



# **PUBLIC DISCLOSURE STATEMENT**

**ACTEWAGL RETAIL PTY LTD**

**PRODUCT CERTIFICATION**

**TRUE-UP: CY2023**


**PROJECTION: CY2024**

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



An Australian Government Initiative



<b>NAME OF CERTIFIED ENTITY</b>	Icon Retail Investments Limited and ActewAGL Retail Pty Ltd
<b>REPORTING PERIOD</b>	True-up: CY23 1 January 2023 – 31 December 2023 Projection: CY24 1 January 2024 – 31 December 2024
<b>DECLARATION</b>	<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>Name of signatory: Rachael Turner  Position of signatory: General Manager, ActewAGL  Retail Date: 6 February 2025</p>



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

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Version: January 2024



# 1.CERTIFICATION SUMMARY

TOTAL EMISSIONS OFFSET	True-up: 3,620 tCO <sub>2</sub> -e Projection: 6,190 tCO <sub>2</sub> -e (projection for CY24)
CARBON OFFSETS USED	24% ACCUs, 76% VERs
RENEWABLE ELECTRICITY	N/A
CARBON ACCOUNT	Prepared by: ERM Australia Consultants Pty Ltd
TECHNICAL ASSESSMENT	20 <sup>th</sup> June 2024 ERM Australia Consultants Pty Ltd Next technical assessment due: CY 2027

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## 2. CERTIFICATION INFORMATION

### Description of product certification

The natural gas product boundary was developed in accordance with the Climate Active Carbon Neutral Standard for Products.

The product lifecycle boundary includes upstream (extraction, production, transmission, and distribution) and downstream (combustion) emissions.

The carbon offset liability of ActewAGL Retail's business operations is treated as zero, as these emissions are covered under the organisation certification (submitted separately). The natural gas product has been developed for residential, small business (SME) and commercial and industrial (C&I) customers who opt in to ActewAGL's certified carbon neutral offering.

The functional unit for ActewAGL's natural gas product is gigajoules (GJ) of natural gas sold to the end consumer.

This Public Disclosure Statement includes the true-up information for CY2023 as well as information for the projected emissions for CY2024.

### Description of business

This carbon neutral certification is for a natural gas product of ActewAGL Retail Pty Ltd, ABN 46 221 314 841. The natural gas product will be offered as an opt-in product to residential, small business (SME) and commercial and industrial (C&I) customers.

