



Annual Environmental Report (AER) 2025

Company Name: Microsoft Ireland Operations Limited

Licence Number: P1187-1

Address: Microsoft Dublin Data Center Campus, Unit 75
Grange Castle Business Park, Nangor Road, Clondalkin,
Dublin

Class of Activity¹: 2.1 Energy

¹ See Appendix I

Purpose of this Report

One of the functions of the Environmental Protection Agency (EPA) is to licence and regulate the activities² of large scale industrial (e.g. chemical, food processors, power plants) and waste facilities. Submitting an Annual Environmental Report (AER) is a requirement of all EPA licences.

An AER is a public document. To this end, this format has been developed for industrial and waste licence holders (other than the intensive agriculture sector) to use as a template. This is to assist any member of the public to interpret and understand the environmental performance of the licensed facility.

The AER is a **summary** of environmental information for a given year. It includes:

- Details of the licence holder's environmental goals achieved, goals to maintain compliance and/or improve their environmental performance;
- Answers to questions regarding their facility's activities;
- Tables of results from monitoring emissions such as air, water, noise, and odour; and
- Details of waste generated, accepted and treated.

An AER does **not** provide detailed technical data. Such information is available in three ways:

- 1) Contacting the licence holder directly. The Contact Us section of this template enables the licence holder to provide details of where a member of the public can obtain further information on topics reported in this document.

² See Appendix I

- 2) Some documents³ are available on the EPA website via the licence details page for each individual licence. This can be found by browsing either the <http://www.epa.ie/licensing/> or <http://www.epa.ie/enforcement/> pages of the EPA website.
- 3) All formal enforcement correspondence exchanged between the EPA and a licence holder during the regulatory process is available for public viewing by appointment at any EPA Office.

If you have a question or query about an AER or an individual EPA licensed facility see the EPA's website or contact the relevant EPA office. See <http://www.epa.ie/about/contactus/> for contact details.

³ This includes EPA site inspection and compliance monitoring reports, licence holders' self-monitoring reports, AERs and special reports

Contents

Glossary	5
Declaration	8
1) Introduction	9
Contact Us	10
2) How we Manage our Facility	11
Environmental Management System	11
Beyond Compliance	14
3) Energy & Water	15
Energy	15
Water	18
4) Environmental Complaints	19
5) Environmental Incidents	21
6) Our Environmental Emissions	24
Storm Water	25
Waste Water	27
Air	31
Fugitive Solvent Emissions	36
Groundwater	37
Noise	39
7) Waste	41
Waste Generated	41
Waste Accepted	43
8) Financial Provision	44

Glossary

Abatement Equipment	Technology used to reduce pollution
AER	Annual Environmental Report.
Beyond Compliance	Beyond compliance is concept to help deliver greater organisational performance and long-term value for the environment, society and the economy.
CRAMP	Closure, Restoration and Aftercare Management Plan.
ELRA	Environmental Liability Risk Assessment.
Emission Limit Value	Limits set for specified emissions, typically outlined in Schedule B of an EPA licence.
EMS	Environmental Management System.
Environmental Goal	An objective or target set by a licensee as part of an environmental management system (EMS).
Environmental Pollutant	Substance or material that due to its quantity and/or nature has a negative impact on the environment.
Facility	Any site or premises that holds an EPA industrial or waste licence.
FP	Financial Provision.
GJ	Giga joules, an international unit of energy measurement.

Groundwater	All water which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.
Incident	As defined by an EPA industrial or waste licence.
Inert Waste	Is waste that will not undergo physical, chemical or biological change thereby, is unlikely to cause environmental pollution or harm human health.
List of Wastes (LoW)	A list of wastes drawn up by the European Commission and published as Commission Decision 2014/955/EU.
Noise Sensitive Location	Any dwelling house, hotel or hostel, health building, educational establishment, place of worship or entertainment, or any other installation or area of high amenity which for its proper enjoyment requires the absence of noise at nuisance levels.
Non-Renewable Resource	A resource of economic value that cannot be replaced at the same rate it is being consumed e.g. coal, peat, oil and natural gas.
Oil Separator	Separator system for light liquids (e.g. oil and petrol).
PRTR	Pollutant Release and Transfer Register.
Renewable Resource	Wind, solar, aerothermal, geothermal, hydrothermal and ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas and biogases.
Sanitary Waste	Waste water from toilet, washroom and canteen facilities.

Storm Water	Rain water run-off from roof and non-process areas.
Surface Water	Lakes, rivers, streams, estuaries and coastal waters.
Trigger Level	A value set for a specific parameter, the achievement or exceedance of which requires certain actions to be taken by the licence holder.
Volatile Organic Compounds	Gases produced from solids or liquids that evaporate readily in ambient conditions.
Waste	Any substance or object which the holder discards or intends or is required to discard.

