



An tOmbudsman Seirbhísí
Airgeadais agus Pinsean

Financial Services and
Pensions Ombudsman

2025 Climate Action Roadmap



Contents

1.0 Introduction	5
1.1 Regulation, Legislation and Reporting Requirements	6
1.1.1 Key Public Sector Targets and Obligations:.....	6
1.1.2 Regulatory Instruments and Directives:	6
1.1.3 FSPO Annual Report – 2025 Reporting Requirements.....	7
1.2 Progress to date	7
2.0 Our Targets	9
2.1 Carbon Emissions Analysis.....	9
2.1.1 Current GHG Emissions	11
2.2 Energy Efficiency Analysis	11
2.2.1 Current Energy Consumption.....	11
2.3 Analysis of Significant Emitters.....	13
2.3.1 Natural Gas Heating System.....	13
2.4 Opportunities to Improve Efficiency and Meet Targets.....	13
2.4.1 Heating system upgrade Lincoln House.....	13
2.4.2 Increased efficiency in use of office space	14
2.4.3 Energy Management	14
2.4.4 Register of Opportunities.....	14
3.0 Our People - Leadership and Governance.....	16
3.1 Organisational commitment	16
3.2 Sustainability Champion and Energy Performance Officer.....	16
3.3 Governance Structure.....	16
3.4 FSPO Green Team	17
3.5 Staff Training Plans.....	17
3.6 Climate Action and Sustainability Workshops.....	18
4.0 Our Way of Working.....	19
4.1 Annual Report Obligations.....	19
4.2 Energy Management Programme.....	19
4.3 Energy and Environmental Management Systems	20
4.4 Digitisation of Processes	20
4.5 Green Procurement.....	21
4.5.1 Use of Resources.....	22
4.5.1.1 Construction	22
4.5.1.2 Organic Food	22
4.5.1.3 Food Waste.....	22



4.5.1.4 ICT Equipment.....	22
4.5.1.5 Paper	23
4.5.1.6 Water	23
4.5.1.7 Single-Use Items	23
4.5.1.8 ReTurn – Deposit Return Scheme.....	24
4.5.1.9 Contracted Waste Collection Services.....	24
4.5.1.10 Installation of EV Charging Infrastructure.....	24
4.5.1.11 Air Travel Carbon Emissions	24
4.5.1.12 Display Energy Certificate	24
5.0 Buildings and Vehicles	26
5.1 Vehicles.....	26
5.1.1 Promoting Active Travel	26
5.1.2 Phasing Out Parking	26
5.1.3 Procurement of Zero Emission Vehicles.....	26
5.2 Buildings	26
5.2.1 Fossil fuel heating systems.....	27
5.2.2 Building Stock Plans.....	27
5.2.2 Display Energy Certificate.....	27
5.2.3 Fossil Fuel Systems 27	28
6.0 Conclusion.....	29



Revision History

Version	Date	Author(s)	Approved by SMT
1	30 Sep 2025	Eugene Windrim, Facilities Manager	14 October 2025



1.0 Introduction

The FSPO was established in January 2018 by the Financial Services and Pensions Ombudsman Act 2017. The role of the FSPO is to resolve complaints from consumers, including small businesses and other organisations, against financial service providers and pension providers. We provide an independent, fair, impartial, confidential and free service to resolve complaints through either informal mediation, leading to a potential settlement agreed between the parties, or formal investigation and adjudication, leading to a legally binding decision.

As a public body we are keen to meet or exceed our Public Sector Climate Action Mandate 2025 commitments and to develop, promote and extend initiatives in the drive towards a more sustainable future. This 2025 FSPO Climate Action Roadmap is presented in support of that commitment.

The World Meteorological Organization (WMO) has confirmed that 2024 was the warmest year on record based on six international datasets. The past ten years have all been in the Top Ten, in an extraordinary streak of record-breaking temperatures.

Key Takeaways:

- The past ten years, 2015-2024, have been the ten warmest on record
- We have likely seen the first calendar year with a global mean temperature of more than 1.5°C above the 1850-1900 average
- 2024 saw exceptional land and sea surface temperatures and ocean heat
- Long-term temperature goal of the Paris Agreement not yet dead but in grave danger (WMO, 2025)

Ireland must play its part in reducing global temperatures by investing in structural and behavioural change to enable the transition to a climate neutral and climate-resilient economy. These changes include the rapid decarbonisation of energy and transport and the adoption of sustainable food production, management and consumption systems.

Ireland is one of 190 countries that signed up to the Paris Agreement that aims to limit global warming to well below 2°C and to limit the increase to 1.5°C.

Ireland has committed to a reduction in emissions of 51% by 2030 (compared to 2018 levels) and to being climate neutral no later than 2050. This means that the amount of greenhouse gases emitted to the atmosphere is matched by the removal of an equal volume.



As a public body, the FSPO has an obligation to play its part in climate change mitigation through the implementation of this Climate Action Roadmap.

The FSPO recognises the importance of having these measures in place to allow us to be as energy efficient as possible and to be environmentally conscious while upholding our public mandate at the same time.

1.1 Regulation, Legislation and Reporting Requirements

The FSPO is firmly focused on compliance with the requirements of the Public Sector Climate Action Mandate 2025.

This year's Mandate comprises four components, each of which identifies action areas that are integral to the 2025 FSPO road map.

