



PUBLIC DISCLOSURE STATEMENT

CITY OF SUBIACO

**ORGANISATION CERTIFICATION
FY 2024–25**

Australian Government

Climate Active Public Disclosure Statement



NAME OF CERTIFIED ENTITY	City of Subiaco
REPORTING PERIOD	Financial Year 1 July 2024 – 30 June 2025 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>  Colin Cameron Chief Executive Officer 23 December 2025



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

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Version 10.

1.CERTIFICATION SUMMARY

TOTAL EMISSIONS OFFSET	1,890 tCO ₂ -e
CARBON OFFSETS USED	20% ACCUs, 13.65% CERs, 66.35% VCUs
RENEWABLE ELECTRICITY	78.64%
CARBON ACCOUNT	Prepared by: City of Subiaco
TECHNICAL ASSESSMENT	Next technical assessment due: FY 2025/26

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2. CERTIFICATION INFORMATION

Description of organisation certification

This organisation certification is for the business operations of City of Subiaco, ABN 84 387 702 890. The City of Subiaco does not have any subsidiaries.

The operational boundary has been defined based on an operational control test, in accordance with the principles of the *National Greenhouse and Energy Reporting Act 2007* (NGER Act).

The following locations and facilities included in the City of Subiaco's operational boundary include

- Administration Centres
 - Administration Centre (Bishop Street)
 - Administration Centre (Hay Street)
 - Administration Centre (Rokeby Road)
 - Depot (Bishop Street)
- Community Centres and Facilities
 - Evelyn H Parker Library
 - Lords Recreation Centre
 - Subiaco Community Centre
 - Shenton Park Community Centre
 - Rosalie Park
 - Tom Dadour Community Centre
 - The Palms Community Centre
- Public realm (includes street and public lighting, public toilets, carparking facilities, etc)
- Other public and local open spaces
- Shared facilities.

The methods used for collating data, performing calculations, and presenting the carbon account are consistent with the following standards:

- Climate Active Technical Guidance Manual
- Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
- Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Supplement to the GHG Protocol Corporate Accounting and Reporting Standard)
- *National Greenhouse and Energy Reporting Act 2007*
- *National Greenhouse and Energy Reporting (Measurement) Determination 2008*

Where possible, the calculation methodologies and emission factors used to prepare this inventory were derived from the National Greenhouse Accounts (NGA) Factors (2023) in accordance with 'Method 1' of the *National Greenhouse and Energy Reporting (Measurement) Determination 2008*.

The greenhouse gases captured within the inventory are those commonly reported under the Kyoto Protocol, being:

- Carbon dioxide (CO₂)
- Methane (CH₄)
- Nitrous oxide (N₂O)
- Hydrofluorocarbons (HFCs)
- Perfluorocarbons (PFCs)
- Sulfur hexafluoride (SF₆)
- Nitrogen trifluoride (NF₃)

The quantity of each has been expressed as carbon dioxide equivalent (CO₂-e) by applying the appropriate relative global warming potentials (GWPs).

This Public Disclosure Statement includes information for the FY 2024/25 reporting period.

Organisation description

Established on the traditional lands of the Wadjuk Noongar people, the City of Subiaco (ABN: 84 387 702 890) is an inner-city local government situated within the Perth metropolitan area.

The City of Subiaco covers an area of six square kilometres and is home to over 17,000 residents (see Figure 1). The City comprises the suburbs of Subiaco, Daglish, and parts of Jolimont and Shenton Park, which are some of Perth's most desirable inner-city suburbs, renowned for their quality of lifestyle, cultural interests, and business sector.

The City's operations being certified by Climate Active include 39 community facilities. These include three administration centres, one recreation centre with indoor swimming pool and gym, a library, and various community facilities and public amenities. The certification also considers the operational costs for over \$250 million worth of infrastructure assets such as, but not limited to, City-owned streetlights, carparks, roads, and reserves. In 2024/25, the City had a total operating expenditure of approximately \$54.07 million (provisional figure) and employed 211 permanent staff and 159 casual staff members.