Disclaimer

These are **not** legal definitions. Legal definitions can be found in the corresponding legislation.

Declaration

I, Garrett Prendiville, Critical Environment Programme Manager, confirm that by ticking the box below, all information in this report is truthful and accurate to the best of my knowledge and belief.

In addition, I confirm that all monitoring and performance reporting required by our EPA licence and summarised herein is available for inspection by the EPA.

Tick here

☒

1) Introduction

See below a brief description of our facility and a summary of our environmental performance this year.

The Microsoft Ireland Operations Ltd facility is a data storage installation located in Grange Castle South Business Park, Dublin 22. The site provides secure data storage and information distribution services to individuals, businesses, and organisations. The installation is licensed for the operation of back up generators and a standby gas generation plant under Industrial Emissions Licence **P1187 01**, which covers DUB14, DUB15, and the CAB administration building.

Outside of routine testing and maintenance, the backup generators operate only under emergency conditions—for example, loss or reduction of grid supply or instability arising from equipment failure. The standby gas generation plant can operate during peak demand periods 365 days per year, in line with the utilities flexible demand policy.

As of January 2025, a portion of the gas plant has been handed over and is available to support live load at the DUB15 Data Centre. The remainder of the DUB15 site remains under construction and commissioning. The CAB administration building, co-located with DUB14 and DUB15, became operational in March 2025.

This Annual Environmental Report (AER) presents the environmental performance for the reporting period 1 January 2025 to 31 December 2025. A summary of performance during 2025 is provided below:

- Energy consumption at the installation is predominantly from purchased electricity.
- Emergency back up generators utilise Hydrotreated Vegetable Oil (HVO) or Natural Gas (NG) when operation is required.
- No environmental complaints were received during the reporting period.

- 2 minor environmental incidents occurred during 2025.
- Stormwater sampling was completed in 2025, providing a representative dataset to propose appropriate trigger values, submitted in Oct 2025
- A technical amendment to the license submitted in 2025 to relocate wastewater emission point SE1-1 to capture process wastewater only was approved in March 2026. Wastewater discharge monitoring in 2025 was impacted by the incompatibility of the wastewater ELV's as set out in the licence with the specified monitoring location SE1-1 at SE-1 the overall foul water discharge from site.
- Attended noise monitoring was conducted in Q4 2025. Results confirmed that site specific noise levels attributable to activities within the IEL boundary remained within the emission limit values specified in the licence.
- A total of 42.091 tonnes of hazardous and non hazardous waste was generated at the installation, with a recovery rate of 88.17% for the reporting period.

Contact Us

If you have any questions or would like further information on any aspect of our licensed activity, please contact us directly.

See below details:

Garrett Prendiville – Critical Environment Operations Manager
Email: Garrett.Prendiville@microsoft.com

2) How we Manage our Facility

Environmental Management System

Explanation

To ensure our facility's activities do not cause environmental pollution we are required to have detailed documentation systems in place to help us manage and track our environmental performance. These systems are referred to as Environmental Management Systems (EMS). We review our EMS every year and set up-to-date **environmental goals** to continually improve our environmental performance.

The information below sets out the environmental goals for our facility to help us prevent environmental pollution and reduce our impact on the environment. Target dates for completing each goal and progress towards achieving the goal are outlined in Table 1.

Table 1 Environmental Goals

Environmental Goal	Target Date	Progress
Heat Recovery Project DUB15	2026	In progress, to be commissioned in mid-2026
EU Code of Conduct on Data Centre Energy Efficiency	2026	In Progress across EMEA regions
Achieve ISO14001 accreditation in line with EMS requirements for IE License P1187-01	April 2026	In Progress, Stage 1 Audit completed and stage 2 scheduled for April 2026
Support Microsoft's corporate goal to become Carbon Negative by 2030	2030	In Progress

Contribute to Microsoft's commitment to be 100% Renewable Energy for datacentres globally.	End 2025	Completed
Support Microsoft's goal to achieve Water Positive by 2030 through on-site water conservation initiatives.	2030	In Progress
Maintain certification of Microsoft ISO 50001 Energy Management System across the Dublin campus.	Annually	Complete
Implement energy efficiency measures to support the 2030 corporate energy intensity reduction target.	2030	In Progress
Ensure HVO supply chain to full RED II-compliant HVO Static fuel (with valid POS certificates).	December 2026	In Progress
Enhance site Biodiversity Programme aligned with Microsoft's global "Net Biodiversity Positive" ambition. Creation of a biodiversity logging/sighting form for all staff to contribute towards	December 2026	In Progress – Habitat enhancements, pollinator initiatives and landscape management in place.
Increase awareness and training on correct waste segregation for campus operations (Continuous Improvement).	December 2026	In progress
Contribute to Microsoft's Zero Waste by 2030 target by increasing diversion from landfill and improving campus-wide waste segregation performance	2030	In Progress

