



PUBLIC DISCLOSURE STATEMENT

LA TROBE UNIVERSITY – ALBURY-
WODONGA CAMPUS

PRECINCT CERTIFICATION
CY2024

Australian Government

Climate Active Public Disclosure Statement



An Australian Government Initiative



NAME OF CERTIFIED ENTITY	La Trobe University – Albury-Wodonga Campus
REPORTING PERIOD	Calendar year 1 January 2024 – 31 December 2024 Arrears report
DECLARATION	<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>
	



Australian Government

Department of Climate Change, Energy, the Environment and Water

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Version 9.1.



1. CERTIFICATION SUMMARY

TOTAL EMISSIONS OFFSET	2011.89 tCO ₂ -e
CARBON OFFSETS USED	100% VCUs
RENEWABLE ELECTRICITY	34.76%
CARBON ACCOUNT	Prepared by: Name: Xiao Yan Li Organisation: La Trobe University Date: 29/03/2025
TECHNICAL ASSESSMENT	Date: 18/08/2022 Name: Jessica Antunes Organisation: ERM Energetics Next technical assessment due: CY 2025 report

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2. CERTIFICATION INFORMATION

Description of precinct certification

This precinct certification is for the La Trobe University, Albury-Wodonga Campus.

The responsible entity for this precinct certification is La Trobe University Albury-Wodonga campus, ABN 64 804 735 113.

This Public Disclosure Statement includes information for CY2024 reporting period.

Precinct geographical boundary

La Trobe University has committed to being at the forefront of addressing key global issues. As such, social and environmental sustainability is embedded into its operations, curriculum and research.

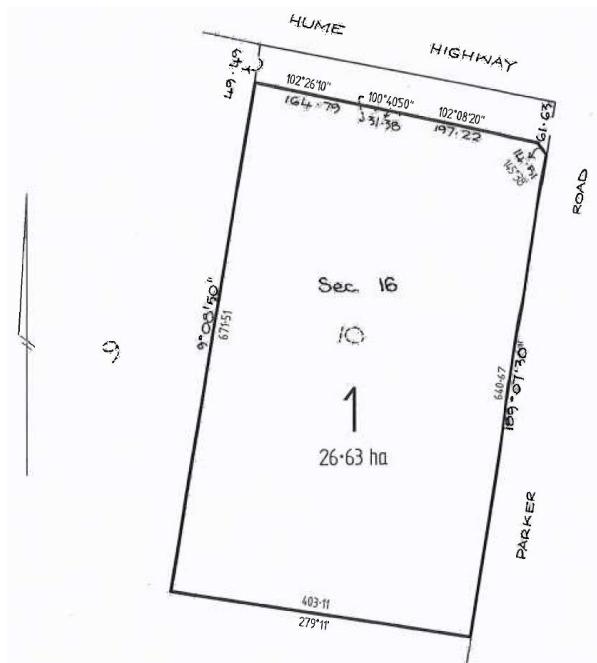
Aligned with its sustainable practices, the University has set a target to become carbon neutral by 2029 and make the regional campuses carbon neutral by 2022.

The Albury-Wodonga campus was established in 1991 and plays a vital role in helping the local community to thrive. The campus provides the region with world-class education that is delivered locally. As the leading provider of higher education across northern Victoria, La Trobe supports the Albury-Wodonga Regional Deal and has been working with governments, the community and industry sectors to finalise and deliver a plan for the region's future growth. We know when students study regionally, they are more likely to stay in regional communities to live and work. We are one of the largest employers in our regional communities, and local communities look to La Trobe for opportunity and growth.

Since inception, the university has continued to invest in infrastructure, adding the Health and Science Building, David Mann Library and the Nancy F Millis Building to the original Michael J Osbourne Building. These spaces accommodate a range of teaching, learning and research facilities, along with the campus café and student common spaces. McFarlane Hill Residences provides accommodation services to those wishing to live on campus. The La Trobe Rural Health School is partly based at our Albury-Wodonga campus, and is the largest rural health school in Australia. It has over 3000 students enrolled across 11 disciplines at our regional campuses of Albury-Wodonga, Bendigo, Mildura and Shepparton.

