Charting the Course:

Insights into Ireland's Sustainable Finance, ESG Reporting and Disclosure Landscape

Commissioned by:

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1. Glossary

Abbreviation & Definition			
CSRD	Corporate Sustainability Reporting Directive	**ISSB**	International Sustainability Standards Board
CDP	Carbon Disclosure Project	**MIFID**	Markets in Financial Instruments Directive
CRA	Credit Rating Agency	**NFRD**	Non-Financial Reporting Directive
CSDDD	Corporate Sustainability Due Diligence Directive	**NGO**	Non-Governmental Organisation
EBA	European Banking Authority	**PRI**	Principles for Responsible Investment
EFRAG	European Financial Reporting Advisory	**SASB**	Sustainability Accounting Standards Board
ESG	Environmental, Social, Governance	**SEC**	U.S. Securities and Exchange Commission
ESRS	European Sustainability Reporting Standards	**SFDR**	Sustainable Finance Disclosure Regulation
EU	European Union	**TCFD**	Task Force on Climate-related Financial Disclosures
FMP	Financial Market Participants	**TNFD**	Task Force on Nature-related Financial Disclosures
GRI	Global Reporting Initiative	**UN SDGs**	United Nations Sustainable Development Goals
IFRS	International Financial Reporting Standards	**WEF**	World Economic Forum

2. Key Findings

Key Findings:	
Data Availability & Quality	• The Irish financial sector grapples with issues of data granularity, needing more refined data for both domestic and international reporting. • Compliance with timely disclosures remains a persistent challenge, highlighting a requirement for enhanced data management systems.
Methodological Issues	• Standardisation challenges arise due to the dichotomy between international and EU directives on sustainability reporting. • Interoperability approach included in the development of the core EU, USA and international approaches including the EU CSRD and international IFRS S1&S2 is aimed at consistent standardisation of reporting and disclosure across climate and wider sustainability thematics. • A tailored approach is imperative for responsible investment strategies in the Irish context, considering the EU's carbon-neutral goals.
Integration with Financial Reporting	• Institutions face the challenge of harmonising ESG disclosures with existing financial reporting frameworks. • The Irish Climate Action Plan underlines the importance of integrating climate change metrics within risk management structures.
Regulatory & Compliance Issues	• A dynamic regulatory environment, both in Ireland and the EU, necessitates continuous adaptability and knowledge upgrading. • Cross-jurisdictional compliance adds layers of complexity due to the divergence in financial regulations across regions.
Resource & Technical Constraints	• Resource allocation becomes complex with dual pressures of regulatory obligations and investor expectations. • Building technical expertise in the evolving realm of sustainable finance across ESG is paramount.
Verification & Assurance	• Adhering to local and EU assurance requirements is intricate, calling for a deepened expertise and rigorous oversight. • Third-party verification emerges as pivotal for enhancing trustworthiness and accountability in the sector.
Stakeholder Engagement	• Engaging key stakeholders, ranging from investors, lenders, customers, employees to the public, is crucial for institutions to communicate commitment to sustainability. • Consistent, high quality data disclosure aims to inform better decision making amongst stakeholders – especially shareholders to inform growing investments that are truly sustainable. This is the ambition of the EU Sustainable Finance Action Plans alignment between the SFDR (shareholder disclosures) and the CSRD (corporate disclosures) • Owning a credible ESG narrative and communicating this is key for all businesses to show progress in sustainable market transformation. Using standardised, science based ESG datapoints as defined in regulatory reporting requirements like CSRD, SFDR and IFRS S1&S2 enables this and prevents greenwash.

3. Methodology

3.1 Purpose and Scope

This study aims to enhance the understanding and preparedness of financial institutions in Ireland for evolving ESG reporting and disclosure requirements. It evaluates current practices, identifies gaps, and offers guidance to ensure accuracy, completeness, and efficiency in ESG reporting.

3.2 Methodology

A comprehensive literature review was conducted to discern the reporting and disclosure gaps in the Irish financial services sector. This involved an in-depth analysis of academic papers, industry reports, and publications from the European Union and the Central Bank of Ireland. Alongside this, we conducted ten unstructured interviews with a diverse range of stakeholders, including financial analysts, sustainability professionals, and representatives from significant financial organisations in Ireland, international organisations and NGO's. The objective was to gain real-time insights into the intricacies of the sector's reporting and disclosure practices.

To bolster the trustworthiness and depth of our findings, our research underwent a review procedure, receiving insights and feedback from relevant figures in the domain of financial transparency and disclosure. However, it's essential to note the inherent limitations of our study: the contemporary nature and breadth of the data posed certain challenges, and the subjective elements present in qualitative interviews demand a measured interpretation.

