



# **PUBLIC DISCLOSURE STATEMENT**

**FELIX**

**SERVICE CERTIFICATION  
CY2022**

Australian Government  
**Climate Active**  
**Public Disclosure Statement**

**felix**



An Australian Government Initiative



NAME OF CERTIFIED ENTITY	TPG Telecom Limited – Trading as felix mobile
REPORTING PERIOD	calendar year 1 January 2022 – 31 December 2022 arrears report
DECLARATION	<p><i>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.</i></p> <p><i>Paul Tierney</i></p> <hr/> <p>Paul Tierney          General Manager          20/11/23</p>



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

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Version March 2023.



# 1.CERTIFICATION SUMMARY

TOTAL EMISSIONS OFFSET	126 tCO <sub>2</sub> -e
THE OFFSETS USED	100% VCUs
RENEWABLE ELECTRICITY	100%
CARBON ACCOUNT	Prepared by: South Pole
TECHNICAL ASSESSMENT	14/06/2023 South Pole Next technical assessment due: CY 2025

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## 2. CARBON NEUTRAL INFORMATION

### Description of certification

felix's account covers the six GHGs covered by the Kyoto Protocol: carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulphur hexafluoride (SF<sub>6</sub>). All emissions are reported in tonnes of carbon dioxide equivalent (tCO<sub>2</sub>-e).

This Climate Active Service certification is for the business and customer support operations of felix. This service includes all emissions that are non-attributable to felix's Climate Active Carbon Neutral Product certification, but which are of relevance to the operations felix, as defined through the Climate Active Relevance Test.

The scope of this service includes:

- the operation of offices and call centres in Sydney and Hobart – including electricity consumption, waste, water, IT equipment, office machinery, and other consumables
- electricity and diesel consumption for data centres
- business travel
- employee commuting
- freight of goods
- third party business services (e.g., legal, marketing and advertising services)

The functional unit for this product certification is: 6 months of business and customer support services for one felix customer.

### Service description

felix is a digital mobile service provider, launched by TPG Telecom Limited (ABN 76096304620) in 2020, which offers mobile phone plans leveraging the TPG mobile network.

felix exists as a business unit within TPG Telecom Limited (ABN 76096304620) and is not a registered business with a unique ABN. As a result, certification as an 'Organisation' under the Climate Active Carbon Neutral Standard for Organisations was not possible.

felix has both a service and product Climate Active certification. The service certification is deemed to be the parent certification and as such, any shared emission sources between felix's product and service will be offset through the service certification only as per the Climate Active guidance on Emission boundary: Shared emissions.

The service certification covers all emissions associated with the administration and running of the felix business unit within TPG. The service is full coverage and includes the emissions from cradle-to-grave.

## 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' of a product or service. These attributable processes are services, materials and energy flows that become the product or service, make the product or service and carry the product or service through its life cycle. These attributable emissions 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.

## Inside emissions boundary

### Quantified

Stationary combustion fuels  
(incl. well-to-tank emissions)

Electricity – offices, data  
centre, and base building  
(incl. transmission and  
distribution losses)

Business travel

Waste

Water (supply and  
treatment)

