



# **PUBLIC DISCLOSURE STATEMENT**

**FELIX MOBILE**

**SERVICE CERTIFICATION  
FY2020–21 (TRUE-UP)**

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



NAME OF CERTIFIED ENTITY	TPG Telecom Limited
REPORTING PERIOD	1 July 2020 – 30 June 2021 (true-up)
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>Paul Tierney General Manager – Business Development</p>



**Australian Government**  
**Department of Industry, Science,  
Energy and Resources**

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Version September 2021. To be used for FY20/21 reporting onwards.



# 1.CERTIFICATION SUMMARY

TOTAL EMISSIONS OFFSET	388 tCO2-e
THE OFFSETS BOUGHT	40.7% ACCUs, 59.3% VERs
RENEWABLE ELECTRICITY	100% renewable electricity
TECHNICAL ASSESSMENT	16 June 2020 Kara Robinson South Pole Australia Pty Ltd <b>Next technical assessment due:</b> 31 October 2023

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## 2. CARBON NEUTRAL INFORMATION

### Description of certification

felix's account covers the six GHGs covered by the Kyoto Protocol: carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulphur hexafluoride (SF<sub>6</sub>). All emissions are reported in tonnes of carbon dioxide equivalent (tCO<sub>2</sub>-e).

This Climate Active Service certification is for the business and customer support operations of felix. This service includes all emissions that are non-attributable to felix's Climate Active Carbon Neutral Product certification, but which are of relevance to the operations felix, as defined through the Climate Active Relevance Test.

The scope of this service includes:

- the operation of offices and call centres in Sydney and Hobart – including electricity consumption, waste, water, IT equipment, office machinery, and other consumables
- electricity and diesel consumption for data centres
- business travel
- employee commuting
- freight of goods
- third party business services (e.g. legal, marketing and advertising services)

The functional unit for this product certification is: 1 year of access to mobile 3G/4G voice and data for one felix customer - excluding customer device and associated use.

### Service description

felix is a new digital mobile service provider, launched by TPG Telecom Limited (ABN 76096304620) in 2020, which offers mobile phone plans leveraging the TPG mobile network.

felix exists as a business unit within TPG Telecom Limited (ABN 76096304620) and is not a registered business with a unique ABN. As a result, certification as an 'Organisation' under the Climate Active Carbon Neutral Standard for Organisations was not possible.

*“It is critical that businesses understand their impact on the environment, work to minimise and offset these impacts, and where possible actually drive positive impacts for the benefit of our future generations.”*

felix has both a product and service Climate Active certification. The service certification is deemed to be the parent certification and as such, any shared emission sources will be offset through the service certification only as per the Climate Active guidance on *Emission boundary: Shared emissions*.

Unlike the TPG brand, felix will not operate storefronts nor sell handsets. felix's product offering is limited to access to the mobile network via SIM cards which are ordered online and directly shipped to customers.

As such, the emissions for this product have been calculated in kgCO<sub>2</sub>e per customer connected to the mobile 3G/4G voice and data network, calculated based on the average number of felix customers connected to the mobile network for the reporting year.

## 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' that become the product, make the product and carry the product through its life cycle. These 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

Stationary combustion fuels (incl. well-to-tank emissions)

Electricity – offices, data centre, and base building (incl. transmission and distribution losses)

Base building fuels (incl. well-to-tank emissions)

Business travel

Waste

Water (supply and treatment)