The four areas are defined below and are presented according to the Mandate Template:

- Targets (Section 2)
- People (Section 3)
- Way of Working (Section 4)
- Buildings and Vehicles (Section 5)

1.1.1 Key Public Sector Targets and Obligations

- Reduction of energy related GHG emissions by 51% in 2030
- Improvement of energy efficiency in the public sector by 50% by 2030
- Update Climate Action Roadmaps annually within 6 months of the publication of the Climate Action Plan

1.1.2 Regulatory Instruments and Directives

- Climate Action and Low Carbon Development (Amendment) Act 2021, which requires all public bodies to perform their functions in a manner consistent with Ireland's climate ambition.
- SI393/2021 Energy Performance of buildings, which requires installation of Building Automation and Control by 2025 for buildings with HVAC rated output over 290kW; requires installation of electric vehicle charging points in car parks for new or refurbished buildings with more than 10 car parking spaces.
- SI381/2021 Clean Vehicles Directive, which sets targets for the procurement of clean light and heavy-duty vehicles, with the first target falling in 2025 and the second in 2030. The definition of clean vehicle changes to zero emission vehicles in 2025.



- SI4/2017 Energy Performance of Buildings, which requires all new public sector buildings built since 2018 to be “nearly zero emissions”.
- SI646/2016, which requires that public bodies only procure 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 and also requires that the public sector can only lease or buy buildings with BER A3 or higher.
- SI749/2024, Energy Performance of Buildings Directive, banning public bodies from providing grants for fossil fuel boilers.

1.1.3 FSPO Annual Report – 2025 Reporting Requirements

The reporting of progress against Climate Action Mandate requirements is now a key requirement within a public bodies’ Annual Report.

At a minimum they must include:

- Current greenhouse gas emissions and comparison to 2016-18 baseline as per M&R
- Progress towards implementation of the requirements of the most recent Mandate
- A report of sustainability activities undertaken by the organisation within the last year to include relevant sustainability activities that do not fall strictly within the requirements of the Mandate
- Evidence of compliance with Circular 1/2020: Procedures for offsetting the emissions associated with official air travel

The FSPO has developed a Strategic Plan for 2025-2027, to address increasing complaint number and complexity. As we look to our external environment, we can see that the international and policy context is also challenging and uncertain. New regulatory requirements are being developed, and this is all occurring alongside demographic changes, the introduction of pension auto-enrolment, increasing consumer awareness and heightened expectations.

Along with expanding staff numbers, the physical accommodation for the administrative functions of the office remains a significant consideration to the pursuit of compliance with sustainability, GHG reduction and energy efficiency requirements. Nonetheless, in all aspects of the business, sustainability remains a key objective.

1.2 Progress to date

Since its inception in 2018, the FSPO, like its predecessors, the Financial Services Ombudsman (FSO) and the Pensions Ombudsman, has taken steps to reduce its impact



on the environment over intervening years.

Energy consumption data reporting has been conducted faithfully since 2009 for its offices at Lincoln House and more recently, for its Clare Street office.

Although our tenancy in leased accommodation is set to expire in 2026, and our future accommodation terms are, as yet, undecided, the necessary office fitouts and refurbishments which have been undertaken have been informed by sustainable choices at every opportunity. Energy reduction has been an objective part of all development specifications:

- Installation of double glazing at over 80% of office space in Lincoln House
- More efficient use of open plan office space
- Monitoring and control of office temperatures
- Replacement of all lighting in Lincoln House with LED fittings and introduction of motion detection switches in all existing spaces. These are standard requirements of any further office space refits
- Selection of more energy efficient IT equipment when upgrading and renewing



2.0 Our Targets

The FSPO and all public sector bodies are obliged to meet the targets set out in the 2025 Climate Action Mandate which are:

- Reduce GHG emissions by 51% by 2030 compared to the average emissions in baseline years 2016 - 2018.
- Reduce energy consumption to 50% by 2030 when compared to energy consumption 2009.
- Update Climate Action Roadmaps annually in line with updated Public Sector Climate Action Mandate.

Greenhouse gas emissions are taken to be energy-related carbon dioxide-equivalent (CO²e) emissions. The baseline for the FSPO is taken as the average of 2016-2018 emissions.

2.1 Carbon Emissions Analysis

Our total target CO²e reduction is derived as follows:

- 51% reduction of direct fossil fuel related CO²e emissions (thermal and transport consumption); plus
- projected supply side reductions in indirect fossil fuel related CO²e emissions from electricity.

