended (site ref. QY05/10) within an overall application area of c. 12.2 hectares;
 - Extraction of sand and gravel (dry working) over an area of c. 8 hectares with processing and washing of material on site (closed loop water recycling system with associated silt storage lagoons 1,952.25m²), and all ancillary works and structures;
 - Site facilities consisting of mobile processing plant, portacabin site office (6.25m²), portacabin welfare facility (18.9m²), serviced portaloo toilet, bunded fuel storage and refuelling pad with hydrocarbon interceptor, weighbridge, wheelwash, water supply borehole, perimeter berms, vegetation planting and fencing;
 - Access to the site will be via the existing sand & gravel pit entrance;
 - Restoration of the site to agricultural lands; and
 - The proposed extraction operational period is for 10 years plus 1 year to complete restoration (total duration sought 11 years).
- 9.3 The proposed hours for operations (extraction, processing and haulage) at the site will be 07.00 hours to 18.00 hours Monday to Friday inclusive and 07.00 hours to 14.00 hours on Saturdays. No operations will be carried out on Sundays or Public Holidays¹.
- 9.4 The proposed development will have an annual average extraction rate of c. 80,000 tonnes per year. Based on this output level the proposed development will generate an average of c. 24 HGV trips per day (i.e. 12 loads per day). The development will also generate some light vehicular traffic, principally by employees and visitors travelling to and from the site. This equates to an average of 12 staff and visitor light vehicle trips daily. Further information on the proposed development, site activities, environmental management systems and controls at the application sites are provided in EIAR Chapter 2.

Scope of Work

- 9.5 The following sections of this Chapter describe the potential climate change impacts associated with the proposed sand and gravel pit continued use and extension development. The following issues are addressed separately:
- climate change legislative framework / policy context;
 - analysis of evolving environmental baseline trends;
 - identifying climate change concerns in relation to proposed development;

¹ DoEHLG 2004 Quarry & Ancillary Activities Guidelines for Planning Authorities – Section 4.7 (b)

- assessing effects (cumulative effects and uncertainty);
- identifying alternatives and mitigation measures; and
- identifying monitoring and adaptive management.

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Consultations / Consultees

- 9.6 A formal pre-planning consultation meeting was held online between officials of Laois County Council, SLR Consulting Ireland and the Applicant on the 1st May 2024 and no specific matters in relation to climate arose.
- 9.7 In addition to the pre-planning consultation meeting, a pre-planning consultation document was issued to 13 no. statutory consultees which included the EPA, An Taisce, the HSE and the Heritage Council. The full list of statutory consultees and summaries of their responses is provided in Chapter 1, sections 1.33 to 1.40 and **Table 1-1**.
- 9.8 There were no items relating to climate included in any of the statutory consultees responses, other than mention from the HSE that they recommend that Climate be included and assessed in the EIAR.
- 9.9 Following a review of published development plans and site surveys, it was considered that there was no requirement for any further formal external consultations to be carried out in respect of air quality for the purposes of this assessment. There was however consultation with other specialist contributors to this EIA Report.

Contributors / Author(s)

- 9.10 The climate impact assessment presented in this Chapter was prepared by SLR Consulting Ireland. The lead consultant for the study was Conor Hughes MSc. Energy Science and Hannah McGurran BSc. Environmental Science. A review was carried out by Shane McDermott BSc (Hons) MSCSI MRICS.

Limitations / Difficulties Encountered

- 9.11 There are currently no published guidelines and established methodology providing specifically for assessment of climate impacts from quarrying activities in Ireland. This Chapter of the EIAR has therefore been prepared based on general cross-sectoral guidance.

Legislative Framework / Policy Context

- 9.12 In recent years, there has been increasing public awareness about the implications of past, ongoing, and continued future emissions of greenhouse gases on the earth's climate. The implications of such change will potentially have significant impact on local communities and national populations across the world. The ever-increasing awareness and acceptance of this reality has, in recent years, prompted significant public policy development around emissions and climate change.
- 9.13 An overview of the legislative framework and policy context which informs this assessment of potential climate impacts of the proposed development at Mounthall is presented in **0**. This provides background detail in respect of the following:
- National Policy on Adaption to Climate Change
 - Sectoral Adaption Plans
 - Local Level Adaption

- The Climate Change Action Plan 2021 (CAP 2021)
- Regulation / Control of Greenhouse Gas Emissions
 - Paris Agreement (2015)
 - Kyoto Protocol (2008-2012)
 - EU 2021-2030 Targets for non-ETS sector emissions- Effort Sharing Regulations
 - Energy White Paper (2015)
- Future Management of Flood Risk
- EIA Directive 2014/52/EU
- Published Guidelines
 - Guidance on Integrating Climate Change and Biodiversity into EIA
 - Assessing Greenhouse Gas Emissions and Evaluating their Significance
 - Climate Change and Major Projects
 - Sector Planning Guidelines for Climate Change Adaption
 - Local Authority Strategy Development Guidelines.

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Laois County Council Climate Adaption Strategy 2019-2024

- 9.14 Under the National Adaptation Frameworks (NAF) the Environment Directorate of Laois County Council developed the Climate Adaptation Strategy for County Laois². The strategy is the primary instrument at local level to ensure a clear understanding of the key risks and vulnerabilities of climate change; implement climate resilience actions in a planned manner and ensure that climate adaption considerations are integrated into all plans and policies and all operations and functions of the local authority.
- 9.15 Based on the risk register and the priority risks categorised by Laois County Council, six high level goals based around thematic areas were identified which identify the desired outcomes anticipated through the effective implementation of the climate change adaption strategy, from which were identified:
- **Local Adaptation Governance and Business Operations:** *“Climate Change adaptation considerations are mainstreamed and integrated successfully into all functions and activities of the local authority ensuring operational protocols, procedures and policies implement an appropriate response in addressing the diversity of impacts associated with climate change”.*
 - **Infrastructure and Built Environment:** *“Increased capacity for climate resilient structural infrastructure is centred around the effective management of climate risk, informed investment decisions and positive contribution towards a low carbon society.”*
 - **Land use and Development:** *“Sustainable policies and measures are devised influencing positive behavioural changes, supporting climate adaptation actions and endorsing approaches for successful transition to low carbon and climate resilient society.”*
 - **Drainage and Flood Management:** *“Great understanding of risks and consequences of flooding and successful management of a co-ordinated approach to drainage and flooding.”*

² <https://laois.ie/wp-content/uploads/draft-laois-county-council-climate-change-adaptation-strategy-2019-2024.pdf>

- **Natural Environment, Built & Cultural Heritage:** *“Fostering meaningful approaches to protecting natural and key cultural assets through an appreciation for the adaptive capacity of the natural environment to absorb the impacts of climate change.”*
- **Community, Health & Wellbeing:** *“Empowered and cohesive communities with strong understanding of climate risks, increased resilience to impacts of climate change with capacity to champion climate action at local level.”*

Receiving Environment

Climate Environmental Baseline

Regional Context

- 9.16 Observations of increases in global average air and ocean temperatures, widespread melting of snow and ice, and rising sea level are unequivocal evidence of warming of the climate system globally. Global mean temperature has increased compared with pre-industrial times for land and oceans. Most of the observed increase in global average temperatures is very likely due to increases in anthropogenic greenhouse gas concentrations. According to an ongoing temperature analysis led by scientists at NASA's Goddard Institute for Space Studies (GISS)³, the average global temperature on Earth has increased by at least 1.1° C (1.9° Fahrenheit) since 1880 with the majority of the warming having occurred since 1975, at a rate of roughly 0.15 to 0.20°C per decade.
- 9.17 In future years, landmasses are expected to warm more than the oceans at northern middle and high latitudes. Despite possible reductions in average summer precipitation over much of Europe, precipitation amounts exceeding the 95th percentile are very likely in many areas; thus, episodes of severe flooding may become more frequent despite the general trend towards drier summer conditions. In an ensemble-based approach using outputs from 20 global climate models (GCMs), the Mediterranean, north-east and north-west Europe are identified as warming hot spots but with regional and seasonal variations in the pattern and amplitude of warming. Regional climate models (RCMs) also project rising temperatures for Europe until the end of the 21st century, with an accelerated increase in the second half of the century.
- 9.18 For precipitation, the larger-scale summer pattern shows a gradient from increases in Northern Scandinavia to decreases in the Mediterranean region. By contrast, increases in wintertime precipitation primarily north of 45°N are a consistent feature of RCM projections over Europe, with decreases over the Mediterranean. Overall, then, there are consistent projections of change for northern and north-west Europe, including Ireland.
- 9.19 Ireland has a typical maritime climate, with relatively mild and moist winters and cool, cloudy summers. The prevailing winds are south-westerly in direction. The climate is influenced by warm maritime air associated with the Gulf Stream which has the effect of moderating the climate, and results in high average annual humidity across the country. The area of least precipitation is along the eastern seaboard of the country, in the rain shadow of the Leinster uplands.
- 9.20 Mean seasonal temperature will change across Ireland. Several studies have applied selected IPCC Special Reports on Emissions Scenarios (SRESs) to model climatic changes across Ireland at a regional scale. Despite the different methods and scenario combinations used, there is agreement in projected changes in temperature for Ireland. However, there are

³ <https://earthobservatory.nasa.gov/world-of-change/global-temperatures>

more disparities in the magnitude and sign (i.e., +/-) for the precipitation changes projected for the island.

- 9.21 **Table 9-1** summarises climate impact projections for Ireland, estimates of projections confidence are derived from published projection data from the Local Authority Adaptation Strategy Development Guidelines¹.

