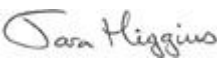




OFFICE OF ENVIRONMENTAL SUSTAINABILITY

ADDENDUM TO THE INSPECTOR'S REPORT ON LICENCE APPLICATION P1181-02

TO:	Director(s)	
FROM:	Barry O'Connor	Water, Energy & Business Support Programme
DATE:	16/04/2026	
APPROVAL:	This Report has been cleared for submission to the Board by Programme Manager Tara Higgins. Signed:  _____	
RE:	Application for an Industrial Emissions Licence Review, licence register number P1181-02 - Addendum to the Inspector's Report submitted to the Board on 09th December 2025.	
APPLICANT:	Amazon Data Services Ireland Limited	
CRO NUMBER:	390566	
LOCATION/ADDRESS:	Drogheda IDA Business And Technology Park, Donore Road, Drogheda, Meath.	
APPLICATION DATE:	24 September 2024	

A Recommended Determination (RD) and Inspector's Report (IR) were presented to the Board of the Agency on 09 December 2025. Following discussion, the Directors deferred a decision pending receipt of additional information. This Addendum Report should be read in conjunction with the original Inspector's Report dated 04 December 2025.

Additional Information Requested by the Board - Section 15 Climate assessment

The potential direct effects on climate from the proposed installation are from CO₂ emissions released from the combustion of liquid fuel (diesel) in the back-up generators. CO₂ emissions calculated by the licensee are based on the methodology described in the R.F.I. response dated 23 June 2025. The maximum fuel use from running up to 50 no. back-up generators for up to 100 hours per year is 3,920,915 litres diesel/annum.

The annual direct emissions of CO₂ eq. per annum from the installation that would arise from the activity, as applied for, range from approximately 1,682.6 tonnes CO₂ eq. (minimum) to 10,516 tonnes CO₂ eq. (maximum). The minimum levels relate to testing and maintenance of the back-up generators while the maximum levels are based on the back-up diesel generators operating for the maximum permitted duration of 100 hours per year. It must be noted that, to date, the back-up generators have not been used to power the installation, rather they have been used for testing and/or maintenance purposes only.

Indirect emissions of CO₂ arise from the installation's use of electricity from the national grid, if this electricity is generated from the combustion of fossil fuels. The installation is expected to use approximately 831,360 MWh of electricity annually, producing approximately 190,652 tonnes CO₂ eq./year. Under the EU Emissions Trading System (EU ETS), these indirect CO₂ emissions are reported at the original electricity generating plant. The carbon intensity of electricity in Ireland has fallen significantly in recent years, down from 375 gCO₂/kWh in 2018 to 254 gCO₂/kWh in 2023 and is predicted to decrease further to 100 gCO₂/kWh as a result of a potential increase in renewables to 70% of the electricity market by 2030.¹

In a worst case scenario, the total GHG emissions from the proposed development from both grid electricity use and the diesel generators running for a maximum of 100 hours (100 hours subtracted from grid emissions) would be 198,652 tonnes CO₂ eq./year. Overall, the proposed activity will result in a net increase in CO₂ emissions relative to P1181-01 alone which generates half the emissions at approximately 99,326 tonnes CO₂ eq./year. The impact of these direct and indirect emissions from the installation are considered significant.

The GHG emissions from the installation are considered 'moderate adverse' under the IEMA classification system.² The project's GHG emissions are partially mitigated but would not fully contribute to Ireland's decarbonisation trajectory in line with local and national policy goals for projects of this type.

It is noted that the Agency is prohibited under the IED from setting emission limit values on direct greenhouse gas emissions from industrial installations that are regulated under the EU ETS, unless necessary to ensure that no significant local pollution is caused. For the proposed installation, it is considered that no significant local pollution issues might arise as a result of GHG emissions that warrant a condition.

The following mitigation measures are proposed by the licensee:

- GHG permit

The EU ETS is the cornerstone of EU emissions reduction policy and an important mitigation mechanism for Member States' GHG reduction efforts. The licensee already participates in the EU Emissions Trading System with an existing GHG Emissions Permit GHG200-02 for the emergency back-up generators.

¹ ETS2 CO2 Emission Factors 2024 (EPA, 2025), ETS2 CO2 Emission Factors 2024 | Environmental Protection Agency

² The Institute of Environmental Management and Assessment (IEMA) 'Assessing Greenhouse Gas Emissions and Evaluating their Significance' (IEMA, 2022). This guide sets out a descriptive four-point scale of significance, ranging from "beneficial" to "major adverse" based on performance against net-zero standards.

