



PUBLIC DISCLOSURE STATEMENT

MEDIBANK PRIVATE LIMITED

**ORGANISATION CERTIFICATION
FY2020-21**

Australian Government
Climate Active
Public Disclosure Statement



An Australian Government Initiative



NAME OF CERTIFIED ENTITY: Medibank Private Limited

REPORTING PERIOD: 1 July 2020 to 30 June 2021

Declaration

To the best of my knowledge, the information provided in this Public Disclosure Statement is true and correct and meets the requirements of the Climate Active Carbon Neutral Standard.

Signature  Date 10/02/2022

Name of Signatory Nick Addison

Position of Signatory Senior Executive, Sustainability



Australian Government
Department of Industry, Science,
Energy and Resources

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Version number February 2021

1. CARBON NEUTRAL INFORMATION

Description of certification

This inventory has been prepared for the financial year from 1 July 2020 to 30 June 2021. This certification covers the Australian business operations of Medibank Private Limited ABN 47 080 890 259.

The operational boundary has been defined based on an operational control test, in accordance with the principles of the National Greenhouse and Energy Reporting Act 2007. This includes the following locations:

- 720 Bourke Street, Melbourne VIC 3000
- Level 11, 259 George Street, Sydney NSW 2000
- 77 Market Street, Wollongong NSW 2500
- 65 Canberra Avenue, Griffith ACT 2603
- Level 10, 300 Queen Street, Brisbane QLD 4000
- 82 Wattle Street, Fullarton, SA, 5063
- Ground Floor, Building B, 355 Scarborough Beach Road, Garden Office Park, Osborne Park WA 6000
- Retail locations across Australia

The methods used for collating data, performing calculations and presenting the carbon account are in accordance with the following standards:

- Climate Active Standards
- The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
- National Greenhouse and Energy Reporting (Measurement) Determination 2008

Where possible, the calculation methodologies and emission factors used in this inventory are derived from the National Greenhouse Accounts (NGA) Factors in accordance with "Method 1" from the National Greenhouse and Energy Reporting (Measurement) Determination 2008.

The greenhouse gases considered within the inventory are those that are commonly reported under the Kyoto Protocol; carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O) and synthetic gases - hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) sulphur hexafluoride (SF₆) and nitrogen trifluoride

“The health of our planet plays a critical role in the health and wellbeing of our people, our customers and our community, which is why we’ve announced our commitment to Net Zero ”

(NF3). These have been expressed as carbon dioxide equivalents (CO₂-e) using relative global warming potentials (GWPs).

Organisation description

At Medibank, we believe in Better Health for Better Lives. For 45 years, we've been supporting millions of people in Australia as one of the leading private health insurers. We're also changing into a health company as we provide people with greater support to manage their health and wellbeing. We're doing this by offering more choice to customers about where they can receive their care, more control over what they pay for it and innovating to provide greater access to preventative healthcare. We're partnering with leaders in the health sector – doctors, hospitals and research institutes – building new care options that deliver quality care, and we're helping to reform Australia's healthcare system so it can continue supporting all Australians. We also offer other insurance, including travel, pet and life, to make things easier for our customers – because everyone deserves to live their best quality of life.

Headquartered in Melbourne, Medibank has corporate offices in Canberra, Brisbane, Adelaide, Perth, Sydney, and Wollongong, and a significant work from home population. We have more than 80 retail stores across Australia, with more than 20 in regional areas.

2. EMISSION BOUNDARY

Diagram of the certification boundary



Non-quantified sources

Several expenditure related activities have continually been assessed but not counted in the final inventory due to low materiality (<1.0% of overall emissions). These include: Stationery, Printing, Merchandising, Clothing, Food & Catering, Couriers, Freight, Florists and Office Furniture. Medical Waste has also been non-quantified due to immateriality.

Data management plan

N/A.

Excluded sources (outside of certification boundary)

- Advertising has been excluded as it has been assessed as not relevant according to the relevance test.

Our approach to carbon offsets is to invest in a combination of Australian credits which support Aboriginal and Torres Strait Islander communities and international projects most aligned to our Sustainable Development Goals

3. EMISSIONS SUMMARY

Emissions reduction strategy

We understand climate change presents a risk to our customers, our people and our operational and financial performance. Medibank has committed to Net Zero by 2050 and this year we undertook our first climate scenario analysis to strengthen our understanding of the risks and opportunities of climate change. As a result, Medibank has made a number of commitments to reduce our environmental impact, including:

- committing to Net Zero and developing a pathway to reduce emissions;
- an ongoing commitment to carbon neutrality each financial year;
- becoming a supporter of the Taskforce for Climate-related Financial Disclosures (TCFD) recommendations and reporting to the TCFD framework;
- maintaining a low carbon equity portfolio for both our international and domestic investments
- Investing in green bonds.