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Comment

An Environmental Management System (EMS) has been developed for the site and is being implemented. The EMS will continue to be expanded and enhanced with the objective of achieving ISO 14001 certification, with a Stage 2 certification audit scheduled for April 2026. Certification to ISO 50001 is maintained on an ongoing basis. Continued registration with the EU Code of Conduct on Data Centre Energy Efficiency is also maintained. The site training programme was expanded during 2025 to include additional environmental training modules aimed at enhancing staff competency. Environmental training is delivered on an ongoing basis in line with continual improvement principles.

The site's zero-waste programme aims to achieve a minimum of 90% diversion of operational waste from landfill across the data centre campus. Performance under this programme is subject to ongoing monitoring and is verified through internal audits and external quality assurance processes. As no environmental incidents or environmental complaints were recorded at the site during the 2025 reporting period, no new environmental objectives were required to be established in response to incidents or complaints.

Beyond Compliance

Explanation

We are legally required to comply with our environmental licence. However, the EPA realise that some sites go further than just complying with their environmental licence requirements. Some projects carried out at facilities can have long term positive impacts on the environment and local communities.

The EPA's beyond compliance initiative is encouraging us to identify and report on these environmental and sustainability projects. For example, the project could involve renewable energy, biodiversity, water conservation or exemplar community engagement.

Did any project completed on your site in the reporting year go beyond your licence requirements?

Yes ☒

No ☐

If yes, provide details of one case study in Appendix III that demonstrates how the project went beyond compliance of your licence.

3) Energy & Water

Energy

Explanation

Fossil fuels such as coal, gas and oil are non-renewable resources. As a result, our EPA licence requires that we measure our energy use and set targets to improve the energy efficiency of our activities and reduce our overall use, where possible. Where we have the means and technology on-site to generate energy, this is also captured in this report.

The information below summarises the energy used this year compared to the previous year and includes renewable and non-renewable energy types.

Table 3 Energy Used

Energy Used	Quantity (GJ)	% Increase/ decrease on previous year
Electricity	815,234.15	+103.22%
Heavy Fuel Oil		
Light Fuel Oil		
Natural Gas	4,480.61	N/A
Coal / Solid Fuel		
Peat		
Renewable Biomass	2,480.20 (HVO)	+38.23%
Renewable Energy Generated On-site		
Total Energy Used	822,194.96	+104.05%

Comment

Electricity consumption increased from 401,152.62 GJ in 2024 to 815,234.15 GJ in 2025. This increase reflects the continued expansion and normalisation of operations across the Dublin data centre campus rather than a deterioration in energy performance. During 2025, DUB14 became

fully loaded across the colocation (COLO) IT environment, significantly increasing the installed and utilised IT load relative to the previous year. In parallel, DUB15 continued to progress through phased deployment and commissioning across COLO spaces, contributing additional baseline electricity demand as capacity was brought online. Furthermore, the CAB building became fully operational during the reporting period, transitioning from partial or commissioning-phase operation to steady-state use. Collectively, these developments resulted in a higher overall electricity demand when compared to 2024 and are consistent with the planned growth of campus operations and service delivery requirements.

Natural Gas was not used on site in 2024 and therefore a % change in use is not applicable.

HVO consumption increased by 104.05% to 2,480.20 GJ in 2025. The increase in 2025 reflects the ongoing commissioning of the site, whereas HVO use in 2024 represented partial operation of the site only.

The information below summarises the energy we generated on our site this year with specific focus on renewable energy generation.

Table 4 Energy Generated

Energy Generated	Quantity (GJ)	% Increase/ decrease on previous year
Renewable Energy	-	-
Total Energy Generated	-	-

Comment

No renewable energy is generated on site.

Water

Explanation

Water is a natural resource and we are required by our EPA licence to identify ways to reduce our use where possible. Water used in industry can be extracted from groundwater, rivers and lakes (surface water), taken from public water supplies (Irish Water), recycled from the facility's processes or harvested from rainwater.

The information below summarises and compares the quantity of water used this year compared to the previous year.

Table 5 Water Used

Source of Water Used	Quantity (m³/year)	% Increase/decrease on previous year
Groundwater		
Surface Water		
Public Supply	2919.50	+80.52%
Recycled Water		
Rainwater	480	-97.6%
Total Water Used	2919.50	+80.52%

Comment

Water usage increased from 1,617 m³ in 2024 to 2,919 m³ in 2025. This rise was primarily driven by the commencement of the Central administration building (CAB) which has full catering facilities. There has been a decrease in rainwater used in 2025 due to the completion of the overall water treatment system located in DUB14. There was additional demand for harvested rain water at the water treatment facility in 2024 due to commissioning and system testing.

