



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 supplier¹ 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. 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 Standard² and Guidance³, and all 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.

A template for the Carbon Reduction Plan is set out below. Please complete and publish your Carbon Reduction Plan in accordance with the reporting standard published alongside this PPN.

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

²Technical 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

³Guidance 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

Supplier name: Operose Health

Publication date: 30 January 2026

Commitment to achieving Net Zero

Operose Health Limited, and the wider group, remains firmly committed to achieving Net Zero emissions by 2040, five years ahead of the ambitions set out in the NHS Net Zero Plan. As part of this commitment, we are targeting Net Zero Carbon (NZC) for Scope 1 and Scope 2 emissions by 2035, again exceeding NHS timelines for emissions within our direct control.

This Carbon Reduction Plan is aligned with Operose Health Limited's overarching Net Zero commitment, with all emissions data presented on a consolidated basis and referred to throughout as Operose Health.

We recognise the intrinsic link between environmental sustainability and population health. As a provider of NHS primary care services to 700,000 patients, we have a responsibility to minimise environmental impact while supporting improved health outcomes. Our Net Zero ambition is therefore not only an environmental priority but also a core component of delivering high-quality, sustainable healthcare services across the communities we serve.

Our approach is aligned with the NHS England Net Zero Supplier Roadmap and the Greener NHS programme, ensuring that our carbon reduction trajectory, reporting methodology, and supplier engagement processes meet current and emerging NHS commissioning requirements.

Baseline Emissions Footprint

Baseline emissions represent the greenhouse gas emissions generated prior to the implementation of formal carbon reduction strategies. These figures provide the benchmark against which future reductions are measured and performance is tracked over time.

Baseline Year: 2024

Additional Details relating to the Baseline Emissions calculations.

Operose Health considered the following emissions and source metrics in developing the emissions baseline.

Scope	Emissions	Description
1	Gas	Combined data from energy bills and estimates for managed properties from occupancy cost ratios.
2	Electricity	Combined data from energy bills and estimates for managed properties from occupancy cost ratios.

3	Transmission and distribution of national grid electricity	Transmission and distribution of electricity (T&D) losses, which occur between the power station and site
3	Business Travel	Business mileage from fuel receipts and public transport including trains, air travel and buses.

The following elements of Scope 3 are not currently reported within the carbon reduction plan but are on the development plan for inclusion in 25/26 and onward reporting:

Scope	Emissions	Description
3	Upstream Transport and Distribution	Operational supplies including clinical equipment, clinical consumables and office equipment and consumables.
3	Waste Generated in Operations	Clinical waste and general waste
3	Employee Commuting	Employee travel to and from place of work.

The following element of Scope 3 reporting is not reported as it is not considered to be relevant to the business operations of Operose Health.

Scope	Emissions	Description
3	Downstream Transport and Distribution	Operational supplies including clinical equipment, clinical consumables and office equipment and consumables.

Operose Health has seen a period of substantial growth since the initial baseline of y/e 2021 and as such we have adopted 2024 as the as the new baseline for reporting but provide detail on from 2021 within our reported statistics below. Adopting 2024 as the baseline enables us to provide a clearer report on our relative progress against carbon reduction activities and achieving our aim of achieving Net Zero Carbon emissions by 2040.

Baseline year emissions: 2024

EMISSIONS	TOTAL (tCO ₂ e)		
Scope 1	364		
Scope 2	427		
Scope 3	37		
	<table border="1"> <tr> <td>1. Purchased goods and services</td> <td>N/A</td> </tr> </table>	1. Purchased goods and services	N/A
1. Purchased goods and services	N/A		

(Included Sources)	2. Capital goods	N/A
	3. Fuel and energy related activities	N/A
	4. Upstream transportation & distribution	37
	5. Waste generated in operations	N/A
	6. Business travel	N/A
	7. Employee commuting	N/A
	8. Upstream leased assets	N/A
	9. Downstream transportation & distribution	N/A
	10. Processing of sold products	N/A
	11. Use of sold products	N/A
	12. End-of-life treatment of sold products	N/A
	13. Downstream leased assets	N/A
	14. Franchises	N/A
	Total Emissions	828

