



Ground Control

Qualifying Explanatory Statement

in support of the

Achievement of and Ongoing Commitment to Carbon Neutrality

Application Period: 01/04/2020 - 31/03/2021

Date: March 2022

1. Executive Summary

This document is the Qualifying Explanatory Statement (QES) which provides collected evidence in support of the declaration that Ground Control:

1. has achieved carbon neutrality for the organisation for the period commencing 1st April 2020 to 31st March 2021 (see Section 3); and
2. is committed to maintaining carbon neutrality for the organisation (see section 4).

The carbon neutrality declaration has been made and the collected supporting evidence has been provided in accordance with the requirements prescribed by PAS 2060:2014 – Specification for the demonstration of carbon neutrality.



Jason Knights

Ground Control Managing Director

06/04/2022

2. General information

PAS 2060 Requirement	Information Relating to the Carbon Neutral Declaration
Entity making PAS 2060 declaration:	Ground Control Ltd
Subject of PAS 2060 declaration:	Ground Control's UK sites and operations, including business travel.
Description of Subject:	<p>Ground Control's Core Purpose is 'Caring for Our Environment'. We create and maintain external spaces that are safe and enjoyable for all. We deliver of a full range of external services including Grounds Maintenance, Winter Maintenance, Landscape Construction, Rail and Utility Vegetation Management, Electric Vehicle Charging Installations and Consultancy Services. We operate within the UK, across a wide range of sectors and clients.</p> <p>We deliver external services on a Project, Planned Preventative and Reactive basis through four operational Divisions. These consist of management teams, home based contract managers, supervisors, and site-based teams. The Divisions are supported by six, predominantly office based, departments: ICT, HR, BD, Finance, HSQE and Client</p>

	<p>Services. Works are delivered on the ground by field teams and directly employed labour.</p> <p>We have defined our scope as the emissions that are directly under our control.</p>
Rationale for selection of the subject:	The entire organisation was selected to enable the full Carbon Footprint of our business operations to be quantified, verified, and certified. This gives us a recognised and credible baseline from which to develop effective carbon reduction plans and reduce our environmental impact year on year.
Control approach:	Operational Control
Type of conformity assessment:	Independent third-party certification (see Appendix 2)
Baseline date for PAS 2060 programme:	01.04.2019 – 31.03.2020
Individuals responsible for evaluation and provision of data necessary for declaration:	<p>Sophie Stephens - Head of Environment and Sustainability</p> <p>Olivia Hillman – Environmental Assistant</p>

3. Declaration of achievement to carbon neutrality

PAS 2060 Requirement	Information Relating to the Carbon Neutral Declaration
Declaration of achievement:	Carbon neutrality of the organisation achieved by Ground Control Ltd in accordance with PAS 2060 at March 2022 for the period commencing April 2020 to March 2021, certified by the Carbon Trust.
Recorded carbon footprint of the subject during the period stated above	<p>2,672 tCO₂e according to the market-based method</p> <p>See section 3.2 for further details.</p>
Carbon footprint reduction target for period (market-based)	<ul style="list-style-type: none"> • Mobile Fuel reduction - 10% intensity reduction per year, 2.2 tCO₂e/£m from 01.04.2020 • Business Travel - Reduce by 10% per year (on an intensity metric relative to revenue) from 01.04.2020 • Grey Fleet - Reduce by 5% per year (on an intensity metric relative to revenue), 0.078 tCO₂e/ £m from 01.04.2020
Carbon footprint reduction achieved for period (market-based)	<ul style="list-style-type: none"> • Mobile Fuel reduction - 21% intensity reduction tCO₂e/£m from 20.52 tCO₂e/£m FYE2020 to 16.30 tCO₂e/£m FYE2021 • Business Travel - Reduced by 71% (on an intensity metric relative to revenue) from 1.71 tCO₂e/£m FYE2020 to 0.50 tCO₂e/£m FYE2021