In essence, our research methodology integrated qualitative interviews with secondary data analysis, offering a holistic view of the reporting and disclosure gaps in the Irish financial sector.

4. Report Findings

4.1 The Current Landscape of Sustainable Finance, ESG Reporting and Disclosure

In a world increasingly driven by environmental, social, and governance (ESG) imperatives, the financial sector finds itself at a transformative crossroads. As key enablers of economic growth, financial institutions have a pronounced influence on guiding investments and corporate behaviours toward sustainable practices. This influence is moulded, in large part, by a web of reporting standards and regulatory frameworks that dictate how financial institutions should incorporate and communicate their sustainability efforts. As we embark on an exploration of the sustainability reporting landscape, it is essential to view it through a three-pronged lens: the European Union (EU) scene, the global scene, and the specificities of the Irish context.

4.2 European Union (EU) Landscape

The European Union's landscape for Financial Market Participants (FMP) is undergoing significant transformation in the context of environmental, social, and governance (ESG) regulations. The emergence of climate change and biodiversity risks has necessitated the adoption of regulations that emphasise sustainable business practices and transparent reporting on the same.

The ***EU Sustainable Finance Action Plan*** launched in 2018, provides a framework of 10 action items to redirect capital flows towards the green economy.

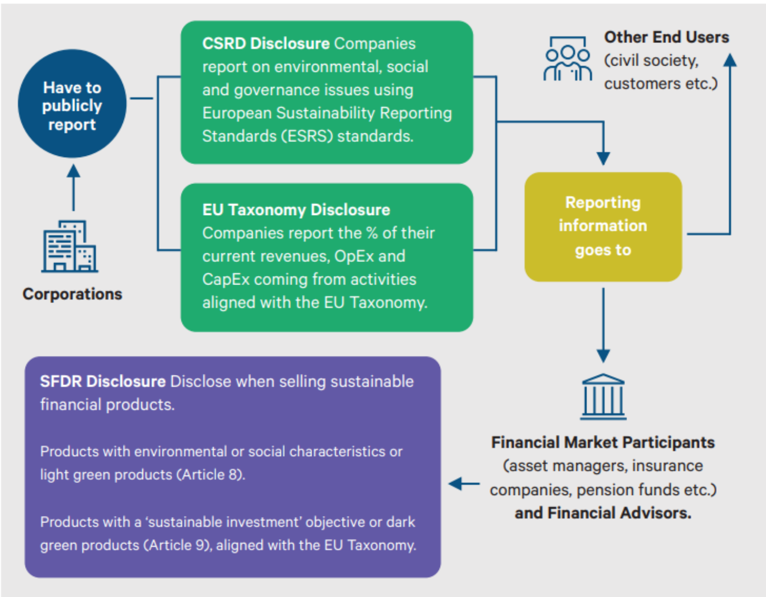
The Plan aims to:

- Redirect capital flows towards a more sustainable economy.
- Integrate sustainability into risk management, and

- Promote transparency and long-term thinking in financial markets.

Action Item	Action	Main Related Regulation
1	Establishing an EU classification system for sustainable activities	EU Taxonomy
2	Creating standards and labels for green financial products	SFDR
3	Fostering investment in sustainable projects	SFDR/Taxonomy/CSRD/GBS
4	Incorporating sustainability when providing financial advice	MIFID II
5	Developing sustainability benchmarks	EU Benchmark Regulation
6	Better integrating sustainability in ratings and market research	CRA guidelines & upcoming regulations
7	Clarifying institutional investors' and asset managers' duties	SFDR
8	Incorporating sustainability in prudential requirements	EBA Pillar I framework amendments
9	Strengthening sustainability disclosure and accounting rulemaking	CSRD
10	Fostering sustainable corporate governance and attenuating short-termism in capital markets	CSDDD

CSRD, SFDR and the EU Taxonomy are key parts of the EU Sustainable Finance Action Plan framework creating the market "push and pull" factors to drive corporations and investors to transition to the green economy (illustrated below).



