



# **PUBLIC DISCLOSURE STATEMENT**

**GPG MANAGEMENT PTY LTD**

**ORGANISATION CERTIFICATION**


**CY2022**

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



An Australian Government Initiative



NAME OF CERTIFIED ENTITY	GPG Management Pty Ltd (trading as Gurner TM)
REPORTING PERIOD	1 January 2022 – 31 December 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>James Roberts Chief Projects Officer 17 July 2023</p>



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

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Version March 2023.



# 1. CERTIFICATION SUMMARY

TOTAL EMISSIONS OFFSET	<b>379.63 tCO<sub>2</sub>-e</b>
OFFSETS USED	100% ACCUs
RENEWABLE ELECTRICITY	18.64%
CARBON ACCOUNT	Prepared by: Ark Resources
TECHNICAL ASSESSMENT	22 November 2023 Mike Rainbow Ark Resources Next technical assessment due: with CY2025 report
THIRD PARTY VALIDATION	Type 1 24 May 2023 GPP Audit Pty Limited

## Contents

1. Certification summary.....	3
2. Carbon neutral information .....	4
3. Emissions reductions.....	8
4. Emissions summary.....	9
5. Carbon offsets .....	11
7. Renewable Energy Certificate (REC) Summary .....	13
Appendix A: Additional Information .....	14
Appendix B: Electricity summary .....	16
Appendix C: Inside emissions boundary .....	20
Appendix D: Outside emissions boundary .....	21

## 2. CARBON NEUTRAL INFORMATION

### Description of certification

The certification is for the Australian business operations of GPG Management Pty Ltd (trading as GURNER™), ABN: 64 754 223 432. The certification year and base year is the 2022 calendar year.

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.

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

- Climate Active Standards
- The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
- National Greenhouse and Energy Reporting (Measurement) Determination 2008.

Where possible, the calculation methodologies and emission factors used in this inventory are derived from the National Greenhouse Accounts (NGA) Factors in accordance with "Method 1" from the National Greenhouse and Energy Reporting (Measurement) Determination 2008.

The greenhouse gases considered within the inventory are those that are commonly reported under the Kyoto Protocol; carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O) and synthetic gases - hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) sulfur hexafluoride (SF<sub>6</sub>) and nitrogen trifluoride (NF<sub>3</sub>). These have been expressed as carbon dioxide equivalents (CO<sub>2</sub>-e) using relative global warming potentials (GWPs).

### Organisation description

In 2013, GURNER™ was established by Tim Gurner to take luxury lifestyle and property development to the next level. GURNER™ became a brand that would inspire imagination, delivering innovative, design-led experiences.

Eight years on and GURNER™ has built much more than reputation. Our successful track record is a result of the team's skilful determination and passionate heart, underpinned by family values and a united commitment to excellence.

Today, GURNER™ is a trusted, progressive, and nimble team, pushing new boundaries and challenging the norm, never satisfied by the status quo.

Our mission is to deliver excellence without compromise. From stunning residential homes to intelligent

*“GURNER™ is committed to maintaining a high level of environmental sustainability, consistent with our philosophy to deliver only the finest residences.”*

mixed-use precincts to world-class retail and hospitality, we take architecture, interior design, landscaping, and lifestyle to new dimensions. Every endeavour results in spaces that are intrinsically beautiful, a flawless union of form and function.

We believe people deserve to live in spaces that inspire and energise. This ethos steers everything we do. We create homes to not only live in, but to love – spaces that evoke emotion and nurture connection. We strive to consistently raise the benchmark for luxury lifestyle in Australia.

Our offices during this period were located at 168 Williams Road Prahran VIC, 508 Malvern Road Prahran VIC and we added operations from 7-13 Elizabeth Street Paddington NSW. From June 2022 we also added operations from Office 509, 80 Ann Street Brisbane QLD.

## 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  
Construction materials and services  
Electricity  
Food  
ICT services and equipment  
Office equipment & supplies  
Refrigerants  
Stationary energy  
Transport (Air)  
Transport (Land and sea)  
Waste  
Water  
Working from home

### Non-quantified

Cleaning and Chemicals

## Outside emission boundary

### Excluded

Professional services  
Employee commuting

## 4. EMISSIONS REDUCTIONS

### Emissions reduction strategy

Gurner™ commits to reducing overall Scope 1, 2 and 3 emissions from all sources by 20% by 2028, from a 2022 base year. To achieve this reduction;

- Gurner™ commits to reducing Scope 3 emissions from waste by 50% by 2025, from a 2022 base year.
- Gurner™ commits to reducing Scope 2 and 3 emissions from electricity by 25% by 2027, from a 2022 base year.
- Gurner™ commits to reducing Scope 3 emissions from office equipment and supplies by 25% by 2025, from a 2022 base year.