	<ul style="list-style-type: none"> • Grey Fleet - Reduced by 69% (on an intensity metric relative to revenue) tCO₂e/£m, from 1.56 tCO₂e/£m FYE2020 to 0.49 tCO₂e/£m in FYE2021 <p>See section 3.3 for further details.</p>
Carbon offsets purchased	<p>2, 672 (tCO₂e)</p> <p>See section 3.4 for further details.</p>

3.1. Carbon footprint methodology

PAS 2060 Requirement	Information Relating to the Carbon Neutral Declaration
<p>Description of the standard and methodology used to determine GHG emissions and reductions</p>	<p>The methodology for calculating the carbon footprint was as follows:</p> <ul style="list-style-type: none"> • Natural Gas – Meter readings are collected from supplier invoices for the consumption in kWh. • Refrigerants – Engineers report does not state any gases were lost and replaced during maintenance visit. • Other purchased fuels – Data extracted from internal expenses system; this is mostly recorded as spend rather than quantity. A data hierarchy was applied prioritising quantity where available alternatively dividing value by the average price per litre. • Owned vehicles – Litre consumption by fuel type from company fuel card provider annual report. • Electricity (buildings) – Meter readings are collated from invoices; some assumptions were made where there are data gaps but very few. For Kingfisher House, invoices are not available as the landlord manages electricity payments but provides a monthly spreadsheet of the individual meter readings. • Electricity (EVs) – Data extracted from internal expenses system where colleagues upload claims for home charging (green tariffs) and road charging (assumed non- renewable energy). • Grey fleet – Data from internal expenses system is recorded by spend which was converted to distance using the reimbursement rates per mile. Fuel type was collected from the expense receipts uploaded by colleagues. • Business travel – Data extracted from internal expenses system with destination details from receipts uploaded by colleagues. <p>This methodology was developed to be in accordance with the requirements of the GHG Protocol and verified in accordance with the ISO 14064-3 standard.</p> <p>The provisions of the methodology for calculating the carbon footprint were applied as detailed and the principles set out in PAS 2060 were met.</p>

<p>Justification for the selection of the methodologies chosen</p>	<p>The justification for calculating the carbon emissions by the methodology stated above and any assumptions made:</p> <ul style="list-style-type: none"> • Natural Gas – Meter readings are collated by the reception team, but monthly invoices are rarely missing, and these are calculated from differences in readings. • Other purchased fuels – Accuracy of the data is limited as only spend information is available rather than quantities purchased. The data hierarchy used applies an average pump price in pence/litre from the government public database. This limitation is being addressed as discussed during the site visit. • Owned vehicles – Fuel card provider collates this data on behalf of the Fleet team. • Electricity (buildings) – Meter readings are collated by the reception team, but monthly invoices are rarely missing, and these are calculated from differences in readings. • Electricity (EVs) – Where consumption in kwh is not given by colleagues in the expenses system, the reimbursement rate is used. Assumptions were made that when using public charging stations these were not supplied by green energy • Grey fleet – To calculate mileage a reimbursement rate was applied to the litres of fuel purchased and available from the expenses system. • Business travel – Journey details can sometimes not be extracted from the information on the expenses system; therefore, a rate was applied depending on the transport mode. <p>This footprint adheres to the requirement of GHG Protocol which is a respected and accepted methodology. This method was chosen as it provides internationally recognized approach to the calculation of representative product CO2e footprints and meets the requirements of PAS 2060 for the substantiation of GHG emissions (PAS 2060:2014: 5.2.2 to 5.2.4).</p>
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3.2. Carbon footprint breakdown