Source: EU Sustainable Finance Action Plan

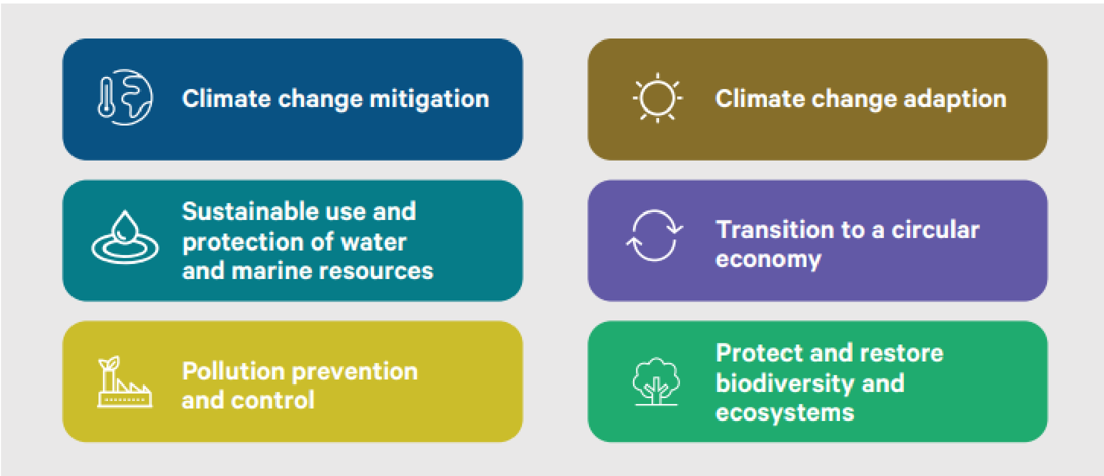
The ***Sustainable Finance Disclosure Regulation*** (**SFDR**), launched in March 2021, mandates in-scope financial market participants to disclose information related to sustainable investments and the risks associated with sustainability. The primary objective of SFDR is to enhance transparency in sustainability and ensure that companies can finance sustainable growth. The regulation includes disclosure requirements that apply to both businesses and financial products to standardise sustainability reporting and prevent "greenwashing".

SFDR categorises investment funds into three categories of sustainability based on the product's sustainability objectives[1]. According to the SFDR's classification system, a fund will either be classified as an Article 6, 8 or 9 fund – depending on its characteristics and level of sustainability:

- Article 6: Funds without a sustainability scope
- Article 8: Funds that promote environmental or social characteristics (light green)
- Article 9: Funds that have sustainable investment as their objective (dark green)

Principal Adverse Impacts (PAI) are a cornerstone of SFDR and relate to the potential negative impacts that a financial product may have on 64 adverse sustainability indicators. SFDR requires financial market participants to disclose this PAI information semi-annually.

The ***EU Taxonomy*** is a science-based classification system which provides a standard for determining whether an economic activity can be considered environmentally sustainable. The Taxonomy assess companies and funds against several criteria focused on six key environmental objectives outlined below.



Source: EU Commission

One of the key issues facing financial market participants is the requirement under SFDR to report non-financial data on investee companies which themselves are not yet required to report non-financial data under CSRD. The regulatory reporting timing mismatch is causing considerable issues for financial market participants and requires data consolidation and estimation. This is evidenced by the high number of EU funds reporting 0% alignment with EU Taxonomy. It must be noted however that the ESAs & EC are keen that asset managers should be conservative in their reporting of alignment.

In January 2023, the European Union introduced the **Corporate Sustainability Reporting Directive (CSRD)**, supplanting the former EU Non-Financial Reporting Directive (NFRD). This transformative directive was designed to enhance the transparency and depth of Environmental, Social, and Governance (ESG) reporting. It's particularly pertinent for Irish financial services to note that the CSRD targets EU entities that fit within distinct parameters: those boasting over 250 employees, holding a balance sheet exceeding €20 million, or realising a revenue above €40 million. The initiation of the CSRD's reporting mandates is set to commence in 2025, adopting a phased approach contingent on a company's size and prior adherence to the NFRD. Large entities previously aligned with the NFRD, alongside sizeable non-EU listed firms harbouring over 500 employees, are set to spearhead this reporting transition in 2025, specifically addressing the fiscal milestones of 2024.

The CSRD, although rigorous in its demands, underscores the essential need for Irish financial entities to proactively prepare for these impending ESG regulatory reporting obligations. This directive's complexity, although potentially daunting, intends to amalgamate and streamline several divergent standards, such as SASB, GRI, ISSB, and TCFD, under the IFRS canopy. This will invariably facilitate a more cohesive, consistent, and qualitative data delivery to stakeholders, ensuring clarity and comparability. The reporting directives pivot around the European Sustainability Reporting Standards (ESRS), conceptualised by EFRAG. These standards put a premium on sustainability due diligence, championing a "double materiality" approach that rigorously evaluates both a company's socio-environmental impacts and their financial performance. Moreover, the push for digital data submission will bolster stakeholder access and align with the broader European SFDR datapoints. With mandatory assurance metrics starting at a 'limited' scope and transitioning to a comprehensive 'reasonable' assurance, Irish financial services must be primed to meet these evolving standards. The overarching message is clear: the ESRS and EFRAG's guidelines on double materiality are poised to be the cornerstone of CSRD-compliant reporting for the financial sector.

