

CCPC CLIMATE ACTION ROADMAP

Date: 17/10/2025

Version 3



Coimisiún um
Iomaíocht agus
Cosaint Tomhaltóirí

Competition and
Consumer Protection
Commission

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Revision History

Version	Date	Revision Author	Summary of Changes
1	19 October 2023	Sandra Rafferty	New CCPC Annual Roadmap for 2024 to reflect Public Sector Climate Action Mandate 2023
2	29 August 2024	Sandra Rafferty	Updated Roadmap in line with the updated public sector climate action mandate, which was published in Climate Action Plan 2024
3	17 October 2025	Sandra Rafferty	Updated Roadmap in line with the updated public sector climate action mandate 2025.

Approval

Name	Position	Date
Commission	N/A	19 October 2023
Commission	N/A	29 August 2024
Commission	N/A	17 October 2025

1. Introduction

1.1 Organisational context

The Public Sector Climate Action Mandates are set out in the Climate Action Plans and require public sector bodies to show leadership in climate action by taking and reporting on the actions of each Mandate. The updated mandate was published on 15 April 2025.

This requires public sector bodies to contribute, as far as practicable, to the reduction in Ireland's greenhouse gas (GHG) emissions by 51% by 2030, on the path to net-Zero emissions no later than 2050.

This Roadmap addresses the following specific legal requirements relating to energy and climate action:

- Climate Action and Low Carbon Development (Amendment) Act 2022, which requires all public bodies to perform their functions in a manner consistent with Ireland's climate ambition
- SI646/2016, which requires that public bodies procure only energy using products and vehicles that are on the Triple E register
- SI426/2014, which requires the public sector to demonstrate exemplary energy management and requires public bodies to undertake energy audits every four years, [if they meet the relevant criteria](#).

The requirement of SI393/2021 which relates to building automation and control and parking/bike spaces cannot however be met by the CCPC and the reasons are detailed below:

- The HVAC system is managed by the landlord, so the CCPC is limited to requesting that the landlord update the system to building automation and control. As such, the CCPC cannot guarantee the installation of Building Automation and Control System by 2025.
- It will not be possible for the CCPC to install electric vehicle charging points in the carpark. The CCPC occupies a leased building on the grounds of a private residential property, and the carpark is managed by the resident's management company with spaces leased by the CCPC's landlord.

This Roadmap was approved by the Commission on [tbc]. It will be reviewed annually and updated as necessary.

1.2 Progress to Date

The CCPC has achieved a Smarter Travel Mark at bronze level. In this regard, the CCPC participated in the following NTA initiatives in 2024 and 2025:

- Walktober in October 2024
- Marchathon in March 2025
- Ready, Set Cycle in May 2025

In terms of energy-saving, we are limited, but we continue to turn off equipment as far as practicable for public holiday weekends.

We removed cups from water machines in the general office areas and all meeting rooms except for the Boardroom.

The CCPC measured its paper consumption over a period and is satisfied that paper consumption is at a very low level.

The CCPC contacted its landlord on numerous occasions regarding the water monitoring, but the landlord has not agreed to provision of a system for monitoring water usage.

In terms of energy consumption, the CCPC recently reduced the number of printers per floor from two to one, halving the number of printers.

2. Our targets

2.1 Energy efficiency

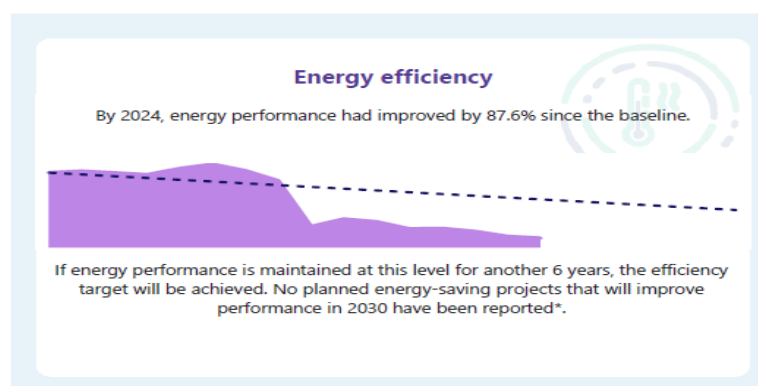
The MandR system shows comparison data for 2023 with other public sector bodies and the CCPC:

- Had the 2nd best energy performance since the baseline out of 79 public bodies in our sector
- Had the 11th best performance in fossil CO₂ greenhouse gas emissions out of 71 public bodies
- Had the 13th best performance in total CO₂ greenhouse gas emissions out of 79 public bodies in our sector

The CCPC activity metric of Full Time Equivalent (FTEs) has increased each year since the baseline year and it is expected that this will continue due to the introduction of legislation which has resulted in new functions for the CCPC. In the baseline year of 2019 the FTE was 105 and in 2024 it was 202.3¹.