Table 9-1 Climate Impacts Projections: 30-Year Overview⁴

Variable	Summary	Confidence	Projected Changes
Sea Levels Rise	Strong increase	High	Projections of sea level rise to 2100 suggest a global increase in the range of 0.09-0.88m with a mean value of 0.48m. For 2050, it is reasonable to assume a sea level rise in the region of 25cm above present levels. It should be noted that due to a limited understanding of some important effects that contribute to rates of increase, these estimates of sea level rise may prove optimistic, and estimates of up to 4-6m have been projected by some models.
Storm Surge	Strong increase	Medium	An increase in the number of intense cyclones and associated strong winds are expected over the north-east Atlantic. By the 2050s, storm surge heights in the range of 50-100cm are expected to increase in frequency for all coastal areas with exception of the southern coast.
Coastal Erosion	Moderate increase	Low	Currently approximately 20% of Ireland's coastline is at risk of coastal erosion, particularly areas of the south and east coast and in isolated areas on the west coast. Rates of increase will be determined by local circumstances; however, it is expected that areas of the south-west are likely to experience the largest increase.
Cold Snaps / Frost	Moderate decrease (winter/night)	High	By mid-century, minimum temperatures during winter are projected to increase by ~2 °C in the southeast and ~2.9 °C in the north. This change will result in fewer frost days and milder night-time temperatures.
Heatwaves	Strong increase (summer)	High	Seven significant heatwaves (defined as 5+ days @ >25 °C) have been recorded in Ireland over the past 30 years, resulting in approximately 300 excess deaths. By mid-century, a projected increase in summer maximum daily temperature of approximately 2°C will likely intensify heatwaves, with maximum temperatures increasing and heatwave duration lengthening.
Dry Spells	Strong increase (summer)	Medium	There have been eight periods of insignificant rainfall in Ireland in the past 40 years. Of these, the events of 1976, 1995 and 2018 were the most severe, averaging 52, 40 and 54 days in duration respectively across Irish rainfall stations. An approximate 20% decrease in summer precipitation in many areas is strongly indicated under a high emissions scenario. This decrease is likely to result in progressively longer periods without significant rainfall, posing potentially severe challenges to water sensitive sectors and regions.

⁴ Local Authority Adaptation Strategy Development Guideline, EPA 2016

Variable	Summary	Confidence	Projected Changes
Extreme Rainfall	Strong increase (winter)	Low	Heavy precipitation days (in which more than 20 mm of rain falls) are likely to increase in frequency in winter. By the 2050s an increase in the number of heavy precipitation days of around 20% above the level of 1981-2000 is projected under both low-medium and high emissions scenarios. This may have serious consequences for flood risk in sensitive catchments.
Flooding	Moderate increase (winter)	Low	An Irish Reference Network of hydrometric stations has been established to assess signals of climate change in Irish hydrology. This network has detected an increasing trend in high river flows since 2000. Projections of future flows are beset by uncertainty at the catchment scale, but a broad signal of wetted winters and drier summers is evident across several independent studies.
Wind Speed	Minor increase (winter)	Medium	Observed wind speed over Ireland has not changed significantly in recent times, but it is anticipated that the distribution of wind will alter slightly in future, with winters marginally windier and summers marginally less so. Though the average wind speed is anticipated to change in only a minor way over the coming decades, the frequency of extreme windstorms is expected to increase due to alternations in the origin and track of tropical cyclones.

Local Context

9.22 The midland weather stations at Mullingar (c. 55km north), Birr (c. 20km west) and Gurteen (c. 27km west) are considered representative of conditions experienced at the application site.

Temperature

9.23 The moderating influence of the Atlantic Ocean is felt throughout Ireland. The annual mean temperature for different areas in Ireland varies between mountainous regions, lowlands, and the coast. Mean daily maximum temperatures at Birr averaged over the 30-year period 1979-2008⁵ were typically between 5.1 to 15.6 °C with mean daily minimum temperatures typically between 2.0 to 11.6 °C, and daily max temperatures typically between 8.1 to 19.6 °C as can be seen in **Table 9-2**. The Birr Synoptic station closed in January 2009 and was replaced with the nearby Gurteen Automatic Weather Station (AWS). Recent annual (2021-2024) mean temperatures are provided in **Table 9-2** and show comparative results to the Birr 30-year averages.

Table 9-2 Birr Meteorological Station Temperature Averages (°C) 30-year averages

	Birr: 30-Year Temperature Averages (1979-2008)												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year
Mean Daily Max	8.1	8.6	10.3	12.6	15.5	17.8	19.6	19.3	17.1	13.6	10.4	8.6	13.5

⁵ Last period for 30-year average data at Birr Synoptic station before closure in January 2009 and was replaced with Gurteen Automatic Weather Station (AWS)

	Birr: 30-Year Temperature Averages (1979-2008)												
Mean Daily Min	2.0	2.0	3.3	4.3	6.6	9.5	11.6	11.3	9.3	6.6	4.0	2.7	6.1
Mean Temperature	5.1	5.3	6.8	8.4	11.0	13.6	15.6	15.3	13.2	10.1	7.2	5.6	9.8

Table 9-3 Gurteen Meteorological Station Mean Monthly Temperature Averages °C (2021-2024)

	Gurteen: Mean temperature in degrees Celsius												
Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
2024	4.4	7.5	7.5	9.1	12.7	12.9	14.5						9.7
2023	5.8	7.2	7.3	9.0	12.4	15.8	14.9	15.6	14.6	11.0	7.4	7.2	10.7
2022	5.7	6.7	6.7	8.4	12.1	13.4	16.3	15.9	12.9	11.9	8.7	3.4	10.2
2021	3.7	6.0	7.3	7.3	9.5	13.7	17.2	15.3	14.8	11.6	7.8	7.0	10.1

9.24 The east of Ireland, which is sheltered from Atlantic frontal systems, is sunnier than the west. The sunniest months are May and June. The mean daily duration recording of sunshine for the area around Birr⁶ is 3.2 hours. December is the dullest month, with 1.4 hours of mean daily duration. May is the sunniest month, with 5.1 hours of mean daily duration, explained largely by its long days and finer weather.

Wind

9.25 Results from the synoptic meteorological station at Mullingar over a twenty-year period indicate that the predominant wind direction is from the south-western quadrant. Moderate to high-speed winds (>2 m/s) occur for approximately 77% of the time. A windrose for the wind data recorded at Mullingar is presented in **Figure 9-1**.

Rainfall / Precipitation

9.26 During the period 1978-2008, long-term monthly rates of precipitation were between 55 mm and 94.2 mm at the Birr station, with winter months receiving the heaviest amounts. The mean of the Met Eireann records indicates that average annual rainfall around Birr is approximately 846 mm / year; refer to **Table 9-4**. The average rainfall data indicates that the greatest daily total (94.2 mm) falls in the month of October. The Birr Synoptic station closed in January 2009 and was replaced with the nearby Gurteen Automatic Weather Station (AWS). Recent annual (2021-2024) and the long-term average (1981-2010) mean rainfall records are provided in **Table 9-2**.

9.27 A rain gauge station was established on the site. The rain gauge was installed on 24th April 2024 at the entrance to the existing sand and gravel pit, see **Plate 9-1** Plate 9-1below. The average monthly rainfall for the on-site rain gauge is presented in **Table 9-6**. The daily rainfall measurements are shown in Chapter 7 **Appendix 7-B**.

⁶ 30-Year Averages (1979-2008)

Table 9-4 Birr Meteorological Station Mean Monthly Precipitation (1978-2008) 30-year averages

Rainfall (mm)	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year
Mean Monthly Total	78.8	58.6	67.4	55.0	59.5	66.5	59.4	81.6	66.4	94.2	74.7	83.8	845.7
Greatest Daily Total	39.2	28.0	22.0	26.3	19.7	41.1	44.5	59.1	35.7	32.3	29.7	37.5	59.1
Mean no. days with ≥ 0.2 mm	19	15	19	15	16	16	16	18	17	19	18	18	206

Table 9-5 Gurteen AWS Mean Monthly Precipitation (2021-2024) & Long-Term Average (1981-2010)

	Gurteen: Total rainfall in millimetres												
Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Annual
2024	68.8	124.3	115.3	76.6	63.6	48.6	42.3						539.5
2023	85.4	18.5	111.6	54.8	42.9	66.7	163.3	96.3	121.4	123.1	81.2	115.0	1080.2
2022	46.6	133.6	47.4	50.1	56.2	90.5	33.2	25.1	106.7	159.8	106.9	82.9	939.0
2021	90.9	87.8	64.6	13.4	96.5	22.0	110.4	58.2	55.8	81.1	34.3	78.4	793.4
LTA ^a	96.4	66.2	74.5	59.8	68.0	71.8	66.7	84.9	74.8	103.8	89.8	91.5	948.2

^a Mean Monthly Total for long term average period of 1981-2021

Table 9-6 Average Monthly Rainfall (mm) for On Site Rain Gauge

Apr (from 25th)	May	Jun	Jul	Aug
17.4	63.4	63.6	82.2	36.2

Plate 9-1: Site Rain Gauge

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Impact Assessment

Methodology

- 9.28 In Ireland some sectors have independently begun the process of identifying key vulnerabilities for their activities. The report by the Irish Academy of Engineering, Ireland at Risk Critical Infrastructure – Adaptation for Climate Change (The Irish Academy of Engineering, 2009) and the report by the Heritage Council and Fáilte Ireland (the National Tourism Development Authority), Climate Change, Heritage and Tourism, Implications for Ireland's Coast and Inland Waterways (ed. Kelly and Stack, 2009) are examples of initiatives of this kind.
- 9.29 Other research work on adaptation in specific sectors has been carried out or commissioned by other Government Departments/bodies such as the OPW, CoFoRD (programme of competitive forest research for development research programme, etc. (e.g., CLIMADAPT).
- 9.30 A National Climate Change Vulnerability Scoping Study (Sweeney and Coll, 2012) was undertaken to identify first generation vulnerabilities for Ireland based on a sensitivity analysis across key sectors. The analysis identified a clustering of impacts and their importance in relation to an assessment of likely resilience by sector. The assessment methodology used was an impacts-first, science-first classical approach. The priority sectors identified are biodiversity and fisheries; water resources and the built coastal environment; forestry and agriculture.
- 9.31 As each sector develops its sectoral adaptation plan (under the Climate Action and Low Carbon Development Act 2015), detailed vulnerability and risk analysis will be required. Some preliminary work has been undertaken on costing the impacts of climate change in Ireland. This is now being supported by more detailed analysis of the current and future costs of flood risk management.
- 9.32 The implementation of adaptation is being supported by the development of a suite of guidelines, tools, and approaches. These include the Local Authority Adaptation Strategy

Development Guideline; and the Irish climate information platform "Climate Ireland", which includes data, information, tools, and approaches for local level adaptation decision making. Work is ongoing to develop sectoral decision-making tools and supports.

