



### **Carbon Accounting**

Presented by Beau Bartlett, Trace and Fiona Hawkins, James Cowper Kreston

22 October 2025

**Maximise your potential** 





Fiona Hawkins





Beau Bartlett

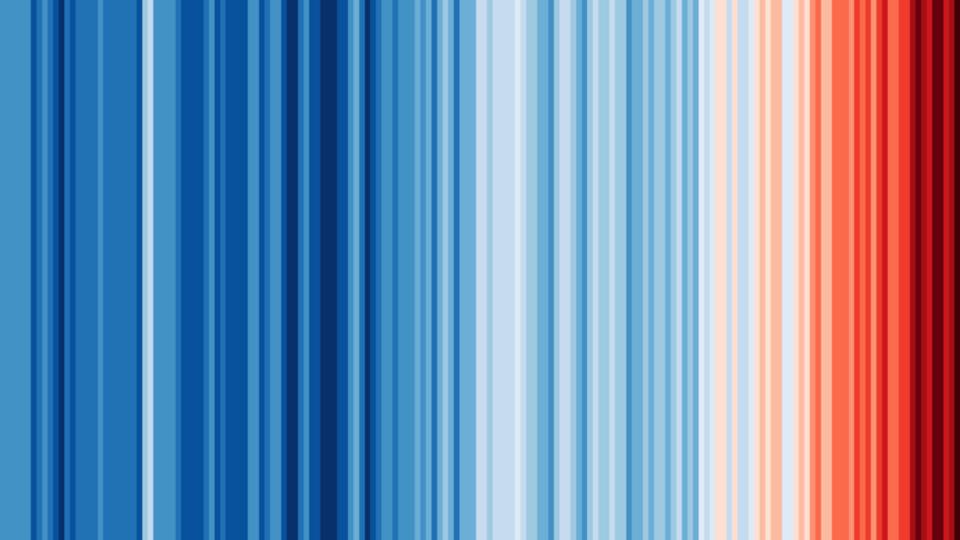


- → Carbon & Net Zero 101
- → What is driving requests for carbon data?
- → Why does my business need to prepare?



# Carbon & Net Zero 101







We must reach net zero emissions by 2050 ASAP to avoid catastrophic climate change\*



## Climate reporting momentum & setbacks

#### **United Kingdom**

SECR & UK SRS

#### **United States**

SEC's climate disclosure rules on hold but some states pushing ahead

EU

Non-Financial Reporting Directive (NFRD)

Corporate Sustainability Reporting Directive (CSRD)

Carbon Border Adjustment Mechanism

#### **Switzerland**

Federal Act on Climate Protection Goals, Innovation and Strengthening Energy Security

#### **Australia**

Mandatory Climate Reporting

#### **New Zealand**

Climate-related Disclosure Regime (CDR)



### Climate ambition in the UK

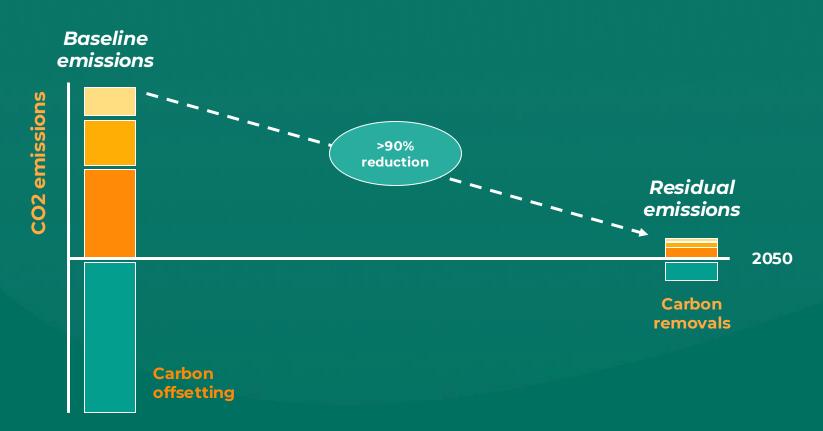
The Climate Change Act commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050.

The Climate Change Act requires the government to set legally-binding 'carbon budgets' to act as stepping stones towards the 2050 target.





## How do we get to Net Zero?



## 6 essential steps to achieve

## net zero emissions







## How are emissions categorised?

Scope 1

Direct emissions



Scope 2
Indirect emissions



Scope 3
Indirect-supply chain emissions



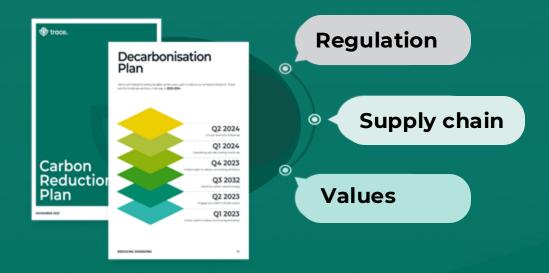


# **Demand for Carbon Data**



# 46% of companies already asked to report on carbon

£50bn market by 2030\*







Legally binding
Country level
commitment
to Net zero

Regulation

**Policy** 

**Corporate reporting** 

Supply chain reporting requirements

SME reporting at scale

# The increasing demand for carbon data

#### Regulation

SECR, TCFD, CSRD, ISSBs **UK SRS based** on ISSBs coming soon.