Indirect emissions associated with the consumption of electricity are also covered by the EU ETS at the original electricity generating plant.

- Use of Best Available Techniques (BAT) / energy efficient design

Design of the installation is based on best available low-energy technologies to ensure that the buildings have the lowest energy usage possible as part of energy efficient management under the Schedule of Environmental Objectives and Targets. As conditioned in the RD, a feasibility study is to be provided to the Agency within 6 months to study opportunities for a limited amount of direct renewable energy production on-site, in the form of solar power, sustainable biofuels and other renewable energy options including energy storage.

- Potential to run off alternative supplies in the future

The installation already uses a blend of diesel and HVO in the onsite fuel tanks to power the back-up generators. After this is used up, the licensee proposes to move to low carbon 100% HVO. Sustainable biofuels, including HVO, meeting Renewable Energy Directive (EU) 2018/2001) (REDII), as amended, sustainability and GHG criteria, have a zero CO₂ emission factor under EU ETS. The RD includes various conditions around the use of HVO including meeting the CEN standard 15940, that it must comply with the requirements of the RED III in relation to sustainability and greenhouse gas emissions saving criteria for biofuels, that the licensee must identify opportunities to minimise the proportion of HVO sourced from food and feed crops and must incorporate this aspect into the Schedule of Environmental Objectives and Targets.

Section 15 assessment

The climate instruments referred to in s. 15(1) are assessed and discussed individually in the following sections.

(a) the most recent approved climate action plan

CAP 25, along with its predecessors, outlines the actions and strategies necessary to progress towards Ireland's goals of achieving a 51% reduction in GHG emissions by 2030 and reaching climate neutrality no later than 2050. CAP 25 includes a sectoral-based approach that specifies legally binding sectoral emissions ceilings. These set out the maximum amount of GHG emissions that are permitted in different sectors of the economy during a carbon budgetary period.

The direct GHG emissions from the installation arising from the combustion of diesel in the back-up generators fall under the 'Buildings (Commercial and Public)' sector. In the EPA's latest Greenhouse Gas Emissions Projections (2024-2055)³, under the 'With Additional Measures' (WAM) scenario⁴, this sector is projected to exceed its 2021–2025 ceiling of 7 Mt CO₂ eq. by 0.2 Mt CO₂ eq. It is projected that the 2026–2030 ceiling of 5 Mt CO₂ eq. will also be exceeded, with emissions projected to be 6.3 Mt CO₂ eq. The direct emissions from the installation (minimum 682.6 tonnes CO₂ eq. to maximum 10,516 tonnes CO₂ eq. annually) will contribute to these sectoral emissions.

The indirect emissions from the installation associated with the use of electricity from the grid (approximately 190,652 tonnes CO₂ eq. annually) fall under the 'Electricity' sector. In the EPA's latest Greenhouse Gas Emissions Projections

³ Ireland's Greenhouse Gas Emissions Projections 2024-2055, EPA (2025), [Ireland's Greenhouse Gas Emissions Projections 2024-2055](#)

⁴ The WAM scenario is a projection of future emissions based on implemented measures included in the WEM scenario plus additional planned measures that are under discussion (as per plans, programmes or other policy documents) and have a realistic chance of implementation in the future (e.g. by 2030).

(2024-2055)⁵, under the ‘With Additional Measures’ (WAM) scenario⁶, the Electricity sector is projected to exceed its 2021–2025 ceiling. The emissions from the installation will contribute to these sectoral emissions.

Mitigation measures proposed by the licensee include energy efficiency measures and operating under a greenhouse gas permit under the EU Emissions Trading System Directive as well as switching to 100% HVO.

(b) the most recent approved national long term climate action strategy

The Long-term Strategy on Greenhouse Gas Emissions Reductions, published in 2024, sets out indicative pathways beyond 2030 towards achieving carbon neutrality for Ireland by 2050. The Long-term Strategy serves as a link between shorter-term Climate Action Plans and Carbon Budgets and the longer-term objective of the European Climate Law and Ireland’s National Climate Objective. It focuses on nationwide structural changes, including rapid renewable energy expansion, building retrofits, sustainable transport, and reducing agricultural emissions. The Long-term Strategy is supported by the annual Climate Action Plans that update measures, actions, and sectoral targets each year (discussed under point (a) above). Collectively these plans and strategies provide a framework for achieving the national objective of carbon neutrality by 2050.

Direct and indirect GHG emissions from the installation and associated mitigation measures are detailed in other sections of this Addendum Inspector’s Report and are not repeated here to avoid unnecessary duplication.

