



2023 Sustainability Business Plan

2023



Plan Level	Sustainability Area	Commitment/Driver/Target	2023 Actions
Environmental Compliance	Environmental Compliance	Compliance with Waste Legislation	Comply with Waste Duty of Care requirements
		Compliance with Waste Legislation	Compliance with waste storage and reporting requirements (oils, PCBs and scrap related wastes).
		Compliance with F Gas Regulations.	Comply with F Gas Regulations.
		Compliance with Ecology, Hydrology and Archaeology legislation	Develop and publish a procedure for management of network activity environmental risks.
		Compliance with Ecology, Hydrology and Archaeology legislation	Implement (develop or purchase) mobile ecology tool application for use by SPEN.
		Compliance with hydrology legislation	Ensure SPEN are compliant with legal requirements for construction site run off management and Flood Defence works (FRAPs).
		We will implement Pollution Prevention Plans at 100% of our RIIO-ED2 132kV projects. Throughout RIIO-ED2	Deliver Pollution Prevention Plans for all RIIO-ED2 132kV projects.
		Compliance with Persistent Organic Pollutants legislation	Ensure SPEN are compliant with PCB management requirements by fully implementing PCB management procedure, including managing all PCB data and continuing work to classify all equipment as contaminated/ uncontaminated.
		Compliance with Persistent Organic Pollutants legislation	Deliver 2023 PCB replacement programme and escalate any slippage
		Introduce Pollution Incident Response Plans	Create and implement simple incident response plans for substations (400/275/132/33 kV).
		We will implement a programme to identify, risk assess and address high risk legacy land contamination.	Review sites with oil leaks and sites that have been upgraded due to historic leaks (initially top 10 leakage sites or those with known high risk issues) and investigate and record the land contamination status.
		Comply with ENA Regulatory FFC Requirements.	Issue incident procedure and associated comms with updated guidance on management of leaks from FFC to ensure compliance with the ENA/Regulator agreement.
		Comply with requirements for registration of septic tanks.	Comply with registration requirements for septic tanks in substations.
		Management of SPEN assets to prevent pollution.	Identify environmental civil assets at all transmission, grid and primary substations and enter data into SAP
		Improving degree of coverage of EMS	Produce Customer Service Aspects and Impacts Register to better define environmental impacts arising from their activities
		To move to the annual rotation of the Chairs of the ED2 and environmental compliance Working Groups	To move to the annual rotation of the Chairs of the ED2 and environmental compliance Working Groups
		Oil Top Up Data Recording Improvement.	We will implement a programme to identify, risk assess and address high risk legacy land contamination.
Substation Environmental Risk Assessment - Desk Top.	Substation Environmental Risk Assessment - Desk Top.	Complete desk top environmental sensitivity assessment for all grid and primary substations.	

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	Competence management	We will continue to ensure that our staff, contractors and suppliers have the skills and knowledge to allow us and our supply chain to move beyond compliance and achieve our Sustainability Goals, by identifying and ensuring delivery of appropriate environmental training.	Embed process for planning and delivery of environmental sustainability staff training in the SPEN training process
		We will continue to ensure that our staff, contractors and suppliers have the skills and knowledge to allow us and our supply chain to move beyond compliance and achieve our Sustainability Goals, by identifying and ensuring delivery of appropriate environmental training.	Deliver improvements to the SPEN training process, in particular its environmental sustainability aspects, to increase the efficiency and volume of training delivery
	Biodiversity	We will work collaboratively with our stakeholders, including the other Transmission Operators, throughout RIIO-T2 to develop and pilot a common approach and robust methodologies for delivering Biodiversity Net Gain alongside Natural Capital assessment and enhancement.	Procurement of Natural Capital tool
		We will work collaboratively with our stakeholders, including the other Transmission Operators, throughout RIIO-T2 to develop and pilot a common approach and robust methodologies for delivering Biodiversity Net Gain alongside Natural Capital assessment and enhancement.	Contribute to work with the Scottish Linear infrastructure environmental group to develop an approach to biodiversity assessment in Scotland in line with external timelines.
		We will pilot these biodiversity and natural capital assessment methodologies and associated tools on selected RIIO-T2 projects	Ongoing implementation of biodiversity tool on T2 projects as soon as ecological surveys have been carried out
		We will pilot these biodiversity and natural capital assessment methodologies and associated tools on selected RIIO-T2 projects	Pilot natural capital tool on a minimum of two T2 projects
		We will pilot these biodiversity and natural capital assessment methodologies and associated tools on selected RIIO-T2 projects	Establish biodiversity and natural capital baseline map of Transmission network area
		We will embed these biodiversity and natural capital assessment methodologies and associated tools in our business decision making processes for projects and the management of existing sites.	Review and contribute to SPEN Biodiversity and Natural Capital Action Plan development, promotion and training.
		We will work with our local communities, landowners and other stakeholders to deliver 'no net loss' in biodiversity and identify options for delivering 'net gain'.	Develop a minimum of two biodiversity/ natural capital partnership projects
		We will identify, and subsequently monitor and annually report, metrics to baseline and track the levels of biodiversity and value of natural capital on our sites and the achievement of our targets.	Develop and introduce a process for monitoring biodiversity and natural capital annual data
		We will embed these biodiversity and natural capital assessment methodologies and associated tools in our business decision making processes for projects and the management of existing sites.	Embed process to manage named T2 projects to best utilise UIOLI biodiversity funding to deliver at least 'no net loss', seeking to deliver 'net gain' where possible