While the European Union's landscape is intricately evolving to meet the heightened demands of sustainability and regulatory oversight, it's important to recognise that these changes extend beyond the confines of the EU. The global financial ecosystem, which is deeply interconnected, is simultaneously undergoing significant transformations. The standards, regulations, and initiatives on the global stage both shape and complement the EU's pioneering efforts and must be considered by the Irish Financial Services sector when analysing reporting and disclosure requirements.

4.3 Global Landscape

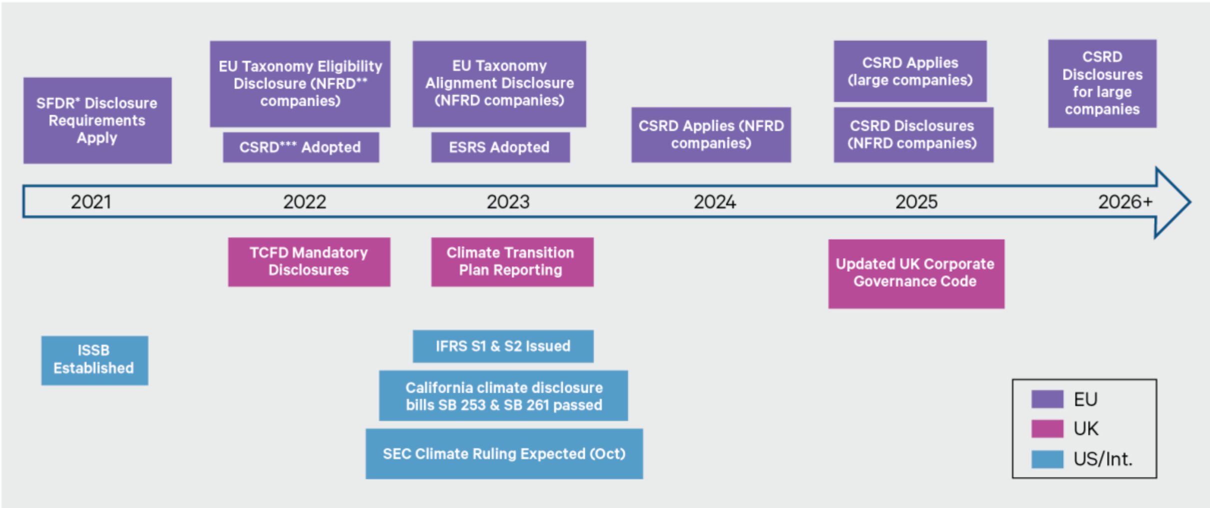
The Irish financial services sector Non-Financial ESG reporting is influenced by regulation and a range of global standards and frameworks. The Global Reporting Initiative (GRI), an early forerunner in this domain, provides expansive standards tailored for diverse organisations, promoting transparency and accountability[2]. Similarly, the Sustainability Accounting Standards Board (SASB) – now part of the Value Reporting Foundation - offers sector-specific guidance, enabling firms to highlight material sustainability issues affecting financial performance[3]. The adoption of International Financial Reporting Standards (IFRS Standards), while primarily focused on financial reporting, has implications for how entities account for and disclose sustainability-related risks[4].

In the US, recent endeavours by the U.S. Securities and Exchange Commission (SEC) emphasise the rising importance of ESG disclosures, as they started to intensify their focus on how companies address climate risks and human capital in their reporting[5]. Furthermore, the California Act (Oct 2023) has been instrumental in bolstering environmental and sustainability standards, mandating businesses to meet specified criteria.

Both the Financial Stability Board and its offshoots, the Task Force on Climate-related Financial Disclosures (TCFD) and the established Task Force on Nature-related Financial Disclosures (TNFD), push for a deeper understanding and reporting of environmental financial risks[6]. Concurrently, investor-driven disclosures like the originally named Carbon Disclosure Project (CDP) intensify the emphasis on clear, comparable, and consistent environmental disclosures covering climate change, forests, biodiversity, and supply chain[7].

Taking a more overarching stance, the Principles for Responsible Investment (PRI) offers a global standard for integrating ESG factors into investment decisions[8], while the Supervisory Statement delineates expectations concerning banks' approaches to managing financial risks from climate change[9^]. The incorporation of sustainability considerations by Domestic stock exchanges can further amplify the demand for consistent reporting practices. Beyond the specific financial domain, the United Nations Sustainable Development Goals (UN SDGs) serve as a compass, outlining broader societal and environmental targets, resonating deeply with the financial sector's growing commitment to responsible growth[10]. Lastly, initiatives from bodies like the World Economic Forum (WEF) spotlight the intersection of finance, governance, and sustainability, underscoring the sector's role in global sustainability endeavours[11].