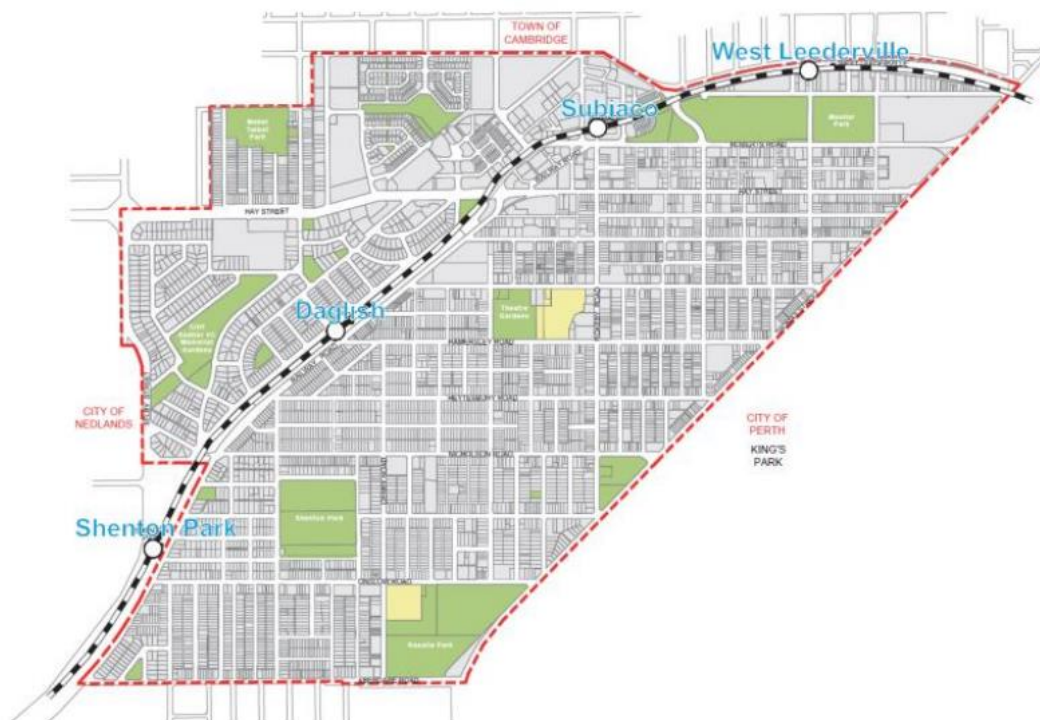


Figure 1. Map of the City of Subiaco.

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.

Council-owned commercial investment properties are excluded from the organizational boundary, in accordance with the relevance test provided in Appendix D. These facilities are outside of the City's operational control, which is defined as the ability to introduce and implement operating policies. Given these facilities are under long-term commercial leases outside of the City's operational control, the City has limited influence over their operation.

The City accounts for the transport fuels associated with municipal waste disposal through Council-managed contractors on behalf of residents and businesses within the local government area. The City does not account for the volume of waste produced by the residents and businesses themselves, as this is not waste generated by Council operations (see Appendix D). The City does, however, account for waste volumes generated and disposed of at City-owned and operated facilities (including community and recreational facilities).

The specific emission sources captured in the City's inventory are outlined below.

Outside emission boundary

Non-quantified

None.

None.

None.

None.

None.

None.

None.

None.

None.

None.

None.

None.

None.

None.

None.

None.

None.

None.

None.

Council-owned commercial investment property (outside of operational boundary).

Council resident waste disposal (outside of operational boundary).

4. EMISSIONS REDUCTIONS

Emissions reduction strategy

The City of Subiaco commits to a 50% reduction in gross emissions by 2030, measured against the revised 2019/20 baseline, as well as a commitment to achieving net zero corporate emissions by 2040. This is consistent with the Science-Based Targets initiative (SBTi) guidance and, as such, is consistent with the Paris Agreement. The City's revised baseline emissions (FY 2019/20) are 3,225.81 t CO₂-e across scopes 1, 2 and 3. The emissions reduction strategy is detailed in the [Corporate Carbon Reduction Plan 2020-2030](#) and the [Climate Change Response Plan](#).