- 9.33 There are no specific tools developed for assessing climate change for extraction industry. The Climate Change and Major Project guidelines on how to make investments resilient to climate change provides a methodology for undertaking a vulnerability and risk assessment.
- 9.34 Climate change adaptation and mitigation re to be increasingly integrated in the preparation and approval of proposed development. Adaptation seeks to ensure adequate resilience of proposed development to the adverse impacts of climate change based on Vulnerability. Mitigation seeks to reduce the emissions of greenhouse gases.

Development Vulnerability

- 9.35 The aim of the vulnerability assessment is to identify the relevant climate hazards foreseen at the development location. Main steps include identifying and combining the sensitivity and exposure of the project which will describe the vulnerability, while the risk will be determined by likelihood and impact. Adaptation through project options, appraisal, and planning will depend on the assessed project vulnerability and risk.
- 9.36 Timescale for the project vulnerability and risk assessment shall correspond to the lifespan of the project. During the lifespan, there could be significant changes in frequency and intensity of weather events due to climate change, which should be considered. Detailed methodology charts for development vulnerability assessment are presented in 0.

Greenhouse Gases Emissions

- 9.37 All projects have the potential to emit greenhouse gas (GHG) emissions to atmosphere during the construction, operational and decommissioning phase of the development. Direct GHG emissions may be caused by operational activities and project commissioning/decommissioning. Indirect GHG emissions may be due to increased demand for energy and indirect GHG generating activities. Indirect GHG activities linked to the development projects may include transport, space heating of buildings / offices or loss of habitats that provide carbon sequestration, (e.g., through land-use change).
- 9.38 The significance of a project's GHG emissions should be based on its net impact, which may be positive or negative. Where GHG emissions cannot be avoided, the significance of a project's emissions shall be reduced by mitigation or project design. Where GHG emissions remain significant but cannot be reduced further approaches to compensate project emissions should be considered.
- 9.39 Currently in Ireland, there is no set methodology to evaluate significance criteria or a defined threshold for GHG emissions for the mineral extraction industry. Due to the inconsistencies between the different methods and their assumptions for assessment, there is no single agreed method by which to assess a project carbon budget. The method of assessment varies according to the type and scale of the development.
- 9.40 Due to a lack of guidelines and an established methodology, the assessment of significance of the GHG emissions is based on whether the development's GHG emissions cumulatively represent a considerable contribution to the global atmosphere and whether the development as continued or extended will replace existing development that would have a higher GHG profile.
- 9.41 Where the GHG emissions cannot be avoided, the mitigation should aim to reduce the development emissions at all stages.

Development Vulnerability Assessment

- 9.42 The aim of the vulnerability assessment is to identify the relevant climate hazards for the project at the foreseen location. A development vulnerability assessment for the proposed development is presented in **Appendix 9-C**.
- 9.43 Based on the development vulnerability assessment, measures to improve the resilience of the project to extreme rainfall, flash flood, storms, and winds are required.

Greenhouse Gas Emissions Assessment

- 9.44 For the purposes of this climate assessment, GHG emissions have been calculated for the proposed development based on an estimated annual energy use at the proposed development site in future years.
- 9.45 It has been assumed that the projected traffic movements associated with the proposed development and related activities with an annual extraction rate of 80,000 tonnes per annum will generate a maximum of 24 HGV movements (equivalent to 12 return trips) per day for 275 days in a year (50 weeks, 5.5 days a week). For the purposes of this assessment, it has also been assumed that the average distance travelled for each delivery will be 70 km each way (or 140 km in total). The total number of trips per year will be approximately 3,200.
- 9.46 Total annual GHG emissions associated with the proposed site activities are presented in **Table 9-1**.
- 9.47 It is estimated that up to c. 2,000⁷ litres of diesel will be consumed each week (for 50 weeks per year) to power on-site mobile plant & equipment, and back-up generator. It is also assumed that the processing plant, weighbridge, wheelwash, pumps and lighting and heating for site offices, welfare facilities and other buildings will collectively consume up to 5,000⁸ kWh of electrical power per week.

Table 9-1 GHG Estimated Emissions Calculations

Type	Annual Value	Distance Travelled (km)	Conversion factor	Calculated CO _{2e} kg	Total annual CO _{2e} kg
Traffic (return trips)	3,200 no.	140	0.71266	319,272	
Energy (Diesel)	100,000 litres		2.683 ^a	268,300	
Electrical Power (Offices / Processing Plant)	250,000 kWh		0.3458 ^b	86,450	
Total					674,022

^a Conversion factor for 2023 Primary Energy Conversion SEAI: diesel (kg/litre)

^b Energy conversion factor for 2023 SEAI statistics ([Conversion Factors | SEAI Statistics | SEAI](#))

- 9.48 Based on the calculated total of 674,022 CO_{2e} kg (674 CO_{2e} tonnes) and a comparison to Ireland's 2022 emissions value⁹ of c. 59M Tonnes of CO_{2e}, it is assessed that proposed operations would be c. 0.00114% of Ireland's annual CO_{2e} emissions for the duration. Similarly when compared to the 2023 emissions value of c. 55M Tonnes of CO_{2e}, it is

⁷ Based on estimated usage for similar Breedon sites

⁸ Based on estimated usage for similar Breedon sites

⁹ <https://www.epa.ie/our-services/monitoring--assessment/climate-change/ghg/latest-emissions-data/>

assessed that proposed operations would be c. 0.00122% of Ireland's annual CO_{2e} emissions for the duration.

- 9.49 Based on the scale and extent of proposed activities, GHG emissions generated by the proposed sand and gravel pit development are assessed as not making a significant contribution to the global atmosphere.

Mitigation

- 9.50 Mitigation is designed to increase the resilience of the development, or wider environmental receptors, to climate change and focuses on increasing ability to absorb climate related shocks.

Project Adaptation against Expected Climate Change Effects

- 9.51 In the context of climate change, measures to increase the adaptive capacity of the proposed development and disaster risk reduction strategies can be developed with a view to reducing vulnerability and increasing its resilience. Significant incidents related to the climate change that affect operation of the proposed development should be recorded for future analysis.
- 9.52 Based on a development vulnerability assessment (refer to **Appendix 9-C**) measures to improve the resilience of the project to extreme rainfall, flash flood, storms, and winds are considered. **Table 9-2** details specific mitigation measures for the proposed development relating to climate change adaptation.

Table 9-2 Mitigation Measures Related to Climate Change Adaptation

Main Concerns Related to:	Proposed Alternatives or Mitigation Measures
Extreme Rainfall, Flood, Flash Flood	Development scheme layout avoids mapped flood hazard areas.
	Designed to provide adequate resilience for the water management system.
Storms and Winds	Implement procedures to facilitate operational shutdown where required during extreme weather conditions.
	Ensure the selection, design, operation, and maintenance of plant and equipment meets required standards.
Risk Reduction Mechanism	Secure and maintain insurance for site assets and operations.

Future Reduction of GHG Emissions

- 9.53 The Applicant has implemented a company-wide Energy and Carbon Policy (refer to **Appendix 9-D**). This policy commits to operating in a manner that ultimately eliminates its contribution to global warming by mitigation of climate change impacts through industrial innovation and the application of industry best practice. Some of the more relevant commitments are presented below and indicate different measures that can be taken to lower the carbon footprint of the development:
- Create and maintain a robust energy and carbon data collection and reporting system, that provides the data required to assess performance, identify opportunities for progress and to deliver improvements in performance;
 - Set targets for the short and medium-term with a goal of achieving carbon neutrality by 2050;

- Monitor and measure performance regularly to ensure continual improvement and sharing of best practice;
- Report annual climate-related emissions data and ensure that the reported data is externally verified by a recognised, accredited body;
- Seek to reduce carbon emissions through optimizing energy efficiency and, where practicable, the use of alternative and renewable energy sources;
- Regularly audit operations for energy efficiency opportunities and implement cost-effective solutions; and
- Endeavour to transition operational fleets from traditional combustion engines to alternative forms of energy and, through collaboration with suppliers, make our fleets more efficient through new technology.

9.54 The wider Breedon Group also implement a Carbon Reduction Plan which commits to achieving Net Zero emissions by 2050. Details of this plan are included in **Appendix 9-C**.

9.55 In compliance with the Carbon Reduction Plan, the applicant will implement a GHG monitoring programme at Mounthall.

9.56 **Table 9-3** details specific mitigation measures for the site in respect of the GHG reduction programme.

Table 9-3 Mitigation Measures Related to GHG Reduction Programme

Main Concerns Related to:	Proposed Alternatives or Mitigation Measures
Energy - electricity supply	Consider using renewable energy sources / suppliers.
Direct GHG emissions	Use energy efficient machinery / energy, consider future use of electric plant & machinery where practical.
GHG emissions related to transport	Unnecessary equipment / transport journeys should be avoided by management of transport and travel demands. Equipment should not be left in un-necessary idling mode.
GHG mitigation training programme	Training programme for GHG mitigation to be provided for employees/ contractors.

Accidents, Malfunctions and Unplanned Events

9.57 Accidents, malfunctions, and unplanned events refer to events or upset conditions that are not part of any activity or normal operation of the proposed development planned by the Applicant. Even with the best planning and the implementation of preventative measures, the potential exists for accidents, malfunctions, or unplanned events to occur during the proposed extraction.

9.58 Many accidents, malfunctions and unplanned events are, however, preventable and can be readily addressed or prevented by good planning, design, emergency response planning, and mitigation. In terms of climate change impact, the following unplanned events could influence the local area:

- equipment malfunction;
- vehicle collision;
- accidental material spillages during transport; and

- accidental overflow of silt lagoons.