4) Environmental Complaints

Explanation

Our EPA licence requires that activities do not cause environmental nuisance such as odour, dust or noise. Our licence also requires that we have procedures in place to record, investigate and respond to environmental complaints if or when they arise.

We have an environmental complaints procedure in place where you can contact us⁴ directly. You can also contact the EPA⁵ if you wish to make an environmental complaint, confidentially or not.

See the information below for a summary of **all** the environmental complaints relating to our activities made directly to us and to the EPA this year.

Table 6 Summary of All Environmental Complaints Received in

Type of Complaint	Number of Complaints	Number Closed
Odour / Smells	-	—
Noise	—	—
Dust	—	—
Water Quality	—	—
Air Quality	-	-
Waste	-	-
Litter	-	-
Vermin/Flies/Birds	-	-
Soil Contamination	-	-
Vibration	-	-
Other	-	-

⁴ See Section 1, Introduction – Contact Us

⁵ If you wish to contact the EPA to make an environmental complaint about an EPA licenced facility, please go to <https://lema.epa.ie/complaints>

Comment

No environmental complaints were recorded in 2025.

5) Environmental Incidents

Explanation

It is our responsibility as an EPA licensed facility to ensure we have systems in place to prevent incidents that have the potential to cause environmental pollution. If an incident occurs, we are required to report it to the EPA, investigate the cause and fix the problem.

The EPA classify environmental incidents into 5 categories based on the potential impact on the environment:

- Minor
- Limited
- Serious
- Very Serious
- Catastrophic

See Table 6 for the number of the environmental incidents we reported to the EPA this year.

Table 7 Number of Environmental Incidents

Incident Category	Minor	Limited	Serious	Very Serious	Catastrophic
Abatement Equipment Offline	-	-	-	-	-
Breach of Ambient ELV	1	-	-	-	-
Breach of Emission Limit	-	-	-	-	-
Explosion	-	-	-	-	-
Fire	-	-	-	-	-
Monitoring Equipment Failure	-	-	-	-	-
Odour	-	-	-	-	-
Spillage	-	-	-	-	-
Breach of trigger Level	-	-	-	-	-
Uncontrolled Release	1	-	-	-	-

Incident Category	Minor	Limited	Serious	Very Serious	Catastrophic
Other	-	-	-	-	-

Comment

Two environmental incidents were recorded in 2025.

- Incident INCI031015 concerns ongoing exceedances from June 2025 of the ELVs for Biochemical Oxygen Demand, Chemical Oxygen Demand, suspended solids, and pH at wastewater monitoring point SE-1. Following the completion of an investigation report, an agreement with Uisce Éireann has been reached to move the monitoring location to a more suitably appropriate location on site. The exceedances detected and reported in 2025 are attributable to the monitoring of combined foul wastewater at SE-1, rather than process wastewater alone. These results have been addressed through the approved technical amendment to P1187-01.
- Incident INCI031727 concerns the uncontrolled release of F-GAS (R513A) from a refrigeration unit due to a fault within the refrigeration plant at the CAB building. The impact to the environment was the release of 54,897 kg CO₂eq of F-Gas to the atmosphere. Once the fault was discovered, the unit was taken off line for repair, testing, and recertification.

Further details can be found at <https://leap.epa.ie/>

6) Our Environmental Emissions

Explanation

We are required to ensure the emissions from our activities do not cause environmental pollution.

We are required to monitor any of the following emissions that we make:

- Storm water
- Waste water
- Air
- Groundwater
- Noise

We regularly test any such emissions for specific pollutants and materials to ensure they do not contain levels of pollution that exceed emission limit values (ELVs) or cause environmental pollution. If monitoring of an emission indicates an ELV is exceeded, we are required to report this to the EPA⁶.

The next sub-sections of this report summarise our compliance with any ELVs set in our EPA licence. Some emissions monitored do not have specific ELVs, but we still carry out monitoring and report all incidents that may give rise to environmental pollution.

⁶ See section 5, Incidents

Storm Water

Explanation

Storm water is rain water run-off from roof and non-process areas of a facility, e.g. car parks, and generally shall not contain any pollution.

Storm water is usually released into a local water body after a basic form of treatment. Our EPA licence requires that we manage storm water to ensure no polluting substances or materials are released into the environment.

The information below summarises how the storm water from our facility is treated, where it is released and the results of monitoring this year.