The Climate Change Response Plan revises upon the targets and actions set by the Corporate Carbon Reduction Plan. The revised corporate emissions reduction targets from the Climate Change Response Plan are below:

1. Maintain certification as a carbon neutral organisation annually from 2020–2035.
2. Achieve 100% electrification of all City-owned facilities by 2035 and maintain 100% renewable electricity in all City owned sites (excluding leased properties).
3. Reduce total energy consumption (electricity and natural gas) by 25 percent by 2030, compared to a FY 2018/19 baseline.
4. Reduce fuel consumption from heavy fleet vehicles by 10% by 2030 compared to a FY 2019/20 baseline and maintain an average of 50 g CO₂-e per km or lower for the light fleet.
5. Reduce total corporate emissions by 50% by 2030 compared to a FY2019/20 baseline of 3,225.81 t CO₂-e and achieve net zero corporate emissions by 2040.

Scope 1, 2 & 3 key actions from the CCRP are outlined below:

Scope 1 emissions

- Replace natural gas appliances with suitable electric alternatives within the next three years that can then be powered with renewable electricity.
- Replace conventional vehicles with suitable electric and hybrid alternatives as fleet, ranger, and pool vehicles are due for renewal. The City is aiming to maintain an average of 50 g CO₂-e per km across the light vehicle fleet.
- Undertake a route optimization program for heavy vehicles (waste trucks, street-sweepers, etc) and implement recommendations to reduce diesel consumption whilst exploring opportunities for trialling electric, hybrid, or hydrogen-fuelled alternatives.

Scope 2 emissions

- Target 100% renewable electricity at City facilities by 2025 through a combination of expanding rooftop photovoltaic systems and purchasing renewable electricity.
- Undertake a range of energy efficiency projects including a street lighting upgrade program where globes are systematically replaced with highly efficient LEDs.
- Develop and implement a sustainable design policy for all City-owned buildings, including an energy efficiency target for the building shell.
- Continue to utilise renewable electricity through WALGA's Sustainable Energy Project (SEP) to sign on all remaining Western Power streetlights and non-contestable City Sites onto 100% NaturalPower for 2025-2028.

Scope 3 emissions:

- Implement and expand recycling and composting facilities across City-owned facilities to reduce waste to landfill by 20% by 2030.
- Update the City's Purchasing Policy and Guidelines to strengthen sustainability considerations in tendering.
- Continue to implement the City's Waterwise Council Action Plan and associated irrigation upgrades to reduce water consumption.
- Monitor embodied carbon across at least five capital works projects over a two-year period to identify opportunities for improvement.
- Continue to utilise Green Star certified concrete for all new footpaths.
- Review Work from Home policy to reduce emissions from staff commute.
- Continue to offer a financial Sustainable Transport Allowance to encourage staff to take active and public transport options.

Emissions reduction actions

During the 2024/25 financial year the City undertook a number of actions to reduce emissions. These included:

- **Electricity:** Across the financial year, 79% of the City's purchased electricity was from renewable sources from an Electricity Sales Agreement with Synergy which commenced in 2022. In February 2025, the City agreed to sign on to Phase Two of the contract for three years (April 2025 to March 2028) to procure 100% renewable electricity for City sites. This included signing on all remaining Western Power streetlights and non-contestable sites on to 100% NaturalPower contracts.
- **City Light Fleet:** The City has been progressively replacing the City light fleet with electric alternatives in line with Target 4: Fleet vehicles meet Climate Change Authority's standard by 2025 in the City's Climate Change Response Plan (2020 – 2030) Target 4. The fleet is currently comprised of three hybrid vehicles (11%), 18 electric vehicles (70%), and five petrol vehicles (19%). There has been a 67% decrease in petrol usage across the FY 2024/25 due to the transition of the light fleet to electric vehicles. This has contributed to reducing the emissions from Transport (land and sea) from 615.60 tonnes of CO₂-e (FY 2023/24) to 444.69 tonnes of CO₂-e (FY 2024/25).
- **Stationary Energy (gaseous fuels):** The City has been progressively replacing gas powered equipment and appliances with electric and/or energy-efficient alternatives as they are due for replacement, in accordance with the CCRP. As a result, natural gas consumption reduced from 537.11 GJ during 2023/24 to 372.57 GJ during 2024/25 financial year (30.63% reduction in natural gas emissions).
- **Refrigerant:** During the 24/25 FY the City undertook a review of all refrigerant equipment at all facilities. Since the last review in 2022, equipment has been updated to more energy efficient models, resulting in refrigerant emissions decreasing from 21.10 tonnes of CO₂-e (FY 2023/24) to 14.2 tonnes of CO₂-e (FY 2024/25) which is a 32.27% reduction from the previous FY.

