9 Appraisal of rail project investments

9.1 Public capital projects are typically high cost and high risk, but have the potential to provide socioeconomic benefits and services over the long term. To manage the key project risks — delay, cost overruns, under delivery, unplanned redundancy — and to ensure that available investments are mainly directed to projects that deliver the highest value — i.e. to maximise the benefits-to-cost ratio — complex appraisal and decision making processes for public capital projects have developed. A key principle in that process is the avoidance of premature commitments.

9.2 The *Public Spending Code* (the Code) — first published by the Department of Public Expenditure, National Development Plan Delivery and Reform (the Department of Public Expenditure) in September 2013 — is the set of rules, procedures, and guidance designed to ensure value for money in public expenditure. It imposes obligations on all public organisations about how they spend public money, and provides guidance on how to comply with those obligations. This includes a framework dealing with the appraisal and management of capital projects, including investments in public infrastructure.

9.3 The capital appraisal and management processes in the Code have been updated on a number of occasions since 2013.

- December 2019 — the concept of the 'project lifecycle' was expanded to reflect the realities of project delivery, requiring each investment proposal to progress through a six-stage project lifecycle, subject to approval.[1]
- November 2021 — the *Public Spending Code* was updated to include the requirement for an external assurance process for major public investment projects costing in excess of €100 million.
- March 2023 — interim update of the *Public Spending Code* requirements which included, *inter alia*, an increased threshold, from €100 million to €200 million, for projects requiring specific Government consent.[2]
- December 2023 — *Infrastructure Guidelines* issued, with an effective date of 1 January 2024, replacing the *Public Spending Code* for capital projects. The guidelines, *inter alia*, reduce the number of project approval stages and streamline the requirements for major projects.

9.4 While the core ideas and controls remain in place, the *Infrastructure Guidelines* change key project thresholds and associated processes. For example, proposals with an estimated cost in excess of €200 million are now considered major projects and are subject to the following appraisals at key project decision points[3]

- an ***external assurance process*** at the strategic assessment and preliminary business case stage of the project (approval gate 1)
- ***review by the Major Projects Advisory Group*** at the preliminary business case stage of the project (approval gate 1)[4]
- ***consideration by Government*** at the preliminary business case (approval gate 1) and final business case stage of the project (approval gate 3).

1 The six stages that define the project lifecycle are: strategic assessment, preliminary business case, final business case, implementation, review, and ex-post evaluation.

2 The Department of Public Expenditure set out a number of actions with immediate effect amending the *Public Spending Code* pending the Code's replacement by the *Infrastructure Guidelines*.

3 The previously used term 'decision gate' has been renamed 'approval gate' in the *Infrastructure Guidelines.*

4 The Major Projects Advisory Group was established in December 2021 to further strengthen project management and to assist the Department of Public Expenditure in its project assurance role.

Focus of this examination

9.5 This examination was undertaken to review the application of the *Public Spending Code* capital project appraisal requirements in the public transport sector. Two multi-annual projects of different scale were examined in this respect: the MetroLink railway project and the Limerick to Foynes freight line project (the Foynes project). The examination also considered the impact of the changed requirements for capital expenditure introduced by the *Infrastructure Guidelines.*

9.6 The examination team reviewed a range of documentation in relation to both projects to assess compliance with the *Public Spending Code* appraisal requirements. The examination team also interviewed staff from the Department of Transport (the Department), the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII).

Roles and responsibilities under the Public Spending Code

9.7 The *Public Spending Code* sets out the roles and responsibilities of the key stakeholders involved in public investment projects (see Figure 9.1).

9.8 The ***Department of Public Expenditure's*** responsibility for overseeing effective and efficient public investment includes maintenance of the national frameworks within which departments operate, to ensure appropriate accounting for and value for money in public expenditure (for example the *Public Spending Code*).[1] Under the 2019 Code, the Department of Public Expenditure undertook technical reviews of strategic assessment and business case reports for major projects with an estimated cost of over €100 million submitted by the relevant approving authorities. This was replaced by independent expert reviews in the November 2021 update of the Code.

9.9 The relevant ***parent (or line) department*** for a major capital investment is required to ensure that it, and bodies under its aegis, fully comply with the *Public Spending Code*.[2] This may include drawing up their own sector-specific procedures for evaluating, planning and managing public investment which align with the Code.

9.10 For the purposes of appraising and delivering public investment at an operational level, the two key actors are the 'approving authority' and the 'sponsoring agency'

- the ***approving authority*** has ultimate responsibility for the project
- the ***sponsoring agency*** has primary responsibility for evaluating, planning and managing public investment projects within the parameters of the *Public Spending Code*.[3,4]

