KEY ESG

RESEARCH REPORT | MARCH 2026

CSRD Engineering & Construction Sector Report

Aggregated sustainability report analysis

43 companies | 13 countries | FY 2023–2025

43	86%	42%	~10
Companies Analysed	With Formal GHG Targets	SBTi Validated	No Transition Plan

All data sourced exclusively from the sustainability report sections of publicly available CSRD filings.

ABOUT THE AUTHOR

KEY ESG

KEY ESG is a leading provider of sustainability and carbon reporting software designed for private equity and infrastructure investors. Our technology enables granular, asset-level data collection and harmonised reporting across frameworks such as CSRD, SFDR and ISSB. By transforming sustainability reporting from a compliance obligation into a strategic advantage, KEY ESG empowers investors and portfolio companies to unlock measurable value, enhance transparency and drive long-term sustainable growth.

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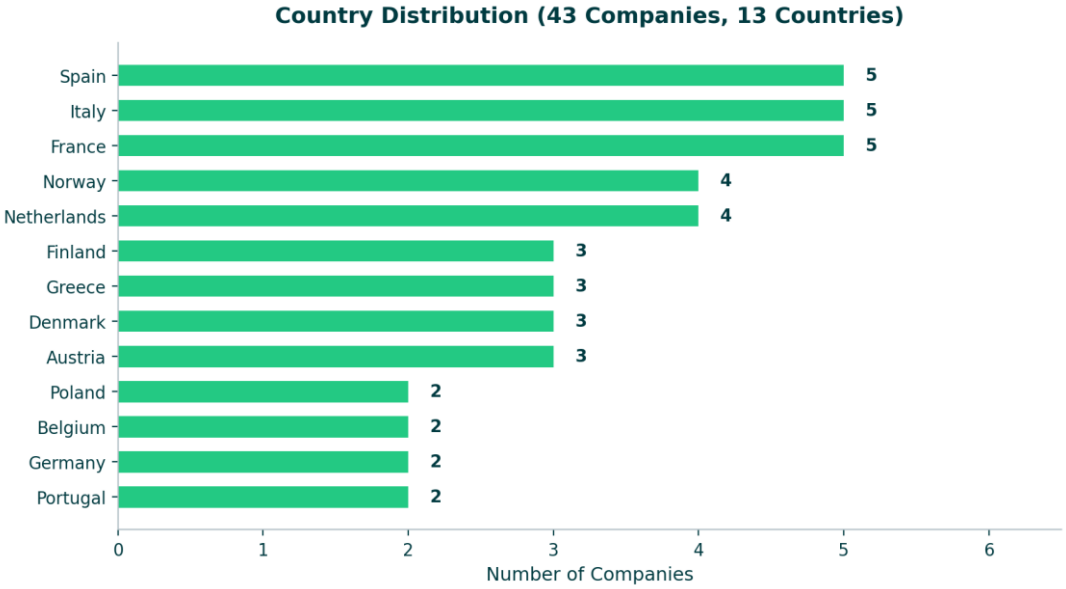
keyesg.com/article/access-the-first-wave-of-csrd-reports

1 Sample Overview

This report synthesises CSRD sustainability disclosures from 43 Engineering & Construction companies across 13 European countries, covering reporting periods from FY 2023 to FY 2025. The sample spans the full breadth of the sub-sector: large diversified conglomerates (VINCI, Bouygues, Eiffage, ACS), pure-play contractors (BAM, STRABAG, PORR, Webuild), specialist infrastructure operators (Abertis, ASTM, Autostrade, Mundys), environmental and maritime services (DEME, Lamor), engineering consultancies (Arcadis, Multiconsult, Sitowise), and technology companies (FLSmidth, GTT, thyssenkrupp nucera, Kapsch TrafficCom).

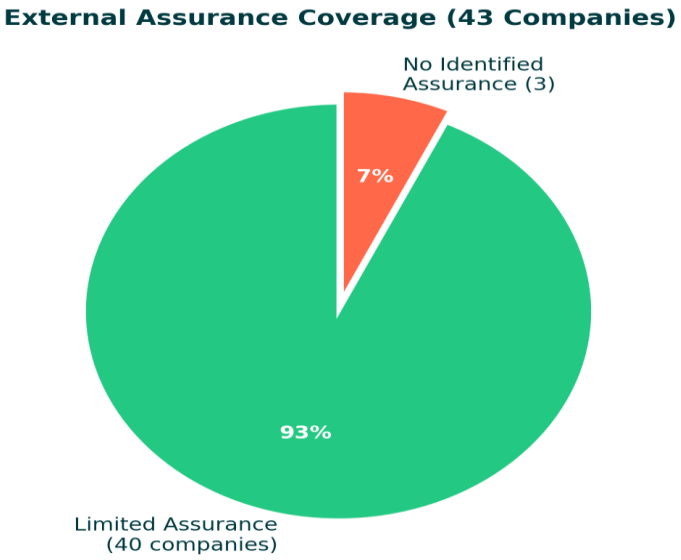
For the overwhelming majority of these companies, FY 2024 represents their first year of mandatory reporting under the Corporate Sustainability Reporting Directive. Several companies provided reports covering two consecutive years, enabling year-on-year comparison and valuable insight into how early reporters are maturing their disclosures.

