Carbon Reduction Plan

Cabinet Office

CARBON REDUCTION PLAN GUIDANCE

Notes for Completion

Where an In-Scope Organisation has determined that the measure applies to the procurement, suppliers wishing to bid for that contract are required at the selection stage to submit a Carbon Reduction Plan which details their organisational carbon footprint and confirms their commitment to achieving Net Zero by 2050.

Carbon Reduction Plans are to be completed by the bidding supplier[1] and must meet the reporting requirements set out in supporting guidance and include the supplier's current carbon footprint and its commitment to reducing emissions to achieve Net Zero emissions by 2050.

The CRP should be specific to the bidding entity, or, provided certain criteria are met, may cover the bidding entity and its parent organisation. In order to ensure the CRP remains relevant, a Carbon Reduction Plan covering the bidding entity and its parent organisation is only permissible where the detailed requirements of the CRP are met in full, as set out in the Technical Standard[2] and Guidance[3], and all of the following criteria are met:

- The bidding entity is wholly owned by the parent.
- The commitment to achieving net zero by 2050 for UK operations is set out in the CRP for the parent and is supported and adopted by the bidding entity, demonstrated by the inclusion in the CRP of a statement that this will apply to the bidding entity.
- The environmental measures set out are stated to be able to be applied by the bidding entity when performing the relevant contract; and
- The CRP is published on the bidding entity's website.

Bidding entities must take steps to ensure they have their own CRP as soon as reasonably practicable and should note that the ability to rely on a parent organisation's Carbon Reduction Plan may only be a temporary measure under this selection criterion.
The Carbon Reduction Plan should be updated regularly (at least annually) and published and clearly signposted on the supplier's UK website. It should be approved by a director (or equivalent senior leadership) within the supplier's organisation to demonstrate a clear commitment to emissions reduction at the highest level. Suppliers may wish to adopt the key objectives of the Carbon Reduction Plan within their strategic plans.

---

[1] Bidding supplier or 'bidding entity' means the organisation with whom the contracting authority will enter into a contract if it is successful.

[2] Technical Standard can be found at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/991625/PPN_0621_Technical_standard_for_the_Completion_of_Carbon_Reduction_Plans__2_.pdf

[3] Guidance can be found at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/991623/Guidance_on_adopting_and_applying_PPN_06_21___Selection_Criteria___3_.pdf

Carbon Reduction Plan

HTG-UK, Danwood House, Harrison Place, Whisby Road, LINCOLN, LN6 3AH

Supplier name: HTG-UK

Publication date: September 2022 v1.0. Revised June 2024 v1.4F

Commitment to achieving Net Zero

HTG-UK are committed to achieving Net Zero emissions by 2040.

Baseline Emissions Footprint

Baseline emissions are a record of the greenhouse gases that have been produced in the past and were produced prior to the introduction of any strategies to reduce emissions. Baseline emissions are the reference point against which emissions reduction can be measured.

Baseline Year: 1st January to 31st December 2018
Additional Details relating to the Baseline Emissions calculations.
HTG-UK's baseline is built upon our ESOS Phase 2 reporting data which was formally notified to the Environment Agency. This is calendar year 2018 and captures the ESOS qualification date of 31st December 2018. Our ESOS Phase 3 was completed by our independent consultants who have conducted site audits, fleet profiling and inspections, producing a range of energy savings opportunities set out as recommendations. These have been accepted and signed off by our board of directors. The Notification of this to the Environment Agency was completed and our ESOS Phase 3 Action Plan was submitted to Government in early 2025. This to be published on the Governments website. The ESOS phase 3-year period mirrors the calendar year reference period for ESOS Phase 2. HTG-UK have not previously been captured by SECR, but we are working on gathering data for the relevant periods. We have updated our Scope 3 data retrospectively following discussions with our Tier 1 suppliers and providers. There are caveats to some of these data as several of these providers are either not able to provide the data we have requested at this time or have simply provided their 'sustainability statements' that set out their belief that they have offset their responsibilities. We are continuing to chase down the actual data that relate to HTG as we do not consider this to be an acceptable approach.
Baseline year emissions: 2018

