



# **PUBLIC DISCLOSURE STATEMENT**

**SUSSEX TAPS PTY LTD (TRADING AS  
SUSSEX TAPS)**

**PRODUCT CERTIFICATION  
FY2024–25**

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

S U S S E X



An Australian Government Initiative



NAME OF CERTIFIED ENTITY	Sussex Taps Pty Ltd
REPORTING PERIOD	Financial year 1 July 2024 – 30 June 2025 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>George Katsanevakis</i></p>
	George Katsanevakis Managing Director Date 05/05/2026



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

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Version 10.

# 1. CERTIFICATION SUMMARY

TOTAL EMISSIONS OFFSET	310 tCO <sub>2</sub> -e
CARBON OFFSETS USED	100% VCUs
RENEWABLE ELECTRICITY	N/A
CARBON ACCOUNT	Prepared by: Anthesis (Australia)
TECHNICAL ASSESSMENT	Date: 21 September 2023 for FY2022-23 Organisation: Anthesis (Australia) Next technical assessment due: FY2025-26
THIRD PARTY VALIDATION	N/A

## Contents

1. Certification summary .....	3
2. Certification information .....	4
3. Emissions boundary .....	5
4. Emissions reductions .....	8
5. Emissions summary .....	10
6. Carbon offsets .....	13
7. Renewable Energy Certificate (REC) summary .....	15
Appendix A: Additional information .....	16
Appendix B: Electricity summary .....	18
Appendix C: Inside emissions boundary .....	19
Appendix D: Outside emission boundary .....	21

## 2. CERTIFICATION INFORMATION

### Description of product certification

The certification includes the manufacturing of Sussex Collections taps (Brass Ship Calibre, Circa, Duet, Scala, Scala Mini, Suba, Voda) for the period 1 July 2024 to 30 June 2025. The emissions inventory in this Public Disclosure Statement has been developed in accordance with the **Climate Active Carbon Neutral Standard for Products**.

A cradle-to-gate approach has been selected as the use and disposal stages of the tapware lifecycle are highly variable. Tapware typically lasts many decades and may only be replaced due to aesthetics rather than disrepair. When tapware is discarded there is a large second-hand market that further increases their life. Being metal, tapware will likely be recycled.

The functional unit is **1 kg of product**.

Carbon neutral products are available to Sussex' customers on a full coverage basis for the Sussex Collections branded tapware (Brass Ship Calibre, Circa, Duet, Scala, Scala Mini, Suba, Voda).

Sussex Taps has quantified emissions within its controlled operations using the operational control approach.

### Description of business

Sussex Taps Pty Ltd (trading as Sussex Taps and ABN 30 071 163 249) manufacture timeless tapware, showers and accessories in Melbourne, Australia. Sussex sources all product components locally, where possible, manufacturing over 400 products in their Melbourne workshop and foundry. Child companies, Aquatect Polishing Pty Ltd (ABN 13 118 351 732), is the metal polishing arm of Sussex Taps and Aura Water (ABN 31 670 831 839) is a 3-in-1 mixer business which provides hot, cold, and filtered pure alkaline water system.

Sussex has a clear vision to make the best products while leaving an Australian-made legacy that creates a sustainable future for our next generation. Sussex is the first carbon neutral tap manufacturer (organisation certification) and produces the first carbon neutral tap products (product certification) in Australia under the Climate Active program. Sussex strives to bridge the gap between manufacturing and sustainability in the hope that others will follow their lead.

## 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**

Consumables  
Electricity – purchased  
Freight – outbound  
Machinery and Equipment  
Motor vehicle expenses  
Polishing, painting, and electroplating  
Product components  
Product packaging  
Raw materials  
Repairs and maintenance  
Stationary energy – LPG  
Stationary energy - natural gas  
Tool replacements  
Transport energy – diesel  
Transport energy – LPG  
Transport energy – petrol  
Waste - co-mingled recycling  
Waste – landfilled  
Water