Likely to replicate Aus market, 1 year behind hitting companies of 100 staff in 2027

#### Corporate reporting

Corporates are required to report via regulation, this includes scope 3 emissions which is your supply chain. Generally 80% of emissions sit in scope 3

#### Policy

UK Gov PPN 06/21 currently live across NHS supplychain. Now required to provide a Carbon Reduction Plan

Rolling out more widely to all other gov departments including homeoffice, police, defense

#### SME reporting

SMEs are required to report on their scope 1,2,3 emissions. The requirement for this data comes from sitting in the supply chain of a larger corporation or gov department





## Climate reporting rollout example: Australia

## Group 1 - 1 Jan 2025

#### Two of the following

- > 500 employees
- > \$1bn consolidated assets
- > \$500m revenue

## Group 2 - 1 July 2026

#### Two of the following

- > 250 employees
- > \$500m
   consolidated assets
- > \$200m revenue

## Group 3 - 1 July 2027

#### Two of the following

- > 100 employees
- > \$25m consolidated assets
- > \$50m revenue



# Supply chain requirements



# Key drivers of supply chain pressure for carbon reporting

**Public Policy** 

**Corporate targets** 



# Public policy - PPN 06/21

Supply chain pressure in the

public sector



# Procurement Policy

# Note (PPN) 06/21

In 2019, the *Climate Change Act* was amended with the introduction of a world leading net zero target: 100% reduction in the net UK carbon account by 2050.

PPN 06/21 sets out how to account for net zero in government contracts - a Scope 3 emissions source for the central government.

Legally binding
Country level
commitment
to Net zero

Regulation

**Policy** 

Corporate reporting

Supply chain reporting requirements

**SME** reporting at scale





# Case study - The NHS

- → The NHS has a commitment to reach net zero by 2040 for the emissions it controls directly
- → And by 2045 for the emissions it influences, through the goods and services it buys from its partners and suppliers.

To achieve this goal, the NHS needs the support of all its suppliers.





## **NHS Net Zero Supplier Roadmap**

From April

2022

From April





#### Net Zero and Social Value

All NHS procurements include a minimum 10% net zero and social value weighting. The net zero and social value guidance for NHS procurement teams helps to unlock health-specific outcomes (building on PPN 06/20). Net Zero and Social Value will be applied via the Evergreen assessment for NHS England Medicines tenders.

#### Carbon Reduction Plan

For all new contracts above £5 million per annum, the NHS requires suppliers to publish a Carbon Reduction Plan for their UK Scope 1 and 2 emissions and a subset of scope 3 emissions as a minimum (aligning with PPN 06/21).

From April 2024, this requirement will be proportionately extended to cover all new procurements.

#### From April 2027

#### Carbon Reduction Plan for all emissions

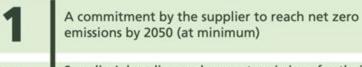
All suppliers will be required to publicly report targets, emissions and publish a Carbon Reduction Plan for global emissions aligned to the NHS net zero target, for all of their Scope 1, 2 and 3 emissions.

#### From April 2028

#### **Product-level requirements**

New requirements will be introduced overseeing the provision of carbon footprinting for individual products supplied to the NHS. The NHS will work with suppliers and regulators to determine the scope and methodology.

# What information should a CRP contain?



- Supplier's baseline and current emissions for their UK operations at a minimum (Scopes 1,2 and subset of scope 3)
- 3 Supplier's most recent emissions reporting for the previous reporting year
- All emissions information displayed as CO2e (carbon dioxide equivalent)
- What environmental management measures are being undertaken by the supplier, including certification scheme or specific carbon reduction measures adopted
- A signature from a board member (or director if no board is in place)
- A link to where the CRP is publicly available on the supplier's website



It is mandatory that every tender includes a Carbon Reduction Plan. My discussion with our procurement team ensures that every contractor submits one. They need to know their baseline and future targets. I need to track how many have complied and what progress has been made, especially as contracts come up for renewal.

Tom Toolan, Head of Sustainability NHS Essex Partnership University NHS Foundation Trust



# Corporate targets

Supply chain pressure in the private sector



# Regulation targets corporations

Regulation includes scope 3 which is a corporates supply chain.

In order to truly understand their scope 3 they need to understand the suppliers emissions

Legally binding
Country level
commitment
to Net zero

Regulation

Policy

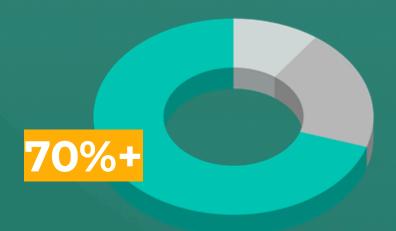
**Corporate reporting** 

Supply chain reporting requirements

**SME** reporting at scale



# Scope 3













# Case study:



# Supply Chain Standards

"Upon written request by
Amazon, suppliers are
required to set a credible
greenhouse gas target and
share progress by providing
emissions data to
demonstrate compliance with
Amazon's Supply Chain
Standards"

During an audit, Suppliers will need to grant auditors access to:

 All buildings under business license, including but not limited to management offices, employment records, production facilities, warehouses,

- dormitories, canteens, and living quarters.
   Applicable documents (including those for contracted or temporary workers)
- · Workers and site management for interviews.

