

# PUBLIC DISCLOSURE STATEMENT

HAMMONS HOLDINGS PTY LTD -TRADING AS SCENIC WORLD BLUE MOUNTAINS AUSTRALIA

**SERVICE CERTIFICATION** 

### Australian Government

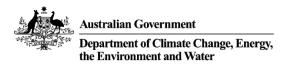
# Climate Active Public Disclosure Statement







NAME OF CERTIFIED ENTITY	Hammons Holdings Pty Ltd (Trading as Scenic World Blue Mountains Australia)
REPORTING PERIOD	1 January 2022 – 31 December 2022 Arrears report
DECLARATION	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.
	Anthea Hammon Managing Director 5 December 2023



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Version March 2023.



## 1.CERTIFICATION SUMMARY

TOTAL EMISSIONS OFFSET	4,488 t CO <sub>2</sub> -e
THE OFFSETS USED	78% VCU 22% VER
RENEWABLE ELECTRICITY	100%
CARBON ACCOUNT	Prepared by: 100% Renewables Pty Ltd
TECHNICAL ASSESSMENT	Prepared by: 100% Renewables Pty Ltd  27 July 2023 100% Renewables Pty Ltd Next technical assessment due: CY 2025

### Contents

1.	Certification summary	3
2.	Carbon neutral information	4
3.	Emissions boundary	5
4.	Emissions reductions	8
5.	Emissions summary	9
6.	Carbon offsets	.11
7. Re	enewable Energy Certificate (REC) summary	.15
Арр	endix A: Additional information	.16
Арр	endix B: Electricity summary	.17
Арр	endix C: Inside emissions boundary	.20
Арр	endix D: Outside emission boundary	22



## 2. CARBON NEUTRAL INFORMATION

## **Description of certification**

The emission inventory in this Public Disclosure Statement for the calendar year 2022 with the same year as the baseline year has been developed in accordance with the Climate Active Carbon Neutral Standard for Services. Greenhouse gas (GHG) emissions within Scenic World's operational control relevant to offered services have been captured in this certification.

## **Service description**

This PDS covers all services offered by Scenic World Blue Mountains Australia, located in Corner Violet Street & Cliff Drive Katoomba NSW Australia and is included in Hammons Holdings Pty Ltd's portfolio of companies. The functional unit is kg CO<sub>2</sub>-e per visitor to Scenic World Blue Mountains Australia. This is a full coverage service certification inclusive of all services and is provided based on the cradle-to-grave life cycle assessment.



## 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**

Natural gas

Stationary & fleet fuel

Lubricants and greases

Electricity

IT software & hardware

Telecommunications

Printing & stationery

Infrastructure upgrades

Cleaning services

Accounting services

Advertising services

Banking services

**Business services** 

Education

Insurance services

Legal services

Security and personal safety

Subscriptions & periodicals

Horticultural services

Postage and courier

Machinery repairs

Motor vehicle parts &

maintenance

Plant leasing services

Employee commute

Working from home

Water

Food & catering (staff and

visitors)

Visitor travel &

accommodation

Staff clothing

Merchandise

Signages

Waste-to-landfill

### Non-quantified

Refrigerants (Scenic Worldowned refrigerators and freezers)

Air travel (staff)

Business accommodation (staff)

Taxis & ridesharing (staff)

Hire cars (staff)

Green waste

## Outside emission boundary

### Non-attributable

Refrigerants (3<sup>rd</sup> partyowned refrigerators and freezers)



### Service process diagram

This boundary is based on a cradle-to-grave life cycle assessment.

#### **Upstream**

- ICT equipment and services
- Office equipment (printing & stationery)
- Capital expenditures (mostly infrastructure upgrades)
- Cleaning services (3<sup>rd</sup>-party cleaning service provider)

## **Upstream** emissions

- Professional services (e.g. accounting, advertising, banking, business, education, insurance, legal, security, subscriptions & technical services)
- Postage & courier
- Industrial & machinery repairs
- Motor vehicle parts
- Motor vehicle repairs & maintenance
- Plant leasing, hiring & renting services
- Employee commute
- Working from home
- Business travel (air travel, accommodation, hire car, taxi and ridesharing)

#### Scenic World Blue Mountains admin operations & tours

- Natural gas
- Stationary fuel
- Fleet fuel
- Lubricants and greases
- Electricity
- Service delivery
- WaterFood and catering (staff and visitors)
- Visitor travel (attributable accommodation, air and ground travel)
- Merchandise (souvenirs)
- Signages

#### **Downstream**

## Downstream emissions

- Waste-to-landfill
- Green waste



## 4. EMISSIONS REDUCTIONS

## **Emissions reduction strategy**

Scenic World has a comprehensive Environmental Management Plan which includes targets to reduce our overall environmental impact and ensure our sustainability efforts are the best they can, which incorporates emissions reduction targets.