In addition to the above commitments, GURNER™ will look to further reduce our emissions through implementation of the following emissions reduction strategies:

- Reducing emissions from electricity through energy conservation (i.e. reminding staff to turn off lights, HVAC, etc. when leaving meeting rooms and the office in general for the evening).
- Investigate the purchase of 100% Green Power for our subsidiary offices.
- Continue to minimize use of natural gas consuming items.
- Reducing our emissions from air and land transportation via the following:
  - Attending meetings remotely rather than travelling.
  - Utilising public transport, cycling or walking to meetings where meeting venues are close by.
  - Implement a policy to ensure that flights are offset at point of purchase.
- Implement a policy to limit the amount of printing in order to limit costs.
- Implement a policy to prioritise purchase on Carbon Neutral certified office supplies products and catering.

### Emissions reduction actions

We have taken the following actions to reduce our emissions:

- Limited our natural gas consumption through reducing the amount of time we use gas for heating, etc.
- Purchasing carbon neutral certified paper.
- Reduced emissions from food & catering by reducing catering consumption.



## 5. EMISSIONS SUMMARY

### Emissions over time

Emissions since base year		Total tCO <sub>2</sub> -e (without uplift)	Total tCO <sub>2</sub> -e (with uplift)
Base year/Year 1:	CY2020	88.28	n/a
Year 2:	CY2021	119.03	n/a
Base year/Year 3:	CY2022	371.64	379.63

The initial base year calculation was performed during the peak of the COVID-19 pandemic, which significantly skewed the results. The initial base year (CY2020) had total emissions of 88.28 tCO<sub>2</sub>-e. The current year emissions (CY2022) is 371.51 tCO<sub>2</sub>-e and the growth in emissions is not commensurate with the small expansion of the company, therefore it is necessary to establish a new base year.

### Significant changes in emissions

The overall significant increase in emissions is a result of a reduction in the impacts of COVID-19 on business operations, as well as the expansion into a third and fourth office.

Emission source name	Previous year emissions (t CO <sub>2</sub> -e)	Current year emissions (t CO <sub>2</sub> -e)	Detailed reason for change
Non-residential building construction and interior finishing	0	37.38	Business expansion - Gurner opened two new offices requiring initial fitout.
Electricity (scope 2 & 3)	46.50	115.73	Business expansion into 3rd and 4th offices, and reduction in impacts of COVID-19.
Air transport	0.93	50.72	Reduction in impacts of COVID-19, and interstate travel required to attend new offices in QLD and NSW.
Waste (paper and cardboard)	0.00	37.52	Waste reporting method has improved allowing correct attribution of waste types.

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

GPG Management purchases Opal Australia Paper's Reflex carbon neutral certified paper.

## Emissions summary

The electricity summary is available in Appendix B. Electricity emissions were calculated using a market-based approach.

Emission category	Sum of scope 1 (tCO <sub>2</sub> -e)	Sum of scope 2 (tCO <sub>2</sub> -e)	Sum of scope 3 (tCO <sub>2</sub> -e)	Sum of total emissions (t CO <sub>2</sub> -e)
Accommodation and facilities	0.00	0.00	3.06	3.06
Construction Materials and Services	0.00	0.00	37.38	37.38
Electricity	0.00	102.21	13.53	115.73
Food	0.00	0.00	9.09	9.09
ICT services and equipment	0.00	0.00	7.50	7.50
Office equipment & supplies	0.00	0.00	71.96	71.96
Refrigerants	1.11	0.00	0.00	1.11
Stationary Energy (gaseous fuels)	1.84	0.00	0.35	2.20
Transport (Air)	0.00	0.00	50.72	50.72
Transport (Land and Sea)	0.00	0.00	8.36	8.36
Waste	0.00	0.00	62.08	62.08
Water	0.00	0.00	1.98	1.98
Working from home	0.00	0.00	0.47	0.47
<b>Total</b>	<b>2.95</b>	<b>102.21</b>	<b>266.48</b>	<b>371.64</b>

## Uplift factors

An uplift factor is an upwards adjustment to the total carbon inventory to account for relevant emissions that cannot be reasonably quantified or estimated. This conservative accounting approach helps ensure the integrity of the carbon neutral claim.