The sample is weighted toward Western and Southern Europe, with Spain (5 companies), France (5), Italy (5), Netherlands (4), and Norway (4) forming the largest national clusters. Nordic countries collectively account for 10 companies. Central and Eastern European representation includes Poland (2) and Greece (3).



External Assurance

Of the 43 companies, 40 have obtained external limited assurance on their sustainability statements from established audit firms. No company in the sample has achieved reasonable assurance, consistent with the CSRD transitional timeline. Three companies lack identifiable sustainability assurance: Grupo Empresarial San Jose, Per Aarsleff (transitional report only), and Erbud (assurance status unclear). Assurance providers are dominated by Big Four firms: PwC (11 engagements), EY (10), KPMG (7), and Deloitte (5), with the remainder provided by mid-tier firms including Grant Thornton, Mazars, and BDO.



2 Common and Outlier DMA Topics

All 43 companies have conducted double materiality assessments in accordance with ESRS requirements. The number of material ESRS topics identified ranges from 3 (DEME, SPIE) to 14 (Eiffage), reflecting both genuine differences in business models and significant subjectivity in the DMA process.

Universal Material Topics

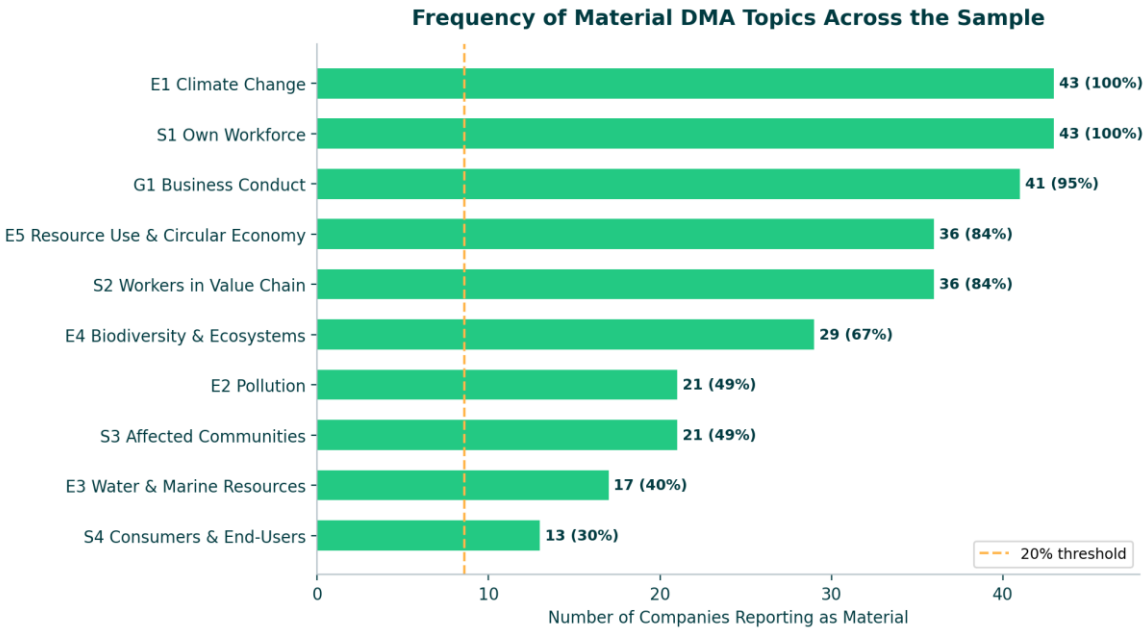
E1 Climate Change and S1 Own Workforce are material for every company without exception. G1 Business Conduct is material for 41 of 43 companies (95%). These three topics form the uncontested materiality core of the Engineering & Construction sector.

Frequently Material Topics

E5 Resource Use and Circular Economy is material for 36 companies (84%), reflecting construction's significant waste generation and material consumption. S2 Workers in the Value Chain is material for 36 companies (84%), consistent with the sector's heavy reliance on subcontracted labour. E4 Biodiversity and Ecosystems is material for 29 companies (67%), driven by construction's direct disruption of land, habitats, and water systems.

Contested and Outlier Topics

E3 Water and Marine Resources is the most frequently excluded ESRS environmental topic, material for just 17 companies (40%). Only companies with significant water dependencies — hydropower, marine construction, and road construction with asphalt operations — consistently identify it as material. S4 Consumers and End-Users (31%) is the most variably reported social topic, frequently excluded by companies without direct consumer relationships.