Our emissions reduction actions involve:

- committing to Net Zero and developing a pathway to reduce emissions;
- measuring and reporting on our energy consumption and carbon footprint;
- ensuring our premises are environmentally efficient;
- setting public targets around reducing our environmental impact;
- educating and engaging our customers and people about how they can reduce their emissions and environmental impact
- engaging with the broader healthcare sector to share learnings and collaborate
- an employee-led environmental sustainability working group, dedicated to taking climate action;
- analyzing our waste streams to understand how we could reduce waste and improve recycling
- actively shifting to and maintaining a low carbon investment portfolio across both our domestic and international equity investments;
- offsetting our annual residual carbon emissions to achieve net-zero emissions, by purchasing offsets that meet the requirements of the Climate Active Standard.

Emissions over time

This year, we focused on improving and increasing our data capture across our business, to enable us to set a solid baseline for target setting and emissions reductions pathways. As a result, we identified additional Scope 3 emissions sources not previously captured within our baseline. These include:

- First aid supplies and medical services – these have been included within our assessment following the acquisition of our Home Support Services (HSS) and Healthstrong businesses that provide in-home and community care. This has contributed an additional 382.6 tCO₂e.
- ICT Services – Our increased IT emissions occurred as we migrated a number of our services to cloud platforms to increase data security, reliability and access. We have ensured that we capture the full impact of the resultant off-site electricity use within our emissions profile. This has contributed an additional 3,626 tCO₂e
- Cleaning Services – while contributing only 65.7 tCO₂e to our overall footprint, Cleaning Services have been included this year in recognition of their increased COVID19 led importance within our operations.

In addition to the above, this year we engaged with the building owners of our key commercial buildings to obtain base building utility information, thereby improving the accuracy of reported information beyond industry NABERS averages.

Table 1

Emissions since base year				
	Base year: 2017-18	Year 2: 2018-19	Year 3: 2019-20	Current year: 2020-21
<i>Total tCO₂-e</i>	17,825.8	13,420.7	12,652.2	15,629.6

Emissions reduction actions

A like-for-like comparison of FY20 and FY21 shows a 13.5% total decrease in emissions which is primarily due to:

- COVID19 related reductions in utilities and services
- The Medibank Head office at 720 Bourke street has been supplied with 100% renewable energy for base building electricity since July 2020 through the Melbourne Renewable Energy Project (MREP)

Over the past 12 months, Medibank has:

- Committed to Net Zero emissions by 2050
- Embedded environmental sustainability into plans for our new Melbourne workspace to open 2024.
- Improved and increased our data capture which helped identify additional Scope 3 emissions

- Launched a training module designed to help our people consider the environment when making purchasing decisions
- Conducted internal education session to help our people reduce their emissions while working from home
- Supported our customers to reduce their environmental impact by rewarding them with points through our Live Better program
- Analysing our waste streams to identify reduction activities and improve recycling

Emissions summary (inventory)

Table 2

Emission source category	tonnes CO ₂ -e
Accommodation and facilities	469.45
Air Transport (km)	316.22
Bespoke	176.96
Carbon neutral products and services	0
Cleaning and Chemicals	65.66
Electricity	3,639.44
ICT services and equipment	6,078.37
Land and Sea Transport (fuel)	705.75
Land and Sea Transport (km)	66.12
Office equipment & supplies	3.60
Postage, courier and freight	662.30
Products	370.11
Professional Services	26.57
Stationary Energy	125.01
Waste	183.60
Water	12.85
Working from home	2,727.63
Total Net Emissions	15,629.65

Uplift factors

Table 3

Reason for uplift factor	tonnes CO ₂ -e
N/A	
<i>Total footprint to offset (uplift factors + net emissions)</i>	15,629.65

Carbon neutral products

- Carbon neutral office paper

Electricity summary

Electricity was calculated using a market-based approach.

Market-based approach summary

Table 4

Market-based approach	Activity Data (kWh)	Emissions (kgCO ₂ -e)	Renewable %
Behind the meter consumption of electricity generated	0	0	0%
Total non-grid electricity	0	0	0%
LGC Purchased and retired (kWh) (including PPAs)	536,818	0	11%
GreenPower	0	0	0%
Jurisdictional renewables	23,794	0	0%
Jurisdictional renewables (LRET) (applied to ACT grid electricity)	5,694	0	0%
Large Scale Renewable Energy Target (applied to grid electricity only)	936,255	0	19%
Residual Electricity	3,375,478	3,639,440	0%
Total grid electricity	4,878,039	3,639,440	31%
Total Electricity Consumed (grid + non grid)	4,878,039	3,639,440	31%
Electricity renewables	1,502,561	0	
Residual Electricity	3,375,478	3,639,440	
Exported on-site generated electricity	0	0	
Emission Footprint (kgCO ₂ -e)		3,639,440	