IT

Advertising and promotion

Third party business services

Other miscellaneous products and third party services

### Non-quantified

Base building refrigerants

Electricity consumption in outsourced international call centres

### Optionally included

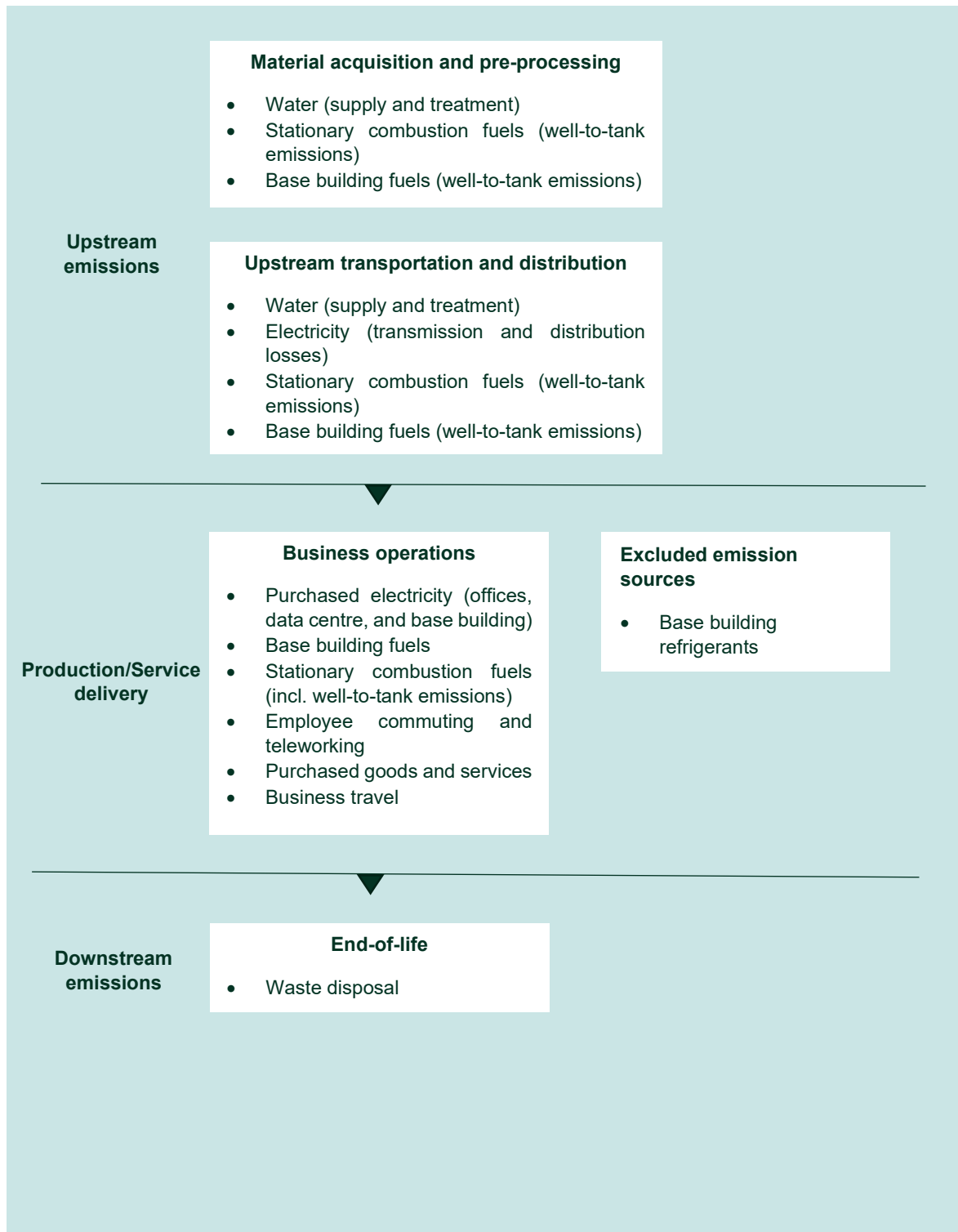
## Outside emission boundary

### Non-attributable

Non-electricity emissions associated with outsourced international call centres (other than electricity)

Operations of prepaid points of presence where [brand] SIM cards sold (e.g. supermarkets, petrol stations, etc.)

## Service process diagram





## **Data management plan for non-quantified sources**

There are no non-quantified sources in the emission boundary that require a data management plan. The initial emissions from the construction of the mobile phone network have not been quantified but repairs and replacements have been quantified through the calculation of emissions from annual network construction and maintenance. These repairs and replacements are quantified as ongoing/new embodied emissions in the mobile phone network.

## 4.EMISSIONS REDUCTIONS

### Emissions reduction strategy

Sustainability is one of our key foundational values and we strive to operate our business in an environmentally friendly way.

The felix ongoing sustainability strategy includes:

- Increasing flexible/remote working to reduce employee commuting, targeting a minimum of two days remote working per week, and encouraging public transport use.
- Targeting zero air travel, with any air travel by exception only.
- Ensuring energy efficiency of office space, prioritising office spaces which have received high Green Star and NABERS' ratings.
- Reviewing IT vendor and architecture to prioritise Cloud platforms with lower carbon footprints.
- Reviewing other vendor and partner selection to prioritise products and services with lower carbon footprints, and/or encouraging existing vendors to reduce their carbon footprints or target carbon neutrality.
- Developing the use of eSIM technologies (due for launch in 2022) to transition away from physical SIM cards and therefore avoid the manufacture and transport required currently.