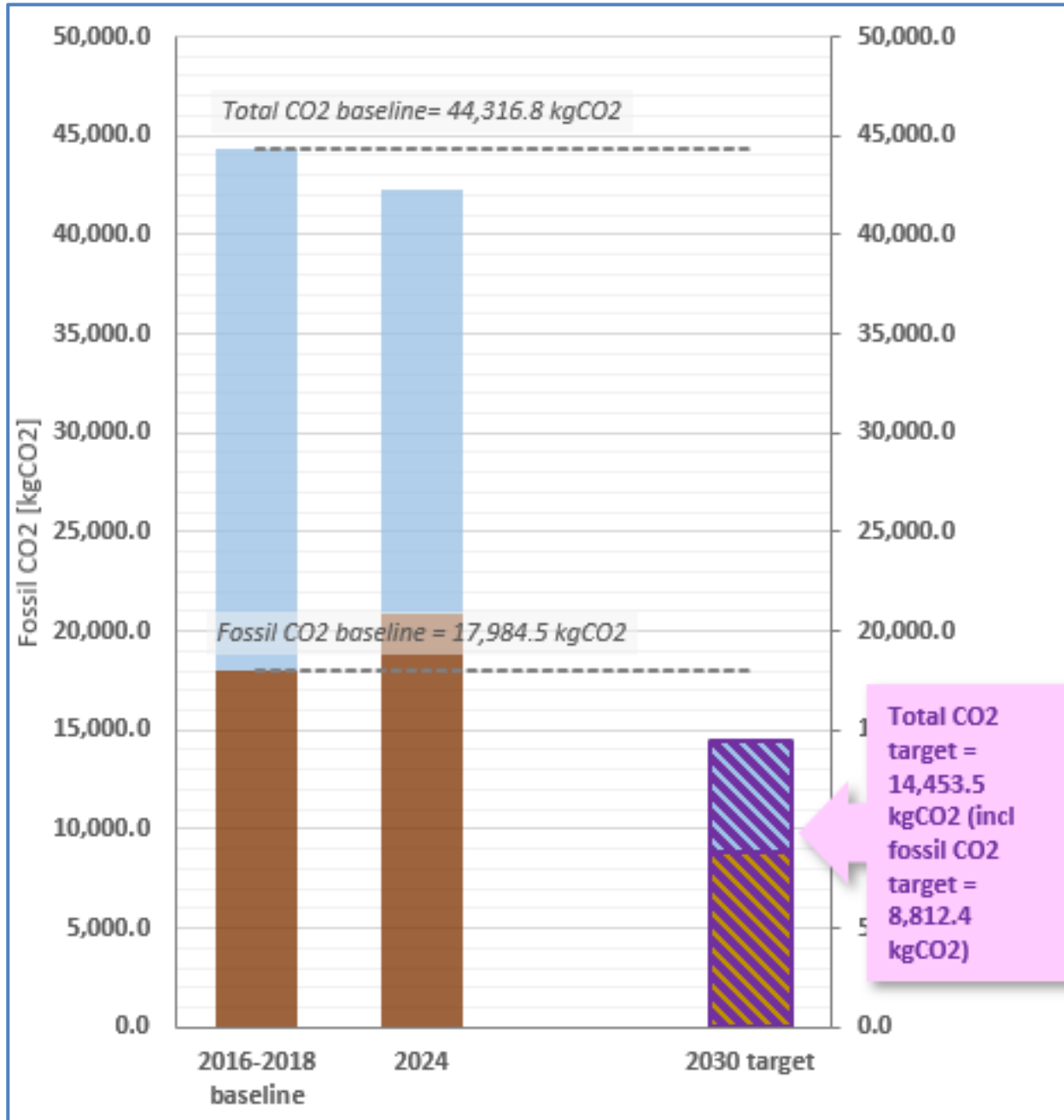
FSPO Baseline CO²e emissions; (kgCO²):

Thermal CO ²	Transport CO ²	Fossil CO ²	Electricity CO ²	Total CO ²
17,984.5	0.0	17,984.5	26,332.4	44,316.8

(Averages, 2016-2018)



Our Gap-To-Target is shown in the following graphic:



Max CO² that can be emitted in 2030 if targets defined in this worksheet are to be achieved.

Any growth in emissions between the baseline and target years, based on planned increase/growth in services, is difficult to plot as staff headcount has increased by over 50% since the baseline years and continues to grow. The increased headcount has been accommodated by efficient use of available space and adoption of remote working measures, the impact of which is also difficult to compute when other environmental impacts are considered, i.e. reduced public and private transport emissions, etc.



2.1.1 Current GHG Emissions

Total annual emissions for the FSPO as of 2024, is 42,218 kgCO².

Table below shows baseline emissions, current emissions and gap to 2030 target.

2030 Emissions Targets (kg CO ² per year)	Fossil CO ²	Electricity CO ²	Total CO ²
Progress since GHG Baseline			
2016-2018 Baseline	17,984.5	26,332.4	44,316.8
Change since baseline	2,892.6	-4,991.5	-2,098.9
2024	20,877.1	21,340.8	42,218.0
Impact of Decarbonisation and other measures			
Supply-side & BAU adjustments	0	-13,798.5	-13798.5
Retrofits & efficiency	0	0	0
Heat pumps	0	0	0
Biomass boilers	0	0	0
Other fuel switching, (heat)	0	0	0
Electric vehicles	0	0	0
High-blend biofuels	0	0	0
CNG (transport)	0	0	0
100% RES-E	0	0	0
Increased energy use	0	0	0
Total modelled changes	0	-13,798.5	-13798.5
2030 & gap to target			
2030 scenario	20,877.1	7,542.3	28,419.4
Gap to target in 2030 (negative value indicates GTT)	-12,064.7		-13,965.9
2030 targets	8,812.4		14,453.5

