

PUBLIC DISCLOSURE STATEMENT

STREET FURNITURE AUSTRALIA

ORGANISATION CERTIFICATION TRUE-UP: FY2023–24

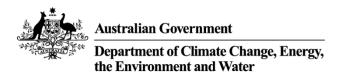
Climate Active Public Disclosure Statement







NAME OF CERTIFIED ENTITY	Street Furniture Australia
REPORTING PERIOD	True-up: 1 July 2023 – 30 June 2024
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.
	Name of signatory Colin Martin Position of signatory Finance Director Date 11/04/2025



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Version 9.

1.CERTIFICATION SUMMARY

TOTAL EMISSIONS OFFSET	True-up: 7,953 tCO ₂ -e
CARBON OFFSETS USED	100% VCUs
RENEWABLE ELECTRICITY	18.72%
CARBON ACCOUNT	Prepared by: Pangolin Associates Pty Ltd
TECHNICAL ASSESSMENT	18/07/2023 Pangolin Associates Next technical assessment due: FY 2026
THIRD PARTY VALIDATION	Type 3 14/12/2023 start2see Pty Ltd

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2. CERTIFICATION INFORMATION

Description of organisation certification

This organisation certification is for the business operations of Street Furniture Australia, ABN 46 070 910 100. This Public Disclosure Statement includes the true-up information for FY2023-24.

This is a parent certification that shares the same inventory and boundary as the product child certification (Street Furniture Australia Product Certification).

This submission follows an operational control approach. The methods used for collating data, performing calculations, and presenting the carbon account are in accordance with the following standards:

- Climate Active Carbon Neutral Standard for Organisations
- The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
- National Greenhouse and Energy Reporting (Measurement) Determination 2008.

Organisation description

Street Furniture Australia Pty Ltd (ABN: 46 070 910 100) designs and manufactures highly durable furniture for the public realm. The company uniquely runs both an R&D program and factory under one roof in Western Sydney, located at:

N5 & N6 Regents Park Estate, 391 Park Road, Regents Park NSW 2143

Their product offering includes:

- Seats
- Benches
- Tables
- Shade structures
- Bollards
- Litter solutions
- Drinking fountains
- Planter boxes
- Tree Surrounds
- Accessories (e.g ash boxes, seat dividers etc)

Since 1986 they have supplied to more than 30,000 places in Australia and around the globe. Recent projects include the new Google Campus in Washington, Houston Botanic Garden and Long Island Rail Road in New York. All products are made-to-order, finished, quality-controlled and dispatched from the factory floor to ISO standards.

Street Furniture's mission is to bring enjoyment to all those who *create*, *build*, *maintain* and *use* public places. To achieve this, they are committed to:

- Creating spaces that make smiles.
- Caring design that treads lightly on the planet.
- Ensuring public spaces are accessible for everyone.
- Partnerships that help clients to create a sense of place.
- Long-term thinking, so their business and the spaces they help to create endure.

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 relevant and are quantified in the carbon inventory. This may include emissions that are not identified as arising due to the operations of the certified entity, however are **optionally included**.

Non-quantified emissions have been assessed as relevant 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

Excluded emissions are those that have been assessed as not relevant to an organisation's operations and are outside of its emissions boundary or are outside of the scope of the certification. These emissions are not part of the carbon neutral claim. Further detail is available at Appendix D.

Emissions boundary for FY2023-24 (true-up)

Inside emissions boundary

Quantified

- Accommodation and facilities
- Air transport
- Cleaning and Chemicals
- Construction materials and services
- Electricity
- Employee commute
- Food
- ICT services and equipment
- Land and sea transport
- Machinery and vehicles
- Office equipment & supplies
- Postage, courier and freight (including upstream freight of raw materials and downstream transport of sold furniture)
- Products (including the raw materials, product manufacture and packaging – see product process diagram)
- Professional Services
- Refrigerants
- Stationary energy
- Waste
- Water
- Working from home
- End of life treatment of sold products

Non-quantified

N/A

Outside emission boundary

Excluded

Use of the furniture sold by Street Furniture (maintenance and potential energy usage from electronic material)

4. EMISSIONS REDUCTIONS

Emissions reduction strategy

Street Furniture Australia commits to reduce absolute scope 1 and 2 GHG emissions by 42% by 2030, compared to an FY24 base year. We also commit to reduce scope 3 GHG emissions by 15% per \$ of product sold by 2030, compared to an FY24 base year with a focus on reducing the emissions associated with our use of aluminium and steel.