Regulatory Landscape – DISCLOSURE & REPORTING (USA, EU & UK)



*Sustainable Finance Disclosure Regulation (SFDR)
**Non-Financial Reporting Directive (NFRD) in EU from 2018
***Corporate Sustainability Reporting Directive (CSRD)

Source: Davy Horizons, October 2023

5. Challenges in Sustainable Finance Reporting in Ireland

Working with these key frameworks exposes the transition towards sustainable finance in Ireland as a complex process, characterised by a series of challenges that financial institutions must navigate. During our interviews, many of these challenges were consistently echoed, underscoring their significance within the sector. In this section, the following table delineates these challenges in a structured manner and propose actionable recommendations to address them, aiming to foster a more robust and transparent sustainable finance reporting framework in Ireland.

	Area of Concern	Challenge	Irish Financial Sector	Recommendations	Ireland's Sustainable Finance Roadmap Pillars[12]
1	Data Availability and Quality	Granularity of Data	Current Situation: Within the Irish Financial Services Sector, there's a burgeoning demand for refined data granularity to fulfil both EU and international sustainable finance reporting mandates. As sustainability considerations gain traction, the call for more detailed and nuanced data points has intensified. Institutions are racing to refine and possibly overhaul their data management systems to meet these exacting requirements[13]. Implications: Without detailed data, institutions risk making uninformed investment decisions. Insufficient granularity may also result in potential non-compliance with stringent regulations, leading to financial penalties and reputational damage. Furthermore, the inability to provide granular data may erode stakeholder trust, crucial for attracting and retaining investments[14].	Adopt Advanced Data Management Tools: To enhance granularity, institutions can explore sophisticated digital tools tailored to their specific needs. These platforms offer comprehensive solutions to refine data collection, ensuring granularity that aligns with international standards[15]. Routine Audits: By instituting regular audits, institutions can continually monitor their data collection practices. These audits can serve as checkpoints, identifying discrepancies and ensuring that the data being collected remains relevant and precise. Regular internal checks, be it bi-annual or quarterly, can provide invaluable insights and drive data quality enhancement[16]	Pillar 3: Leveraging Digital

		Timeliness	Current Situation: Sustainable finance is a rapidly evolving field, and with this swift evolution comes the need for timely data collection and reporting. Many Irish financial institutions find themselves caught in a race against time as they try to navigate, collate, and report data in line with fast-changing regulatory frameworks[17]. Implications: Delays in data collection and reporting can have serious consequences. Institutions might face regulatory sanctions, which can be costly. Moreover, untimely data reporting can erode stakeholder confidence, making it harder for institutions to attract investments or gain support for their sustainable initiatives[18].	Implement Robust Data Collection Systems: Investing in state-of-the-art data collection systems is not just a luxury but a necessity. These systems can provide real-time data extraction capabilities, ensuring that institutions always have the most up-to-date data at their fingertips. Use Digital Tools for Efficient Reporting: Automation can be a game-changer in the reporting cycle. Automated tools and platforms can process vast amounts of data swiftly, ensuring timely and accurate reporting. Embracing such tools can help institutions remain ahead of the curve, consistently meeting, if not exceeding, regulatory timelines.	Pillar 3: Leveraging Digital
2	Regulatory and Compliance Issues	Regulatory Evolution	Current Situation: Driven by the evolving mandates from the European Union and other international regulatory bodies, Ireland must adapt to many sustainable finance directives. The pace and scale of these regulations mean institutions, must maintain agile operational frameworks to integrate new mandates swiftly. Implications: A delay or inability to integrate these regulatory changes can pose multi-faceted risks. Directly, there's the threat of financial penalties arising from non-compliance. On a broader scale,	Proactive Regulatory Training: Institutions should invest in regular training sessions to keep their teams abreast of emerging regulatory trends[19]. Collaborative Forums: Establishing or participating in industry forums and working groups can facilitate knowledge exchange, allowing institutions to share insights, challenges, and best practices in adapting to regulatory changes[20]	Pillar 1: Developing Talent Pillar 2: Training and Industry Readiness