- 9.59 The proposed development has been designed to be located outside the designated flood zones, refer to the flood risk assessment provided in Chapter 7.
- 9.60 In relation to climate change, the impacts of any unplanned events are negligible.

Monitoring

Project Adaptation against Expected Climate Change Effects

- 9.61 A framework and set of indicators shall be developed to assess project preparedness for adaptation against climate change. Provision shall be made for a periodic review of plans and the allocation of reporting responsibilities for a regime to measure and evaluate progress on adaptation. This will be documented in the Environmental Management System (EMS).

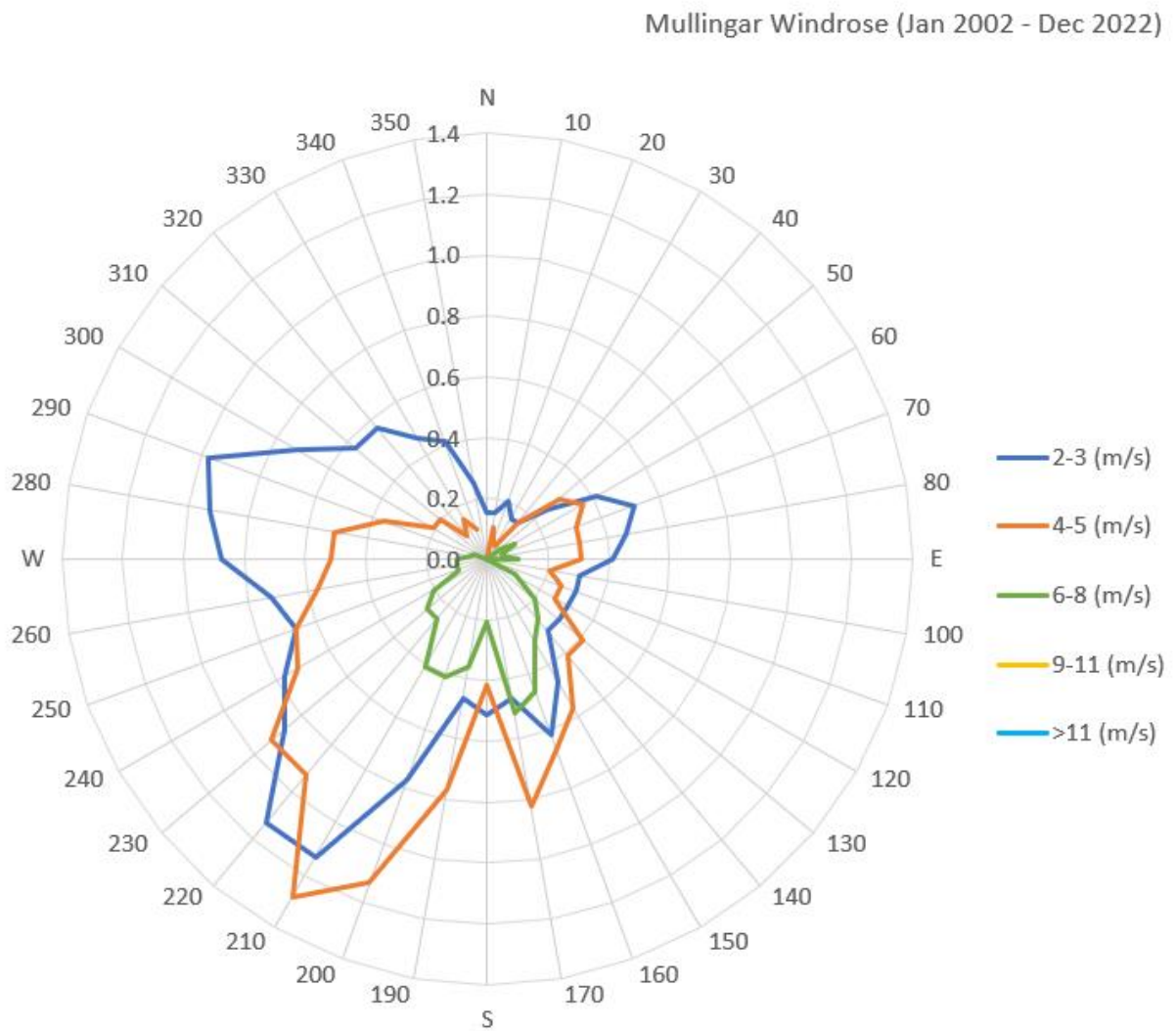
GHG Emissions

- 9.62 Monitor, report, and review progress in achieving GHG reductions at the site. This will be documented in the EMS.

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Figures

Figure 9-1 Windrose for Mullingar Meteorology Station



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Appendices

Appendix 9-A: Legislative Framework/Policy Context

Appendix 9-B: Development Vulnerability Assessment Methodology

Appendix 9-C: Development Vulnerability Assessment

Appendix 9-D: Breedon Energy & Carbon Policy Statement (2024)

Appendix 9-E: Breedon Carbon Reduction Plan (2023)

Appendix 9-A:

Legislative Framework/Policy Context

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Introduction

- 9.A.1 In recent years, there has been increasing public awareness about the implications of past, ongoing, and continued future emissions of greenhouse gases on the earth's climate. The implications of such change will potentially have significant impact on local communities and national populations across the world. The ever-increasing awareness and acceptance of this reality has, in recent years, prompted significant public policy development around emissions and climate change.
- 9.A.2 An overview of the legislative framework and policy context which informs this assessment of the potential climate impacts of the proposed development is presented herein below.

National Adaptation to Climate Change

- 9.A.3 The Irish National Policy Position establishes the fundamental national objective of achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050. It sets out the context for the objective; clarifies the level of GHG mitigation ambition envisaged; and establishes the process to pursue and achieve the overall objective. Specifically, the National Policy Position envisages that policy development will be guided by a long-term vision based on:
- 9.A.4 an aggregate reduction in carbon dioxide (CO₂) emissions of at least 80% (compared to 1990 levels) by 2050 across the electricity generation, built environment and transport sectors.
- 9.A.5 in parallel, an approach to carbon neutrality in the agriculture and land-use sector, including forestry, which does not compromise capacity for sustainable food production.
- 9.A.6 The evolution of climate policy in Ireland will be an iterative process based on the adoption by Government of a series of national plans over the period to 2050. Greenhouse gas mitigation and adaptation to the impacts of climate change are to be addressed in parallel national plans – respectively through National Mitigation Plans and National Climate Change Adaptation Frameworks. The plans will be continually updated, as well as being reviewed on a structured basis at appropriate intervals, and at a minimum, every five years. This will include early identification and ongoing updating of possible transition pathways to 2050 to inform sectoral strategic choices.
- 9.A.7 The Climate Action and Low Carbon Development Act 2015¹⁰ was enacted in December 2015. The Act identified and provided for the development and submission to Government of national mitigation and adaptation plans. It also established the institutional and governance framework within which these plans can be developed and implemented on a cyclical basis.
- 9.A.8 The Department of Communications, Climate Action and Environment (DCCAE) published a National Adaptation Framework (NAF) in January 2018¹¹. The NAF sets out the national strategy to reduce the vulnerability of the country to the negative effects of climate change and to avail of positive impacts.
- 9.A.9 The NAF builds on the work already carried out under the National Climate Change Adaptation Network (NCCAF, 2012). Under the NAF several Government Departments will be required to prepare sectoral adaptation plans in relation to a priority area that they are responsible for. Local authorities are required to prepare local adaptation strategies NAF

¹⁰<https://www.dccae.gov.ie/en-ie/climate-action/legislation/Pages/Climate-Action-and-Low-Carbon-Development-Act-2015.aspx>

¹¹<https://www.dccae.gov.ie/en-ie/climate-action/topics/adapting-to-climate-change/national-adaptation-framework/Pages/default.aspx>

also aims to improve the enabling environment for adaptation through ongoing engagement with civil society, the private sector and the research community.

- 9.A.10 The Climate Action and Low Carbon Development (Amendment) Act 2021 was signed into law by the President of Ireland on the 23rd of July 2021 enacting the pursuit of a higher level of climate action targets and ambition over the next decades including for the local government sector. The Act provides for approval of plans, by the government, towards achieving the National Climate Objective. The National Climate Objective refers to the transitioning of the country to a climate resilient, biodiversity rich, environmentally sustainable, and climate neutral economy by no later than 2050. The Act introduces the development of carbon budgets and sectoral emission ceilings covering successive five-year periods up to 2050. The Act states that carbon budgets for the purpose of achieving the National Climate Objective shall be proposed by the Climate Change Advisory Council and approved by government for a five-year period with new budgets introduced for each subsequent 5-year period thereafter. The first two carbon budget cycles will be aimed towards achieving a 51% reduction in greenhouse gas emissions by the end of 2030, using 2018 as the baseline year.
- 9.A.11 The Act also tasks the government with the development of a National Long-Term Climate Action Strategy, covering a minimum period of 30 years, and a National Adaptation Framework. The Long-Term Climate Action Strategy will be updated every 5 years taking account of how the country is progressing towards the National Climate Objective. Additionally, the government is required to update the Climate Action Plan 2019: To Tackle Climate Breakdown on an annual basis.
- 9.A.12 Within 12 months of the enactment of the Act, local authorities will be requested by the Minister to prepare and make Local Authority Climate Action Plans. These Plans are to highlight the mitigation and adaptation measures that will be adopted during the next 5-year period. Local Authority Climate Action Plans are to be consistent with the most recently approved Climate Action Plan and National Adaptation Framework and have regard for the most recently approved Long-Term Climate Action Strategy, the most recently approved Sectoral Adaptation Plans, the National Planning Framework, and any current Climate Change Policies. Local authorities are to cooperate with adjoining local authorities in the development of their Climate Action Plans. A further provision of the Bill provides that the Minister may issue guidelines in respect of the content and preparation of the local authority climate action plans and that local authorities shall comply with these guidelines.
- 9.A.13 The Climate Action and Low Carbon Development (Amendment) Act 2021 also included an amendment of Section 10(2) (n) of the Planning and Development Act 2000 whereby; to reduce anthropogenic greenhouse gas emissions as well as addressing adaptation requirements, County Development Plans will need to take account of Local Authority Climate Action Plans.