## 5. EMISSIONS SUMMARY

### Emissions over time

Emissions since base year		Total tCO <sub>2</sub> -e	Emissions intensity of the functional unit
Base year:	FY 2018–19	55	0.0055
Year 1 (projected):	FY 2020–21	139	0.0055
Year 1:	FY 2020–21	388	0.09

### Significant changes in emissions

felix's emissions have increased significantly compared to the projected FY2020-21 emissions numbers. This is mainly attributable to the significant increase in spending per customer related to advertising and promotion in FY 2020-21. Emissions related to advertising and promotion contributed to more than 60% of felix's total service emissions. The FY 2018-19 considered the advertising and promotion for TPG's existing services which had already been established. The launch of felix required additional spending on advertising and promotion to market the new service to audiences. However, renewable electricity was also purchased for the launch of felix, resulting in zero emissions for operational electricity consumption.

Emission source name	Current year (tCO <sub>2</sub> -e and/ or activity data)	Previous year (tCO <sub>2</sub> -e and/ or activity data)	Detailed reason for change
Electricity	0 tCO <sub>2</sub> e	30 tCO <sub>2</sub> e	felix is a 100% renewable electricity service. As the base year calculations for FY18-19 were based upon TPG's whole operations, this did not account for the LGCs that were purchased for felix.
Computer and technical services	53 tCO <sub>2</sub> e	0.35 tCO <sub>2</sub> e	FY2018-19 data, upon which FY20-21 was projected, did not account for the high amount of IT infrastructure required to accommodate the COVID-19 pandemic (as this was not forecasted). As a result, the number was much higher in reality.
Advertising and promotion	274 tCO <sub>2</sub> e	13 tCO <sub>2</sub> e	The FY 2018-19 accounting considered the advertising and promotion for TPG's existing services which had already

			been established, and were not taking into account the launch of a new mobile service. The launch of felix required additional spending on advertising and promotion to market the new service.
Third party business services	39 tCO2e	7 tCO2e	The FY 2018-19 accounting considered the third party business services for TPG's existing services which had already been established, but not specified. Many third party business services such as education/training expenditure were bundled with miscellaneous expenditure, and therefore included in the "Other miscellaneous products and third party services" category.

Several projected emission sources have been combined under "Other miscellaneous products and third-party services" due to the nature of data collection for TPG after FY2020-2021. These include:

- Freight
- Food and drink
- Paper
- Office furniture
- Office machinery
- Office supplies
- Staff mobile phones
- Telecommunications
- Postage and courier services
- Office supplies

For future footprints, TPG will aim to collect this data separately.

Additionally, "IT" and "advertising and promotion" was included in the FY2020-2021 footprint, but was not previously projected.

## **Use of Climate Active carbon neutral products and services**

TPG Telecom uses South Pole Australia as a primary consultant for its Climate Active submission. TPG Telecom also uses ANZ for banking services.

## Service emissions summary

Stage	Projected tCO <sub>2</sub> -e	Actual tCO <sub>2</sub> -e
Stationary combustion fuels (including well-to-tank emissions)	0.03	0.003
Purchased electricity (including transmission and distribution losses and base building electricity)	72.30	0.00
Electricity consumption in outsourced international call centres	2.20	0.00*
Base building fuels (including well-to-tank emissions)	0.27	0.80
Business travel	10.23	1.38
Employee commute	7.25	9.38
Working from home	0.00	-8.66
Waste	0.12	0.71
Water (supply and treatment)	0.14	0.62
IT	0.00	53.07
Advertising and promotion	0.00	274.35
Third party business services	38.25	6.52
Other miscellaneous products and third party services	7.36	49.16
<b>Total Net Emissions</b>	<b>139</b>	<b>388</b>
<b>Difference between projected and actual</b>		<b>-249 tCO<sub>2</sub>-e</b>

\* Electricity consumption in outsourced international call centres was previously projected, but considered immaterial and therefore non-quantified for the actual year.

