



PUBLIC DISCLOSURE STATEMENT

FELIX MOBILE

**PRODUCT CERTIFICATION
BRIDGING REPORT CY2022**

Australian Government
Climate Active
Public Disclosure Statement



An Australian Government Initiative



NAME OF CERTIFIED ENTITY	TPG Telecom Limited – Trading as felix mobile
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><i>Paul Tierney</i></p> <hr/> <p>Paul Tierney General Manager 20/11/23</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	1431 tCO ₂ -e
THE OFFSETS USED	100% VCUs
RENEWABLE ELECTRICITY	100%
CARBON ACCOUNT	Prepared by: South Pole
TECHNICAL ASSESSMENT	14/06/2023 South Pole Next technical assessment due: CY 2025

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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 Product certification is for the provision of access to the mobile network for felix customers. This product includes the operation and maintenance of the mobile network and the production, distribution and end-of-life for the SIM cards which are used by felix customers to access the network.

The scope of this product certification includes:

- TPG Telecom Limited mobile network construction and maintenance
- the operation of TPG Telecom Limited re-owned and shared mobile network assets
- the use of network assets owned and operated by third parties, including outgoing data roaming
- materials and manufacturing of SIM cards and packaging
- upstream and downstream freight of SIM cards and packaging
- SIM card warehousing
- end-of-life for SIM cards and packaging.

The functional unit for this product certification is: 6 months of access to mobile 3G,4G and 5G voice and data for one felix customer - excluding customer device and associated use.

Felix was originally reporting on a financial year basis, this report is a bridging report to convert felix to a calendar year reporting cycle. The emissions within this certificate only relate to 6 months of emissions from 1st July 2022 – 31st December 2022. The remaining emissions were already covered and offset in previous certification.

Product 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 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.

felix has both a product and service Climate Active certification. The product certification is deemed to be the child 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*.

felix does not 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_{2e} per customer connected to the mobile 3G, 4G and 5G voice and data network, calculated based on the average number of felix customers connected to the mobile network for the reporting year.

The product certification is full coverage and includes emissions from cradle-to-grave.

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' of a product or service. These attributable processes are services, materials and energy flows that become the product or service, make the product or service and carry the product or service through its life cycle. These attributable emissions 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

Network fuels (incl. well-to-tank emissions)
Network electricity (incl. transmission and distribution losses)
Data roaming to other networks by felix customers
SIM card materials and packaging
SIM card production
SIM card upstream transport
SIM card downstream freight to customers
Network construction
Network maintenance
Network decommissioning
SIM card and network warehousing
SIM card and packaging end-of-life
Network water (reticulated water supply and treatment)