Working from Home

Advertising and promotion

Employee commuting

### Non-quantified

Base building refrigerants

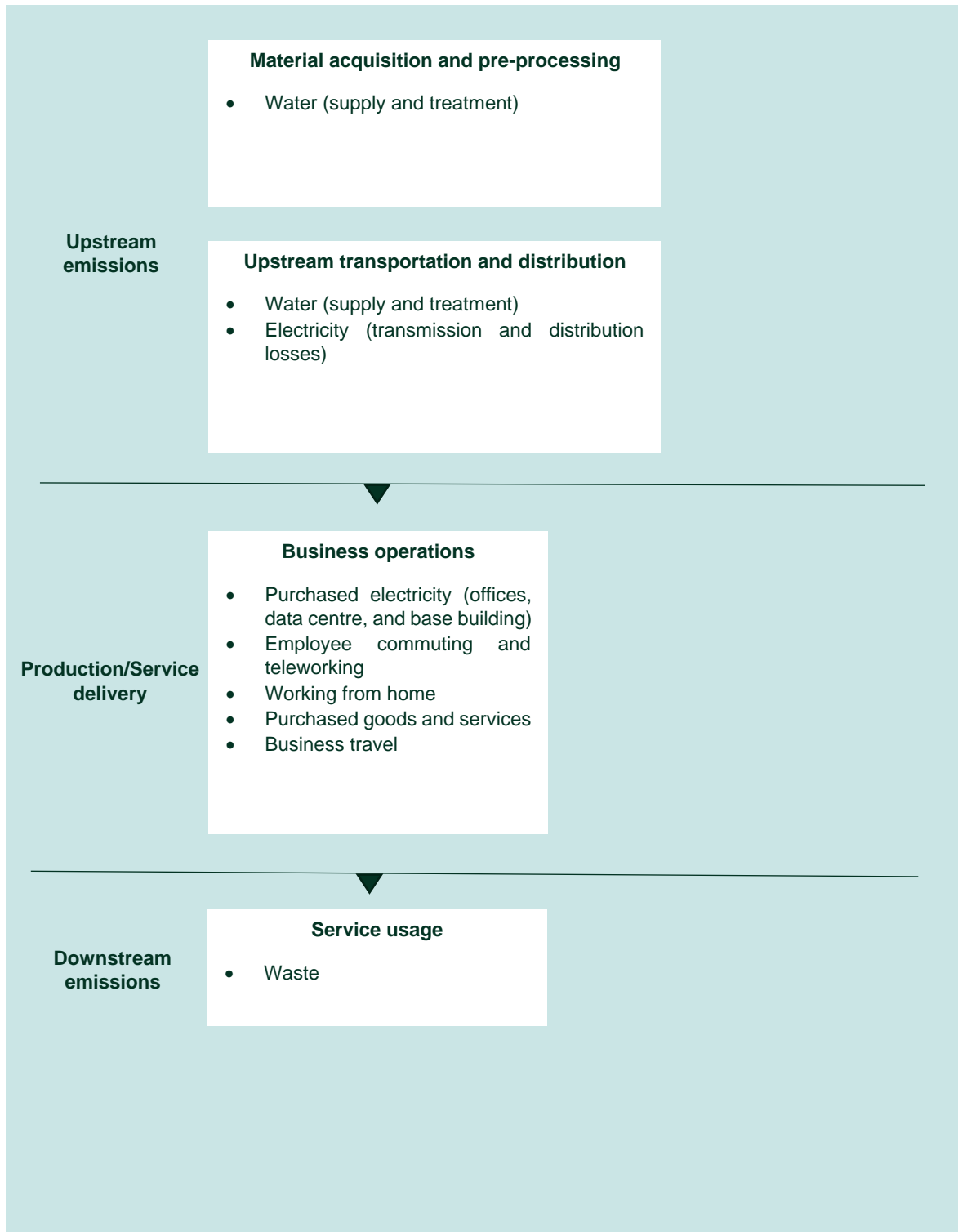
### Optionally included

## Outside emission boundary

### Non-attributable

Operations of prepaid  
points of presence  
where [brand] SIM  
cards sold (e.g.  
supermarkets, petrol  
stations, etc.)

## Service process diagram



## 4. EMISSIONS REDUCTIONS

### Emissions reduction strategy

Sustainability is one of our key foundational values and we strive to operate our business in an environmentally friendly way.

The felix service is provided using the TPG Telecom mobile network, and the operation of this mobile network uses electricity which in turn generates emissions. This electricity accounts for the majority of emissions relating to the felix product.

TPG Telecom have an ongoing focus on the energy efficiency of the mobile network and undertake various initiatives to reduce energy usage:

- Over the past six years, across the mobile network, older Uninterrupted Power Supply systems have been replaced with more energy efficient equipment.
- A range of design solutions have been introduced to improve energy efficiency and reduce emissions associated with mobile base stations including free cooling measures that improve airflow circulation using low powered fans, significantly reducing the need for air conditioning. At the Dean Park base station in NSW, TPG Telecom has seen a 90 per cent reduction in daily air conditioning use following the upgrade.
- In partnership with ICS Industries, TPG Telecom has contributed funding to support the development of the Zonecool™ shelter - a more efficient and cost-effective base station equipment shelter solution which targets cooling to specific zones and utilises high-capacity racking enabling optimal use of space for future technologies.
- Direct current power systems have also been implemented across all data centres and air conditioning chillers have been replaced with computer room air conditioning units, typically delivering an estimated 25 per cent energy saving.