Carbon Footprint <i>(for latest footprinting year)</i>	Information Relating to the Carbon Neutral Declaration
Total Carbon Footprint	Location-based: 2,699.92 tCO ₂ e Market-based: 2,671.92 tCO ₂ e
Carbon Footprint Breakdown by Scope	Location-based: Scope 1: 2,547.41 tCO ₂ e Scope 2: 96.48 tCO ₂ e Scope 3: 56.03 tCO ₂ e Market-based: Scope 1: 2,547.42 tCO ₂ e Scope 2: 68.49 tCO ₂ e Scope 3: 56.03 tCO ₂ e
Scope 1 – Direct GHG Emissions:	Natural Gas: 42.68 tCO ₂ e Fuels (owned vehicles): 1,812.16 tCO ₂ e Fuels (mobile sources): 692.58 tCO ₂ e
Scope 2 – Energy Indirect Emissions:	Location-based: Imported Electricity: 96.48 tCO ₂ e Market-based: Imported Electricity: 68.00 tCO ₂ e
Scope 3 – Other Indirect GHG Emissions:	Category 6 – Business travel 56.03 tCO ₂ e
Exclusions	Because business travel and grey fleet are directly under our control with accurate data available, these were previously selected for the baseline carbon footprint. Ground Control is currently running a separate project with the Carbon Trust to calculate all other scope three emissions relevant to our operations and to set Science Based Targets.

3.3. Carbon reduction

PAS 2060 Requirement	Information Relating to the Carbon Neutral Declaration
Reductions achieved	The carbon footprint (market-based) reductions between the current carbon footprint (see section 3.2) and the baseline period are as follows: <ul style="list-style-type: none"> • Absolute reduction: 692 tCO₂e • Percentage absolute reduction: 20.57 %

Baseline period	01.04.2019 – 31.03.2020 (3,364 tCO ₂ e, according to the market-based method)
Economic growth rate	1.49 %
Confirmation that there has been no change to the definition of the subject	The definition of the subject remains unchanged through each stage of the methodology.
Description of the means by which reductions have been achieved and any applicable assumptions or justifications	<p>Reductions in our scope one emissions have been achieved due to the expansion of our fleet with electric vehicles and conversion of fossil fuelled tools to battery, both will continue into the next reporting period. All offices have been switched to a green tariff reducing scope two emissions from our facilities.</p> <p>During the reporting period FY2020-21, our business operations were impacted due to the coronavirus pandemic. Reduced business travel activities and energy demand for our offices has reduced emissions in these areas.</p>

3.4. Carbon offsets

PAS 2060 Requirement	Information Relating to the Carbon Neutral Declaration
Offset methodology	Offsets purchased to balance our carbon emissions. The offset projects are verified by the Gold Standard and VCS as approved to PAS 2060 requirements.
Offset Confirmation	<p>The offsets generated represent genuine, additional GHG emission reductions elsewhere. Projects involved in delivering offsets meet the criteria of additionality, permanence, leakage, and double counting. Carbon offsets are verified by an independent third-party verifier.</p> <p>The credits from the selected carbon offset projects are:</p> <ul style="list-style-type: none"> • only issued after the emission reduction has taken place. • retired within 12 months from the date of the declaration of achievement. • supported by publicly available project documentation on a registry which provides information about the offset project, quantification methodology and validation and verification procedures. • stored and retired in an independent and credible registry.
Offsets	Full details of the carbon offsets included in making this declaration are provided in Appendix 1.

4. Declaration of ongoing commitment to carbon neutrality

PAS 2060 Requirement	Information Relating to the Carbon Neutral Declaration
Declaration of on-going commitment:	<p>Ground Control commits to maintain carbon neutrality for the organisation in accordance with PAS 2060 annually until at least 2025.</p> <p>Carbon neutrality for Ground Control will be achieved by March 2023.</p>

4.1. Carbon management plan

PAS 2060 Requirement	Information Relating to the Carbon Neutral Declaration
Targets for GHG reduction for the defined subject appropriate to the timescale for achieving carbon neutrality	<ul style="list-style-type: none"> • Mobile Fuel reduction - 10% intensity reduction per year, 2.2 tCO₂e/£m from 01.04.2020 • Stationary Fuel reduction - 5% intensity reduction per year, 0.2 tCO₂e/£m from 01.04.2021 • Electricity - Reduce market-based electricity emissions to zero by 2025 from 01.04.2021 • Business Travel - Reduce by 10% per year (on an intensity metric relative to revenue) from 01.04.2020