Carbon Reduction Plan

EMISSIONS	TOTAL (tCO_2e)
Scope 1	**3,181**
Scope 2	**138**
Scope 3 **(Included Sources)**	**1. Oxygen cylinder delivery, Fleet hire, Uniform deliveries** **2. Waste collection, Water supply.** **3. Business travel, public transport, grey fleet, Volunteer drivers** **4. Commuting** **5. Water treatment, Waste treatment/disposal, Oxygen cylinder removals** **1,655**
Total Emissions	**4,974**

Carbon Reduction Plan

Most Recent Emissions Reporting

Reporting Year: 1st January 2024 to 31st December 2024	
EMISSIONS	**TOTAL (tCO_2e)**
Scope 1	**Data from January to December 2022. Narrative:** Following our baseline, we have moved all of our company cars to battery electric vehicles since 2020. We have also installed EV charge points at several our sites. This to allow for on-site charging of these and future vehicles. We have successfully trialled fully electric ambulances n contracts. The majority of our fleet for the BNSSG contract will be brand-new (Euro VI or VII) vehicles, selected for their environmental performance and operational suitability. All ICE vehicles will include Start/stop technology, Low NO_x emissions (with AdBlue technology), low CO_2 values, high fuel efficiency, gear shift indicators and ultra-low roll resistance tyres. All HTG-UK vehicles will be minimum EURO 6 classification (or full EVs). Vehicle weight is a core consideration: Specifically, completed ambulance conversions are required to maintain a gross vehicle weight below 3.5 tonnes, meaning smaller engine variants to further reduce emissions. Speed, routing, idling and driver actions are continually monitored / trained. We expect 75% of our vehicles to be ULEV or ZEV from 1st April 2026. In moving towards BEVs, we are not only looking at exhaust emissions but also a significant (83%) reduction in particulate matter from brake discs. **2,323 transport, 59 Heating fuel.**
Scope 2	**Data from July to December 2022 awaited. Narrative:** We have begun to transition our premises lighting to LED across our sites and now operate better control over our air-to-air heat pumps such that we have locked comfort zones and are instigating an energy policy for staff. **78 electricity**
Scope 3 **(Included Sources)**	1. **Oxygen cylinder delivery, Fleet hire, Uniform deliveries** 2. **Waste collection, Water supply.** 3. **Business travel, public transport, grey fleet, Volunteer drivers** 4. **Commuting**

	5. **Water treatment, Waste treatment/disposal, Oxygen cylinder removals** We are in actively moving some of our grey fleet to company cars and, where possible making these BEVs. This whilst encouraging public transport use and salary sacrifice. This will not only reduce our emissions but will also allow us to take better control over this aspect of our fleet. **1,074**
Total Emissions	**3,647**

Emissions reduction targets

The above represents the organisation's baseline and follow up year 2024. Due to internal changes in the organisation, not least the transition from TASL to HTG-UK and the massive effects that Covid-19 had on our organisation as a healthcare provider from March 2020, we have not documented our emissions during 2019. The reasons behind this are as follows:

The effect of the pandemic on our business means that the intervening years will not demonstrate anything especially useful.

We are focusing on our future which is the areas in which we have the potential to make savings.

We have a 2018 baseline year that is pre pandemic and serves as a solid base from which to build.

We are driving our scope 3 emissions alongside our Tier 1 providers, and we feel that this is much more important than calculating data between 2018 and 2024.

In order to continue our progress to achieving Net Zero, we have adopted the following carbon reduction targets.

Targets

We have expectations to follow the NHS targets, specifically:

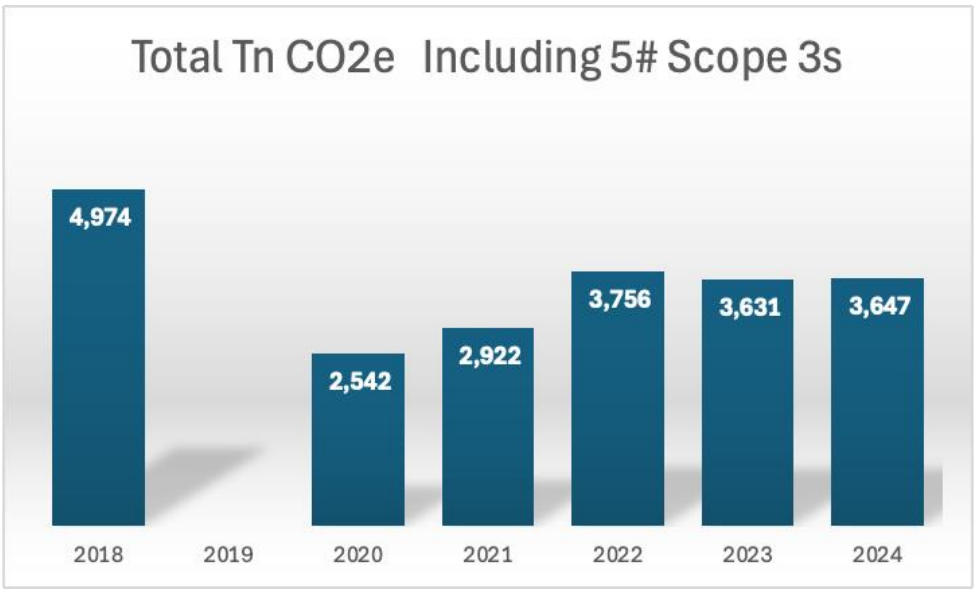
- For the emissions we control directly (the NHS Carbon Footprint), we will reach net zero by 2040, with an ambition to reach an 80% reduction by 2028 to 2032.
- For the emissions we can influence (our NHS Carbon Footprint Plus), we will reach net zero by 2045, with an ambition to reach an 80% reduction by 2036 to 2039.

Carbon Reduction Plan

Our absolute emissions CO2e footprint in terms of scope is tabled below:

Jan-Dec	Total Tn CO2e inc Water & Waste	Total Tn CO2e Including 5# Scope 3s
2018	3,730	4,974
2019	-	
2020	1,397	2,542
2021	1,812	2,922
2022	2,710	3,756
2023	2,456	3,631
2024	2,574	3,647

The graph below sets out the trajectory from the table above.



Carbon Reduction Plan

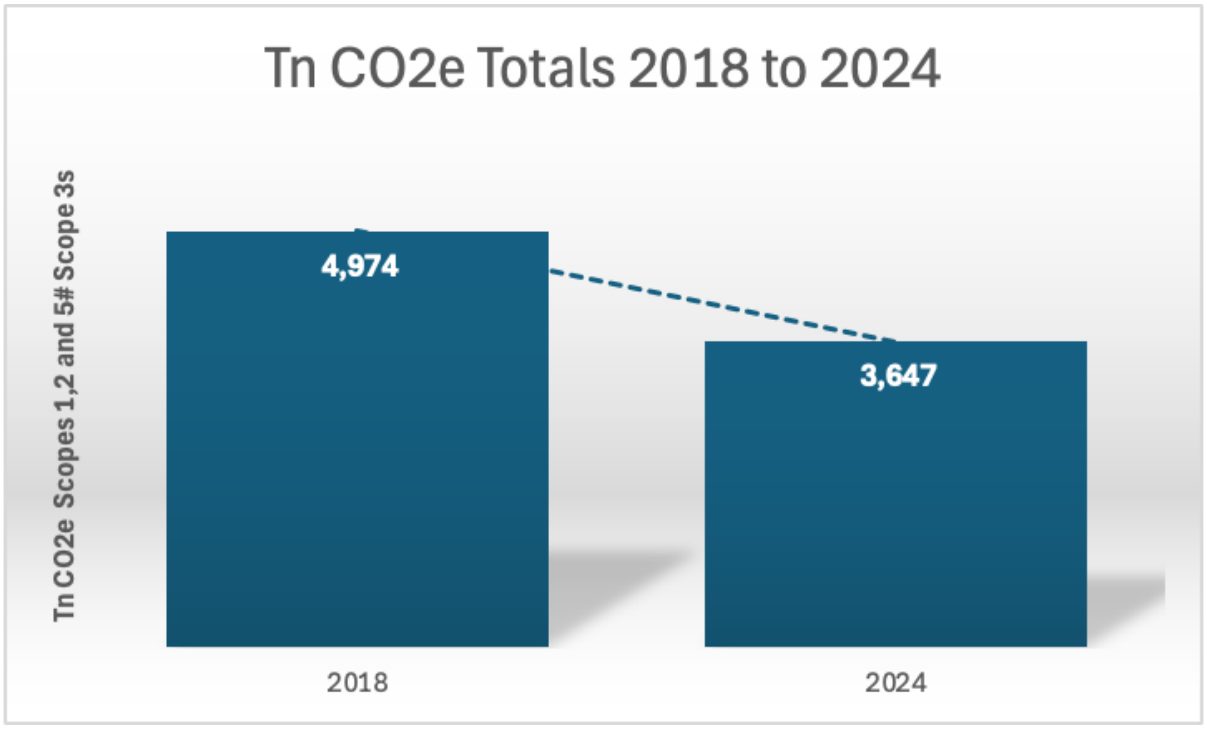
We recognise that as an organisation, that transport is our largest emitter. This is apparent in the table below:

Jan-Dec	Scope 1 Building	Scope 1 Transport	Scope 2 Electricity	Scope 3 Grey Fleet	Total Tn CO2e	Total Tn CO2e inc Water & Waste	Total Tn CO2e Including 5# Scope 3s
2018	9	3,174	138	469	3,790	3,730	4,974
2019					-		-
2020	32	1,249	74	31	1,386	1,397	2,542
2021	28	1,642	66	65	1,801	1,812	2,922
2022	45	2,606	48	-	2,699	2,710	3,756
2023	17	2,369	59	-	2,445	2,456	3,631
2024	59	2,323	78	101	2,562	2,574	3,647

Direction of Travel

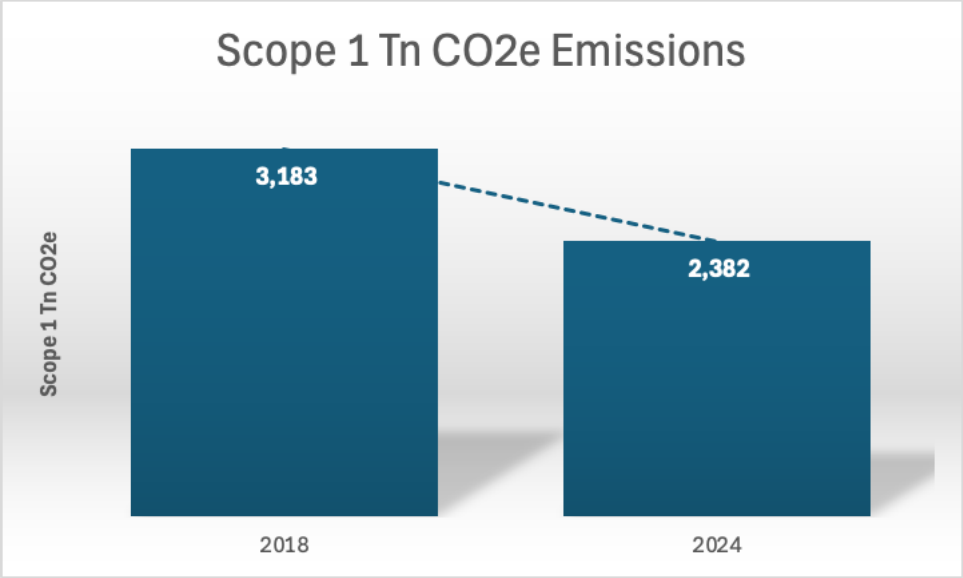
Since 2018 our emissions have reduced significantly. This can be seen in the graphs that follow for each scope and for all scopes currently recorded:

Scope 1, 2 and 5# Scope 3 emissions:

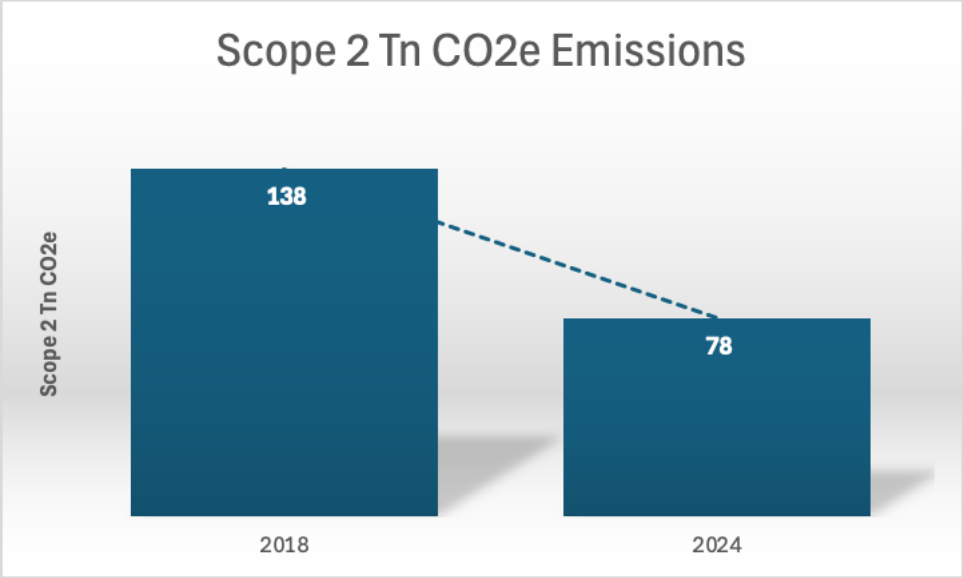


Individually for each scope, there are clear reductions:

Scope 1 emissions:

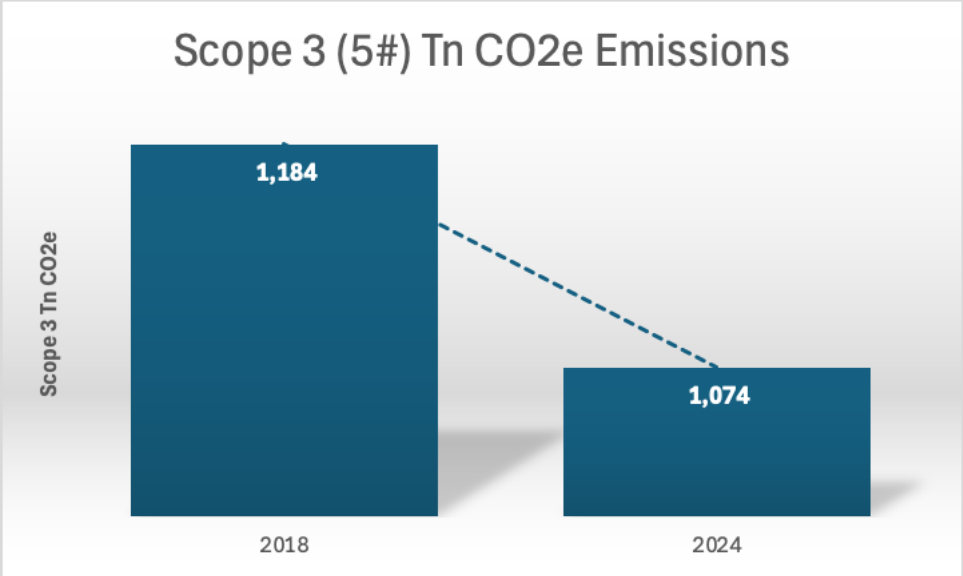


Scope 2 emissions:



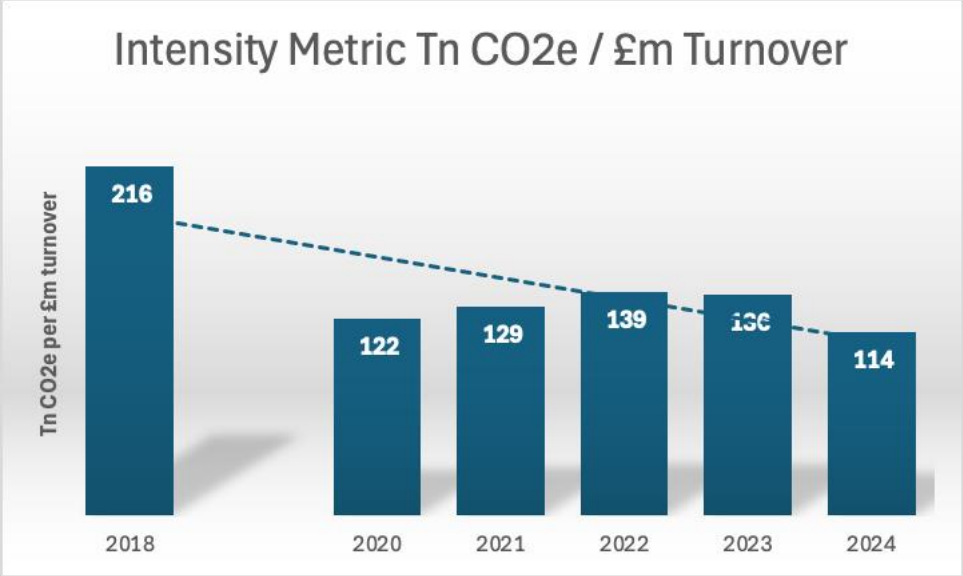
Scope 3 emissions:

Carbon Reduction Plan



Intensity Metrics

The key intensity metric here is Tn CO2e by annual turnover in £ millions. Whilst turnover has been broadly rising between 2018 and 2024, the trend here is downward.