**Non-quantified**

N/A

**Optionally included**

N/A

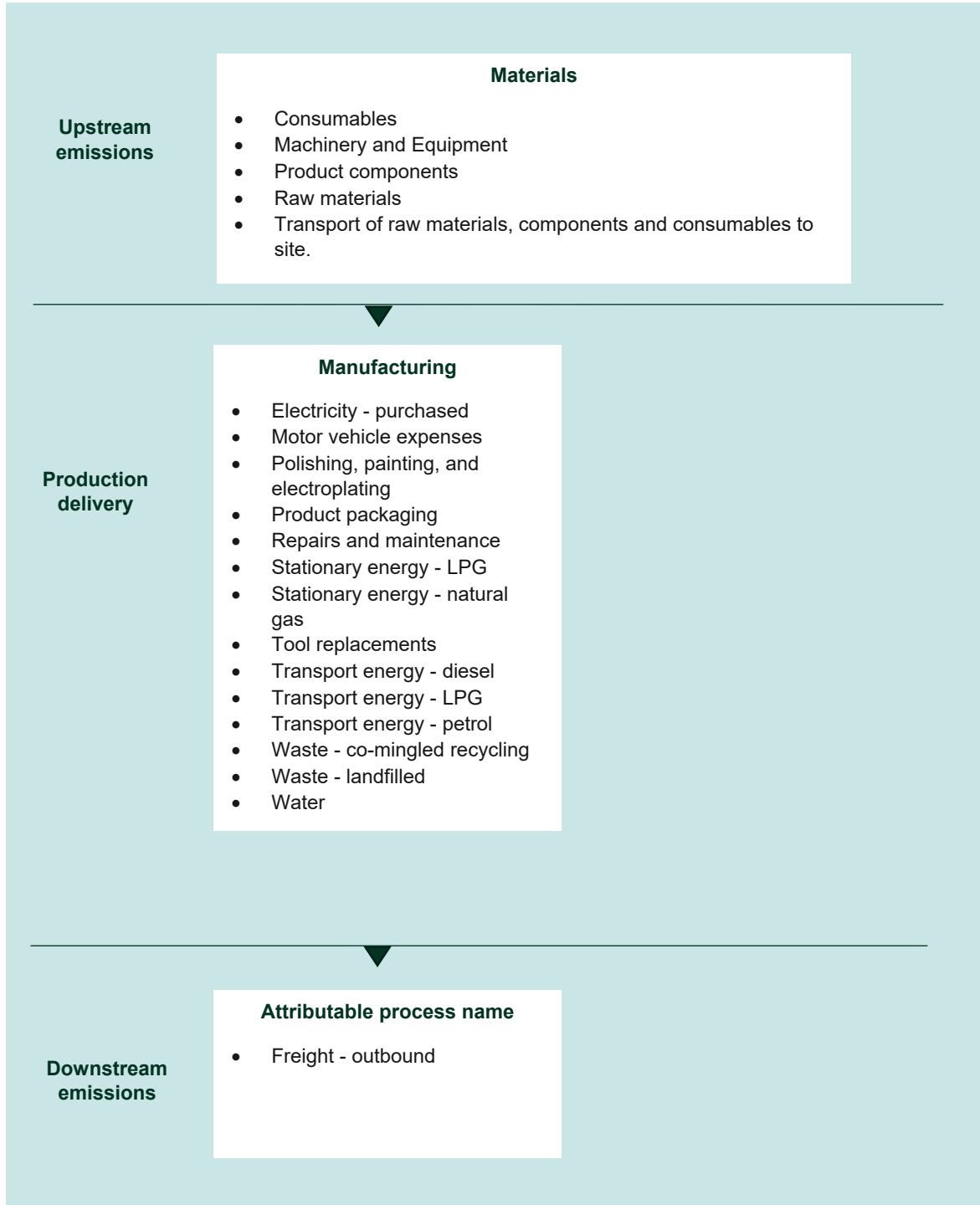
**Outside emission boundary**

**Non-attributable**

Financial services such as banking and insurance  
Education and training  
Subscriptions  
Refrigerant fugitives  
Security

## Product process diagram

Due to the complexity and possible sustainable nature of tapware's end of life, a cradle-to-gate approach was deemed acceptable.



# 4. EMISSIONS REDUCTIONS

## Emissions reduction strategy

Sussex has an unwavering commitment to reducing emissions. This is a central tenant of their interim Emissions Reduction Strategy and has been evidenced by the past completion of many other initiatives.