			reputational risk could lead to diminished stakeholder confidence and trust, potentially jeopardising future investment opportunities and partnerships.		
		Cross-Jurisdictional Compliance	Current Situation: Cross-jurisdictional compliance presents multifaceted challenges for the Irish financial services sector, as many firms operate beyond the EU, necessitating adherence to a plethora of global regulations. Implications: The divergence in financial regulations, data protection rules, and anti-money laundering directives across regions adds layers of complexity for Irish entities with international footprints[21]. Navigating this intricate web of regulations requires Irish financial firms to invest in specialised compliance expertise and tools, ensuring they remain aligned with varying global standards while safeguarding their operations[22].	Global Compliance Teams: Instituting specialised teams or units focused on understanding and integrating international regulations can aid in seamless global operations. Tech-Driven Compliance Platforms: Leveraging digital platforms can help institutions monitor real-time regulatory changes across different jurisdictions, ensuring timely compliance and reducing manual oversight.	Pillar 3: Leveraging Digital Pillar 4: Enabling Environment
3	Methodological Issues	Standardisation	Adhering to International and EU directives standards on sustainability reporting. Standardisation in sustainability reporting presents intricate challenges for the financial sector, especially in light of varying International and EU directives. Institutions are often faced with the task of reconciling differences between global benchmarks, striving to create reports that	Inter-Institutional Collaborative Frameworks: Foster platforms for Irish financial bodies to collaborate, ensuring that while adhering to global standards, the unique intricacies of Irish financial paradigms are not lost. Benchmarking and Feedback Loops: Regularly contrast reports against global sustainability standards. Encourage feedback, fostering a	Pillar 2: Industry Readiness

			resonate across multiple regulatory fronts.	continuous improvement cycle. Expert-Led Workshops: Establish ongoing training sessions where international and local reporting experts share insights, trends, and best practices.	
		Scope Definition	Current situation: Addressing specific sustainability concerns such as responsible investment in Irish context. As the EU ambitiously targets a carbon neutral future by 2050, there’s an emphasis on shifting from fossil fuels to renewable sources. Implications: Irish financial institutions are presented with the multifaceted task of not just divesting from traditional energy sectors but also identifying and investing in emerging renewable technologies that vary across member states due to differing geographical, technological and infrastructural realities. A one size fits all approach is insufficient, and responsible investment strategies must be tailored to Irish resources, capabilities and energy needs[23].	Holistic Energy Portfolio Analyses: Partner with academic and industry experts to get a granular understanding of Ireland's renewable energy landscape, factoring in local strengths and limitations. Multi-Stakeholder Deliberations: Convene roundtables with policymakers, energy experts, and investors, jointly carving out a strategic vision for sustainable investments[24]. Customised Investment Directives: Design investment matrices that consider Ireland's socio-economic fabric, emphasising projects that resonate with local needs while aligning with sustainability goals.	Pillar 4: Enabling Environment
4	Integration with Financial Reporting	Alignment with Financial Reporting Cycles	Current Situation: In Ireland, as institutions navigate incorporation of ESG in their financial reports, they must ensure that these sustainable disclosures align seamlessly with existing financial reporting cycles[25]. Implications:	Integration with Financial Reporting: Alignment with Financial Reporting Cycle. Customised Reporting Timelines: Tailor reporting timelines to align with Ireland's financial reporting cycles. Collaborate with regulators and	Pillar 3: Leveraging Digital

			industry peers to establish clear deadlines for integrating ESG disclosures, ensuring a smooth transition. Digital Data Integration: Invest in cloud-based digital platforms specifically designed to facilitate seamless integration of ESG data into financial reports. These platforms should offer real-time data synchronisation capabilities to meet reporting cycle requirements. Dedicated Reporting Teams: Form dedicated cross-functional teams comprising data analysts, sustainability experts, and financial reporting specialists. These teams should work collaboratively to ensure timely and accurate alignment of ESG disclosures with financial reporting. Regulatory Technology (RegTech) Adoption: Embrace RegTech solutions tailored to Irish financial institutions. These tools can automate the monitoring of regulatory changes related to sustainability reporting, enabling proactive adjustments to reporting cycles as per the roadmap's recommendations.	
	Reconciliation with Financial Metrics	Current Situation: There is a pronounced emphasis on ensuring that financial institutions not only account for, but also actively mitigate	Environmental Stress Testing: Conduct rigorous. environmental stress tests to assess the resilience of financial	Pillar 3: Leveraging Digital

	environmental risks within their operational and strategic paradigms. Implications: Institutions will need to create a holistic framework that serves both financial stability and environmental sustainability objectives.[26]	portfolios to climate-related risks, aligning with the roadmap's emphasis on an enabling environment for sustainable finance. Environmental Key Risk Indicators (KRIs): Develop and implement environmental KRIs that directly tie environmental factors to financial performance indicators. This ensures that the reconciliation process aligns with Ireland's specific sustainability goals. Green Bond Issuance: Explore opportunities for issuing green bonds to fund sustainable projects in line with Ireland's environmental objectives. These bonds can serve as financial instruments directly linked to environmental metrics. Sustainability-Linked Loans: Collaborate with financial partners to establish sustainability-linked loan agreements that incorporate specific sustainability metrics into financial covenants, incentivising alignment with environmental goals. Local Impact Metrics: Develop metrics that assess the impact of financial activities on local Irish communities and ecosystems, aligning with the roadmap's focus on considering Ireland's socio-economic fabric.	Pillar 4: Enabling Environment

