



PUBLIC DISCLOSURE STATEMENT

FELIX MOBILE

SERVICE CERTIFICATION

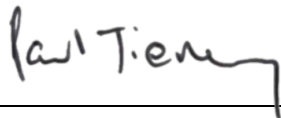
FY2021–22

Australian Government
Climate Active
Public Disclosure Statement



An Australian Government Initiative



NAME OF CERTIFIED ENTITY	TPG TELECOM LIMITED
REPORTING PERIOD	1 July 2021 – 31 June 2022 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></p> <p>Paul Tierney General Manager Felix & Customer Lifecycle Management 8th September 2023</p>



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

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Version March 2022.



1.CERTIFICATION SUMMARY

TOTAL EMISSIONS OFFSET	196 tCO ₂ -e
THE OFFSETS BOUGHT	100% ACCUs
RENEWABLE ELECTRICITY	100%
TECHNICAL ASSESSMENT	16/06/2020 South Pole Next technical assessment due: FY2023

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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 (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulphur hexafluoride (SF₆). All emissions are reported in tonnes of carbon dioxide equivalent (tCO₂-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 business and customer support services for one felix customer.

Service description

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

The service certification covers all emissions associated with the administration and running of the felix business unit within TPG Telecom. The service is full coverage and includes the emissions from cradle-to-grave.

“Obtaining the Climate Active certification is crucial for felix to be able to bring our mission to life. Through partnering with a government-backed initiative, we are doing our part to reduce our emissions and take action against the negative effects of climate change.”

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)

Business travel

Waste

Water (supply and
treatment)