2.2 Energy Efficiency Analysis

2.2.1 Current Energy Consumption

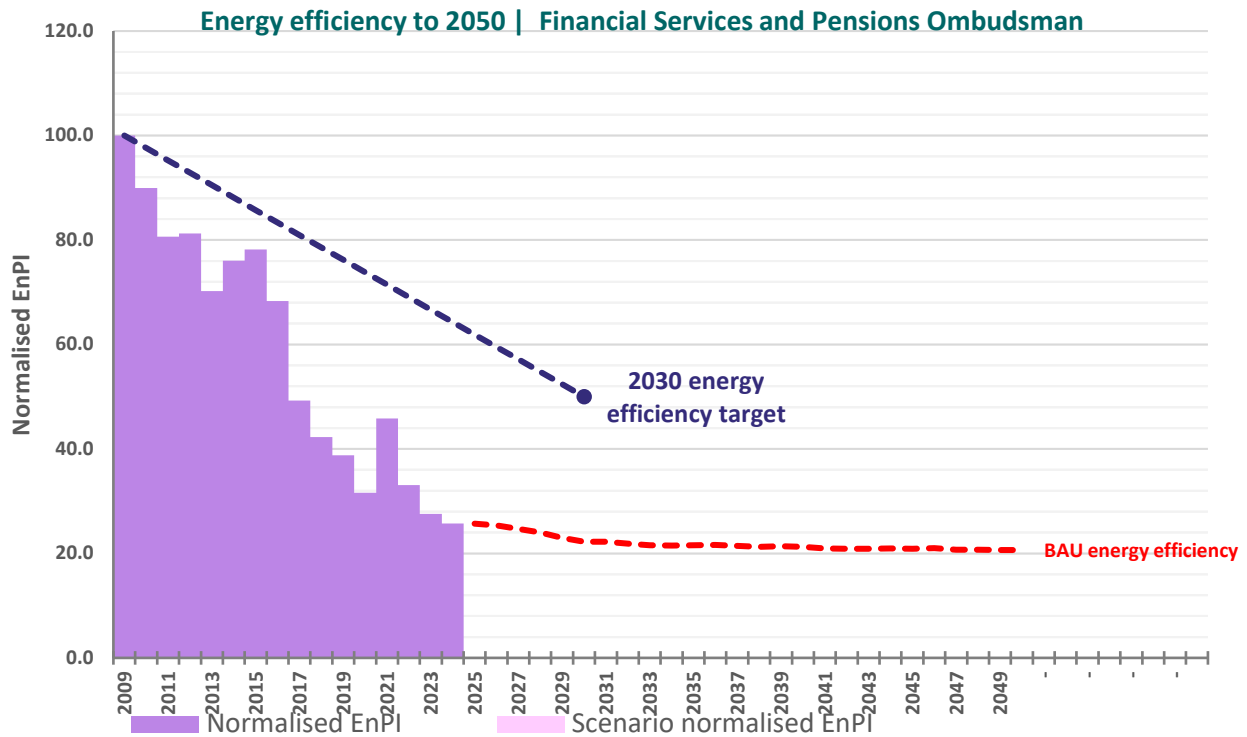
Total annual weather adjusted energy consumption for the organisation based on 2024 data:

Source	kWh
Electricity Grid	81,159
Fossil (Gas)	101,968
Transport	0
Total	183,127



Graphic Showing Energy Efficiency to 2050, where:

- EnPI is Energy Performance Indicator
- BAU is Business as Usual



Energy Efficiency	kWh
Base line energy usage 2009	137,171 (or 100%)
Current energy usage (2024)	183,127
Target energy usage	68,585
Gap to target	114,542

Note The organisation has grown from an FTE of 27 in 2009 to a headcount of 147 in 2025 with further growth anticipated. This increase in staff numbers has been achieved with a negligible increase (approx.5%) in leased space. This positive metric reflects efficiency in space management and work practices.



2.3 Analysis of Significant Emitters

2.3.1 Natural Gas Heating System

At a consumption level of 113,047 kWh for 2024, natural gas-powered heating continues to represent the FSPO's single biggest contributor to GHGs and, unlike electricity, natural gas supplies are not likely to be replaced by renewable sources such as biomethane in the short term. However, an upgrade of the existing system as set out below, would result in a significant reduction in our natural gas consumption.

2.4 Opportunities to Improve Efficiency and Meet Targets

Increasing efficiency of heating systems and use of space are two ways by which the amount of GHG emissions can be reduced by the FSPO.

2.4.1 Heating system upgrade Lincoln House

The FSPO has staff located in two office locations, Lincoln House and Clare Street, both of which are leased spaces. Lincoln House is the bigger of the two offices and accommodates approx. 95% of FSPO staff.

Lincoln House was constructed in the 1970s and while the FSPO and our co-tenant have made alterations and improvements to the building fabric, as allowed under the conditions of the leases, there remains scope for further improvement.

For example: the building heating system is gas fired and does not have a Building Energy Management System (BEMS) with zoning controls; ancillary equipment associated with the system is old and inefficient.

Nonetheless, dialogue is currently underway and further opportunities to introduce improvements will be utilised where possible. A further survey has been commissioned to explore opportunities to introduce efficiencies and improvements in HVAC and air quality and results will inform future investment decisions.

Outputs from a wider building heating system survey also present opportunity to make significant improvements in energy consumption as shown in the following table. It should, however, be noted that negotiations regarding the FSPO's lease are ongoing and accordingly, the outcomes of these negotiations will be instrumental in determining policy and direction into the future.



Potential Improvement	Reduction in Gas Consumption	Reduction in System Electricity Consumption
Replacement of two existing gas boilers	18%	0%
Replace the current fixed Speed Circulation Pumps with Inverter Pumps.	8%	24%
Pipe Work and Insulation Remedial Works	2.5%	1.5%
Installation of New Open Protocol BMS	15%	8%
Installation of zone valves complete with heat meters for sub billing of zones	12%	3%
Replacement of Air Handling Unit (AHU) with new Variable Air Volume Unit	9%	20%
Installation of new Variable Air Volume boxes at each zone	4%	7%
Integration of existing AC systems into new BEMS	0%	11%

2.4.2 Increased efficiency in use of office space

The FSPO continues to strive towards optimal use of available space by using blended solutions of in-office and remote working rosters. Hot-desking is utilised in a limited manner due to technical challenges posed by software restrictions which currently limit this as a universal solution.

A recent space rationalisation project realised a 16% increase in desk numbers with consequent improvements in capacity.

As mentioned, while headcount continues to grow there is no plan to increase office space in the immediate term. Consideration around the continued need for leased accommodation at our Clare Street office is ongoing as the expiry of our lease in 2026 draws closer.

2.4.3 Energy Management

Energy readings on all meters, gas and electric, are collected monthly. This information is tabulated and used in conjunction with office temperatures which are also monitored. These data are used to regulate and maintain office temperatures as close to 19.5°C as possible in line with SEAI public sector guidance. These efforts have led to a reduction in heating costs for the last 3 years in the order of 15%.

2.4.4 Register of Opportunities

Following recent changes in personnel, the Green Team has been rejuvenated with a



new Chair and a refreshed membership. A schedule of regular meetings, which includes the development of a Register of Opportunities, is now underway. The development of the register will be key in determining a Sustainability Strategy going forward.