				Continuous Review and Benchmarking: Regularly review and benchmark financial and sustainability metrics against industry best practices and global standards, incorporating insights from local sustainability experts and regulators.	
5	Resource and Technical Constraints	Resource Allocation	Current Situation: For the Irish financial services sector, resource allocation has grown increasingly intricate as firms grapple with the dual imperatives of fulfilling evolving regulatory obligations and addressing investor expectations[27]. Implications: Balancing these demands often means redirecting significant manpower and technological resources towards compliance units, potentially straining other operational facets[28]. Furthermore, as digital transformations continue to shape the industry's landscape, Irish financial entities are faced with the technical challenge of ensuring that their IT infrastructures are both robust enough to support regulatory changes and agile enough to adapt to shifting investor priorities[29].	Resource Efficiency Analysis: Conduct a comprehensive assessment of resource allocation to identify areas where adjustments can be made to balance regulatory obligations and investor expectations. Ensure that sustainability initiatives are adequately funded while optimising resource allocation for compliance units[30]. Invest in Technology (Pillar 4): Allocate resources to upgrade IT infrastructure, making it both robust and agile. Invest in digital solutions that support regulatory compliance and streamline reporting processes. Stakeholder Engagement: Engage with investors and regulatory bodies to gain a deeper understanding of their expectations and concerns regarding resource allocation. Collaborative discussions can help strike a balance between compliance and sustainability.	Pillar 1: Developing Talent Pillar 2: Capacity Building Pillar 4: Enabling Environment

	Technical Expertise	Current Situation: Amidst the global shift towards sustainable finance, the Irish financial services sector faces the challenge of cultivating technical expertise in this emergent domain[31]. Implications: While Ireland boasts a strong financial tradition, the nuances of sustainable finance—encompassing environmental, social, and governance (ESG) criteria—demand new skills, knowledge frameworks, and bespoke training programmes[32]. Recognising this, institutions are increasingly seeking collaborations with global sustainability experts and investing in capacity-building initiatives to ensure their teams are equipped to navigate the complexities of green finance[33].	Sustainability Training Programmes: Develop specialised sustainability training programmes for employees to build technical expertise in sustainable finance. Collaborate with global sustainability experts to provide tailored knowledge frameworks and training initiatives. Collaboration with Sustainability Experts: Establish partnerships or collaborations with global sustainability experts and organisations. These collaborations can provide access to expertise and resources necessary to navigate the complexities of sustainable finance. Capacity-building Initiatives: Invest in capacity-building initiatives that focus on developing technical skills related to environmental, social, and governance (ESG) criteria. This includes bespoke training programmes and knowledge-sharing platforms. Such initiatives contribute to enhancing capacity and expertise in sustainable finance. Continuous Learning Culture: Foster a culture of continuous learning and innovation within the organisation. Encourage employees to stay updated with emerging trends and best practices in sustainable finance.	Pillar 2: Industry Readiness

6	Verification and Assurance	Verification Complexity	Current Situation: In the sphere of verification and assurance, the Irish financial services sector confronts the intricacies of adhering to verification standards set forth by both local and EU auditing frameworks. Implications: The multifaceted nature of these standards, which span from financial assertions to sustainability disclosures, necessitates a depth of expertise and meticulous oversight to ensure rigorous and accurate verification[34]. As the landscape evolves, with ever-increasing emphasis on transparency and sustainability, Irish institutions must bolster their verification processes, ensuring they are robust and adaptable to both domestic and EU-wide assurance expectations[35].	Enhanced Training and Skill Development: Continuous training and partnerships with educational institutions are essential to equip verification professionals with the latest knowledge in domestic and EU auditing standards. Adoption of Advanced Verification Technologies: Leveraging technologies like blockchain and Artificial Intelligence can streamline verification processes and enhance the accuracy and efficiency of audits[36]. Transparency and Disclosure: Adopting a comprehensive disclosure framework and implementing regular disclosure of verification processes can bolster stakeholder trust and meet the increasing demand for transparency in the financial sector[37]. Stakeholder Engagement[38]: Engaging with stakeholders including investors, customers, and civil society will promote a culture of accountability and ensure a holistic approach to compliance.	Pillar 2: Industry Readiness Pillar 3: Leveraging Digital Pillar 1: Developing Talent
		Third Party Verification	Current Situation: Engaging credible third-party verification has become pivotal for the Irish financial services sector, especially as stakeholders increasingly seek tangible proof of transparency and	Engage Accredited Third-Party Verifiers: Seek engagement with third-party verification entities that hold reputable accreditations to ensure rigorous and impartial evaluation of	Pillar 2: Industry Readiness