Current Emissions Reporting

Reporting Year: 2025																								
EMISSIONS	TOTAL (tCO₂e)																							
Scope 1	286																							
Scope 2	505																							
Scope 3 (Included Sources)	45	<table border="1"> <tr> <td>1. Purchased goods and services</td> <td>N/A</td> </tr> <tr> <td>2. Capital goods</td> <td>N/A</td> </tr> <tr> <td>3. Fuel and energy related activities</td> <td>N/A</td> </tr> <tr> <td>4. Upstream transportation & distribution</td> <td>45</td> </tr> <tr> <td>5. Waste generated in operations</td> <td>N/A</td> </tr> <tr> <td>6. Business travel</td> <td>N/A</td> </tr> <tr> <td>7. Employee commuting</td> <td>N/A</td> </tr> <tr> <td>8. Upstream leased assets</td> <td>N/A</td> </tr> <tr> <td>9. Downstream transportation & distribution</td> <td>N/A</td> </tr> <tr> <td>10. Processing of sold products</td> <td>N/A</td> </tr> <tr> <td>11. Use of sold products</td> <td>N/A</td> </tr> </table>	1. Purchased goods and services	N/A	2. Capital goods	N/A	3. Fuel and energy related activities	N/A	4. Upstream transportation & distribution	45	5. Waste generated in operations	N/A	6. Business travel	N/A	7. Employee commuting	N/A	8. Upstream leased assets	N/A	9. Downstream transportation & distribution	N/A	10. Processing of sold products	N/A	11. Use of sold products	N/A
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11. Use of sold products	N/A																							

		12. End-of-life treatment of sold products	N/A
		13. Downstream leased assets	N/A
		14. Franchises	N/A
Total Emissions	835		

Performance in year

Performance over the year shows a nominal total increase of 7 tCO₂e. This is a positive outcome, reflecting the growth of the business during the period, which included the addition of fourteen operational buildings across the country. Notably, this increase is significantly below our projected rise of 168 tCO₂e associated with that growth.

Emissions reduction targets

To maintain momentum towards our Net Zero ambition, Operose Health has established clear and measurable carbon reduction targets.

We are committed to achieving:

- **Net Zero Carbon for Scope 1 and Scope 2 emissions by 2035**
- **Net Zero Carbon for Scope 3 emissions by 2040**

Both targets are set five years ahead of the NHS Net Zero trajectory.

Current reporting does not yet capture the full scope of Scope 3 emissions. Based on our operational profile and services, we have revised our estimate that full Scope 3 inclusion will account for approximately 250 tCO₂e (a reduction down from 500 tCO₂e). This estimate has been incorporated into our forward planning and reduction modelling.

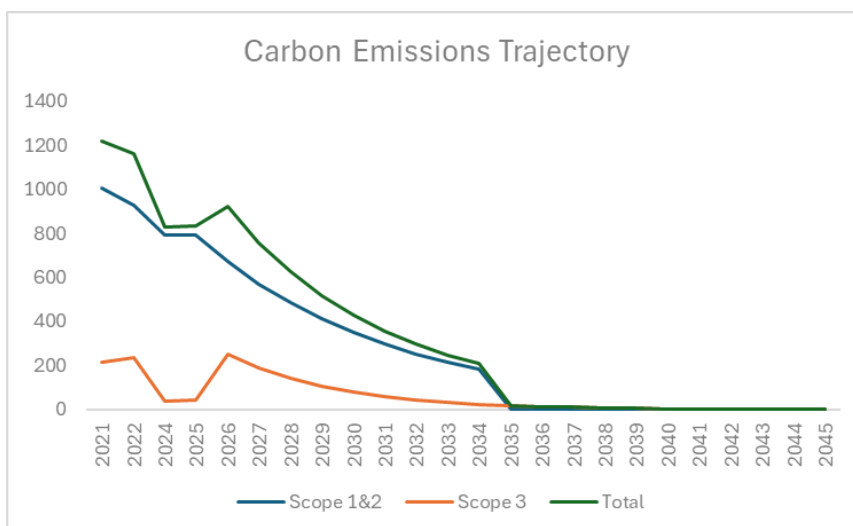
Using this expanded baseline, we project a reduction of 404 tCO₂e in total emissions from 835 tCO₂e in 2025 to 430 tCO₂e by 2030, representing a 51% reduction over the next 4 years. This trajectory reflects both operational efficiencies and the implementation of targeted carbon reduction initiatives.