Carbon Reduction Plan

Carbon Reduction Projects

Completed and progressing Carbon Reduction Initiatives

The following environmental management measures and projects have been completed or implemented since our 2018 baseline.

As a company, HT Group (HTG) have been actively addressing our tangible effects on the environment since our 2018 baseline. We see the climate emergency as a healthcare emergency, adversely affecting cardiovascular, asthma, cancers, and vector borne diseases alongside mental wellbeing.

Recognising that at 10.269 GWh (during our last full EED ESOS site and fleet audit in 2022), our fleet transport operation is our significant energy consumer (SEC) and accounts for 94.7% of our total (scope 1 and 2) energy consumption (in kWh terms) and at 2,471 tonnes, 95.8% of our total scope 1 and 2 CO_{2e} emissions. our principal focus is to devote our energies to reducing our transport emissions through specific SMART actions directed at our fleet vehicles, using technologies, measures, controls, and driver behaviours.
Our ambulance fleet accounts for 85.6% of all energy consumed by HTG-UK.

Ability to operate the buildings sustainably using heat pumps, potential for the installation of solar PV arrays, as well as options to install electric vehicle charging points (EVCPs) will be prioritised. We have instigated conversations with Western Power Distribution for the South-west Region to discuss potential to export excess solar generated energy, install heat pumps, and EVCPs. Our discussions are ongoing.
Whilst contributing less than 5% of our scope 1 and 2 emissions, buildings that support our journey to net zero are important to us in supporting the sustainable electrification of our fleet. Delivering sustainable built operations, helps our staff and partners to appreciate all aspects of the net zero journey we have embarked upon. We will seek satellites such as rugby clubs to optimise their operational use in local communities.

As of October 2022, now have accurate telematics across our fleet. This allows us to monitor and target poor driver behaviour and help establish where to focus our early changeovers to BEV ambulances and wheelchair accessible vehicles.

Having rolled out LED lighting across our sites, we continue to deliver energy savings across our estate. There were only three of our sites at (Louth, Leicester and Wath – these have since closed), that heat with gas. The remaining sites are electrically heated, two with efficient air-to-air heat pumps.

Work in Progress

We recognise that our electrical infrastructure needs work to improve capacity and allow additional battery electric vehicle charging points (EVCPs) to be introduced at our centres. Not only will this help make us energy independent in the event of fuel shortages and strikes etc

but will also allow our drivers the peace of mind of knowing that they don't necessarily have to rely on public charging infrastructure.

We are looking at several of our sites with a view to electrifying heat and removing gas heating. Naturally, some of these sites rely on landlord agreements.
Where possible we are leasing newly acquired sites in concert with the land operators and this includes rugby clubs where our operational needs are well synchronised.

We are considering PAS 2060 although at this stage our focus is on implementing tangible and actual measures and not relying on sequestration and offsetting. Our aims, as far as reasonably practicable, are to be net zero as opposed to carbon neutral. We are placing emphasis on ESOS as opposed to ISO 50001 as we understand that at this stage, the former will provide us with more calculated and actual actionable opportunities to implement.

This report has been conducted using the guidance of the Greenhouse Gas Protocol. The company is accredited to ISO 14001 (2015) No: 324322021 and ISO 9001 (2015) No: 324262021.