As the bulk of our emissions are scope 3 and outside of our direct control, we will utilise the remainder of our first year of certification to engage deeply with our suppliers and sub-contractors on their climate change mitigation strategies. Based on the outcome of these discussions, a refined emissions reduction strategy will follow in FY25, which may include some adjustments to our scope 3 target.

Scope 1 emissions will be reduced by:

Evaluating the production implications and then preparing a business case to replace our existing
gas fired powder coating oven with an electric powder coating oven by 2030 or earlier. Pending
approval from the board, this will significantly reduce our use of LPG gas. LPG gas accounted for
almost 100% of our stationary fuel use and stationary fuels represented 92.7% of Scope 1
emissions in our FY24 base year.

Scope 2 emissions will be reduced by:

- Transitioning to 50% renewable energy by 2026 and 100% renewable energy by 2030. We will
 achieve this through one, or a combination of the following measures:
 - Investigating new energy suppliers as SFA relocates to new premises in 2026
 - o Purchasing certified Greenpower grid electricity
 - o Installing solar panels on the factory roof at our Regents Park premises.

Scope 3 emissions will be reduced by:

Focusing on our use of Aluminium and Steel which accounted for 76.7% of our scope 3 emissions. Reducing the emissions in this area will largely depend on sectorial decarbonization of the aluminium and steel industry.

Aluminium

Aluminium accounted for 62.4% of our Scope 3 emissions in our FY24 base year. We will reduce the emissions associated with this material by switching to low carbon aluminium where possible. This will involve actively engaging with existing suppliers and scoping out new suppliers where applicable.

Typically low carbon aluminium refers to aluminium with a carbon intensity less than the 'global average'. This could mean the product contains recycled content, but current market products are much more likely to be virgin aluminium produced with a percentage of, or entirely with fossil energy.¹

¹ Low Carbon Aluminium Specification Guide, MECLA

We will also support sectorial decarbonization of the aluminium industry by adopting the following measures suggested by the Materials and Embodied Carbon Leaders' Alliance (MECLA) where possible:

- Supporting suppliers with clear climate change commitments and a decarbonization pathway to support their targets.
- Supporting suppliers who are transparent e.g. have a product-specific Environmental Product Declaration (EPD).
- Nominating Aluminium Stewardship Initiative (ASI) certified aluminium.
- Supporting suppliers who are participating in emissions reduction and research and development activities

In addition to this, we commit to investigating low-carbon alternatives to aluminium battens for use in the future. Aluminium batten extrusions accounted for 55.8% of our aluminium usage in our FY24 base year.

Steel

Steel (SS316, SS304 and mild steel) accounted for 13.0% of our Scope 3 emissions in our FY24 base year.

Currently, the availability of low-carbon steel (made using renewable energy and using recycled steel scrap) is still limited.

The International Energy Agency (IEA) roadmap projects that the broad deployment of breakthrough (steel) technology will accelerate between 2030 and 2050. However, we can expect to see first movers trial and implement first of a kind plants providing increased quantities of low-carbon steel to the market from the mid-2020s.²

Therefore, at present, our efforts will focus on supporting sectorial decarbonization of the steel industry by adopting measures suggested by the Materials and Embodied Carbon Leaders' Alliance (MECLA):

- Supporting suppliers with clear climate change commitments and a decarbonization pathway to support their targets.
- Supporting suppliers who are transparent e.g. have a product-specific Environmental Product Declaration (EPD)
- Specifying steel from suppliers who are certified to a credible stewardship scheme e.g. ResponsibleSteel™
- Supporting suppliers who are participating in emissions reduction and research and development activities e.g. Australian Industry Energy Transitions Initiative / worldsteel StepUp™ Program

In addition to the above we will also

Endeavor to improve the quality of our product related data and therefore, improve the monitoring
and management of our emissions. Measures will include progressively adding weights to all
cast, laser and fabricated component stock listings in our project management software and
obtaining supplier specific emission factors.