We will prioritise high-impact Scope 3 categories including procurement, pharmaceuticals, and patient and staff travel, with a phased roadmap to achieve full Scope 3 reporting coverage in line with NHS expectations.

Progress will be tracked against defined key performance indicators (KPIs), including energy intensity (kWh/m²), proportion of estate on green energy tariffs, supplier compliance with Net Zero requirements, digital patient engagement rates, and reductions in clinical consumables and waste.

Based on current performance and planned interventions, we are confident in our trajectory to meet our 2035 and 2040 Net Zero commitments, subject to continued improvement in Scope 3 data completeness and supplier engagement.

Progress against these targets, alongside our longer-term pathway to 2040, is illustrated in the accompanying graph.



Carbon Reduction Projects

Completed Carbon Reduction Initiatives

Operose Health is a multi-site organisation employing approximately 1,800 colleagues across a large primary care estate. Over recent years, we have embedded a structured and measurable approach to environmental sustainability, aligned with NHS and government expectations, including PPN 06/21.

Since 2021, we have implemented a range of environmental management measures, initiatives and projects that have collectively delivered a 32% reduction in emissions, equating to a reduction of 382 tCO₂e.

Key initiatives include:

- Completion of Display Energy Certificates (DECs) across sites to improve visibility of energy performance and support behavioural change.
- Energy auditing and ESOS assessments to identify and prioritise efficiency improvements.
- Upgrading energy metering infrastructure to improve accuracy of monitoring and reporting.
- Engagement of specialist energy consultancy support to benchmark suppliers and identify greener energy opportunities.
- Closure of the corporate head office, significantly reducing travel-related emissions and estate energy use.
- Introduction of sustainable travel schemes, including cycle-to-work and electric vehicle leasing options.
- Promotion of flexible working for non-clinical colleagues and all corporate and back-office colleagues are now full-home workers to reduce emissions from commuting.
- Ongoing colleague engagement campaigns promoting energy efficiency and responsible resource use across all sites.

Locally led initiatives

To further embed sustainability at a community level, we have introduced locally driven environmental initiatives supported through our CARE Fund. Each practice can access up to £1,000 per year to deliver staff-led projects, including:

- Development of practice gardens and green spaces

- Biodiversity and pollinator-friendly planting schemes
- Participation in recognised initiatives such as NHS Forest tree planting and No Mow May
- Collaboration with local authority green teams

These initiatives are overseen by Net Zero leadership and the Social Value Board to ensure accountability, governance, and continuous improvement across our network. We will continue to monitor, refine, and expand these initiatives as part of our ongoing commitment to achieving Net Zero.

Future environmental measures, initiatives and projects – working towards Net-Zero by 2040

To sustain and accelerate our progress, Operose Health will implement the following measures from 2026 onwards:

Colleague awareness

We will appoint a Social Value Champion (SVC) for each new service that Operose Health provides to embed sustainability and social value across all contracts. SVCs will drive engagement, support data collection, and ensure alignment with organisational objectives.

As a locally embedded provider, approximately 80% of our 1,800 colleagues live within the communities and neighbourhoods they serve. This strengthens our ability to deliver meaningful and sustainable carbon reduction initiatives, as our workforce brings direct insight into local needs, behaviours, and opportunities.

This local employment model actively reinforces behaviour change, engagement, and community impact. Colleagues act as advocates for sustainable practices beyond the workplace, sharing knowledge and influencing positive environmental behaviours within their own communities, including family members, peers, and local networks.

Employing local people is a core component of our operating and social value model, ensuring that our approach to Net Zero is place-based, responsive, and impactful. This enables the identification and delivery of locally appropriate green initiatives, maximising both environmental benefits and long-term community outcomes.

We will influence staff to adopt sustainable practices, supported by training in waste management and carbon literacy, in the workplace and at home. We aim to add a Net Zero NHS e-learning for healthcare module to our workforce training platform. All colleagues transferred to Operose Health via a TUPE process will be provided with a reusable water bottle. Using a reusable water bottle instead of single use bottles saves the average person 94.4kg of carbon in a year.