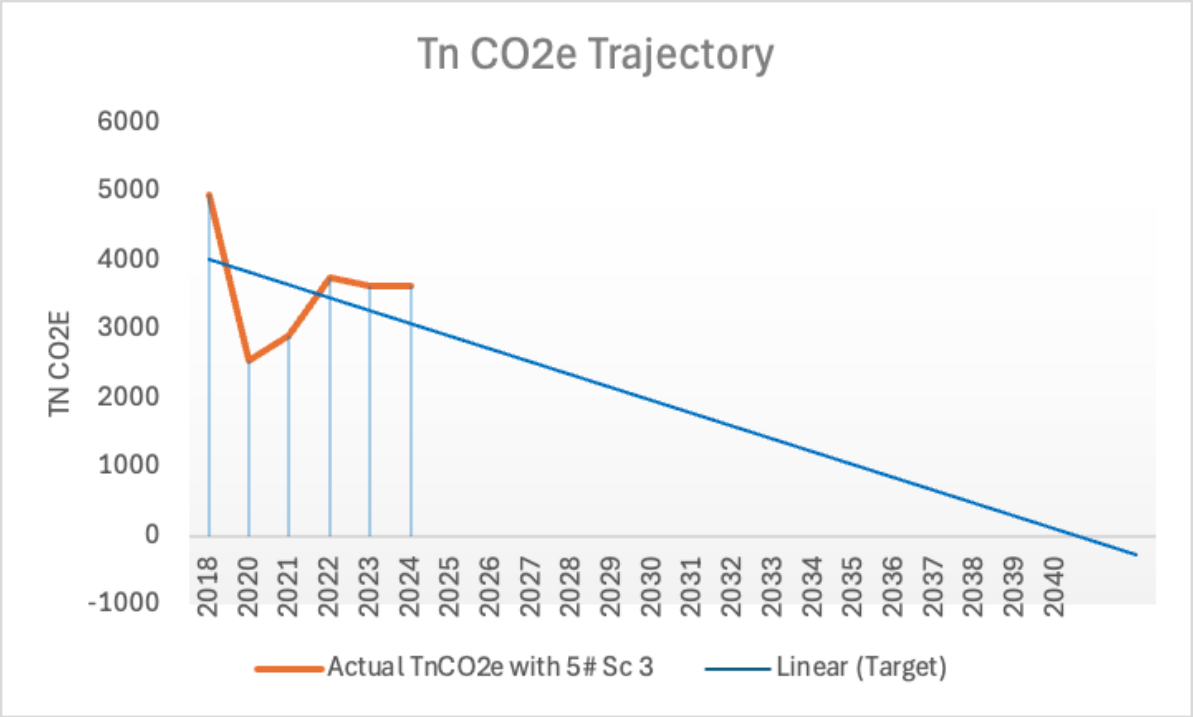
We project that carbon emissions will decrease significantly over the next five years and with the measures in place. Assuming same size operational fleet as of 2018, we expect to see a 10%-15% reduction in emissions by 2026. We will have a much clearer appreciation of this post our ESOS phase 4 reporting in early 2026. It is important to us that all our targets and emissions reductions calculations are SMART and can be verified independently.

The calculations produced for our annual carbon reduction plan (CRP) updates are unequivocal. Over the duration of the contract, we would expect to increase the number of scope 3 emissions we include in our dataset. This will inevitably increase our overall emissions as more indirect emissions are captured and more accuracy in reporting granularity is secured, in partnership within our supply chain.

It is important that these data are transparent to you as capturing accurate data, and acting upon the reduction of scope 3 emissions is critical to the NHS Evergreen Artemis plan; a project which we are committed and signed up to.

We continue to conform with and to be externally accredited to ISO 14001. We have begun the introduction of specialist environmental training to our staff.

Direction of trajectory against these targets can be seen in the graph below. What can be seen is that HTG look to be on an encouraging trajectory:



Estimates and exceptions

Our electricity and gas data are built around our ESOS Phase 2 and Phase 3 data which was independently compiled and notified to the Environment Agency in accordance with the directive (2012/EU/27) and which contains some estimates due to non-half hourly billing at most sites and reliance on readings and estimates.

Our water use is based on an extrapolation of water billing for a similar period for three sites, calculation for water use per staff member at these sites is then calculated for staff numbers at each site during the baseline year.

Our waste and recycling data is based on Eurobin lifts and litre data in 2020/21 which did not change since 2018 for five sites and extrapolated for remaining sites based on staff numbers during our baseline year. A figure for litres to kg of material has been provided using the UK Government's waste classification scheme for commercial paper and card. Our material is not source segregated but goes for closed loop recycling.

