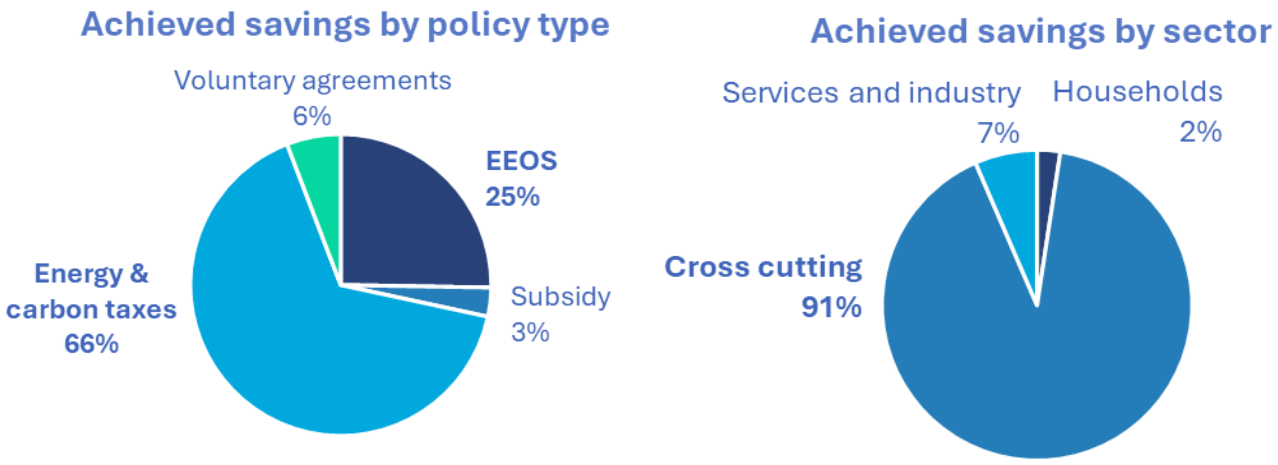
IRELAND

Background

National context, strategy, key measures and results in 2021

- **General strategy:** Alternative measures + EEOS
- **Baseline annual Final Energy Consumption**[1] (averaged over 2016-2018): 11 863 ktoe/year (source: NECP update)
- **Cumulative energy savings target for 2021-2030: 7 576 ktoe** (source: Department of Climate, Energy and the Environment, EEOS consultation (2025))
- **Achieved new annual savings** (all measures): **2021 = 277 ktoe; 2022 = 253 ktoe; 2023 = 294 ktoe** (source: NECPR 2025)
- **Distribution of cumulative savings achieved 2021-23**



Source: NECPR (2025)

Cross-cutting savings in the EEOS are largely in the industry sector.

[1] For more details about trends in energy consumption and energy efficiency, see the country profiles by ODYSSEE-MURE: https://www.odyssee-mure.eu/publications/efficiency-trends-policies-profiles/

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- **Top 5 policy measures**

Name of the measure	Sector	Main Policy type	%cumulative savings 2021-23
Carbon Tax	Cross-cutting	Tax	66%
EEOS	Cross-cutting	EEOS	25%
Non-residential bundle	Industry/services	Voluntary Agreement	6%
Residential bundle	Residential	Subsidy	2%
Public sector bundle	Public	Subsidy	1%

Source: NECPR (2025)

Key points, changes vs. 2014-2020 and other recent developments

Within the **EEOS**, the **residential sub-target decreased** from 20% to 10% of the overall EEOS target in 2023, while qualifying actions required **deeper energy savings** among a narrower set of choices. Shallower and broader residential actions remained eligible for the cross-cutting target. The 5% energy poverty target remained unchanged but also included stricter rules on qualifying actions, including the achievement of a minimum amount of energy savings among the **worst-performing homes** (rated D2 or worse), bringing them up to a good quality standard (at least B2).

A 2025 consultation on the future of the EEOS proposes adjustments to the 2023 EEOS including:

- an increase in the ambition of the EEOS (although it would deliver a smaller proportion of Ireland's revised target under the EED (2023));
- a relaxation to the criteria by which residential credits can be achieved (no longer requiring a minimum energy savings for actions with heat pumps or external wall insulation);
- changing the criteria by which energy poverty credits can be achieved (to a minimum energy saving, from the current requirement to find homes with poor energy performance (D2 to or lower) and improve them to a minimum performance of B2 or higher).