5.EMISSIONS SUMMARY

Emissions over time

Emissions since base year		
	Total tCO ₂ -e (without uplift)	Total tCO ₂ -e (with uplift)
Base Year: 2019-20	2,906.14	3,225.81
Year 1: 2020-21	3,463.43	3,636.60
Year 2: 2021-22	3,715.65	3,715.65
Year 3: 2022-23	2,553.40	2,553.40
Year 4: 2023-24	1,967.14	1,967.14
Year 5: 2024/25	1,889.20	1,889.20

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
Asphalt	262.96	338.45 (28.7% increase)	The increase in the total asphalt laid is considered exceptional considering the scope of works that occurred. Two projects requiring high volumes of asphalt accounted for over a third of the total asphalt laid across the financial year.

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	0.29	0.29
Cleaning and Chemicals	0.00	0.00	1.15	1.15
Construction Materials and Services	0.00	0.00	467.93	467.93
Electricity	0.00	447.42	60.76	508.18
Food	0.00	0.00	10.78	10.78
ICT services and equipment	0.00	0.00	7.69	7.69
Machinery and vehicles	0.00	0.00	0.00	0.00
Office equipment & supplies	0.00	0.00	10.33	10.33
Postage, courier and freight	0.00	0.00	21.67	21.67
Products	0.00	0.00	4.30	4.30
Professional Services	0.00	0.00	40.56	40.56
Refrigerants	14.29	0.00	0.00	14.29
Roads and landscape	0.00	0.00	0.00	0.00
Stationary Energy (gaseous fuels)	19.20	0.00	1.53	20.73
Stationary Energy (solid fuels)	0.00	0.00	0.00	0.00
Stationary Energy (liquid fuels)	0.00	0.00	0.00	0.00
Transport (Air)	0.00	0.00	4.21	4.21
Transport (Land and Sea)	336.68	0.00	294.23	630.91
Waste	0.00	0.00	118.27	118.27
Water	0.00	0.00	25.47	25.47
Working from home	0.00	0.00	2.45	2.45
Total emissions (tCO₂-e)	370.17	447.42	1071.61	1889.20
<i>Figures may not sum to total due to rounding.</i>				

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)	378	20.00%
Certified Emissions Reductions (CERs)	258	13.65%
Verified Carbon Units (VCUs)	1254	66.35%

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
Olkola Ajin – Olkola Fire Project	ACCU	ANREU	22/12/2025	8,342,398,288 – 8,342,398,665	2021-22	378	0	0	378	20.00%
4.5 MW Sechi grid-connected hydro electric project in Himachal Pradesh.	CER	ANREU	22/12/2025	295,545,168 – 295,545,425	CP2	258	0	0	258	13.65%
Renewable Wind Power Project by Axis Wind Farms (Rayalaseema) Pvt. Ltd	VCU	Verra registry	22/12/2025	10728-244913944-244915197-VCS-VCU-1491-VER-IN-1-2052-01012020-31122020-0	2020	1254	0	0	1254	66.35%
Offset Totals:						1890	0	0	1890	100.00%

Co-benefits

Olkola Ajin Savanna Burning Project (Queensland)

This is an Australian carbon offset project located in Queensland and is an Aboriginal owned and managed project. The meticulously planned “cool” fires early in the dry season reduce the fuel load on the ground and prevent larger, hotter fires later in the dry season, thereby reducing greenhouse gas emissions. The project also protects wildlife, enhances fire-dependent ecosystems, and supports the intergenerational continuation of Olkola knowledge and culture.