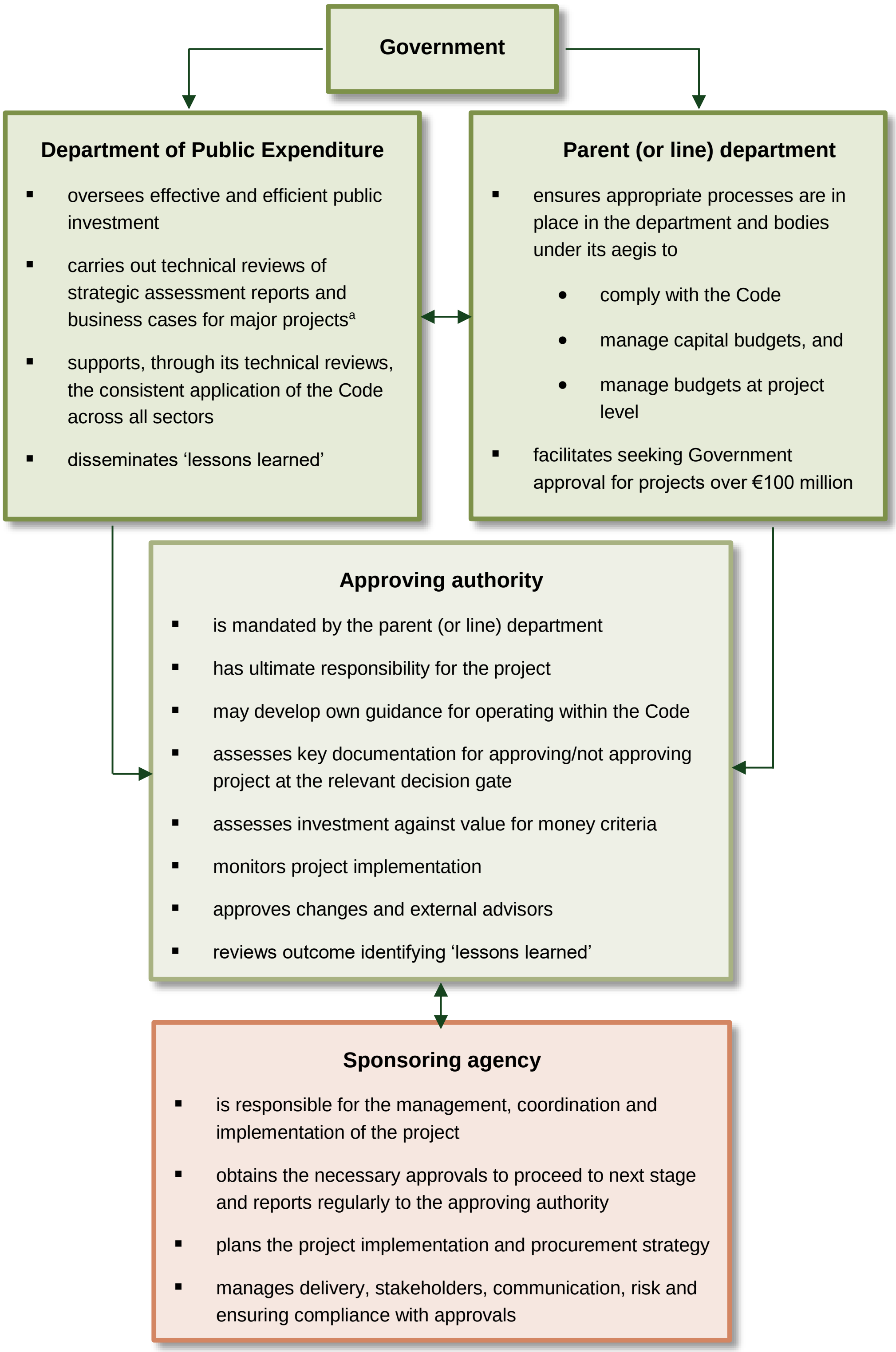
1 It is the responsibility of each Accounting Officer to ensure the efficient and effective use of public expenditure within the relevant Vote.

2 The Code provides for a degree of proportionality in the application of its requirements commensurate with the scale of the proposal under consideration.

3 The sponsoring agency may be a Government department, local authority, state agency, higher education institute, cultural institution or other state body.

4 Where the Office of Public Works (OPW) is undertaking a project on behalf of a Government department or office, it is the responsibility of the relevant approving authority to clarify with the OPW at an early stage who the sponsoring agency is and to clearly set out responsibility for project roles.

Figure 9.1 Capital project roles and responsibilities defined in the *Public Spending Code*



Source: *Public Spending Code: A Guide to Evaluating, Planning and Managing Public Investment,* 2019. Analysis by the Office of the Comptroller and Auditor General.

