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Department of Public Expenditure Infrastructure
Public Service Reform and Digitalisation

Best Practice KPI Guidance

For Regulators of Critical Infrastructure

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1. Introduction

In December 2025 Government published the Accelerating Infrastructure Action Plan and Report (AIRAP) to respond to urgent challenges in delivering infrastructure despite record investment and planning reforms. The report highlights the complexity of the Irish regulatory landscape as a key barrier to the fast delivery of critical infrastructure and sets out a suite of actions that aim to reduce unnecessary regulatory burden. These actions seek to minimise time and cost impacts on infrastructure delivery and support reform throughout the process.

Having clarity on how long regulatory processes take and the context within which regulatory bodies operate is important - for understanding the impact of reforms introduced, ensuring resources are allocated efficiently, and providing certainty to stakeholders in the regulatory space.

In addition, it is important to facilitate transparency in the regulatory environment. Transparent regulation ensures that requirements, decision-making processes, and timelines are clear and accessible to all stakeholders. Transparency builds confidence in the regulatory system, reduces uncertainty, and supports informed project planning.

Clarity and transparency can be facilitated through the setting, monitoring and reporting of Key Performance Indicators (KPIs) by regulatory bodies involved in the infrastructure delivery process. Coherently and consistently tracking KPIs against ambitious, realistic targets is essential to ensure transparency, identify bottlenecks, tracking timelines and measure the impact of reforms.

2. Purpose of this Guidance

This document sets out best practice guidance for Public Sector Bodies in setting, monitoring and reporting KPIs and other metrics to support clarity, coordination and standardisation in the regulatory environment for infrastructure delivery. This guidance seeks to act as a useful tool for regulators in streamlining processes and monitoring reforms.

Coherent and regular tracking of KPIs facilitates the assessment of regulatory processes to understand how they influence project delivery timelines. KPIs are particularly important for understanding the impact of reforms to accelerate the delivery of infrastructure, facilitating learnings, and identifying where bottlenecks persist. Reporting on KPIs in a timely and standardised manner also facilitates transparency and accountability in infrastructure delivery.

The publication of this guidance supports the completion of Action 9 of the AIRAP, which necessitates the development, and issuance of Government guidance to regulatory bodies on

improving the coordination and standardisation of regulatory approvals for critical infrastructure, incorporating key performance metrics.

This guidance supports Circular 18/2026 - *Circular on Principles for Better Regulation*[1] *for Critical Infrastructure*, published under Action 11 of the AIRAP, which calls for fixed timelines for every regulatory process and the tracking and measuring of timelines for processes and consents, supported by appropriate KPIs[2].

The Guidance includes:

- Best practice principles for setting KPI targets
- Types of KPIs and metrics that improve clarity for stakeholders and enhance understanding of the impacts of regulatory reforms for critical infrastructure
- Best practice approaches to KPI and metric reporting

This Guidance reflects international best practice and was informed by research undertaken on KPI processes and guidance in other jurisdictions and at the EU level. Further detail can be found in Appendix A to this document.

All Public Sector Bodies involved in the licencing, consenting and permitting processes for critical infrastructure should consider this best practice guidance in setting and tracking KPIs and metrics associated with their processes. This guidance does not seek to impact the decision of independent regulatory bodies but may provide some useful considerations in the design and streamlining of processes.

3. Principles for Setting KPI Targets

The European Commission describes a KPI as a 'measurable metric or data point that provides a clear and specific representation of a particular aspect of the permitting process. The primary purpose of a KPI is to quantify the performance, progress, or efficiency of a given process, thereby supporting decision-making, monitoring, and benchmarking efforts.'[3]

[1] https://assets.gov.ie/static/documents/5578f6ba/Circular_18_of_2026_-_Principles_for_Better_Regulation_for_Critical_Infrastructure.pdf

[2] While the KPIs outlined in this guidance capture outputs related to processes underpinning infrastructure delivery, Public Bodies should also be aware of Circular 24/2026 on the Benefits Realisation Framework, which provides guidance on reporting on the delivery of infrastructure with relevance to people's day to day lives.

[3] https://op.europa.eu/o/opportal-service/download-handler?identifier=5a20da93-11f8-11f1-8870-01aa75ed71a1&format=PDF&language=en&productionSystem=cellar

To effectively track performance, KPIs should be measured against a target or goal. This enables both static and dynamic trend tracking. Therefore, it is important for regulatory bodies to ensure that KPI targets and benchmarks that they set for their processes and operations are ambitious and aligned with the AIRAP objectives.