This offset project also ensures generation of revenue for the Aboriginal community from the sale of Australian Carbon Credit Units (ACCUs) and creates jobs for the local community members in strategic fire management. This is also in line with the City's Reconciliation Action Plan, in particular, the following governance action: Increase Aboriginal and Torres Strait Islander supplier diversity to support improved economic and social outcomes.

This project is one cornerstone of the Healthy Country Plan, which was designed by the Olkola People to support their community, traditional land and culture, where the Plan aims to address 10 of the 17 Sustainable Development Goals by the United Nations.



Wilyun Pools Project (Western Australia) – Indigenous participation (Sequestration)

This is a local Western Australian project that combines biodiverse native environmental plantings with sustainable plantation forestry to deliver long-term environmental and climate benefits. Located in South-West Western Australia, the project covers 24 hectares of former pastureland were direct seeded using more than 40 biodiverse mixed native species including eucalypts, melaleucas, casuarinas, acacias, hakeas and banksias.

Developed under an inclusive governance model enabling Wirlomin Noongar custodians involved in the project operations, earn a share of the carbon projects' revenue and to pave a pathway for their full ownership of the property over time. The Wilyun Pools protect many endemic flora and fauna (like Tiny Honey Possum, Western Ground parrot, Quokka, Malleefowl etc.), forms a key ecological corridor, linking over 80 km of coastal vegetation and forming part of the Gondwana Link initiative, which strengthens habitat connectivity and supports Noongar families' return to Country through cultural and conservation activities.

This project is protected under a 100-year Carbon Right and Covenant.

Axis Wind Farms (India) Renewable energy – International (Avoidance)

This project generates clean electricity by converting wind energy into electrical energy (avoiding greenhouse gas emissions). Thereby, the greenhouse gas emissions that would have come from the electricity generated through thermal/fossil fuel-based power plants is avoided.

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
Biodiverse Reforestation Carbon Offsets (BRCO) <i>Wilyun Pools</i> project, Australia	BRCO	Australia	4.5 MW Sechi grid- connected hydro electric project in Himachal Pradesh.	258	<u>Biodiverse Reforestation Carbon Offsets (BRCO) – Wilyun Pools</u>

7. RENEWABLE ENERGY CERTIFICATE (REC) SUMMARY

Renewable Energy Certificate (REC) summary

N/A

APPENDIX A: ADDITIONAL INFORMATION



In accordance with its
Climate Active Certification

City of Subiaco

has permanently surrendered

258

Biodiverse Reforestation Carbon Offsets -
from the Wilyun Pools Project, Australia

Thank you for making a difference to our planet and
future generations by combating climate change.



Dr Phil Ireland | Chief Executive Officer

Issue Date: 22 December 2025 | **Emissions Period:** 1 July 2024 - 30 June 2025

Serial numbers (inclusive): SWCP-B1-16/0004061-0004318

Serial numbers (inclusive): 295,545,168 - 295,545,425

carbonneutral 
Turn Emissions into Trees®

Encouraging positive social, environmental
and economic change with solutions that help
overcome the effects of the climate crisis.

Carbon Neutral Pty Ltd is regulated by the Australian
Securities and Investments Commission and holds
Australian Financial Services Licence Number 63004

Carbon Neutral retires an equal number of carbon credits from a certified international project for all Biodiverse
Reforestation Carbon Offsets to satisfy claims of carbon offsetting (and carbon neutrality where applicable).



Australian National Registry of Emissions Units

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- Accounts
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- Public Reports

Logged in as: Chelsea Millar / Industry User

Reminder: Australian carbon credit units (ACCUs) have been migrated to ANREU accounts in the [Unit and Certificate Registry](#). ACCUs can no longer be managed in the ANREU system. The ANREU system will continue to support the management of Certified Emission Reduction (CER) units only.

