# PUBLIC DISCLOSURE STATEMENT

TELSTRA

PRODUCT CERTIFICATION
FY2021-22

Australian Government

# Climate Active
# Public Disclosure Statement

An Australian Government Initiative

| | |
|---|---|
| NAME OF CERTIFIED ENTITY | Telstra Corporation Limited (ABN 33 051 775 556) up to and including 31 December 2022 and Telstra Group Limited (ABN 56 650 620 303) and all of its group entities as from 1 January 2023 |
| REPORTING PERIOD | Financial year 1 July 2021 – 30 June 2022<br>Arrears report |
| 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.*<br><br>  <br><br>Justine Rowe<br>Chief Sustainability Officer<br><br>7 February 2023 |

Australian Government
Department of Climate Change, Energy, the Environment and Water



Version March 2022.

# 1.CERTIFICATION SUMMARY

| | |
|---|---|
| TOTAL EMISSIONS OFFSET | 76,979 tCO2-e |
| THE OFFSETS BOUGHT | 12% VCUs, 87% CERs, 1% ACCUs |
| RENEWABLE ELECTRICITY | Total renewables 21.41% |
| TECHNICAL ASSESSMENT | Date: 8/12/2022<br>Wibishana Rockwood<br>Deloitte Risk Advisory Pty Ltd<br>Next technical assessment due: 8/12/2025 |
| THIRD PARTY VALIDATION | Type 3<br>Date: 07 Feb 2023<br>Name: Terence Jeyaretnam<br>Organisation: Ernst and Young |

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# 2. CARBON NEUTRAL INFORMATION

## Description of certification

This Public Disclosure Statement (PDS) supports the carbon neutral claim under Climate Active's Carbon Neutral Standard for Products & Services for mobile phone and mobile broadband plan products of Telstra Corporation Limited (ABN 33 051 775 556) up to and including 31 December 2022 and Telstra Group Limited (ABN 56 650 620 303) and all of its group entities as from 1 January 2023[1]. For mobile phone and mobile broadband plans this involves offsetting all relevant and attributable emissions associated with the manufacture, distribution, usage and end of life treatment of mobile Telstra-branded SIM kits on the Telstra mobile network.

*"We're reaching for our climate goals with Telstra being recognised as Australia's largest certified carbon neutral organisation."*

**Product description**

Greenhouse gas (GHG) emissions within our complete operational control relevant to Telstra-branded Mobile Phone and Mobile broadband plans, primarily the physical SIM kit and customer connection to Telstra's network have been captured in this certification. It does not include the embodied emissions associated with the physical handset,the device customers use, or the electricity for use outside of connecting the Mobile Phone and Mobile broadband plans to Telstra's network (e.g. apps, displaying video, camera). This approach to GHG accounting enables us to capture emissions for which we have the greatest authority to introduce and control reduction policies related to our emissions. The definitions of our products and services are provided below:

| | |
|---|---|
| **Mobile phone plans and mobile broadband plans including SIM kits (Product)** | *The provision of Telstra-branded mobile phone plans and Telstra Mobile Broadband plans via access to Telstra's network for the purposes of making and receiving calls and data.* |

The life cycle assessment approach for Telstra's mobile phone and mobile broadband plans is cradle-to-grave, considering all elements of the supply chains for Telstra's Mobile Phone and Data Pans and operations as listed in the emissions boundary diagrams in section 3. Telstra's Carbon neutral Mobile Phone and Data Pans are full coverage products, customers are not required to opt-in to receive carbon neutrality.

**Functional Units**

The functional unit for Telstra's Mobile Phone and Mobile broadband plans is the tonnage of carbon dioxide equivalent per Mobile Phone and Mobile broadband plans in service, otherwise internally referred to as the Services in Operation (SIO) during the reporting period. For confidentiality reasons we have not disclosed the number of SIO's we have in this report.

[1] Emissions associated with Telstra's Mobile Phone and Broadband Plans share a significant portion of emissions with Telstra's organisation certification. This overlap has been detailed in Section 5 below, and additional information relating to Telstra's Organisation certification can be found in Telstra's Organisation Public Dislcosure Statement.