The aforementioned lack of certainty around our near-term accommodation plans renders meaningful projection of the following specifics more difficult to report accurately:

- Identification of future decarbonisation pathways
- Detail of specific projects, timelines and funding streams
- Resources in place to be mobilised
- Project readiness status

Nonetheless, the FSPO remains compliant in its reporting to the SEAI and its implementation of the climate action mandate.



3.0 Our People - Leadership and Governance

3.1 Organisational commitment

The Financial Services and Pensions Ombudsman (FSPO) is committed to meeting the requirements of the Climate Action Mandate 2025. This commitment is underpinned by the FSPO's Strategic Plan 2025-2027 which commits to, 'achievement of our annual Climate Action Roadmap requirements and targets', as well as measurement and management of energy consumption and pursuit of sustainable policies.

The FSPO recognises that the workforce remains our strongest asset. This asset represents a very capable resource and the primary agent of change in pursuit of corporate environmental aspirations. The FSPO Green Team is closely integrated with senior management to drive change and manage green initiatives in the workplace.

3.2 Sustainability Champion and Energy Performance Officer

Dr. Aoibhín de Búrca is the FSPO's Climate and Sustainability Champion and, in compliance with the requirements of the Public Sector Energy Strategy, 2017, is our Energy Performance Officer. Aoibhín is the Director of Corporate and Communication Services, is a member of the Senior Management Team (SMT) and manages all corporate and communications services as part of her portfolio.

3.3 Governance Structure

The Office of the Financial Services and Pensions Ombudsman (FSPO) was established on 01 January 2018 by Section 7 of the Financial Services and Pensions Ombudsman Act 2017, 'The FSPO Act'.

The FSPO's role is to resolve complaints between individuals, small businesses or other organisations and providers of financial services or pensions.

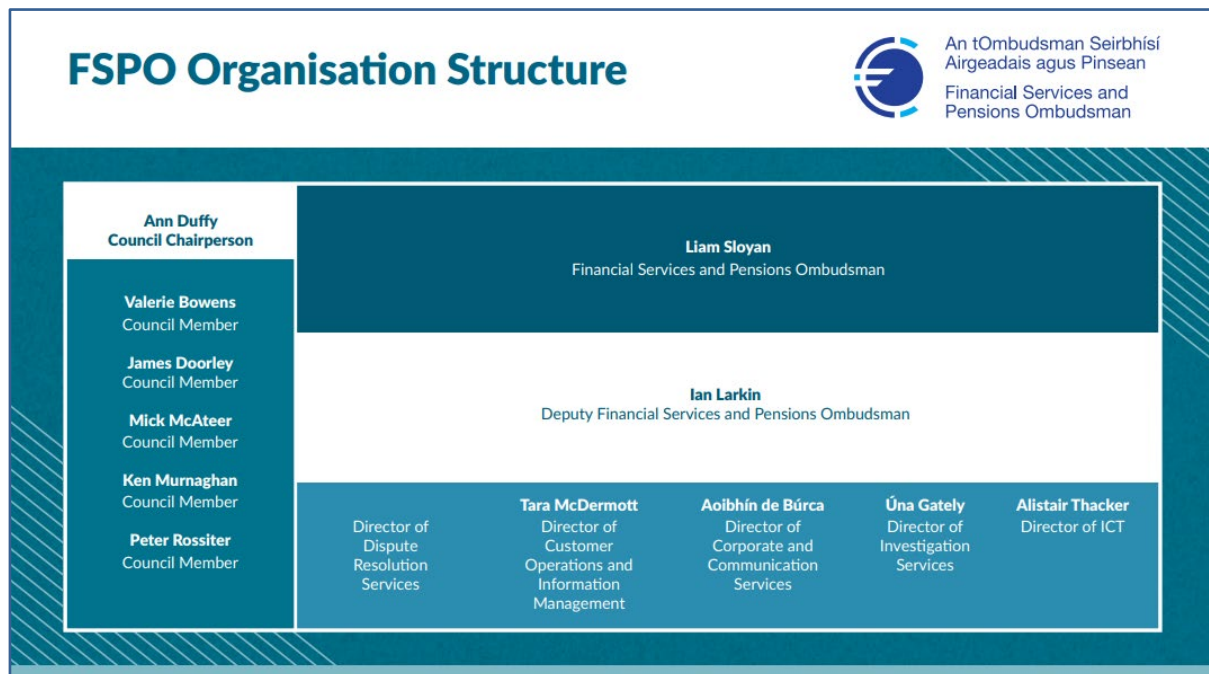
The Ombudsman and the SMT are responsible for ensuring good governance by setting strategic objectives and targets and taking strategic decisions on all key business issues. The regular day-to-day management, control and direction of the FSPO is also the responsibility of the Ombudsman and the SMT. Activities are aligned with the defined goals of Strategic Plan 2025-2027 and SMT ensures that Council members have a clear understanding of the activities and decisions as well as risks and mitigations and other relevant business performance metrics.

The current senior management team consists of the Ombudsman, the Deputy Ombudsman and four Directors.



The FSPO Council consists of a Chairperson and five members. The members of the Council are appointed for a term not exceeding 5 years.

FSPO Senior Management Team and Council



3.4 FSPO Green Team

The FSPO Green Team was established and terms of reference approved in 2024.

Team Member	Representation	Directorate
Úna Gately, (Chair)	Director of Investigation Services	IS
Brooke Mahon	Registry & Assessment CO	CCS
Eugene Windrim	Facilities Manager & Safety Officer	CCS
Jessica Neilan	Investigation Officer	IS
Linda Cruise	Investigation Officer	Tracker Team
Liz White	Senior Dispute Resolution Manager	IS
Peter O'Toole	Technical Support Officer	IT
Sadhbh Kurzawska	CCS Manager	CCS

3.5 Staff Training Plans

The FSPO Green Team will recommend a climate-action specific training plan as part of its remit for the period 2025 and 2026, which will be integrated into the organisation's overall Learning and Development plan.