KPIs and the associated goals should be standardised and compared against the same framework, such as the SMART+C framework; Specific, Measurable, Actionable, Relevant, Time-bound + Comparable[4]. Regulators should assess their KPIs and targets against the selected framework. The SMART+C framework includes:

Specific

This emphasises the need for a clear goal/objective. It is important that it is not unambiguous, and it answers the question of what you want to achieve

Measurable

There needs to be concrete criterion for measuring the progress towards the set goal. If the objective is not measurable, progress cannot be tracked.

Achievable

The target objectives must be attainable. It is important that the targets set are ambitious but also feasible. It should be realistically achievable, considering the resources available.

Relevant

The goals must align with the objectives of the broader priorities - in this case it would be accelerating delivery of infrastructure and the actions/KPIs in AIRAP. The sample KPIs referenced in Section 4 below are some of those which are relevant to the accelerating infrastructure delivery.

Time Bound

A timeline/timeframe attached to the goals is important for contextualising and measuring the progress on a goal.

Comparable

It is important for tracking and standardisation that the KPIs are comparable to allow progress and overall efficiency across the system and different regulators to be understood.

[4] This framework was also used in European Commission report on '[Monitoring progress of measures to streamline permit-granting procedures]'.

In setting and monitoring KPIs related to regulatory processes for infrastructure delivery, regulatory bodies should also bear in mind the Principles for Better Regulation outlined in Circular 18/2026:

- Necessity
- Effectiveness
- Proportionality
- Coherence
- Efficiency
- Timebound
- Transparency
- Accountability

4. Sample Key Performance Indicators

To support an effective regulatory system that allows for the acceleration, coordination and standardisation of regulatory approvals for critical infrastructure, relevant stakeholders should have a clear understanding of the timelines and steps involved in each regulatory process, and the environment within which regulatory bodies are operating (e.g. how many applications they have on hand).

4.1. KPIs Relevant to the Acceleration of Infrastructure Delivery

To adhere to the principles of transparency and timebound processes, as outlined in the Principles for Better Regulation for Critical Infrastructure Circular, regulatory bodies should be able to demonstrate the following KPIs:

- **Number of application decisions issued**: To measure performance, regulatory bodies should be able to demonstrate the number of decisions issues in a given timeframe (e.g. quarterly, annually) for each licence and how this compares to the targeted number of applications they intended to issue in that timeframe. This could be done on both an overall basis and a sectoral / critical infrastructure project basis.
- **End-to-end timeline for an application decision to be made:** Though certain regulatory processes have statutory timelines in place, these timelines often only commence after the RFI period is well underway or concluded, which can be months after the application for the consent or licence is submitted. This results in a lack of clarity around how long the end-to-end process of receiving a consent or licence can

take. Bodies with regulatory functions should be able to demonstrate how long the average end-to-end timeline from application to decision should be, and what percentage/number of applications fall within this average timeline every quarter and annually. This could be done on both an overall basis and a sectoral / critical infrastructure project basis.

- **Time taken at each stage of the application**: It may be beneficial for Bodies with regulatory functions in the infrastructure delivery cycle to be able to assess and demonstrate how long each element of their regulatory process should take, including pre-application meetings, and what percentage/number of applications meet the target time in each quarter / annually. This would assist in identification of bottlenecks and monitoring of specific reforms. Similar to above, this could be done on both an overall basis and a sectoral / critical infrastructure project basis.
- **Average number of Requests for Information (RFIs) per application**: To support certainty and ensure that RFIs are necessary, proportionate and consolidated where possible, there should be a best practice benchmark number of RFIs per application, against which regulatory bodies report the percentage/number of applications achieve the benchmark. However, RFIs are a very important part of the application process, as they ensure a robust regulatory process that mitigates the potential for legal challenge. There will be instances where additional RFIs will be necessary. In these cases, providing explanatory text to contextualise the reason for additional requests could be recorded alongside the RFI KPIs.

Regulatory bodies should set targets on any KPIs they deem necessary or relevant to supporting the overall objective of regulatory simplification for critical infrastructure, ensuring these are also evaluated against the SMART+C framework.

Certain regulatory bodies already report some of these KPIs[5]. Collecting these for each regulatory process (authorisation, permit, license, consent), and on both an overall basis and specifically in relation to critical infrastructure projects, would provide clarity, transparency and insights into the regulatory processes and the impact of regulatory simplification.