1. Storm water from our facility is managed prior to release by;

Stormwater is diverted to an attenuation tank. Prior to entering the attenuation tank stormwater passes through three class one full retention fuel separators with carbon monitors and lockdown valves. There is a hydrobrake flow control device at the outfall from the attenuation tank that limits discharge to 21.6l/s. A series of lockdown valves across the site can intercept runoff in the event of a fire or major spill.

2. Storm water from our facility is released into the following water bodies:

River Griffeen (from emission point SW1)

Table 8 Summary of Storm Water Monitoring

Parameter measured	No. of Samples	% Compliant⁷	Comment
pH	51	N/A	Trigger level to be determined
Total Organic Carbon	51	N/A	Trigger level to be determined
Temperature	51	N/A	Trigger level to be determined
Conductivity	51	N/A	Trigger level to be determined

Comment

Storm water was monitored weekly on site for pH, TOC, temperature and conductivity, as well as daily visual inspections of the storm water.

Under the site's licence there are no ELVs for storm water emissions, however proposed suitable trigger levels have been determined based upon monitoring data from 2024 and 2025 and EPA guidance. A Trigger Levels report was submitted to the EPA for approval in October 2025, which detailed the proposed trigger levels for the site.

⁷ % compliant = [(number of samples compliant) / (number of samples taken)] x 100. Compliance could refer to emission limit values or trigger levels. The EPA commonly use trigger levels on stormwater discharges.

Waste Water

Explanation

There are two types of waste water that can be produced:

- Process waste water produced from the activities and;
- Sanitary waste water from toilets, washrooms and canteens.

Our EPA licence requires us to manage our waste water on or off-site and ensure that it does not cause environmental pollution when discharged into the environment.

The information below summarises how we treat the waste water produced from our activities, where it is released and the results of monitoring this year.

1. Waste water produced by our activities is treated as follows before discharge to a receiving waterbody;

Sanitary waste water from the site is collected by the waste water network and discharged to the existing Local Authority sewer. Rainwater harvested and treated with sodium hypochlorite is used in the evaporative cooling system on site and discharged as process waste water to the same waste water network.

The CAB building and canteen/catering operations within the CAB building became operational in March 2025.

All waste water discharged from site enters the Local Authority (South Dublin County Council) foul sewer, discharging to Ringsend WWTP. Treatment here includes screening/grit removal, rectangular primary tanks with Lamella settlers, SBR and Nereda Pilot Plant, UV treatment (during the bathing season) and Anaerobic digestion followed by thermal drying.

2. Treated waste water from our facility is released into the following water bodies:

Liffey Estuary Lower (Transitional Waterbody) & Dublin Bay (Coastal Waterbody) (from emission point SE1)

Table 9 Summary of Waste Water Monitoring

Parameter measured	No. of Samples	% Compliant	Comment
BOD	12	42%	See comment below
Chloride	12	100%	
COD	10	30%	See comment below
Hardness Total	12	100%	
pH	12	92%	See comment below
Solids	12	67%	See comment below
Sulphate	12	100%	
Temperature	9	100%	

Add rows as necessary

Comment

The waste water network on site, including emission point SE1 the final discharge from site, which was not fully accessible in the first part of 2025. Monthly 24-hour composite foul water monitoring was carried out at two locations in 2025.

From January to May 2025 monitoring was carried out at a temporary location adjacent to the water treatment plant where the process water arising from the operation at the site is collected. All 24hr composite samples from January to May were compliant with the waste water ELVs.

From June 2025, monthly sampling was relocated to the SE-1 location specified in the site license, representing combined canteen, welfare, and process wastewater. From June onwards, ELV's for BOD, COD, pH, and Suspended Solids were exceeded due to the combined nature of the wastewater which have ELV's set based on a process water profile. Microsoft

has engaged with Uisce Éireann and the EPA to submit a technical amendment to relocate the sampling location to include process water only, which was approved in March 2026. Based on the data collected throughout 2025 and on the proposed relocation of the foul monitoring point it is reasonable to report that the process water does not exceed the ELV's outlined in schedule B.3 and the recorded exceedance of the ELV's are associated with the canteen and welfare waste to which the ELV's do not apply. The exceedances detected and reported in 2025 should not be exceedances and will be corrected in accordance with the approved technical amendment to P1187-01.

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Air

Explanation

Generally, three types of air emissions are monitored from industry in Ireland: gases, dust (particulates) and odour. Our EPA licence requires us to ensure that any air emissions from our activities do not cause air pollution or create an odour nuisance.

The information below details the number of air emission points we monitor, the results from testing the air emissions and any odour assessments carried out by us and the EPA this year.