## 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.

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

## Emissions boundary for CY2023 (true-up)

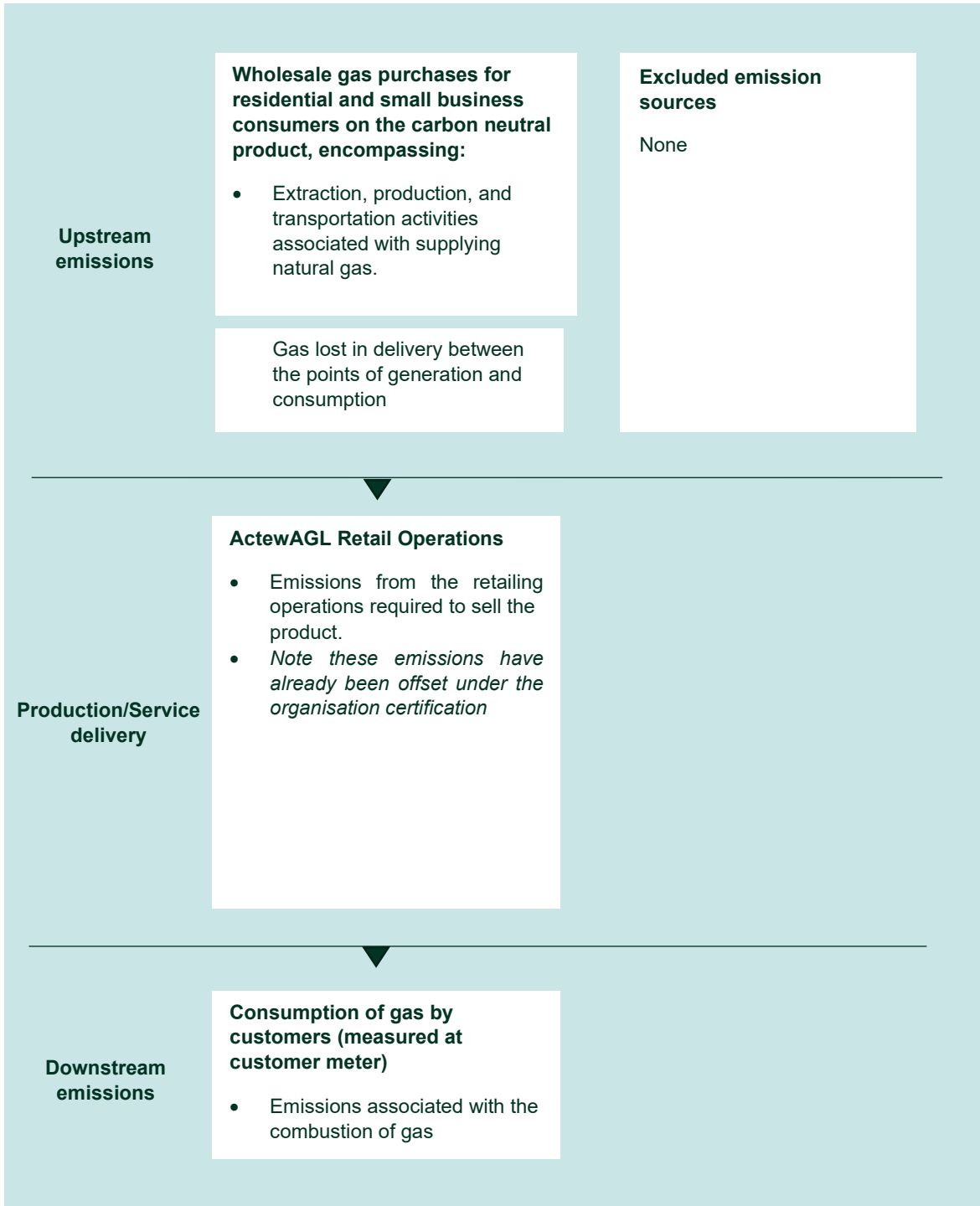
Inside emissions boundary		Outside emission boundary
<b><u>Quantified</u></b>	<b><u>Non-quantified</u></b>	<b><u>Non-attributable</u></b>
Electricity	None	Non-relevant professional services
Paper		Capital goods
ICT services and equipment		Business travel (taxi & rideshare)
Professional Services including advertising and fleet management services		
Postage		
Waste		
Business travel		
Staff commute to work and working from home		
Base building services		
Water/ wastewater		

## **Emissions boundary for CY2024 (projection)**

For the projected CY2024 year, the emissions boundary is the same as the true-up emissions boundary on the prior page).

## Product process diagram for CY2023 (true-up)

The following diagram is Cradle-to-grave.





## Product process diagram for CY2024 (projection)

The projection boundary for CY2024 is consistent with the CY2023 true-up diagram on the prior page.

# 4. EMISSIONS REDUCTIONS

## Emissions reduction strategy

ActewAGL is committed to reducing its greenhouse gas emissions footprint and delivering a more sustainable future. ActewAGL's commitment to reducing emissions and providing responsible energy solutions is demonstrated through existing actions that underpin its Sustainability Strategy, including:

- Customer energy efficiency and appliance upgrade schemes.
- Supporting the transition to zero emissions transport through initiatives to encourage the uptake of Electric Vehicles (EVs).
- Supporting the transition to full electrification – for homes and businesses, through partnerships, and the offering of innovative products, bundles and tailored advice and support.
- Specialised Virtual Power Plan (VPP) offerings for battery customers that help customers harness and increase the benefits of stationary storage.
- Strategic partnerships with key organisations focused on delivering a more sustainable future.
- Emissions reduction roadmap including actions across ActewAGL's own business operations.

As a carbon neutral organisation, ActewAGL recognises the importance of targeting scope 3 (downstream) emissions reductions, addressed through its long-term goals to:

- Remove customer barriers to electrification and support and advocate for energy equity.
- Prioritise sustainability-driven growth at the heart of all products and services.
- Lead in sustainability and enablement of local emissions reductions.

### Sustainability Strategy and Community Goals

In the short-term ActewAGL has established 2025 decarbonisation targets that will strengthen the pathway to achieving longer-term goals. These include:

- Ensuring there are affordable sustainable energy options for all customers.
- Carbon neutral choices for all products and services.
- Enabling the reduction of 200kt tCO<sub>2</sub>-e reductions in the community.