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		We will work with our local communities, landowners and other stakeholders to deliver 'no net loss' in biodiversity and identify options for delivering 'net gain'. AND We will work with our local communities, landowners and other stakeholders	Contribute to development of a stakeholder engagement process that works across SPEN
	Carbon Management	We will implement processes for carbon management in relevant business activities, aligned with PAS 2080 Carbon Management in Infrastructure.	Process Road Map developed into action plan
		We will implement processes for carbon management in relevant business activities, aligned with PAS 2080 Carbon Management in Infrastructure.	Actions from newly developed action plan delivered
		We will work collaboratively with our stakeholders, including the other Transmission Operators, throughout RIIO-T2 with the aim of assessing and managing capital carbon on our projects, driving efficiencies throughout our supply chain, and sharing best practice.	Support Sustainable Substation Innovation project
		We will, in collaboration with the other Transmission Operators, introduce a measurement tool for embodied carbon in new projects, in order to establish a baseline and set a reduction target.	Embedded Carbon Product Calculator in tender documentation for electrical assets - GIS, bulk buy and frameworks
		We will collaborate with our supply chain to implement sustainable project sites to reduce carbon and other impacts, for example energy efficiency, diesel use, re-use of materials and reducing impact of transportation.	Complete CEEQUAL assessment on Kincardine and Longannet
		We will collaborate with our supply chain to implement sustainable project sites to reduce carbon and other impacts, for example energy efficiency, diesel use, re-use of materials and reducing impact of transportation.	Create Action Plan to fill gaps found in CEEQUAL and deliver plan to close gaps
		We will work collaboratively with our stakeholders, including the other Transmission Operators, throughout RIIO-T2 with the aim of assessing and managing capital carbon on our projects, driving efficiencies throughout our supply chain, and sharing best practice.	Deliver Sustainable Substation Innovation Project (2023 programme)
		We will, in collaboration with the other Transmission Operators, introduce a measurement tool for embodied carbon in new projects, in order to establish a baseline and set a reduction target.	We will digitise the Carbon Product Calculator Tool
	Building Energy Use	We will implement energy efficiency measures as part of our RIIO-T2 building refurbishment programme at 48 substations (representing around 1/3 of our sites) with the aim of reducing energy consumption by more than 1000MWh per year.	Review monitoring information collected by Napier and build into substation energy use estimation methodology