In March 2021, TPG Telecom announced a commitment to power its entire operations across Australia with 100% renewable electricity by 2025 and committed to setting a Science-based Target for reducing greenhouse gas emissions across our value chain, aligned to net zero. As part of the commitment, the science-based targets will be developed in accordance with the Science Based Target initiative (SBTi), to ensure that the targets are credible, meaningful and in line with the latest climate science. The targets were developed and submitted to the SBTi in December and are expected to be validated in 2023. They will cover absolute emissions reductions across TPG Telecom's Scope 1, 2 & 3 emissions footprint and will include a 2030 target, as well as a 2050 net zero target.

For felix, these targets will reduce its Scope 3 emissions footprint in-line with the 2030 and net zero targets for TPG Telecom.

felix have designed our SIM cards and packaging to minimise waste, we have also launched eSIM technology to reduce the use of plastic related to the physical SIM. felix also intends to launch a partnership with MobileMuster to focus on reducing e-waste and offering our customers the opportunity to recycle their used mobile phones. All these measures also contribute to the reduction of emissions associated with waste.



## Emissions reduction actions

felix continued its ambition to operate under 100% renewable energy by purchasing renewable energy certificates for their portion of electricity use within TPG Telecom. This includes purchasing renewable energy for their share of office electricity and network electricity. Electricity is a major contributor to emissions for felix, by purchasing renewable energy for the office felix was able to avoid 5.37 tCO<sub>2</sub>-e for the office-based activities and 731.38 tCO<sub>2</sub>-e from the network electricity.

## 5. EMISSIONS SUMMARY

### Emissions over time

Emissions since base year		Total tCO <sub>2</sub> -e	Emissions intensity of the functional unit
Base year:	FY 2018–19	55	0.0055
Year 1 (projected):	FY 2020–21	139	0.0055
Year 1:	FY 2020–21	388	0.09
Year 2	FY 2021-22	196	0.0048
Year 3	CY2022	126	0.0026

### Significant changes in emissions

Emission source name	Previous year emissions (t CO <sub>2</sub> -e)	Current year emissions (t CO <sub>2</sub> -e)	Detailed reason for change
Digital advertising	192	112	Emissions only cover 6 months of the year due to this being a bridging report

### Use of Climate Active carbon neutral products, services, buildings or precincts

felix used South Pole as a consultancy to help produce the inventory and product disclosure statement. felix is also headquartered in a Climate Active certified building.

Certified brand name	Product or Service used
South Pole	Consultancy service
177 Pacific Highway, North Sydney	Building

## Emissions summary

Emissions represented here are for six months within to represent the difference of emissions between FY21-22 and CY22

Stage	Actual tCO2-e
Advertising & Promotion	111.63
Business travel	0.08
Employee commuting	2.01
IT equipment	9.13
Natural gas	0.01
Paper and cardboard	0.02
Purchased electricity (including transmission and distribution losses and base building electricity)	0.00
Working from home	2.65
Waste	0.05
Water	0.01
<b>Total Net Emissions</b>	<b>125.59</b>

<b>Emissions intensity per functional unit</b>	0.0026
<b>Number of functional units to be offset</b>	48377
<b>Total emissions to be offset</b>	126

## 6. CARBON OFFSETS

### Offsets retirement approach

This certification has taken an in-arrears offsetting approach. The total emission to offset is 126 t CO<sub>2</sub>-e. The total number of eligible offsets used in this report is 126. Of the total eligible offsets used, 0 were previously banked and 126 were newly purchased and retired. 12 are remaining and have been banked for future use.

## Eligible offsets retirement summary

Offsets retired 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 retired (tCO <sub>2</sub> -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 (%)
Southern Cardamom REDD+ Project	VCU	Verra	24 May 2023	<a href="#">6829-349019471-349021039-VCU-006-MER-KH-14-1748-01012015-31122015-1</a>	2015		1,569	1,431*	12	126	100%
<b>Total offsets retired this report and used in this report</b>										126	
<b>Total offsets retired this report and banked for future reports</b>									12		
Type of offset units		Eligible quantity (used for this reporting period)					Percentage of total				
Verified Carbon Units (VCUs)		126					100%				