Focus on energy poverty

Increases to the ambition of existing measures and new measures are under consideration to respond to the challenges of meeting the EED (2023) energy savings obligation.

Energy poverty in the country: 9.85 %, calculated using the indicators set out in EED (2023) (source: Commission Guidance Note).

- **Art.8 policy measures targeting energy poverty:**

Name of the measure	Policy type	Cumulative 'EP' savings 2021-2023	% 'energy poverty' savings in the measure
Energy Efficiency Obligation Scheme	EEOS	15.3 ktoe	6%
Residential bundle (Warmer Homes, Warmth & Wellbeing Pilot, Better Energy Communities)	Subsidy	7.7 ktoe	32%

Source: NECPR2025

EEOS – Energy Efficiency Obligation Scheme

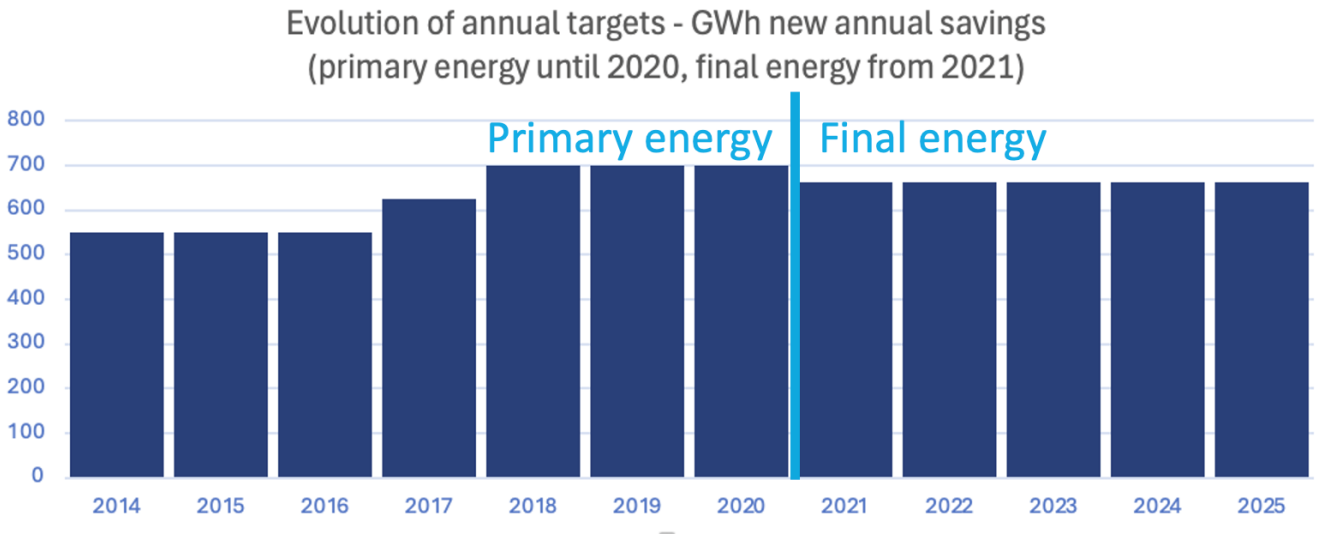
History

Starting year: 2014 **Latest revision**: 2023

Cumulative energy savings reported to Art.7 EED for 2014-2020: 1 185 ktoe (i.e. **45%** of Ireland's cumulative savings for 2014-2020)

Current target: 36 424 GWh (2021-2030) cumulative, equating to **662 GWh new annual savings per year**.

Expected contribution to 2021-2030 obligation for Art. 8 EED: 60% of EED(2019) obligation (41% of EED (2023) obligation before any future revision to EEOS target). Consultation open (in 2025) on increasing share of EED (2023) target to **45%**.



Key actors and roles

Public authorities:

- The **Department of Climate, Energy and the Environment** (DCEE) designs and enforces the rules of the scheme.
- The **Sustainable Energy Authority of Ireland** (SEAI) is the implementing body.

Obligated parties:

16 obligated parties (OPs) in 2025, covering energy suppliers and distributors selling more than 400 GWh of final energy per year of electricity, liquid fuels (including importers), natural gas and solid fuels.

- Where suppliers and distributors are involved in the sale of the same final energy, the party closest to the end-user is designated as the obligated party.
- Companies newly achieving sales above the threshold in year X are given their first target in year X+2.