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RIIO-T2	Embodied carbon	We will, in collaboration with the other Transmission Operators, introduce a measurement tool for embodied carbon in new projects, in order to establish a baseline and set a reduction target.	Pilot Causeway Tool and One-click LCA on selected projects - TBC(4)
	Supply Chain	We will further enhance environmental management standards and KPIs within contract specifications and supplier codes of conduct (including requirements for public disclosure of metrics) and cascade to all relevant suppliers.	Review data collected in SMARTwaste for agreed KPI metrics and develop targets for each metric for inclusion in future contracts.
		We will introduce consideration of environmental sustainability in our procurement processes in line with ISO20400 Sustainable Procurement Standard, including a carbon metric as a minimum.	Review Gap Analysis against the current procurement processes and identify actions to address remaining gaps
		We will require contractors and suppliers for all new contracts to become members and SCSS and undertake relevant sustainability and environmental training.	Review SCSS contract clause compliance of suppliers/contractors with contracts greater than 60K value and take remedial action where required
		We will target more than 80% of RIIO-T2 suppliers (by value) meeting these enhanced environmental standards.	Determine incremental annual targets to achieve 80% by March 2026
		We will target more than 80% of RIIO-T2 suppliers (by value) meeting these enhanced environmental standards.	Define methodology to identify supplier compliance and monitor % of suppliers by value meeting enhanced environmental standards
		We will engage with suppliers early in the development of projects to enable them to propose environmental improvements at concept and design stages	Implement Supply Chain Innovation Awards
		We will engage with suppliers early in the development of projects to enable them to propose environmental improvements at concept and design stages	Carry out gap analysis on current supplier engagement to identify opportunities for additional and/or improved engagement
		We will engage with suppliers throughout the duration of their contracts to continue to reduce impacts and optimise benefits	Produce an evidence based library to demonstrate enagagment with our contractors/suppliers
		We will target more than 80% of RIIO-T2 suppliers (by value) meeting these enhanced environmental standards.	Review delivery levels of the SCSS and SmartWaste contract requirements and the effectiveness of the associated Contractor Mngt processes.
		95% waste from landfill by 2023	Analysis of major projects and TOPs waste data (excluding compliance waste) and create a prioritisation plan for diversion from landfill
		Embed Circular Economy principles where relevant - consider whole life cycle environmental impacts	Create an opportunities register for circularity through the delivery of the sustainable substation project
		Embed Circular Economy principles where relevant - consider whole life cycle environmental impacts	Collaboration with Beama and the value chain and create an action list to improve carbon and circularity data on assets
		Embed Circular Economy principles where relevant - consider whole life cycle environmental impacts	Pilot resource exchange mechanism in collaboration with infrastructure organisations
		Revision of design process to include operational and End of life stages aiming to design out waste	ARRC Innovation Project, focusing on electrical assets - fill the gaps identified in the Discovery phase as part of the Sustainable Substation project

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	Sustainable Resource Use	We will set targets for recycled/reused materials as a % of total input materials to be achieved by end RIIO-T2, 2030 and 2050.	Baseline % recycled/reused civils materials (this was not possible in 2022 due to lack of available data)
		We will set targets for recycled/reused materials as a % of total input materials to be achieved by end RIIO-T2, 2030 and 2050.	Carry out a review of civils suppliers to analyse availability and % recycled content and cost differential if available.
		We will implement metrics to measure the sustainability of our resource use, with the aim of establishing a baseline to enable target setting during RIIO-T2.	Communicate with contractors the requirement to input materials data provision in Smartwaste, review compliance and create remedial plans if required.
		Revision of design process to include operational and End of life stages aiming to design out waste	Identification of key design processes in which to include circular considerations/ principles and development of action plan to revise as necessary
	Operational Transport	We will decarbonise our operational fleet by 2030, replacing 100% (over 800) of our cars and vans with electric alternatives in line with the Iberdrola EV100 commitment and will seek to further accelerate this to 2028.	Agree roadmap for 2023 with General Services (vehicles and charging infrastructure)
		We will decarbonise our operational fleet by 2030, replacing 100% (over 800) of our cars and vans with electric alternatives in line with the Iberdrola EV100 commitment and will seek to further accelerate this to 2028.	Deliver EVs in line with EV 2023 roadmap (Q4)
		We will install electric vehicle charging infrastructure for our operational fleet at our sites	Install EV charging infrastructure in line with EV 2023 roadmap
		We will strive to lead the decarbonisation of fleet vehicles, working with suppliers and other fleet operators to pilot technically viable alternatives to drive technical advancements and early adoption.	Identify barriers to achieving RIIO2 EV targets, develop actions to address and identify risks to targets (EV 100 roll out, Science Based Targets, Net Zero etc) where relevant
		We will decarbonise our operational fleet by 2030, replacing 100% (over 800) of our cars and vans with electric alternatives in line with the Iberdrola EV100 commitment and will seek to further accelerate this to 2028.	We will support the delivery of a Utility roadmap, including a gap analysis and assessment of intervention options to support utility fleet decarbonisation between now and 2050
	SF6	We will continue to carefully manage our assets in line with our SF6 Strategy to minimise SF6 leakage, repair leaks quickly, and where this is not possible, replace the asset before its anticipated end of life.	Seek to ensure all SF6 data returns are loaded in to the corporate system (SAP) and investigate holding non-logistical spares data in the same system.
		We will continue to carefully manage our assets in line with our SF6 Strategy to minimise SF6 leakage, repair leaks quickly, and where this is not possible, replace the asset before its anticipated end of life.	Launch new SF6 Application to record gas top ups and transition process in to business as usual
		Where a repair to a leaking asset proves ineffective and the asset requires to be	Engage with SP to set up Offsetting Framework and Offset Torness emissions
	Science Based Targets & Net Zero	We will collaborate with our supply chain and other Transmission Operators to drive scope 3 and embodied carbon footprint reductions.	Review embodied carbon data from projects to assess reduction opportunities