Sussex's focus is to build a medium-long term Emissions Reduction Strategy that will also educate customers and encourage employees to reduce their environmental impacts at work and at home.

Our emissions hot spots are **electricity, courier & freight, land transport, and professional services**.

Sussex Taps commits to reduce scope 1 and 2 emissions by 25% by 2030, compared to a 2020 base year. The emission reduction strategy for the organisational operations will include the following actions (but are not limited to):

### Scope 1:

- Investigate and continue to purchase more fuel-efficient cars if feasible over the next 5 years.
- Purchase at least one electric or hybrid vehicle
- Continue to move towards reducing emissions in our new vehicles via the use of EV as they become more viable.

### Scope 2:

Sussex Taps will continue to increase energy efficiency by reviewing and adjusting lighting, machinery and appliances, wherever possible to seek renewable energy sources. Sussex's emissions reduction goal for the next two years is 10% less electricity usage per annum by:

- Investigate additional electricity supply arrangements and further opportunities in 2023 to purchase renewable sourced electricity.
- Transition to 100% renewable energy by 2030
- Continue to reduce CNC machines idle times and improve performance
- Continue to minimise compressed air leaks by conducting monthly maintenance of the compressed air system.
- Revisit and review feasibility study to determine viability of an additional 200 kW photovoltaic and battery system for the factory and PVD plant

### Scope 3:

Sussex Taps will focus be on engaging with its suppliers to reduce scope 3 emissions over time, rather than concentrating on scope 1 and 2 emissions alone. Several actions are already in place and are working with our team and external advisers to identify additional opportunities.

- **Goods and Professional Services** emissions will be reduced through:
  - Investigate the market for additional carbon neutral alternatives in our supply chain and procure neutral carbon suppliers by 2025 (e.g., carbon neutral services for Postage, courier and freight)
  - Engage with suppliers and professional services with sustainable practices in their operations, such as renewable energy procurement, ability to opt in to a reduced emissions service, ability to measure and provide emissions data, locally made products and/or zero carbon emissions.

- **Land travel (employee commuting)** emissions will be reduced through:
  - Investigate the adoption of hybrid working principles to support working from home and reduce employee commuting and business travel.
- **Waste emissions** will be reduced through:
  - At the time of its certification, Sussex Taps is the first and only tapware manufacturer certified by Climate Active to reuse all **waste metal materials** and will continue to reuse all brass and find further ways to repurpose other waste.
  - Sussex Taps is working with retail suppliers to improve the sustainability of their product-related waste from packaging through investigating lower footprint options.
  - Sussex Taps commits to carrying out a yearly product analysis to ensure that its waste reduction measures are materially reducing waste year on year. Reviewing the entire production process; from reducing labels, phasing out Styrofoam packaging to printing brochures in-house; in the next two years Sussex's business goals are:
    - 5% less packaging per annum
    - 10% less landfill per annum
    - >85% of all materials recycled per annum
- **Water emissions** will be reduced through:
  - Continue to increase water efficiency by reviewing and adjusting water appliances. Sussex's emissions reduction goal for the next two years is 5% less water usage per annum
- **Travel Air and Accommodation emissions** will be reduced through:
  - Consider the purchasing of carbon-offsets for all our domestic and international flights from 2024.
  - Avoiding non-essential business travel, and encouraging the use of virtual conferencing;
  - Reduction actions for business travel (i.e., accommodation and flights) by choosing options with a lower emissions intensity (e.g., prefer economy class flights and hotel rating decrease) or suppliers with a certified carbon neutral service.

Whilst working through this plan to reduce emissions, we are proactively offsetting our impacts through the purchase of carbon credits.

## Emissions reduction actions

Sussex Taps has implemented the actions listed below to reduce emissions during FY25.

- Implemented a Virtual Energy Network for three photovoltaic system sites.
- Replaced a petrol car with an energy-efficient electric car.
- Annual compressed air maintenance program has reduced compressed air leaks and compressed air energy use by 10%. This led to electricity savings of 5,100 kWh/year.
- Conducted a feasibility study for an additional 200 kW photovoltaic system for the factory and PVD plant.

## 5. EMISSIONS SUMMARY

### Emissions over time

This section compares emissions over time between the base year and current year.

