

Carbon Reduction Plan

July 2025

Commitment to achieving Net Zero

Freedom Leisure is committed to achieving Net Zero emissions by 2030.

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: 2019 /20	
<p>Our baseline emissions inventory includes all our measurable Scope 1, 2 and 3 emissions. Electricity and Gas kWh usage is compiled using half-hourly data wherever available from smart meters through Stark, with in house meter reads and invoice data from third parties used as necessary. Business travel is calculated from business miles claimed for an average petrol vehicle and fuel card data for company maintenance vehicles. Where Freedom Leisure is not directly responsible for the procurement of utilities, the associated emissions for these supplies now sit under Scope 3, rather than being grouped into Scopes 1 and 2 as is the case for our baseline year.</p> <p>Our Baseline Year Scope 3 emissions include electricity transmission and distribution and business travel. We include all 7 Kyoto Protocol Greenhouse Gas groups in our emissions footprint calculations. Reporting of Emissions resulting from the use of grid electricity and natural gas was calculated using the UK Government GHG Conversion Factors for Company Reporting.</p>	
Baseline year emissions:	
EMISSIONS	TOTAL (tCO ₂ e)
Scope 1	16,865
Scope 2	7,184
Scope 3 (Included Sources)	878 Reported Scope 3 emissions relate to business travel and losses from the delivery of electricity through the grid. Freedom Leisure does not transport and distribute products.
Total Emissions	24,927

Current Emissions Reporting

Reporting Year: 2024/25	
EMISSIONS	TOTAL (tCO ₂ e)
Scope 1	13,631
Scope 2	5,419
Scope 3 (Included Sources)	8412 Reported Scope 3 emissions relate to business travel and commuting undertaken by colleagues, operational waste, indirectly purchased electricity and gas, and losses from the delivery of electricity through the grid. Freedom Leisure does not transport and distribute products.
Total Emissions	27,468

Emissions reduction targets

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

We intend to achieve a 50% decrease in emissions by 2025/26.

We project that carbon emissions will decrease by a minimum of 10% year on year (against our baseline).

We have achieved a 21% reduction in total energy emissions against our original baseline in the last Fiscal Year.

Performance Highlights

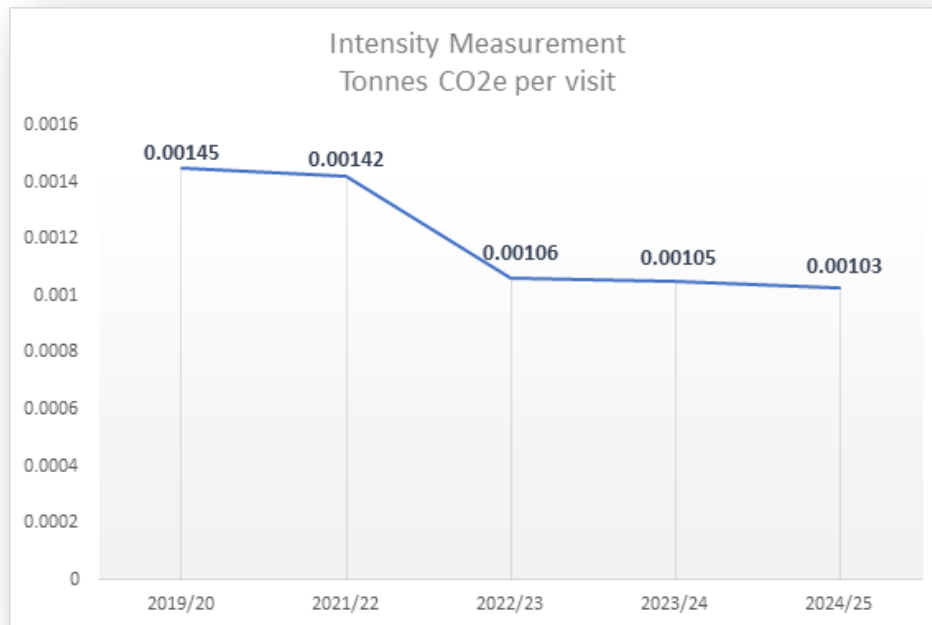
While our overall carbon footprint has increased by 1,075 tonnes compared to the previous financial year—reflecting the growth of our portfolio to 117 sites—we are proud to report substantial reductions when measured against our 2019/20 baseline:

- 15% reduction in electricity consumption
- 18% reduction in gas consumption
- Nearly 20 million kWh of energy saved across 91 sites
- Over 5,000 tonnes of carbon emissions reduced compared to baseline

These reductions demonstrate the positive impact of our low-energy strategy, capital interventions, and sustained operational focus.

Intensity ratio

We monitor and report overall emission data against an appropriate metric and this is shown against total customer visits. (as per SECR 2022/23)				
	2024/25	2023/24	2022/23	2019/20
Customer visits	23.43m	22.5m	21.0m	17.2m
Tonnes CO ₂ e per visit	0.00103	0.00105	0.00106	0.00145



Carbon Reduction Initiatives

Energy Efficiency and Carbon Reduction Performance Highlights

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Capital Interventions in 2024/25

To meet remaining energy demands responsibly, we continue to implement low and zero-carbon technologies alongside best practices in energy conservation. Key interventions this year include:

- **Solar Photovoltaic (PV) Arrays:** Installation at 16 additional centres, generating approximately 2,500 MWh. We now have 60 centres generating on-site renewable electricity, with funding secured for 7 more in 2025/26.
- **Heat Pump Technology:** Ground source and air source heat pumps installed at 3 centres, with a total of 12 centres now utilising this low-carbon heating solution.
- **Swimming Pool Sustainability**
 - Boiler replacements at 3 centres
 - Triple glazing installed in 3 pool halls
 - Air-powered showers to reduce water use across multiple sites
 - Installation of destratification fans, new pool covers, and backwash water recovery systems
 - **LED Lighting & Variable Speed Pumps:** Continued rollout across centres
 - **Lifecycle Asset Replacement:** Ongoing programme replacing boilers and assets with the most efficient available technologies

Environmental Awareness and Training

Empowering our people is central to our environmental strategy. All new colleagues complete mandatory environmental awareness training, and we have introduced a bespoke Carbon Literacy programme, developed by Community Leisure UK, accredited by the Carbon Literacy Project.

Achievements include:

- 113 colleagues certified as Carbon Literate
- Certification of Freedom Leisure as a Carbon Literate Organisation in 2024
- Launch of a Water Literacy programme

Waste Management and Zero Waste to Landfill

Freedom Leisure adheres to the waste hierarchy, focusing on waste prevention, reduction, and responsible disposal. Key achievements this year:

- A 7.6% increase overall, with Welsh sites achieving a 9.9% rise following the successful implementation of the new waste separation regulations.
- Implementation of the Simpler Recycling legislation in England expected to mirror this progress in 2025.
- All centres under our waste management control are Zero Waste to Landfill.

In the future, we aim to implement further measures such as:

Looking ahead, we are advancing a wide range of impactful initiatives, including:

- Expansion to 67 centres with Solar PV by year-end 2025/26
- Partnership to decarbonise heating systems in a further two councils
- Completion of ESOS Phase 3 audits and submission of action plan and progress report
- Compliance with new workplace recycling rules in England as we introduce additional reuse and recycling solutions
- Launch of the Environmental & Sustainability Ambassadors network
- Introduction of an Environmental Project Approval process to prioritise impactful projects
- Enhanced focus on eliminating single-use plastics

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 standard¹ and uses the appropriate Government emission conversion factors for greenhouse gas company reporting².

Scope 1 and Scope 2 emissions have been reported in accordance with SECR requirements, and the required 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) Standard³.

This Carbon Reduction Plan has been reviewed and signed off by the senior leadership team.



Ivan Horsfall Turner – CEO Freedom Leisure

¹<https://ghgprotocol.org/corporate-standard>

²<https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting>

³<https://ghgprotocol.org/standards/scope-3-standard>