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	Targets & Net Zero Target	We will deliver efficient and economic actions to reduce our scope 1, 2 & 3 business carbon footprint by 67.2% by 2035 from a 2018/19 baseline, in line with validated Science-Based Targets aligned to a 1.5°C pathway.	We will improve our Scope 3 reporting methodology in line with Planet Mark recommendations
	Biodiversity	We will deliver 10% enhancement of biodiversity on 25 hectares across our existing network, on our non-operational land and existing linear infrastructure through collaboration with landowners, communities and local wildlife groups	Set minimum size criteria for site investigation, guide the collation of site data including GIS maps to establish baseline of potential sites using natural capital tool
We will deliver 10% enhancement of biodiversity on 25 hectares across our existing network, on our non-operational land and existing linear infrastructure through collaboration with landowners, communities and local wildlife groups		Establish guidelines for the creation of enhancement on owned and non owned land	
We will deliver 10% enhancement of biodiversity on 25 hectares across our existing network, on our non-operational land and existing linear infrastructure through collaboration with landowners, communities and local wildlife groups		Commence delivery of one pilot biodiversity enhancement project	
Environment Act and Planning stipulations BNG readiness		Carry out a baseline biodiversity unit assessment of all projects which require planning and ecological surveys and assess impact on biodiversity when landscape plans are available	
Environment Act and Planning stipulations BNG readiness		Create a record of current planning requirements related to biodiversity	
We will implement a Biodiversity & Natural Capital Action Plan process to guide local operation implementation with the aim of increasing environmental value across our network.		Contribute towards reviewing the Biodiversity and Natural Capital Action Plan Development, promotion and training. Identify and implement necessary process changes in collaboration with ED2 Process WG.	
We will implement a Biodiversity & Natural Capital Action Plan process to guide local operation implementation with the aim of increasing environmental value across our network.		Identify and implement necessary process changes in collaboration with ED2 Process WG.	
We will collaborate with stakeholders, including other DNOs, throughout RIIO-ED2 to develop and pilot robust methodologies and tools for delivering Biodiversity and Natural Capital assessment.		Create and implement process of carrying out BNG assessments through discussion with other DNOs, pilot on two projects.	
We will collaborate with stakeholders, including other DNOs, throughout RIIO-ED2 to develop and pilot robust methodologies and tools for delivering Biodiversity and Natural Capital assessment.		Contribute to project with the Scottish Linear infrastructure environmental group to develop an approach to biodiversity assessment in Scotland in line with external timelines	
We will identify, and subsequently monitor and annually report, metrics to track the levels of biodiversity and value of natural capital and ecosystem services on our sites and the achievement of our targets.		Procurement of natural capital tool and promote its use to other DNOs	
We will form strategic partnerships with local ecological protection organisations to support our activities to improve habitats for wildlife and to support people's access to nature.	Contribute to development of a stakeholder engagement process that works across SPEN		