Emissions since base year		Total tCO <sub>2</sub> -e	Emissions intensity of the functional unit
Base year/Year 1:	2019-20	1,054.121	37.59 kg CO <sub>2</sub> -e per kg of Sussex Taps branded tapware
Year 2:	2020-21	964.03	40.26 kg CO <sub>2</sub> -e per kg of Sussex Taps branded tapware
Year 3:	2021-22	703.55	36.96 kg CO <sub>2</sub> -e per kg of Sussex Taps branded tapware FY22 total emissions and emissions intensity has been adjusted with additional raw material (Brass) purchased in FY22
Year 4:	2022-23	431.13	63.30 kg CO <sub>2</sub> -e per kg of Sussex Taps branded tapware
Year 5:	2023-24	588.21	58.34 kg CO <sub>2</sub> -e per kg of Sussex Taps branded tapware
Year 6:	2024-25	783.00	79.96 kg CO <sub>2</sub> -e per kg of Sussex Taps branded tapware

### Significant changes in emissions

Significant (+/- 5%) change in the total emissions and/or the emission intensity are disclosed below:

Significant changes in emissions			
Emission source	Previous year emissions (t CO <sub>2</sub> -e)	Current year emissions (t CO <sub>2</sub> -e)	Reason for change
Fabricated metal products (general)	68.76	104.53	Due to more competitive pricing, there was a 23% increase in plating purchases and 46% increase in purchases from local and overseas suppliers, and outsourced machinery parts.
Electricity (market-based method, scope 2)	206.24	265.81	Total electricity consumed from grid and non-grid increased 7%
Road freight (\$)	66.63	106.60	While there was a 14% increase in operational expenditure in freight services, the increase in emissions may be influenced by changes in the emissions factor
Raw Materials (Brass)	74.89	127.53	There was a 41% increase in brass purchases due to the foundry reduced operating hours.

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

Sussex Taps makes use of the following products and services that are certified as carbon neutral:

Certified brand name	Product/Service/Building/Precinct used
Anthesis (Australia)	Professional Services

## Emissions summary

Emission category	Scope 1 emissions (tCO <sub>2</sub> -e)	Scope 2 emissions (tCO <sub>2</sub> -e)	Scope 3 emissions (tCO <sub>2</sub> -e)	Total emissions (t CO <sub>2</sub> -e)
Cleaning and chemicals	0.00	0.00	8.15	8.15
Construction materials and services	0.00	0.00	104.98	104.98
Electricity	0.00	266.38	36.18	302.56
Machinery and vehicles	0.00	0.00	78.60	78.60
Postage, courier and freight	0.00	0.00	114.11	114.11
Products	0.00	0.00	8.68	8.68
Professional services	0.00	0.00	127.53	127.53
Stationary energy (gaseous fuels)	4.41	0.00	0.34	4.75
Stationary energy (liquid fuels)	0.86	0.00	0.29	1.14
Transport (land and sea)	12.64	0.00	3.28	15.92
Waste	0.00	0.00	15.48	15.48
Water	0.00	0.00	1.09	1.09
<b>Grand Total</b>	<b>17.91</b>	<b>266.38</b>	<b>498.71</b>	<b>783.00</b>
<i>Figures may not sum to total due to rounding.</i>				

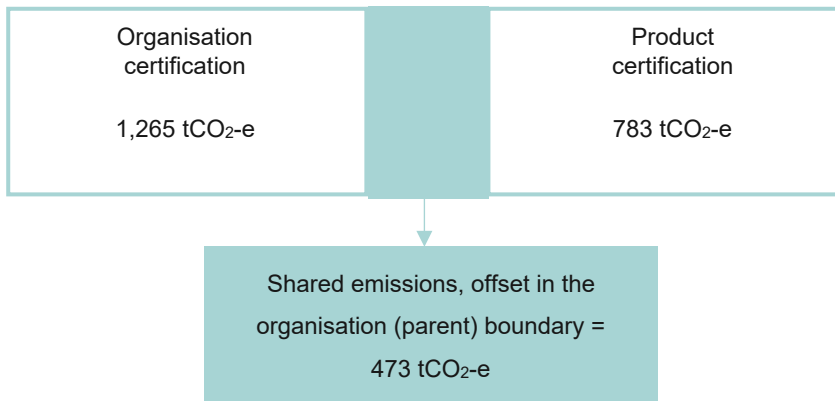
Product offset liability	
Emissions intensity per functional unit	79.96 kg CO <sub>2</sub> -e per kg of Sussex Taps branded tapware
Emissions intensity per functional unit, including uplift factors	N/A
Number of functional units covered by the certification	9,793
<b>Total emissions (tCO<sub>2</sub>-e) to be offset</b>	<b>783</b>

## Uplift factors

No uplift factor was applied.