Included in the Scenic World's 2023-24 Strategy are targets to:

- Be carbon neutral through emissions reductions and purchasing offsets;
- Reduce transportation emissions (visitors and team members) as they travel to Scenic World; and ensure the accuracy of the data we capture:
- Focus on maximising waste minimisation across our site;
- Reduce our use of natural gas

The following actions have specifically been identified for this financial year:

We aim to reduce our carbon emissions by 10% per visitor over the next five years. We aim to reduce carbon emissions by 10% per visitor over the next five years. We acknowledge that a significant portion of emissions from visitor travel originates from visitor travel, which lies beyond our direct control. Nevertheless, we are fully committed to addressing and reducing emissions from all other sources within our sphere of influence.

Focus	Area	Emissions Reductions Actions	Timeline/Budget
Travel/Transport	Team Members Travel	Track Team Member commutes to establish a baseline (within 3 months) to help inform a reduction target	Base line – August 2023 Reduction – 10% less single person in car in rest of year compared to baseline
Client Customer Travel initiative	Guest transport	Encourage the use of public transport through sales of the Explore More Pass (a bus/entry combination ticket)	Increase sales by 20% compared to Q4 2022 by March 2024
Waste	Audit	Carry out waste audit to understand further areas of improvement	December 2023
	New Bins	Replace Café Bins to improve recycling and organics separation	March 2024
Equipment	Design and Fuel Source	Phase out gas fuelled equipment (particularly HVAC and kitchen)	As equipment ends its technical lifespan



## 5.EMISSIONS SUMMARY

## Use of Climate Active carbon neutral products and services

Nil

## **Emissions summary**

The following diagram is cradle-to-grave.

Emission source	tCO <sub>2</sub> -e
ICT services and equipment	75.89
Printing & stationery	34.78
Capital expenditures (mostly infrastructure upgrades)	612.34
Cleaning services	47.80
Accounting services	2.51
Advertising services	129.32
Banking services	7.73
Business services	13.69
Education	3.01
Insurance & retirement services	16.53
Legal services	4.40
Security & personal safety	3.25
Subscriptions & periodicals	2.95
Horticultural services	3.31
Postage & couriers	1.08
Industrial & machinery repairs	58.17
Motor vehicle parts	1.97
Motor vehicle repairs and maintenance	1.52
Plant leasing, hiring & equipment services	7.93



Employee commute	151.73
Working from home	0.93
Natural gas	313.53
Stationary fuel (petrol)	1.28
Stationary fuel (LPG)	0.12
Stationary fuel (petroleum-based oil)	0.06
Stationary fuel (lubricants & greases)	0.001
Fleet fuel (diesel)	3.74
Electricity	0.00
Water	17.72
Food and catering (staff & visitors)	186.59
Visitor travel and accommodation	2,017.92
Staff clothing	4.00
Merchandise	354.22
Signages	4.21
Waste-to-landfill	359.16
Total emissions before uplift	4,443.39
Uplift factors	
Reason for uplift factor	tCO₂-e
uplift of 1% to account emissions associated with refrigerants	44.43
Total of all uplift factors	44.43
Total emissions footprint to offset (total emissions from summary table + total of all uplift factors)	4,487.83

Emissions intensity per functional unit (including uplifts)	0.009
Number of functional units to be offset	493,056
Total emissions to be offset	4,487.83



## **6.CARBON OFFSETS**

### Offsets retirement approach

This certification has taken an in-arrears offsetting approach. The total emission to offset is 4,488 t CO<sub>2</sub>-e. The total number of eligible offsets used in this report is 4,488 t CO<sub>2</sub>-e. Of the total eligible offsets used, 0 t CO<sub>2</sub>-e were previously banked and 4,488 t CO<sub>2</sub>-e were newly purchased and retired. 0 t CO<sub>2</sub>-e are remaining and have been banked for future use.

#### Co-benefits

This section provides a brief description of the carbon offsets purchased and retired for Hammons Holdings Pty Ltd's carbon neutral claim.

#### Inner Mongolia Chifeng Gaofeng Wind Power Project

This project relates to 44 per cent of the total amount of offsets purchased and retired for this reporting period. The activity includes the generation of electrical energy using wind and selling the generated electricity to the respective state utilities under the Northeast China Power Grid. A total of 25 sets of 2,000 kW wind turbines (Vestas V80-2000Kw of Denmark) have been installed, providing a total capacity of 50MW. The power produced displaces an equivalent amount of power of the grid which is fed mainly by fossil fired power plants. Hence, it results in reduction of greenhouse gas emissions.