(c) the most recent approved national adaptation framework and approved sectoral adaptation plans

The National Adaptation Framework, Planning for a Climate Resilient Ireland (2024) provides a whole of government and society approach to climate adaptation, designed to integrate climate risks (like flooding, heatwaves, and sea-level rise) into all policy areas. It requires 13 key sectors and all local authorities to develop, update, and implement plans that reduce vulnerability to a changing climate. The second round of Sectoral Adaptation Plans were published in November 2025. These are strategic documents designed to identify key climate risks and outline actions to improve the resilience of the relevant sectors (Transport, Energy, Health, Tourism, Agriculture, etc.) to a changing climate. Meath County Council published its most recent Climate Action Plan in 2024, “Meath County Council Climate Action Plan 2024–2029”.

Regarding the installation, the site was specifically identified for “high technology” within the Meath County Council 2017-2027 Development Plan. The location has therefore been determined by the local authority as being suitable for data centre development following detailed assessments carried out at plan level including strategic environmental assessment and strategic flood risk assessment. As detailed in the Inspector’s Report, the project has been granted planning permission by the local authority and An Coimisiún Pleanála. The Agency granted an IE licence for the installation on 08 Aug 2024 and the licensee subsequently applied for a licence review on 24 Sep 2024.

(d) the furtherance of the national climate objective

The national climate objective is outlined in the Climate Action and Low Carbon Development Act 2015 (as amended) as follows: “*The State shall, so as to reduce the extent of further global warming, pursue and achieve, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy (in this Act referred to as the ‘national climate objective’).*” Legally binding five-year carbon budgets

⁶ The WAM scenario is a projection of future emissions based on implemented measures included in the WEM scenario plus additional planned measures that are under discussion (as per plans, programmes or other policy documents) and have a realistic chance of implementation in the future (e.g. by 2030).

and sectoral emissions ceilings are required by the Act “for the purpose of enabling the State to pursue and achieve the national climate objective”. The sectoral emissions ceilings are discussed under point (a) above.

Mitigation measures proposed by the licensee include energy efficiency measures and operating under a greenhouse gas permit under the EU Emissions Trading System Directive as well as switching to 100% HVO for the emergency back-up generators.

(e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.

Ireland’s first carbon budget programme, comprising of three 5-year economy-wide carbon budgets, was approved by the Government in 2022⁷. The total emissions allowed under each budget are as follows:

- 2021-2025: 295 Mt CO₂ eq.
- 2026-2030: 200 Mt CO₂ eq.
- 2031-2035: 151 Mt CO₂ eq.

The carbon budgets are allocated across sectors by the sectoral emissions ceilings set out by the Climate Action Plan, discussed under point (a) above.

Mitigation measures proposed by the licensee include energy efficiency measures and operating under a greenhouse gas permit under the EU Emissions Trading System Directive as well as switching to 100% HVO for the emergency back-up generators.

Climate assessment conclusion

Is the activity proposed expressly prohibited by any relevant government policy, underpinned by legislation?

The proposed activity is not prohibited by any relevant government policy.

The Government Statement on the Role of Data Centres in Ireland’s Enterprise Strategy (July 2022) recognises data centres as core digital infrastructure for both Ireland’s and Europe’s digital economies, and for strengthening Ireland’s position as a strategic international location for IT services. Government policy seeks to facilitate the ‘twin transitions’ of digitalisation and decarbonisation of our economy and society.⁸

More recent policy updates, including the Government’s Large Energy User Action Plan published in January 2026 and the CRU’s Large Energy Users Connection Policy published in December 2025, recognise the role of data centres as an important pillar of Ireland’s digital economy and provide a framework to enable additional growth while requiring that new data centres and other large energy users must align with Ireland’s energy security and decarbonisation policy goals.

The licensed installation has a grid connection to power its full energy requirements. The licensee must carry out a feasibility study on the use of solar power, sustainable biofuels and other renewable energy options including

⁷ [Carbon Budgets 2022](#), Government of Ireland (2022)

⁸ Government Statement on the Role of Data Centres in Ireland’s Enterprise Strategy (July 2022)

energy storage. The licensee already uses a blend of diesel and HVO in their fuel tanks to power the back-up generators; after this is used up, the licensee proposes to move to 100% HVO.