Entity-Specific Material Topics

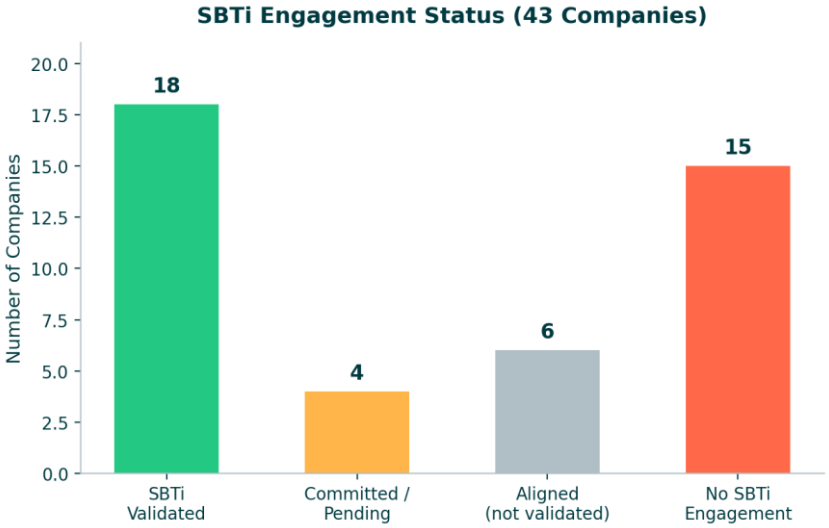
Approximately 15 companies (35%) identified at least one entity-specific material topic beyond the standard ESRS framework. The most common themes include cybersecurity and data protection (Abertis, SPIE, Ferrovial), innovation and digitalisation (ACS, ASTM, Autostrade, Ferrovial), road safety (Abertis), energy transition as a distinct positive impact (DEME), responsible products (METLEN), and access to adequate housing for relocated workers (Grupo San Jose). These entity-specific topics reveal strategic priorities and sector risks that the standard framework does not capture, and their emergence suggests that future sector-specific ESRS guidance should incorporate construction-specific materiality themes.

3 GHG Target Summary

Of the 43 companies, 37 (86%) have set quantified GHG reduction targets. Six companies have not yet set formal targets: GEK Terna, Grupo San Jose, Lamor, Teixeira Duarte, while DEME has intensity targets only and NRC Group and Kapsch TrafficCom describe ambitions not yet formalised as targets. The absence of targets is concentrated among first-year reporters and smaller companies.

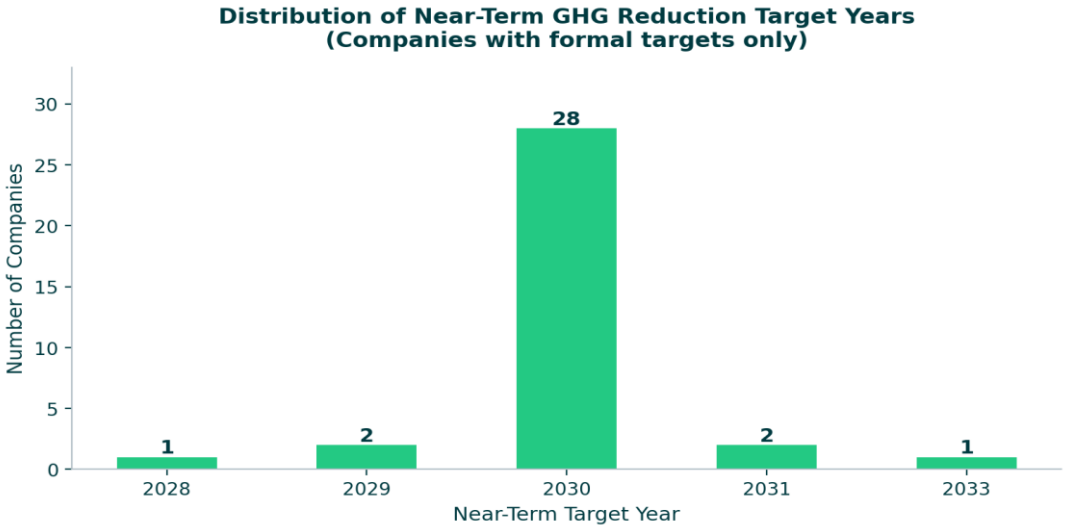
SBTi Engagement

SBTi engagement has become a meaningful credibility differentiator. Eighteen companies (42%) hold fully validated SBTi targets, including BAM, Arcadis, Abertis, ASTM, Autostrade, Bouygues (subsidiary level), Eiffage, Ferrovial, FLSmidth (near-term), Mota-Engil, Multiconsult, Mundys, OHLA, Sacyr, Sitowise, Veidekke, VINCI, and Webuild. A further four are committed or have validation pending (STRABAG, PORR, Ellaktor, SPIE). Six companies describe their targets as aligned with SBTi methodology but have not submitted for formal validation. Fifteen companies (35%) have no SBTi engagement.