Apart from ongoing attendance at SEAI webinars, workshops and info sessions, specific pieces of training are actively being pursued, e.g. Change By Degrees, Sustainability 101, as well as SEAI Energy Basics, Carbon Basics, Energy Map and Public Sector Climate Action Strategy 2023-2025.

In addition, and in compliance with requirement PS/23/9/A of CAP23, FSPO Senior Management Team members undertook the IPA's Climate Leadership training; and new members will do likewise in 2026.

3.6 Climate Action and Sustainability Workshops

The next FSPO Green Team Climate Action Workshop is scheduled for delivery in Q4 2025.



4.0 Our Way of Working

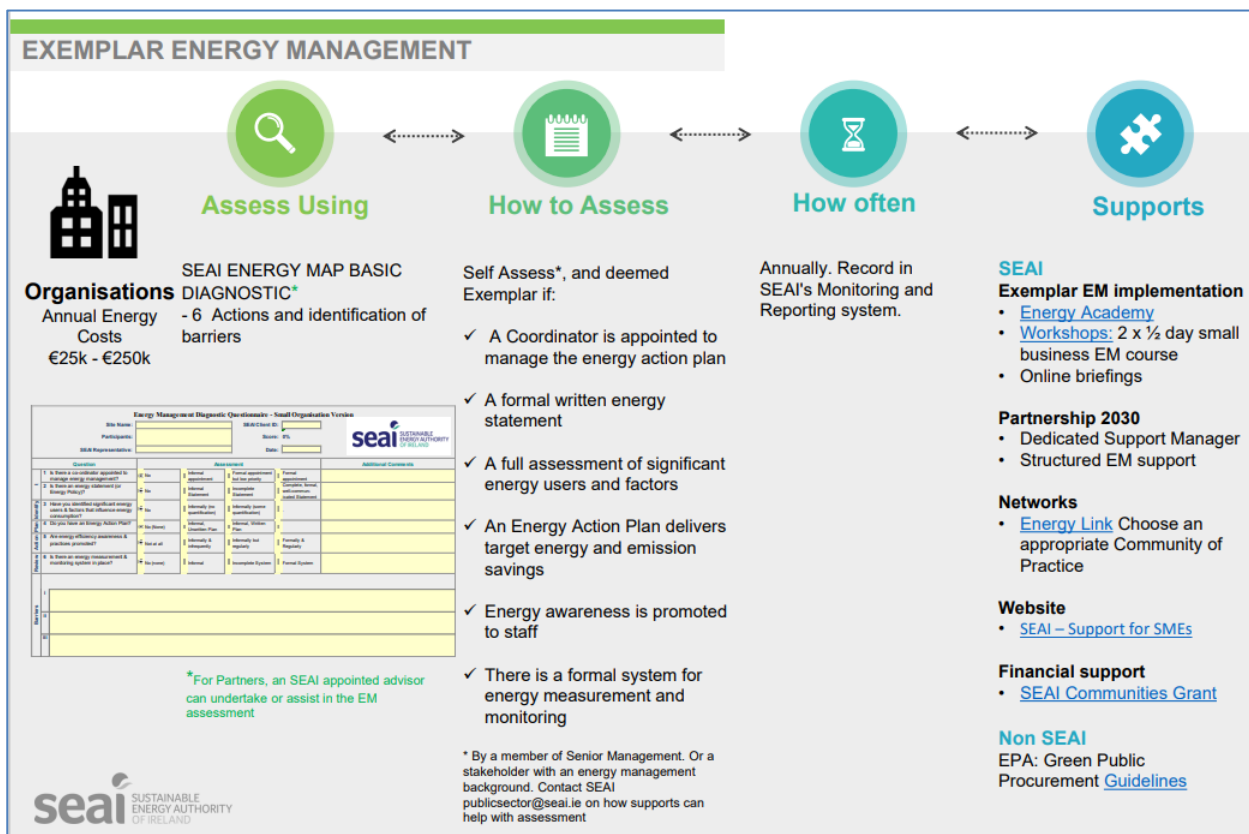
4.1 Annual Report Obligations

In line with requirements of the 2025 Mandate, the FSPO includes detail in its Annual Reports of

- GHG Emissions
- Implementation of the Mandate
- Sustainability Activities
- Compliance with Circular 1/2020, Procedures for offsetting emissions associated with Air Travel

4.2 Energy Management Programme

Beyond the requirements of M&R reporting and as per requirements of the 2025 Mandate, the FSPO aspires to engage an Energy Management Plan using the Exemplar EM template:



While this is as yet aspirational, it is hoped that resources to establish an EEM can be identified and directed at its development.



4.3 Energy and Environmental Management Systems

At present, the Lincoln House heating system does not feature any zoning functionality and for that reason heating costs are levied on a proportionate footprint basis to individual building tenants. This imperfect situation significantly impacts our ability to show improvements made by changes in behaviour and cut-backs such as turning down - or off - radiators and the reduction in “on” times of heating assets. Furthermore, we are exposed to the potential impact of poor practice by other building occupiers which will reflect negatively on our usage stats. Nonetheless, the FSPO continues to live right and to champion all sustainable practice opportunities.

The proposed heating system upgrade would provide users with control and measurement of the energy used in each zone by each tenant. Individual access to a central Building Management System would facilitate performance improvements and data capture.