ActewAGL is committed to bringing the ACT and surrounds good energy by offering sustainable energy solutions now and into the future – ActewAGL's '[Sustainability Promise](#)'. This is underpinned by ActewAGL's community goals aimed at achieving:

- 30% of ACT homes to be powered by solar by 2025.
- 1 in 4 ACT households to drive an electric vehicle by 2030.
- Increasing the number of renewable homes by helping customers transition from gas to renewable electricity with a range of products and services designed to make the switch as seamless as possible.

ActewAGL expects organisational emissions to be stable for the 2024 calendar year, considering current year to date emissions and return to work arrangements returning to pre-COVID norms. ActewAGL will

continuously review its overarching Sustainability Strategy and emissions reduction actions to ensure they are technologically innovative, aligned with scientific best practices and providing meaningful, measurable emission reductions for customers and the greater community.

ActewAGL has set short-term organisational emission reduction targets compared to the 2021 baseline, targeting 20% emissions reduction by 2027 and 30% emissions reduction by 2030. Achieved through the below initiatives.

- 100% electric vehicle fleet (where fit-for-purpose) – December 2022
- Implement compost waste facilities – December 2023
- Implement policy to minimise flights and offset (as available) – December 2023
- Only purchase sustainably-sourced merchandise – December 2023
- Implement sustainability assessment for all consultants, contractors and software providers, to preference carbon neutral/sustainable vendors as contracts expire – December 2024
- Implement active transport incentive scheme – December 2025
- Implement policy to reduce all communication to electronic (only using postage as required) – December 2025
- Procure 100% carbon neutral paper and office supplies – December 2026

## **Emissions reduction actions**

Since the last Climate Active submission ActewAGL has undertaken several initiatives to reduce the overall emissions attributable to the carbon neutral gas product. These include initiatives targeting the reduction of downstream emissions through electrification:

- Launched 'Electrify with ActewAGL' to promote and enable home electrification.
- Continued promotion of ActewAGL's Virtual Power Plant (VPP) offerings.
- Partnerships and promotions relevant to solar and battery bundles.
- Continued offering a range of customer supports including energy efficiency rebates and incentives for switching from natural gas to efficient, electric appliances.

Additionally, ActewAGL also introduced several measures to lower its organisational emissions, these include:

- Switched completely to sustainably-sourced merchandise.
- Reduced business travel (e.g., flights, taxis) - instead, opting primarily for virtual engagements.
- Introduction of office composting facilities.

## 5. EMISSIONS SUMMARY

### Emissions over time

Emissions since base year			
		Total tCO <sub>2</sub> -e	Emissions intensity of the functional unit
Base year/Year 1:	CY2021	1.00	65.53 kg CO <sup>2</sup> -e/GJ
Year 2:	CY2022	1020.00	65.53 kg CO <sup>2</sup> -e/GJ
Year 3:	CY2023	3620.00	65.53 kg CO <sup>2</sup> -e/GJ
Year 4:	CY2024	6190.0	65.53 kg CO <sup>2</sup> -e/GJ

### Significant changes in emissions

There was a 255% increase in actual natural gas product emissions from CY2022 to CY2023. This is attributable to ActewAGL's business growth and increased uptake based on residential customer opt-in rates, SME, and C&I customers. The project CY24 increase in emissions is a result of expected sales growth and cumulative impact of existing customers with the opt-in product.

Significant changes in emissions			
Attributable process	Projected emissions (t CO <sub>2</sub> -e)	Actual emissions (t CO <sub>2</sub> -e)	Reason for change
Gas product (upstream, service delivery, and downstream)	4,624.0	3,620.00	Slightly slower uptake at the beginning of CY23, however Gas product increased though to the end of CY23 and is expected to continue increasing during CY24.

### Use of Climate Active carbon neutral products, services, buildings or precincts for CY2023 (true-up)

N/A

## Emissions summary for CY2023 (true-up)

Life cycle stage / Attributable process / Emission source	Projection tCO <sub>2</sub> -e	True-up tCO <sub>2</sub> -e
Upstream emissions	3,636	2,887
Product/Service Delivery <sup>1</sup>	0	0
Downstream emissions	988	733
<b>Attributable emissions (tCO<sub>2</sub>-e)</b>	<b>4,624.0</b>	<b>3,620.0</b>

The previous report was a projection report using representative data to estimate the emissions for the reporting year. This table shows the differences between projected emissions and actual emissions.