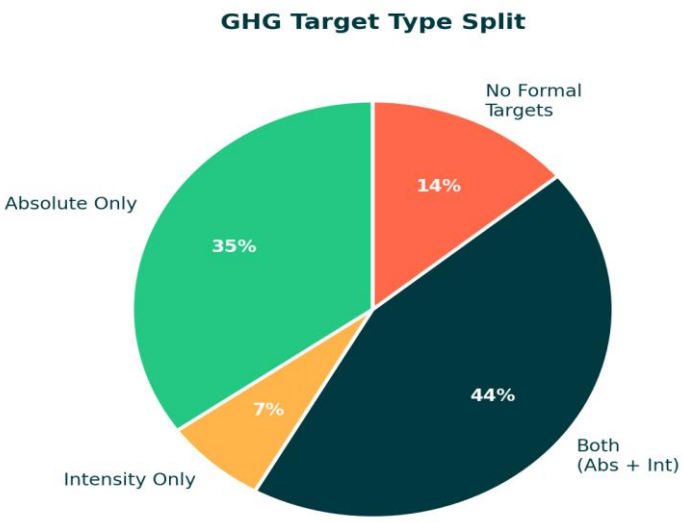
Target Years and Net-Zero Commitments

Near-term target years cluster overwhelmingly around 2030, with 28 companies targeting this year for interim reductions. Net-zero commitments range from 2035 (Arcadis — the most ambitious) through 2040 (STRABAG), 2045 (BAM, Abertis, HOCHTIEF, Veidekke), to 2050 (the majority with long-term commitments). Several companies have no net-zero commitment, including GEK Terna, Lamor, Teixeira Duarte, and Sitowise.



Target Architecture

Most companies set absolute targets for Scope 1+2 and either absolute or intensity-based targets for Scope 3. Intensity-based Scope 3 targets are common where companies argue that absolute reductions are unrealistic given business growth — a structural tension particularly visible among rapidly growing companies. BAM and Arcadis stand out for having absolute targets across all scopes with explicit no-offset policies.



4 GHG Intensity Benchmarking

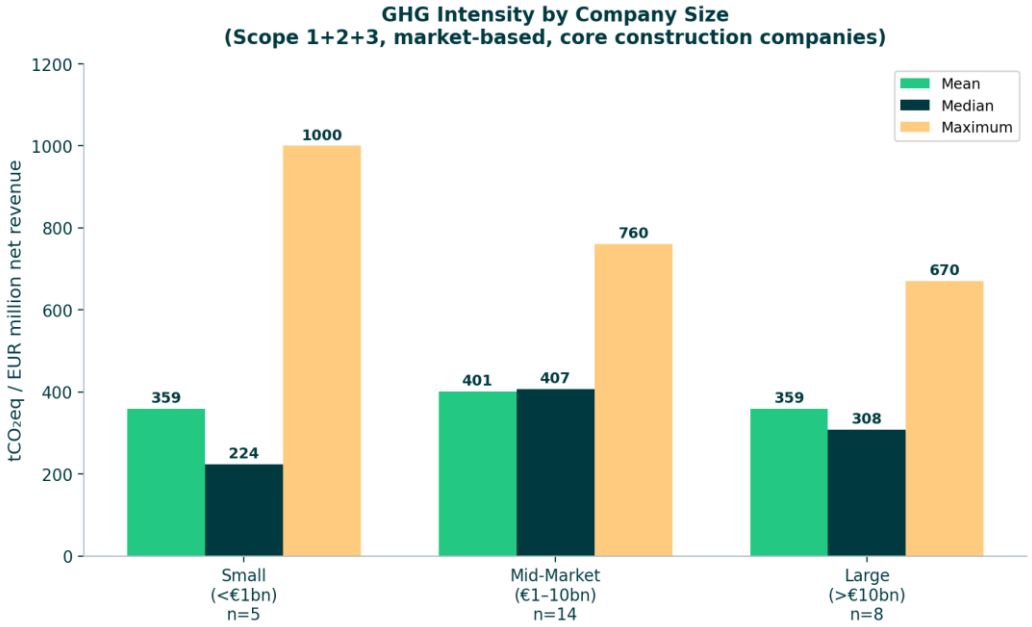
GHG intensity (Scope 1+2+3, tCO_2eq per EUR million net revenue, market-based) was analysed for all companies where EUR-denominated combined intensity data was available. Of the 43 companies, 33 disclosed this metric in EUR. The remaining 12 report in other currencies (NOK, DKK, PLN) or do not disclose combined Scope 1+2+3 intensity per revenue.

To provide meaningful benchmarks, companies were grouped into three revenue tiers: Small (revenue below €1 billion), Mid-Market (€1–10 billion), and Large (above €10 billion). Companies with fundamentally different business models — where Scope 3 Category 11 (use of sold products) or heavy industrial processes dominate the emissions profile rather than construction materials — were excluded from the core construction averages to avoid distortion.

Intensity by Company Size

Revenue Group	Companies	Mean	Median	Range	Excl. Outliers
Small (<€1bn)	5	359	224	27 – 1,000	GTT, Lamor
Mid-Market (€1–10bn)	14	401	407	77 – 760	GEK Terna, METLEN, Technip E., OHLA
Large (>€10bn)	8	359	308	203 – 670	None excluded

Table: GHG Intensity by Revenue Group — tCO_2eq per EUR million net revenue (Scope 1+2+3, market-based). Core Engineering & Construction companies only.



The data reveals several patterns. Mean intensity is remarkably similar across the three size tiers (359–401 tCO_2eq per EUR million), suggesting that company size alone is not a reliable predictor of carbon intensity in this sector. The range, however, varies significantly: small companies span from 27 (Sitowise, a pure consultancy) to 1,000 (Ellaktor, reflecting its heavy construction and former waste management operations), while large companies range from 203 (HOCHTIEF) to 670 (VINCI).