Reason for uplift factor	tCO <sub>2</sub> -e
A 15% uplift was applied to Transport (air) emissions because air travel was partly estimated.	7.61
An uplift of 350 kg CO <sub>2</sub> -e was added to account for an estimated purchase of \$500 of cleaning chemicals.	0.35
A 25% uplift was applied to water emissions for the Sydney and Brisbane offices, because water usage was estimated.	0.03
Total of all uplift factors	7.99
<b>Total footprint to offset</b> <i>(total net emissions from summary table + total uplifts)</i>	<b>379.63</b>

## 6. CARBON OFFSETS

### Offsets retirement approach

This certification has taken an in-arrears offsetting approach. The total emission to offset is 379.63 t CO<sub>2</sub>-e. The total number of eligible offsets used in this report is 380. Of the total eligible offsets used, 4 were previously banked and 380 were newly purchased and retired. 4 are remaining and have been banked for future use.

### Co-benefits

#### Wulburjubur Cultural Fire Project

Fire management near the most northern point of Australia on the Wulburjubur Bama Land Trust, Cape York Peninsula, is delivering a valuable income stream for the Western Yalanji Aboriginal Corporation RNTBC (WYAC). The Wulburjubur Cultural Fire Project involves strategic fire management, including aerial and ground burning as well as fire suppression to reduce late dry-season wildfires, in turn decreasing carbon emissions.

The project is undertaken by the Western Yalanji Traditional Owners, implementing early dry season cultural burning of savannah areas. The project creates increased employment opportunities within the Western Yalanji Ranger team through the sale of Australian Carbon Credit Units (ACCU). The cultural burning promotes increased biodiversity, which contributes to the restoration of healthy country. Western Yalanji country holds many significant rock art galleries which are protected when the country is cared for correctly and traditional fire is used to keep the rock art safe.

#### Woodlands Station Regeneration Project

This project provides diversification of income and therefore are the enabler to negate the need to over graze marginal and ecologically sensitive landscapes. Widespread land clearing has significantly impacted local ecosystems. This degradation and loss of biomass threatens the food and habitat to which native fauna rely. Historical forest clearing practices have encouraged weeds and invasive animals to thrive.

Enabling forest regeneration contributes greatly to reducing greenhouse gas emissions and therefore arresting climate change. These projects host a diverse number of endemic plant species which provide critical habitat for native fauna. Additional activities being undertaken include feral animal control, noxious weed management, erosion control and artesian water management initiatives. Our projects aim to deliver sustainable landscapes that restore a health environmental balance between agriculture and conservation.

## 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 retired (tCO <sub>2</sub> -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 (%)
Wulburjubur Cultural Fire Project	ACCU	ANREU	5 June 2023	8,357,017,873 – 8,357,018,034	2022-23	0	162	0	0	162	43%
Woodlands Station Regeneration Project	ACCU	ANREU	14 July 2023	8,351,224,858 – 8,351,225,075	2022-23	0	218	0	0	218	57%
<b>Total eligible offsets retired and used for this report</b>										380	
<b>Total eligible offsets retired this report and banked for use in future reports</b>									4		
Type of offset units		Eligible quantity (used for this reporting period)					Percentage of total				
Australian Carbon Credit Units (ACCU)		380					100%				

## 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>	N/A
<b>2. Other RECs</b>	N/A

\* 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	Project location	Eligible unit type	Registry	Surrender date	Accreditation code	Certificate serial number	Generation year	Fuel source	Quantity (MWh)
-	-	-	-	-	-	-	-	-	-
<b>Total LGCs surrendered this report and used in this report</b>									

# APPENDIX A: ADDITIONAL INFORMATION

At GURNER™, we strive to be a responsible, aspirational lifestyle and design brand. As we create opportunities for people to live their best lives, we carefully consider our potential impact.