## Shared emissions between certifications by the same responsible entity

	Emissions (tCO <sub>2</sub> -e)
<b>Total offset liability</b>	$1,265 + 783 - 473 = 1,575 \text{ tCO}_2\text{-e}$
<b>Shared emission offset by organisation</b>	<b>= 473 tCO<sub>2</sub>-e</b>
<b>Offset by product</b>	$783 - 473 = 310 \text{ tCO}_2\text{-e}$



## 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)	310	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
Yaylaköy Wind Power Project, Turkey	VCU	Verra Registry	12/12/2025	<a href="#">11251-305050897-305052496-VCS-VCU-279-VER-TR-1-1232-01012019-31122019-0</a>	2019	1600	1265*	25	310	100%
<b>Offset Totals:</b>						<b>1600</b>	<b>1265</b>	<b>25</b>	<b>310</b>	<b>100%</b>

\*These offsets have been retired to cover the emissions from the FY25 organisation certification

## **Co-benefits**

N/A

## 7. RENEWABLE ENERGY CERTIFICATE (REC) SUMMARY

### Renewable Energy Certificate (REC) Summary

N/A

## APPENDIX A: ADDITIONAL INFORMATION

Our sustainability commitments began in 2013, with a full energy audit and lean manufacturing audit across the business to identify how we could improve year on year.

Since then, the below initiative continued to drive our sustainability agenda:

- 2013:** Waste Audit: identified 89.5 m3 /year waste to landfill
- 2014:** Factory LED lighting upgrade led to 40% in greenhouse gas emissions or 30.7 tonnes/year greenhouse gas savings
- 2015:** 3kW Frigel air cooler installed at foundry site. 90% energy saving costs, improved metal melting rates by 7%. This upgrade has led 33.2 tonnes/year greenhouse gas savings
- Upgraded to energy efficient variable speed drive Nitrogen Generator.
- 2016:** Foundry and polishing plant LED lighting upgrade has led 30 tonnes/year greenhouse gas savings
- Became a member of the Victorian Government Climate Change TAKE 2 Pledge Program to take action on climate change
- 2017:** Power Factor Correction Equipment installed
- 2018:** Installed 100kW of solar panels to reduce factory greenhouse emissions by 131 tonnes or 30% reduction in the sites greenhouse gas emissions
- 2019:** Installation of an energy efficient office heating and cooling system. Reduced energy use and greenhouse gas emissions by at least 15%
- 2020:** In the last year, we have already reduced our greenhouse gas emissions by >30% through the installation of LED energy efficient lighting to our fourth facility, and an additional 170kW of Solar to reduce our emissions by 50%.
- Installation of LED energy efficient lighting to fourth facility. Reduced lighting energy use and greenhouse gas emissions by at least 30%
- 2021:** Installed an additional 100kW of Solar to reduce current greenhouse emissions by 30%
- 2023:** Reduced compressed air energy use by 7700 kWh/year. To support our ongoing sustainability goals, we have achieved recognition and awards in the following categories:
- 2015:** SUSTAINABILITY AND ENVIRONMENTAL AWARD WINNER
- NORTHERN BUSINESS ACHIEVEMENT AWARD FOR EXCELLENCE
- 2017:** CITY OF HUME BUSINESS AWA R D - SUSTAINABILITY CATEGORY (GOLD)

DRIVEN X DESIGN AWARD - SCALA COLLECTION

TAKE2 MEMBER VICTORIAN GOVERNMENT CLIMATE CHANGE PLEDGE PROGRAM

**2018:** HOUSES AWARDS - SUSTAINABILITY SPONSOR

HOUSES AWARDS - ONGOING (2019, 2020, AND BEYOND)