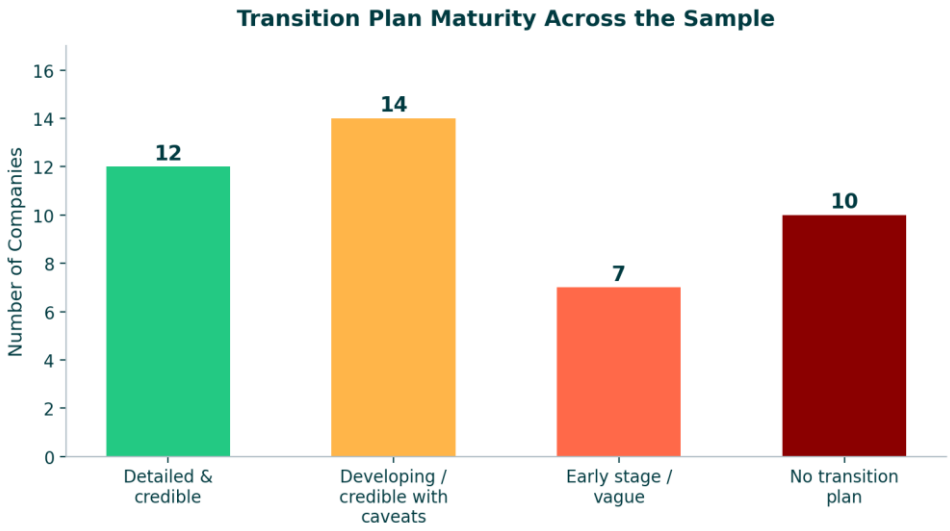
Among large companies, HOCHTIEF (203), ACS (213), and Ferrovial (229) demonstrate the lowest intensities — reflecting advanced decarbonisation programmes and, in some cases, business-model evolution toward higher-value, lower-carbon services. STRABAG (570) and VINCI (670) sit at the upper end, partly reflecting the inclusion of road construction and concessions segments with higher material intensity.

Among mid-market companies, consultancies and concession operators (Arcadis at 77, Abertis at 97, BAM at 219) anchor the lower end, while heavy infrastructure contractors (Mota-Engil at 760, PORR at 724, MAIRE at 670) occupy the upper range.

These figures should be interpreted with caution. Cross-company comparability is limited by differing Scope 3 methodologies (spend-based vs. activity-based), revenue definitions, and reporting boundary choices. First-year CSRD reporters typically lack prior-year comparatives, preventing trend analysis. As multi-year data accumulates and Scope 3 methodologies mature, benchmarking reliability will improve significantly.

5 Decarbonisation Trajectory

The overall assessment of transition plan credibility across the 43-company sample reveals a wide spectrum of maturity, from sector-leading exemplars with SBTi-validated targets and quantified decarbonisation levers to companies that have not yet set any targets or developed a transition plan.



Tier 1: Highly Credible Transition Plans (~12 companies)

The strongest transition plans combine SBTi-validated targets, Board-approved strategies, quantified decarbonisation levers, clear interim milestones, and transparent disclosure of residual challenges. Companies in this tier include BAM (no-offset policy, 76% Scope 1+2 reduction achieved), Arcadis (net-zero 2035 with consistent delivery), Eiffage (substantive embodied carbon discussion for concrete, bitumen, and steel), Ferrovial (40% Scope 1+2 reduction achieved), HOCHTIEF (most granular target architecture), VINCI (business-line target differentiation), Veidekke (SBTi with FLAG pathway), Webuild (CDP A-list three consecutive years), Multiconsult (2025 targets achieved across all scopes), and OHLA (ambitious Scope 3 intensity target).

Tier 2: Credible with Caveats (~15 companies)

Substantive targets and developing transition plans, but with identifiable gaps. This tier includes Abertis, ASTM, Autostrade, Bouygues, STRABAG, PORR, Sacyr, SPIE, MAIRE, METLEN, Sitowise, Per Aarsleff, Ellaktor, Consti, and CFE. Common caveats include data quality concerns, Scope 3 reliance on spend-based estimation, and transition plans still in development.

Tier 3: Early Stage or No Transition Plan (~10 companies)

Companies at the weakest end share common characteristics: no formal transition plan, incomplete or no GHG targets, and no SBTi engagement. Notable cases include GEK Terna (no targets despite substantial Scope 1 emissions from petcoke), Lamor (no targets despite 357,000 tCO_2e total), Teixeira Duarte (no targets, first carbon footprint in 2024), Grupo San Jose (no targets, no sustainability assurance), AF Gruppen (no ESRS-compliant plan, though commendably transparent about gaps), Erbud (no plan, committed to developing by 2026), and NRC Group (ambition only, no validated targets).

> *"In achieving targets for 2026 and 2030, BAM does not include the offsetting of any carbon emissions nor does BAM allow any offsetting."*
>
> *— BAM, Sustainability Report 2025, p.104*

> *"AF Gruppen has not yet developed a transition plan that meets the ESRS requirements, but will prioritise efforts to quantify emission reduction measures in the future."*
>
> *— AF Gruppen, Sustainability Report 2024, p.195*

6 Sector-Specific Risks and Opportunities

Most Frequently Identified Risks

Climate physical risks to project sites. Identified by virtually every company. Extreme weather events directly disrupt construction schedules, worker safety, and project economics. Abertis assesses risk at specific geospatial coordinates; HOCHTIEF uses IPCC RCP scenarios across global sites.