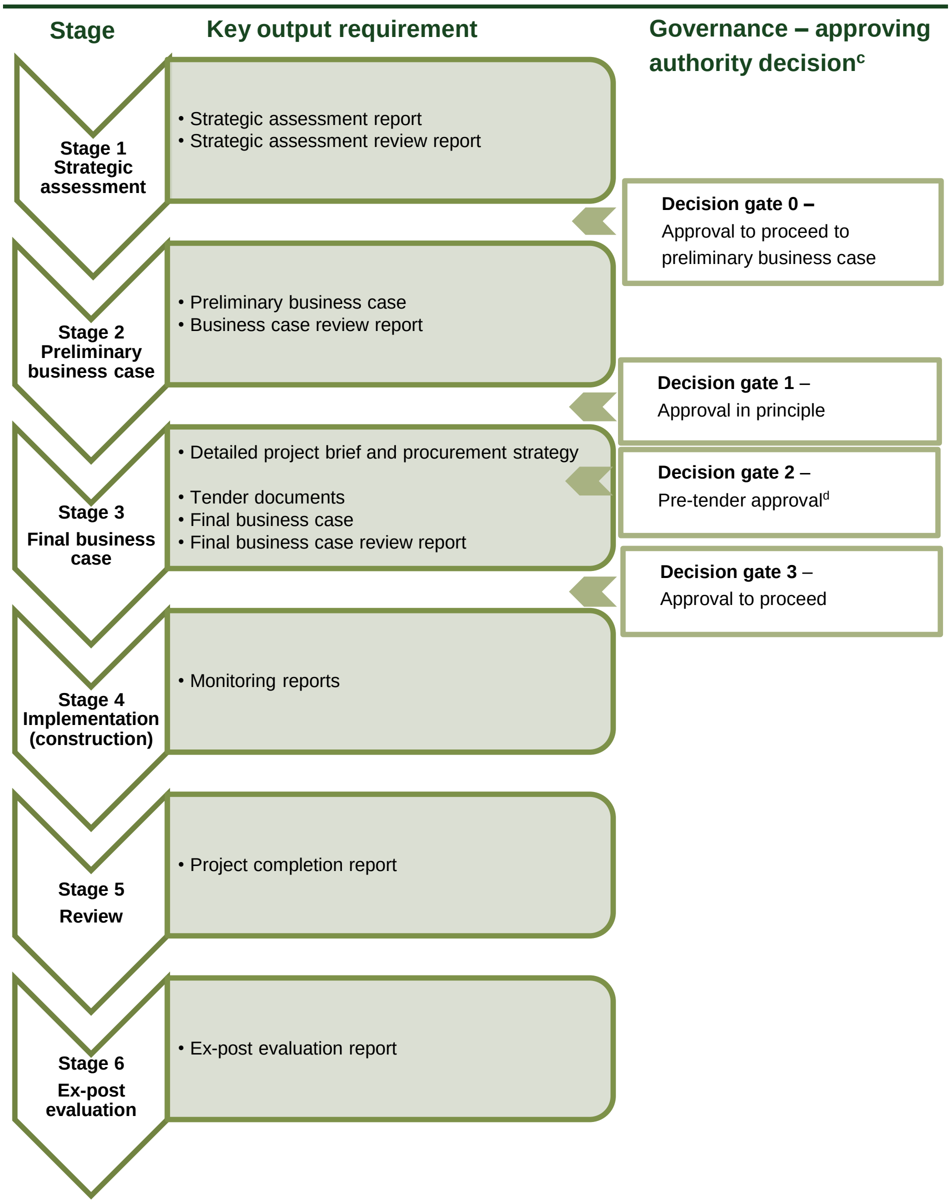
Note: a The Department of Public Expenditure's technical reviews of the strategic assessment report and business cases were replaced by independent expert reviews in the November 2021 update of the Code.

Project lifecycle and decision gates

9.11 The *Public Spending Code* prescribes a number of incremental steps (or stages) aimed at assessing the financial and economic viability of projects, which must be undertaken prior to the approval of capital investment commitments.

9.12 Approval to proceed to the next stage of the project lifecycle process should only take place when the relevant stage requirements have been met (see Figure 9.2).

Figure 9.2 Project lifecycle[a,b]



Source: *Public Spending Code: A Guide to Evaluating, Planning and Managing Public Investment*, 2019. Analysis by the Office of the Comptroller and Auditor General.

Notes:
a For projects with an estimated capital cost of less than €10 million, approving authorities may commence the process at stage 2 (decision gate 0) — see Figure 9.3 for more information.
b For projects with an estimated cost of €100 million, the preliminary and final business cases, the review and project completion reports, and the ex-post evaluation report must be published.
c Under the Code, the approving authority has ultimate responsibility for the project.
d The detailed project brief and procurement strategy must be submitted to the approving authority at decision gate 2 for approval to proceed to tender.

9.13 The value of the proposed investment determines when, in the project lifecycle, the approving authority is required to approve progression to the next stage (see Figure 9.3).

Figure 9.3 Approval thresholds under the 2019 *Public Spending Code*

Approval threshold[a]	Approving authority — key responsibilities under the Code[b]
Less €10 million	The approving authority ▪ may commence the process at stage 2 (i.e. after decision gate 0) — a strategic assessment report is not required, but the preliminary business case must clearly document the strategic case, rationale and objectives of the proposal ▪ should engage with the sponsoring agency as to whether an economic appraisal is required and the nature of such appraisal[c] ▪ is not required to conduct *ex-post evaluations* on all projects — review of a representative sample of projects is sufficient.
Between €10 million and €100 million	The approving authority may, without recourse to the Department of Public Expenditure, undertake ▪ the technical review of the strategic assessment report ▪ the preliminary business case and ▪ the final business case.
Over €100 million	The approving authority is the Government, but the day-to-day functions (of the approving authority) must be carried out by the relevant public body funding the project. In this capacity, the funding public body ▪ should forward the strategic assessment report, the preliminary business case, and the final business case to the Department of Public Expenditure for technical review in advance of the relevant decision[d] ▪ should seek Government approval to proceed, through a Government 'memorandum for decision', at the following stages • preliminary business case — decision gate 1 (approval in principle) • design, planning and procurement — decision gate 2 (approval to proceed to tender) • final business case — decision gate 3 (approval to award the contract)[e] ▪ is required to ensure that a separate project challenge and assurance mechanism takes place.[f]

Source: *Public Spending Code: A Guide to Evaluating, Planning and Managing Public Investment*, 2019

Notes:
a The financial thresholds relate to the full capital cost estimates of projects including all elements — land costs, value added tax, professional fees, etc.
b Not all of the approving authority's responsibilities are listed.
c The sponsoring agency has primary responsibility for evaluating, planning and managing public investment projects within the parameters of the Code and obtaining the necessary approvals from the approving authority at each point in the process.
d The technical reviews of the business cases were replaced by independent expert reviews in the November 2021 update of the Code.
e It is the responsibility of the parent department to facilitate seeking Government approval for bodies under its aegis where it is not the approving authority.
f The Code noted that a separate project challenge and assurance mechanism would be introduced as part of the ongoing reform of the public investment management system.