Advertising and promotion

Employee commuting

Working from Home

Non-quantified

Base building refrigerants

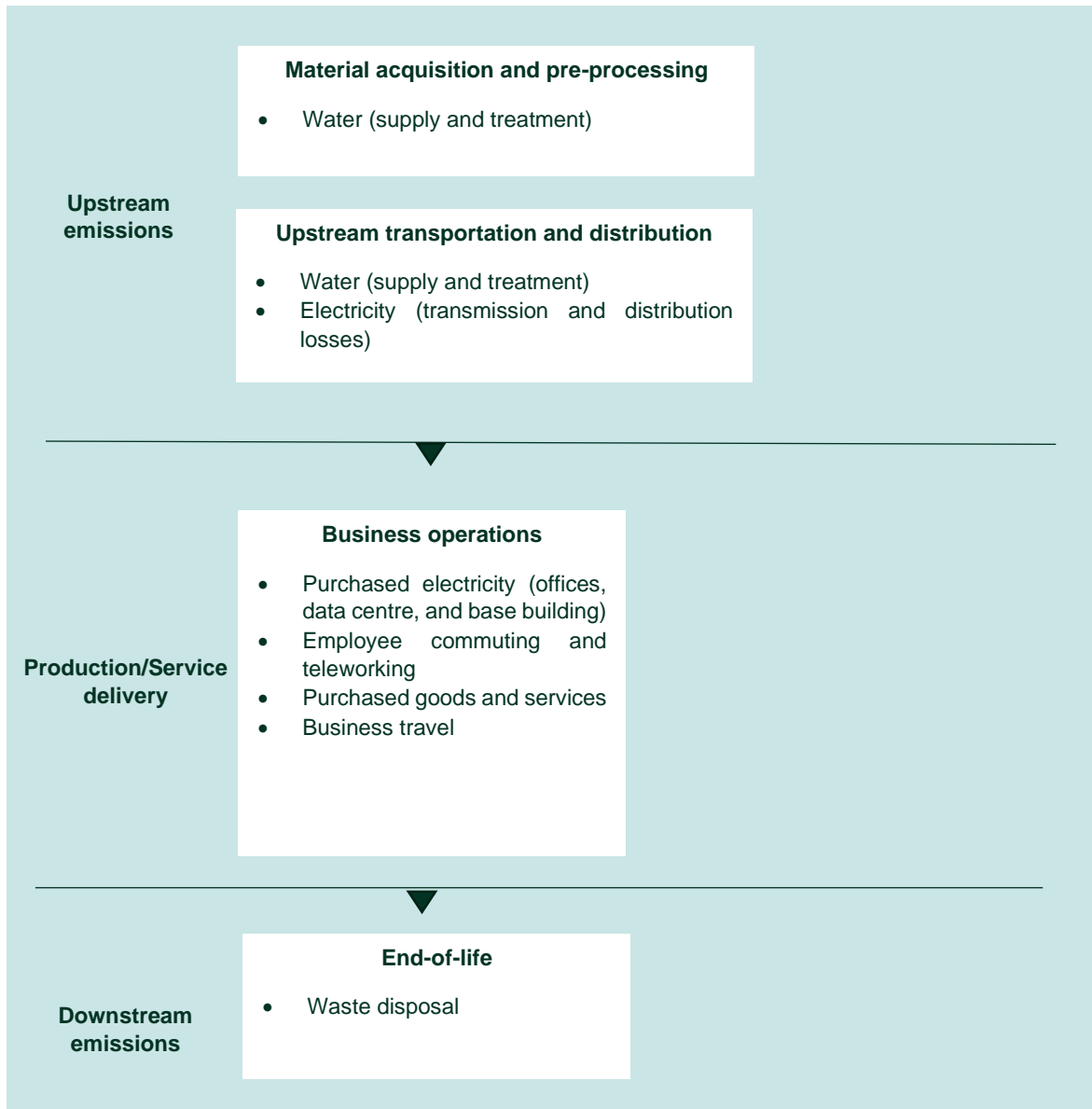
Optionally included

Outside emission boundary

Non-attributable

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 service is provided using the TPG Telecom mobile network, and the operation of this mobile network uses electricity which in turn generates emissions. This electricity accounts for the majority of emissions relating to the felix product.

TPG Telecom have an ongoing focus on the energy efficiency of the mobile network and undertake various initiatives to reduce energy usage:

- Over the past six years, across the mobile network, older Uninterrupted Power Supply systems have been replaced with more energy efficient equipment.
- A range of design solutions have been introduced to improve energy efficiency and reduce emissions associated with mobile base stations including free cooling measures that improve airflow circulation using low powered fans, significantly reducing the need for air conditioning. At the Dean Park base station in NSW, TPG Telecom have seen a 90 per cent reduction in daily air conditioning use following the upgrade.
- In partnership with ICS Industries, TPG Telecom has contributed funding to support the development of the Zonecool™ shelter - a more efficient and cost-effective base station equipment shelter solution which targets cooling to specific zones and utilises high capacity racking enabling optimal use of space for future technologies.
- Direct current power systems have also been implemented across all data centres and air conditioning chillers have been replaced with computer room air conditioning units, typically delivering an estimated 25 per cent energy saving.

In March 2021, TPG Telecom announced a commitment to power its entire operations across Australia with 100% renewable electricity by 2025 and have committed to setting a Science-based Target for reducing greenhouse gas emissions across our value chain, aligned to net zero. As part of the commitment, the science-based targets will be developed in accordance with the Science Based Target initiative (SBTi), to ensure that the targets are credible, meaningful and in line with the latest climate science. The targets are expected to be completed and submitted to the SBTi for validation in 2022. They will cover absolute emissions reductions across TPG Telecom's Scope 1, 2 & 3 emissions footprint and will include a 2030 target, as well as a 2050 net zero target.

For felix, these targets will reduce its Scope 3 emissions footprint in-line with the 2030 and net zero targets for TPG Telecom

felix have designed our SIM cards and packaging to minimise waste, we have also launched eSIM technology to reduce the use of plastic related to the physical SIM. felix also intends to launch a partnership with Mobile muster to focus on reducing e-waste and offering our customers the opportunity to recycle their used mobile phones. All these measures also contribute to the reduction of emissions associated with waste.