[5] An Coimisiún Pleanala publish quarterly planning caseload statistics - https://www.pleanala.ie/en-IE/Statistics/Quarterly-Statistics

4.2. Contextualising Metrics

There are additional metrics that do not necessarily track performance but that provide useful context to KPIs and insights into the environment within which a body is undertaking its regulatory functions. These include, but are not limited to:

- Number of applications on hand for each
    - Broken down by sector / project type (housing, road, energy etc)
- Number of pre-application meetings held
- Number of application decisions that were subject to Judicial Review

Monitoring these for each regulatory process, and on both an overall basis and specifically in relation to critical infrastructure projects, would provide important insight for stakeholders, including applicants, parent Departments and the public. Qualitative or narrative text could also be provided in addition to quantitative metrics as appropriate.

5. Reporting Guidance

5.1 Publication

For best practice and to promote transparency, regulators should publish their KPIs, supporting metrics, and actual performance against the KPIs. Doing so enhances accountability and enables all stakeholders in the regulatory process, including applicants to understand performance, decision-making standards, and areas for improvement. Regular publication of this information also supports trust, facilitates benchmarking over time, and encourages continuous improvement within regulatory bodies.

5.2 Reporting Frequency and Format

KPIs and metrics should be tracked at regular, predictable intervals in a way that minimises the reporting burden for regulatory bodies. For example, KPI targets and actual performance should be collected on both a quarterly and annual basis.

KPIs should be reported in a coherent, easy to read format (e.g. tabular format), that clearly outlines:

- The KPI for a licence/consent;
- The quarterly and annual targets for that KPI;
- The actual outturn for that quarter and year;

- The status of the KPI in relation to the target (e.g. using a traffic light system to highlight whether the body is achieving the KPI targets it has set or not).

Reporting KPIs in a structured, regular and consistent way supports clarity, coherence and simplification for regulatory bodies and other stakeholders involved in the delivery of critical infrastructure.

Appendix A – International Examples

This appendix provides an overview of selected international examples of KPI tracking and reporting approaches.

A.1 United Kingdom

The UK's Regulatory Action Plan[6], published in 2025, sets out expectations on regulators to:

- clearly publish their KPIs – a set of high-level measures to assess their performance
- engage with businesses to check the KPIs are relevant and accurate
- seek feedback on areas for improvement, and work with government to make improvements

As part of this, in October 2025, the UK Government announced the launch of a Regulator Dashboard[7], which displays performance of against KPIs and authorisation processing times across 16 key regulator bodies, including the Environment Agency, Natural England, the Office of Gas and Electricity Markets, and the Office of Rail and Road.

The KPIs and performance of these regulators are published by the Department of Business and Trade on a quarterly in one consolidated document. It outlines the KPI measure, the target performance for the period (annual/quarterly), the actual performance for the period, and a RAG status colour categorisation to highlight where regulators are and are not meeting performance targets and timelines.

A.2 Denmark

Since January 2014, Danish municipalities have had to set and publish targets for their processing time when processing building permits on an annual basis.

In 2015, the Danish Government and the Danish Association of Local Authorities (KL) entered into an agreement setting common service targets for municipal business-related case processing. The agreement set targets for processing times for environmental approvals of companies, environmental approvals of livestock farms, and building permits[8].

[6] https://www.gov.uk/government/publications/a-new-approach-to-ensure-regulators-and-regulation-support-growth

[7] Regulator Dashboard

[8] https://www.sbst.dk/byggeri/byggesagsbehandling/servicemaal

For each category of licence and target, the annual publication presents[9]:

- The number of cases.
- The average processing time.
- The percentage of cases within the service targets.

A.3 EU

In January 2026 the European Commission published a report titled '*Monitoring progress of measures to streamline permit-granting procedures under revised RED and Emergency Regulation and development of Key Performance Indicators*'[10].

One objective of the study was to quantify the impact on acceleration of renewable energy source (RES) project permitting, which involved developing suggested appropriate KPIs related to permitting. The report outlines the approach taken in selecting relevant KPIs, including assessing a longlist of KPIs against the SMART+C framework (Specific, Measurable, Actionable, Relevant, Time-bound + Comparable) outlined in this Guidance, in order to derive a short list of KPIs.

To refine the longlist, KPIs were also categorised on the principles of efficiency, effectiveness, transparency & accessibility, and innovation & adaptability, ensuring that the KPIs are aligned with regulatory requirements.

For the selected KPIs, the analysis sets out a detailed description of what the KPI measures, how progress should be measured, and how it could be disaggregated along relevant dimensions (e.g. project type, size, permitting stage, permitting authority level) to strengthen actionability and interpretability of the KPI.

[9] https://www.kl.dk/media/t53nkbsv/sagsbehandlingstider-for-byggesager-og-miljoegodkendelser-af-virksomheder-2025.pdf

[10] Monitoring progress of measures to streamline permit-granting procedures