# 3.EMISSIONS BOUNDARY

## Inside the emissions boundary

All emission sources listed in the emissions boundary are part of the carbon neutral claim.

**Quantified** emissions have been assessed as 'attributable processes' that become the product, make the product and carry the product through its life cycle. These have been quantified in the carbon inventory.

**Non-quantified** emissions have been assessed as attributable and are captured within the emissions boundary, but are not measured (quantified) in the carbon inventory. All material emissions are accounted for through an uplift factor. Further detail is available at Appendix C.

## Outside the emissions boundary

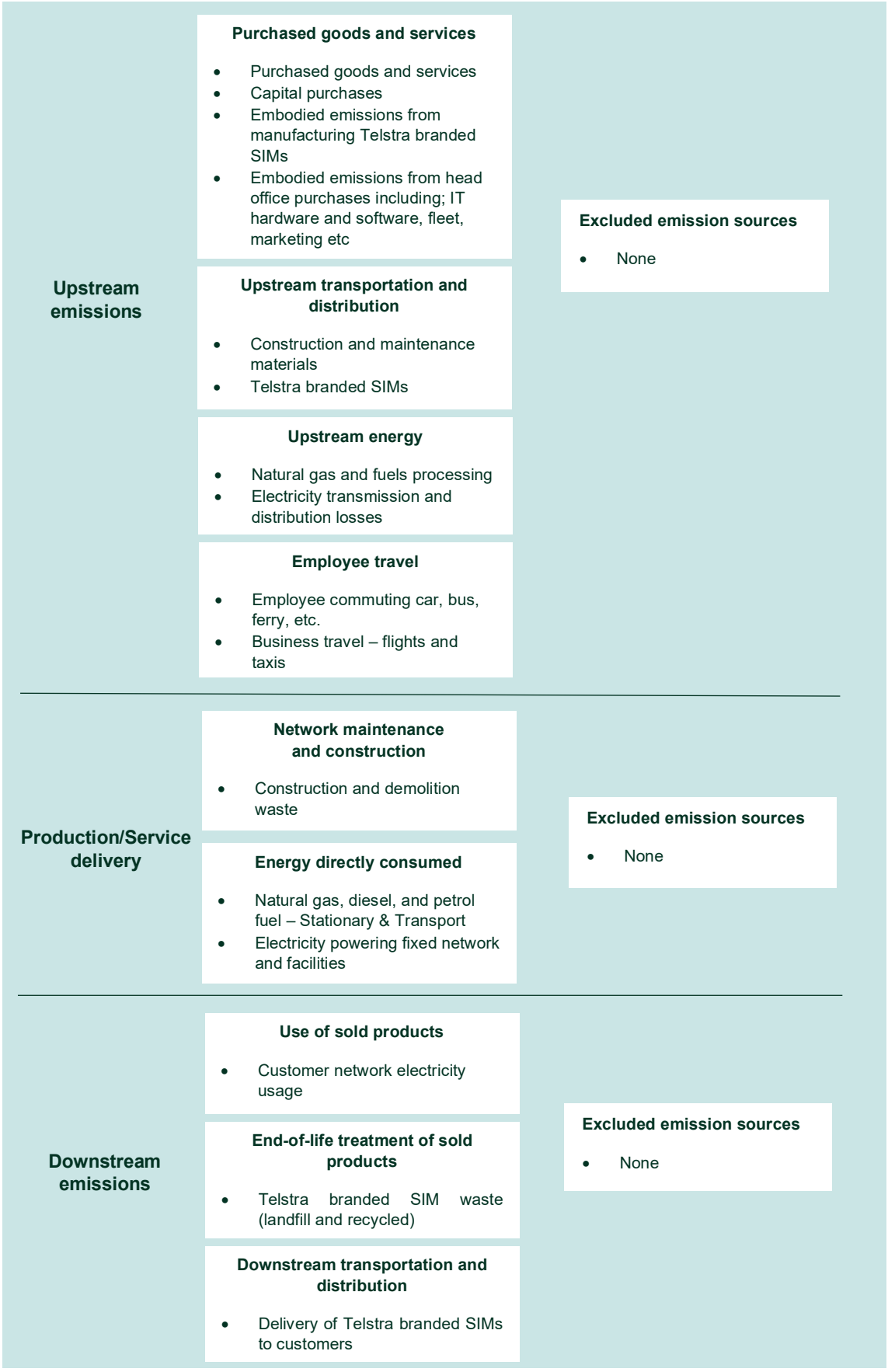
**Non-attributable** emissions have been assessed as not attributable to a product or service. They can be **optionally included** in the emissions boundary and therefore have been offset, or they can be listed as outside of the emissions boundary (and are therefore not part of the carbon neutral claim). Further detail is available at Appendix D.