Emission Footprint (tCO₂-e)	697
LRET renewables	19.8%
Voluntary Renewable Electricity	11.00%
Total renewables	30.80%

Location-based approach summary

Table 5

Location-based approach	Activity Data (kWh)	Emissions (kgCO ₂ -e)
ACT	29,488	26,539
NSW	807,715	726,944
SA	271,006	140,923
Vic	3,353,152	3,654,936
Qld	0	0
NT	0	0
WA	346,324	242,427

Tas	0	0
Grid electricity (scope 2 and 3)	4,878,039	4,857,197
ACT	0	0
NSW	0	0
SA	0	0
Vic	0	0
Qld	0	0
NT	0	0
WA	0	0
Tas	0	0
Non-grid electricity (Behind the meter)	0	0
Total Electricity Consumed	4,878,039	4,857,197

Emission Footprint (tCO₂-e)	4,857
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4. CARBON OFFSETS

Offsets strategy

Table 6

Offset purchasing strategy:	
In arrears	
1. Total offsets previously forward purchased and banked for this report	0
2. Total emissions liability to offset for this report	15,630
3. Net offset balance for this reporting period	15,630
4. Total offsets to be forward purchased to offset the next reporting period	0
5. Total offsets required for this report	15,630

Co-benefits

Wind Based Power Generation by Mytrah Energy (India) Limited (90% of offsets)

In addition to generating renewable energy, Mytrah Energy's projects seek to achieve additional benefits to the local community. They promote rural development through fodder cultivation to feed animals, integrated livestock development (artificial Insemination), shade nets to cover vegetable crops, and youth training and skill development. They also promote improvements in health with a project to enhance access to preventative healthcare and early diagnosis and intervention for a population of 100,000 in Hyderabad slums, and by upskilling 100 healthcare volunteers. There are also associated sanitation benefits such as the construction of individual household latrines, reducing incidents of communicable and waterborne diseases, empowering women, establishing 7 safe drinking water RO plants in 3 states, and eradicating dental and skeletal fluorosis in target villages. There is also a focus on education by facilitating secondary coaching and certification along with training on life skills to 500 adolescent girls who had dropped out of school before the Grade X examination, establishing 4 Community Resource Centres, recruiting and training 8 teachers, controlling open defecation and promoting personal hygiene, and developing content in conjunction with UNICEF.

Nyaliga Fire Project (10% of offsets)

The Nyaliga Fire Project is based in the East Kimberly Region of Northern WA. Savanna burning is a fire management method that prevents destructive bushfires (prevalent in tropical savannas of northern

Australia) by reducing the fuel load in a controlled manner and therefore reducing greenhouse gas emissions. By practicing traditional patchwork burning in the early dry season when fires are cooler and by burning less country, there are fewer emissions released and more carbon is stored in the soil and plants, keeping the land healthy for the local people.

This method generates Australian Carbon Credit Units (“ACCU”) and in turn brings environmental, social and cultural co-benefits such as:

- Elders sharing traditional ecological knowledge with young people;
- Protection of life, infrastructure, cultural places and species habitat
- Meaningful employment aligning with the interests and values of Traditional Owners; and
- Contribution to increased pride and self- esteem of Aboriginal people.

Offsets summary

Proof of cancellation of offset units

Table 7

Offsets cancelled for Climate Active Carbon Neutral Certification										
Project description	Type of offset units	Registry	Date retired	Serial number (and hyperlink to registry transaction record)	Vintage	Eligible Quantity (tCO ₂ -e)	Quantity used for previous reporting periods	Quantity banked for future reporting periods	Quantity used for this reporting period claim	Percentage of total (%)
Bundled Wind Power Project by Mytrah Group	VCUs	Verra	20/10/21	6918-358631897-358644183-VCU-034-APX-IN-1-1728-01012017-24112017-0 7638-416181343-416181343-VCU-034-APX-IN-1-1728-01012017-24112017-0 7638-416181105-416181341-VCU-034-APX-IN-1-1728-01012017-24112017-0	2017	12,525	0	0	12,525	80.1%

Bundled Wind Power Project by Mytrah Group	VCUs	Verra	18/11/2021	7638-416181342-416181342-VCU-034-APX-IN-1-1728-01012017-24112017-0 6918-358664384-358665947-VCU-034-APX-IN-1-1728-01012017-24112017-0	2017	1,565	0	0	1,565	10.0%
Nyaliga	ACCUs	ANREU	19/11/2021	3,793,863,046 – 3,793,863,111	2019/20	40	0	0	40	0.3%
Nyaliga	ACCUs	ANREU	22/10/2021	3,793,868,894 - 3,793,870,393	2019/20	1,500	0	0	1,500	9.6%
Total offsets retired this report and used in this report										15,630
Total offsets retired this report and banked for future reports										0
Additional offsets cancelled for purposes other than Climate Active Carbon Neutral certification										
Project description	Type of offset units	Registry	Date retired	Serial number (and hyperlink to registry transaction record)	Vintage	Eligible Quantity (tCO ₂ -e)	Purpose of cancellation			
Nyaliga	ACCUs	ANREU	19/11/2021	3,793,863,046 – 3,793,863,111	2019/20	26	Additional offsets to cover ACT Electricity use included in Medibank's annual report			