4.4 Digitisation of Processes

The FSPO has eliminated the use of paper files for the majority of its processes. Of the 6,185 complaints received in 2024, 5,907 were closed as per the following table:

How we managed complaints in 2024



Historically, all of these 5,907 files would have been processed in printed format, but, following the adoption and improvement of digital processes, less than 500 needed to



be printed; even at that, printing was only required because sharing of files with external resources necessitated it. Further improvement in this metric is expected as innovation continues and consequential reductions in energy, paper, space and labour costs will accrue.

Moving to fully paperless processes remains a priority for the organisation. Projects are underway, including a significant file management system upgrade, which are expected to further improve processes and deliver benefits.

4.5 Green Procurement

Green procurement is a core component of all the FSPO's purchasing activity and processes.

Engagement where possible with OGP frameworks or dynamic purchasing systems with approved vendors is a given; ESG, GPP and the GPP Criteria Search are component parts of all tender processes.

The FSPO's Procurement Policy and the FSPO Corporate Procurement Plan 2025–2027 have recently been updated to reflect guidance from the OGP Circular 17/2025: *Updated Green Procurement Instructions for public Sector Bodies*, (21 July 2025). Specifically:

"The FSPO will promote the use of green public procurement options in criteria set out in its RFQs and RFTs where possible. It will also ensure consideration of how social and environmental issues can appropriately be integrated into each procurement process."

and,

"The FSPO will adhere to the GPP obligations included in the Buying Greener: GPP Strategy and Action Plan 2024 – 2027 as set out in Circular 17/2025: Updated Green Procurement Instructions for public sector bodies. It will ensure that all staff who are involved with any aspect of procurement receive annual training in relation to GPP obligations."

GPP Criteria Search is assessed at <https://gppcriteria.gov.ie>

In addition, the following qualitative criteria requirement is typically included in the FSPO requests for tenders:

"Tenderers are required to outline proposals on incorporating environmentally sustainable and/or social considerations into the delivery of the service (e.g. plans for



limiting energy consumption, responsible purchasing, reduction of carbon footprint, waste management, ethics and inclusivity, community involvement, volunteer and pro-bono work.”

Sustainability is also central to the processes and procurements of the FSPO Communications Team in the management of all events and all branded merchandise is procured from sustainable and plastics-free resources.

4.5.1 Use of Resources

4.5.1.1 Construction

The FSPO has no plans in the near term to engage in or procure construction services and so the provisions of the Circularity Roadmap for Public Sector Construction do not apply, however, obligations regarding low carbon construction requirements will remain part of any future planning in this regard.

4.5.1.2 Organic Food

Similarly, the FSPO does not procure foodstuffs per se or engage managed food services; canteen supplies of tea, coffee and milk, etc. are procured properly and in compliance with guidelines.

4.5.1.3 Food Waste

While food waste at the FSPO is negligible at less than 5-10Kg / month and consists only of canteen users’ own leftovers, we are aware of our obligations to monitor food waste management and segregation and the impending 2030 requirement for Ireland to halve waste generation.

Waste segregation and streaming processes are managed by Facilities and although negligible in volume, proper practices in disposal are in place and carefully monitored.

4.5.1.4 ICT Equipment

The FSPO adheres to national procurement policies by ensuring, where possible, IT purchases are made through the Office of Government Procurement Framework, guaranteeing compliance with established sustainability and regulatory guidelines. All ICT equipment acquisitions are recorded in our asset register, with periodic reviews conducted to confirm ongoing compliance with procurement and sustainability targets. The FSPO’s ICT policies promote the reuse of equipment and outline our commitment to responsible management of devices at end-of-life. Additionally, the FSPO is proactively



seeking ways to extend the lifecycle of ICT assets through refurbishment and reuse and remains committed to managing end-of-life equipment in accordance with producer responsibility requirements.

4.5.1.5 Paper

Further to 4.4 above, all printing paper and paper notebooks purchased by the FSPO are manufactured from recycled paper stock. Similarly, all paper used in the production of leaflets etc., is recycled and/or derived from FSC-accredited resources.

The use of paper diaries is discouraged; and use of digital alternatives is promoted.

The FSPO procures only recycled paper towel and tissue paper for hygiene purposes and has affected a change to use of compostable kitchen towel.

The FSPO does not purchase paper cups and has made Keep Cups available to staff. 100% of office wastepaper is securely shredded and recycled by our on-site shredding contractor from whom digital destruction certificates are received subsequent to service visits.

4.5.1.6 Water

Drinking water is provided for staff by way of drinking water fountains on each floor within our demised area. The fountains are maintained and serviced under a procured arrangement with the supplier for bi-annual filter changes and servicing.

No sub-metering exists on the landlord-managed site and so monitoring of volumes consumed or dispensed is not possible, nonetheless two eco-friendly dishwashers are in daily operation and are set in Eco mode, each consuming 11 litres of mains water per cycle. Their use by staff is encouraged and forms part of our contract cleaners' SOPs.

Leaks from plumbing systems are not tolerated and always repaired as an urgent priority. No low-flow equipment is installed but will form part of specification of any new infrastructure upgrades.

The FSPO Facilities Manager (FM) is an accredited European Water Steward.

4.5.1.7 Single-Use Items

The FSPO has eliminated the use of paper cups. Keep Cups were introduced and made available to staff, and all canteen cutlery is stainless steel for constant re-use. The need for bought bottled water has been eliminated by introduction of chilled drinking water



fountains on each floor as mentioned above. Compostable stirrers are provided for office drinks.

4.5.1.8 ReTurn – Deposit Return Scheme

The FM and Green Teams have taken ownership of this function, and it is to be promoted as a facility for staff to improve home recycling. As an ESG measure, it is also being promoted as a means of donating refunded monies to nominated charities.