1. We monitor air emissions from the following number of emission points at our facility.

Main Emissions – A2-1 to A2-22 (gas generation plant)

Minor Emissions – A3-1 to A3-21 (backup generators)

Ambient Monitoring – The ambient monitoring programme was approved by the EPA in mid-2025 and comprises two EPA approved reference Monitor at the southern and western boundaries of the site and one indicative monitor located to the northwest. Due to ongoing construction and access challenges at the site in 2025 the two reference monitors were installed and commissioned in July and August 2025. Two indicative monitors were in place prior to that on a temporary basis until the reference monitors could be commissioned. Following the commissioning of the reference monitors, one of the indicative monitors was relocated to the northeast of the site in August 2025.

2025 data was collected from two indicative monitors and two continuous reference monitors.

Due to delay in high pressure gas, 12 of the 7.6 MWth gas engines/generators are unavailable and not in use. Approval under Condition 1, temporary power

generation was granted in 2025 for the installation of 8 no., 8.8MWth temporary HVO generators, 4 no. of which were installed (A3-25, A3-26, A3-30 and A3-31). An update was provided to the EPA in December 2025 to confirm four of the approved temporary generators have been installed and an updated timeline for the transition period to high pressure gas was provided to allow the removal and replacement of the temporary generators.

Table 10 Summary of Air Emissions Monitoring

Parameter measured	No. of Samples	% Compliant	Comment
NO	Continuous	N/A	No ELV or trigger level applicable
NO _x	Continuous	N/A	No ELV or trigger level applicable
NO ₂	Continuous	100%	Information threshold: 150µg/m ³ Alert threshold: 200µg/m ³
NO ₂	11	100%	ELV
CO	11	N/A	No ELV or trigger level applicable
SO ₂	10	N/A	No ELV or trigger level applicable
CO ₂	11	N/A	No ELV or trigger level applicable

O	11	N/A	No ELV or trigger level applicable
Flow	11	90.91%	See comment below

Comment

The gas generation plant on site (emission points A2-1 to A2-22) was not fully operational in 2025 10 of the 22 gas engines became operational in January 2025. Stack monitoring was undertaken in April 2025 in line with licence conditions. No main air emission monitoring could be undertaken in 2025 on the remaining 12 engines. The ten commissioned and remaining 12 engines once fully operational will be monitored once every three years for CO, NO_x and flow. An ELV for NO_x is set out in the site's licence. The results of monitoring completed of the ten commissioned engines in April 2025 confirmed compliance with the ELV for NO_x.

The site's licence requires minor emission points to be monitored once every five years or when three times the permitted maximum annual operating hours have elapsed. As the licence was granted in 2023, and the site is not yet fully operational, neither of these scenarios apply and no minor emission point monitoring was undertaken in 2025.

Stack emissions monitoring was undertaken at Emission Point A2-13 by SOCOTEC UK Ltd on behalf of the EPA (site visit reference SV30912). Monitoring results demonstrated that concentrations of NO_x and CO were within the relevant concentration-based emission limit values. However, a non-compliance was identified in relation to volumetric flow rate. All required actions in response to the non-compliance were carried out by Microsoft within the required timeframe.

Continuous ambient air monitoring is in place on site with reporting intervals recording hourly average concentrations of NO, NO_x and NO₂. The indicative monitors are continuously monitoring CO, particulate matter and NO, NO_x

and NO₂. The continuous reference monitors are continuously monitoring NO, NO_x and NO₂. The information and alert thresholds detailed above are not ELVs, but are set out in EU legislation on ambient air quality (Annex I of Directive 2024/xx/EC). The site was 100% compliant with both of these thresholds. An ambient air quality monitoring report will be submitted to the EPA annually.

Table 11 Summary of Odour Assessments Carried Out

Assessment Conducted By	No. of Odour Assessments	% Compliant⁸	Comment
Licence Holder	-	-	-
EPA	-	-	-

Add rows where necessary

Comment

The activities on site do not generate odour sources. There is no requirement to carry out odour assessments.

⁸ A compliant odour assessment is based on EPA Odour Impact Assessment Guidance available at [Air Enforcement | Environmental Protection Agency \(epa.ie\)](#)

Fugitive Solvent Emissions

Are you required to monitor fugitive solvent air emissions from your facility?

Yes ☐

No ☒

Explanation

The use of solvents is regulated under Irish and European Union (EU) Regulations⁹. Solvents are chemicals that, by their nature, are volatile (evaporate readily under ambient conditions). Solvents can be found in many inks, glues and cleaning agents. Due to the volatility of solvents some emissions may be released into the atmosphere during our activities before being captured in our air treatment system. This type of emission is called a **fugitive solvent emission**.