A.1.1 Sectoral Adaptation Plans

- 9.A.14 Under the National Adaptation Framework (NAF), Government Departments must prepare Sectoral Adaptation Plans. Twelve sectors under 7 Government Departments will prepare plans. The deadline for submitting plans to Government is 30 September 2019. The sectors are:
- Seafood - Department of Agriculture, Food, and the Marine
 - Agriculture - Department of Agriculture, Food, and the Marine
 - Forestry - Department of Agriculture, Food, and the Marine
 - Biodiversity - Department of Culture, Heritage, and the Gaeltacht
 - Built and Archaeological Heritage - Department of Culture, Heritage, and the Gaeltacht

- Transport infrastructure - Department of Transport, Tourism and Sport
- Electricity and Gas Networks - Department of Communications, Climate Action, and Environment
- Communications networks - Department of Communications, Climate Action, and Environment
- Flood Risk Management - Office of Public Works
- Water Quality - Department of Housing, Planning and Local Government
- Water Services Infrastructure - Department of Housing, Planning and Local Government
- Health - Department of Health.

9.A.15 The aggregate and extractive industries were not specifically required under the National Adaptation Framework (NAF) to prepare sectoral adaptation plans in line with the requirements of the Climate Action and Low Carbon Development Act.

9.A.16 Under the non-statutory 2012 Framework, four Government Departments prepared draft sectoral plans covering 5 sectors. These plans are:

- Sectoral Adaptation Plan for Flood Risk Management (OPW, 2015)
- Adaptation Planning - Developing Resilience to Climate Change in the Irish Agriculture and Forest Sector (DAFM, 2017)
- Adaptation Planning - Developing Resilience to Climate Change in the Irish Transport Sector (DTTAS, 2017)
- Adaptation Plan for the Electricity and Gas Networks Sector (DCCAE, 2017).

9.A.17 Government Departments must develop statutory sectoral adaptation plans in accordance with the NAF and with a six-step adaptation planning process described in Sectoral Planning Guidelines for Climate Change Adaptation. This Department published the guidelines for the use of the sectors required to prepare statutory sectoral adaptation plans under the Framework. The guidelines aim to ensure that a coherent and consistent approach to adaptation planning will be adopted by the key sectors in Ireland. Completed plans could include actions that:

- Integrate adaptation into key sectoral plans and policies
- identify and understand the key vulnerabilities, risks, and opportunities facing their sectors. This should include major cross cutting risks
- ensure that plans related to emergencies assigned to a sectoral department as lead Government department under the Strategic Emergency Planning Guidelines are climate proofed
- identify and collect information on the costs and benefits of adaptation within their sectors
- build capacity within their sectors to cope with climate change
- identify and address key research gaps within their sectors
- improve co-ordination with the local government sector
- develop appropriate monitoring and verification systems within their sectors.

A.1.2 Local Level Adaptation

9.A.18 The National Adaptation Framework identifies the critical role to be played by local authorities in addressing climate change adaptation. This will effectively build on their

existing expertise and experience as first responders in emergency planning scenarios. Under the NAF each local authority will also be developing their own adaptation strategies in line with guidelines developed for the sector. Local authorities had been set a deadline for the completion of local adaptation strategies of 30 September 2019.

- 9.A.19 The NAF explores how local authorities might adopt a joint or regional approach to adaptation planning. In January 2018 the DCCAE entered into a five-year financial commitment of €10m to establish four Climate Action Regional Offices (CAROs). Building on a business case prepared by the local government sector itself, this commitment recognises the significant obligation which has been placed on local government to develop and implement its own climate action measures, as well as the need to build capacity within the sector to engage effectively with climate change – both in terms of mitigation and adaptation.
- 9.A.20 The Climate Action Regional Offices are being operated by a lead local authority in four different regions that have been grouped together based on a climate risk assessment with a focus on the predominant risk(s) in each geographical area. The establishment of these offices will enable a more coordinated engagement across the whole of government and will help build on the experience and expertise which exists across the sector.

A.1.3 The Climate Change Action Plan 2021 (CAP 2021)

- 9.A.21 Published in November 2021 in line with the requirements of the Climate Action and Low Carbon Development (Amendment) Act 2021. This plan sets a roadmap for taking decisive action to halve Ireland's emissions by 2030 and reach net zero no later than 2050.
- 9.A.22 The Plan sets out indicative ranges of emissions reductions targets for each sector of the economy and actions to achieve these. In relation to local authorities, the Plan states:
- 9.A.23 The Climate Action Regional Offices will continue to play a central role in supporting and coordinating climate action by local authorities including developing capacity through training; supporting behavioural change initiatives; identifying and sourcing funding opportunities; and measuring and recording performance.
- Each local authority will prepare a Climate Action Plan at least once every five years, containing both mitigation and adaptation measures.
 - Each local authority will develop a decarbonisation zone within its administrative area that will become the focus for a range of climate mitigation, adaptation, and biodiversity measures.
 - This process will include the identification of projects and their associated outcomes that will contribute to achieving our national climate target.
- 9.A.24 **Table 9A-1** summarises the adaptation actions to climate change in Ireland.

Table 9 A-1 Summary of Adaptation to Climate Change Actions in Ireland

Item	Status	Programs
National Climate Adaptation Strategy	Legislation enacted. Statutory Framework adopted	Climate Action and Low Carbon Development Act 2015 National Adaptation Framework Climate Action and Low Carbon Development (Amendment) Act 2021
Action Plans	Sectoral Adaptation Plans in development.	Local Authority Adaptation Strategy Development Guidelines (2016)

Item	Status	Programs
	Local authority plans in development.	Sectoral Planning Guidelines for Climate Change Adaptation Local Authority Adaptation Support Tool The Climate Change Action Plan 2021
Impacts, Vulnerability and Adaptation Assessments	National Vulnerability Assessment	2012 National Climate Change Vulnerability Scoping Study Climate Change Impacts on Biodiversity in Ireland (2013) Climate change Impacts on Phenology in Ireland (2013) COCOADAPT (2013) 2013 HydroDetect Project Robust Adaptation to Climate Change in the Water Sector in Ireland (2013) Ensemble of Regional Climate Projections for Ireland (2015) Urb-ADAPT Sectoral Adaptation Plan for Flood Risk Management (OPW, 2015) Adaptation Planning - Developing Resilience to Climate Change in the Irish Agriculture and Forest Sector (DAFM, 2017) Adaptation Planning - Developing Resilience to Climate Change in the Irish Transport Sector (DTTAS, 2017) Adaptation Plan for the Electricity and Gas Networks Sector (DCCAIE, 2017)
Research Programs	EPA Research Programme (Climate Pillar)	http://www.epa.ie
Climate services / Met Office	Established	http://www.met.ie
Web Portal	Established	http://www.climateireland.ie
Monitoring, Indicators, Methodologies	In development	
Training, Education	Ongoing / in development	http://www.climateireland.ie

Regulation / Control of Greenhouse Gas Emissions

- 9.A.25 Ireland is a party to both the United Nations Framework Convention on Climate Change (UNFCCC) and the Kyoto Protocol, which together provide an international legal framework for addressing climate change.
- 9.A.26 In December 2015, an ambitious new legally binding, global agreement on climate change was agreed in Paris. The Paris Agreement aims to restrict global temperature rise to well

below 2°C above pre-industrial levels, and to pursue efforts to limit the temperature increase to 1.5°C. It aims to increase global ability to adapt to the adverse impacts of climate change and to foster climate resilience and low greenhouse gas emissions development, in a manner that does not threaten sustainable food production. It also seeks to achieve a balance between anthropogenic emissions by sources, and removals by sinks, of greenhouse gases in the second half of this century.

- 9.A.27 The first Irish National Mitigation Plan¹² represents an initial step to set us on a pathway to achieve the level of decarbonisation required. It is a whole-of-Government Plan, reflecting the central roles of the key Ministers responsible for the sectors covered by the Plan – Electricity Generation, the Built Environment, Transport and Agriculture, as well as drawing on the perspectives and responsibilities of a range of other Government Departments.
- 9.A.28 The measures that will be implemented through the plan will lay foundations for transitioning Ireland to a low carbon, climate resilient and environmentally sustainable economy by 2050. To support this ongoing work, the Plan also includes over 100 individual actions for various Ministers and public bodies to take forward.
- 9.A.29 Emissions reduction measures and actions set out in this National Mitigation Plan are aligned with and build upon commitments made in the 2015 Energy White Paper. This paper will be guided by the following strategic objectives:
- policy will contribute to reductions in Ireland's greenhouse gas emissions and enhancement of sinks in a manner that achieves the optimum benefits at least cost
 - a stable and predictable policy and regulatory framework will be underpinned by rigorous analysis and appraisal, supported by strong research and analytical capacity
 - the Government will pursue investment, innovation, and enterprise opportunities towards building a competitive, low carbon, climate-resilient and environmentally sustainable economy; and
 - the citizen and communities will be at the centre of the transition.

A.1.4 COP 26

- 9.A.30 The Glasgow Climate Pact (The Pact), the final agreement document of COP26 that was negotiated by nearly 200 countries. For the first time in a UN climate agreement, there is an explicit reference to coal and fossil fuel subsidies and a promise to increase aid to developing countries, who are bearing the brunt of climate change. The main outcome of COP26 was the agreement of the Glasgow Climate Pact, which includes the following:
- Agreement that the current NDCs, are inadequate to limit temperature rises to 1.5C, and a roadmap for more frequent revisions of NDC's starting at COP27 next year in Egypt,
 - Commitment to “phase down” coal-fired power generation. Unfortunately, this text was watered down from “phase-out”, at the last minute. Nevertheless, agreement on this was important.
 - Commitment to significantly increase funding for developing countries hardest hit by the effects of climate change.