Research is also integral to the Albury-Wodonga campus. Home to two University Research Centres – the Centre for Freshwater Ecosystems, and the John Richards Centre for Rural Aging Research – La Trobe Albury-Wodonga is also the third-largest research centre per capita in Australia.

The precinct is located at 133 McKoy Street, Wodonga. The geographic boundaries are illustrated in Figure 1 and Figure 2, aligned with the property title and community expectations. The total Usable Floor Area (UFA) is approximately 8,473.53 m², including on-site student accommodation.

Figure 1: Approximate geographic boundaries of the Albury-Wodonga Campus Precinct¹**Figure 2: Property title of Albury-Wodonga Campus Precinct²**¹ Source: Map of Albury-Wodonga Campus exported from Google Earth Pro² Source: Property title of Albury-Wodonga Campus provided by La Trobe University

3. EMISSIONS BOUNDARY

Inside the emissions boundary

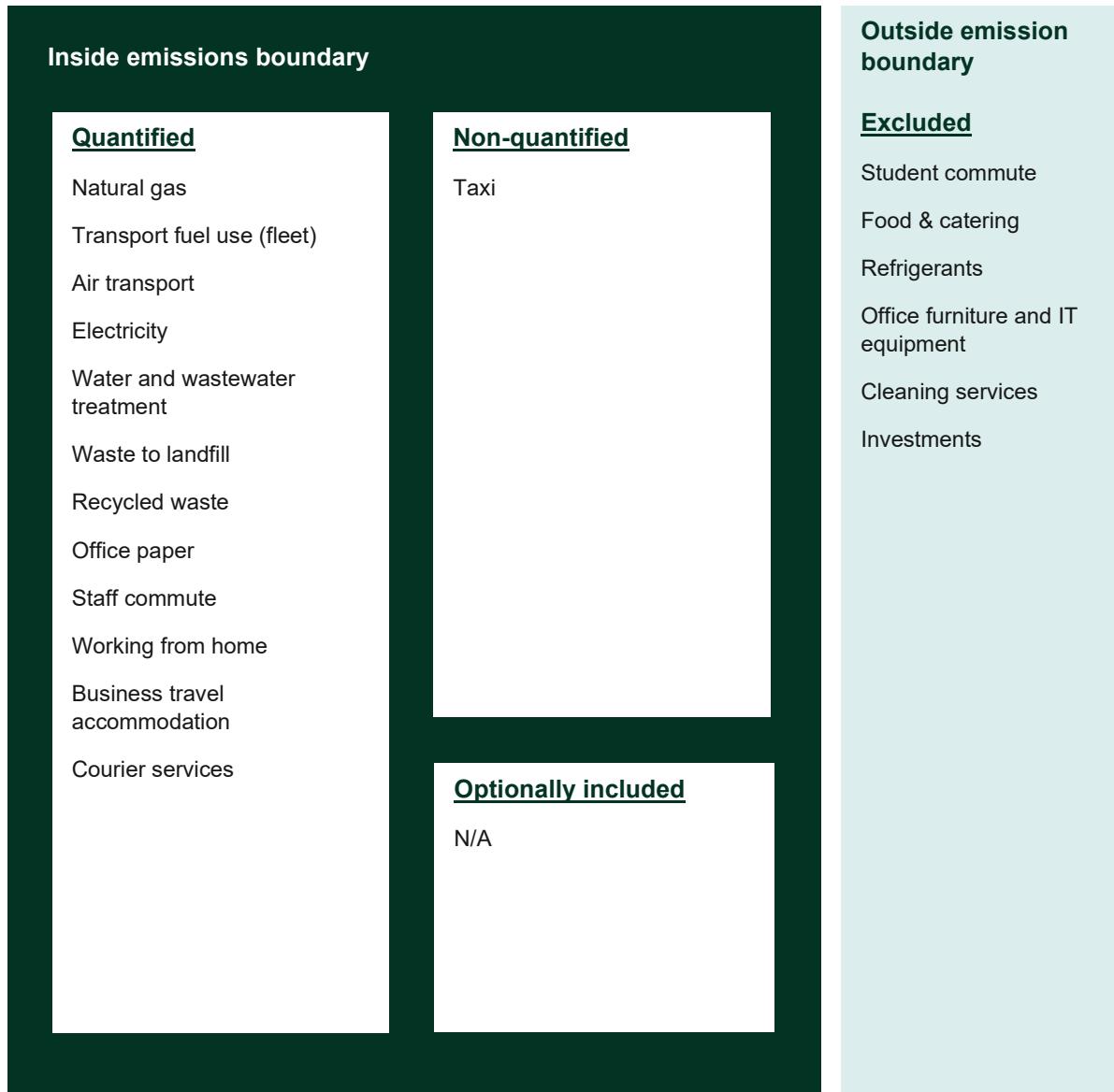
All emission sources listed in the emissions boundary are part of the carbon neutral claim.