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		We will implement a Biodiversity & Natural Capital Action Plan process to guide local operation implementation with the aim of increasing environmental value across our network.	Work with ED2 biod wg to identify processes and required changes to embed developed biod/nat cap approaches and tools in relevant SPEN processes
		We will deliver 10% enhancement of biodiversity on 25 hectares across our existing network, on our non-operational land and existing linear infrastructure through collaboration with landowners, communities and local wildlife groups	Create and publish Biodiversity Action Plan
	Supply Chain	We will further enhance environmental sustainability standards and performance metrics in our contracts by 2023 and will collaborate with our supply chain to target more than 80% of RIIO-ED2 suppliers (by value) meeting these standards.	Review Part 4 Project Management to update sustainability section with ED2 requirements
We will further enhance environmental sustainability standards and performance metrics in our contracts by 2023 and will collaborate with our supply chain to target more than 80% of RIIO-ED2 suppliers (by value) meeting these standards.		Introduce contract management process to track delivery of contract requirements and delivery of performance metric targets.	
We will further enhance environmental sustainability standards and performance metrics in our contracts by 2023 and will collaborate with our supply chain to target more than 80% of RIIO-ED2 suppliers (by value) meeting these standards.		Determine incremental annual targets to achieve 80% by March 2028	
We will continue to be a Supply Chain Sustainability School Partner, requiring contractors and suppliers for all new contracts to become members and undertake relevant sustainability and environmental training.		Implement process to ensure supply chain compliance with SCSS requirements and determine incremental annual target	
1 - We will engage with suppliers early in the development of projects to enable them to propose environmental improvements at concept and design stages. 2 - We will engage with suppliers throughout the duration of their contracts to continue to reduce impacts and optimise benefits.		Develop a Supply Chain Engagement Plan, including engagement from development and design stage to throughout the delivery of the contracts	
We will increase consideration of environmental sustainability in our procurement processes in line with ISO20400 Sustainable Procurement Standard, including a carbon metric as a minimum.		Review Gap Analysis taking into consideration actions addressed in ED2 Readiness and up to Q3. Identify the gaps that can be filled considering the Global procurement process and policies and embed required action	
We will increase consideration of environmental sustainability in our procurement processes in line with ISO20400 Sustainable Procurement Standard, including a carbon metric as a minimum.		Work with ED2 Supply Chain WG to agree and embed actions to address identified gaps in application of ISO20400 process	