Other key stakeholders: Measurement of energy savings must be carried out by a competent professional, e.g., a Certified Measurement and Verification Professional or Certified Energy Manager.

Target setting and allocation

Size: Target was set in the light of Ireland's energy savings obligation and the expected contribution of alternative measures.

Period: Multi-annual phase target. Targets are annual and accumulate over the course of the period, i.e., an OPs target in year 2 is roughly double its target in year 1.

Metric: First year new annual final energy savings (GWh).

Scope: Final energy consumption across all sectors.

Allocation rules: OPs targets are based on the energy content of final energy sales.

Sub-target related to energy poverty): Yes – 5% energy poverty sub-target.

Other sub-target(s): Yes – 10% residential sector target in addition to energy poverty sub-target.

Eligible actions

Eligible sectors: All sectors.

Eligibility criteria: Actions eligible for energy poverty credits must take place in a dwelling with a pre-works poor energy performance (Building Energy Rating (BER) D2 or worse) and be brought up to at least a B2 level. Eligible buildings for energy poverty actions must be owned either by a local authority. approved housing body or owner-occupier in a household in which at least one person is in receipt of designated welfare benefits. Actions eligible for residential credits must achieve a minimum energy efficiency improvement (90-100 kWh/m^2/year) and be coherent with a pathway to achieving a B2 rating (e.g., minimum thermal performance of installed insulation).

Possibility to cumulate EEOS support with incentives from other schemes: Yes – OPs can add support to subsidies from schemes across all sectors.

Standardised actions or methods: 27 standardised actions (as of 2024).

Non-standardised actions: Most commercial and industry sector actions use metered savings in line with the IPMVP approach.

Other eligible actions or programmes: No.

Incentives (including about tackling energy poverty) and restrictions

Uplifts / bonus related to energy poverty or priority group(s): No
Other uplifts / bonus / downgrades: None
Caps / maximum limits: None

Flexibilities

Trading: Bilateral trading allowed. OPs can also transfer targets to other willing OPs.

Banking and borrowing: OPs can borrow a limited amount from future years. Each OP must achieve at least 95% of each annual sub-target (except the final year, in which 100% must be achieved). Banking within the 2021-2030 period is unlimited.

Buyout price / substitution fee: Allowed. OPs can pay a buy-out fee up to a limit of 30% of each sub-target. The buy-out prices are intended to reflect the cost of achieving savings one year later through government-funded schemes and are set at 0.24 Euros / kWh for cross-sector credits, 0.69 Euros / kWh for residential credits and 2.19 Euros / kWh for energy poverty credits.

Evaluation, Monitoring & Verification

Materiality requirements: Standardised EEOS materiality templates include a homeowner waiver, for residential measures and a declaration of client organisation, for non-residential projects. Proxy evidence, such as a pre-works agreement, are also accepted by SEAI.

Additionality requirements: A factor of 0.91 is applied to building renovation actions to correct for the rebound effect. Deemed scores are only available for buildings built before 2011. Savings from lighting projects are only eligible if entire systems are redesigned (or if the lighting project is supported by an M&V report detailing how the system would evolve in the baseline). Electric vehicle savings are discounted over time to reflect increases in the efficiency of baseline vehicles. Randomised control trials are required before deemed scores can be introduced for behavioural actions. Scaled savings methods are developed considering the requirements of Annex V.

Calculation methods: There are 22 standardised actions available with different scores for apartments and houses and five for different types of electric vehicles. Scaled savings methods are also available for electric vehicles, lighting, pipe insulation and steam trap replacement. Most non-residential savings are calculated using metered savings.

Reporting and validation: OPs can report their data on savings (and other relevant data related to actions) on an ongoing basis through two online systems – the Project Evaluation Platform (PEP) for metered industry sector savings; and the Energy Credit Management System (ECMS) for other savings. For actions reported through the ECMS, a broader set of documentation must be retained in case further checks are carried out by SEAI. Actions reported through the PEP require a non-residential energy credits application and an M&V report to be submitted prior to allow SEAI to sort projects according to their level of risk.

Online platform to report actions: yes **Automatized checks**: yes

Progress monitoring: OPs target achievement is checked on an annual basis. Progress can be monitored through the online systems.