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 a precinct'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.



4. EMISSIONS REDUCTIONS

Emissions reduction strategy

In 2019, La Trobe University made the ambitious commitment to become carbon neutral by 2029, with its four regional campuses to achieve this target in 2022. As a university with a long and proud history of pursuing sustainable practice, La Trobe recognises the social, environmental and economic importance of reducing its carbon footprint through onsite renewable generation and adopting energy efficient and new technologies.

All four of the University's regional campuses, Mildura, Shepparton, Bendigo and Albury-Wodonga reached net zero carbon emissions and certification with Climate Active. A range of projects have been implemented at these campuses, including the installation of rooftop solar panels, energy efficient LED lights, mechanical system efficiency upgrades, and batteries to store solar energy. These projects have reduced carbon emissions at these campuses by a significant margin.

La Trobe is committed to further projects to reduce emissions and increase onsite renewable generation. These projects will assist La Trobe to meet its forward-looking commitments to:

- La Trobe University commits to reduce Scope 1 and 2 emissions by 100% by 2029, from a 2019 base year
- Increase onsite renewable generation for all campuses combined by 50% by 2025, from a 2019 baseline year.
- Reduce Scope 3 emissions from passenger vehicle fleet by 90% by 2025, from a 2019 baseline year.

For La Trobe, the focus has been on reducing its scope 1 and 2 emissions through investment in onsite renewables generation and energy efficiency projects. La Trobe is also mitigating future impacts by improving its underlying impact through design for new projects – The 6-star Green Star Sports Stadium as an example. La Trobe will continue its investment into green energy purchasing and renewable energy as much as feasibly and economically possible.

To find out more about La Trobe's Net Zero strategy:

<https://www.latrobe.edu.au/sustainability/net-zero>

Emissions reduction actions

In 2024, La Trobe secured a Power Purchasing Agreement with Iberdrola that supplied 100% of Albury-Wodonga Campus' electricity from a renewable source. In 2024, energy intensive HVAC infrastructure was replaced with more efficient HVAC assets.

5. EMISSIONS SUMMARY

Emissions over time

Emissions since base year		
	Total tCO ₂ -e (without uplift)	Total tCO ₂ -e (with uplift)
Base Year / Year 1: 2022	1788.21	N/A
Year 2: 2023	1910.17	N/A
Year 3: 2024	2011.89	N/A

Climate Active carbon neutral products, services, buildings or precincts

N/A.

Emissions summary

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

Emission category	Scope 1 emissions (tCO ₂ -e)	Scope 2 emissions (tCO ₂ -e)	Scope 3 emissions (tCO ₂ -e)	Total emissions (t CO ₂ -e)
Accommodation and facilities	0.00	0.00	12.29	12.29
Cleaning and Chemicals	0.00	0.00	0.00	0.00
Climate Active carbon neutral products and services	0.00	0.00	0.00	0.00
Construction Materials and Services	0.00	0.00	0.00	0.00
Electricity	0.00	1228.92	151.72	1380.64
Food	0.00	0.00	0.00	0.00
Horticulture and Agriculture	0.00	0.00	0.00	0.00
ICT services and equipment	0.00	0.00	0.00	0.00
Machinery and vehicles	0.00	0.00	0.00	0.00
Office equipment & supplies	0.00	0.00	0.61	0.61
Postage, courier and freight	0.00	0.00	0.85	0.85
Products	0.00	0.00	0.00	0.00
Professional Services	0.00	0.00	0.00	0.00
Refrigerants	0.00	0.00	0.00	0.00
Roads and landscape	0.00	0.00	0.00	0.00
Stationary Energy (gaseous fuels)	243.34	0.00	18.89	262.23
Stationary Energy (liquid fuels)	0.00	0.00	0.00	0.00
Stationary Energy (solid fuels)	0.00	0.00	0.00	0.00
Transport (Air)	0.00	0.00	121.79	121.79
Transport (Land and Sea)	27.13	0.00	99.13	126.27
Waste	0.00	0.00	25.31	25.31
Water	0.00	0.00	25.32	25.32
Working from home	0.00	0.00	56.59	56.59
Total emissions (tCO₂-e)	270.48	1228.92	512.48	2011.89