**Diagram 3.1| Telstra Mobile Phone Plan[2] boundary**


[2] *Includes emissions associated with physical SIM kits and connecting customers of Telstra-branded mobile phone and mobile broadband plans to Telstra's network, It does not include the embodied emissions associated with the physical handset or device customers use.*

## Product/service process diagram

*Telstra Mobile Phone Plan process diagram (cradle-to-grave)*



## Data management plan for non-quantified sources

There are no non-quantified sources in the emission boundary that require a data management plan.

# 4. EMISSIONS REDUCTIONS

## Emissions reduction strategy[3]

Our Environment Strategy is aimed at accelerating our ambition to tackle climate change and creating a more sustainable future by using resources more sustainably and efficiently. We are committed to reducing our emissions footprint, optimising the resources we use, reducing consumption and waste across our business, and investing in circular solutions that are designed to be sustainable across their lifecycle. Management of our emissions footprint has been underpinned by our environmental strategy since 2013, which sets the precedence for our goals related to climate change, energy use and resource efficiency:

- **Carbon neutral** in our operations **from 2020**
- **Enable 100% renewable energy generation** equivalent to our consumption **by 2025**
- **Reduce our absolute emissions for Scope 1, 2 and 3 by at least 50% by 2030** from an FY19 baseline (3,974,980 $tCO_2$-e)
- **Reuse or recycle 500,000** mobile phones, modems and other devices **each year to 2025**
- **100% of Telstra branded packaging is made of renewable or recycled material** and is fully recyclable **by 2022**
- Increase our network **waste recycling rate to 85% by 2025**

As we move to being more sustainable and environmentally aware, this is an area where we can make significant impact with some small changes. These include:

- **More efficient packaging for our products**
  It is important to us that all materials we use in our packaging can be recycled by customers afterwards. As part of our commitment, we're also applying the Australasian Recycling Label to clearly identify how customers can recycle each packaging component.
- **Moving to plastic free distribution of consumer products**
  We've also begun work to reduce, then eliminate the use of the plastic courier satchels we use to deliver products to customers – we're choosing to use recycled paper packaging instead. When you're packaging and delivering products at the scale that we are, these small changes can add up to a big difference.
- **A more sustainable future through the Telstra eCycle Program**
  Between May and July 2021 we ran a trial to provide all Australians – not just Telstra customers – with a service to ensure certain devices they no longer need are reused or recycled responsibly. We're calling it the Telstra eCycle Program, and our ambition is to make it simple for Australians

[3] Please see Telstra's Climate Change Report 2022 for more information on Telstra's Emissions Reduction Strategy

to conveniently recycle e-waste on an on-going basis.

- **Turning landline phones into food with Australia Post and PonyUp for Good**
  During the eight-week program, PonyUp for Good collected and dismantled 6,791 handsets and 4,038 batteries and prepared them for recycling and retrieval of precious components including metals and plastics which will go back into making new products. PonyUp for Good then donated 50% of the profits from the sale of these recycled and reused materials to SecondBite, Australia's largest fresh food rescue charity, to provide meals for approximately 3,000 people in need.

- **Trade in your old phone for Telstra credit**
  Trade-in gives customers credit on their Telstra bill in exchange for an out of contract device they are no longer using. Customers can then use that credit to make purchasing a new device more affordable on a Telstra plan while also keeping their old phone in use and not in landfill. Third party Kingfisher acts as a second hand dealer and either recycles or refurbishes devices that are traded-in.