Supply chain emissions opacity and material cost volatility. Universal across construction-focused companies. Category 1 (purchased goods and services) dominates Scope 3 for nearly all contractors, yet spend-based estimation remains the norm. Rising carbon costs for cement, steel, and aggregates represent both a financial and transition risk.

Regulatory complexity. EU Taxonomy alignment, evolving building codes, carbon pricing mechanisms (including EU ETS 2), and CSRD disclosure requirements create compliance burden and cost uncertainty.

Skills shortages. Flagged across all geographies. Competition for qualified construction workers is intensified by demographic trends, sustainability expertise requirements, and sectoral reputation challenges.

Corruption and procurement integrity. A well-documented sector risk, yet anti-corruption enforcement disclosure remains thin across the sample. VINCI provides the most detailed disclosure, including forced labour due diligence for migrant workers.

Most Frequently Identified Opportunities

Green and sustainable construction. The dominant opportunity. Renovation, retrofit, energy efficiency, and climate adaptation infrastructure are universally identified as growth drivers.

Circular construction and material innovation. STRABAG tracks six core materials with quantity-based emission factors. Per Aarsleff has introduced material-specific Scope 3 KPIs. Consti achieved its 70% waste recycling target.

Digital construction and engineering services. BIM adoption, prefabrication, modular construction, and data-driven design are identified as both efficiency and emissions-reduction opportunities.

EU Taxonomy-aligned revenue growth. Companies are increasingly framing taxonomy alignment as a competitive advantage. SPIE derives 48.7% of revenue from taxonomy-aligned activities.

7 Best Practices

The following disclosures and approaches stand out across the full sample as sector benchmarks:

BAM — No-offset policy and subcontractor safety: Explicitly prohibits carbon offsetting. Subcontractor safety metric (IF Total) includes non-employees — best practice for a sector reliant on subcontracted labour.

Arcadis — Net-zero 2035: The most ambitious timeline in the sample with SBTi validation and consistent delivery.

Eiffage — Embodied carbon in key materials: Most substantive discussion of decarbonisation pathways for concrete, bitumen, and steel.

STRABAG — Six core materials tracking: Quantity-based (not spend-based) emission factors for asphalt, bitumen, stone/gravel, steel, concrete, and cement.

Veidekke — SBTi with FLAG pathway: The only company with approved SBTi targets including forestry, land and agriculture emissions.

VINCI — Forced labour due diligence: Extensive migrant worker protections, ILO partnership, and business-line target differentiation.

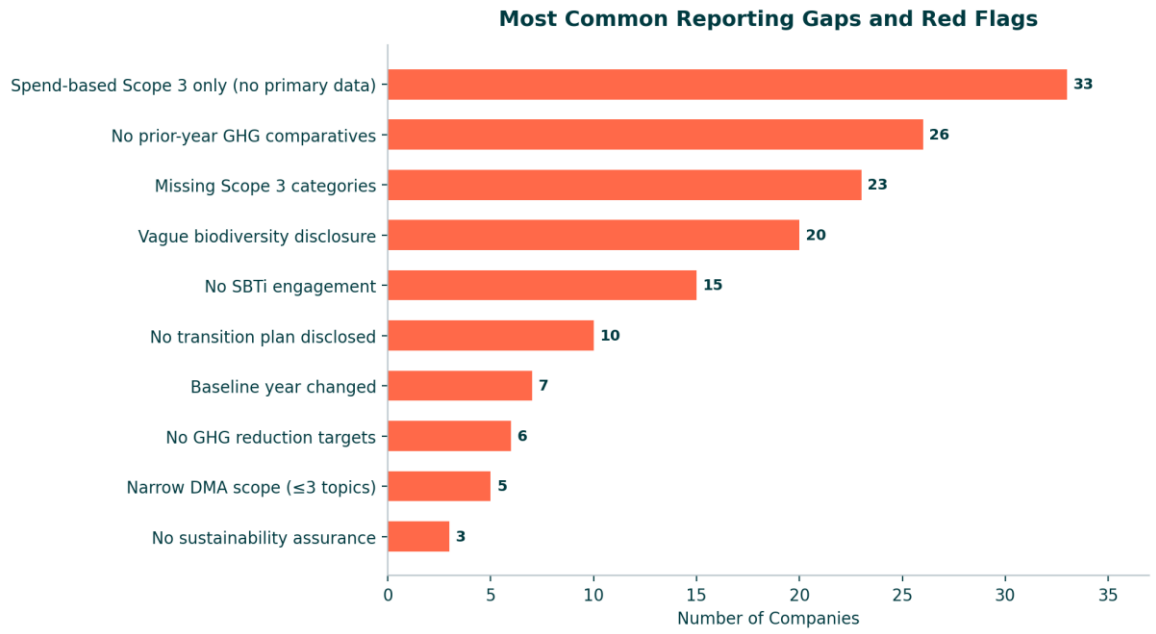
Per Aarsleff — Material-specific Scope 3 KPIs: Tracking concrete, cement, reinforcing steel, and asphalt individually.

Sacyr — ISAE 3410 GHG verification: Separate verification of GHG inventory to the specific greenhouse gas assurance standard.