MetroLink railway project

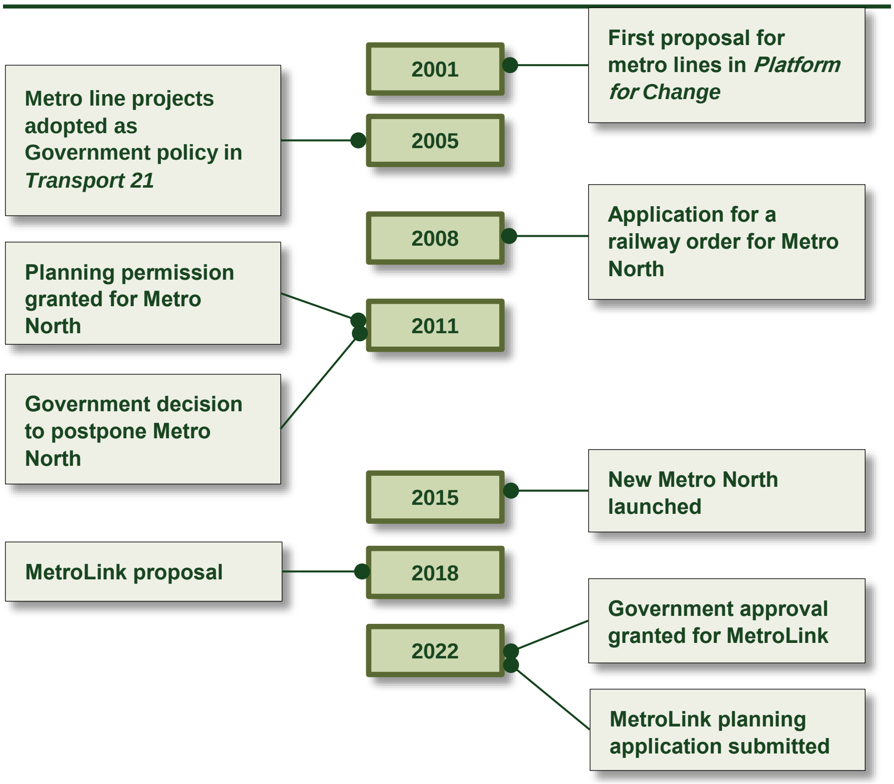
9.14 A metro system for Dublin has been proposed, in various forms, over a period of at least 20 years (see Figure 9.4). However, in response to the economic downturn between 2008 and 2010 and subsequent fiscal constraints, the project was deferred indefinitely in November 2011.

9.15 In September 2015, it was announced that a revised metro project — New Metro North — was being launched, with a projected opening date of 2026/2027.[1] Following further development of options, the NTA announced in March 2018 revised proposals for the former planned Metro North and Metro South to proceed as one project known as MetroLink.[2]

9.16 In January 2020, the Department informed Government that it would establish a Major Projects Governance Oversight Group (MPGOG) and ensure an independent review of business cases to strengthen the governance arrangements for projects with an estimated cost of over €100 million, including MetroLink.[3]

9.17 The NTA (as the day-to-day approving authority for the project) submitted a draft preliminary business case for MetroLink to the Department and MPGOG in March 2021. An updated business case was submitted to the Department by the NTA in November 2021. This business case was submitted to the Department of Public Expenditure in May 2022 for review by the Major Projects Advisory Group (MPAG). An independent review of the business case was also undertaken by an EU technical unit (referred to as JASPERS) in the context of the potential receipt of EU funding for the project.[4] Both the MPAG and JASPERS reviews have been published on the NTA's website.

Figure 9.4 Metro system timeline, 2001 to 2022



Source: Analysis by the Office of the Comptroller and Auditor General

1 The new project was recommended by a NTA commissioned Fingal/North Dublin Transport Study. The recommendations from the study informed the NTA's *Transport Strategy for the Greater Dublin Area 2016 – 2035.*

2 Metro West was not included in the NTA's *Transport Strategy for the Greater Dublin Area 2016 – 2035.*

3 The MPGOG sits within the Department and is tasked with, *inter alia*, advising the Minister for Transport on major projects especially in relation to Ministerial and Government approvals required at the relevant decision gates under the Code.