# 5.EMISSIONS SUMMARY

## Use of Climate Active carbon neutral products and services

| Certified brand name | Product or Service used |
|---|---|
| N/A | N/A |

## Product/Service emissions summary

| Stage | tonnes $CO_2$-e | Overlap with Telstra % | Offset for FY22 (tonnes $CO_2$-e) |
|---|---|---|---|
| Fuel (natural gas, diesel, petrol) | 3,615 | 100% | - |
| Electricity (purchased from the grid) | 113,185 | 100% | - |
| Purchased goods & services (embodied emissions) | 32,313 | 52% | 15,613 |
| Capital goods | 21,050 | 99% | 1 |
| Fuel & energy related emissions | 12,155 | 100% | - |
| Upstream distribution and transportation[4] | 11,378 | 17% | 9,478 |
| Waste generated in operations | 361 | 100% | - |
| Business travel | 623 | 100% | - |
| Employee commuting | 10,535 | 100% | - |
| Working from home | 3,634 | 100% | - |
| Use of sold products | 51,886 | 0% | 51,886 |
| End of Life treatment of sold products | - | 0% | - |

| | |
|---|---|
| **Emissions intensity per functional unit** | *Commercial in Confidence* |
| **Number of functional units to be offset** | *Commercial in Confidence* |
| **Total emissions to be offset** | 76,979 |

[4] This emissions category has been calculated using spend data and includes both upstream and downstream distribution and transportation emissions.

# 6. CARBON OFFSETS

## Offsets retirement approach

| In arrears | | |
|---|---|---|
| 1. | Total emissions footprint to offset for this report | 76,979 |
| 2. | Total eligible offsets purchased and retired for this report | 76,979 |
| 3. | Total eligible offsets banked to use toward next year's report | 0 |

## Co-benefits

| Offset Project | Co-benefits Description |
|---|---|
| Renewable Solar Power Project by ReNew Solar Power Private Limited, India | The main purpose of this project activity is to generate clean form of electricity through renewable solar energy sources. The project activity involves total capacity of 977 MW solar power project which are installed in Gujarat, Karnataka, Madhya Pradesh, Rajasthan and Telangana states of India. The solar projects have been developed by the SPVs of ReNew Power Limited. Over the 10 years of first crediting period, the project will replace anthropogenic emissions of greenhouse gases (GHG's) estimated to be approximately 1,511,532 tCO2e per year, thereon displacing 1,595,299 MWh/year amount of electricity from the generation-mix of power plants connected to the Indian grid, which is mainly dominated by thermal/fossil fuel based power plant. |
| Devarahipparigi Wind Energy Project, India | The main purpose of this project activity is to generate clean form of electricity through renewable wind energy sources. The project activity involves installation of a 100 MW wind power project in Karnataka state of India. Over the 10 years of first crediting period, the project will replace anthropogenic emissions of greenhouse gases (GHG's) estimated to be approximately 177,576 tCO2e per year, thereon displacing 183,960 MWh/year amount of electricity from the generation-mix of power plants connected to the Indian grid, which is mainly dominated by thermal/fossil fuel-based power plant. |

| | |
|---|---|
| Savanna Burning Investment Ready Project - Cape York Pilot Aurukun | This project involves the strategic and planned burning of savanna areas during the early dry season to reduce the risk of late dry season wild fires. |
| Wind Power Project at Tadas, Karnataka | The purpose of the project activity is to generate electricity using wind energy and to supply the net electricity generated to the individual customers in the Southern Tadas (India) grid through open access sale. This would reduce the dependency on fossil fuels for electricity generation and reduce the greenhouse gas (GHG) emissions that would have happened in a baseline scenario. The project activity is expected to generate 94,570 MWh of electricity per year. |
| Wind Power Project at Jath, Maharashtra | The purpose of the project activity is to generate electricity using wind energy and to supply the net electricity generated to the Indian grid. This would reduce the dependency on fossil fuels for electricity generation and reduce the greenhouse gas (GHG) emissions that would have happened in a baseline scenario. The total installed capacity of the project activity is 84.65 MW. |
| Wind Power Project at Vaspet, Maharashtra | The purpose of the project activity is to generate electricity using wind as renewable energy source and helping in reducing usage of fossil fuels which are used for electricity generation. This would reduce the dependency on fossil fuels and reduce the greenhouse gas (GHG) emissions. The project is expected to generate 660,975 tCO2 of GHG emission reductions during its first crediting period with annual average of 94,425 tCO2. |