Product / Service offset liability	Projection	True-up
Emissions intensity per functional unit	65.53 kg CO <sub>2</sub> -e/GJ	65.53 kg CO <sub>2</sub> -e/GJ
Emissions intensity per functional unit including uplift factors	N/A	N/A
Number of functional units covered by the certification	70,550 GJ	55,240 GJ
<b>Total emissions (projected, tCO<sub>2</sub>-e)</b>	<b>4,624.00</b>	<b>3,619.86</b>
<b>Difference between projected and actual emissions</b>	<b>-1,004.14 tCO<sub>2</sub>-e</b>	

<sup>1</sup> Production/Service delivery emissions are covered by ActewAGL Retail's organisational certification.

## Emissions summary for CY2024 (projected)

The representation of the LCA below is based on a cradle-to-grave approach. No emissions have been included for the Production/Service Delivery stage as ActewAGL's organisational emissions are offset under the organisation certification.

Life cycle stage / Attributable process / Emission source	tCO <sub>2</sub> -e
<b>Attributable emissions (tCO<sub>2</sub>-e)</b>	6,190.00

This table shows the projected emissions summary for the forward reporting period.

Product / Service offset liability	
Emissions intensity per functional unit	65.13 kg CO <sub>2</sub> -e/GJ
Emissions intensity per functional unit including uplift factors	N/A
Number of functional units covered by the certification	94,471 GJ
<b>Total projection emissions (tCO<sub>2</sub>-e) to be offset</b>	<b>5,185.55</b>

## 6. CARBON OFFSETS

### Eligible offsets retirement summary

#### Offsets retired for Climate Active certification

Type of offset units	Eligible quantity (used for this reporting period)	Percentage of total
Australian Carbon Credit Units (ACCUs)	861	24%
Verified Emissions Reductions (VERs)	2,759	76%

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 (%)
Production and dissemination of Ceramic Water Purifiers by Hydrologic, in the Kingdom of Cambodia (GS1020)	VERs	GSR	30 Jul 2021	<a href="#">GS1-1-KH-GS1020-16-2019-20065-35147-38034</a>	2019	-	2,888	2,384	109	395	11%
Mugga Lane Landfill Gas Project (EOP100107)	ACCUs	ANREU	30 Jul 2021	<a href="#">3,750,123,000 – 3,750,126,234</a>	2019-2020	-	1,000	825	38	137	4%
Qori Q'oncha - Improved cookstoves diffusion	VERs	GSR	13 June 2023	<a href="#">GS1-1-PE-GS1049-16-2013-5308-110473-115399</a>	2013	-	4,927	194	618 <sup>2</sup>	2,364	65%

<sup>2</sup> 1,494 units have been used in ActewAGL's organisation certification for CY2023; and the remaining 257 units have been allocated to cover the CY2024 projected emissions for the organisation certification.

program in Peru (GS1049)												
Qori Q'oncha - Improved cookstoves diffusion program in Peru (GS1049)	VERs	GSR	25 June 2024	<u>GS1-1-PE-GS1049-16-2013-5308-115400-120962</u>	2013	-	5,563	0	3,786 <sup>3</sup>	0	-	
Darling River Eco Corridor 3 (ERF 103005)	ACCU	ANREU	13 June 2023	<u>8,327,857,820 – 8,327,859,528</u>	2020-2021	-	1,709	308	239	724 <sup>4</sup>	20%	
Darling River Eco Corridor 9 (ERF103367)	ACCU	ANREU	25 June 2024	<u>8,325,281,347-8,325,281,455</u>	2020-2021	-	1,400	0	1,400	0	-	
<b>Total offsets retired this report and used in this report</b>										3,620		
<b>Total offsets retired this report and banked for future reports</b>										6,190		

<sup>3</sup> The remaining 1,777 units have been allocated to cover the CY2024 projected emissions for the organisation certification.

<sup>4</sup> 438 units have been used in ActewAGL's organisation certification for CY2023.



## Co-benefits

ActewAGL has purchased a mix of carbon offset certificates including Australian Carbon Credit Units (ACCUs) and Gold Standard Verified Emission (GS VER) Units supporting both local and international projects. These certificates were purchased after accounting for ActewAGL's Sustainability Strategy, to offset the remaining emissions. In choosing the projects, ActewAGL has considered its role in supporting both local and global communities and the associated co-benefits of the individual projects. Projects have been selected for their environmental, social and economic benefits to the community and their alignment with the United Nations Sustainable Development Goals (SDGs).