Uplift factors

N/A.

6. CARBON OFFSETS

Eligible offsets retirement summary

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)	2012	100%

Project name	Type of offset unit	Registry	Date retired	Serial number	Vintage	Total quantity retired	Quantity used in previous reporting periods	Quantity banked for future reporting periods	Quantity used for this reporting period	Percentage of total used this reporting period
Bundled Solar Power Project by Solararise Indian Projects PVT. LTD Stapled to Greenfleet Offsets	VCU	Verra Registry	01/04/2025	10731-245156726-245163537-VCS-VCU-997-VER-IN-1-1762-01012020-25082020-0	2020 2024	6812	0	0	514 ³	25.55%

³ Offset serial numbers #245156726 - #245156734 are allocated to the Shepparton Campus CY2024 Arrears Report, offset Serial number #245156735 - #245163023 are allocated to the Bendigo Campus CY2024 Arrears Report. Offset serial numbers #245163024 - #245163537 are allocated to the Albury Wodonga Campus CY2024 Arrears Report.

Bundled Solar Power Project by Solararise Indian Projects PVT. LTD											
Stapled to Greenfleet Offsets	VCU	Verra Registry	01/04/2025	10731- 245167691- 245169378-VCS- VCU-997-VER- IN-1-1762- 01012020- 25082020-0	2020	1688	0	190	1498 ⁴	74.45%	
Offset Totals:											
8500 0 190 2012 100.00%											

⁴ Offset serial numbers #245167691 - #245169188 are allocated to the Albury Wodonga Campus CY2024 Arrears Report. Offset serial numbers #245169189 - #245169378 are banked for future reports.

Stapled units summary

The below units have been 'stapled' to eligible Climate Active carbon offset units. Stapled units may represent a beneficial outcome, such as biodiversity protection or improved water quality. These purchases are additional to Climate Active program requirements.

Stapled units and their corresponding scheme or project have not been assessed by Climate Active against the offset integrity principles in the Climate Active Carbon Neutral Standards and are not included in the list of eligible Climate Active carbon offset units (Appendix A of the Standards). Businesses have undertaken their own due diligence when purchasing these stapled units.

Project name	Unit type e.g. biodiversity	Project location	Eligible offset project stapled to	Stapled quantity	Link to project or evidence
Strzelecki Nature Link – Greenfleet Offsets	Biodiversity	South Gippslands, Victoria	Bundled Solar Power Project by Solararise Indian Projects PVT. LTD	6812	https://www.greenfleet.com.au/blogs/forest/territory?pos=1&psq=territoty&ss=e&v=1.0
Strzelecki Nature Link – Greenfleet Offsets	Biodiversity	South Gippslands, Victoria	Bundled Solar Power Project by Solararise Indian Projects PVT. LTD	1688	https://www.greenfleet.com.au/blogs/forest/territory?pos=1&psq=territoty&ss=e&v=1.0

Offsets retirement approach

This certification has taken an in-arrears offsetting approach. The total emissions to offset is 2011.89 t CO₂-e. The total number of eligible offsets purchased for the Bundled Solar Power Project were 8500, in this report 2012 have been used. Of the eligible offsets used in the Bundled Solar Power Project, 9 were used for the Shepparton Campus, 6289 were used for the Bendigo Campus. There are 190 remaining units in the Bundled Solar Power Project banked for future reports.