			accountability. Leveraging independent external assessors not only bolsters the authenticity of reported figures and claims but also enhances the trust quotient among investors, regulatory bodies, and the wider public[39]. Implications: As sustainability and ESG metrics gain prominence, ensuring rigorous and impartial third-party verification will be instrumental in fortifying the sector's credibility and adherence to best practices[40].	financial and ESG disclosures[41]. Transparency in Verification Processes: Encourage transparency by disclosing the criteria and processes employed by third-party verifiers, which will foster greater trust and understanding among stakeholders[42]. Regular Updates and Reviews: Undertake regular reviews and updates of third-party verification processes to ensure they remain robust and aligned with evolving regulatory and industry standards[43]. Educational Initiatives: Launch educational initiatives to enlighten stakeholders on the importance and process of third-party verification, enhancing overall sector credibility and understanding.	
7	Stakeholder Engagement	Stakeholder Engagement	Current Situation: The Irish financial services sector is witnessing a mounting interest in sustainable finance from a wide range of stakeholders. This spectrum includes investors, regulatory bodies, the general public, and NGOs, all of whom are articulating a pronounced call for financial institutions to show a genuine commitment to sustainability goals and transparent communication of their progress. Implications: As the sector navigates this	Structured Engagement Framework: Establish a structured framework for regular engagement with stakeholders to understand their expectations, address concerns, and communicate progress regarding sustainability goals[44]. Transparent Communication: Adopt a clear communication strategy to regularly update stakeholders on sustainability initiatives, progress, and challenges,	Pillar 1: Developing Talent Pillar 5: Promotion and Communication

	transition, fostering open dialogues, understanding stakeholder expectations, and proactively addressing concerns are pivotal. These steps are essential for consolidating trust and aligning with the evolving sustainable finance landscape in Ireland.	ensuring compliance with local and EU disclosure mandates[45]. Educational Initiatives: Launch educational initiatives to inform stakeholders about the importance of sustainability in the financial sector and the measures being taken to achieve sustainability goals. Feedback Mechanism: Create a feedback mechanism to garner stakeholder insights on the institution's sustainability initiatives and to foster a culture of continuous improvement[46]. Collaborative Platforms: Establish collaborative platforms to engage with stakeholders in a meaningful way, allowing for open dialogues and shared decision-making in sustainability initiatives[47].

6. Conclusion

In light of these findings, it is evident that the Irish Financial Services sector faces challenges on its path to sustainability reporting and disclosure. However, these challenges also present opportunities for growth, innovation, and leadership in sustainable finance.

To successfully navigate this journey, financial institutions would be well served to focus on several key actions, with training at the forefront:

Data Refinement: Enhancing data granularity and the timeliness of disclosures is fundamental. This not only ensures compliance but also enables better decision-making.

Harmonisation with International Standards: Bridging the gap between international and EU directives on sustainability reporting is essential. Creating a harmonised approach requires a deep understanding of evolving standards.

Integration of Sustainability into Risk Management: Embedding sustainability metrics within risk management structures is not just a compliance issue but a strategic imperative.

Continuous Regulatory Adaptation: The dynamic regulatory landscape, both within Ireland and the broader EU, calls for ongoing adaptability and knowledge enhancement.

Resource Allocation: Balancing the dual pressures of regulatory obligations and investor expectations requires thoughtful resource allocation and planning.

Stakeholder Engagement: Engaging with stakeholders, from investors to the public, is critical. Transparent, high-quality data disclosure is a powerful tool for better decision-making and communicating a genuine commitment to sustainability.

By embracing these recommendations and placing a strong emphasis on training and skill development, the Irish Financial Services sector can achieve several vital objectives. It can build credibility, enhance transparency, and communicate a sincere dedication to sustainability. This proactive approach aligns perfectly with global efforts to promote responsible investment and foster sustainable market transformation while safeguarding against the pitfalls of greenwashing.

In this era of sustainable finance, the Irish Financial Services sector stands at the forefront of an industry-wide transformation. By heeding the lessons learned from this analysis and investing in training and capacity building, it is not only well-equipped but well-positioned to not just survive but thrive in a sustainable future. The challenges it faces today are stepping stones toward a brighter, more resilient, and environmentally responsible financial landscape for tomorrow.

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Commissioned by

INTERNATIONAL SUSTAINABLE FINANCE CENTRE OF EXCELLENCE

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Prepared by:

DAVY

The International Sustainable Finance Centre of Excellence is co-funded by Skillnet Ireland and participating businesses. Skillnet Ireland is funded from the National Training Fund and the European Union through the Department of Further and Higher Education, Research, Innovation and Science.

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Co-funded by the European Union