4.5.1.9 Contracted Waste Collection Services

In keeping with 2025 Mandate requirements, outgoing waste is streamed and monitored. However, as we are resident in a shared building with landlord-controlled waste collection arrangements, we are unable to gather volumetric stats on disposal volumes. We have, however, been able to secure additional waste streaming resources, i.e., a blue bin for glass and a managed brown bin collection schedule, which we will continue to monitor.

4.5.1.10 Installation of EV Charging Infrastructure

As part of tenancy conditions, the FSPO has access to 8 parking spaces only in a private, landlord-owned car park. Since the FSPO plans to reduce or eliminate car parking, it is not currently considered practical to install EV charging infrastructure.

4.5.1.11 Air Travel Carbon Emissions

The FSPO reports on and is compliant with Circular 1/2020 requirements and publishes Air Travel emissions data as required in Annual Reports.

4.5.1.12 Air Travel

In 2024 the FSPO made four official trips, (8 journeys), by air, generating 4.3 tonnes* of CO₂e

**derived from [icao](#) computed data, specified by DCEE as resource for calculation of air travel CO₂e emissions*

In compliance with provisions of the Department Communications, Climate Action and the Environment Circular 01/2020, a contribution of €133.73 has been made to the Fund Manager of the Climate Action Fund.

4.5.1.13 Display Energy Certificate

The FSPO has attained the 2025 Display Energy Certificate; it is displayed as per guidance in our reception area.





5.0 Buildings and Vehicles

5.1 Vehicles

5.1.1 Promoting Active Travel

The FSPO's offices are at a city centre location that is well serviced by public transport.

The FSPO has taken measures to promote alternatives to car use as follows:

Provision of a secure bicycle/scooter parking shelter

Staff are encouraged at Induction to avail of the Bike to Work scheme

Information on Tax incentives available on Leap Card purchases is an Induction Talk topic

Active travel and use of car-pooling are promoted by the Green Team

Staff showering facilities are in place for joggers and cyclists

Staff are encouraged to use public transport to attend events where possible

5.1.2 Phasing Out Parking

As mentioned at 4.5.1.10 above, FSPO has access to 8 off-street parking spaces as part of our Lincoln House tenancy which is due to expire in 2026. Should a decision to renew our lease be adopted and prevailing circumstances permit, a reduction in the number of parking spaces will form part of lease renewal negotiations.

A smaller number of spaces may be retained to ensure that the FSPO's services will remain accessible to persons with a disability and to accommodate goods-in and contractor attendance requirements.

5.1.3 Procurement of Zero Emission Vehicles

The FSPO does not own or lease any vehicles and has no plans to acquire any at present.

In compliance with provisions of the Department Communications, Climate Action and the Environment Circular 01/2020, a contribution of €133.73 has been made to the Fund Manager of the Climate Action Fund.

5.2 Buildings



5.2.1 Fossil Fuel Heating Systems

The FSPO's Lincoln House offices are currently heated by mains supplied natural gas.

In the event that the FSPO moves to an alternative location after 2026, it will ensure that buildings with non-fossil fuel heating systems are considered in that process.

The FSPO has a Display Energy Certificate (DEC) which is to be seen at the 4th floor reception desk area.

5.2.2 Building Stock Plans

The FSPO Building Stock Plan, Stage 1 was submitted in 2024 as required by EU Directive 2023/1791 and continues to reflect the organisational footprint. It is scheduled for review in 2026 in accordance with guidance.

5.2.3 Procurement of Cleaning Contractors

The FSPO expects to tender for contract cleaning services in 2026. In that process, the 2025 Mandate stipulations will be followed, specifically, the inclusion in the RFT of requirement to ensure that contractor's staff have knowledge and skills to perform duties in sustainable and eco-empathetic way to comply with provisions of EPA GPP Criteria Indoor Cleaning, 2024.

5.2.4 Display Energy Certificate

The FSPO completed DEC recertification in July this year and our DEC is displayed at our Lincoln House reception area.

5.2.5 Fossil Fuel Systems

In accordance with section 4.4 of the 2025 Climate Action Mandate guidance, the FSPO will not install heating systems that consume fossil fuels either in new buildings or as part of renovation works. Furthermore, in accordance with the provisions of the Energy Performance of Buildings Directive, (EPBD), future tenders will comply with the following 2025 CAM provisions:

4.5 All tenders for the public procurement of energy-related products, heating equipment, or indoor and outdoor lighting to include a requirement for tenderers to specify recommendations and options for the product, when the product or components of the product comes to the end of life, that consider environmental sustainability, including options for reuse, repair, and recycling. Comply with SI 626 of 2016 to procure Triple E registered products or equivalent.



And

4.6 All tenders for the public procurement of indoor cleaning services to 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.



6.0 Conclusion

The FSPO Climate Action Roadmap 2025 is presented as a status update for the organisation and reports progress to date and ongoing plans to reduce our greenhouse gas emissions and efforts to increase energy efficiency as per the mandated requirements:

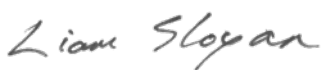
- Reduce GHG emissions by 51% by 2030 compared to the average emissions in baseline years 2016 - 2018.
- Reduce energy consumption to 50% by 2030 when compared to energy consumption 2009.
- Update Climate Action Roadmaps annually in line with updated Public Sector Climate Action Mandate.

The FSPO will continue to engage, educate and involve staff so that sustainability remains a primary consideration throughout the organisation's business functions.

The Senior Management Team will continue supporting the Green Team in their efforts to achieve sustainability goals.

The Green Team will continue to foster and promote best practice behaviours throughout the organisation.

The FSPO welcomes input from stakeholders to help achieve its sustainability goals.



Liam Sloyan,
Financial Services and Pensions Ombudsman.

Date 17 November 2025