## Eligible offsets retirement summary

| 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** | **Stapled quantity** | **Eligible quantity ($tCO_2$-e)** | **Eligible quantity used for previous reporting periods** | **Eligible quantity banked for future reporting periods** | **Eligible quantity used for this reporting period** | **Percentage of total (%)** |
| Savanna Burning Investment Ready Project - Cape York Pilot Aurukun | ACCU | ANREU | 21/09/2021 | 3799457230-3799462309 | 2020 | | 5,080 | 0[5] | 0 | 500 | 0.65% |
| Wind Power Project at Tadas, Karnataka | CER | CDM | 23/05/2022 | IN-5-283985614-2-2-0-9376 - IN-5-284053146-2-2-0-9376 | CP2 | | 67,533 | 0[6] | 0 | 15,800 | 20.53% |
| Wind Power Project at Jath, Maharashtra | CER | CDM | 31/05/2022 | IN-5-293670106-2-2-0-9154 - IN-5-293783059-2-2-0-9154 | CP2 | | 112,954 | 0[7] | 0 | 30,800 | 40.01% |

[5] While no offsets units were banked from previous reporting periods given that this is Telstra's first certification for mobile phone plans, offset units from this project have been retired for other certifications, namely 4,580 units have been retired for Telstra's Orgnisation FY22 certification.
[6] While no offsets units were banked from previous reporting periods given that this is Telstra's first certification for mobile phone plans, offset units from this project have been retired for other certifications, namely 51,733 units have been retired for Telstra's Organisation FY22 certification.
[7] While no offsets units were banked from previous reporting periods given that this is Telstra's first certification for mobile phone plans, offsets have been retired from this project for other certifications namely 82,154 units for Telstra's FY22 Organisation certification.

| | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Wind Power Project at Vaspet, Maharashtra | CER | CDM | 31/05/2022 | IN-5-293007761-2-2-0-8606 - IN-5-293078786-2-2-0-8606 | CP2 | | 71,026 | 0[8] | 0 | 20,000 | 25.89% |
| Wind Power Project at Tadas, Karnataka | CER | CDM | 21/06/2022 | IN-5-219257636-2-2-0-9376 - IN-5-219265308-2-2-0-9376 | CP2 | | 7,673 | 0[9] | 0 | 350 | 0.45% |
| Devarahipparigi Wind Energy Project, India | VCU | VERRA | 30/11/2020 | 7246-380549967-380699966-VCU-034-APX-IN-1-1793-25032017-31122017-0 | 2017 | | 150,000 | 0[10] | 0 | 4,800 | 6.24% |
| Renewable Solar Power Project by ReNew Solar Power Private Limited, India | VCU | VERRA | 07/07/2021 | 10703-240325574-240599810-VCU-VCU-997-VER-IN-1-1851-26102018-31122018-0 | 2018 | | 274,237 | 0[11] | 161,906 | 4,729 | 6.14% |
| | | | | | | | | | **Total offsets retired this report and used in this report** | 76,979 | |
| | | | | | | | | | **Total offsets retired this report and banked for future reports** | 238,885 | |

[8] While no offsets units were banked from previous reporting periods given that this is Telstra's first certification for mobile phone plans, offsets have been retired from this project for other certifications namely 51,026 units for Telstra's FY22 Organisation certification.
[9] While no offsets units were banked from previous reporting periods given that this is Telstra's first certification for mobile phone plans, offsets have been retired from this project for other certifications namely 7,323 units for Telstra's FY22 Organisation certification.
[10] While no offsets units were banked from previous reporting periods given that this is Telstra's first certification for mobile phone plans, offsets have been retired from this project for other certifications namely, in previous reporting periods for Telstra's FY21 Organisation certification (42,749), and in the current FY22 reporting period (102,451) for Telstra's Organisation certification.
[11] While no offsets were banked from previous reporting periods given this is Telstra's first certification for mobile phone plans, offsets have been retired for Telstra's FY22 Organisation certification (102,011) and for St Vincent De Paul Society Victoria (Vinnies Victoria) FY22 certification (5,591).