¹ This FTE figure represents the staff number taking into account recruitment and leavers throughout the year, which differs from the Financial Statement figure which references the staff number at year end

The graph below, taken from the MandR system, shows that energy performance in the CCPC for 2024 improved by 87.6% since the baseline². This is also a further improvement since 2023 when we had improved by 85.3%. The data suggests that if energy performance is maintained at this level for another 6 years, the efficiency target for 2030 will be achieved.



2.2 Emissions Reductions

The Climate Action Mandate has set the baseline for the calculation of further emissions reductions³ as the average of the 2016-2018 emissions, which is 86,713.2kgCO₂ for the CCPC.

The information below is taken from the MandR system and reports on the CCPC's expected achievement of the climate action targets:



A Public Body's absolute target depends on its baseline emissions and its baseline fuel split. All public bodies' targets are based on reducing thermal and transport GHGs by 51% and reducing electricity GHGs in line with supply-side decarbonisation. Based on the above, the CCPC's Total CO₂ target will be achieved through the decarbonisation of the grid.

² This baseline differs from the carbon emissions and is the date from which public bodies were required to report on energy consumption and reduction initiatives via the SEAI Monitoring and Reporting (M&R) system.

³ This baseline is set out in the Climate Action Plan 2022 and differs from the energy efficiency baseline. The baseline for the methodology is the period 2016-18, with a scaling factor applied to ensure the individual targets equal the total ambition.

Our past performance on energy management activities is reflected in our excellent MandR results and scorecard. We will be vigilant in safeguarding these achievements and where possible improve further as we now look towards the 2050 targets.

We will report annually on implementation of the Climate Action Mandate requirements using SEAI's Public sector M&R System (when required) adopting a "comply or explain" approach.

2.3 Section 15(1) of the Climate Action and Low Carbon Act 2021

The CCPC does not believe that any of its functions have a material role in implementing: (i) the Climate Action Plan; and/or (ii) the Public Sector Climate Action Strategy; and/or (iii) the furtherance of the national Climate Objective.

However, the CCPC's Energy Coordinator will participate in any training events organised by the SEAI on this matter and, if appropriate, will prepare a report of the measures that will be taken to ensure their functions are consistent with section 15(1) of the Act in addition to Action CP/23/12 as set out in Climate Action Plan 2023 within two months of completion of the training.

3. Our People - Leadership and Governance for climate action

The Commission is committed to supporting the Climate Action Mandate as far as practicable and will make every effort to contribute to the overall reduction in Ireland's greenhouse gas (GHG) emissions by 51% by 2030, on the path to net-Zero emissions no later than 2050.

The CCPC accepts that the achievement of climate action measures will succeed best through staff engagement. It is for this reason that the Green Team consists of volunteers from across the organisation and new members are sought on an annual basis, at minimum. The current Green Team consists of five staff members (two facilities personnel, the Executive Assistant to the Commission, Consumer Contacts Manager and Consumer Enforcement Investigator).

Below is a presentation of the governance structure for climate and sustainability within the CCPC.

Chairperson Responsibility: Overall responsibility for the resourcing and oversight of the Climate Action Roadmap initiatives
Commission Responsibility: Approval of the Climate Action Roadmaps
The Climate and Sustainability Champion is the Director of Corporate Services Responsibility: Implementation and reporting on the Mandate.

The Energy Coordinator is the Corporate Services Manager with responsibility for facilities management

Responsibility: Devising, implementing and reviewing the energy & environmental management system

Green Team

Responsibility: Implement practices to help reduce the CCPC's energy/environmental footprint and to promote energy efficiency practices across the CCPC.

The Team shall consist of a Chairperson and no fewer than three other members.

The Chair of the Team is the Corporate Services Manager with responsibility for facilities management.

The Team aims to represent all Divisions of the CCPC in its membership.

The Team is governed by a Charter.

4. Engaging our people

4.1 Staff Training Plans

Each member of the Green Team will consider their individual training needs in respect of this work to allow them to provide the best support possible.

Reference to green public procurement will be included in the procurement module of the compliance training programme.

General staff interested in climate action and sustainability training can apply for such training as part of the learning and development processes. The Green Team will remind staff of this in December and May each year.

4.2 Plans for Climate Action and sustainability workshops

The Green Team will work with the CCPC's OPW@Work consultant to identify and deliver appropriate staff engagement workshops for the upcoming year. We also participate in NTA sustainability initiatives such as the bike to work and walkathon initiatives. The Green Team also communicates with staff on environmental matters a monthly basis, where practicable, via the CCPC's internal newsletter.