	<ul style="list-style-type: none"> • Grey Fleet - Reduce by 5% per year (on an intensity metric relative to revenue), 0.078 tCO2e/ £m from 01.04.2020
Planned means of achieving and maintaining GHG emissions reduction	<ul style="list-style-type: none"> • Procure 100% electricity from renewable sources (for fixed energy use e.g., offices) • Expand EV Fleet to 100% passenger vehicles by 2024 • All small / hand tools non fossil fuel powered by 2023 (in line with manufacturer/market capacity and to meet operational requirements) • All other equipment (excl. vehicles and heavy plant) non fossil fuel powered by 2025 (in line with manufacturer/market capacity and to meet operational requirements) • Expand the use of Hydrogenated Vegetable Oil (HVO) fuel in all our operations and replacing red diesel where legislation dictates • Increase the uptake of EVs by employees • Calculate scope three emissions and set net zero science-based targets verified by the SBTi • Ensure new finance and data systems will improve data quality and availability to allow for ease of monitoring and both internal/ external footprint reporting • Undertake route optimisation to reduce travel of teams between site visits • Introduce vehicle telematics to fleet by 2022 • Monitor and improve driver behaviours annually from 2022 • Travel policy introduction: Ground Control will only fly where necessary and use the lowest travel class possible, preferring train travel for domestic business trips. • Achieve ISO:50001 certification by end 2022
The offset strategy to be adopted	<p>Offset credits were selected to cover a variety of different project types across different less economically developed countries. These projects offer environmental, economic, and social sustainability benefits to the local community and environment. They are also aligned to the Sustainable Development Goals that reflect Ground Controls values (SDG 12, 13 and 15).</p> <p>Credits purchased from the following projects:</p> <ul style="list-style-type: none"> • <i>Yumrutepe Regulator HydroElectric Power Plant Project, Turkey (650 credits)</i> The hydroelectric project in the Black Sea Region of Turkey will create job opportunities and provide renewable energy to supply the growing demand. • <i>Methane Gas Capture and Electricity Production at Kubratovo Wastewater Treatment Plant, Bulgaria (600 credits)</i>

	<p>The project captures methane gas from the treatment of wastewater to supply Combined Heat and Power engines that provide electricity to both the plant and grid.</p> <ul style="list-style-type: none"> • <i>Reduced Emissions from Deforestation and Degradation in Keo Seima Wildlife Sanctuary, Cambodia (350 credits)</i> This project protects one of the largest remaining primary forests in Cambodia including the threatened species and carbon stores. In addition to environmental protection, the project recognises the importance to protect the traditions and culture of Indigenous communities. • <i>Peralta I Wind Power Project, Uruguay (472 credits)</i> The wind farm of 25 turbines provides renewable energy to national grid to reduce dependence on fossil fuel energy. • <i>199.70 MWWind Project In Maharashtra By BWDPL, India (600 credits)</i> The wind farm of 97 turbines provides renewable energy to national grid to reduce dependence on fossil fuel energy.
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Appendix of qualifying explanatory statement

Appendix 1: Offsets

Project name	Country	Project type	Standard	Type of credit	Total credit	Generation period	Retirement date	Reference No. & link to registry	Offset volume (tCO ₂ e)
Yumrutepe Regulator HydroElectric Power Plant Project	Turkey	Hydro Power	VSC	VCU	650	01/01/2021 to 31/05/2021	May 11, 2022	https://registry.terra.org/myModule/rpt/myrpt.asp?r=206&h=158125	650
Methane Gas Capture and Electricity Production at Kubratovo Wastewater Treatment Plant	Bulgaria	Wastewater Treatment	Gold Standard VER	VER	600	01/06/2016 – 31/08/2018	May 11, 2022	https://registry.goldstandard.org/credits-blocks/details/268136	600
REDD In Keo Seima Wildlife Sanctuary	Cambodia	Reduced Deforestation	VSC	VCU	350	01/01/2015 to 31/12/2015	May 11, 2022	https://registry.terra.org/myModule/rpt/myrpt.asp?r=206&h=149600	350
Peralta I Wind Power Project	Uruguay	Wind Power	VSC	VCU	472	01/01/2018 to 31/12/2018	May 11, 2022	https://registry.terra.org/myModule/rpt/myrpt.asp?r=	472