A.1.5 Paris Agreement

- 9.A.31 The Paris Agreement which entered into force on 4 November 2016 aims to tackle 95% of global emissions through 188 Nationally Determined Contributions (NDCs) which will

¹² <https://www.dcae.gov.ie/en-ie/climate-action/topics/national-mitigation-plan/Pages/default.aspx>

increase in ambition over time. Ireland's contribution to the Paris Agreement will be via the NDC tabled by the EU on behalf of its Member States. This is a binding target for an overall reduction of at least 40% in greenhouse gas emissions by 2030 (relative to 1990 levels). The target will be delivered by the EU by 2030 through reductions in the Emissions Trading Scheme (ETS) and non-ETS sectors of 43% and 30% respectively (relative to 2005).

A.1.6 Kyoto Protocol (2008 – 2012)

- 9.A.32 The EPA has overall responsibility for the national greenhouse gas inventory in Ireland's national system, which was established in 2007 under Article 5 of the Kyoto Protocol¹³. The EPA's OCLR¹⁴ performs the role of inventory agency in Ireland and undertakes all aspects of inventory preparation and management as well as the reporting of Ireland's submissions annually in accordance with the requirements of Decision 280/2004/EC and the UNFCCC.
- 9.A.33 Ireland currently accounts for GHG emissions under the Kyoto Protocol. The Kyoto Protocol required Ireland to limit total national greenhouse gas emissions to 314.2 Mtonnes of CO_{2eq} over the five-year period 2008 – 2012 which is equivalent to 62.8 Mtonnes of CO_{2eq} per annum. The Kyoto Protocol limit is calculated as 13% above Ireland's 1990 baseline value which was established and fixed at 55.61Mtonnes of CO_{2eq} following an in-depth review of Ireland's 2006 greenhouse gas inventory submission to the UNFCCC.¹⁵

A.1.7 EU 2021-2030 Targets for non-ETS sector emissions- Effort Sharing Regulations¹⁶

- 9.A.34 Under the EU Commission's Climate and Energy Package, sectors of the economy not covered by the EU ETS must reduce emissions by 30% by 2030 compared to 2005 as their contribution to the overall target.
- 9.A.35 The non-ETS sectors cover those sectors that are outside the EU Emissions Trading Scheme and includes agriculture, transport, built environment (residential, commercial/institutional), waste and non-energy intensive industry.

A.1.8 2015 Energy White Paper

- 9.A.36 The White Paper on Energy Policy, Ireland's Transition to a Low Carbon Energy Future 2015-2030, published in 2015, sets out a framework to guide energy policy in the period to 2030. The White Paper recognises that a radical transformation of our energy system is required to meet our national, EU and international climate objectives and sets a course for an energy sector where the State will provide the supports that enable consumers to become active energy citizens. It posits a policy approach where our energy system will change from one that is almost exclusively led by Government and utilities to one where individuals and communities are agents of change in the way Ireland generates, transmits, stores, conserves and uses energy. It sets out a vision, a framework and over 90 actions for Irish energy policy up to 2030 as we transition to a low carbon society and economy by 2050.

Future Management of Flood Risk

- 9.A.37 The Catchment Flood Risk Assessment and Management (CFRAM) Programme¹⁷ (see www.cfram.ie) is the mechanism established to facilitate future adaptation to climate change. It provides for long-term flood risk management in Ireland and the embedment of flood risk assessment in the future development of capital projects. The future scenario

¹³ http://unfccc.int/kyoto_protocol/items/2830.php

¹⁴ <http://www.epa.ie/mobile/about/org/oclr/>

¹⁵ http://unfccc.int/files/national_reports/annex_i_natcom/submitted_natcom/application/pdf/nc6_br1_ire.pdf

¹⁶ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:32018R0842>

¹⁷ <https://www.cfram.ie/>

flood maps produced under the CFRAM Programme will facilitate this approach, inform other industrial sectors, and provide a valuable resource for local adaptation planning and sustainable land use management and planning.

EIA Directive 2014/52/EU

- 9.A.38 Directive 2014/52/EU¹⁸ of the European parliament and of the Council of 16 April 2014, amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment had to be transposed into national law by 16 May 2017, necessitating changes in laws, regulations, and administrative provisions across several legislative codes.
- 9.A.39 Key changes introduced in the 2014 Directive (in Annex IV - Information referred to in Article 5(1) – Information for the Environmental Impact Assessment Report) and the national transposing regulations (the European Union (Planning and Development)(Environmental Impact Assessment) Regulations, S.I. No. 296 of 2018) include a requirement for information on the impact of a project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change to be provided in the Environmental Impact Assessment Report.

Published Guidelines

A.1.9 Guidance on Integrating Climate Change and Biodiversity into EIA (EC, 2012)¹⁹

- 9.A.40 EU Guidelines provide recommendations on how to integrate climate change and biodiversity in Environmental Impact Assessment (EIA). The need for action on climate change and biodiversity loss is recognised across Europe and around the world. The guidelines include an explanation as to why climate change and biodiversity are so important in EIA, present the relevant EU-level policy background, provide advice on how to integrate climate change and biodiversity into selected stages of the EIA process. The annexes provide sources of further reading and links to other relevant information, data, and tools.

A.1.10 Assessing Greenhouse Gas Emissions and Evaluating their Significance (IEMA, 2017)²⁰

- 9.A.41 IEMA Guidance provides information to assist practitioners with addressing greenhouse gas (GHG) emissions assessment and mitigation in statutory and non-statutory Environmental Impact Assessment (EIA). It complements IEMA's earlier guide on Climate Change Resilience and Adaptation and builds on the Climate Change Mitigation and EIA overarching principles. The requirement to consider this topic has resulted from the 2014 amendment to the EIA Directive.

A.1.11 Climate Change and Major Projects (EC, 2016)²¹

- 9.A.42 This publication provides guidance for assessing vulnerability and risk from Climate Change for major projects funded by the European Regional Development Fund (ERDF) and the Cohesion Fund and listed in the concerned operational programmes.

¹⁸ <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32014L0052>

¹⁹ <http://ec.europa.eu/environment/eia/pdf/EIA%20Guidance.pdf>

²⁰ <https://www.iema.net/policy/ghg-in-eia-2017.pdf>

²¹ https://ec.europa.eu/clima/sites/clima/files/docs/major_projects_en.pdf

A.1.12 Sectoral Planning Guidelines for Climate Change Adaptation²²

9.A.43 The guidelines aim to ensure that a coherent and consistent approach to adaptation planning is adopted by the key sectors in Ireland. Sectors preparing sectoral adaptation plans under the NAF are required to prepare their plans in line with the process described in these guidelines while also being aware of the overall requirements regarding the development of sectoral adaptation plans.

A.1.13 Local Authority Adaptation Strategy Development Guidelines²³

9.A.44 Guidance was produced to provide a consistent and coherent process for local authorities in helping them develop local adaptation strategies and contain information on the process of developing an adaptation strategy:

- provide background information on what adaptation entails and provides the rationale behind implementing a local scale adaptation strategy
- outline the initial steps required in launching a strategy development process, describing key roles and who can fulfil them, and setting out important factors to consider in the early stages of strategy development
- explains how to assess the role that weather extremes and periods of climate variability currently play within the local jurisdiction, and it describes why doing so is a fundamental element of working towards a more climate-resilient future
- moves from the present to the identification of future climate risks, describing a staged risk assessment process and positioning the adaptation strategy within more detailed risk assessments undertaken during shorter term decision-making processes such as statutory plan-making
- based on the risk assessment process undertaken determination of adaptation goals and objectives and the types of adaptation actions that are available and outlines how each might be identified, assessed, prioritised and implemented is described
- outlines the steps required to move from a phase of planning to one of implementation, and it explains the importance of monitoring and evaluation in ensuring that the strategy is achieving its anticipated adaptation objectives.

²²<https://www.dccae.gov.ie/en-ie/climate-action/topics/adapting-to-climate-change/national-adaptation-framework/Pages/Sectoral.aspx>

²³<https://www.dccae.gov.ie/en-ie/climate-action/topics/adapting-to-climate-change/national-adaptation-framework/Pages/Localadaptation.aspx>

Appendix 9-B:

Development Vulnerability Assessment Methodology

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Development Vulnerability Assessment Methodology

9.B.1 The scale for assessing the likelihood of a climate hazard is presented in **Table 9 B-1**. The output of the likelihood analysis is an estimation of the likelihood for each of the essential climate variables and hazards.

Table 9 B-1 Scale of Likelihood of Climate Hazard

Term	Qualitative	Quantitative
Rare	Highly unlikely to occur	5%
Unlikely	Unlikely to occur	20%
Moderate	As likely to Occur	50%
Likely	Likely to Occur	80%
Almost certain	Very likely to occur	95%

9.B.2 The scale for assessing the potential impact of a climate hazard is presented in **Table 9 B-2**. The impact analysis provides an assessment of the potential impact of each of the essential climate variables and hazards.

Table 9 B-2 Example Table for Climate Hazard Impact Analysis

Risk Areas	Insignificant	Minor	Moderate	Major	Catastrophic
Asset damage, engineering, operational					
Safety and Health					
Environment					
Social					
Financial					
Reputation					

9.B.3 The matrix for assessing the sensitivity of project to climate hazards is presented in **Table 9 B-3**. The sensitivity is summarised, along with the ranking of the relevant climate variables and hazards relating to the project.

Table 9 B-3 Example Table for Sensitivity of Project to Climate Hazards

	Extreme rainfall, flood, flash flood	Heath	Drought	Wildlife Fires	Storms and winds	Landslides	Cold Spells and snow	Freeze –thaw damage	Rising sea levels
On site assets									
Inputs – Water									
Inputs - Energy									
Outputs - product									
Transport links									

9.B.4 The matrix for assessing exposure of a project to climate hazards is presented in **Table 9 B-4**. The exposure analysis ranks climate variables and hazards as low, medium, or high based on current and future climate.