Our Environmental and Social Governance (ESG) position illustrates a measurable commitment to a more sustainable real estate industry, in the interest of our loyal customers, our communities and the environment. Our main ESG pillars are:

- Fighting Climate Change
- Conserving Natural Resources
- Social Inclusion and Diversity
- Supporting our Communities
- Our People
- Trusted Partnerships

## Retirement Certificates

The screenshot displays the ANREU website interface. The main content area is titled "Transaction Details" and shows a "Transaction Successfully Approved" notification. The transaction ID is AU27693, with a current status of "Completed (4)". The status date is 05/06/2023 12:56:54 (AEST), and the transaction type is "Cancellation (4)". The transaction initiator and approver are both listed as "Foley, Rowan Paul Bulmer". A comment states: "These offset units have been cancelled on behalf of GPG Management Pty Ltd to meet its carbon neutral claim against the Climate Active Carbon Neutral Standard for CY2022".

Below the transaction details, there are sections for "Transferring Account" and "Acquiring Account". The transferring account is AU-2798, held by Aboriginal Carbon Fund Limited. The acquiring account is AU-1068, held by Commonwealth of Australia.

A "Transaction Blocks" table is also visible, with the following data:

Party	Type	Transaction Type	Original CP	Current CP	EBE Project ID	NGER Facility ID	NGER Facility Name	Safeguard	Kyoto Project #	Vintage	Expiry Date	Serial Range	Quantity
AU	KACCU	Voluntary ACU Cancellation			ERE165483					2022-23		8,357,017,873 - 8,357,018,034	162

At the bottom of the page, there is a "Transaction Status History" section with columns for "Status Date" and "Status Code".

- ANREU Home
- Account Holders
- Accounts
- Unit Position Summary
- Projects
- Transaction Log
- CER Notifications
- Public Reports
- My Profile

**Transaction Details**

Transaction details appear below:

**Transaction Successfully Approved**

Transaction ID	AU28468
Current Status	Completed (4)
Status Date	14/07/2023 10:15:25 (AEST) 14/07/2023 00:15:25 (GMT)
Transaction Type	Cancellation (4)
Transaction Initiator	Dobbs, Ian Alexander
Transaction Approver	Dobbs, Ian Alexander
Comment	These offset units have been cancelled on behalf of GPG Management PTY LTD to meet its carbon neutral claim against the Climate Active Carbon Neutral Standard for CY2022.

**Transferring Account**

Account Number	AU-3255
Account Name	Tasman Environmental Markets Australia Pty Ltd
Account Holder	Tasman Environmental Markets Australia Pty Ltd

**Acquiring Account**

Account Number	AU-1008
Account Name	Australia Voluntary Cancellation Account
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
AU	KACCU	Voluntary ACCU Cancellation			<a href="#">ERF165168</a>					2022-23		8.351.224.858 - 8.351.225.075	218

## 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 CO2-e)	Renewable Percentage 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)	0	0	0%
GreenPower	0	0	0%
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)	27,764	0	19%
Residual Electricity	121,186	115,732	0%
<b>Total renewable electricity (grid + non grid)</b>	<b>27,764</b>	<b>0</b>	<b>19%</b>
<b>Total grid electricity</b>	<b>148,950</b>	<b>115,732</b>	<b>19%</b>
<b>Total electricity (grid + non grid)</b>	<b>148,950</b>	<b>115,732</b>	<b>19%</b>
Percentage of residual electricity consumption under operational control	100%		
<b>Residual electricity consumption under operational control</b>	<b>121,186</b>	<b>115,732</b>	
Scope 2	107,021	102,205	
Scope 3 (includes T&D emissions from consumption under operational control)	14,165	13,527	
<b>Residual electricity consumption not under operational control</b>	<b>0</b>	<b>0</b>	
Scope 3	0	0	

<b>Total renewables (grid and non-grid)</b>	<b>18.64%</b>
<b>Mandatory</b>	<b>18.64%</b>
<b>Voluntary</b>	<b>0.00%</b>
<b>Behind the meter</b>	<b>0.00%</b>
<b>Residual scope 2 emissions (t CO2-e)</b>	<b>102.21</b>
<b>Residual scope 3 emissions (t CO2-e)</b>	<b>13.53</b>
<b>Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO2-e)</b>	<b>102.21</b>
<b>Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO2-e)</b>	<b>13.53</b>
<b>Total emissions liability (t CO2-e)</b>	<b>115.73</b>