								206&h=164822	
199.70 MWWind Project In Maharashtra By BWDPL	India	Wind Power	VSC	VCU	600	01/01/2021 to 30/09/2021	May 11, 2022	https://registry.terra.org/myModule/rpt/myrpt.asp?r=206&h=160918	600
								Total tonnes (tCO₂e) offset	2,672



Carbon Offset Certificate



Carbon Footprint Ltd provides this certificate to confirm carbon offsetting has been completed as shown in the table below.

Order Ref.	Customer	Project ID	Project Name	Std	tCO2	Date
8481	Ground Control Ltd	VCS1650	Reduced Emissions from Deforestation and Degradation in Keo Seima Wildlife Sanctuary	VCS	350.0	05/04/2022
8481	Ground Control Ltd	VCS1741	Yummutepe Regulator and 15,013 MW Hydroelectric Power Plant Project	VCS	650.0	05/04/2022
8481	Ground Control Ltd	GS4238	METHANE GAS CAPTURE AND ELECTRICITY PRODUCTION AT KLUBRATOVO WASTEWATER TREATMENT PLANT, SOFIA, BULGARIA	Gold Standard VER	600.0	05/04/2022
8481	Ground Control Ltd	VCS1447	199.70 MW WIND PROJECT IN MAHARASHTRA BY BWDPL	VCS	600.0	05/04/2022
8481	Ground Control Ltd	VCS1349	PERALTA I WIND POWER PROJECT	VCS	472.0	05/04/2022
			Total		2,672.0	

SURE

John Buckley, Managing Director, Carbon Footprint Ltd. www.carbonfootprint.com

Appendix 2: Independent third-party assurance



Certificate of Achievement

Ground Control Ltd

has achieved carbon neutrality related to the 01/04/2020 – 31/03/2021 application period and is committed to on-going carbon neutrality of the total carbon footprint for

All Operations – Scope 1, 2 and Scope 3 (business travel)

Carbon Trust Assurance Limited certifies that this company has correctly calculated its carbon footprint for the year 01/04/2020 – 31/03/2021 and satisfactorily offset this to achieve carbon neutrality, in accordance with:

- PAS 2060:2014 – Specification for the demonstration of carbon neutrality

A detailed list of certified results can be found in the associated Certification Letter CERT-13270

Awarded: 10th June 2022

for and on behalf of Carbon Trust Assurance Ltd,

A handwritten signature in black ink, appearing to read "Hugh Jones".

