PUBLIC DISCLOSURE STATEMENT

SURF COAST SHIRE

ORGANISATION CERTIFICATION
FY2024–25

Australian Government

Climate Active
Public Disclosure Statement

An Australian Government Initiative

NAME OF CERTIFIED ENTITY	Surf Coast Shire
REPORTING PERIOD	1 July 2024 – 30 June 2025 Arrears report
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.* 
	Apanie Wood Manager, Environment & Sustainability 9/6/2026

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

Version 10.

1.CERTIFICATION SUMMARY

TOTAL EMISSIONS OFFSET	30,664 tCO_2-e
CARBON OFFSETS USED	5% ACCUs, 95% VCUs
RENEWABLE ELECTRICITY	100%
CARBON ACCOUNT	Prepared by: Ironbark Sustainability
TECHNICAL ASSESSMENT	19 February 2025 Ironbark Sustainability Next technical assessment due: FY 2026-27 report

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2. CERTIFICATION INFORMATION

Description of organisation certification

This organisation certification is for the corporate operations of Surf Coast Shire, ABN 18 078 461 409. Any reference in this statement to 'Council' is a reference to the certified entity. FY2024-25 is Council's third re-certification year, with FY2021-22 being the first year of certification.

This Public Disclosure Statement includes information for FY2024-25 reporting period.

Organisation description

The Surf Coast Shire (ABN 18 078 461 409) is a Local Government Authority. Council's trading name is Surf Coast Shire, other registered business names include Lorne Visitor Centre, Torquay Visitor Information Centre and the Australian National Surfing Museum.

The Surf Coast Shire is located in the Barwon South West region of Victoria, spanning the Traditional lands of the Wadawurrung People and Eastern Maar People. Covering an area of 1,560 km2 and with a growing permanent population of more than 30,000 people, the Surf Coast Shire region includes the key townships of Torquay, Anglesea, Aireys Inlet, Lorne, Deans Marsh, Moriac and Winchelsea

Council has a strong history of striving to demonstrate environmental leadership as an organisation. In 2019, Council declared a climate emergency. Following this, Council's Climate Emergency Corporate Response Plan 2021-2031 was adopted, including a commitment to continually reduce corporate emissions and offset all residual emissions to become a carbon neutral organisation in 2021-22.

Through its corporate operations, Council operates a variety of facilities and delivers a range of services across the region. Council manages a range of community facilities including recreation centres, childcare centres, kindergartens, community houses, the Anglesea landfill, waste transfer stations, a swimming pool, visitor information centres, and senior citizen centres. Council also manages community infrastructure including the local road network, drains, car parks, bridges, parks and gardens.

The organisation boundary approach taken for this certification considers emissions sources within Surf Coast Council's operational control.

Surf Coast Shire Organisation Chart

Chief Executive Officer

Government Relations and Strategic Projects | Organisation Performance

Strategy and Effectiveness

Finance
- Revenue
- Management Accounting
- Financial Accounting

Integrity and Governance
- Risk and Compliance
- Governance and Council Business
- Procurement
- Legal and Property

People and Culture
- Learning and Development
- Gender Equity, Inclusion & Child Safety
- Human Resources
- Workplace Health and Safety

Technology and Information
- Digital Transformation
- Information Technology
- Records Management

Strategy and Program Delivery
- Project Management
- Corporate Strategy and Benefits Realisation
- Business Improvement

Placemaking and Environment

Assets and Engineering
- Engineering Services and Design
- Road Strategy
- Stormwater Infrastructure
- Asset Management
- Fleet Management

Environment and Sustainability
- Environment
- Climate Action
- Circular Economy
- Waste Management

Planning and Compliance
- Planning Compliance
- Statutory Planning
- Para Planning and Subdivision

Integrated Planning
- Strategic Planning
- Social Infrastructure and Open Space Planning
- Strategic Initiatives/Housing

Economic Development, Arts and Tourism
- Economic Development
- Tourism
- Arts and Creative Economy

Community Life

Operations
- Facilities Management
- Open Space Operations
- Civil Operations

Community Support
- Communications and Community Engagement
- Community Health and Development
- Customer Experience
- Advocacy and Library

Community Safety
- Community Emergency Management
- Ranger Services
- Environmental Health
- Building Services

Community Strengthening
- Aged, Youth and Access
- Early Years
- Stadium Operations Recreation Development
- Community Projects and Partnerships
- Child and Family Health

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.