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RIIO-ED2	Science Based Targets & Net Zero Target	We will require strategic suppliers to set Science-Based Targets within 5 years, aiming for 80% of our supply chain by value.	Develop a process to require strategic suppliers to sign up for Science Based Targets (or agreed externally validated equivalent) during ED2 and develop a monitoring process to track progress.
		We will implement processes for carbon management in relevant business activities, aligned with PAS 2080 Carbon Management in Infrastructure.	Develop action plan to address PAS2080 gaps identified by ED2 Carbon WG to embed carbon considerations in business processes
		We will achieve Carbon Neutrality by 2023 for our Scope 1 & 2 business carbon footprint excluding Losses.	Engage with SP to set up Offsetting Framework and pilot offsetting strategy for RIIO-ED2
		We will identify metrics, and associated targets, for RIIO-ED2 to track the impact of implementing actions and the overall progress towards our carbon reduction targets.	Undertake a detailed analysis to forecast annual emissions based on our current initiatives and compare to our reduction targets to understand potential areas of concern
		We will implement processes for carbon management in relevant business activities, aligned with PAS 2080 Carbon Management in Infrastructure.	Map carbon management requirements against current Distribution infrastructure delivery processes in a Carbon Management Plan - to understand what needs to be changed in order to align with PAS 2080 Carbon Management in Infrastructure.
		We will minimise our carbon footprint to achieve Net Zero carbon by 2035.	We will develop a Net Zero Strategy aligned to an appropriate Net Zero Standard
		We will deliver efficient and economic actions to reduce our scope 1, 2 & 3 business carbon footprint by 67.2% by 2035 from a 2018/19 baseline, in line with validated Science-Based Targets aligned to a 1.5°C pathway.	We will improve our Scope 3 reporting methodology in line with Planet Mark recommendations
	Operational Transport	We will decarbonise our operational fleet by 2030, replacing 100% (over 800) of our cars and vans with electric alternatives in line with the Iberdrola EV100 commitment and will seek to further accelerate this to 2028.	Agree roadmap for 2023 with General Services (vehicles and charging infrastructure)
		We will decarbonise our operational fleet by 2030, replacing 100% (over 800) of our cars and vans with electric alternatives in line with the Iberdrola EV100 commitment and will seek to further accelerate this to 2028.	Deliver EVs in line with EV 2023 roadmap (Q4)
		We will install electric vehicle charging infrastructure for our operational fleet at our sites	Install EV charging infrastructure in line with EV 2023 roadmap
		We will strive to lead the decarbonisation of fleet vehicles, working with suppliers and other fleet operators to pilot technically viable alternatives to drive technical advancements and early adoption.	Identify barriers to achieving RIIO2 EV targets, develop actions to address and identify risks to targets (EV 100 roll out, Science Based Targets, Net Zero etc) where relevant
		We will decarbonise our operational fleet by 2030, replacing 100% (over 800) of our cars and vans with electric alternatives in line with the Iberdrola EV100 commitment and will seek to further accelerate this to 2028.	We will support the delivery of a Utility roadmap, including a gap analysis and assessment of intervention options to support utility fleet decarbonisation between now and 2050
	Business Transport	We will continue to implement our 2021 Business Travel Policy to reduce business travel emissions by at least 580 tCO ₂ e during RIIO-ED2.	Explore ways to track this
		We commit to reporting on total SF ₆ Bank and leakage reduction rates using a common Distribution Network Operator (DNO) methodology.	Agree / develop a common Distribution Network Operator (DNO) SF ₆ Reporting Methodology for use in DNO AERs.

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	SF6	We will continue to carefully manage our assets in line with our SF6 Strategy to minimise SF6 leakage, repair leaks quickly, and where this is not possible, replace the asset before its anticipated end of life.	Seek to ensure all SF6 data returns are loaded in to the corporate system (SAP) and investigate holding non-logistical spares data in the same system.
		We will continue to carefully manage our assets in line with our SF6 Strategy to minimise SF6 leakage, repair leaks quickly, and where this is not possible, replace the asset before its anticipated end of life.	Launch new SF6 Application to record gas top ups and transition process in to business as usual
	Generators	We will analyse our generator use and set targets for reduction in carbon emissions to be achieved by end of RIIO-ED2.	Implement improved tracking system for generators and associated fuel consumption, establishing a baseline and setting a target improvement for RIIO-ED2
	Building Energy Use	We will reduce energy consumption by a total of 3.4GWh at 650 of our primary substations by applying our recently updated civil specifications (including improvements to heating, lighting and insulation).	Develop an action plan to deliver energy efficiency improvements at 650 primary substations during ED2, including a methodology to quantify energy consumption reductions delivered.
		We will reduce energy consumption by a total of 3.4GWh at 650 of our primary substations by applying our recently updated civil specifications (including improvements to heating, lighting and insulation).	Deliver energy efficiency improvements at 2023 target number of Primary substations
		We will refurbish 8 of our strategic office and depot sites, implementing energy efficiency measures to achieve BREEAM ratings of 'excellent' for new build and 'very good' for refurbishments, to reduce consumption by 11.7GWh over the RIIO-ED2 period.	Work with General Services to agree programme for delivery of 8 depot refurbishments/new builds to achieve targeted BREEAM ratings and energy consumption reduction.
		We will refurbish 8 of our strategic office and depot sites, implementing energy efficiency measures to achieve BREEAM ratings of 'excellent' for new build and 'very good' for refurbishments, to reduce consumption by 11.7GWh over the RIIO-ED2 period.	Agree specifications for Depot refurb/new builds to deliver target BREEAM ratings, and deliver progress as required by programme for Depot works.
	Embodied carbon	We will introduce a measurement tool for embodied carbon and other capital carbon emissions to establish a baseline and a set a target to reduce carbon on new projects during RIIO-ED2.	Pilot Carbon and Resource Measurement Tools on different Distribution projects / frameworks
		We will work collaboratively with our stakeholders, including the other Distribution and Transmission Network Operators, throughout RIIO-ED2 with the aim of assessing and managing capital carbon on our projects, driving efficiencies throughout our supply chain, and sharing best practice.	Deliver BEAMA Carbon Roadmap
		We will monitor and report on embodied carbon in new projects.	Develop and implement methodology to report embodied carbon in next year's AER.
		We will create a new role in RIIO-ED2 to drive actual reduction in Scope 3 carbon emissions in our supply chain by 100k tCO2e	Hire in line with commitment
		We will divert 100% of our waste from landfill by 2030, excluding compliance waste.	Collation and gap analysis of SPD and SPM waste data through the Carbon WG
		We will establish a baseline and targets for waste reduction per £1m of total annual expenditure, to be achieved by the end of RIIO-ED2 and 2030 in line with our zero waste to landfill date.	Develop methodology for baseline of waste per £1m of total expenditure and set target through the Carbon WG