Co-benefits

For CY2024 arrears report, La Trobe University purchased offsets for the Bundled Solar Power Project.

The Bundled Solar Power Project in India generates clean energy through renewable solar. The project involves installation of 120 MW solar project. Over the 10 years of first crediting period, the project will replace anthropogenic emissions of greenhouse gases. La Trobe University has retired 8,500 credits for the Bundled Solar Power Project, all of which have been stapled to the Greenfleet Strzelecki Nature link revegetation project.

7. RENEWABLE ENERGY CERTIFICATE (REC) SUMMARY

Renewable Energy Certificate (REC) summary

N/A.

APPENDIX A: ADDITIONAL INFORMATION

Greenfleet Offsets

La Trobe University has purchased one Greenfleet offset to accompany every VCU purchased from the Bundled Solar Power Project. For each Greenfleet offset purchased, Greenfleet will plant enough native trees to capture 1 tonne CO2-e.

Greenfleet is revegetating native ecosystem on 4 properties in South Gippsland, named the Strzelecki Nature Link. Once restored, the area will form a 3.5 kilometer stretch of continuous koala habitat with locally native tree species. The project will remove carbon and ensure safe passage for wildlife.

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 CO ₂ -e)	Renewable percentage of total
Behind the meter consumption of electricity generated	593,156	0	26%
Total non-grid electricity	593,156	0	26%
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)	215,174	0	9%
Residual Electricity	1,517,188	1,380,641	0%
Total renewable electricity (grid + non grid)	808,330	0	35%
Total grid electricity	1,732,362	1,380,641	9%
Total electricity (grid + non grid)	2,325,518	1,380,641	35%
Percentage of residual electricity consumption under operational control	100%		
Residual electricity consumption under operational control	1,517,188	1,380,641	
Scope 2	1,350,464	1,228,922	
Scope 3 (includes T&D emissions from consumption under operational control)	166,724	151,719	
Residual electricity consumption not under operational control	0	0	
Scope 3	0	0	

Total renewables (grid and non-grid)	34.76%
Mandatory	9.25%
Voluntary	0.00%
Behind the meter	25.51%
Residual scope 2 emissions (t CO₂-e)	1,228.92
Residual scope 3 emissions (t CO₂-e)	151.72
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO₂-e)	1,228.92
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO₂-e)	151.72
Total emissions liability (t CO₂-e)	1,380.64

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	
		(kWh)	Scope 2 Emissions (kgCO ₂ -e)	Scope 3 Emissions (kgCO ₂ -e)	(kWh)	Scope 3 Emissions (kgCO ₂ -e)
Percentage of grid electricity consumption under operational control	100%					
ACT	0	0	0	0	0	0
NSW	0	0	0	0	0	0
SA	0	0	0	0	0	0
VIC	1,732,362	1,732,362	1,368,566	121,265	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)	1,732,362	1,732,362	1,368,566	121,265	0	0
ACT	0	0	0	0		
NSW	0	0	0	0		
SA	0	0	0	0		
VIC	593,156	593,156	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)	593,156	593,156	0	0		
Total electricity (grid + non grid)	2,325,518					

Residual scope 2 emissions (t CO ₂ -e)	1,368.57
Residual scope 3 emissions (t CO ₂ -e)	121.27
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO ₂ -e)	1,368.57
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO ₂ -e)	121.27
Total emissions liability	1,489.83

If your organisation does not use any Climate Active buildings or precincts, please add N/A to the first row, and delete the remaining empty rows.

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
<p>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.</p>		

Climate Active carbon neutral electricity products

Climate Active carbon neutral electricity product used	Electricity claimed from Climate Active electricity products (kWh)	Emissions (kg CO ₂ -e)
N/A	0	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 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.</i></p>		

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 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.

Taxi

- The emissions associated with taxi trips have been non-quantified in line with the provisions of CACNS. The emissions correspond to less than 1% of the total carbon account and are not considered material.

Relevant non-quantified emission sources	Justification reason
Taxi	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 EMISSIONS BOUNDARY

Excluded emission sources

The below emission sources have been assessed as not relevant to this precinct'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:

1. **Size** The emissions from a particular source are likely to be large relative to the precinct'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 precinct'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 precinct's boundary, or from outsourced activities typically undertaken within the boundary for comparable precincts.