The information below summarises the quantity of solvents used this year, the percentage of fugitive solvent emissions (% of total quantity used) and whether the percentage complied with the targets set in the EU Regulations.

Table 12 Summary of Fugitive Solvent Emissions

Quantity of Solvents Used (Kg)	% Fugitive Solvent Emissions	Compliant
-	-	-

Comment

The activities on site do not generate fugitive solvent emissions.

⁹ See Annex VII of the Industrial Emissions Directive

<https://ec.europa.eu/environment/industry/stationary/ied/legislation.htm>

Groundwater

Explanation

Groundwater is an important and sensitive resource in Ireland. Our EPA licence requires that we monitor groundwater to ensure our activities do not cause groundwater pollution.

Understanding how groundwater flows through soil and rock layers and eventually into surface and coastal waters is a complex science. Sometimes groundwater pollution that occurred in the past can take years and even decades to disappear. Therefore, it is important that experts help us monitor and interpret results from groundwater monitoring and testing.

The information below is a basic summary of the condition of the groundwater this year.

1. Do you have a groundwater monitoring programme in place?

Yes ☐

No ☒

2. Have the groundwater monitoring results over the last 5 years indicated the presence of groundwater pollution?

Yes ☐

No ☒

Table 13 List of Groundwater Pollutants Identified

Pollutants
Not Applicable

Add rows as necessary

3. Give details of the investigations and subsequent actions taken, where applicable, to manage the groundwater pollution.

Not Applicable

Comment

The site's licence requires groundwater to be monitored for relevant hazardous substances every five years. As the licence was granted in 2023, and the site is not yet fully operational, no monitoring has been undertaken to date. A project to install the groundwater monitoring wells in line with the EPA approved programme commenced in 2025 with preliminary and enabling works completed. Borehole drilling and monitoring well installation will be undertaken in February/March 2026 with groundwater monitoring to follow in Q2 of 2026.

Noise

Explanation

Our EPA licence requires that we monitor noise emissions from our facility. Noise monitoring can be conducted at the boundary of our facility and/or at locations beyond the boundary referred to as “noise sensitive locations”. Noise monitoring requires the use of special noise monitoring equipment. Our EPA licence requires that noise produced by our facility shall not exceed the noise limit values and/or give rise to nuisance.

The information below gives a summary of when and where we conducted noise monitoring this year and if results complied with our EPA licence limits.

1. We conducted noise monitoring on the following dates this year:

Day: 09:6hrs to 17:58hrs on 13th August 2025

Evening: 21:21 hrs to 22:48 hrs on 13th August 2025

Night: 23:00 hrs on 13th August to 00:32 hrs 14th August

2. Where was the noise monitoring carried out?

- i. the boundary of our facility;
- ii. noise sensitive locations off-site; or
- iii. both.

Both

3. Were measured noise levels compliant with your EPA licence limits?

Yes ☒

No ☐

If No, we took the following actions to address the noise level exceedances?

Not Applicable

Comment

The results of the survey confirm that in all cases specific noise levels (ie noise attributable to activities within the IEL boundary) fall within the specified emission limit values for noise as set out in the license. No audible tonal or impulsive noise was observed at any period.

7) Waste

Waste Generated

Explanation

Our EPA licence requires us to manage the waste we generate in a manner that does not cause environmental pollution.

We manage, store and record hazardous, non-hazardous and inert waste we generate in accordance with our licence. We ensure that this waste is subsequently treated or disposed of in accordance with the relevant waste Regulations.

The information in Table 14 is a summary of waste we generated this year and the percentage increase or decrease on the previous year. The percentage recovery is the amount of total waste generated that was reused, recycled or recovered.

Table 14 Waste Generated

Type	Quantity (Tonnes)	% Increase/ decrease on previous year	% Recovery
Hazardous	4.981	- 3.86%	-0.04%
Non-Hazardous	37.11	+137.88%	100%
Inert	-	N/A	N/A
Total Tonnes	42.091	+102.56%	88.17%

Comment

The majority of waste generated onsite is non-hazardous. Hazardous waste generated onsite in 2025 is associated with maintenance of the petrol interceptors. The increase in non-hazardous waste generation is associated with the continued construction, commissioning, and operation of the CAB building and gas plant which were not completed in 2024. These

developments resulted in higher waste generation and are consistent with the planned growth of campus operations and service delivery requirements.

Waste Accepted

Did you accept waste onto your facility for storage, treatment, recovery or disposal this year?

Yes ☐

No ☒

Explanation

Our EPA licence requires us to manage the waste we accept in a manner that does not cause environmental pollution.

We manage, store and record all incoming and outgoing hazardous, non-hazardous and inert waste. The waste we accept may be treated, recovered, disposed or stored at our facility depending on our licence requirements.