Emissions reduction actions

felix continued its ambition to operate under 100% renewable energy by purchasing renewable energy certificates for their portion of electricity use within TPG Telecom. This includes purchasing renewable energy for their share of office electricity and network electricity. Electricity is a major contributor to emissions for felix, by purchasing renewable energy for the office felix was able to avoid 18 tCO₂-e for the office-based activities and 1,532 tCO₂-e from the network electricity.

5. EMISSIONS SUMMARY

Emissions over time

Emissions since base year		Total tCO ₂ -e	Emissions intensity of the functional unit
Base year:	FY 2018–19	55	0.0055
Year 1:	FY 2020–21	388	0.081
Year 2	FY 2021-22	196	0.0048

Significant changes in emissions

The emissions for the service saw a reduction in emissions due to activities that were carried out within the operations of the service. The movement to digital advertising that run on 100% renewable electricity, there was also a reduced amount of business travel and employee commuting due to COVID-19. The previous year had cost associated with digital upgrades to the service since it was the first year of operations; this year there was no digital upgrades required.

Emission source	Current year (tCO ₂ -e)	Previous year (tCO ₂ -e)	Reason for change
Digital advertising	192	274	The main advertising services (Google and Facebook) now operate on 100% renewable electricity reducing the emissions from digital advertising
Computer and technical services	0	53	There were no major expenses on digital upgrades of services during reporting period
Air travel	0	1	There were no flights during reporting period
Employee commuting	4.1	9.2	Due to more flexible working arrangements and ongoing pandemic employees were commuting less

Use of Climate Active carbon neutral products and services

Certified brand name	Service used
South Pole	Consulting

Service emissions summary

Stage	Emissions (tCO ₂ -e)
Purchased electricity (including transmission and distribution losses and base building electricity)	0.0
Business travel	0.2
Employee commute	4.1
Working from home	0.01
Waste	0.10
Water (supply and treatment)	0.02
Advertising and promotion	191.51
Total net emissions	195.94

Emissions intensity per functional unit (1 year of business and customer support services for one felix customer)	0.0048
Number of functional units to be offset	41,000
Total emissions to be offset (tCO ₂ -e)	196

6. CARBON OFFSETS

Offsets retirement approach

In arrears	
1. Total number of eligible offsets banked from last year's report	0 ¹
2. Total emissions footprint to offset for this report (tCO ₂ -e)	196
3. Total eligible offsets required for this report	196
4. Total eligible offsets purchased and retired for this report	196 ²
5. Total eligible offsets banked to use toward next year's report	0

Co-benefits

In total, felix has purchased 196 tCO₂-e of offsets from South Pole, consisting of 196tCO₂-e from the Mount Mulgrave project for the service certification. Additional credits were purchased for the product certification and relevant projects can be found in that PDS.

Mulgrave Savanna Fire Management

Savanna fire is a major source of global greenhouse gas (GHG) emissions in Australia, contributing to around 3% of the country's annual GHGs. By strategically planned to burn of savanna areas, the Mount Mulgrave project, located in North Queensland, aims to significantly reduce the risk of rampant wildfires spreading across the region in dry season.

Ran for seven years by a family local to the area, the project involves multiple fire management activities including the initiation of controlled fires to reduce flammable vegetation as well as firefighting. Through these preventative measures the project not only reduces global GHGs each year but equally preserves Northern Australia's unique landscape and protects the country's endemic wildlife. Moreover, as a market-based mechanism for climate protection, the initiative provides financial incentive to landowners to continue in climate-friendly fire management practices.

¹ No banked offsets used for this felix Climate Active service certification, but 866 previously banked units have been used for the felix Climate Active product certification for FY2021-22.

² 1,000 offset units have been retired; the remaining 804 units have been used for the felix Climate Active product certification for FY2021-22.