The project meets the following Sustainable Development Goals:







#### **Srepok 1 Solar Power Project**

This project relates to 22 per cent of the total amount of offsets purchased and retired for this reporting period. The activity includes the generation of electrical energy using solar energy and selling the generated electricity to the national grid of Vietnam. The Srepok 1 solar power plant has a peak capacity of 50MW. The power produced displaces an equivalent amount of power of the grid which is fed mainly by fossil fired power plants. Hence, it results in reduction of greenhouse gas emissions.

The project meets the following Sustainable Development Goals:















#### Winds of Change

This project relates to 22 per cent of the total amount of offsets purchased and retired for this reporting period. The activity includes the generation of electrical energy using wind and selling the generated electricity to the national grid of Turkey. The power produced replaces an equivalent amount of electricity from the grid, which mostly comes from fossil-fired power plants. This results in a reduction of greenhouse gas emissions.

The project meets the following Sustainable Development Goals:







#### **Katingan Peatland Conservation**

This project relates to 9 per cent of the total amount of offsets purchased and retired for this reporting period. The activity includes the protection and restoration of 149,800 hectares of threatened peatland ecosystems whilst providing and important source of income for the locals. The project area stores vast amounts of CO2 in its peat soil and aboveground

biomass, and plays a vital role in stabilizing water flows, preventing devastating peat fires, enriching soil nutrients and providing clean water. It is home to large populations of many high conservation value species, including some of the world's most threathened, such as the Bornean Orangutan (Pongo pygmaeus), the Sunda Pangolin (Manis javanica) and Proboscis Monkey (Nasalis larvatus). It is surrounded by villages for which it supports traditional livelihoods including farming, fishing, and non-timber forest products harvesting.

The project meets the following Sustainable Development Goals:

























#### **EcoAustralia Mount Sandy Conservation**

This project relates to 2 per cent of the total amount of offsets purchased and retired for this reporting period. The activity brings together indigenous and non-indigenous communities of Australia by promoting traditional land management for biodiversity conservation. This project protects a rare pocket of wetlands and woodlands between the Coorong National Park and Lake Albert. As one of the last remaining areas of native vegetation in the region, the land forms a strategic wildlife corridor and is of great significance to the Ngarrindjeri people, the indigenous local nation.

The project meets the following Sustainable Development Goals:











## 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 (%)
Inner Mongolia Chifeng Gaofeng Wind Power Project	VCU	Verra	29 Nov 2023	14205-562635259-562636258-VCS- VCU-1310-VER-CN-1-813-01012017- 31122017-0	2017	0	1,000	0	0	1,000	22%
Inner Mongolia Chifeng Gaofeng Wind Power Project	VCU	Verra	24 Nov 2023	14205-562634011-562635010-VCS- VCU-1310-VER-CN-1-813-01012017- 31122017-0	2017	0	1,000	0	0	1,000	22%
Srepok 1 Solar Power Project	VCU	Verra	29 Nov 2023	15886-722813462-722814461-VCS- VCU-842-VER-VN-1-1974-01022022- 31122022-0	2022	0	1,000	0	0	1,000	22%
Winds of Change Turkey	VER	Gold Standard	27 Nov 2023	GS1-1-TR-GS905-12-2016-684921920 - 22919	2016	0	1,000	0	0	1,000	22%
Katingan Peatland Conservation	VCU	Verra	26 Nov 2023	6359-303489333-303489720-VCU-016- APX-ID-14-1477-01012017-31122017-1	2017	0	388	0	0	388	9%
EcoAustralia Mount Sandy Conservation Stapled to						100	0				
10MW Solar One Ceylon (Pudukadumalai) Solar Power Project	VER	Gold Standard	29 Nov 2023	<u>GS1-1-LK-GS11417-21-2021-</u> <u>23195-11082-11181</u>	2021	100	100	0	0	100	2%
Total offsets retired this report and used in this report							4,488				
Total offsets retired this report and banked for future reports							0				

Type of offset units	Eligible quantity (used for this reporting period)	Percentage of total
Verified Emissions Reductions (VERs)	1,100	22%
Verified Carbon Units (VCUs)	3,388	78%



## 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)\*

\* 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)
Not applicable	-	-	-	-	-	-	-	-	-
Total LGCs surrendered this report and used in this report								Not applicable	



## APPENDIX A: ADDITIONAL INFORMATION

Attachment 1: Proof of the retirement - Mount Sandy Conservation Project

## CERTIFICATE

MOUNT SANDY CONSERVATION PROJECT

100

Australian Biodiversity Units
(150 square metres)

were purchased and retired by:

HAMMONS HOLDINGS PTY LTD CRN 1003

SERIAL NUMBERS 94368-94467

AN AUSTRALIAN BIDOIVERSITY UNIT (ABU) REPRESENTS THE PERMANENT PROTECTION OF 1.5 SQUARE METRES OF HIGH CONSERVATION VALUE NATIVE HABITAT

flato

30/11/2023

REGISTRAR CERTIFICATION

DATE

NVCR ALLOCATION REFERENCE: 2019/4003 VOL 003



## 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	Renewable
market-based approach	Activity Data (kWh)	(kgCO₂-e)	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)	0	0	0%
GreenPower	1,045,248	0	100%
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)	194,834	0	19%
Residual Electricity	-194,834	-186,067	0%
Total renewable electricity (grid + non grid)	1,240,082	0	119%
Total grid electricity	1,045,248	0	119%
Total electricity (grid + non grid)	1,045,248	0	119%
Percentage of residual electricity consumption under operational control	100%		
Residual electricity consumption under operational control	-194,834	-186,067	
Scope 2	-172,061	-164,319	
Scope 3 (includes T&D emissions from consumption under operational control)	-22,773	-21,748	
Residual electricity consumption not under operational control	0	0	
Scope 3	0	0	

Total renewables (grid and non-grid)	118.64%
Mandatory	18.64%
Voluntary	100.00%
Behind the meter	0.00%
Residual scope 2 emissions (t CO <sub>2</sub> -e)	-164.32
Residual scope 3 emissions (t CO <sub>2</sub> -e)	-21.75
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO <sub>2</sub> -e)	0.00
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO <sub>2</sub> -e)	0.00
Total emissions liability (t CO <sub>2</sub> -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	Unde	r operational	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	1,045,248	1,045,248	763,031	62,715	0	0
SA	0	0	0	0	0	0
VIC	0	0	0	0	0	0
QLD	0	0	0	0	0	0
NT	0	0	0	0	0	0
WA	0	0	0	0	0	0
TAS	0	0	0	0	0	0
Grid electricity (scope 2 and 3)	1,045,248	1,045,248	763,031	62,715	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)	1,045,248					

Residual scope 2 emissions (t CO <sub>2</sub> -e)	763.03
Residual scope 3 emissions (t CO <sub>2</sub> -e)	62.71
Scope 2 emissions liability (adjusted for already offset carbon neutral electricity) (t CO <sub>2</sub> -e)	763.03
Scope 3 emissions liability (adjusted for already offset carbon neutral electricity) (t CO <sub>2</sub> -e)	62.71
Total emissions liability	825.75

Operations in Climate Active buildings and precincts

	3		
	Operations in Climate Active buildings and precincts	Electricity consumed in Climate Active certified building/precinct (kWh)	Emissions (kg CO <sub>2</sub> -e)
ı	Not applicable	-	-
ı	Climate Active carbon neutral electricity is not renewable electricity	ty These electricity emissions have been c	offeet by another Climate

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.

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)
Not applicable	-	-

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.



## 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 <u>one</u> of the following reasons:

- 1. Immaterial <1% for individual items and no more than 5% collectively
- 2. <u>Cost effective</u> Quantification is not cost effective relative to the size of the emission but uplift applied.
- <u>Data unavailable</u> 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
Refrigerants (Scenic World-owned fridges and freezers)	Data unavailable
Air travel (staff)	Data is immaterial
Business accommodation (staff)	Data is immaterial
Taxi (staff)	Data is immaterial
Ridesharing (staff)	Data is immaterial
Hire cars (staff)	Data is immaterial
Green waste	Immaterial, green waste remains on site to decompose naturally or to form part of animal habitat

#### **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
Not applicable	-	-	-



## Data management plan for non-quantified sources

The data management plan below outlines how more rigorous quantification can be achieved for material (equal to or greater than 1%) non-quantified emission sources.

### Refrigerants

Hammons Holdings Pty Ltd will work with their staff to conduct an audit of their HVAC units and refrigerators. A record of asset type, recharge capacity and type of refrigerant gas will be included in the database and corresponding emissions will be included in the inventory in the next 3 years.



## 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. <u>Size</u> The emissions from a particular source are likely to be large relative to other attributable emissions.
- 2. <u>Influence</u> 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.
- 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 for relevance	tested	Size	Influence	Risk	Stakeholders	Outsourcing	Justification
Refrigerants (3 <sup>rd</sup> pa owned fridges and freezers)	rty-	N	N	N	N	N	Size: The emissions source is likely to be between 1% to 2% of the total carbon inventory, which is not large compared to other attributable emissions.  Influence: We do not have the potential to influence the emissions from this source, including by shifting to a different lower-emissions supplier for our product/service.  Risk: There are no relevant laws or regulations that apply to limit emissions specifically from this source, the source does not create supply chain risks, and it is unlikely to be of significant public interest.  Stakeholders: Key stakeholders, including the public, are unlikely to consider this a relevant source of emissions for our product/service.  Outsourcing: We have not previously undertaken this activity within our emissions boundary and comparable products/services do not typically undertake this activity within their boundary.