Emissions intensity per functional unit (including any uplifts required)	0.081
Number of functional units to be offset (certified)	4836
Total emissions to be offset (certified)	388

## 6. CARBON OFFSETS

### Offsets strategy

#### Offset purchasing strategy: Forward purchasing

1. Total offsets previously forward purchased and banked for this report	139 tCO <sub>2</sub> e
2. Total emissions liability to offset for this report	388 tCO <sub>2</sub> e
3. Net offset balance for this reporting period	249 tCO <sub>2</sub> e
4. Total offsets to be forward purchased to offset the next reporting period	866 tCO <sub>2</sub> e
5. Total offsets required for this report	388 tCO <sub>2</sub> e

### Co-benefits

In total, felix has purchased 1,414 tCO<sub>2</sub>e of offsets from South Pole, consisting of 735 tCO<sub>2</sub>e from the Aak Puul Ngantam Savanna Burning Project in Cape York, Australia and 679 tCO<sub>2</sub>e from the Prony Wind Power Project in New Caledonia.

#### Aak Puul Ngantam Savanna Burning Project

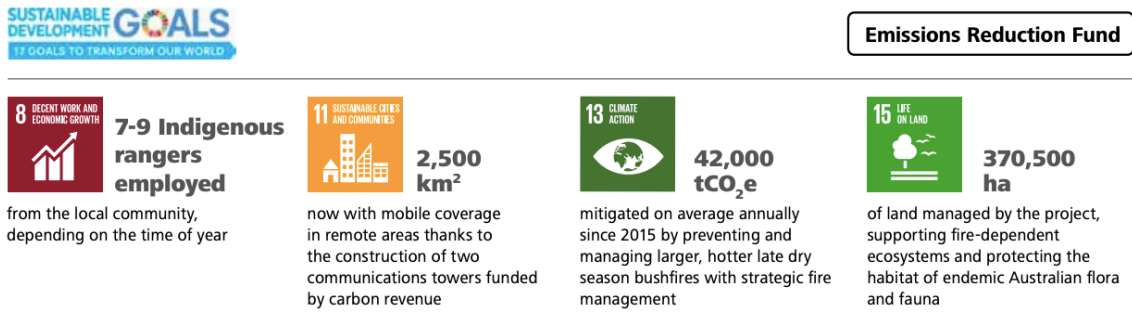
Bounded by the Ward and Watson Rivers about 630 km northwest of Cairns, the community of Aurukun in the Western Cape York is home to over 1200 people. For tens of thousands of years, Traditional Custodians the Wik and Kugu people managed the area's savannas strategically with fire. Without this management, intensely destructive fires tear through these ecosystems in the dry season – threatening wildlife, livestock and human communities.

Operated by Indigenous-owned & directed not-for-profit Aak Puul Ngantam (APN Cape York) in partnership with Balkanu Cape York Development Corporation, the Aak Puul Ngantam Savanna Burning project comprises 370,000 hectares of land on Traditional Homelands. Project rangers implement planned 'cool' fires early in the dry season to reduce fuel loads, preventing more intense bushfires later on – thereby reducing emissions. APN Cape York have extensive skills in strategic savanna burning, with aerial and onground burning operations since 2013. The property is broken into zones, depending on how often areas need management; high traffic zones require burning every year, while others are burnt less frequently.

As well as reducing emissions by controlling and preventing large, intense and uncontrollable bushfires, the Aak Puul Ngantam Savanna Burning project employs local Indigenous people as project rangers,

engaging Wik and Kugu people in traditional practices to care for and connect with their ancestral homelands. Revenue raised from the sale of carbon credits supports a range of activities that APN Cape York runs alongside the carbon project – such as funding the installation of two communications towers to increase connectivity in the region. Rangers and others out on country can now travel knowing that they can call for assistance and keep in touch with family, even in extremely remote areas.

Below is the contribution towards the United Nations Sustainable Development Goals made by the Aak Puul Ngantam Savanna Burning Project:



View the factsheet for the Aak Puul Ngantam Savanna Burning Project:

<https://a.southpole.com/public/media/302635/2635.pdf>

### Prony Wind Power Project, New Caledonia

Islands of the Pacific Ocean like New Caledonia face serious environmental and socioeconomic pressures that are exacerbated by climate change. Pacific Island nations are already severely affected by extreme weather and climate variability, and their inhabitants are amongst the world’s most vulnerable communities to the growing effects of climate change. Yet in New Caledonia, 80 percent of energy demands are met by fossil fuel power plants.