Other verifications and controls: Each OP must have a Quality Management System (QMS) aligned with ISO 9001: 2015, under which they must carry out independent and documented verification on a statistically significant and representative sample of all relevant qualifying actions implemented for the purpose of achieving its annual EEOS target, using competent experts. SEAI validates the savings, including technical evaluations, both onsite and desktop. SEAI also carries out regular audits of OPs' QMSs.

Data on verification and controls: No data are published. In practice, all actions ultimately pass, with some requiring corrective action. Among standardised actions, around half are deemed low risk, of which a sub-sample is audited. The other half get a full desk review of their M&V report and some get a site visit.

Evaluation(s) of the scheme: No evaluation has been published. Data on the latest annual achieved savings are published on the SEAI website: https://www.seai.ie/about/regulatory-functions/energy-efficiency-obligation-scheme/about-eeos.

Penalties

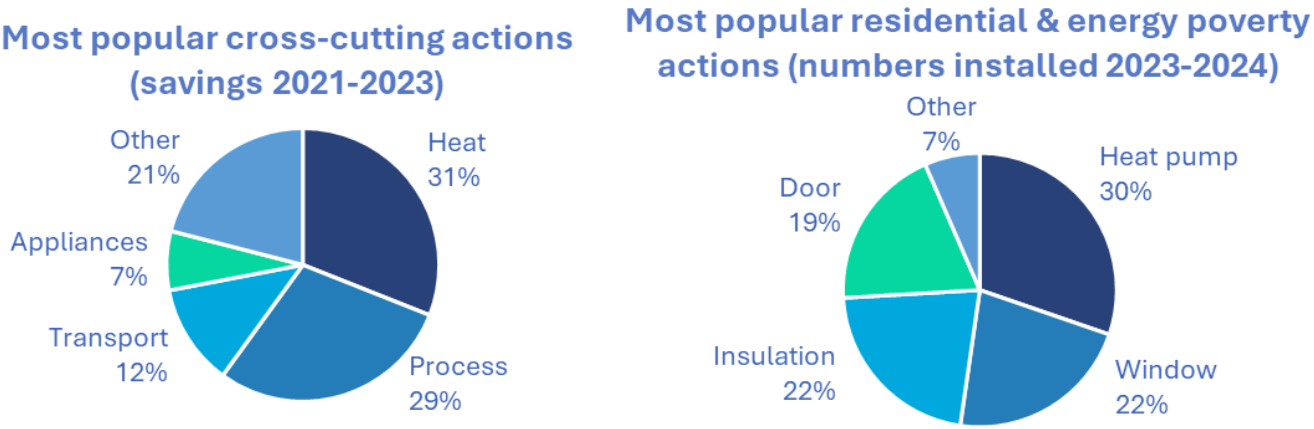
For missing target: The penalty for missing targets is either financial, set at 1.25 times the buy-out price for each sub-target, or in terms of an increase in sub-target equal to 1.25 of the under-compliance plus an amount that increases in proportion to both the size of the missing savings and proximity to 2030.

Full discharge: Yes. OPs that choose to pay the financial penalty are deemed to have fully compliant for the purposes of the following year's target. In relation to the actual target year where they had a shortfall that necessitated a financial penalty, they are deemed non-compliant.

Other penalties or sanctions: None.

Data on penalties or sanctions: No data are available.

Key results



Source: SEAI (2025). *EEOS Infographic*. https://www.seai.ie/sites/default/files/publications/EEOS-Infographic.pdf

Sources

Information about the EEOS can be found on the SEAI website:
https://www.seai.ie/about/regulatory-functions/energy-efficiency-obligation-scheme
The consultation on potential changes to the EEOS and supporting background report can be found on the Department of Climate, Energy and the Environment website:
https://www.gov.ie/en/department-of-climate-energy-and-the-environment/consultations/consultation-on-the-redesign-of-irelands-energy-efficiency-obligation-scheme/

Interview with Aileen Duffy (SEAI)

What is the general approach of Ireland to delivering the higher energy savings obligation for 2024-2030?

We continue to use both an EEOS and AMs. We are consulting on increasing the target for the EEOS and looking at increasing the ambition of current AMs. We have an ambitious carbon tax with an increasing trajectory to 2030. To date, many other alternative measures have been financial incentives in the buildings sector, but with the updated target we are looking at various policy types as well as expanding our efforts in sectors that we have not targeted as much in the past, e.g., transport, heavy industry and the water sector.