Inside emissions boundary

Quantified

Accommodation and facilities
Construction Materials and Services
Electricity
Food
Horticulture and Agriculture
ICT services and equipment
Machinery and vehicles
Office equipment and supplies
Postage, courier and freight
Products
Professional Services
Refrigerants
Roads and landscape
Stationary energy (gaseous fuels)
Stationary energy (liquid fuels)
Transport (air)
Transport (Land and Sea)
Waste
Water
Working from home

Non-quantified

Reticulated water use at leased facilities

Outside emission boundary

Excluded

Waste generated in operations – Processing of recycling, organic waste

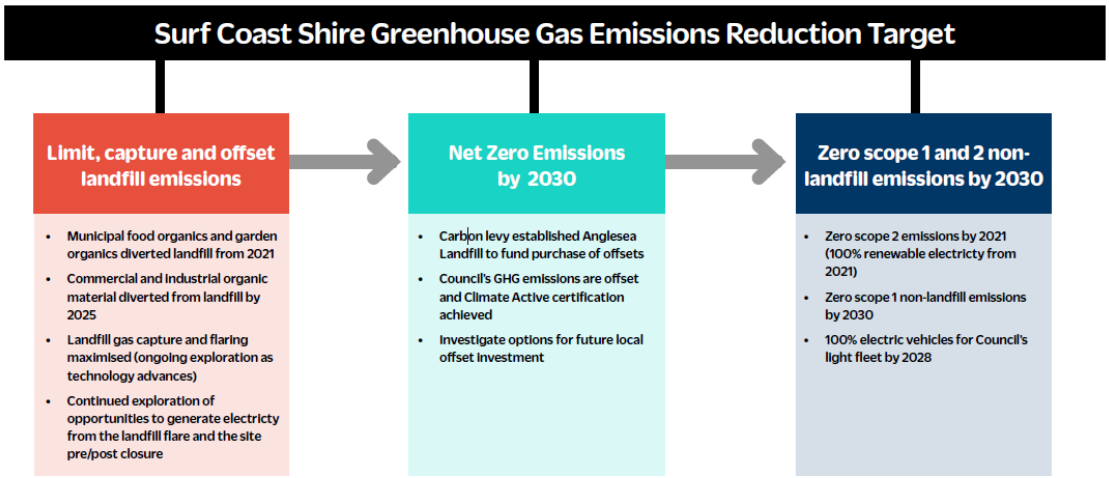
There are no non-quantified sources in the emission boundary that require a data management plan.

4.EMISSIONS REDUCTIONS

Emissions reduction strategy

In April 2022, Surf Coast Shire adopted a corporate emissions reduction target and roadmap. Council's emissions reduction target is zero Scope 1 and 2 as compared to a base year of FY2020-21 corporate greenhouse gas emissions by 2030, excluding emissions from the Anglesea Landfill.[1] While the target is focused on non-landfill emissions, Council has also committed to limit, capture and offset its landfill emissions.

To achieve its target, Council's emissions reduction roadmap ensures that Council does not rely solely on offsetting but outlines a pathway to actively reduce emissions that arise through its operations, as summarised in the diagram below.[2]



[1] The Anglesea Landfill is Council's largest emissions source, accounting for approximately 75% of Council's corporate greenhouse gas emissions in Council's baseline year of 2020-21. Emissions are unable to be eliminated due to existing organic material which will continue to emit legacy emissions for over 20 years. The emissions target is therefore focused on non-landfill scope 1 and 2 emissions sources over which Council has greater operational control.

[2] You can download the full Climate Emergency Corporate Response Plan and progress reports from Council's website: https://www.surfcoast.vic.gov.au/Environment/Climate-Emergency

Emissions reduction actions

Emissions reductions were achieved or progressed through the following initiatives:

- **Anglesea Landfill Transition Strategy**: Progress continues in developing the Anglesea Landfill Transition Strategy, which aims to cease landfilling activities and transition the site into a transfer-focused facility. This shift is expected to reduce landfill-related emissions and improve waste management efficiency.
- **Reduction in Light Fleet Fuel Consumption**: A 28% reduction in fuel consumption was achieved within the light fleet due to a decrease in the total number of vehicles and an ongoing transition to hybrid vehicles. This shift has contributed to lower emissions and improved fuel efficiency across the fleet.
- **Electrification of Largest Gas-Fired HVAC Systems**: Progress continues on plans to electrify Council's largest gas-fired heating, ventilation, and air conditioning (HVAC) system. This initiative is expected to reduce reliance on fossil fuels and decrease overall greenhouse gas emissions.
- **Expansion of EV Charging Infrastructure**: Three of four public-facing dual-port electric vehicle chargers have been installed across the Shire. This infrastructure upgrade supports destination charging and the adoption of EVs within the community.
- **Launch of Travel Buddy**: an online platform to facilitate shared work commutes among staff. By commuting to work together, staff reduce total kilometres travelled and carbon emissions while saving money at the same time.

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:	2021-22	20,370.1	N/A
Year 2:	2022–23	28,987.4	N/A
Year 3:	2023–24	23,882.7	N/A
Year 4:	2024–25	30,664.0	N/A

Significant changes in emissions

Significant changes in emissions			
Emission source	**Previous year emissions** (t CO_2-e)	**Current year emissions** (t CO_2-e)	**Reason for change**
Non-residential building construction and interior finishing	0.00	4600.40	Two major capital works projects were undertaken during FY2024/25 including Stage 1 of the Wurdi Baierr Aquatic and Health Centre (WBARC), https://www.surfcoast.vic.gov.au/About-us/News-and-media/Latest-news/New-aquatic-centre-to-make-an-even-bigger-splash and the Winchelsea Pool Redevelopment, https://www.surfcoast.vic.gov.au/About-us/Works-and-projects/Winchelsea-Moriac-and-surrounds-projects/Winchelsea-Pool-Redevelopment

Use of 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	3.34	3.34
Construction Materials and Services	0.00	0.00	5645.66	5645.66
Electricity	0.00	0.00	0.00	0.00
Food	0.00	0.00	19.50	19.50
Horticulture and Agriculture	0.00	0.00	144.84	144.84
ICT services and equipment	0.00	0.00	291.02	291.02
Machinery and vehicles	0.00	0.00	367.80	367.80
Office equipment & supplies	0.00	0.00	40.46	40.46
Postage, courier and freight	0.00	0.00	34.04	34.04
Products	0.00	0.00	3.80	3.80
Professional Services	0.00	0.00	1648.45	1648.45
Refrigerants	94.61	0.00	0.00	94.61
Roads and landscape	0.00	0.00	975.80	975.80
Stationary Energy (gaseous fuels)	0.00	0.00	0.00	0.00
Stationary Energy (liquid fuels)	100.04	0.00	33.35	133.39
Transport (Air)	0.00	0.00	2.99	2.99
Transport (Land and Sea)	975.68	0.00	568.90	1544.59
Waste	19,604.75	0.00	0.00	19604.75
Water	0.00	0.00	49.56	49.56
Working from home	0.00	0.00	59.33	59.33
Total emissions (tCO_2-e)	**20,775.09**	**0.00**	**9888.87**	**30663.96**
Figures may not sum to total due to rounding.				

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
Australian Carbon Credit Units (ACCUs)	1534	5.00%
Verified Carbon Units (VCUs)	29130	95.00%

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
Tiwi Islands Savanna Burning for Greenhouse Gas Abatement - ERF105045	ACCU	ANREU	26/11/2025	3,800,822,192 - 3,800,823,725	2019-20	1534	0	0	1534	5.00%
Displacement of firewood by household biogas stoves in India	VCU	Verra Registry	24/11/2025	14491-603048384-603052614-VCS-VCU-1289-VER-IN-1-3161-01092020-31122020-0	2020	4231	0	0	4231	13.80%
Displacement of firewood by household biogas stoves in India	VCU	Verra Registry	24/11/2025	14557-608869616-608877650-VCS-VCU-1289-VER-IN-1-3161-01012021-31122021-0	2021	8035	0	0	8035	26.20%

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
Sanya Landfill Gas Power Generation Project	VCU	Verra Registry	24/11/2025	18366-889319734-889336597-VCS-VCU-997-VER-CN-13-2337-01012021-31122021-1	2021	16864	0	0	16864	55.00%
					Offset Totals:	**30664**	**0**	**0**	**30664**	**100.00%**

Co-benefits

Tiwi Islands Savanna Burning for Greenhouse Gas Abatement, Australia

The Tiwi Islands Savanna Burning for Greenhouse Gas Abatement project, located in the Northern Territory, aims to reduce greenhouse gas emissions through the strategic and controlled burning of savanna areas. By conducting planned burns during the early dry season, the project reduces the risk of more intense wildfires later in the season, which would otherwise release larger quantities of CO2. Registered under the Carbon Farming Initiative with the Savanna Fire Management methodology, the project covers an area in the Tiwi Islands Shire and is led by Tiwi Resources Pty Ltd.