Table 9 B-4 Example Table of Exposure of the Project to Climate Hazards

	Extreme rainfall, flood, flash flood	Heat	Drought	Wildlife Fires	Storms and winds	Landslides	Cold Spells and snow	Freeze –thaw damage	Rising sea levels
Current Climate									
Future Climate									

9.B.5 An example of the vulnerability of a project to climate hazards is presented in **Table 9 B-5**. The vulnerability combines the sensitivity and the exposure analysis.

Table 9 B-5 Example Table for Vulnerability Analysis of Project to Climate Hazards

Sensitivity	Exposure (Current & Future Climate)		
	Low	Medium	High
Low			
Medium			
High			

Appendix 9-C:

Development Vulnerability Assessment

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Development Vulnerability Assessment

- 9.C.1 The likelihood analysis of the proposed development to climate hazards is presented in **Table 9 C-1**.
- 9.C.2 The proposed development has been assessed to be moderate affected by extreme rainfall, flash (pluvial) flood, storms, and winds. The proposed development would be unlikely affected to cold spells, landslides, and snow. The proposed development would not be affected by heat, drought, wildlife fires and freeze –thaw damage. The proposed development will not be affected by rising sea level.

Table 9 C-1 Analysis of Likelihood of Climate Hazards

	Extreme rainfall, flash flood	Flood	Heat	Drought	Wildlife Fires	Storms and winds	Landslides	Cold Spells and snow	Freeze –thaw damage	Rising sea levels
Rare			✓	✓	✓				✓	✓
Unlikely		✓					✓	✓		
Moderate	✓					✓				
Likely										
Almost certain										

- 9.C.3 **Table 9 C-2** shows the climate hazard impact analysis of the proposed development. It was assessed that climate hazards will have major impacts on health and safety, the environment and financial areas, moderate impacts on asset damage and engineering, operational, social and reputation areas.

Table 9 C-2 Climate Hazard Impact Analysis

Risk Areas	Insignificant	Minor	Moderate	Major	Catastrophic
Asset damage, engineering, operational			✓		
Safety and Health				✓	
Environment				✓	
Social			✓		
Financial				✓	
Reputation			✓		

- 9.C.4 **Table 9 C-3** below assesses the sensitivity of the project to climate hazard. It was assessed that site assets, energy inputs and transport links are of high sensitivity to extreme rainfall, flood, flash floods, storms, and winds; water inputs will be highly sensitive to droughts. On site assets will be medium sensitive to cold spells and snow and freeze –thaw damage. Transport links will be medium sensitive to cold spells and snow.

Table 9 C-3 Sensitivity of Project to Climate Hazards

	Extreme rainfall, flash flood	Flood	Heath	Drought	Wildlife Fires	Storms and winds	Landslides	Cold Spells and snow	Freeze –thaw damage	Rising sea levels
On site Assets	High	Low	Low	Low	Low	High	Low	Med	Med	Low
Inputs - Water	Low	Low	Low	High	Low	Low	Low	Low	Low	Low
Inputs - Energy	High	Low	Low	Low	Low	High	Low	Low	Low	Low
Transport Links	High	Low	Low	Low	Low	High	Low	Med	Low	Low

- 9.C.5 In **Table 9 C-4**, the exposure of the planned development to climate hazards was assessed. In the current climate, the exposure of the development to extreme rainfall, flood, flash flood, storms and winds has been assessed to be medium. In the future, the development was assessed to have high exposure to rainfall, flash flood, storms, and winds.

Table 9 C-4 Exposure of the Development to Climate Hazards without Mitigation

		Extreme rainfall, flash flood	Flood	Heat	Drought	Wildlife Fires	Storms and Winds	Landslides	Cold Spells and Snow	Freeze –thaw damage	Rising sea levels
Current Climate		Medium	Low	Low	Low	Low	Medium	Low	Low	Low	Low
Future Climate		High	Low	Low	Low	Low	High	Low	Low	Low	Low

9.C.6 **Table 9 C-5** shows the vulnerability analysis of the project to climate hazards; it combines the sensitivity and the exposure analysis. The project was assessed to be most sensitive to extreme rainfall, flash flood, storms, and winds.

Table 9 C-5 Vulnerability Analysis of Project to Climate Hazards

Sensitivity	Exposure (Current & Future Climate)		
	Low	Medium	High
Low	Rising sea levels, Flood, Landslides, Freeze – thaw damage, Drought, Heat, Wildlife Fires		
Medium		Cold Spells and Snow	
High			Extreme Rainfall, Flash Flood, Storms, and Winds

Appendix 9-D:

Breedon Energy & Carbon Policy Statement (2024)

RECEIVED 19/09/2024

RECEIVED: 19/09/2024

Energy and Carbon

POLICY STATEMENT

MARCH 2024

*Sunrise at Solar farm
at Nauntun Quarry -
photo by Alex Light,
Quarry Management Trainee*

Energy and Carbon Policy Statement

We recognise that climate change is one of the greatest challenges currently facing humanity and we are committed to operating our business in a manner that ultimately eliminates its contribution to global warming by seeking to mitigate our climate change impacts through industrial innovation and the application of industry best practice.

To support our commitment, we will:

- comply with applicable legislation and regulations;
- create and maintain a robust energy and carbon data collection and reporting system, that provides the data required to assess performance, identify opportunities for progress and to deliver improvements in performance;
- set targets for the short and medium-term with a goal of achieving carbon neutrality by 2050;
- monitor and measure performance regularly to ensure continual improvement and sharing of best practice;
- report annual climate-related emissions data and ensure that the reported data is externally verified by a recognised, accredited body;
- seek to reduce carbon emissions through optimising energy efficiency and, where practicable, the use of alternative and renewable energy sources;
- regularly audit operations for energy efficiency opportunities and implement cost-effective solutions;
- use resources appropriately and sustainably and, where practicable, substitute primary resources with alternative materials;
- actively seek out partners for collaboration in order to further research and develop innovative solutions to reduce the climate change impact of our business;
- seek to develop products that contribute towards improved quality and sustainability in the built environment over their life cycle;
- communicate, through a transparent system of disclosure, our products' whole life benefits to allow our customers to deliver optimal, low-carbon solutions that help mitigate and adapt to climate change;
- engage with our suppliers and contractors to reduce impacts associated with the products and services we buy;
- actively engage with trade and public bodies to develop and implement good practice;
- endeavour to transition our operational fleets from traditional combustion engines to alternative forms of energy and, through collaboration with suppliers, make our fleets more efficient through new technology;
- actively seek to engage colleagues in carbon and energy efficiency;
- comply with the requirements of ISO 50001 at accredited sites.

The Board of Breedon Group is responsible for

- ensuring an overall energy and carbon policy is in place for the Group;
- overseeing the energy and carbon performance of each division within the Group;
- the adequate provision of resources and management arrangements to ensure the effectiveness of the policy.

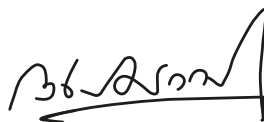
Each Business Director and Functional Head is responsible for:

- setting objectives and targets that relate to the significant energy and carbon aspects associated with the business and monitoring and reporting on their effectiveness through a programme of management review;
- ensuring that effective resources, arrangements, training and management controls to deliver these objectives and targets are established and implemented across the operations of the business;
- ensuring implementation, communication and compliance with all Group, legal and regulatory requirements at a local level.

It is the responsibility of everyone who works for the Company to:

- comply with this policy and its associated arrangements as an integral part of their day-to-day duties;
- identify and highlight potential opportunities to reduce energy consumption or to improve efficiency of Group operations.

We will bring this policy to the attention of our colleagues, supply chain partners and relevant interested parties; and review it on an annual basis.



Rob Wood, Chief Executive Officer
March 2024



Appendix 9-E:

Breedon Carbon Reduction Plan (2023)

RECEIVED: 19/09/2024

RECEIVED: 19/09/2024



CARBON REDUCTION PLAN

PPN-06/21

www.breedongroup.com

Carbon Reduction Plan

Supplier name: Breedon Trading Limited

Publication date: 20 May 2022

Latest Revision date: 31 October 2023

RECEIVED: 19/09/2024

Commitment to achieving Net Zero

Breedon Trading Limited is committed to achieving Net Zero emissions by 2050.

Baseline Emissions Footprint

Baseline emissions are the reference point against which emissions reduction can be measured.

Baseline Year: 2022

Additional Details relating to the Baseline Emissions calculations.

This Carbon Reduction Plan covers the activities carried out by Breedon Trading Limited, a subsidiary of the Breedon Group.

The original publication of this Carbon reduction plan used a baseline year of 2021, however in July 2022 Breedon Group formally committed to developing science-based targets aligned to the SBTi, and are in the process of developing these targets using a baseline year of 2022 (this was the first year that our Scope 1 and 2 emissions were subject to external verification).

As part of the process of developing new SBTi aligned targets, all Scope 3 categories were reviewed and an overstatement error was noted for the previous 2021 Category 4 – Upstream Transport and Distribution emissions.

Therefore, as part of the 2023 review process, the baseline for this carbon reduction plan has been updated to be 2022, thereby aligning our roadmaps and making our external messaging clearer and more transparent, and the Scope 3 Category 4 Upstream Transport and Distribution emissions have been corrected.

The methodology applied to our GHG emissions reporting is the 'Greenhouse Gas Protocol Corporate Accounting and Reporting Standard'. Scope 3 emissions reporting utilises the methodology outlined in 'The GHG Protocol - Corporate Value Chain (Scope 3) Accounting and Reporting Standard'. An 'operational control' approach has been taken in relation to the reporting boundary. All Scope 1 and 2 emission sources have been included within the baseline and targets, as have a sub-set of Scope 3 emission sources. Scope 2 emissions are reported as both location and market based. Scope 3 emissions categories included are: Category 4: Upstream Transport and Distribution, Category 5: Waste Generated in Operations, Category 6: Business Travel, Category 7: Staff Commuting, and Category 9: Downstream Transport and Distribution.