**2019:** CITY OF HUME BUSINESS AWARD - SUSTAINABILITY CATEGORY (FINALIST)

**2020:** APPROVED SUPPLIER TO VICTORIAN GOVERNMENT "BUY RECYCLED DIRECTORY"

APPROVED "AUSTRALIAN MADE AND OWNED" TRADEMARK

DESIGN FILES X LAMINEX

**2022** MANUFACTURER OF THE YEAR WINNER: HUME BUSINESS AWARDS

CIRCULAR ECONOMY FINALIST: HUME BUSINESS AWARDS

**2023** BUSINESS OF THE YEAR: HUME CITY COUNCIL AWARDS

**2023** CIRCULAR ECONOMY WINNER: HUME CITY COUNCIL AWARDS

**2023** MANUFACTURER OF THE YEAR: HUME CITY COUNCIL AWARDS

2024 CIRCULAR ECONOMY FINALIST: HUME BUSINESS AWARDS

2024 MANUFACTURING FINALIST: HUME CITY COUNCIL AWARDS

2024 NORTHERN BUSINESS ACHIEVEMENT AWARD FINALIST

**2025** SUSTAINABILITY HOUSES AWARDS SPONSORSHIP

Sussex has further cemented our commitment to sustainability and environmental, financial and corporate responsibility by getting involved with sustainability-focussed forums. We also support sustainability in our industry through tours, sponsoring awards and partnering with Government groups. These include:

- Speaking at Victorian Manufacturing Showcase
- Speaking at National Manufacturing Week
- Speaking to students at Secondary Schools in Melbourne
- Hosting sustainability Panels
- Sponsoring Sustainability Awards (Houses Awards)
- Factory site tour and presentation for government, students, architect and designers
- Partnering with Sustainability Victoria to develop a YouTube video called "Investing in energy efficiency at Sussex Taps" to promote the benefits of business energy efficiency.

## APPENDIX B: ELECTRICITY SUMMARY

N/A – Emissions from electricity consumption have been captured under the organisation certification.

# 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
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.

## 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 (less than 1% of emissions)**.

Emissions Source	No actual data	No projected data	Immaterial	Justification
N/A				

## APPENDIX D: OUTSIDE EMISSION BOUNDARY

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

1. **Size** The emissions from a particular source are likely to be large relative to 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>Financial services such as banking and insurance</b>	N	N	N	Y	N	<p><b>Size:</b> Immaterial. The emissions source is likely to be less than 1%, 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, the source does not create supply chain risks, and it is unlikely to be of significant public interest.</p> <p><b>Stakeholders:</b> Key stakeholders, including the public, may consider this a relevant source of emissions for businesses.</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>
<b>Education and training</b>	N	N	N	Y	N	<p><b>Size:</b> Immaterial. The emissions source is likely to be less than 1%, 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> The source does not create supply chain risks, and it is unlikely to be of significant public interest.</p> <p><b>Stakeholders:</b> Key stakeholders, including the public may 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 manufacturing organisations do not typically undertake this activity within their boundary.</p>

Emission sources tested for relevance	Size	Influence	Risk	Stakeholder	Outsourcing	Justification
<b>Subscriptions &amp; periodicals</b>	N	N	N	Y	N	<p><b>Size:</b> Immaterial. The emissions source is likely to be less than 1%, 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, the source does not create supply chain risks, and it is unlikely to be of significant public interest.</p> <p><b>Stakeholders:</b> Key stakeholders may 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.</p>
<b>Refrigerant fugitives</b>	N	N	N	Y	N	<p><b>Size:</b> Immaterial. The emissions source is likely to be less than 1%, 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> The source does not create supply chain risks, and it is unlikely to be of significant public interest.</p> <p><b>Stakeholders:</b> Key stakeholders, including the public may 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 manufacturing organisations do not typically undertake this activity within their boundary.</p>
<b>Security</b>	N	N	N	Y	N	<p><b>Size:</b> Immaterial. The emissions source is likely to be less than 1%, 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> The source does not create supply chain risks, and it is unlikely to be of significant public interest.</p> <p><b>Stakeholders:</b> Key stakeholders may 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</p>

## APPENDIX E: OPT-IN PRODUCT ACTION PLAN

N/A



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