Environmental co-benefits:

- GHG Reduction: The project helps mitigate climate change by reducing emissions from uncontrolled wildfires, which are a major source of CO2 in savanna landscapes. By implementing early-season burns, it avoids larger, more intense fires in the late dry season, preventing the release of additional greenhouse gases.
- Biodiversity Conservation: Controlled burning can help maintain the ecological balance of savanna ecosystems, promoting biodiversity by reducing the spread of invasive species and maintaining the health of native vegetation.

Social and economic co-benefits:

- Community Engagement & Employment: The Tiwi Islands Savanna Burning project creates job opportunities for local communities, particularly Indigenous groups, by involving them in the management of land and fire practices. This supports local livelihoods and helps preserve cultural traditions related to land stewardship.
- Economic Development: By engaging in carbon credit through the ERF scheme, the project provides an additional revenue stream for the Tiwi Resources Trust, contributing to sustainable economic growth for the Tiwi Islands.

Displacement of firewood by household biogas stoves in India

The project mitigates environmental degradation by reducing firewood consumption, achieving significant GHG emission reductions and supporting SDG 13 through forest conservation and biodiversity protection.

Environmental benefits:

- Household biogas digesters prevent deforestation in rural India, preserving ecosystems while generating clean energy. The initiative improves local environments by enhancing indoor and ambient air quality, cutting pollution from traditional stoves.
- By converting animal waste into biogas, it reduces methane releases from open dung pits, fostering sustainable waste management.
- Positive stakeholder views underscore its role in biodiversity conservation, with no net harm reported, contributing to healthier ecosystems in rural Telangana and beyond.is a key risk factor for childhood pneumonia as well as many other respiratory diseases and cancer.

Social and economic co-benefits:

- By replacing the wood-fire stoves, pressure on surrounding forests decreases and air quality is significantly improved. This means women and children are less likely to suffer from eye and respiratory illnesses as well as being relieved of the burden of collecting firewood.
- By using the manure from animals, hygiene and sanitation are improved and families spend less money on buying fuel.
- Lastly, a byproduct of the digester is an organic fertiliser, which farmers can use on their fields to replenish the soil.

Sanya Landfill Gas Power Generation Project

The Sanya Landfill Gas Power project, located in Hainan Province, captures harmful methane emissions naturally released from the landfill site, turning it from a toxic waste product into a valuable source of electricity. This simple solution represents a small but important step in China tackling the environmental challenges that come with the country’s rapid development.

Environmental co-benefits:

- This initiative advances social equity by providing a safe, environmentally sound solution to landfill management, minimizing explosion risks and odours that affect nearby residents. Stakeholder support underscores its social desirability, bridging urban waste challenges with rural benefits. It creates stable jobs, boosting income and skills in a developing area, while contributing to China's renewable energy goals. The project's financial viability ensures long-term operations, supporting poverty reduction and inclusive growth.

Social and economic co-benefits:

- This innovative project is an effective way to reduce the cost of low-carbon technologies in China and contributes to the country’s energy mix supplied to the South China Power Grid. The annual power generation is 13,000 MWh and the annual emission reduction average is 80,000 tonnes.

7. RENEWABLE ENERGY CERTIFICATE (REC) SUMMARY

Renewable Energy Certificate (REC) summary

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

1. Large-scale Generation certificates (LGCs)*	1,738

* LGCs in this table only include those surrendered voluntarily, including through PPA arrangements, and do not include LGCs surrendered under the LRET, GreenPower, or jurisdictional renewable schemes.