| Type of offset units | Quantity (used for this reporting period claim) | Percentage of total |
|---|---|---|
| Verified Carbon Units (VCUs) | 9,529 | 12.38% |
| Certified Emissions Reductions (CER) | 66,950 | 86.97% |
| Australian Carbon Credit units (ACCU) | 500 | 0.65% |

# 7. RENEWABLE ENERGY CERTIFICATE (REC) SUMMARY

## Renewable Energy Certificate (REC) Summary

N/A

The following RECs have been surrendered to reduce electricity emissions under the market-based reporting method.

| | |
|---|---|
| **1. Large-scale Generation certificates (LGCs)*** | N/A |
| **2. Other RECs** | N/A |

* LGCs in this table only include those surrendered voluntarily (including through PPA arrangements), and does not include those surrendered in relation to the LRET, GreenPower, and jurisdictional renewables.

| Project supported by LGC purchase | Eligible units | Registry | Surrender date | Accreditation code (LGCs) | Certificate serial number | Generation year | Quantity (MWh) | Fuel source | Location |
|---|---|---|---|---|---|---|---|---|---|
| N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| | | | | | | *Total LGCs surrendered this report and used in this report* | | | |

# APPENDIX A: ADDITIONAL INFORMATION

N/A

# APPENDIX B: ELECTRICITY SUMMARY

Market-based method

The market-based method provides a picture of a business's electricity emissions in the context of its renewable energy investments. It reflects the emissions intensity of different electricity products, markets and investments. It uses a residual mix factor (RMF) to allow for unique claims on the zero emissions attribute of renewables without double-counting.

## Market Based Approach Summary

| Market Based Approach | Activity Data (kWh) | Emissions (kgCO2e) | Renewable Percentage of total |
|---|---|---|---|
| Behind the meter consumption of electricity generated | 1,185,867 | 0 | 1% |
| **Total non-grid electricity** | **1,185,867** | **0** | **1%** |
| LGC Purchased and retired (kWh) (including PPAs & Precinct LGCs) | 0 | 0 | 0% |
| GreenPower | 0 | 0 | 0% |
| Jurisdictional renewables (LGCs retired) | 3,354,358 | 0 | 2% |
| Jurisdictional renewables (LRET) (applied to ACT grid electricity) | 765,969 | 0 | 1% |
| Large Scale Renewable Energy Target (applied to grid electricity only) | 27,484,886 | 0 | 18% |
| Residual Electricity | 120,362,807 | 119,756,631 | 0% |
| **Total grid electricity** | **151,968,020** | **119,756,631** | **21%** |
| **Total Electricity Consumed (grid + non grid)** | **153,153,887** | **119,756,631** | **21%** |
| Electricity renewables | 32,791,080 | 0 | |
| Residual Electricity | 120,362,807 | 119,756,631 | |
| **Exported on-site generated electricity** | **0** | **0** | |
| Emissions (kgCO2e) | | 119,756,631 | |

| | |
|---|---|
| **Total renewables (grid and non-grid)** | **21.41%** |
| **Mandatory** | **20.64%** |
| **Voluntary** | **0.00%** |
| **Behind the meter** | **0.77%** |
| **Residual Electricity Emission Footprint (TCO2e)** | **119,757** |