Hugh Jones,
Managing Director

Appendix 3: Additional supporting information for interested parties

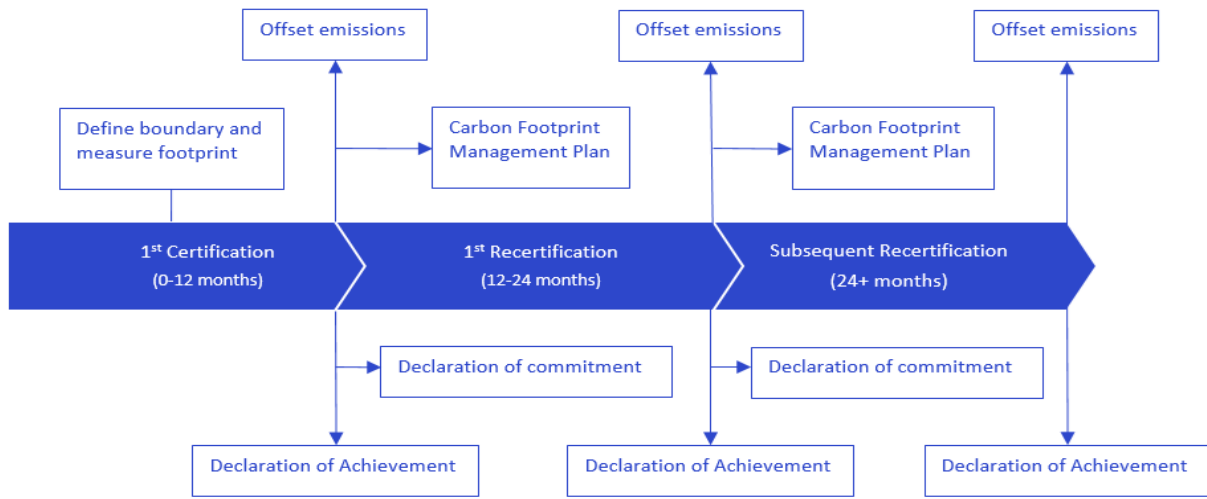


Figure 1. PAS 2060 certification process

Source: Carbon Trust. Adapted from “BSI - PAS 2060:2014: Specification for the demonstration of carbon neutrality: Figure 1 – Illustration of the cyclical process for demonstrating carbon neutrality, taking into account permitted baseline period exceptions”. [Simplified version]

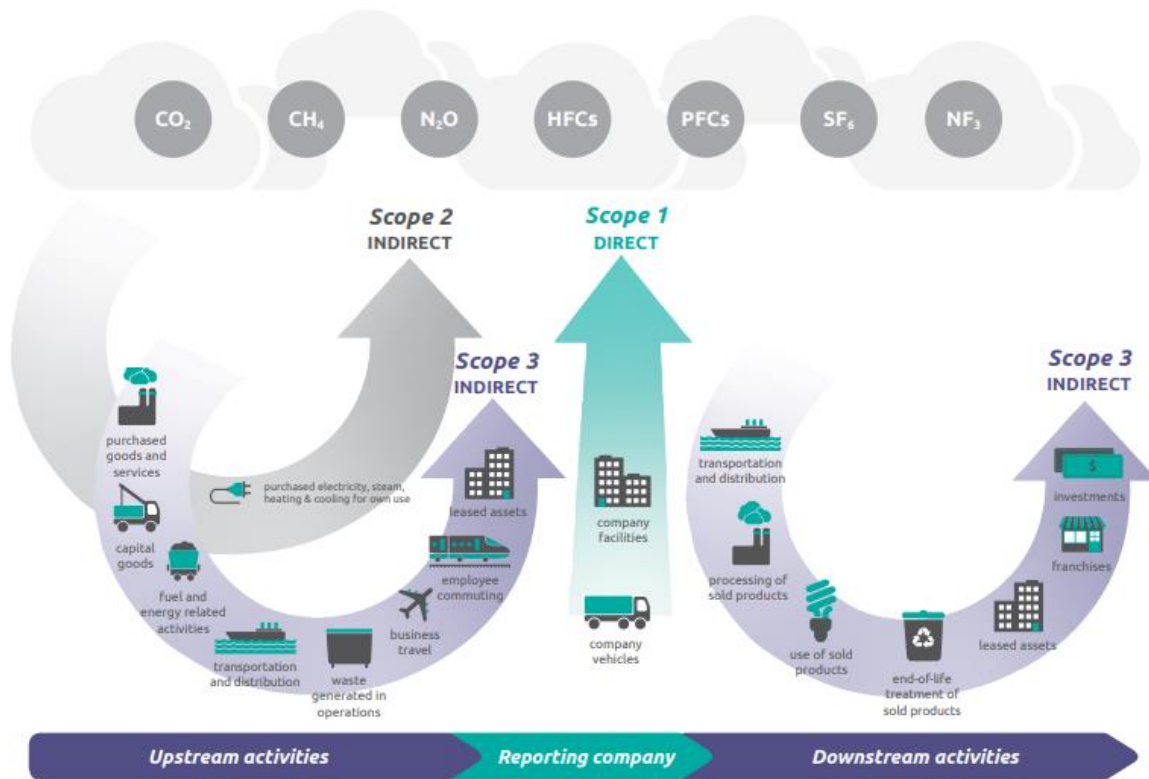


Figure 2. Organisational carbon footprinting

Source: Greenhouse Gas Protocol: <http://ghgprotocol.org/>