Project supported by LGC purchase	Project location	Eligible unit type	Registry	Surrender date	Accreditation code	Certificate serial number	Generation year	Fuel source	Quantity (MWh)
Murra Warra Wind Farm Stage 2 - VIC	VIC, Australia	LGC	REC Registry	14 Mar 2025	WD00VC46	338958-339558	2024	Wind	601
Murra Warra Wind Farm Stage 2 - VIC	VIC, Australia	LGC	REC Registry	21 Aug 2025	WD00VC46	64774-65711	2025	Wind	938
								Total LGCs surrendered this report and used in this report	**1,539***

* Surf Coast Shire is purchasing 100% renewable electricity through the Victorian Energy Collaboration (VECO) for all its facilities and streetlights. VECO is a collaborative project between 51 Victorian councils to procure renewable electricity linked to two wind farm projects in Victoria, via a long-term contract with Red Energy for the period 1 July 2021 - 31 December 2030. Through this contract, Large Generation Certificates (LGCs) are surrendered for the first and second half of each calendar year (CY).

Red Energy confirms that it has allocated and surrendered LGCs for 100% of Surf Coast Shire's energy usage, a total of 1,738 LGCs.

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 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 renewable electricity generated	427,050	0	17%
Total non-grid renewable electricity	**427,050**	**0**	**17%**
LGC purchased and retired (kWh) (including PPAs)	1,738,000	0	71%
GreenPower	0	0	0%
Climate Active certified - Precinct/Building (voluntary renewables)	0	0	0%
Climate Active certified - Precinct/Building (LRET)	0	0	0%
Climate Active certified - Precinct/Building jurisdictional renewables (LGCs surrendered)	0	0	0%
Climate Active certified - Electricity products (voluntary renewables)	0	0	0%
Climate Active certified - Electricity products (LRET)	0	0	0%
Climate Active certified - 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)	367,933	0	15%
Residual electricity	-83,769	-77,067	0%
Total renewable electricity (grid + non grid)	**2,532,983**	**0**	**103%**
Total grid electricity	**2,022,164**	**0**	**86%**
Total electricity (grid + non grid)	**2,449,214**	**0**	**103%**
Percentage of residual electricity consumption under operational control	100%		
Residual electricity consumption under operational control	**-83,769**	**-77,067**	
Scope 2	-73,753	-67,853	
Scope 3 (includes T&D emissions from consumption under operational control)	-10,016	-9,215	
Residual electricity consumption not under operational control	**0**	**0**	
Scope 3	0	0	

Total renewables (grid and non-grid)	**103.42%**
Mandatory	**15.02%**
Voluntary	**70.96%**
Behind the meter	**17.44%**
Residual scope 2 emissions (t CO_2-e)	**-67.85**
Residual scope 3 emissions (t CO_2-e)	**-9.21**
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO_2-e)	**0.00**
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO_2-e)	**0.00**
Total emissions liability (t CO_2-e)	**0.00**

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

Location-based approach summary

Location-based approach	Activity Data (kWh) total	Under operational control			Not under operational control	
Percentage of grid electricity consumption under operational control	**100%**	**(kWh)**	**Scope 2 Emissions ($kgCO_2$-e)**	**Scope 3 Emissions ($kgCO_2$-e)**	**(kWh)**	**Scope 3 Emissions ($kgCO_2$-e)**
VIC	2,022,164	2,022,164	1,557,066	181,995	0	0
Grid electricity (scope 2 and 3)	**2,022,164**	**2,022,164**	**1,557,066**	**181,995**	**0**	**0**
VIC	427,050	427,050	0	0		
Non-grid electricity (behind the meter)	**427,050**	**427,050**	**0**	**0**		
Total electricity (grid + non grid)	**2,449,214**					

Residual scope 2 emissions (t CO_2-e)	**1,557.07**
Residual scope 3 emissions (t CO_2-e)	**181.99**
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO_2-e)	**1,557.07**
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO_2-e)	**181.99**
Total emissions liability (t CO_2-e)	**1,739.06**

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.

Relevant non-quantified emission sources	Justification reason
Reticulated water used at leased facilities	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 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:

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

Emission sources tested for relevance	Size	Influence	Risk	Stakeholders	Outsourcing	Justification
Waste generated in operations – Processing of recycling, organic waste	N	Y	N	N	N	**Size:** The emissions source is likely to be less than 1% of Surf Coast Shire Council total emissions, which is not large compared to the total emissions from electricity, stationary energy and fuel emissions. **Influence:** We do have the potential to influence the emissions from this source. **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 business. **Outsourcing:** We have not previously undertaken this activity within our emissions boundary and comparable organisations do not typically undertake this activity within their boundary.

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