4.3 Senior Leadership Training

The CCPC delivered comprehensive senior leadership training to its management team in 2024 and 2025. While, the CCPC has hired additional senior staff since the course delivery, we feel this level of training gives the organisation appropriate climate leadership knowledge at senior management level. In light of this, and the fact that it does not have access to OneLearning courses to allow individuals to join in with other organisations, an appropriate group course will be considered in 2026 to ensure best value for money and up to date knowledge on this matter.

5 Our Way of Working

5.1 Energy and environment management systems

The CCPC follows the SEAI Exemplar Energy Management programme for micro-business, in that:

- A Coordinator has been appointed.
- The CCPC has a formal written energy statement.
- A full assessment of significant energy users and factors has been completed.
- Climate Action Roadmaps deliver target energy and emission savings.
- Energy awareness is promoted to staff.
- There is a formal system for energy measurement and monitoring. In particular, the CCPC receives monthly energy reports from the OPW@Work and seeks to address increases in consumption.
- Energy consumption is also reviewed annually and reported in the SEAI M&R system.

5.2 Green public procurement

The CCPC's procurement policy and associated documentation requires staff to use the EPA guidance and OGP GPP criteria search tool when procuring goods or services in any of the 10 categories, as appropriate. Also, where practicable, the CCPC avails of Office of Government Procurement (OGP) contracts which address green procurement.

CCPC procurement personnel have also undertaken appropriate green public procurement training and are registered with Energy Link to further advance their knowledge.

The CCPC reports on the use of GPP in relation to individual contracts valued over the applicable national procurement thresholds.

The CCPC will adhere to Circular 17/2025 regarding new Green Public Procurement obligations. It will also implement Green Public Procurement in accordance with the Green Public Procurement Implementation Mandate set out in the Buying Greener: Green Public Procurement Strategy and Action Plan 2024-2027 as follows:

- The CCPC will now gather data on green public procurement on an annual basis and will consider the feasibility of measuring the environmental and climate benefits achieved through the application of green criteria in future procurements.
- GPP criteria are incorporated into all procurement processes.
- The CCPC will provide justified reasons for not including GPP criteria in relevant tender processes in the annual report as required by Circular 17/2025.
- New contract arrangements related to food services for conferences will cease using disposable/single use cups, plates and cutlery.

- Where possible and proportionate, polyester fibre products procured will be manufactured using a minimum recycled content of 20%.
- CCPC tenders will include verification of GPP criteria, for example, request the submission of evidence where a specific ecolabel or product certification, or equivalent is referenced.
- The CCPC's Corporate Procurement Plan is a multi-year plan that expires at the end of 2026. Where practicable, the next Plan will incorporate appropriate GPP matters as detailed in the Mandate.
- Procurement eForms are used where possible.

5.3 Construction

This is not applicable to the CCPC.

5.4 Food Waste

The CCPC has compost bins across the office area and the Green Team consistently encourage staff to use the compost bins as far as practicable. However, it has not yet been possible to monitor the impact of the waste initiatives as the waste reports suggested bins were being used incorrectly. The landlord has now arranged for the appropriate coloured bins to be placed in the bin store, and it is hoped that this will increase the amount of recycling and compost waste that is reported.

The CCPC will monitor its food waste generated based on the reports provided by the Landlord's waste collection service provider and the Green Team will consider ways in which the waste generation can be reduced on an annual basis at minimum.

5.5 Single use items

The CCPC has removed biodegradable disposable cups from all water machines except for the Boardroom with a view to reducing their use. Any cups used are biodegradable ensuring best practice waste management. We will also continue:

- the non-use of single use plastics and minimising the use of any other single use items (recyclable or compostable) from events organised, funded or sponsored by the CCPC and in publicly funded advertising
- to provide keep cups and reusable water bottles to staff thereby reducing the use of single use items.

5.6 Paper and paper-based processes

The CCPC processes are predominately digital and there are limited options to digitise further. We also promote a non-printing policy and procure recycled paper, where practicable.

The printing for 2024 was measured and found that the volume of pages printed per employee per day is only 2 pages, an extremely low volume. The measurement will continue

on an annual basis and if this increases significantly options to reduce paper consumption will be examined. The CCPC will also continue with efforts to reduce printing by reporting monthly printing statistics to the Divisions that are the top three printers in the month.

5.7 Water

The CCPC provides suitable drinking water refill points for all staff across the office. We continued to liaise with our landlord around a review of water supply to the building and appropriate monitoring to assist the CCPC in reducing its water use to no avail, but we will continue our efforts in 2025 and 2026.

5.8 Waste Management

The CCPC provided segregated bins across all floors; organic/biowaste, recycling and general waste. As the CCPC occupies a building with two other tenants, and all tenants use the same bins, it may be difficult to accurately track waste generation. The Green Team will consider the possibility of a plan to progressively reduce waste generation.