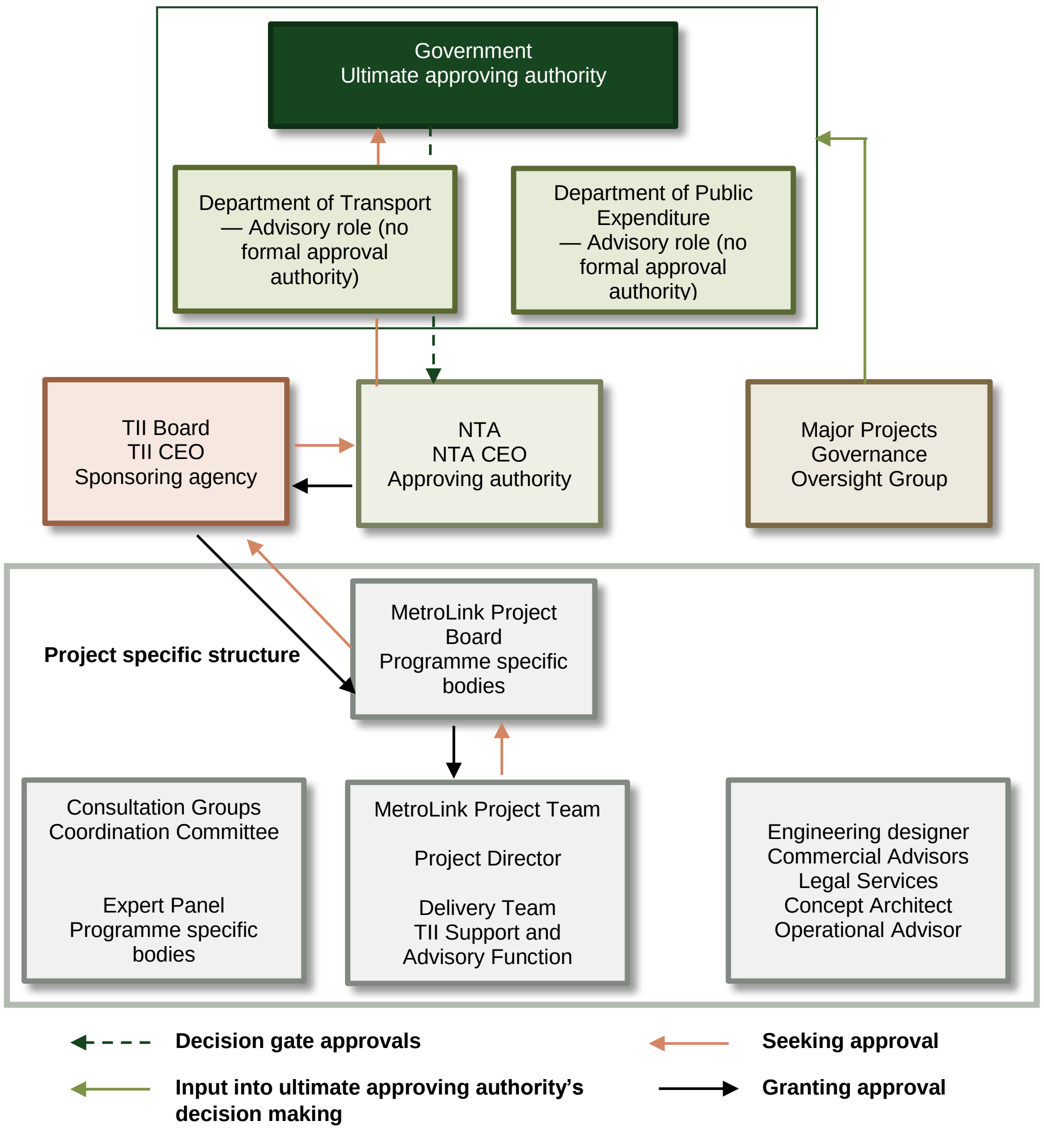
4 The Joint Assistance to Support Projects in European Regions (JASPERS) advises on strategies, programmes and projects for investments supported by EU grant funds, with the aim of "promoting growth and paving the way to a smarter, greener and more connected Europe".

9.18 In July 2022, the Government granted approval in principle for the project to proceed to planning stage (i.e. approval gate 1). TII (as sponsoring agency for the project) applied for planning permission in September 2022.[1] A decision has yet to be received. The next stage for the project is a pre-tender stage which will require Ministerial approval (i.e. approval gate 2).

MetroLink governance structure

9.19 Given the scale, complexity and number of state bodies involved in MetroLink, a programme governance framework has been put in place, which is designed to allow timely decision making by streamlining information flows and allocating authority appropriately (see Figure 9.5).

Figure 9.5 MetroLink governance structure[a,b]



Source: Transport Infrastructure Ireland, MetroLink Governance Framework, September 2020

Notes: a The separation of the approval and reporting flows highlights the difference between the approval relationships mandated by the 2019 *Public Spending Code* and the day-to-day reporting structure for the state bodies involved; and the programme specific structures.

b The governance structure reflects the 2019 *Public Spending Code* requirements.

1 Transport Infrastructure Ireland is the sponsoring agency for the MetroLink project. The planning permission sought involved the submission of a railway order application.

Projected cost

9.20 Total spend on Metro North up to the point in 2011 where the project was postponed was €166 million. Only around €6 million of that expenditure, for properties acquired as part of the project, continues to have potential value for MetroLink. The remaining €160 million was written off as 'sunk costs'. Expenditure of €18.7 million on Metro West, together with expenditure of €46 million (of the €48.6 million incurred) on the related original DART Interconnector project have also been written off. The total write-off on the three related projects is around €225 million of Exchequer funding.