² Public Policy Paper: Climate change and the production of iron and steel, World Steel Association, 2021

Business operations

The remainder of our scope 3 emissions are from our business operations. The following actions will be implemented in the next 3-5 years to reduce scope 3 emissions:

- Collaborate with our service suppliers (telecommunications, software, IT, advertising, freight) to
 obtain accurate greenhouse gas emissions totals for the service they supply and encourage them
 to implement an emission reduction strategy.
- Reduce business flights to only necessary travel and shift to lower carbon travel options where possible.

Emissions reduction actions

As of June 2024, SFA has switched to low carbon aluminium for extrusions. It is expected to reduce emissions from the product manufacturing, as aluminium extrusion is a major component of SFA's products emissions profile.

5.EMISSIONS SUMMARY

Emissions over time

	Emissions over time								
		Total tCO ₂ -e (without uplift)	Total tCO ₂ -e (with uplift)						
Projection:	2023-24	6,759.93	6,759.93						
True-up:	2023-24	7,952.51	7,952.51						

Significant changes in emissions for FY2023-24 (true-up)

SFA has seen changes in its material demand and increase in its product sales compared to projections. Whilst some production material needs have increased, such as aluminium and SS-304, some other materials have seen a decrease in supply, such as hardwood, SS-316 and mild steel.

Significant changes in emissions									
Emission source	Projected emissions (t CO ₂ -e)	Actual emissions (t CO ₂ -e)	Reason for change						
Aluminium	3,945.05	4,629.86	Changes to product manufacturing demand						
Metal - SS304	580.92	840.98	Changes to product manufacturing demand						

Use of Climate Active carbon neutral products, services, buildings or precincts for FY2023-24 (true-up)

Certified brand name	Product/Service/Building/Precinct used
Dexus	Regents Park Premises – Base building water
Pangolin Associates	Consulting Services

Emissions summary for FY2023-24 (true-up)

The electricity summary is available in Appendix B. Electricity emissions were calculated using a market-based approach.

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.

	Projection	ion True-up				
Emission category	Total emissions (t CO ₂ -e)	Sum of scope 1 (tCO ₂ -e)	Sum of scope 2 (tCO ₂ -e)	Sum of scope 3 (tCO ₂ -e)	Sum of total emissions (t CO ₂ -e)	
Accommodation and facilities	0.19	0.00	0.00	6.47	6.47	
Cleaning and Chemicals	2.93	0.00	0.00	4.25	4.25	
Construction Materials and Services	25.67	0.00	0.00	0.68	0.68	
Electricity	132.84	0.00	170.28	21.02	191.30	
Food	7.19	0.00	0.00	6.07	6.07	
ICT services and equipment	66.66	0.00	0.00	23.92	23.92	
Machinery and vehicles	0.00	0.00	0.00	29.32	29.32	
Office equipment & supplies	10.13	0.00	0.00	10.25	10.25	
Postage, courier and freight	235.25	0.00	0.00	281.79	281.79	
Products	5659.25	0.00	0.00	6,081.42	6,081.42	
Professional Services	93.96	0.00	0.00	577.92	577.92	
Refrigerants	20.19	9.72	0.00	0.00	9.72	
Stationary Energy (gaseous fuels)	0.01	0.01	0.00	0.00	0.01	
Stationary Energy (liquid fuels)	343.49	338.09	0.00	112.70	450.79	
Transport (Air)	10.28	0.00	0.00	81.27	81.27	
Transport (Land and Sea)	77.85	17.09	0.00	90.67	107.76	
Waste	60.01	0.00	0.00	83.29	83.29	
Water	5.67	0.00	0.00	0.00	0.00	
Working from home	8.35	0.00	0.00	6.29	6.29	
Total projection emissions (tCO ₂ -e)	6,759.93					
Total true-up emissions (tCO ₂ -e)		364.91	170.28	7,417.32	7,952.51	
Difference between projected and actual emissions		1	,192.58 tCO	2 -e		

Uplift factors for FY2023-24

N/A

6.CARBON OFFSETS

Eligible offsets retirement summary

Street Furniture Australia's Organisation and Product certifications share the same inventory boundary (100% overlap in emissions). All offsets shown hereafter cover both Organisation and Product certifications.