\* 1,431 credits were used for the product certifications for felix mobile

## 7. RENEWABLE ENERGY CERTIFICATE (REC) SUMMARY

### Renewable Energy Certificate (REC) Summary

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

1. Large-scale Generation certificates (LGCs)*				13 <sup>1</sup>					
Project supported by LGC purchase	Project location	Eligible unit type	Registry	Surrender date	Accreditation code	Certificate serial number	Generation year	Fuel source	Quantity (MWh)
Ecovantage Pty Ltd	QLD, Australia	LGC	REC Registry	09 June 2023	SRPVQLO2	288-508	2021	Solar	221
Ecovantage Pty Ltd	WA, Australia	LGC	REC Registry	09 June 2023	SRPVWAE4	389-442	2022	Solar	54
Ecovantage Pty Ltd	Vic, Australia	LGC	REC Registry	09 June 2023	SRPVVCM3	581-598	2022	Solar	18
Ecovantage Pty Ltd	SA, Australia	LGC	REC Registry	09 June 2023	SRPVSAA1	4,636-5,194	2022	Solar	559
Ecovantage Pty Ltd	QLD, Australia	LGC	REC Registry	09 June 2023	SRPVQLF2	1232-1400	2022	Solar	169
<b>Total LGCs surrendered this report and used in this report</b>									<b>13</b>

<sup>1</sup> 1,008 MWh are used for the product certification.

## APPENDIX A: ADDITIONAL INFORMATION

NA

## APPENDIX B: ELECTRICITY SUMMARY

There are two international best-practice methods for calculating electricity emissions – the location-based method and the market-based method. Reporting electricity emissions under both methods is called dual reporting.

Dual reporting of electricity emissions is useful, as it provides different perspectives of the emissions associated with a business's electricity usage.

### Location-based method

The location-based method provides a picture of a business's electricity emissions in the context of its location, and the emissions intensity of the electricity grid it relies on. It reflects the average emissions intensity of the electricity grid in the location (State) in which energy consumption occurs. The location-based method does not allow for any claims of renewable electricity from grid-imported electricity usage.

### 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.

For this certification, electricity emissions have been set by using the market-based approach.



Market Based Approach Summary			
Market Based Approach	Activity Data (kWh)	Emissions (kg CO2-e)	Renewable Percentage of total
Behind the meter consumption of electricity generated	0	0	0%
<b>Total non-grid electricity</b>	<b>0</b>	<b>0</b>	<b>0%</b>
LGC Purchased and retired (kWh) (including PPAs)	13,000	0	86%
GreenPower	0	0	0%
Climate Active precinct/building (voluntary renewables)	793	0	5%
Precinct/Building (LRET)	0	0	0%
Precinct/Building jurisdictional renewables (LGCs surrendered)	0	0	0%
Electricity products (voluntary renewables)	0	0	0%
Electricity products (LRET)	0	0	0%
Electricity products jurisdictional renewables (LGCs surrendered)	0	0	0%
Jurisdictional renewables (LGCs surrendered)	0	0	0%
Jurisdictional renewables (LRET) (applied to ACT grid electricity)	0	0	0%
Large Scale Renewable Energy Target (applied to grid electricity only)	2,075	0	14%
Residual Electricity	-768	-734	0%
<b>Total renewable electricity (grid + non grid)</b>	<b>15,869</b>	<b>0</b>	<b>105%</b>
<b>Total grid electricity</b>	<b>15,100</b>	<b>0</b>	<b>105%</b>
<b>Total electricity (grid + non grid)</b>	<b>15,100</b>	<b>0</b>	<b>105%</b>
Percentage of residual electricity consumption under operational control	100%		
<b>Residual electricity consumption under operational control</b>	<b>-768</b>	<b>-734</b>	
Scope 2	-678	-648	
Scope 3 (includes T&D emissions from consumption under operational control)	-90	-86	
<b>Residual electricity consumption not under operational control</b>	<b>0</b>	<b>0</b>	
Scope 3	0	0	

<b>Total renewables (grid and non-grid)</b>	<b>105.09%</b>
<b>Mandatory</b>	<b>13.74%</b>
<b>Voluntary</b>	<b>91.34%</b>
<b>Behind the meter</b>	<b>0.00%</b>
<b>Residual scope 2 emissions (t CO2-e)</b>	<b>-0.65</b>
<b>Residual scope 3 emissions (t CO2-e)</b>	<b>-0.09</b>
<b>Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO2-e)</b>	<b>0.00</b>
<b>Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO2-e)</b>	<b>0.00</b>
<b>Total emissions liability (t CO2-e)</b>	<b>0.00</b>