Prony Wind Power involves six wind farms located at two different sites on the island of New Caledonia that supply electricity to the local grid. The Kafeate and Prony sites consist of 116 wind turbines with a total capacity of 31 MW, with an estimated yearly production of 40 GWh of emissions-free, renewable electricity

By displacing greenhouse gas emissions from fossil fuel power plants with renewable electricity, Prony Wind Power contributes to global climate action. The project has also boosted local economies, creating employment in both the construction and operational phases and spreading technological know-how. Prony’s success is a tribute the viability and value of sustainable development in small island nations, promoting climate awareness and action, and ultimately increasing climate resilience in the Pacific Island region.

Below is the contribution towards the United Nations Sustainable Development Goals made by the Prony Wind Power Project:





**40,000 MWh**

generated on average annually, providing a clean alternative to fossil fuels



**26 jobs**

created for the maintenance and operation of the project, most filled by island nationals



**Technology know-how**

shared with the region, contributing to the development of New Caledonia's wind energy sector



**36,000 tCO<sub>2</sub>e**

mitigated on average annually

For more information on the UN Sustainable Development Goals, please visit: <http://www.un.org/sustainabledevelopment/sustainable-development-goals/>

**Official name:** Prony and Kafate wind-farms, New Caledonia | **Registry link:** <https://registry.goldstandard.org/projects/details/1001> | **Registry ID:** GS 566

View the factsheet for the Prony Wind Power Project:

<https://a.southpole.com/public/media/300344/0344.pdf>

See [guidance](#) on page 69.

## Offsets summary

### Proof of cancellation of offset units

Offsets cancelled for Climate Active Carbon Neutral Certification										
Project description	Type of offset units	Registry	Date retired	Serial number (and hyperlink to registry transaction record)	Vintage	Eligible Quantity (tCO <sub>2</sub> -e)	Quantity used for previous reporting periods	Quantity banked for future reporting periods	Quantity used for this reporting period claim	Percentage of total (%)
"Aak Puul Ngantam" Savanna Burning Project	ACCU	ANREU	Jun 24, 2020	3,799,428,512 - 3,799,429,226 <sup>a</sup>	2019-20	715	83 <sup>b</sup>	484	148	38.2
"Aak Puul Ngantam" Savanna Burning Project	ACCU	ANREU	Jun 24, 2020	3,799,440,627 - 3,799,440,646 <sup>a</sup>	2019-20	20	10 <sup>b</sup>	0	10	2.6
Prony and Kafeate wind-farms, New Caledonia	VER	GS Registry	Jun 30, 2020	<a href="#">GS1-1-NC-GS566-12-2014-5968-9332-10010</a>	2014	679	67 <sup>b</sup>	382	230	59.2
<b>Total offsets retired this report and used in this report</b>									388	
<b>Total offsets retired this report and banked for future reports</b>									866	
Type of offset units				Quantity (used for this reporting period claim)			Percentage of total			
Australian Carbon Credit Units (ACCU)				158			40.7			
Verified Emissions Reductions (VERs)				230			59.3			

<sup>a</sup> A hyperlink to the ANREU registry transaction record is unable to be provided. Evidence of the offset retirement has been provided to Climate Active.

<sup>b</sup> 160 credits have been used for the felix Climate Active product certification FY20-21 report.

## 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.

<b>1. Large-scale Generation certificates (LGCs)*</b>	47
<b>2. Other RECs</b>	0

\* LGCs in this table only include those surrendered voluntarily (including through PPA arrangements), and does not include those surrendered in relation to the LRET, GreenPower, and jurisdictional renewables.

Project supported by LGC purchase	Eligible units	Registry	Surrender date	Accreditation code (LGCs)	Certificate serial number	Generation year	Quantity (MWh)	Fuel source	Location
HJ Langdon Commercial Solar	LGC	REC Registry	4 September 2020	SRPVVCD5	0000018818-SRPVVCD5-2020-0000267 to 000018818-SRPVVCD5-2020-0000420	2020	16	Solar	Derrimut, Victoria, Australia
Tibaldi Meats Commercial Solar	LGC	REC Registry	4 September 2020	SRPVVCJ9	000018818-SRPVVCJ9-2020-0000001 to 000018818-SRPVVCJ9-2020-0000288	2020	31	Solar	Clayton, Victoria, Australia
<i>Total LGCs surrendered this report and used in this report</i>							47		

# APPENDIX A: ADDITIONAL INFORMATION

N/A

## APPENDIX B: ELECTRICITY SUMMARY

Electricity emissions are calculated using a **market-based approach**.