Offsets retired for Climate Active certification

Type of offset unit	Quantity used for this reporting period	Percentage of total units used
Verified Carbon Units (VCUs)	7,953	100.00%

|--|

Bundled Solar Power Project by Solararise India Projects PVT. LTD.	VCU	Verra Registry	18/12/2023	10730- 245042601- 245045980-VCS- VCU-997-VER- IN-1-1762- 26042018- 31122018-0	2018	3380	0	0	3380	42.50%
Rimba Raya Biodiversity Reserve Project	VCU	Verra Registry	18/12/2023	9900- 157311091- 157312751-VCS- VCU-263-VER- ID-14-674- 01012018- 31122018-1	2018	1661	0	0	1661	20.89%
Rimba Raya Biodiversity Reserve Project	VCU	Verra Registry	18/12/2023	9900- 157286892- 157287591-VCS- VCU-263-VER- ID-14-674- 01012018- 31122018-1	2018	700	0	0	700	8.80%
Rimba Raya Biodiversity Reserve Project	VCU	Verra Registry	18/12/2023	9900- 157309891- 157310390-VCS- VCU-263-VER- ID-14-674- 01012018- 31122018-1	2018	500	0	0	500	6.29%
Rimba Raya Biodiversity Reserve Project	VCU	Verra Registry	18/12/2023	9900- 157286392- 157286642-VCS- VCU-263-VER- ID-14-674- 01012018- 31122018-1	2018	251	0	0	251	3.16%

Rimba Raya Biodiversity Reserve Project	VCU	Verra Registry	18/12/2023	9900- 157286643- 157286891-VCS- VCU-263-VER- ID-14-674- 01012018- 31122018-1	2018	249	0	0	249	3.13%
Rimba Raya Biodiversity Reserve Project	VCU	Verra Registry	18/12/2023	9900- 157229542- 157229560-VCS- VCU-263-VER- ID-14-674- 01012018- 31122018-1	2018	19	0	0	19	0.24%
Bundled Solar Power Project by Solararise India Projects PVT. LTD.	VCU	Verra Registry	26/11/2024	10730- 245107918- 245108514-VCS- VCU-997-VER- IN-1-1762- 26042018- 31122018-0	2018	597	0	0	597	7.51%
Rimba Raya Biodiversity Reserve Project	VCU	Verra Registry	26/11/2024	9900- 157303562- 157304061-VCS- VCU-263-VER- ID-14-674- 01012018- 31122018-1	2018	500	0	0	500	6.29%
Rimba Raya Biodiversity Reserve Project	VCU	Verra Registry	26/11/2024	9900- 157295688- 157295783-VCS- VCU-263-VER- ID-14-674- 01012018- 31122018-1	2018	96	0	0	96	1.21%

Co-benefits

The Rimba Raya REDD+ project has successfully defended 64,500 hectares of carbon and biodiversity-rich lowland peat forest from conversion to oil palm plantations, which surround the project area and adjacent Tanjung Putting National Park. Rimba Raya protects over 120 threatened and endangered species in the project area including the endangered Borneo Orangutan and supports over 10,000 forest-dependent community members living in and along the boundaries of the project, who have traditionally held no tenure and who have used the forest in an unsustainable way.

7. RENEWABLE ENERGY CERTIFICATE (REC) SUMMARY

Renewable Energy Certificate (REC) summary

N/A

APPENDIX A: ADDITIONAL INFORMATION

N/A

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 the <u>true-up reporting year</u>, electricity emissions have been set by using the **market-based approach**.

Market-based approach	Activity Data (kWh)	Emissions (kg CO₂-e)	Renewable percentage of total
Behind the meter consumption of electricity generated	0	0	0%
Total non-grid electricity	0	0	0%
LGC Purchased and retired (kWh) (including PPAs)	0	0	0%
GreenPower	0	0	0%
Climate Active precinct/building (voluntary renewables)	0	0	0%
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)	48,418	0	19%
Residual Electricity	210,224	191,304	0%
Total renewable electricity (grid + non grid)	48.418	0	19%
Total grid electricity	258,642	191,304	19%
Total electricity (grid + non grid)	258,642	191,304	19%
Percentage of residual electricity consumption under operational control	100%	- ,	
Residual electricity consumption under operational	040.004	404.004	
control	210,224	191,304	
Scope 2	187,123	170,282	
Scope 3 (includes T&D emissions from consumption under operational control)	23,102	21,022	
Residual electricity consumption not under	20,102	۷۱,022	
operational control	0	0	
Scope 3	0	0	