*Figures may not sum due to rounding. Renewable percentage can be above 100%*

## Location Based Approach Summary

| Location Based Approach | Activity Data (kWh) | Scope 2 Emissions (kgCO2e) | Scope 3 Emissions (kgCO2e) |
|---|---|---|---|
| ACT | 4,120,327 | 3,213,855 | 288,423 |
| NSW | 52,011,208 | 40,568,742 | 3,640,785 |
| SA | 10,247,059 | 3,074,118 | 717,294 |
| Vic | 39,221,388 | 35,691,463 | 3,922,139 |
| Qld | 27,107,472 | 21,685,977 | 3,252,897 |
| NT | 2,061,361 | 1,113,135 | 82,454 |
| WA | 14,289,185 | 9,573,754 | 142,892 |
| Tas | 2,910,020 | 407,403 | 58,200 |
| **Grid electricity (scope 2 and 3)** | **151,968,020** | **115,328,447** | **12,105,084** |
| ACT | 5,305 | 0 | 0 |
| NSW | 107,334 | 0 | 0 |
| SA | 82,325 | 0 | 0 |
| Vic | 109,283 | 0 | 0 |
| Qld | 317,080 | 0 | 0 |
| NT | 184,910 | 0 | 0 |
| WA | 377,714 | 0 | 0 |
| Tas | 1,918 | 0 | 0 |
| **Non-grid electricity (Behind the meter)** | **1,185,867** | **0** | **0** |
| **Total Electricity Consumed** | **153,153,887** | **115,328,447** | **12,105,084** |

| | |
|---|---|
| **Emission Footprint (TCO2e)** | **127,434** |
| *Scope 2 Emissions (TCO2e)* | 115328 |
| *Scope 3 Emissions (TCO2e)* | 12105 |

## Climate Active Carbon Neutral Electricity summary

| Carbon Neutral electricity offset by Climate Active Product | Activity Data (kWh) | Emissions (kgCO2e) |
|---|---|---|
| *N/A* | **0** | **0** |

*Climate Active carbon neutral electricity is not renewable electricity. The emissions have been offset by another Climate Active member through their Product certification.*

# APPENDIX C: INSIDE EMISSIONS BOUNDARY

### Non-quantified emission sources

The following sources emissions have been assessed as attributable, are captured within the emissions boundary, but are not measured (quantified) in the carbon inventory. These emissions are accounted for through an uplift factor. They have been non-quantified due to one of the following reasons:

1. **Immaterial** <1% for individual items and no more than 5% collectively
2. **Cost effective** Quantification is not cost effective relative to the size of the emission but uplift applied.
3. **Data unavailable** Data is unavailable but uplift applied. A data management plan must be put in place to provide data within 5 years.
4. **Maintenance** Initial emissions non-quantified but repairs and replacements quantified.

| Relevant-non-quantified emission sources | (1) Immaterial | (2) Cost effective (but uplift applied) | (3) Data unavailable (but uplift applied & data plan in place) | (4) Maintenance |
|---|---|---|---|---|
| Outsourced business processing (indirect BPO) | Yes | No | No | No |
| International broadband services | Yes | No | No | No |

### Excluded emission sources

| | No actual data | No projected data | Immaterial |
|---|---|---|---|
| N/A | N/A | N/A | N/A |

# APPENDIX D: OUTSIDE EMISSION BOUNDARY

Non-attributable emissions have been assessed as not attributable to a product or service (do not carry, make or become the product/service) and are therefore not part of the carbon neutral claim. To be deemed attributable, an emission must meet two of the five relevance criteria. Emissions which only meet one condition of the relevance test can be assessed as non-attributable and therefore are outside the carbon neutral claim. Non-attributable emissions are detailed below.

1. **Size** The emissions from a particular source are likely to be large relative to the organisation's electricity, stationary energy and fuel emissions
2. **Influence** The responsible entity has the potential to influence the reduction of emissions from a particular source.

3. **Risk** The emissions from a particular source contribute to the organisation's greenhouse gas risk exposure.

4. **Stakeholders** Key stakeholders deem the emissions from a particular source are relevant.

5. **Outsourcing** 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.

| Emission sources tested for relevance | (1) Size | (2) Influence | (3) Risk | (4) Stakeholders | (5) Outsourcing |
|---|---|---|---|---|---|
| Emissions associated with downstream leased assets | No | No | No | No | No |
| Mobile device electricity for use outside of connecting to the Telstra network (e.g. apps, displaying video, and camera) | Yes | No | No | No | No |
| Emissions associated with Franchises | No | No | No | No | No |
| Emissions associated with Telstra Investments | Yes | No | No | No | No |
| Emissions associated with Hazardous Waste | No | No | No | No | No |

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