The information in Table 15 provides a summary of waste we accepted this year and the percentage increase or decrease on the previous year. The percentage recovery is the amount of total waste accepted that was reused, recycled or recovered.

Table 15 Waste Accepted

Type	Quantity (Tonnes)	% Increase/ decrease on previous year	% Recovery
Hazardous	-	-	-
Non-Hazardous	-	-	-
Inert	-	-	-
Total Tonnes	-	-	-
	-	-	-

Comment

Not Applicable

8) Financial Provision

Explanation

Our EPA licence requires us to assess the risk our activities pose to the environment if we cease our activities or if an incident occurred. If we are identified as a high risk facility¹⁰ by the EPA, we are required to put provision in place such as a financial bond or insurance to cover the cost of restoring our site to a satisfactory condition. This financial provision can then be used to cover the cost of managing the restoration or clean up should such an event occur.

1. Are you required to have an agreed financial provision in place?

Yes ☐

No ☒

2. What year was your Closure, Restoration and Aftercare Management Plan (CRAMP) last agreed by the Agency?

N/A

3. What year was your Environmental Liability Assessment Report (ELRA) agreed by the Agency?

N/A

4. Has there been any significant changes on your site since the last agreements?

Yes ☐

No ☒

If yes, have you submitted details to the EPA?

Yes ☐

No ☐

N/A ☒

¹⁰ See Appendix II

Appendix I

Class of Activity

Industrial and waste facilities are classed into different sectors depending on the nature of their activity and its potential impact on the environment. The EPA Act 1992 as amended, outlines these as follows:

Class 1	Minerals and other materials
Class 2	Energy
Class 3	Metals
Class 4	Mineral fibres and glass
Class 5	Chemicals
Class 6	Intensive Agriculture ¹¹
Class 7	Food and drink
Class 8	Wood, paper, textiles and leather
Class 9	Fossil fuels
Class 10	Cement, lime and magnesium oxide
Class 11	Waste
Class 12	Surface Coatings
Class 13	Other Activities

¹¹ This reporting template is not applicable to the **intensive agriculture sector**. Their annual environmental reporting structure is different and can be found at [Compliance & Enforcement: Licensees: Reporting Publications | Environmental Protection Agency \(epa.ie\)](#)

Appendix II

High Environmental Risk Categories

If an industrial or waste licence falls into one of these categories it is deemed, by the EPA, as a high environmental risk. As a result, the licence holder is required to have financial provision in place. See section 8, Financial Provision.

1. Landfills
2. Non-Hazardous Waste Transfer Station
3. Incineration and Co-Incineration Waste Facilities
4. Category A – Extractive Waste Facilities
5. Upper and Lower Tier Seveso Facilities
6. Hazardous Waste Transfer Stations
7. High Risk Contaminated Land
8. Exceptional Circumstances

NOTE:

This list is subject to change.

See the link below for further information.

[Compliance & Enforcement: Financial Provisions Publications | Environmental Protection Agency \(epa.ie\)](#)

Appendix III

Beyond Compliance

The case study below shows how we went beyond the requirements of our licence in the reporting year.

Green Energy Procurement & Leadership

The Dublin campus contributes directly to Microsoft's corporate commitment to 100% renewable electricity globally, supported through long term renewable PPAs and market instruments. Although not a licence requirement, this proactive sourcing significantly supports national decarbonisation pathways. This leadership was further reinforced in February 2026 when Microsoft officially announced that it had met its 2025 goal of matching 100% of its global electricity consumption with renewable energy, marking a major milestone in the company's journey toward becoming carbon negative. This achievement—highlighted as a standout accomplishment despite global pressures and competitors scaling back sustainability commitments—underscores the importance of Dublin's ongoing energy efficiency work, local optimisation projects, and environmental management initiatives in supporting Microsoft's broader renewable energy transition.

Sustainable Waste and Environmental Practices

Beyond regulatory requirements, Microsoft Ireland continues to advance initiatives focused on waste reduction, circularity, and biodiversity across the Dublin data centre campus.

Waste management practices prioritise minimisation, segregation at source, and diversion from landfill. As part of ongoing improvement, an enhanced food waste management approach has been implemented whereby food waste is processed by BIA Energy, Ireland's largest food waste facility. Food waste is converted into 100% renewable biomethane via anaerobic digestion, with gas injected into the Gas Networks Ireland grid, while residual material is transformed into high grade bio fertiliser for agricultural use, supporting a closed loop circular economy.

Biodiversity considerations are incorporated where practicable through the protection of existing green spaces and the identification of opportunities for enhancement as part of continual improvement planning. These initiatives demonstrate Microsoft Ireland's commitment to environmental stewardship beyond statutory compliance.