We have begun to factor the first five areas of our relevant Scope 3 emissions: Specifically:

1. Upstream transport and distribution.
2. Waste generated in operations.
3. Business travel.

4. Employee commuting.
5. Downstream transport and distribution.

These focus on our tier 1 suppliers. However, this remains very much work in progress. We are cognisant of the fact that we have not yet achieved this full dataset. We have managed to capture data for 2018 and 2024. Several of our suppliers such as ambulance and IT providers, have offered us their statements of net zero which, whilst encouraging are not setting out our specific aspects of their scope 3 delivery or onward disposal. We also believe that there are areas and operations that should be on this list, but our suppliers have so far been unable to provide us with their scope 1 and 2 data as it relates to our scope 3 emissions. We continue to challenge these suppliers for these data.

In the future we hope to implement further measures such as:

A move of our wheelchair accessible vehicles and ambulances to battery electric vehicles and later to fully electric ambulances. The increased electrical capacity at our sites and roll out of more electric vehicle charging infrastructure.
The installation of renewable energy including solar PV arrays.
Continued operations on energy efficiency measures, controls, and behaviours within our buildings and across our fleet through the more consistent use of our new and more intelligent telematics system that are now in operation.

Having delivered several of the recommendations for our ESOS Phase 2 report, we are working through the findings of our ESOS Phase 3 report, provided in Autumn 2023. This is allowing us to begin further tangible activity on our estate and fleet and links towards our published ESOS Phase 3 Action Plan.

Declaration and Sign Off

This Carbon Reduction Plan has been completed in accordance with PPN 06/21 and associated guidance and reporting standard for Carbon Reduction Plans.

Emissions have been reported and recorded in accordance with the published reporting standard for Carbon Reduction Plans and the GHG Reporting Protocol corporate standard[4] and use the appropriate Government emission conversion factors for greenhouse gas company reporting[5].

Scope 1 and Scope 2 emissions have been reported in accordance with SECR requirements, and our subset of Scope 3 emissions have been reported in accordance with the published reporting standard for Carbon Reduction Plans and the Corporate Value Chain (Scope 3) Standard[6].

[4] https://ghgprotocol.org/corporate-standard
[5] https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting
[6] https://ghgprotocol.org/standards/scope-3-standard

Carbon Reduction Plan

This Carbon Reduction Plan has been independently produced from HTG-UK data by our consultants CLS Energy (Consultancy) Ltd and reviewed and signed off by Derek Laird on behalf of the board of directors.

For aspects of scope 3 emissions, we have challenged our Tier 1 providers to deliver this. However, many of them simply don't collect such data and where they do, they do not hold it in a sufficiently granular format to allow the specific data related to our operations to be forthcoming. In the cases where we have been unable to receive these data, we have made estimates or withheld data in these sections until such time as data becomes available.

It is our intention to continue to chase and challenge these data from our Tier 1 providers until such time as we receive data that we can be satisfied with. Where possible, we are also endeavouring to advise and work alongside these partners to assist the to gather their scopes 1 and 2 data (as aspects or percentages of these are the data that form our scope 3s):

1. Upstream transport and distribution - outbound logistics. The transportation and distribution of products purchased and use of these services by HTG in the reporting year between our tier 1 suppliers and our own operations (in vehicles and facilities not owned or controlled by HTG as the reporting company).
Upstream emissions are indirect GHG emissions related to purchased or acquired goods and services.

2. Operational use waste and recycling. Based on Eurobins per site, size of these in litres, number of lifts per week and type of waste.

3. Business travel – To include all business-related travel activities including flights, trains, buses, ferries, taxis where data available, as well as company car travel, BEV claims or miles, grey fleet (mileage reimbursement) and (where available) cycling and walking for 2018 and 2024.

4. Employee commuting. Where data and GDPR permit.

5. Downstream transport and distribution - Downstream logistics (after point of sale). The transportation and distribution of products sold by us in the reporting years between our operations and the end consumer (if not paid for by HTG). This includes retail and storage (in vehicles and facilities not owned or controlled by HTG). **Downstream emissions** are indirect GHG emissions related to sold goods and services.

Situation Statement

It is our considered view that HTG currently meet Level 2 of the Evergreen Sustainable Supplier Assessment. HTG do have a Spanish parent and we do have data on their sustainability credentials. However, at this stage the operations have not been rationalised.

Signed on behalf of the Supplier:

Signed

Name Mr Derek Laird

Position Managing Director

Company HTG UK

https://www.htg-uk.com

Date: 16th June 2025

Signed on behalf of independent report producer:

Signed

Name Alan Asbury

Position Director

Company CLS Energy (Consultancy) Ltd

https://clsenergy.com

Date: 16th June 2025

End.