Baseline year emissions: 2022

EMISSIONS	TOTAL (tCO ₂ e)
Scope 1	154,731 tCO ₂ e
Scope 2	Location Based – 18,057 tCO ₂ e Market Based – 0 tCO ₂ e
Scope 3 (Included Sources)	80,839 tCO ₂ e (Upstream transportation and distribution, Waste generated in operations, Business travel, Employee commuting, Downstream transportation and Distribution)
Total Emissions	Location Based – 253,626 tCO₂e Market Based – 235,570 tCO₂e

RECEIVED: 19/09/2024

Current Emissions Reporting

Reporting Year: 2022

EMISSIONS	TOTAL (tCO ₂ e)
Scope 1	154,731 tCO ₂ e
Scope 2	Location Based – 18,057 tCO ₂ e Market Based – 0 tCO ₂ e
Scope 3 (Included Sources)	80,839 tCO ₂ e (Upstream transportation and distribution, Waste generated in operations, Business travel, Employee commuting, Downstream transportation and Distribution)
Total Emissions	Location Based – 253,626 tCO₂e Market Based – 235,570 tCO₂e

Emissions reduction targets

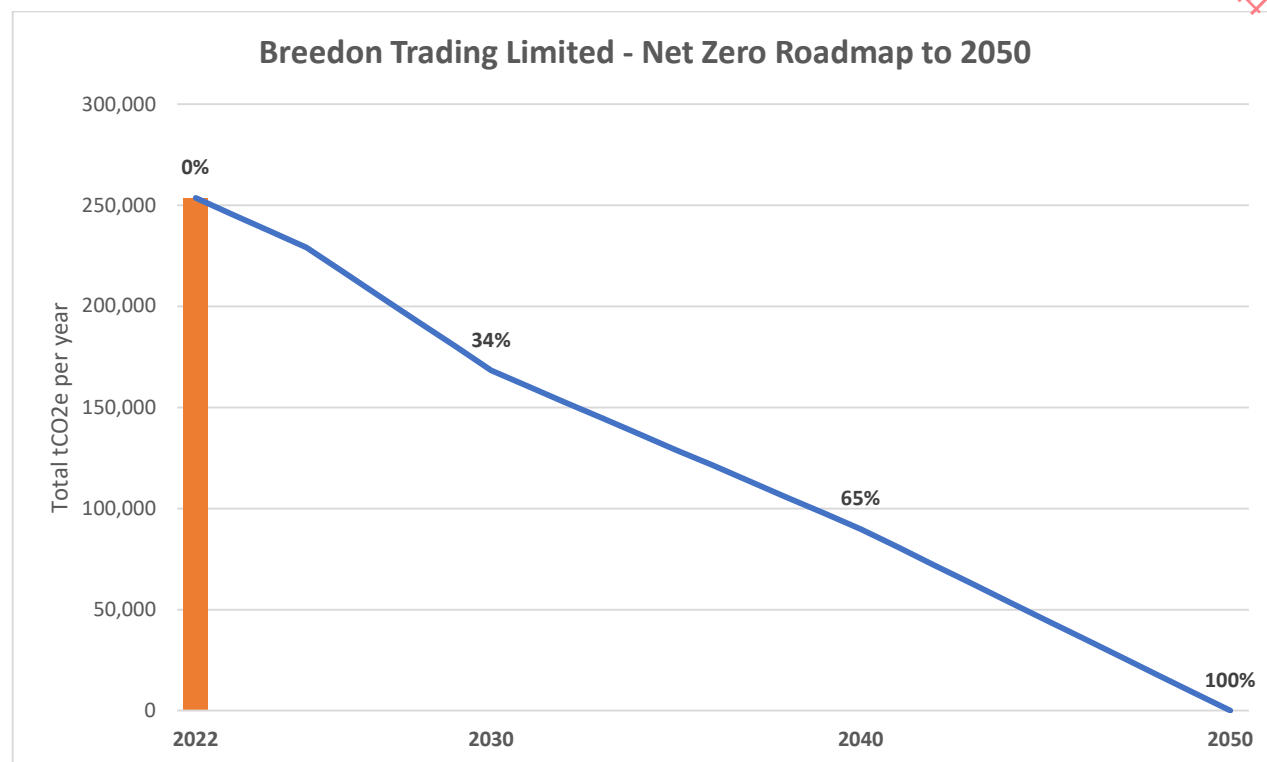
To continue our progress towards achieving Net Zero, aligned to the Science Based Targets 1.5°C warming pathway, Breedon Trading Limited has adopted the following targets for carbon reduction:

Scopes	2022 Baseline	2030 (SBTi near term target)	2040 (Extrapolated target)	2050 (SBTi net zero target)
Scope 1	100%	42%	70%	95%
Scope 2	100%	42%	70%	100%
Scope 3*	100%	16%	52%	95%
Total	100%	34%	65%	100% (Including Offsets)

*Scope 3 target not aligned with SBTi

By 2050 it is projected that emissions will drop to around 10,000 tCO₂e, with any residual carbon emissions subject to carbon credits generated through in-setting programmes or established local offsets as required to achieve our Net Zero target. These targets are based on the Location Based carbon emissions rather than Market Based approach, in the event that market conditions beyond our control may impact REGOs.

Progress against these total Scope 1, 2 and 3 targets can be seen in the graph below:



Data will be collated on an annual basis and the relevant GHG emissions calculated for that period using the methodology described above. Performance against the targets will be reviewed annually, the impact of carbon reduction measures assessed, the potential impact of future measures reviewed, and the potential to bring forward or improve any targets will be considered.

A re-baseline exercise will be undertaken if significant changes have been made to company structure, as described in the GHG Protocol Corporate Accounting and Reporting Standard e.g. significant company acquisitions or divestments. Re-baselining will also be undertaken if improvements in data collection/accuracy result in a significant change to the original data.

Carbon Reduction Projects

Completed Carbon Reduction Initiatives

The following environmental management measures and projects have been completed or implemented prior to the 2022 baseline.

- Following a Materiality Assessment Exercise in 2020, Breedon launched its Sustainability strategy in 2021, focussing on three key pillars of Planet, People and Places, underpinned by fundamental operating Principles to ensure we are a sustainable business.
 - The Planet pillar focusses on carbon and energy reductions, responsible resource use and waste reduction, and on creating a positive impact on nature and biodiversity.
 - The People pillar focusses on developing and empowering a diverse and talented workforce and creating a positive impact on the communities in which we operate.
 - The Places pillar focusses on our products and services to ensure they deliver higher performance, resource efficient buildings and resilient, low impact infrastructure, and collaborating and developing innovative solutions to help customers mitigate impacts of climate change.
 - Our underpinning Principles ensures a focus on safety, health and wellbeing; quality products and processes; ethics and integrity; on having a well governed, financially robust business; and stakeholder engagement.
- Targets and roadmaps are in place and performance against the strategic deliverables is monitored and reported externally in the Annual Report.
- In July 2022, Breedon formally submitted its commitment to develop science-based targets that aim to restrict global temperature rises to 1.5oC. These targets are currently being reviewed and have been incorporated into this carbon reduction plan.
- Breedon operates an environmental management system externally certified to the ISO 14001 Standard. The management system comprises of policies, standards and procedures to ensure that environmental impacts from our operations and value chain are understood and managed and that best practice controls are in place. The system is subject to robust internal audit through a dedicated internal auditing team, along with external verification.
- The majority of materials we produce also hold the BES 6001 Responsible Sourcing Standard.
- Work has been ongoing throughout 2023 to implement the ISO 50001 Energy Management Standard across all operational sites.
- Environmental Sustainability training developed in conjunction with the IEMA (Institute of Environmental Management and Assessment) has been rolled out from 2022.
- Increased the number of asphalt sites with the capability to use Reclaimed Asphalt Pavement (RAP), saving primary raw materials and reducing the amounts of bituminous binder required.
- 100% electricity purchased is from renewable source generation and covered by guarantee of origin certificates.
- Innovative materials and services offered to customers, including:

- Foam mix: On-site recycling of road surfaces into new roads, avoiding emissions from haulage to and from the work site and less primary raw materials.
- Warm-mix asphalt: Producing asphalt at a lower temperature to achieve energy and carbon savings whilst still retaining the performance and workability required by our customers.
- Innovative concrete designs: Collaborating with partners to develop alternatives to traditional concrete mix designs to offer positive environmental benefit in areas such as carbon reduction, increased use of recycled materials and reduced water demand.

In the future Breedon hopes to implement further measures such as:

- Increase the visibility of embodied carbon contents for our products to ensure our customers can make informed purchasing decisions.
- Further trials of low carbon alternative fuels and innovative technologies in our plant machinery and mobile equipment.
- Further rollout of onsite renewables across viable Breedon sites, focusing on rooftop/ground solar, wind and hydro-electric generation.
- Further investment in asphalt plant monitoring systems to monitor and minimise CO2 emissions.
- Further reduction of transportation and haulage impacts through specific targets for an all-electric business car and van fleet, and a roadmap for our internal haulage fleet towards electric / hydrogen.
- Focus on sustainable procurement processes.

Declaration and Sign Off

This Carbon Reduction Plan has been completed in accordance with PPN 06/21 and associated guidance and reporting standard for Carbon Reduction Plans.

Emissions have been reported and recorded in accordance with the published reporting standard for Carbon Reduction Plans and the GHG Reporting Protocol corporate standard¹ and uses the appropriate Government emission conversion factors for greenhouse gas company reporting².

Scope 1 and Scope 2 emissions have been reported in accordance with SECR requirements, and the required subset of Scope 3 emissions have been reported in accordance with the published reporting standard for Carbon Reduction Plans and the Corporate Value Chain (Scope 3) Standard³.

This Carbon Reduction Plan has been reviewed and signed off by the board of directors (or equivalent management body).

Signed on behalf of the Supplier:

A handwritten signature in black ink, appearing to read 'Mike Pearce', with a long horizontal line extending from the end of the signature.

Mike Pearce - Managing Director, Breedon GB Materials

Date: 03/11/2023

¹<https://ghgprotocol.org/corporate-standard>

²<https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting>

³<https://ghgprotocol.org/standards/scope-3-standard>