Excluded emissions sources summary

Emission sources tested for relevance	Size	Influence	Risk	Stakeholders	Outsourcing	Justification
Student commute	Y	N	N	N	N	<p>Size: La Trobe understand that the emissions from student commute may be substantial and material.</p> <p>Influence: La Trobe does not have the potential influence to mandate students' transportation of commute, or frequency of commute.</p> <p>Risk: There are no relevant laws or regulations that apply to limit emissions specifically from this source, the sources does not create supply chain risk and it is unlikely to be of significant public interest.</p> <p>Stakeholders: Key stakeholders, including the public, are unlikely to consider this a relevant source of emissions for our business.</p> <p>Outsourcing: We have not previously undertaken this activity within our emissions boundary and comparable universities do not typically undertake this activity within their boundary.</p>
Food & catering	N	Y	N	N	N	<p>Size: The emissions from food and catering are unlikely to be material.</p> <p>Influence: La Trobe does have the potential to influence emissions from food and catering through procurement processes.</p> <p>Risk: There are no relevant laws or regulations that apply to limit emissions specifically from this source, the sources does not create supply chain risks and it is unlikely to be of significant public interest.</p> <p>Stakeholders: Key stakeholders, including the public, are unlikely to consider this a relevant source of emissions for our business.</p> <p>Outsourcing: We have not previously undertaken this activity within our emissions boundary and comparable universities do not typically undertake this activity within their boundary.</p>
Refrigerants	N	Y	N	N	N	<p>Size: The emissions from refrigerants are unlikely to be material.</p> <p>Influence: La Trobe will continue to attempt to influence emissions from use of refrigerants through design guidelines.</p> <p>Risk: The University complies with relevant laws and legislations on refrigerants that are acceptable to be used and does not create further emissions risks.</p> <p>Stakeholders: Key stakeholders are unlikely to consider this a relevant source of emissions for our business.</p> <p>Outsourcing: We have not previously undertaken this activity within our emissions boundary.</p>

Emission sources tested for relevance	Size	Influence	Risk	Stakeholders	Outsourcing	Justification
Office and IT equipment	N	Y	N	N	N	<p>Size: The emissions from Office and IT equipment is unlikely to be material.</p> <p>Influence: La Trobe can influence the emissions from office and IT equipment.</p> <p>Risk: There are no relevant laws or regulations that apply to limit emissions specifically from this source, the source does not create supply chain risk and it is unlikely to be of significant public interest.</p> <p>Stakeholders: Key stakeholders, including the public, are unlikely to consider this a relevant source of emissions for our business.</p> <p>Outsourcing: <u>We have not previously undertaken this activity within our emissions boundary.</u></p>
Cleaning services	N	Y	N	N	N	<p>Size: The emissions from cleaning services is unlikely to be material.</p> <p>Influence: La Trobe does have an influence over the procurement of the organisation engage for cleaning services.</p> <p>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.</p> <p>Stakeholders: Key stakeholders are unlikely to consider this a relevant source of emissions for our business</p> <p>Outsourcing: <u>We have not previously undertaken this activity within our emissions boundary and comparable organisations do not typically undertake this activity within their boundary.</u></p>
Investments	N	N	N	Y	N	<p>Size: La Trobe University have an investment policy, which applies a framework in which the university only invest in companies that are equally committed to reducing their own carbon footprint in carbon emissions. Therefore, the materiality of the emissions associated with investments would be insignificant.</p> <p>Influence: La Trobe University have an investment policy, which outlines the responsible investment framework. The framework includes that climate change can impact investment risk and returns, and should be considered when selecting investments, and that investments are only for companies which are equally committed to reducing their carbon emissions footprint. Therefore, LTU has no further influence, on what the third parties of what they can invest in, other than our existing investment policy.</p> <p>Risks: 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.</p> <p>Stakeholders: Investments are deemed a relevant source of emissions by key stakeholders.</p> <p>Outsourcing: <u>We have not previously undertaken this activity within our emissions boundary and comparable organisations do not typically undertake this activity within their boundary.</u></p>



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