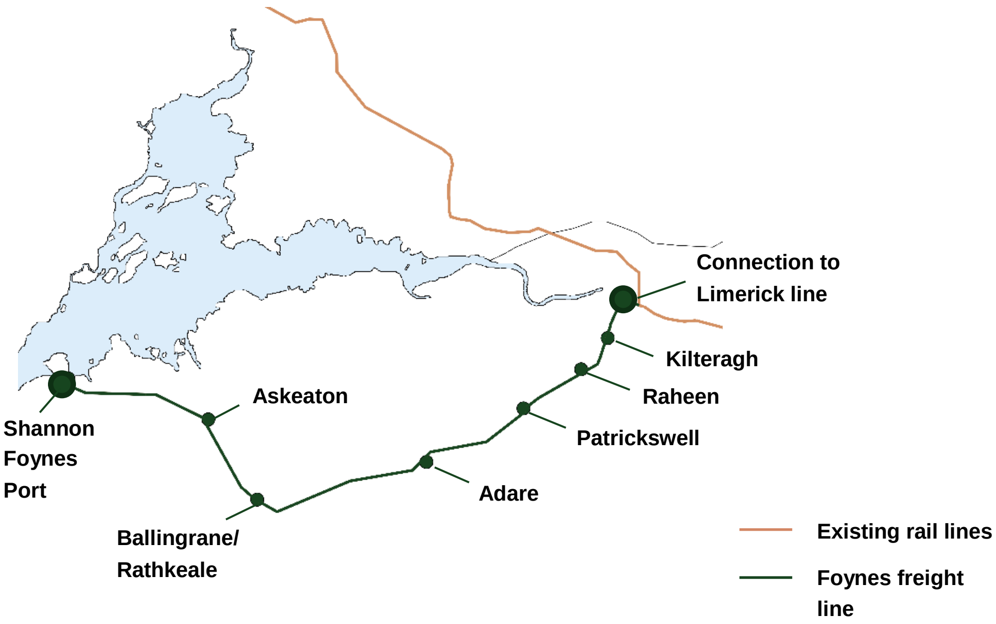
9.21 The preliminary business case for MetroLink, which was approved in July 2022, included an initial cost estimate of between €7.2 billion and €12.3 billion (excluding VAT in 2021 prices).[1] Expenditure of around €181 million has been incurred on MetroLink up to end-July 2024.

9.22 The Department has stated that an updated cost range will be provided at approval gate 2 (Ministerial approval to proceed to tender), which will reflect recent inflation experienced in the construction industry. It noted that a more definitive cost estimate will only be known after the procurement stage, and that a total budget and target cost proposal will then be brought to Government for consideration (approval gate 3 of the *Infrastructure Guidelines*).

Limerick to Foynes freight line project

9.23 The reinstatement of the disused single-line Limerick to Foynes railway line was proposed in the *National Development Plan/Project Ireland 2040* as part of the planned investment to expand capacity at Shannon Foynes port (see Figure 9.6).[2]

Figure 9.6 Limerick to Foynes freight line



Source: Iarnród Éireann

1 The Major Projects Advisory Group review noted potential upper range cost estimates of €23.4 billion.

2 The reinstatement of the railway line is required to maintain Foynes Port's Tier 1 status on the EU's trans-European Transport Network (TEN-T), and for Ireland to meet its TEN-T obligations in having rail connectivity to all of its three Tier 1 ports by 2030.

9.24 The project sponsor for the Foynes rail link project is Iarnród Éireann, which is responsible for delivery of the project. Initially, the Department of Transport, as lead funder, was the approving authority for the project. In April 2023, the NTA was appointed the approving authority.

9.25 The Foynes project has been organised in two construction phases.

- ***Phase 1 track and civils*** involves, *inter alia*, the clearance of vegetation and removal of existing track; replacement of the track formation and installation of a new ballast bed to current Iarnród Éireann standards; the rehabilitation and/or renewal of bridges and culverts; installation of new rail and concrete sleepers; and installation of infrastructure to accommodate the next phase of the project.
- ***Phase 2 operational readiness*** involves making the line operational, including signalling, train radio, road level crossings, and connections to the national rail network.

Phase 1 approval

9.26 The Foynes project had an initial projected cost of €42 million, subject to tender, for the phase 1 rehabilitation works. Iarnród Éireann commenced a tender competition for the phase 1 works around mid-2022, and in July 2022 proposed that financial support be provided for the phase 1 works from the land transport expenditure programme (Programme B) of Vote 31 Transport.

9.27 The Department set out in a submission to the Minister in September 2022 that it had not received definitive estimates from Iarnród Éireann on the total cost of reopening the Foynes freight line, but that a prudent estimate at that time suggested a total cost of between €150 million and €200 million, and possibly slightly more given the (then) inflationary environment. However, the Department agreed, subject to the Minister's approval, that funds could be issued to Iarnród Éireann on an exceptional basis as the proposed works were consistent with the type of protection and renewal works on existing rail lines typically funded under the Infrastructure Manager Multi-Annual Contract programme.[1]

9.28 In a further note to the Minister in October 2022, the Department expressed serious concern about the process underpinning the Foynes project, noting that the project seemed to have become a multi-annual, significant capital expenditure project to be delivered over three years, in the absence of any visibility on the overall project cost. The Department's observations were based on revised project costs submitted by Iarnród Éireann in respect of phase 1, which had increased to €104 million following receipt of tenders (i.e. around 2.5 times the previous estimate). The Department pointed out that the project had not been subject to any detailed appraisal.