Non-quantified

Network refrigerants
Initial embodied emissions in mobile phone network

Optionally included

Outside emission boundary

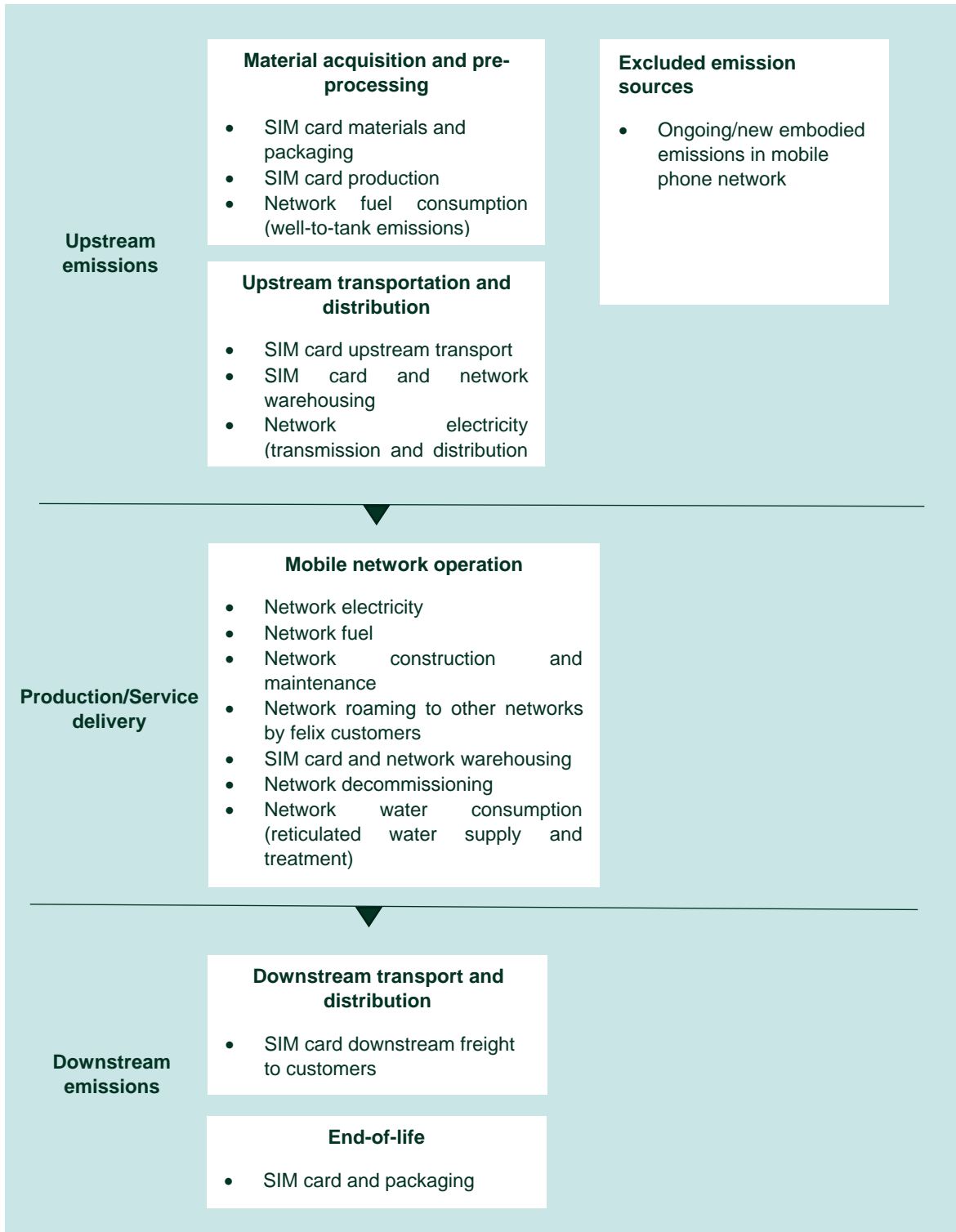
Non-attributable

Customer use of mobile handsets

Third party servers hosting websites/data accessed by felix customers

Disposal of mobile network assets

Product process diagram



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 has 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 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 were developed and submitted to the SBTi in December and are expected to be validated in 2023. 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 MobileMuster 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 5.37 tCO₂-e for the office-based activities and 731.38 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	510	0.051
Year 1: (projected)	FY 2020 - 21	1275	0.051
Year 1:	FY 2020 - 21	160	0.033
Year 2:	FY 2021 - 22	2553	0.062
Year 3:	CY2022	1430	0.030

Significant changes in emissions

This report is a bridging report that only covers the 6 months of emissions between July – December. Understanding the significant changes is not representative between the two reporting periods.

Emission source name	Previous year emissions (t CO ₂ -e)	Current year emissions (t CO ₂ -e)	Detailed reason for change
Network Construction	2483	1393	Emissions only consider 6 months of a reporting period due to this being a bridging report

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

felix used South Pole as a consultancy to help produce the inventory and product disclosure statement. felix is also headquartered in a Climate Active certified building.

Certified brand name	Product or Service used
South Pole	Consultancy service
177 Pacific Highway, North Sydney	Building

Emissions summary

Stage	tCO2-e
Stationary combustion fuels (including well-to-tank emissions)	1.48
Network electricity (including transmission and distribution losses)	0.00
Network construction	1392.46
Network maintenance	24.44
Network water	0.19
SIM card warehousing	1.65
Data roaming to other networks by felix customers	1.56
SIM card materials and packaging	0.00
SIM card production	0.00
SIM card upstream transport	0.00
SIM card downstream freight to customers / stores	8.61
SIM card materials and packaging end-of-life	0.00
Total Net Emissions	1430.40

Emissions intensity per functional unit	0.030
Number of functional units to be offset	48,377
Total emissions to be offset	1431

6. CARBON OFFSETS

Offsets retirement approach

This certification has taken an in-arrears offsetting approach. The total emission to offset is 1,431 t CO₂-e. The total number of eligible offsets used in this report is 1,431. Of the total eligible offsets used, 0 were previously banked and 1,431 were newly purchased and retired. 12 are remaining and have been banked for future use.

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 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 (%)
Southern Cardamom REDD+ Project	VCU	Verra	24 May 2023	6829-349019471-349021039-VCU-006-MER-KH-14-1748-01012015-31122015-1	2015		1569	126*	12	1,431	100%
Total offsets retired this report and used in this report										1,431	
Total offsets retired this report and banked for future reports									12		

Type of offset units	Eligible quantity (used for this reporting period)	Percentage of total
Verified Carbon Units (VCUs)	1,431	100%

* 126 credits were used for the service certifications for felix mobile

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.

Project supported by LGC purchase	Project location	Eligible unit type	Registry	Surrender date	Accreditation code	Certificate serial number	Generation year	Fuel source	Quantity (MWh)
1. Large-scale Generation certificates (LGCs)*									1,021
Ecovantage Pty Ltd	QLD, Australia	LGC	REC Registry	09 June 2023	SRPVQLO2	288-508	2021	Solar	221
Ecovantage Pty Ltd	WA, Australia	LGC	REC Registry	09 June 2023	SRPVWAE4	389-442	2022	Solar	54
Ecovantage Pty Ltd	Vic, Australia	LGC	REC Registry	09 June 2023	SRPVVCM3	581-598	2022	Solar	18
Ecovantage Pty Ltd	SA, Australia	LGC	REC Registry	09 June 2023	SRPVSA A1	4,636-5,194	2022	Solar	559
Ecovantage Pty Ltd	QLD, Australia	LGC	REC Registry	09 June 2023	SRPVQLF2	1232-1400	2022	Solar	169
Total LGCs surrendered this report and used in this report									1,008 ¹

¹ 13 MWh is used for the service certification

APPENDIX A: ADDITIONAL INFORMATION

N/A

APPENDIX B: ELECTRICITY SUMMARY

There are two international best-practice methods for calculating electricity emissions – the location-based method and the market-based method. Reporting electricity emissions under both methods is called dual reporting.