Consti — Transparent target tracking: Explicitly reports achieved and not-achieved against each goal, including admitting missed targets.

Webuild — Infrastructure lifecycle argument: Well-articulated case that temporary construction emissions yield permanent infrastructure benefits over 80–100 year asset lives.

8 Red Flags and Reporting Gaps



Spend-based Scope 3 estimation is near-universal. Approximately 35 companies rely on expenditure-based estimation for Category 1. Erbud reports 0% primary data. Methodological changes can produce dramatic year-on-year swings that do not reflect actual reductions — as demonstrated by Consti's 43% apparent intensity improvement driven by emission factor reclassification.

No prior-year GHG comparatives for approximately 28 companies. As 2024 is the first CSRD year for most, trend analysis is not yet possible for the majority of the sample.

Missing Scope 3 categories. Category 11 (use of sold products) is excluded by MAIRE, not yet calculated by Mota-Engil, and only partially covered by others. Several companies mark multiple categories as not applicable without documented screening.

No transition plan for approximately 10 companies. GEK Terna, Lamor, Teixeira Duarte, Erbud, NRC Group, and AF Gruppen are among those without formal climate transition plans.

Target downgrades and baseline changes. MT Højgaard revised its target from 42% to 25% between consecutive reports. Per Aarsleff changed its baseline while reducing its target. Budimex acknowledges its 2020 baseline is distorted by COVID-19. These changes complicate trend analysis.

Emissions increases despite stated targets. Mota-Engil's absolute emissions are 52% above baseline. OHLA's Scope 3 tripled in a single year due to river defence projects in Peru. Autostrade's intensity rose 28%. These cases illustrate the fundamental tension between business growth and absolute emission reduction in a project-based sector.

9 Notable Quotes

The following quotes are selected for their potential value as evidence or illustrative examples. All are attributed with company name and page reference.

> *"In 2021, ASTM became the first European motorway operator to set science-based targets validated by SBTi."*
> *— ASTM, Sustainability Report 2024, p.104*

> *"The share of Scope 3 emissions calculated from primary data is 0%."*
> *— Erbud, Sustainability Report 2024, p.243*

> *"DEME has not yet established absolute outcome-oriented targets for GHG emissions reduction."*
> *— DEME, Sustainability Report 2024, p.294*

> *"Maintaining efforts on a purely voluntary basis will remain a significant challenge without regulation imposing or rewarding the use of low carbon fuels."*
> *— DEME, Sustainability Report 2024, p.295*

> *"Consti's climate targets are not science-based."*
> *— Consti, Sustainability Report 2025, p.58*

> *"The Teixeira Duarte Group has not yet set targets for reducing GHG emissions, due to the current maturity level of the data."*
> *— Teixeira Duarte, Report and Accounts 2024, p.63*

> *"The infrastructures for which the Group generates emissions during their construction in turn generate benefits that are very significant in terms of avoided or reduced emissions... the environmental benefits are nearly permanent given that many works have a useful life of between 80 to 100 years."*
> *— Webuild, Sustainability Report 2024, p.189–190*

> *"VINCI chose to set ambitious but realistic objectives."*
> *— VINCI, Universal Registration Document 2025, p.210–211*

10 Sector-Level Conclusions

The first mandatory CSRD reporting cycle for the European Engineering & Construction sector has produced a rich but uneven evidence base. The following conclusions emerge from the analysis of 43 companies across 13 countries.

CSRD/ESRS Adoption Maturity

ESRS compliance is widespread but uneven in depth. All 43 companies have conducted double materiality assessments and report against ESRS. However, maturity varies dramatically — from companies like Eiffage (14 material issues, SBTi validated) and Bouygues (110 stakeholder

interviews, subsidiary-level SBTi) to first-year reporters like Teixeira Duarte and Erbud that openly acknowledge significant gaps. Convergence toward consistent quality will take multiple reporting cycles.

External Assurance

Limited assurance is near-universal (93%) but no company has achieved reasonable assurance. There is no observable correlation between assurance level and disclosure quality in this sample — limited assurance appears to function as a compliance floor rather than a quality differentiator. The transition to reasonable assurance will test whether providers can meaningfully assess Scope 3 estimates built largely on secondary data.

Scope 3: The Critical Frontier

Scope 3 dominance is the defining feature of the sector's carbon footprint. For virtually every company, Scope 3 represents 85–99% of total emissions, driven overwhelmingly by Category 1 (purchased goods and services — cement, steel, aggregates, aluminium). Measurement remains immature: spend-based estimation is near-universal, primary supplier data is rare, and methodological changes produce dramatic year-on-year swings that do not reflect actual reductions. Until the sector transitions to activity-based primary data from material suppliers, Scope 3 figures should be treated as indicative rather than precise.

Decarbonisation Credibility

The sector is splitting. Approximately 12 companies have highly credible, SBTi-validated transition plans with quantified levers and demonstrated progress. At the other end, approximately 10 have no plan at all. The critical differentiator is specificity: companies that articulate exactly which materials they will substitute, which machinery they will electrify, and which supply chain engagement programmes they will deploy are fundamentally more credible than those offering vague commitments.