Eligible offsets retirement summary

Offsets retired for Climate Active carbon neutral certification											
Project description	Type of offset units	Registry	Date retired	Serial number (and hyperlink to registry transaction record)	Vintage	Stapled quantity	Eligible quantity (tCO ₂ -e)	Eligible quantity used for previous reporting periods	Eligible quantity banked for future reporting periods	Eligible quantity used for this reporting period	Percentage of total (%)
Mt Mulgrave Savanna Burning Project	ACCU	ANREU	13/12/2022	8,347,894,739 – 8,347,895,792 ³	2022-23	-	1000	804 ⁴	0	196	100%
Total offsets retired this report and used in this report										196	
Total offsets retired this report and banked for future reports									0		

Type of offset units	Quantity (used for this reporting period claim)	Percentage of total
Australian Carbon Credit Units (ACCU)	196	100%

³ A hyperlink to the ANREU registry transaction record is unable to be provided. Evidence of the offset retirement has been provided to Climate Active.

⁴ 804 credits have been used for the felix Climate Active product certification FY21-22 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.

1. Large-scale Generation certificates (LGCs)*	1880 ⁵
2. Other RECs	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.

⁵ This total covers voluntarily surrendered LGCs for both product and service carbon neutral certifications held by felix. 31 LGCs have been used for this FY2021-22 service certification; the remaining 1849 LGCs were used for the FY2021-22 product certification.

Project supported by LGC purchase	Eligible unit	Registry	Surrender date	Accreditation code (LGCs)	Certificate serial number	Generation year	Quantity (MWh)	Fuel source	Location
Mt Derrimut Rd Derrimut Solar - VIC	LGC	REC Registry	4 September 2020	SRPVVCD5	267-325; 326-377; 278-420	2020	92 ⁶	Solar	Derrimut, Victoria, Australia
TIBALDI Centre Road, Clayton - Solar - VIC	LGC	REC Registry	4 September 2020	SRPVVCJ9	1-59; 60-151; 152-239; 240-288	2020	171 ⁷	Solar	Clayton, Victoria, Australia
Australian Vintage AV300 - NSW – BURONGA w SGU	LGC	REC Registry	12 October 2022	SRPVNS56	1242-1366; 1367-1501	2022	260	Solar	Buronga, NSW, Australia
AZ Macquarie Park - Solar - NSW	LGC	REC Registry	12 October 2022	SRPVNS89	143-170; 171-199; 200-224; 225-258; 259-294	2022	152	Solar	Macquarie Park, NSW, Australia
AIT Gunnedah - Solar - NSW	LGC	REC Registry	12 October 2022	SRPVNSA3	251-295; 296-346; 347-398; 399-450; 451-513	2022	263	Solar	Gunnedah, NSW, Australia
Cochlear Macquarie Park - Solar - NSW	LGC	REC Registry	17 October 2022	SRPVNSH0	100-113; 114-130	2022	31	Solar	Macquarie Park, NSW, Australia
DHP 1MW - Solar - QLD	LGC	REC Registry	17 October 2022	SRPVQL50	320-360; 361-420; 421-476; 477-538; 539-592	2022	273	Solar	QLD, Australia
Caboolture Square Shopping Centre Solar Qld	LGC	REC Registry	17 October 2022	SRPVQL82	314-353; 354-394	2022	81	Solar	Caboolture, QLD, Australia
CRSL Caboolture 0.132MW - Solar - QLD	LGC	REC Registry	17 October 2022	SRPVQL82	91-103	2022	13	Solar	Caboolture, QLD, Australia
B&R Enclosures Solar PV QLD	LGC	REC Registry	12 October 2022	SRPVQLH2	402-467; 468-535	2022	134	Solar	QLD, Australia
AVL Merbein Solar VIC	LGC	REC Registry	12 October 2022	SRPVVC94	125-139; 140-162	2022	38	Solar	Merbein, Victoria, Australia