Project	Location	Description
Darling River Eco Corridor 3 and Darling River Eco Corridor 9	New South Wales, Australia	The project establishes permanent native forests through assisted regeneration from in-situ seed sources (including rootstock and lignotubers) on land that was cleared of vegetation and where regrowth was suppressed for at least 10 years prior to the project having commenced. The benefits include increased carbon sequestration, land and native vegetation regeneration, stronger ecosystem and improved livestock and land management.
Mugga Lane Landfill Gas-to-Energy	Australian Capital Territory, Australia	This project encompasses landfill gas capture and processing technology within the ACT - transforming waste into electricity. The gas collected and processed at the Mugga Lane landfill site can power up to 5,700 homes. The facility provides a significant source of renewable energy through the four power generators which have the capacity to produce 37,000 megawatts per year. It is also estimated that the conversion process results in 120,000 tonnes of greenhouse gas abatement per year.
Production and Dissemination of Ceramic Water Purifiers	Cambodia	This project involves the production and distribution of Ceramic Water Purifiers (CWPs) manufactured locally in Cambodia using local skills. By using CWPs, communities reduce indoor and outdoor air pollution from burning wood to boiling water and greenhouse gas emission from typical non-renewable biomass energy usage. It is anticipated the project will provide access to adequate levels of clean drinking water to an estimated 1.7 million people across 312,000 households over seven years.
Cookstove Diffusion Program	Lima, Peru	The project activity is primarily designed for the long-term improvement of the living conditions for local people, occurring through the use of improved stoves in their household. The project activities involved the dissemination and transfer of improved cook-stoves in rural regions of Peru. It is estimated that the project will deliver 45,000 improved cook-stoves.
Burn Stoves Project	Narobi, Kenya	The burn stoves project in Kenya seeks to improve health and incomes throughout Kenya by reducing time and money spent acquiring fuel for household cooking. In order to reach a wide range of Kenyans with the most appropriate technology, the project leverages carbon finance to supports the sale and distribution of stoves to households. Burn Manufacturing has built a factory in Ruiru, north of Nairobi, to make very efficient charcoal burning stoves. The project is estimated to contribute to approximately 900,000 t/CO <sub>2</sub> -e with a crediting period of 7 years.

## 7. RENEWABLE ENERGY CERTIFICATE (REC) SUMMARY

### Renewable Energy Certificate (REC) Summary

NA

# APPENDIX A: ADDITIONAL INFORMATION

## Darling River Eco Corridor 3 Project (ERF103005) – ACCU Registry transaction record

### Transaction Details

Transaction details appear below:

Transaction ID	AU27856
Current Status	Completed (4)
Status Date	13/06/2023 16:57:01 (AEST) 13/06/2023 06:57:01 (GMT)
Transaction Type	Cancellation (4)
Transaction Initiator	Lao, Ly Kheng
Transaction Approver	Merrington, Jane
Comment	These units were cancelled on behalf of ActewAGL Retail to support its carbon neutral claim against the Climate Active Carbon Neutral Standard (Organisation and Product) for the reporting period CY2023

### Transferring Account

Account Number	AU-2680
Account Name	AGL Hydro Partnership
Account Holder	AGL HP1 Pty Limited

### Acquiring Account

Account Number	AU-1068
Account Name	Australia Voluntary Cancellation Account
Account Holder	Commonwealth of Australia

### Transaction Blocks

Party	Type	Transaction Type	Original CP	Current CP	ERF Project ID	NGER Facility ID	NGER Facility Name	Safeguard	Kyoto Project #	Vintage	Expiry Date	Serial Range	Quantity
AU	KACCU	Voluntary ACCU Cancellation			<a href="#">ERF103005</a>					2020-21		8,327,857,820 - 8,327,859,528	1,709

### Transaction Status History

Status Date	Status Code
13/06/2023 16:57:01 (AEST) 13/06/2023 06:57:01 (GMT)	Completed (4)
13/06/2023 16:57:01 (AEST) 13/06/2023 06:57:01 (GMT)	Proposed (1)
13/06/2023 16:57:01 (AEST) 13/06/2023 06:57:01 (GMT)	Account Holder Approved (97)
13/06/2023 16:49:04 (AEST) 13/06/2023 06:49:04 (GMT)	Awaiting Account Holder Approval (95)