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

Location Based Approach Summary						
Location Based Approach	Activity Data (kWh) total	Under operational control			Not under operational control	
Percentage of grid electricity consumption under operational control	100%	(kWh)	Scope 2 Emissions (kg CO <sub>2</sub> -e)	Scope 3 Emissions (kg CO <sub>2</sub> -e)	(kWh)	Scope 3 Emissions (kg CO <sub>2</sub> -e)
ACT	0	0	0	0	0	0
NSW	9,481	9,481	6,921	569	0	0
SA	0	0	0	0	0	0
VIC	0	0	0	0	0	0
QLD	0	0	0	0	0	0
NT	0	0	0	0	0	0
WA	0	0	0	0	0	0
TAS	5,620	5,620	955	56	0	0
<b>Grid electricity (scope 2 and 3)</b>	<b>15,100</b>	<b>15,100</b>	<b>7,876</b>	<b>625</b>	<b>0</b>	<b>0</b>
ACT	0	0	0	0		
NSW	0	0	0	0		
SA	0	0	0	0		
VIC	0	0	0	0		
QLD	0	0	0	0		
NT	0	0	0	0		
WA	0	0	0	0		
TAS	0	0	0	0		
<b>Non-grid electricity (behind the meter)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>		
<b>Total electricity (grid + non grid)</b>	<b>15,100</b>					

<b>Residual scope 2 emissions (t CO<sub>2</sub>-e)</b>	<b>7.88</b>
<b>Residual scope 3 emissions (t CO<sub>2</sub>-e)</b>	<b>0.63</b>
<b>Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO<sub>2</sub>-e)</b>	<b>4.98</b>
<b>Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO<sub>2</sub>-e)</b>	<b>0.39</b>
<b>Total emissions liability (t CO<sub>2</sub>-e)</b>	<b>5.37</b>

### Operations in Climate Active buildings and precincts

Operations in Climate Active buildings and precincts	Electricity consumed in Climate Active certified building/precinct (kWh)	Emissions (kg CO <sub>2</sub> -e)
177 Pacific Highway, North Sydney, NSW, 2060	3,967	0
<p><i>Climate Active carbon neutral electricity is not renewable electricity. These electricity emissions have been offset by another Climate Active member through their building or precinct certification. This electricity consumption is also included in the market based and location based summary tables. Any electricity that has been sourced as renewable electricity by the building/precinct under the market based method is outlined as such in the market based summary table.</i></p>		

# APPENDIX C: INSIDE EMISSIONS BOUNDARY

## Non-quantified emission sources

The following emissions sources 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	Justification reason
Base building refrigerants	Emissions for refrigerants are deemed to be immaterial

## Excluded emission sources

Attributable emissions sources can be excluded from the carbon inventory, but still considered as part of the emissions boundary if they meet **all three of the below criteria**. An uplift factor may not necessarily be applied.

1. A data gap exists because primary or secondary data cannot be collected (**no actual data**).
2. Extrapolated and proxy data cannot be determined to fill the data gap (**no projected data**).
3. An estimation determines the emissions from the process to be **immaterial**).

## Data management plan for non-quantified sources

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

## 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 other attributable emissions.
2. **Influence** The responsible entity could influence emissions reduction from a particular source.
3. **Risk** The emissions from a particular source contribute to the responsible entity's greenhouse gas risk exposure.
4. **Stakeholders** The emissions from a particular source are deemed relevant by key stakeholders.
5. **Outsourcing** The emissions are from outsourced activities that were previously undertaken by the responsible entity or from outsourced activities that are typically undertaken within the boundary for comparable products or services.

## Non-attributable emissions sources summary

Emission sources tested for relevance	Size	Influence	Risk	Stakeholders	Outsourcing	Justification
<b>Operations of prepaid points of presence where [brand] SIM cards sold (e.g. supermarkets, petrol stations, etc.)</b>	N	N	N	N	N	Sims are sold directly from felix and not sold within supermarkets, petrol stations or any other location. Therefore, there are no emissions from this category that is relevant to the service.



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