Outside of normal operating conditions, the installation is first supplied with electricity by the on-site uninterruptable power supplies (UPSs) and then by some or all the on-site back-up generators. Outside of routine testing and maintenance, the operation of the back-up generators is typically only required in the event of a loss, reduction or instability of grid power supply; critical maintenance of power systems; or a request from the utility supplier to reduce grid electricity load. The RD includes limitations on the operation and testing/maintenance of generators, including that each generator must not be operated for more than 100 hours annually. In addition, the RD includes various conditions around the use of HVO as documented on page 4.

Would the local environment be protected if the conditions of an IE licence were complied with?

The Agency, in considering an application for a licence or the review of a licence, shall have regard to section 83 of the EPA Act. The Agency shall not grant a licence or revised licence unless it is satisfied that emissions comply with relevant emission limit values and standards prescribed under regulation. In setting such limits and standards, the Agency must ensure they are established based on the stricter of both the limits and controls required under BAT, and those required to comply with any relevant environmental quality standard.

The RD specifies the necessary measures to provide that the installation shall be operated in accordance with the requirements of section 83(5) of the EPA Act and has regard to the AA and EIA. The RD gives effect to the requirements of the EPA Act and has regard to submission made.

As detailed in the IR, the local environment will be protected if the conditions of the RD are complied with.

Are there measures in place to deal with GHG emissions such as an ETS permit?

Licensed installations that fall within in a category of activity under Annex I of the EU Emissions Trading System (EU ETS) "Combustion of fuels in installations with a total rated thermal input exceeding 20 MW" are required to obtain a GHG permit from the Agency under the ETS. The EU ETS is the cornerstone of EU emissions reduction policy, designed with climate-neutrality in mind, and is an important mitigation mechanism for all Member States' GHG reduction efforts. Article 8 of the ETS provides that, where installations carry out activities that are included in Annex I to the IE Directive, the conditions and procedures for the issuing of a GHG permit shall be coordinated with those for the issue of a licence for the IE activity.

The GHG permit does not set a limit on the quantity of CO₂ emitted by the installation. The regulated entity must monitor and report each year on all CO₂ emitted from the activity listed in the permit and surrender sufficient emissions trading allowances to cover the emissions of the previous calendar year and purchase allowances as required. The quantity of allowances made available on the market or by free allocation is controlled at EU level and is reducing each year in order to ensure that overall emissions from the ETS sector meet the EU targets.

The EU has established a binding target to reduce greenhouse gas emissions from sectors covered by the ETS by 62% by 2030, compared to 2005 levels (this includes including power generation, large industry and large data centres). Since 2005, ETS emissions have decreased by 49.7% or 11.14 Mt CO₂ eq.

The licensee participates in the EU ETS with an existing GHG Emissions Permit (GHG200-02) and, as such, the licensee must purchase and then surrender carbon allowances relative to its their emissions each year. The indirect emissions associated with the consumption of electricity from the grid are also covered by the EU ETS at the original electricity generating plant. On an EU wide basis, the ETS market in 2025 was approximately 1,212 million tonnes of CO₂ equivalent (CO₂ eq.) (stationary installations). The total direct and indirect emissions from the proposed installation at a worst-case scenario of 198,652 tonnes/year would represent approximately 0.016% of the total EU-wide ETS market.

In addition to the mitigation provided by the ETS, are there further mitigation measures proposed by the applicant?

The installation would incorporate:

Decarbonisation of energy supply through the use of HVO fuel for the back-up generators, when supply is available. Currently, the site uses a blend of diesel and HVO in the same fuel storage tanks. After this is used up, the licensee proposes to move to low carbon 100% HVO.

The installation will comply with both the Large Combustion Plant Commissioning Implementation Decision and Medium Combustion Plant Regulations and be in line with the BAT requirements set out in the BREF documents for Energy Efficiency. Design of the installation is based on best available low-energy technologies to ensure that the buildings have the lowest energy usage possible as part of energy efficient management under the Schedule of Environmental Objectives and Targets.

Does the project contribute to the need for infrastructure, economic and social progress and development?

As noted above, the Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy recognises data centres as core digital infrastructure for both Ireland's and Europe's digital economies, and for strengthening Ireland's position as a strategic international location for IT services. Ireland aims to attract the next generation of investment in sectors including Artificial Intelligence (AI) and data centres. Government policy seeks to facilitate the 'twin transitions' of digitalisation and decarbonisation of our economy and society and notes that these transitions can - and must be - complementary. IDA Ireland recognises data centres as a major source of foreign direct investment, highly skilled jobs, and corporation tax revenue.