## Darling River Eco Corridor 9 Project (ERF103005) – ACCU Registry transaction record

Transaction ID	AU34460
Current Status	Completed (4)
Status Date	25/06/2024 21:44:44 (AEST) 25/06/2024 11:44:44 (GMT)
Transaction Type	Cancellation (4)
Transaction Initiator	Lao, Ly Kheng
Transaction Approver	Merrington, Jane
Comment	These units were cancelled on behalf of ActewAGL Retail to support its carbon neutral claim against the Climate Active Carbon Neutral Standard (Organisation and Product) for the reporting period CY2024

### Transferring Account

Account Number	AU-2680
Account Name	AGL Hydro Partnership
Account Holder	AGL HP1 Pty Limited

### Acquiring Account

Account Number	AU-1068
Account Name	Australia Voluntary Cancellation Account
Account Holder	Commonwealth of Australia

### Transaction Blocks

Party	Type	Transaction Type	Original CP	Current CP	ERF Project ID	NGER Facility ID	NGER Facility Name	Safeguard	Kyoto Project #	Vintage	Expiry Date	Serial Range	Quantity
AU	KACCU	Voluntary ACCU Cancellation			<a href="#">ERF103005</a>					2020-21		8,327,859,529 - 8,327,860,819	1,291
AU	KACCU	Voluntary ACCU Cancellation			<a href="#">ERF103367</a>					2020-21		8,325,281,347 - 8,325,281,455	109

## APPENDIX B: ELECTRICITY SUMMARY

N/A

# 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.

N/A – no non-quantified sources on the emissions boundary.

## 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**.

N/A – no non-attributable (excluded) sources on the emissions boundary.

## 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.

## Excluded emissions sources summary

Emission sources tested for relevance	Size	Influence	Risk	Stakeholders	Outsourcing	Justification
Professional services (Including accounting, banking and legal services)	N	N	N	N	Y	<p><b>Size:</b> The emissions source is likely to be between 50 and 60 t-CO<sub>2</sub>-e, which is not large compared to the total emissions from electricity, stationary energy and fuel emissions.</p> <p><b>Influence:</b> We do not have the potential to influence the emissions from this source, including by shifting to a different lower emissions supplier for our business.</p> <p><b>Risk:</b> There are no relevant laws or regulations that apply to limit emissions specifically from this source, and it is unlikely to be of significant public interest.</p> <p><b>Stakeholders:</b> Key stakeholders are unlikely to consider this a relevant source of emissions for our business.</p> <p><b>Outsourcing:</b> We have not previously undertaken this activity; however comparable organisations may undertake this activity within their boundary.</p>
Capital Goods	N	N	N	Y	N	<p><b>Size:</b> The emissions source is likely to be between 10 and 15 t-CO<sub>2</sub>-e, which is not large compared to the total emissions from electricity, stationary energy and fuel emission.).</p> <p><b>Influence:</b> We do not have the potential to influence the emissions from this source, including by shifting to a different lower emissions supplier for our business.</p> <p><b>Risk:</b> There are no relevant laws or regulations that apply to limit emissions specifically from this source, and it is unlikely to be of significant public interest.</p> <p><b>Stakeholders:</b> Key stakeholders are unlikely to consider this a relevant source of emissions for our business.</p> <p><b>Outsourcing:</b> We have not previously undertaken this activity within our emissions boundary and comparable organisations do not typically undertake this activity within their boundary.</p>
Business travel – Taxi & rideshare	N	N	N	Y	N	<p><b>Size:</b> The emissions source is likely to be between 1 and 5 t-CO<sub>2</sub>-e, which is not large compared to the total emissions from electricity, stationary energy and fuel emissions.</p> <p><b>Influence:</b> We do not have the potential to influence the emissions from this source, including by shifting to a different lower emissions supplier for our business.</p> <p><b>Risk:</b> There are no relevant laws or regulations that apply to limit emissions specifically from this source, and it is unlikely to be of significant public interest.</p> <p><b>Stakeholders:</b> Key stakeholders are likely to consider this a relevant source of emissions for our business.</p> <p><b>Outsourcing:</b> We have not previously undertaken this activity within our emissions boundary and comparable organisations do not typically undertake this activity within their boundary.</p>



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