Total renewables (grid and non-grid)	18.72%
Mandatory	18.72%
Voluntary	0.00%
Behind the meter	0.00%
Residual scope 2 emissions (t CO ₂ -e)	170.28
Residual scope 3 emissions (t CO ₂ -e)	21.02
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO ₂ -e)	170.28
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO ₂ -e)	21.02
Total emissions liability (t CO ₂ -e)	191.30
Figures may not sum due to rounding. Renewable percentage can be above 100%	

Location-based approach summary Location-based approach	Activity Data (kWh) total	Data (kWh)			Not under operational control		
Percentage of grid electricity consumption under operational control	100%	(kWh)	Scope 2 Emissions (kgCO ₂ -e)	Scope 3 Emissions (kgCO ₂ -e)	(kWh)	Scope 3 Emissions (kgCO ₂ -e)	
ACT	0	0	0	0	0	0	
NSW	258,642	258,642	175,877	12,932	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	0	0	0	0	0	0	
Grid electricity (scope 2 and 3)	258,642	258,642	175,877	12,932	0	0	
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			
Non-grid electricity (behind the meter)	0	0	0	0			
Total electricity (grid + non grid)	258,642						

Residual scope 2 emissions (t CO ₂ -e)	175.88
Residual scope 3 emissions (t CO²-e)	12.93
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO ₂ -e)	175.88
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO ₂ -e)	12.93
Total emissions liability	188.81

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 ₂ -e)
N/A	0	0
Climate Active carbon neutral electricity is not renewable electricit	v. These electricity emissions have been o	offset by another Climate

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.

Climate Active carbon neutral electricity products

Climate Active carbon neutral product used	Electricity claimed from Climate Active electricity products (kWh)	Emissions (kg CO₂-e)
N/A	0	0

Climate Active carbon neutral electricity is not renewable electricity. These electricity emissions have been offset by another Climate Active member through their electricity product 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 electricity product under the market-based method is outlined as such in the market-based summary table.

APPENDIX C: INSIDE EMISSIONS BOUNDARY

Non-quantified emission sources

The following emissions sources have been assessed as relevant, are captured within the emissions boundary, but are not measured (quantified) in the carbon inventory. They have been non-quantified due to <u>one</u> 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. <u>Data unavailable</u> 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	Justification reason
sources	FY2023-24 True-up emissions boundary
N/A	N/A

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 EMISSIONS BOUNDARY

Excluded emission sources

The below emission sources have been assessed as not relevant to this organisation's operations and are outside of its emissions boundary. These emissions are not part of the carbon neutral claim. Emission sources considered for relevance must be included within the certification boundary if they meet two of the five relevance criteria. Those which only meet one condition of the relevance test can be excluded from the certification boundary.

Emissions tested for relevance are detailed below against each of the following criteria:

- <u>Size</u> The emissions from a particular source are likely to be large relative to the organisation's electricity, stationary energy and fuel emissions.
- 2. <u>Influence</u> The responsible entity has the potential to influence the reduction of emissions from a particular source.
- 3. <u>Risk</u> 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.
- 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.

Excluded emissions sources summary

Emission sources tested for relevance	Size	Influence	Risk	Stakeholders	Outsourcing	Justification FY2023-24 True-up emissions boundary
Use phase of the furniture sold by Street Furniture	N	Y	N	N	N	Size: The furniture items require maintenance which would generate emissions during their use phase. The potential source of energy use is electricity usage from the electronic item used in some of the furniture sold (only 2 products sold have electronic items embedded and represent 0.2% of total products sold. The estimated electricity consumption from those items would be responsible for less than 0.2% of total emissions). Timber furniture requires regular maintenance (oiling) and steel/ aluminium furniture may require re-powder coating. However those activities would generate emissions that are immaterial compared to the manufacturing embodied emissions of the furniture. They are also out of direct control from Street Furniture and would vary from one customer to another and form the different usage of the sold product. Influence: Street Furniture Australia does have the potential to influence the emissions from this source through the design of its products. Risk: There are no relevant laws or regulations that apply to limit emissions specifically from this source, the source does not create supply chain risks, and it is unlikely to be of significant public interest. Stakeholders: Key stakeholders, including the public, are unlikely to consider this a relevant source of emissions for our product/service, for which most of the emissions are defined at the design stage in the choice of materials we use. Outsourcing: We have not previously undertaken this activity within our emissions boundary and comparable products/services do not typically undertake this activity within their boundary.