The CCPC supports Ireland's Producer Responsibility Initiatives in the collection and recycling of products and will continue to proactively promote the Re-turn scheme.

The Green Team also hope to be in a position to deliver a presentation of effective waste management in the Autumn 2025.

5.9 Organic Food

The CCPC has two relevant contracts in place:

- Contract for provision of meeting refreshments, and
- Contract for the supply of milk.

The meeting refreshments contract expires in April 2026 but has an option to renew for an additional 12 months. In line with the Climate Action Mandate, the CCPC order organic produce for items that contain fresh beef, lamb, pork, poultry, fish, vegetables and for cereals and dairy products, where practicable.

The contract for the supply of milk does not expire until 2028 and therefore the CCPC will amend its order immediately so that a minimum of 10% by value (€) of milk bought is certified organic.

5.10 Procurement of ICT equipment

The CCPC has procured ICT end user products (desktop computers, portable computers and mobile phones) that are certified to EPEAT Gold Standard, as far as practicable, which signifies the highest level of environmental sustainability for electronic products, and will continue to do so.

5.11 Our buildings and vehicles

5.11.1 Promoting cycling and shared mobility

The CCPC promotes cycling through the provision of a secure bike shed, the availability of a bicycle pump and puncture repair kit and through participation in NTA bike to work initiatives. The bike shed facility is available to both staff and visitors to the CCPC who wish to travel sustainably.

The CCPC is a National Transport Authority (NTA) Smarter Travel Partner and has achieved a bronze level Smarter Travel Mark. In this regard, the Green Team will further consider opportunities to increase the level and will continue to promote NTA initiatives.

5.11.2 Phasing out parking

The CCPC has 14 carpark spaces for approximately 248 staff which represents 5% of our staff allocation. Parking is part of the existing lease agreement between the OPW and the landlord and there are no plans to renegotiate our lease.

5.11.3 Procurement of cleaning contracts

The CCPC's current contract for cleaning services expires in 2026. The CCPC tender for the indoor cleaning services that issues in 2026 will include a requirement for tenderers to specify the training that will be put in place to ensure that all staff involved in delivery of the contract have the knowledge and skills to apply cleaning methods, which will reduce the environmental impact of the services.

5.11.4 Buildings

The CCPC occupies a building leased by the OPW and is limited in improving the building. However, the CCPC resources are due to continue to increase significantly which means we require additional accommodation. The CCPC will engage with the OPW on any proposal with a view to minimising the CCPC's carbon emissions and supporting compliance with the Mandate.

The CCPC has input core data on the pilot Building Register System, see appendix 1.

5.11.5 Procurement of zero emissions vehicles

The CCPC has a contract in place to lease vehicles. Where practicable a hybrid model is leased. It is not possible for the CCPC to lease full Electric Vehicles (EVs).

Appendix 1: Building Stock Plan



Stage 1 Building Stock Plan

M&R PB ID	PSO-00331 ORGANISATION Competition and Consumer Protection Commission		
STEP 1 Identify and classify your buildings	Total number of buildings identified and classified	TOTAL	1
	Total number of sites/campuses identified	TOTAL	1
	Total floor area (m2)	TOTAL	1733.18
	Percentage in state ownership	Percentage	0%
	Percentage rented or leased	Percentage	100%
	* Classification 1	Office Building	TOTAL
		TOTAL	
STEP 2 Complete the building register	The SEAI Building Register has been completed for all buildings for Competition and Consumer Protection Commission		Status Fully complete
STEP 3 Use M&R and other data to quantify energy use and identify buildings that are biggest users and emitters	The largest energy using buildings have been identified and linked to the M&R and energy use data Note the largest energy using buildings are those accounting for over 80% of the organisational heat use.		
	No of largest energy use buildings	TOTAL	N/A
	Heat usage of largest energy use buildings/ organisational heat usage	%	n/a
	No of largest energy use buildings that are leased	TOTAL	N/A
STEP 4 Identify buildings that have been earmarked for exit in short-medium term	Number of buildings planned for exit - if known	TOTAL	1
	Total floor area of buildings planned for exit - if known	TOTAL	1733.18
	Commentary (the degree to which the increase or decrease will impact your fossil fuel use)		
	Unknown		
STEP 5 Undertake a preliminary assessment of your accommodation needs to 2030 & beyond	Preliminary future assessment of accommodation needs		
	Accommodation floor area requirements to 2030	INCREASE STATIC DECREASE	50% % %
	Commentary (the degree to which the increase or decrease will impact your fossil fuel use)		
	Unknown		
Building Stock Plan STAGE 1 Completed by			
Completed by	Sandra Rafferty		Email Sandra.Rafferty
* Please use the classification categories used in the Building Register			



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