Green energy supplies and estates

We will continue to transition directly managed properties to green energy tariffs and actively engage landlords to support similar changes across leased sites. Energy efficiency improvements, including LED lighting and smart systems, will continue to be prioritised.

Our estate strategy will align with NHS estate decarbonisation principles, focusing on energy efficiency, reduced reliance on fossil fuels, and optimisation of building utilisation across our portfolio.

As an at-scale provider of primary care, we recognise our responsibility to influence the environmental performance of the buildings from which we deliver services, including those not directly owned or managed by Operose Health.

When working in partnership with landlords and NHS commissioners to upgrade, refurbish, or develop new premises, we will use these opportunities to actively assess and improve the environmental performance of our estate. This includes reviewing how planned works can contribute to reducing carbon emissions, improving energy efficiency, and enhancing the overall energy rating of each building.

This approach will be embedded within all future estates projects, including new developments planned for 2026/27, ensuring that sustainability considerations are integrated at the earliest stages of design and delivery. Where feasible, we will seek to align developments with recognised standards such as BREEAM and relevant NHS Health Technical Memoranda (HTMs) and target a minimum Energy Performance Certificate (EPC) rating of B or above for new or significantly refurbished sites.

Through this, we aim to support NHS estate decarbonisation ambitions while delivering modern, efficient, and environmentally sustainable healthcare environments for our patients and colleagues.

Paper waste, clinical consumables and recycling

We will continue our transition to digital communications, reducing reliance on printing and postal services. Promotion of the NHS App will further support digital engagement with patients.

Our clinical consumables partnership will reduce single-use plastics and ensure that packaging is recycled at the point of delivery, embedding circular economy principles across our supply chain.

Technology

Expansion of digital services, including the 'Dr iQ powered by Evergreen' platform, will reduce unnecessary patient travel. Our target is for 80% of registered adult patients to adopt digital access channels.

Flexible and remote working arrangements for corporate teams will remain in place, sustaining reductions in commuting and estate-related emissions.

Greener prescribing and practices

We will embed environmental sustainability into clinical governance and quality improvement processes, ensuring that low-carbon care pathways are considered alongside clinical effectiveness and patient outcomes.

We will utilise NHS England's Greener Prescribing Dashboard to identify improvement opportunities and support the adoption of lower carbon clinical alternatives, including inhalers.

Our 'gloves off' campaign will be introduced to each new service Operose Health mobilises and will reduce unnecessary glove usage across services, targeting a 30–35% reduction and significantly lowering plastic waste.

We will strengthen social prescribing pathways, supporting patients to access services that address environmental and social determinants of health, including fuel poverty, transport, and community-based support.

Scope 3 reporting and suppliers

We will enhance Scope 3 emissions reporting through improved supplier engagement and data collection, with a phased roadmap to full inclusion. Environmental performance will increasingly form part of procurement criteria, and we will prioritise partnerships with suppliers aligned to Net Zero objectives. We will not enter into agreements with suppliers who cannot demonstrate alignment with our carbon reduction expectations.

Measurement, reporting and assurance

Our carbon reduction activities will be:

- Measured using established methodologies aligned with PPN 06/21 and the GHG Protocol
- Monitored through practice-level data, contract governance, and annual carbon reporting
- Reported transparently to commissioners through routine performance reporting and social value frameworks, including TOMs
- Overseen by Net Zero leadership senior management, and the Social Value Board to ensure robust governance, accountability, and continuous improvement

Our approach is aligned with the Social Value Model, delivering measurable environmental and community benefits alongside core healthcare services.

An annual Net Zero progress report will be produced to evaluate performance, update emissions trajectories, and refine delivery plans.

Carbon offsetting

Where residual emissions remain after all feasible reductions have been implemented, we will consider high-quality, verified carbon offsetting solutions. This may include nature-based projects such as afforestation and habitat restoration, integrated into our strategy by 2035 where required.

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 standard⁴ and uses the appropriate Government emission conversion factors for greenhouse gas company reporting⁵.

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) Standard⁶.

This Carbon Reduction Plan has been reviewed and signed off by the board of directors (or equivalent management body).

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>

Signed on behalf of the Supplier:

A handwritten signature in black ink, appearing to read "Samantha Kane", written over a horizontal dotted line.

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Date:29 January 2026.....