Figures may not sum 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 <sub>2</sub> -e)	Scope 3 Emissions (kgCO <sub>2</sub> -e)	(kWh)	Scope 3 Emissions (kgCO <sub>2</sub> -e)
ACT	0	0	0	0	0	0
NSW	39,794	39,794	29,050	2,388	0	0
SA	0	0	0	0	0	0
VIC	105,031	105,031	89,276	7,352	0	0
QLD	4,125	4,125	3,011	619	0	0
NT	0	0	0	0	0	0
WA	0	0	0	0	0	0
TAS	0	0	0	0	0	0
<b>Grid electricity (scope 2 and 3)</b>	<b>148,950</b>	<b>148,950</b>	<b>121,337</b>	<b>10,359</b>	<b>0</b>	<b>0</b>
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		
<b>Non-grid electricity (behind the meter)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>		
<b>Total electricity (grid + non grid)</b>	<b>148,950</b>					

Residual scope 2 emissions (t CO <sub>2</sub> -e)	121.34
Residual scope 3 emissions (t CO <sub>2</sub> -e)	10.36
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO <sub>2</sub> -e)	121.34
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO <sub>2</sub> -e)	10.36
<b>Total emissions liability</b>	<b>131.70</b>

### 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 <sub>2</sub> -e)
n/a	0	0
<p><i>Climate Active carbon neutral electricity is not renewable electricity. These electricity emissions have been offset by another Climate Active member through their building or precinct certification. This electricity consumption is also included in the market based and location based summary tables. Any electricity that has been sourced as renewable electricity by the building/precinct under the market based method is outlined as such in the market based summary table.</i></p>		

### Climate Active carbon neutral electricity products

Climate Active carbon neutral product used	Electricity claimed from Climate Active electricity products (kWh)	Emissions (kg CO <sub>2</sub> -e)
<i>Enter name of Climate Active Carbon Neutral electricity product</i>	0	0
<i>Enter name of Climate Active Carbon Neutral electricity product</i>	0	0
<i>Enter name of Climate Active Carbon Neutral electricity product</i>	0	0
<i>Enter name of Climate Active Carbon Neutral electricity product</i>	0	0
<p><i>Climate Active carbon neutral electricity is not renewable electricity. These electricity emissions have been offset by another Climate Active member through their electricity product certification. This electricity consumption is also included in the market based and location-based summary tables. Any electricity that has been sourced as renewable electricity by the electricity product under the market-based method is outlined as such in the market based summary table.</i></p>		

# 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
Cleaning & chemicals	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.

## Excluded emissions sources summary

Emission sources tested for relevance	Size	Influence	Risk	Stakeholders	Outsourcing	Justification
Professional services	No	No	No	No	No	<p><b>Size:</b> The emissions source is likely to be between 1 and 2 t-CO<sub>2</sub>-e, which is not large compared to the total emissions from electricity, stationary energy and fuel emissions (118 t-CO<sub>2</sub>-e).</p> <p><b>Influence:</b> We do not have the potential to influence the emissions from this source, including by shifting to a different lower-emissions supplier for our business.</p> <p><b>Risk:</b> There are no relevant laws or regulations that apply to limit emissions specifically from this source, the source does not create supply chain risks, and it is unlikely to be of significant public interest.</p> <p><b>Stakeholders:</b> Key stakeholders, including the public, are unlikely to consider this a relevant source of emissions for our business.</p> <p><b>Outsourcing:</b> We have not previously undertaken this activity within our emissions boundary and comparable organisations do not typically undertake this activity within their boundary.</p>
Employee commuting	Yes	No	No	No	No	<p><b>Influence:</b> e.g., We do not have the potential to influence the emissions from this source, including by shifting to a different lower-emissions supplier for our business.</p> <p><b>Risk:</b> e.g., There are no relevant laws or regulations that apply to limit emissions specifically from this source, the source does not create supply chain risks, and it is unlikely to be of significant public interest.</p> <p><b>Stakeholders:</b> e.g., Key stakeholders, including the public, are unlikely to consider this a relevant source of emissions for our business.</p> <p><b>Outsourcing:</b> e.g., We have not previously undertaken this activity within our emissions boundary and comparable organisations do not typically undertake this activity within their boundary.</p>

The following emissions sources have been excluded:

- Professional services and employee commuting have been excluded as they have been assessed as not relevant according to the relevance test.



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