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 approach summary

Market-based approach	Activity data (kWh)	Emissions (kgCO <sub>2</sub> -e)	Renewable % of total
Behind the meter consumption of electricity generated	0	0	0%
<b>Total non-grid electricity</b>	<b>0</b>	<b>0</b>	<b>0%</b>
LGC purchased and retired (kWh) (including PPAs & Precinct LGCs)	46,164	0	78%
GreenPower	1,591	0	3%
Jurisdictional renewables (LGCs retired)	0	0	0%
Jurisdictional renewables (LRET) (applied to ACT grid electricity)	0	0	0%
Large Scale Renewable Energy Target (applied to grid electricity only)	11,147	0	19%
Residual electricity	0	0	0%
<b>Total grid electricity</b>	<b>58,902</b>	<b>0</b>	<b>100%</b>
<b>Total electricity consumed (grid + non grid)</b>	<b>58,902</b>	<b>0</b>	<b>100%</b>
Electricity renewables	58,902	0	
Residual electricity	0	0	
<b>Exported on-site generated electricity</b>	<b>0</b>	<b>0</b>	
Emission footprint (kgCO <sub>2</sub> -e)		0	

<b>Total renewables (grid and non-grid)</b>	100.00%
<b>Mandatory</b>	18.93%
<b>Voluntary</b>	81.08%
<b>Behind the meter</b>	0.00%
<b>Residual electricity emission footprint (tCO<sub>2</sub>-e)</b>	<b>0</b>

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

### Location-based approach summary

Location-based approach	Activity data (kWh)	Emissions (kgCO <sub>2</sub> -e)
ACT	0	0
NSW	31,730	28,557
SA	0	0
Vic	0	0
Qld	0	0
NT	0	0
WA	0	0

Tas	27,173	4,619
<b>Grid electricity (scope 2 and 3)</b>	<b>58,902</b>	<b>33,176</b>
ACT	0	0
NSW	0	0
SA	0	0
Vic	0	0
Qld	0	0
NT	0	0
WA	0	0
Tas	0	0
<b>Non-grid electricity (behind the meter)</b>	<b>0</b>	<b>0</b>
<b>Total electricity consumed</b>	<b>58,902</b>	<b>33,176</b>
<b>Emission footprint (tCO<sub>2</sub>-e)</b>	<b>33</b>	

### Climate Active carbon neutral electricity summary

Carbon neutral electricity offset by Climate Active product	Activity data (kWh)	Emissions (kgCO <sub>2</sub> -e)
N/A	0	0

*Climate Active carbon neutral electricity is not considered renewable electricity. The emissions have been offset by another Climate Active carbon neutral product certification.*

# APPENDIX C: INSIDE EMISSIONS BOUNDARY

## Non-quantified emission sources

The following sources emissions 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	(1) Immaterial	(2) Cost effective (but uplift applied)	(3) Data unavailable (but uplift applied & data plan in place)	(4) Maintenance
Electricity consumption in outsourced international call centres	Yes	No	No	No

## 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**).

	No actual data	No projected data	Immaterial
Base building refrigerants	Yes	Yes	Yes

## 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.

Relevance test					
Non-attributable emission	<i>The emissions from a particular source are likely to be large relative to the organisation's electricity, stationary energy and fuel emissions</i>	<i>The emissions from a particular source contribute to the organisation's greenhouse gas risk exposure.</i>	<i>Key stakeholders deem the emissions from a particular source are relevant.</i>	<i>The responsible entity has the potential to influence the reduction of emissions from a particular source.</i>	<i>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.</i>
Non-electricity emissions associated with outsourced international call centres (other than electricity)	No	No	No	No	No
Operations of prepaid points of presence where [brand] SIM cards sold (e.g. supermarkets, petrol stations, etc.)	No	No	No	No	No





An Australian Government Initiative