What is Ireland's approach to deliver energy savings among priority groups (cf. Article 8(3) EED)?

Since its start the EEOS has had an energy poverty sub-target of 5% of savings. Ireland also has a significant 100% grant funded scheme for owner-occupier households in energy poverty, part-funded by carbon tax receipts. We also have an ambitious energy efficient retrofit programme targeted at Local Authority homes, significantly upgrading their EPC ratings and involves community-based organisations in helping to identify and support priority group households engaging with our efficiency schemes.

The revised EED includes provisions in Annex V to progressively exclude energy savings from new fossil fuel technologies (for achieving the Article 8 target). Will these provisions have implications for the policy measures reported by Ireland?

Most of our policy measures already exclude energy savings from fossil fuel technologies, in line with our Climate Action Plan. None of our residential programmes support fossil boiler replacements, in line with the new requirements of the revised EED and EPBD.

What would be the main points you would like to highlight about implementation and achievements in recent years?

Across the range of policy measures, it is important to factor in all the requirements of Annex V at the earliest stage possible, making the measures stronger and helping to avoid administrative effort filling in gaps at a later stage. Ensuring that implementation bodies are fully on-board with the requirements of Annex V is also important.

What would be the main challenges you see for the coming years?

The significant increase in EED ambition will be challenging, given the cumulative nature of Article 8 targets and the time needed to identify cost-effective savings and put new and effective policy measures in place. This is particularly the case in the priority group sub-target, where Ireland was already a leading Member State and is proud of its energy poverty alleviation efforts.

If you could go back in time, what would you do differently?

Overall, Ireland has done a good job to date and has taken a strong approach on M&V and how policy measures are administered. We've seen that the introduction of One Stop Shops and the focus on deeper retrofit has had a real impact on savings per household, which would have been great to have accessed earlier.

Interview with Claire Valente (SEAI)

Have there been changes in the EEOS in recent years?

The main elements of scheme design have remained fairly constant since 2014. In 2021, OPs' targets changed from primary to final energy savings. In 2023, the size of the sub-target for the residential sector was changed to 10% plus 5% among energy poor households. Previously the sub-target had been 20%+5%. Under new rules in 2023, actions to meet the sub-targets had to achieve more stringent qualifying criteria (deeper savings and a focus on the worst-performing buildings). However, smaller actions still qualify for the cross-cutting remainder of OPs' obligations.

Did you see an impact of the energy prices crisis the EEOS?

The energy crisis made it more challenging for OPs to meet their targets, as many businesses had fewer funds to invest. Energy efficiency opportunities with medium-term paybacks became less attractive as companies worried about staying afloat. While not eligible under the EEOS, solar PV investment levels remained strong, perhaps because companies had more confidence that this would protect against rising energy prices. The impact of energy prices on general inflation also had an impact on the costs of energy efficiency actions.

What could be bottlenecks or drivers that could hinder or support the achievement of higher results?

In the residential sector, the ability to pair OP efforts with state subsidy schemes was a driver in the initial success of the One Stop Shop (OSS) policy measure. OPs set up many of the first OSSs to help meet their targets. This helped overcome potential supply bottlenecks following the announcement of new subsidy offers through the OSS policy measure.

Are there specific provisions to ensure the quality of the actions implemented?

OPs are required to be ISO9001 compliant (or have an equivalent quality management system). SEAI's EEOS Programme is also ISO9001 compliant. OPs are risk-rated on a biannual basis and representative samples of standardised actions are subject to desk study and site audits by independent inspectors. All savings from actions in the industry sector, with a few exceptions (lighting, pipe insulation, steam trap replacement, EVs) are measured and verified in accordance with ISO 50001 or IPMVP. Actions are treated using a risk-based approach. Low risk actions get automatic provisional approval (with random audits); high risk actions are fully reviewed.

How were the priority groups (or eligibility criteria) defined?

Energy poverty actions must be in homes that are either owned by a local authority (or approved housing body), or owner-occupied with at least one occupant in receipt of a welfare payment deemed eligible under an SEAI free energy upgrade scheme. To achieve energy poverty credits, the home must have a low *ex ante* energy performance score (D2 or worse) and reach a minimum *ex post* energy performance rating (B2 or above).

If you could go back in time, what would you do differently?

It would have been helpful to have moved to the current scheme rules in 2021, but COVID had a big impact on scheme delivery and administration meaning that the new rules came into effect in 2023.

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