The tension between business growth and absolute emission reduction is structurally embedded: Mota-Engil's emissions are 52% above baseline due to growth; MT Højgaard downgraded its target from 42% to 25%. This will be a defining challenge for the sector's decarbonisation narrative.

Leading vs. Lagging Reporters

Leading reporters share: (1) SBTi-validated targets covering all material scopes; (2) Board-level governance of climate risk; (3) Quantified decarbonisation levers linked to specific materials, technologies, and timelines; (4) Transparent disclosure of gaps alongside progress; (5) Supply chain engagement with measurable KPIs. Lagging reporters share inverse characteristics.

Implications

For investors: The first CSRD cycle provides a richer evidence base than previously available, but the data is not yet suitable for precise benchmarking. SBTi validation and transition plan maturity are more reliable indicators of climate risk management quality than raw emission figures. The approximately 10 companies with no transition plan represent the highest disclosure risk.

For regulators: The variation in DMA scope (3 to 14 topics), near-universal reliance on spend-based Scope 3, and absence of standardised intensity metrics suggest that sector-specific guidance would significantly improve comparability. The CSRD framework has succeeded in generating disclosure — the next challenge is ensuring that disclosure is meaningful.

For the sector: The compounding advantage of early action is visible in this data. Companies that invested early in science-based targets, Board-level climate governance, and granular Scope 3 measurement are now demonstrating that their disclosures function as genuine management tools. The gap between this leading tier and the rest will widen with each reporting cycle.

Reference Index: Companies Analysed

All 43 CSRD sustainability reports analysed in this research are publicly available. The full library of CSRD disclosures, including all reports referenced below, can be accessed via the KEY ESG CSRD Reports Library at keyesg.com/article/access-the-first-wave-of-csrd-reports. The library currently covers 944 reports across 38 countries and 13 SASB industry sectors.

944 reports | 38 countries | 13 SASB sectors | 3 reporting years

Company	Country	Sub-sector	Period
Abertis Infraestructuras	Spain	Toll road concessions	FY 2024–2025
ACS Actividades de Construcción y Servicios	Spain	Integrated construction & services	FY 2024
AF Gruppen ASA	Norway	Civil engineering & contracting	FY 2024
Arcadis N.V.	Netherlands	Environmental consulting	FY 2024–2025
ASTM S.p.A.	Italy	Motorway concessions & construction	FY 2024
Autostrade per l'Italia	Italy	Motorway concessions	FY 2024
Bouygues SA	France	Diversified construction conglomerate	FY 2024
Budimex SA	Poland	General contracting	FY 2024
CFE SA	Belgium	Construction & contracting	FY 2024
Consti Yhtiöt Oyj	Finland	Renovation & technical services	FY 2024–2025
DEME Group NV	Belgium	Dredging & marine engineering	FY 2024
Eiffage SA	France	Diversified construction & concessions	FY 2024
Ellaktor SA	Greece	Construction & infrastructure	FY 2024
Erbud Group SA	Poland	Construction & modular building	FY 2024
Ferrovial SE	Netherlands/Spain	Infrastructure & toll roads	FY 2024–2025
FLSmidth & Co. A/S	Denmark	Mining & cement technology	FY 2024–2025
Gaztransport & Technigaz (GTT)	France	LNG membrane technology	FY 2024
GEK Terna Group	Greece	Construction & energy	FY 2024
Grupo Empresarial San Jose	Spain	General construction	FY 2024–2025
HOCHTIEF AG	Germany	International construction	FY 2024–2025
Kapsch TrafficCom	Austria	Intelligent transport systems	FY 2024/25
Lamor Corporation	Finland	Environmental services	FY 2024
MAIRE	Italy	Industrial engineering & technology	FY 2024
METLEN Energy & Metals	Greece	Energy & metals conglomerate	FY 2024
Mota-Engil SGPS	Portugal	Diversified construction	FY 2024
MT Højgaard Holding	Denmark	Construction & civil engineering	FY 2024–2025

Multiconsult ASA	Norway	Engineering consultancy	FY 2024–2025
Mundys S.p.A.	Italy	Infrastructure concessions holding	FY 2024
NRC Group ASA	Norway	Rail infrastructure	FY 2024
OHLA (Obrascon Huarte Lain)	Spain	International construction	FY 2024
Per Aarsleff Holding A/S	Denmark	Construction & pipe rehabilitation	FY 2023/24–2024/25
PORR Group	Austria	Construction	FY 2024
Royal BAM Group N.V.	Netherlands	Construction & property	FY 2024–2025
Sacyr	Spain	Construction & concessions	FY 2024
Sitowise Group Oyj	Finland	Engineering & design consultancy	FY 2024–2025
SPIE SA	France	Multi-technical services	FY 2024
STRABAG SE	Austria	Construction & building materials	FY 2024
Technip Energies N.V.	Netherlands	Energy technology & engineering	FY 2024–2025
Teixeira Duarte S.A.	Portugal	Diversified construction	FY 2024
thyssenkrupp nucera AG	Germany	Electrolyser technology	FY 2024/25
Veidekke ASA	Norway	Construction & property	FY 2024
VINCI SA	France	Diversified concessions & construction	FY 2024–2025
Webuild S.p.A.	Italy	Major project construction	FY 2024