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	Sustainable Resource Use	We will set targets for recycled & reused materials as a % of total input materials to be achieved by end RIIO-ED2 and 2030.	Baseline % recycled/reused civils materials and set target
		We will follow an appropriate, recognised standard such as BS8001 to embed circular economy principles where relevant throughout our business processes.	Carry out a comparison between BS8001 and Circulitics, choose one to use as a standard and baseline.
		We will continue to collaborate with environmental/ waste regulators, other infrastructure companies and our supply chain to drive sustainable resource use	Contribute towards the development of the sustainable substation innovation collaboration project to create an opportunities register for circularity
		We will follow an appropriate, recognised standard such as BS8001 to embed circular economy principles where relevant throughout our business processes.	Identify the business processes to embed circular economy principles and create a timeline for updates
	Losses	In RIIO-ED2, we will continue to implement our Losses Strategy to avoid an estimated 33 GWh of network losses, thereby limiting losses to a lower level than would otherwise be the case.	Introduce a delivery mechanism for the ED2 Losses Strategy, including allocation of responsibilities and a delivery tracking approach.
		We will use a minimum underground mains cable size of 300mm2 to further reduce losses, where it is cost effective and appropriate to do so.	Update standards & specifications for cable size
	Achieving the sustainability step-change	We will improve the quality of environmental data collected and analysed at all stages of the asset lifecycle, investing in enhanced IT systems and formalising data sharing collaborations with key stakeholders.	Create Sustainability Data & Reporting Strategy
		We will improve the quality of environmental data collected and analysed at all stages of the asset lifecycle, investing in enhanced IT systems and formalising data sharing collaborations with key stakeholders.	Finalise the Data and Reporting Matrix - detailing all metrics, reports and sources of sustainability data
		We will continue to provide transparent reporting of our environment & sustainability performance by publishing an annual report against all environmental and sustainability commitments	Develop guidance document for AER format and metrics in collaboration with other DNO's
		We will improve the quality of environmental data collected and analysed at all stages of the asset lifecycle, investing in enhanced IT systems and formalising data sharing collaborations with key stakeholders.	Data processes that require changes for ED2 identified
We will improve the quality of environmental data collected and analysed at all stages of the asset lifecycle, investing in enhanced IT systems and formalising data sharing collaborations with key stakeholders.		IESR process agreed	
Business Transformation	Business Transformation	Business Transformation	Active sponsorship of one area of sustainability per Director
		Business Transformation	Year of Sustainability activity - organise an event or send out a communication on a sustainability subject area.
		Business Transformation	All SPEN Executive to complete Climate Literacy course by the end of 2023
		Business Transformation	Managing with Environmental Sustainability' and 'Leading with Environmental Sustainability' leaders courses implemented and attended by SPEN leaders as per 2023 Training Plan

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		Business Transformation	Directors undertake two site visits in 2023 to include environmental checklist audit at depots/sites/ projects
		Business Transformation	Named Directors undertake Executive Depot ISO 14001 preparation visit by the end of 2024

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