9.29 The Department issued capital funding of €64 million from Vote 31 to Iarnród Éireann for phase 1 of the Foynes project on 6 December 2022. On 14 December 2022, Iarnród Éireann entered into a contract to deliver the phase 1 works, with a two-year (100-week) work programme.

Phase 2 approval

9.30 When the NTA was appointed by the Department as the day-to-day approving authority for the Foynes project (in April 2023), it took on responsibility for the overall project, including consideration of the phase 2 investment.

1 Capital funding from Vote 31 Transport to Iarnród Éireann is governed by a five-year contract — the Infrastructure Manager Multi-Annual Contract (IMMAC) — between the Minister and Iarnród Éireann. The IMMAC assigns responsibility to Iarnród Éireann for the maintenance and renewal of the existing rail network. In November 2019, the Government approved the IMMAC in line with the funding commitments set out in *Project Ireland 2040*.

9.31 As the Department recognised, during the initial planning of the project in 2022, neither a strategic assessment report nor a preliminary business case had been developed. This is not compliant with the *Public Spending Code* requirements for such projects.

9.32 A final business case for the project, prepared by Iarnród Éireann, was produced in November 2023. At that stage, the project's phase 1 track rehabilitation works had already commenced and were half way through the planned construction period.

9.33 The financial projections set out in the business case included the costs of both phases of the project. The total projected capital cost of the Foynes project as outlined in the business case is around €152 million.[1]

9.34 The projected benefits to be delivered by the project primarily relate to improving business and freight user access to Foynes Port, and wider community benefits from reduced land transport freight flows.

9.35 On 15 December 2023, based on the business case, the Board of the NTA provisionally approved the Foynes project for funding. However, the detailed design report submitted for the project — required under the NTA's internal guidelines for project appraisal approvals — was not considered satisfactory. The design requirement for project approval was met in July 2024, when Iarnród Éireann submitted an addendum to the original design report. The NTA issued its formal approval for the Foynes project, permitting commencement of phase 2 of the project, to Iarnród Éireann in July 2024.

9.36 The phase 2 works are being undertaken through existing Iarnród Éireann contracting arrangements rather than any new single works contract. The planned completion date for the full Foynes project is December 2025.

9.37 The phase 1 budgeted costs of around €105 million are being funded by the Department from Vote 31, while funding for the delivery of phase 2 will be provided by the NTA. By end-July 2024, total expenditure of €78 million had been incurred on the project, of which €74.5 million related to phase 1 expenditure.

9.38 The Department has stated that, in the interests of transparency, the Minister informed the Government of the NTA's decision on the final business case for the project in early July 2024.

9.39 The NTA is required to inform the Department if, at any stage, it becomes apparent that the Foynes project cost is likely to exceed €170 million, on the basis this would be relatively close to the €200 million threshold for major project status.

Project appraisal compliance

9.40 The examination team's assessment of the project appraisal process for the MetroLink and Foynes projects for compliance with the *Public Spending Code* requirements is summarised in Figure 9.7. The assessment was undertaken against the relevant Code requirements in place at each stage of the project lifecycle.

1 Iarnród Éireann has assumed that all VAT incurred on the project will be recoverable and therefore does not form part of the project's cost.

Figure 9.7 Compliance with project appraisal process

Project stage	MetroLink	Foynes
Stage 1 Strategic assessment		
Strategic assessment report	🟢[a]	🔴
Strategic assessment report review	🟢[a]	🔴
Decision gate 0 — Approval to develop preliminary business case	🟢	🔴
Stage 2 Preliminary business case (to be published)		
Preliminary business case	🟢	🔴
External group review	🟢	🔴
Business case review report	🟢	🔴
Decision gate 1 — Approval in principle	🟢	🔴
Stage 3 Final business case (to be published)		
Compile detailed project brief and procurement strategy	N/A[b]	🟡
Decision gate 2 — Pre-tender approval	N/A[b]	🔴
Updated final business case	N/A[b]	🟡[c]
Final business case review report	N/A[b]	🟡
Decision gate 3 — Approval to proceed	N/A[b]	🟡
Stage 4 Implementation (construction)		
Award contract	N/A[b]	🟡
Regular monitoring reports	N/A[b]	🟡
Complete project	N/A[b]	N/A[b]
Stage 5 Review and project completion report (to be published)	N/A[b]	N/A[b]
Stage 5 Ex-post evaluation and report (to be published)	N/A[b]	N/A[b]

🟢 In compliance 🟡 Partial compliance 🔴 Not in compliance

Source: Analysis by the Office of the Comptroller and Auditor General

Notes:
a Project appraisal plan prepared by TII in May 2019 and reviewed by the Department of Transport in June 2019 under the 2013 *Public Spending Code*.
b N/A as project has not yet reached this stage on the project lifecycle.
c While a final business case was prepared in November 2023, it should have been prepared and published prior to the full project commencing.

9.41 The MetroLink project demonstrates compliance with the *Public Spending Code*. It is noted that

- the governance structure for the project aligns with the Code's requirements and the overall governance structure framework sets out clearly the roles and responsibilities for the MetroLink project
- the project's preliminary business case was reviewed by the Department's MPGOG, the Department of Public Expenditure's MPAG and JASPERS
- the preliminary business case and the JASPERS and MPAG reviews have been published on the NTA's website
- the Department of Transport facilitated and received the required Government approval at decision gate 1.