Dual reporting of electricity emissions is useful, as it provides different perspectives of the emissions associated with a business's electricity usage.

Location-based method

The location-based method provides a picture of a business's electricity emissions in the context of its location, and the emissions intensity of the electricity grid it relies on. It reflects the average emissions intensity of the electricity grid in the location (State) in which energy consumption occurs. The location-based method does not allow for any claims of renewable electricity from grid-imported electricity usage.

Market-based method

The market-based method provides a picture of a business's electricity emissions in the context of its renewable energy investments. It reflects the emissions intensity of different electricity products, markets and investments. It uses a residual mix factor (RMF) to allow for unique claims on the zero emissions attribute of renewables without double-counting.

For this certification, electricity emissions have been set by using the market-based approach.

Market Based Approach Summary			
Market Based Approach	Activity Data (kWh)	Emissions (kg CO2-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)	1,008,000	0	80%
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)	18,648	0	1%
Jurisdictional renewables (LRET) (applied to ACT grid electricity)	4,689	0	0%
Large Scale Renewable Energy Target (applied to grid electricity only)	230,445	0	18%
Residual Electricity	-332	-317	0%
Total renewable electricity (grid + non grid)	1,261,783	0	100%
Total grid electricity	1,261,451	0	100%
Total electricity (grid + non grid)	1,261,451	0	100%
Percentage of residual electricity consumption under operational control	100%		
Residual electricity consumption under operational control	-332	-317	
Scope 2	-293	-280	
Scope 3 (includes T&D emissions from consumption under operational control)	-39	-37	
Residual electricity consumption not under operational control	0	0	
Scope 3	0	0	

Total renewables (grid and non-grid)	100.03%
Mandatory	18.64%
Voluntary	81.39%
Behind the meter	0.00%
Residual scope 2 emissions (t CO2-e)	-0.28
Residual scope 3 emissions (t CO2-e)	-0.04
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO2-e)	0.00
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO2-e)	0.00
Total emissions liability (t CO2-e)	0.00

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 (kg CO2-e)	Scope 3 Emissions (kg CO2-e)	(kWh)	Scope 3 Emissions (kg CO2-e)
ACT	25,156	25,156	18,364	1,509	0	0
NSW	456,715	456,715	333,402	27,403	0	0
SA	225,607	225,607	56,402	18,049	0	0
VIC	10,517	10,517	8,940	736	0	0
QLD	5,971	5,971	4,359	896	0	0
NT	132,959	132,959	71,798	9,307	0	0
WA	290,264	290,264	148,035	11,611	0	0
TAS	114,260	114,260	19,424	1,143	0	0
Grid electricity (scope 2 and 3)	1,261,451	1,261,451	660,724	70,653	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)	1,261,451					

Residual scope 2 emissions (t CO2-e)	660.72
Residual scope 3 emissions (t CO2-e)	70.65
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO2-e)	660.72
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO2-e)	70.65
Total emissions liability (t CO2-e)	731.38

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 CO2-e)
177 Pacific Highway, North Sydney, NSW, 2060	3,967	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>		

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
Initial embodied emissions in mobile phone network	Emissions are immaterial
Network refrigerants	Emissions are immaterial as it does not hit the threshold for TPG to calculate under the NGERs scheme

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**).

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 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
Customer use of mobile handsets	N	N	N	N	N	<p>Size: Emissions are likely to be small compared to the electricity use for the network</p> <p>Influence: felix cannot influence an individual's use of a handset</p> <p>Risk: Emissions won't significantly impact the greenhouse gas risk since felix does not sell individual handsets</p> <p>Stakeholders: Stakeholders to not view this as a relevant emission source</p> <p>Outsourcing: These emissions were not outsourced previously</p>
Third party servers hosting websites/data accessed by felix customers	N	N	N	N	N	<p>Size: emissions are likely to be small compared to the electricity use for the network</p> <p>Influence: felix cannot influence these emissions as outside of their control</p> <p>Risk: Emissions are a low risk since outside of operational control of felix</p> <p>Stakeholders: Emissions are not considered relevant by stakeholders</p> <p>Outsourcing: Activities were never within organisations boundary</p>
Disposal of mobile network assets	N	N	N	N	N	<p>Size: Emissions are likely to be small compared to the electricity use for the</p> <p>Influence: felix cannot influence how a customer disposed their phones</p> <p>Risk: Emissions won't significantly impact the greenhouse gas risk since felix does not sell individual handsets</p> <p>Stakeholders: Emissions are not considered relevant by stakeholders</p> <p>Outsourcing: Activities were never within organisations boundary</p>



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