Internationally the requirement for data centres is growing due to rising global demand for cloud-based data storage (driven largely by AI). Data centres provide for storage of information at a secure and reliable off-premises facility for minimal cost and complexity compared to the traditional forms of distributed, on-premises data storage systems. Europe's data centre capacity is, at present, predominately based in five key clusters, one of which is Dublin. Dublin has become a hub for hyperscale and co-location centres, given its success in attracting technology companies, temperate climate and large wind energy resources.

The site is located within the administrative area of Meath County Council, in an area zoned for the development of "high technology" in the *Meath County Development Plan 2017-2027*. Therefore, the development represents a planned approach. The project has been granted planning permission by the local authority and An Coimisiún Pleanála. Construction of the installation is underway. The Agency granted an IE licence for the installation on 08 Aug 2024 and the licensee subsequently applied for a licence review on 24 Sep 2024. As of 06 April 2026, the data centre building is near completion.

If the decision was to refuse, is it likely that the project would be developed elsewhere in Ireland or in another jurisdiction, potentially with higher associated emissions (displacement)?

The proposed data centre is nearly complete and will house banks of servers and technical hardware to allow the licensee's clients (individuals, businesses, and organisations) to store information at a secure and reliable off-premises facility for minimal cost and complexity compared to the traditional forms of distributed, on-premises data storage systems. Data centres are generally considered significantly more energy-efficient, per unit of computing power, than distributed on-premises servers due to economies of scale, superior high-density hardware utilisation, and advanced cooling.

The site is located within the administrative area of Meath County Council, in an area zoned for the development of “high technology” in the *Meath County Development Plan 2017-2027*. Therefore, the development represents a planned approach.

Given the increasing global demand for cloud-based data storage, if refused it is highly likely that a similar project would be continued elsewhere in Ireland or in another jurisdiction, where the emissions may be either higher or lower.

All things considered, where does the balance of consideration lie – in refusal or in grant?

Section 52(2)(e) of the EPA Act 1992, as amended, requires that the Agency shall, in carrying out its functions, ensure, in so far as is practicable, that a proper balance is achieved between the need to protect the environment (and the cost of such protection) and the need for infrastructural, economic and social progress and development.

As detailed in this Inspector’s Report, the local environment will be protected if the conditions of the Recommended Decision are complied with.

I have considered section 15 of the Climate Action and Low Carbon Development Act 2015 (as amended) and am satisfied that, in reaching the Recommended Decision to grant a licence, the Agency has, in so far as practicable, performed its functions in a manner consistent with that section.

IR Correction

During the Board meeting of 09 December 2025, the lead inspector informed the Board of an error within section 15.4.7 Climate of the Inspector’s Report regarding the Environmental Impact Assessment. The indirect emissions from the grid electricity used to power the Data Centre should be accounted for under the electricity sectoral emission ceiling, rather than combined with the direct emissions from the onsite generators which come under the Buildings (Commercial and Public) sector. The direct and indirect emissions from the project are discussed further in the Section 15 assessment in this Addendum Report.

Environmental Impact Assessment Directive – Reasoned Conclusion Update

I have reviewed the assessment in the Inspector’s Report and, taking into account the contents of this Addendum Report, I consider that the potential significant combined direct and indirect effects of the activity have been identified, described and assessed in an appropriate manner as respects the matters that come within the functions of the Agency.

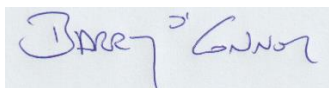
I consider that the monitoring, mitigation and preventative measures proposed in the Inspector’s Report will enable the activity to operate without causing environmental pollution, subject to compliance with the licence conditions included in the RD, with the inclusion of the changes proposed in this report.

Appropriate Assessment – Addendum Report Review

I have reviewed the Appropriate Assessment in the Inspector’s Report and, taking into account the contents of this Addendum Report, I am satisfied that the Inspector’s Report provides an adequate examination and evaluation of the effects of the activity on the European Sites concerned, River Boyne & River Blackwater SAC, Boyne Coast and Estuary SAC, Clogher Head SAC, River Boyne and River Blackwater SPA, Boyne Estuary SPA, River Nanny Estuary and Shore SPA and North-West Irish Sea SPA in light of their conservation objectives. Notification of the Connemara Islands (cSPA) Site Code 004159 was received from the NWPS on 04th February 2025, this was formerly the ‘Slynn Head to Ardmore

Point Islands SPA, Site Code 004159. This site will not have any effects on the activity on the European Site (or part of a site).

Signed

A handwritten signature in blue ink, appearing to read "Gregory Gannon", on a light blue rectangular background.

Inspector

Water, Energy & Business Support Programme