9.42 By comparison, the examination team's assessment identified a high level of non-compliance with the Code for the Foynes project.

- The original governance structure was not set up in accordance with the Code requirements. The Department acted as approving authority until the NTA was appointed to the role in April 2023. Also, the Department's MPGOG did not have any oversight of the project.
- The first key appraisal document for the project was the final business case, which was only prepared after the NTA assumed the role of approving authority. Neither a strategic assessment report nor a preliminary business case was prepared for the project, and the required independent expert reviews were not carried out. Government approval in principle (decision gate 1) or ahead of tendering (decision gate 2) was not sought for a project expected to cost over €100 million.
- The final business case had not been prepared and/or published at the time the project commenced. Due to the delayed preparation of the business case, its publication is no longer required under the Code requirements in place at the time of its approval.
- Funds for the project were allocated in the absence of the key documents required at the appraisal/planning stage.
- The procurement process for phase 1 of the project commenced in July 2022 in the absence of any clarity on the overall programme cost, and without detailed appraisal documentation.
- The first project monitoring report was completed in November 2023, even though the construction stage commenced in December 2022.

Conclusions

9.43 Complex appraisal and decision-making processes have developed over time to manage project risks and to ensure that available investments are mainly directed to projects that deliver the highest value. The *Public Spending Code* — first introduced in 2013 and amended on a number of occasions since, up to its replacement by the *Infrastructure Guidelines* in January 2024 — sets out the rules and procedures to be followed to try to ensure that the best possible value for money is obtained whenever public money is spent. The governance structure set out in the Code aims to ensure clear oversight and control of a project throughout its lifecycle.

9.44 In the transport sector, the role of approving authority for public transport projects, at an individual project level, is performed by the National Transport Authority (NTA). The delivery of the MetroLink project is the responsibility of Transport Infrastructure Ireland (TII) while delivery of the Foynes project is the responsibility of Iarnród Éireann as the designated sponsoring agencies.

MetroLink railway project

9.45 Notwithstanding the protracted process to arrive at the current project proposal, the MetroLink project demonstrates appropriate compliance so far with the relevant capital investment appraisal requirements. The MetroLink preliminary business case was prepared by TII as sponsoring agency, approved by the NTA as approving authority, and submitted to the Department in March 2021. The required departmental and external reviews of the documents were completed. In July 2022, the Government granted approval in principle (at decision gate 1) for the project to proceed to planning stage.

9.46 The current revised requirements in the *Infrastructure Guidelines* are being followed for the MetroLink project. External assurance at the (now combined) strategic assessment and preliminary business case stage was received.

Limerick to Foynes freight line project

9.47 The Foynes project currently has an estimated cost of around €152 million over two project phases, both of which must be delivered before the investment will yield any benefits. A number of the key requirements of the *Public Spending Code* were not complied with in respect of the project. Voted funds totalling €64 million were issued to Iarnród Éireann in December 2022 prior to any detailed appraisal of the project being undertaken. At the time, Government approval to proceed was required under the Code for a project costing over €100 million, but this was not sought.

9.48 Changes to the Code requirements effective from March 2023 increased the threshold for major projects from €100 million to €200 million. As a result, Government approval for the Foynes project — projected to cost a total of €152 million — was no longer required.

9.49 A final business case for the Foynes project was prepared in November 2023 by the sponsoring agency, Iarnród Éireann. In July 2024, the NTA gave its formal approval for the commencement of the second and final phase of the project, at a cost of €47 million. The €105 million phase 1 works were already well advanced at this stage, and there was a significant risk that those works would have been of little or no value if phase 2 of the project had not been approved.

9.50 In recognition that the Foynes project had required Government approval under the 2019 *Public Spending Code* when it commenced, and to aid transparency, the Minister brought the NTA's decision on the final business case to the Government for information in early July 2024.

Infrastructure Guidelines

9.51 The *Infrastructure Guidelines* requirements are likely to be less onerous on public bodies, with the number of project approval stages reduced from five to three and the number of formal decision points reduced from four to three. Stage 1 (strategic assessment) and stage 2 (preliminary business case) under the *Public Spending Code* have merged into one stage (strategic assessment and preliminary business case).

9.52 The key documents required under the *Infrastructure Guidelines* are broadly similar to those required under the *Public Spending Code*. There are some differences — the strategic assessment now forms part of the preliminary business case; the detailed project brief and procurement strategy has been replaced by a detailed business case, project execution plan and procurement strategy.

9.53 The *Public Spending Code* did not explicitly require climate impacts to be considered at any stage of the project lifecycle. Under the *Infrastructure Guidelines*, climate impacts have to be considered as part of the preliminary business case whereby a review of climate related outcomes attributable to the project must be set out.[1] Also, there is a requirement for the climate resilience of the project to be assessed.

9.54 For major projects — those estimated to cost over €200 million — the relevant approving authority is now required to seek Government consent for approval at two stages — the preliminary business case (stage 1) and post-tender/final business case stage (stage 3).

9.55 Also, the external assurance and the Major Projects Advisory Group reviews are now formalised as a requirement for major projects at the preliminary business case stage, prior to Government consent for approval.

1 The MetroLink preliminary business case and Foynes final business case considered both the climate action plan and the UN sustainable development goals.