Transaction Details

Transaction details appear below.

Transaction ID	AU45648
Current Status	Completed (4)
Status Date	22/12/2025 14:17:20 (AEDT) 22/12/2025 03:17:20 (GMT)
Transaction Type	Cancellation (4)
Transaction Initiator	Millar, Chelsea
Transaction Approver	Rogers, Georgiana S A
Comment	Surrendered 1,890 tonnes of CO2-e (t CO2-e) emissions unit on behalf of City of Subiaco to support its carbon neutral claim against the Climate Active Carbon Neutral Standard for FY 2024-25.

Transferring Account

Account Number	AU-2545
Account Name	Carbon Neutral Pty Ltd
Account Holder	Carbon Neutral Pty Ltd

Acquiring Account

Account Number	AU-2784
Account Name	Voluntary Cancellation – CP2
Account Holder	Commonwealth of Australia

Transaction Blocks

Party	Type	Transaction Type	Original CP	Current CP	ERF Project ID	NGER Facility ID	NGER Facility Name	Safeguard	Kyoto Project #	Vintage	Expiry Date	Serial Range	Quantity
IN	CER	Kyoto Voluntary Cancellation	2	2					IN-9167			295,545,168 - 295,545,425	258

Transaction Status History

Status Date	Status Code
22/12/2025 14:17:20 (AEDT) 22/12/2025 03:17:20 (GMT)	Completed (4)

AU-2545: Carbon Neutral Pty Ltd

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Transaction details

Completed

Transaction ID
82380000

Transaction type
Voluntary cancellation

Transferring account
AU-2545: Carbon Neutral Pty Ltd
CARBON NEUTRAL PTY LTD

Acquiring account
AU-1068: Australia Voluntary Cancellation Account
Commonwealth of Australia

Comments

Surrendered 1,890 tonnes of CO₂-e (t CO₂-e) emissions unit on behalf of City of Subiaco to support its carbon neutral claim against the Climate Active Carbon Neutral Standard for FY 2024-25.

Selected ACCUs

Project ID	Project name	Method type	Method	Vintage	Location	Quantity
EOPI00960	Olkola Ajin – Olkola Fire Project	Savanna Fire Management	Emissions Abatement through...	2021-22	QLD	378
						Total: 378
1 10 items per page						1 - 1 of 1 items

Transaction history

Action	Date and time	Authorised representative
Approved	22/12/2025 11:19:40 AM +08:00	Georgiana Rogers
Initiated	22/12/2025 11:15:04 AM +08:00	Chelsea Millar

AU-2545: Carbon Neutral Pty Ltd

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Transaction details

Completed

Transaction ID
82380000

Transaction type
Voluntary cancellation

Transferring account
AU-2545: Carbon Neutral Pty Ltd
CARBON NEUTRAL PTY LTD

Acquiring account
AU-1068: Australia Voluntary Cancellation Account
Commonwealth of Australia

Comments

Surrendered 1,890 tonnes of CO₂-e (t CO₂-e) emissions unit on behalf of City of Subiaco to support its carbon neutral claim against the Climate Active Carbon Neutral Standard for FY 2024-25.

Selected ACCUs

od	Vintage	Location	Serial range start	Serial range end	Category	Quantity
ions ement through...	2021-22	QLD	8,342,398,288	8,342,398,665	KACCU	378
						Total: 378
1 10 items per page						1 - 1 of 1 items

Transaction history

Action	Date and time	Authorised representative
Approved	22/12/2025 11:19:40 AM +08:00	Georgiana Rogers
Initiated	22/12/2025 11:15:04 AM +08:00	Chelsea Millar