Type of offset units	Quantity (used for this reporting period claim)	Percentage of Total
Australian Carbon Credit Units (ACCU)	1,540	10%
Verified Carbon Units (VCUs)	14,090	90%

5. USE OF TRADE MARK

Table 8

Description where trademark used	Logo type
Medibank Sustainability Report	Certified organisation

6. ADDITIONAL INFORMATION

N/A

APPENDIX 1

Excluded emissions

To be deemed relevant an emission must meet two of the five relevance criteria. Excluded emissions are detailed below against each of the five criteria.

Table 9

Relevance test					
Excluded emission sources	<i>The emissions from a particular source are likely to be large relative to the organisation's electricity, stationary energy and fuel emissions</i>	<i>The emissions from a particular source contribute to the organisation's greenhouse gas risk exposure.</i>	<i>Key stakeholders deem the emissions from a particular source are relevant.</i>	<i>The responsible entity has the potential to influence the reduction of emissions from a particular source.</i>	<i>The emissions are from outsourced activities previously undertaken within the organisation's boundary, or from outsourced activities typically undertaken within the boundary for comparable organisations.</i>
Advertising	Yes	No	No	No	No

APPENDIX 2

Non-quantified emissions for organisations

The following sources have been non-quantified on the basis that individually they contribute no more than 1%, and not more than 5% collectively.

Table 10

Non-quantification test				
Relevant-non-quantified emission sources	<i>Immaterial <1% for individual items and no more than 5% collectively</i>	<i>Quantification is not cost effective relative to the size of the emission but uplift applied.</i>	<i>Data unavailable but uplift applied. A data management plan must be put in place to provide data within 5 years.</i>	<i>Initial emissions non-quantified but repairs and replacements quantified</i>
Stationery	Yes	No	No	No
Printing	Yes	No	No	No
Merchandising	Yes	No	No	No
Clothing	Yes	No	No	No
Food & catering	Yes	No	No	No
Florists	Yes	No	No	No
Couriers	Yes	No	No	No
Freight	Yes	No	No	No
Office Furniture	Yes	No	No	No
Medical Waste	Yes	No	No	No

APPENDIX 3

ACCU Registration certificates



25 October 2021

To whom it may concern,

Voluntary cancellation of units in ANREU

This letter is confirmation of the voluntary cancellation of units in the Australian National Registry of Emissions Units (ANREU) by ANREU account holder, Carbon Financial Services Pty Ltd (account number AU-2321).

The details of the cancellation are as follows:

Date of transaction	22 October 2021
Transaction ID:	AU20094
Type of units	KACCU
Number of units	1,500
Serial number range (Associated ERF Project ID)	3,793,868,894 -3,7936,870,393 – ERF109670 Nyaliga Fire Project
Transaction comment	Offsets retired against Medibank's FY20/FY21 GHG footprint.

Details of all voluntary cancellations in the ANREU are published on the Clean Energy Regulator's website, <http://www.cleanenergyregulator.gov.au/OSR/ANREU/Data-and-information>.

If you require additional information about the above transactions, please email registry-contact@cer.gov.au

Yours sincerely,

David O'Toole
ANREU and International
NGER and Safeguard Branch
Scheme Operations Division
Clean Energy Regulator
registry-contact@cer.gov.au
www.cleanenergyregulator.gov.au



26 November 2021

To whom it may concern,

Voluntary cancellation of units in ANREU

This letter is confirmation of the voluntary cancellation of units in the Australian National Registry of Emissions Units (ANREU) by ANREU account holder, Carbon Financial Services Pty Ltd (account number AU-2321).

The details of the cancellation are as follows:

Date of transaction	19 November 2021
Transaction ID:	AU20367
Type of units	KACCU
Number of units	66
Serial number range (Associated ERF Project ID)	3,793,863,046 -3,793,863,111 – ERF109670 Nyaliga Fire Project
Transaction comment	Offsets retired against Medibank's FY21 GHG footprint

Details of all voluntary cancellations in the ANREU are published on the Clean Energy Regulator's website, <http://www.cleanenergyregulator.gov.au/OSR/ANREU/Data-and-information>.

If you require additional information about the above transactions, please email registry-contact@cer.gov.au

Yours sincerely,

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