Failure to allow auditors full access can result in a failed audit. If there are areas that cannot be viewed or records for some groups of workers that cannot be provided due to conditions such as non-disclosure agreements, Suppliers must inform Amazon prior to an audit.

#### Transparency requirements:

- Do not engage in illegal, deceitful, or unethical behavior (for example: bribery)
- Provide accurate documentation about working conditions
- Disclose relationships, including labor or recruitment agencies
- Give auditors access to all buildings, applicable documents, workers, and site management

#### Environment

Amazon is committed to The Climate Pledge, a commitment to reach net-zero carbon by 2040, and are requiring our suppliers to join us to reach this goal. We prioritize working with suppliers that are making real business changes to improve the environmental performance of their operations and supply chains. Moving beyond legal and compliance obligations, suppliers should be setting goals, taking action, and demonstrating sustainability progress

- Take action. Improve the environmental performance of your operations. Pursue real business changes to reduce carbon emissions and demonstrate performance against these targets. Initiatives could include improving energy efficiency, purchasing carbon free electricity, reducing transportation emissions through low carbon fuels or fleet electrification, reducing material use, or other real business changes to reduce carbon emissions. Suppliers should take action to also reduce waste and water across their operations and encourage the same throughout their supply chain.
- Share progress. Suppliers should share emissions data and performance progress publicly through industry-accepted platforms, on company websites, or directly with Amazon.
   This includes reporting on all relevant scopes in alignment with acceptable criteria under Greenhouse Gas Protocol (GHGP), or other acceptable criteria defined by Amazon to promote transparency and accountability.

Upon written request by Amazon, suppliers are required to set a credible greenhouse gas target, and share progress by providing emissions data to demonstrate compliance with Amazon's Supply Chain Standards. Amazon business partners will define requirements and contact Suppliers, if requested, on the type of data, timespan, and how to provide information to Amazon.

#### **Supplier Diversity**

Advancing Supplier diversity and inclusion (SDI) is important to Amazon because it's good for our business, aligns with our customers' expectations, and is the right thing to do for society as a whole. Amazon's Supplier diversity program is guided by our ambition to extend procurement opportunities

# There are hundreds of examples of this corporate supply chain pressure



# COST SAVINGS & GREEN FINANCE

Reducing energy, water and waste will reduce your operating costs by a minimum of 10%\*

#### **EMPLOYEES CARE**

65% of staff expect their employer to take action. **Reduce churn & attract talent** 

### **CUSTOMERS CARE**

**81% of consumers** prefer to buy from businesses that are sustainable. Sustainability drives loyalty

### WINNING BUSINESS

In order to retain and win new business sustainability credentials are needed as part of **contracts / tenders** 



## SMEs account for

>50%

# of global carbon emissions





### Why We're Offering This Service & Partnering with Trace

- Responding to Client Needs: Increasing regulatory, investor, and customer expectations for sustainability reporting
- **Expert Partnership:** Trace provides robust, user-friendly carbon accounting technology, ensuring accurate and actionable insights
- **Shared Values:** Both firms are committed to transparency, integrity, and helping clients achieve their sustainability goals



#### What This Means for Us & Our Clients

#### For Our Firm:

- We are committed to promoting sustainable and responsible business practices
- Going through the same process ourselves has highlighted how important these are to our team members

#### For Our Clients:

- Access to streamlined, reliable carbon footprint measurement and reporting
- Practical support for compliance, risk management, and sustainability strategy
- Confidence that your data is handled securely and professionally



### Why Your Accountant is Your Ideal Carbon **Accounting Provider**

- **Deep Understanding of Your Business:** We already know your operations, data flows, and reporting requirements
- **Trusted Advisors:** Accountants are skilled in data accuracy, compliance, and translating numbers into actionable insights
- Integrated Service: Carbon accounting becomes part of your regular financial and strategic review - no duplication, no extra hassle
- Sensible pricing: Not a 'one-price fits all'. We will scope all individual engagements and give you a fee quote that you can rely on



**Any Questions?** 



#### **Contact Us**



BEAU BARTLETT
Channel Partner Manager

Trace

E: beau@our-trace.com



FIONA HAWKINS

Partner

James Cowper Kreston

E: fhawkins@jamescowper.co.uk

This presentation has been carefully prepared, but it has been written in general terms and should be seen as broad guidance only. The presentation cannot be relied upon to cover specific situations and should not act or refrain from acting upon the information contained therein. Please contact James Cowper Kreston to discuss these matters in the context of your circumstances.