Home

RETIRED UNITS

From Vintage	To Vintage	Serial Number	Quantity of Units	Unit Type	Project ID	Project Name	Project Type	Additional Issuance Certifications	Origination Program	Project Site State/Province	Project Country/Area	Account Holder	Retirement Reason	Beneficial Owner	Retirement Reason Details	Date of Retirement
01/01/2020	31/12/2020	10728-244913944-244915197-VCS-VCU-1491-VER-IN-1-2052-01012020-31122020-0	1254	VCU	2052	Renewable Wind Power Project by Axis Wind Farms (Rayalaseema) Pvt. Ltd	Energy Industries (renewable/non-renewable sources)			Andhra Pradesh	India (IN)	Carbon Neutral Pty Ltd	Retirement for Person or Organization	City of Subiaco	Surrendered 1,890 tonnes of CO2-e (t CO2-e) emissions unit on behalf of City of Subiaco to support its carbon neutral claim against the Climate Active Carbon Neutral Standard for FY 2024-25.	22/12/2025

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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	0	0	0%
Total non-grid renewable electricity	0	0	0%
LGC Purchased and retired (kWh) (including PPAs)	0	0	0%
GreenPower	1,562,699	0	60%
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)	470,432	0	18%
Residual Electricity	552,372	508,182	0%
Total renewable electricity (grid + non grid)	2,033,131	0	79%
Total grid electricity	2,585,503	508,182	79%
Total electricity (grid + non grid)	2,585,503	508,182	79%
Percentage of residual electricity consumption under operational control	100%		
Residual electricity consumption under operational control	552,372	508,182	
Scope 2	486,328	447,421	
Scope 3 (includes T&D emissions from consumption under operational control)	66,044	60,761	
Residual electricity consumption not under operational control	0	0	
Scope 3	0	0	

Total renewables (grid and non-grid)	78.64%
Mandatory	18.20%
Voluntary	60.44%
Behind the meter	0.00%
Residual scope 2 emissions (t CO₂-e)	447.42
Residual scope 3 emissions (t CO₂-e)	60.76
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO₂-e)	447.42
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO₂-e)	60.76
Total emissions liability (t CO₂-e)	508.18
<i>Figures may not sum to total due to rounding. Renewable percentage can be above 100%</i>	

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)
ACT	0	0	0	0	0	0
NSW	0	0	0	0	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	2,479,757	2,479,757	1,264,676	148,785	0	0
TAS	0	0	0	0	0	0
Grid electricity (scope 2 and 3)	2,479,757	2,479,757	1,264,676	148,785	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)	2,479,757					

Residual scope 2 emissions (t CO₂-e)	1,264.68
Residual scope 3 emissions (t CO₂-e)	148.79
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO₂-e)	1,264.68
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO₂-e)	148.79
Total emissions liability	1,413.46

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 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

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
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:

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.

Excluded emissions sources summary

Emission sources tested for relevance	Size	Influence	Risk	Stakeholders	Outsourcing	Justification
Council-owned commercial investment properties.	Y	N	N	N	N	Size: The emissions from this source are likely to be large (>10%) compared to the City of Subiaco's total emissions from electricity, stationary energy, and fuel emissions. Influence: Council-owned investment properties are on long-term commercial leases and, as such, the City of Subiaco do not have sufficient influence over the applicable operations (i.e. do not have the ability to develop and implement operational policies, health and safety policies, or environmental management policies). 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: The City of Subiaco have not previously undertaken this activity within our emissions boundary and comparable organisations do not typically undertake this activity within their boundary.
Council resident waste disposal.	Y	N	N	N	N	Size: The emissions from this source are likely to be large (potentially 17 times, according to Ironbark Sustainability, 2020) the City of Subiaco's total emissions from electricity, stationary energy, and fuel emissions. Influence: The emissions from this source are not generated by Council operations, and therefore the City of Subiaco have minimal influence over the source. The City took steps during FY 2022/23 to influence a reduction in resident and business waste within the municipality by implementing a Food Organics and Waste Organics disposal service to reduce the amount of organic waste being processed at a landfill facility. Risk: There are no relevant laws or regulations that apply to limit emissions specifically from this source. The State government is implementing the Waste Avoidance and Resource Recovery Strategy 2030 which may result in legislated emissions reduction targets from waste in coming years. Stakeholders: Key stakeholders, including the public, are unlikely to consider this a relevant source of emissions for our business. Outsourcing: The City of Subiaco 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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