Burwood Brickworks - Solar - VIC	LGC	REC Registry	17 October 2022	SRPVVCX8	452-476; 477-512	2022	61	Solar	Burwood, NSW, Australia	
AAC23-Solar-WA	LGC	REC Registry	11 October 2022	SRPVWA44	135-136	2022	2	Solar	WA, Australia	
AAC04- Solar – WA	LGC	REC Registry	11 October 2022	SRPVWA49	84-90; 91-102; 103-118	2022	35	Solar	WA, Australia	
AAC22- Solar – WA	LGC	REC Registry	11 October 2022	SRPVWA54	24-36; 37-54; 55-76	2022	53	Solar	WA, Australia	
CJD - Guildford - Solar - WA	LGC	REC Registry	17 October 2022	SRPVWA57	91-101; 102-114	2022	24	Solar	Guildford, WA, Australia	
BG Beachside 0.2MW – Solar WA	LGC	REC Registry	12 October 2022	SRPVWA82	135-152; 153-175	2022	41	Solar	WA, Australia	
BG Fields 0.23MW – Solar WA	LGC	REC Registry	12 October 2022	SRPVWA87	195-218; 219-247	2022	53	Solar	WA, Australia	
BG Waters 0.14MW - Solar WA	LGC	REC Registry	12 October 2022	SRPVWA90	119-132; 133-150	2022	32	Solar	WA, Australia	
ABMT Textiles -SOLAR - VIC	LGC	REC Registry	17 October 2022	SRPXVC22	269-299; 300-339	2022	71	Solar	Victoria, Australia	
Total LGCs surrendered this report and used in this report							31⁸			

⁶ Total quantity surrendered is 154, of which 62 were used for previous felix product and service certifications (FY2020-21).

⁷ Total quantity surrendered is 288, of which 117 were used for previous felix product and service certifications (FY2020-21).

⁸ 31 LGCs have been used for this FY2021-22 service certification; the remaining 1849 LGCs have been used for the felix carbon neutral product certification for FY2021-22.

APPENDIX A: ADDITIONAL INFORMATION

N/A

APPENDIX B: ELECTRICITY SUMMARY

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

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.

Market-based approach summary			
Market-based approach	Activity data (kWh)	Emissions (kgCO ₂ -e)	Renewable percentage of total
Behind the meter consumption of electricity generated	0	0	0%
Total non-grid electricity	0	0	0%
LGC Purchased and retired (kWh) (including PPAs & Precinct LGCs)	31,000	0	103%
GreenPower	1,587	0	5%
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)	5,614	0	19%
Residual electricity	-8,000	-7,960	-26%
Total grid electricity	30,201	-7,960	100%
Total electricity consumed (grid + non grid)	30,201	-7,960	126%
Electricity renewables	38,201	0	
Residual electricity	-8,000	-7,960	
Exported on-site generated electricity	0	0	
Emissions (kgCO ₂ -e)		0	
Total renewables (grid and non-grid)	126.49%		
Mandatory	18.59%		
Voluntary	107.90%		
Behind the meter	0.00%		
Residual electricity emissions footprint (tCO₂-e)	0		

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

Location-based approach summary

Location-based approach	Activity data (kWh)	Scope 2 emissions (kgCO ₂ -e)	Scope 3 emissions (kgCO ₂ -e)
NSW	18,961	14,790	1,327
TAS	11,240	1,574	225
Grid electricity (scope 2 and 3)	30,201	16,363	1,552
NSW	0	0	0
TAS	0	0	0
Non-grid electricity (Behind the meter)	0	0	0
Total electricity consumed	30,201	16,363	1,552
Emissions footprint (tCO₂-e)	18		
<i>Scope 2 emissions (tCO₂-e)</i>	16		
<i>Scope 3 emissions (tCO₂-e)</i>	2		

Climate Active carbon neutral electricity summary

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

Climate Active carbon neutral electricity is not renewable electricity. The emissions have been offset by another Climate Active member through their product 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
Base building refrigerants	Emissions for refrigerants are deemed to be immaterial

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**).

There are no emission sources for this certification in this reporting period that are categorised as attributable (excluded).

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
Operations of prepaid points of presence where [brand] SIM cards sold (e.g. supermarkets, petrol stations, etc.)	N	N	N	N	N	SIM cards are sold directly from felix and not sold within supermarkets, petrol stations or any other location. Therefore, there are no emissions from this category that is relevant to the service.



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