CHSA
Cleaning and Hygiene Suppliers Association

Carbon Reporting: Q&A July 2025

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Q: What is the benefit of calculating my carbon emissions?

A: Calculating and reporting your carbon emissions will show where your CO2 emissions come from and will help you plan how to reduce your emissions; it is important for tackling the challenge of climate change and the drive towards Net Zero. Customers are increasingly demanding the data from their supply chains and often, reducing emissions can reduce costs.

Q: What are Scope 1, 2 and 3 emissions?

A: The Greenhouse Gas Protocol categorises a business' emissions based on the different aspects of the business into Scopes 1, 2 and 3. Scopes 1 and 2 are those emissions controlled by the company.

Scope 1 covers those emissions released directly from a company's controlled assets. This could be combustion of fuels for heating or company vehicles, or it could be the emissions released from industrial processes onsite.

Scope 2 emissions are those released indirectly from the company, for example through the purchasing of electricity for office spaces.

Scope 3 emission are indirect emissions out of the company's control and account for around 70% of a business' carbon footprint.

These emissions occur in the value chain, including both upstream and downstream. Examples of upstream emission origins are: purchased goods and services, waste management, and transportation & distribution from suppliers. Downstream emissions can originate from transportation and distribution to customers, leased assets, and end-of-life of sold goods.

Q: Is there an industry standard checklist of exactly what should be measured for each scope of emissions?

A: The Greenhouse Gas (GHG) Protocol defines the Scopes and what they cover - https://ghgprotocol.org/tools-resources - but there is no comprehensive, universally agreed and accepted checklist.

Q: What is the international standard, and should I align to it?

A: The international standard is ISO 14064. There are plenty of different schemes an organisation can align to, but supply chains are international and so ISO 14064 is likely to dominate and be expected by customers. There is value in aligning to ISO 14064 from the outset.

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Q: Are there standard methodologies for carbon calculation and reporting?

A: There are many methodologies for calculating carbon emissions and different perspectives on what should and shouldn't be included in the calculation. The CHSA's advice is to work with a consultancy able to adapt their approach to the needs of your business.

A variety of organisations will independently verify data. UKAS (United Kingdom Accreditation Service) is the 'gold standard' in the UK. UKAS is appointed by government, to assess and accredit organisations that provide services including certification, testing, inspection, calibration, validation and verification.

Q: Can calculators, formulas and tools be shared by the CHSA to create a supportive, cohesively compliance approach?

A: The CHSA is not able to advocate one calculator, formula or database over another. The advice is to work with an expert consultancy able to recommend the right approach for your specific business.

Q: Once an organisation has accounted for their Scope 1, 2 and 3 emissions per product and has moved on to full life cycle assessment emissions per product produced, how would the CHSA advise a uniform approach to the calculation per product category for life cycle assessments?

A: The CHSA does not advocate one methodology over another. Instead, the CHSA advocates an ethical approach:

- Be transparent.
- Publish the data and state any reduction in emissions.
- Provide evidence for the reduction in emissions.
- Obtain third-party verification to substantiate your claims.

Q: Which emission factor database would be recommended for calculating Scope 3 emissions?

A: It depends on where you are and what you're measuring. The Carbon Accounting Alliance is collaborating across the industry to produce guidance on which emissions factor databases are best for which use – created by carbon accountants, for carbon accountants. A beta site is under development that will list a lot of the most common databases: https://wiki.carbonaccountingalliance.com/index.php?title=Portal:Emission_Factors

Watershed (watershed.com) has published an emissions factors database, CEDA, for open-source use with attribution.

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DEFRA (The Government Department for Environment, Food and Rural Affairs) has published a set of emissions factors covering transport, materials, waste etc: https://ghgprotocol.org/Third-Party-Databases/Defra. The key is to quantify activity. For example, how many tonnes of paper or plastics are purchased and how many tonnes of product were sold and how far were they transported?

Q: For small to medium enterprises (SMEs) starting on their sustainability journey, is there a recommended roadmap of activities that demonstrates to customers / stakeholders the SME's commitment to providing sustainable products and reduce CO2 emissions?

A: The CHSA has published a process, available on the website. Step one is to understand the Greenhouse Gas (GHG) Protocols Scopes 1, 2 and 3. Next is to identify a partner consultancy who will be able to assist you with data collection and calculation. Then collect and verify the data. Verification adds credibility to the data, particularly if done by an organisation with UKAS accreditation. The final step is to develop and implement an effective carbon reduction plan, based on the data.

Q: There are regulations requiring large and quoted companies to report their emissions. Do you foresee similar regulations being introduced for SMEs or do you believe the pressure on SMEs will continue to be indirect, from elsewhere in the supply chain or specified in tenders?

A: There is currently no legal requirement on SMEs, generally defined as having fewer than 250 employees, to calculate carbon emissions.

The Streamlined Energy Carbon Reporting (SECR) regulations require UK quoted companies to report their global energy use in addition to their greenhouse gas emissions. They also require large unquoted companies and limited liability partnerships to disclose their annual energy use and greenhouse gas emissions and related information. The TDFC (Task Force on Climate-Related Financial Disclosure) reporting requirements are mandatory for large UK-registered companies and Limited Liability Partnerships that meet specific criteria. Large private companies with a turnover exceeding £500 million are also required to comply.

SECR is a relatively simple reporting requirement. The threshold maybe lowered to include SMEs. TCFD is complex and the threshold is unlikely to change. The SME Sustainability Data Reporting has been published by the Government for public consultation. There is a reasonable probability this will be endorsed by the UK Government. It will be a voluntary standard. The aim is to introduce consistency into the requests SMEs are getting from large companies. More information is available here: https://www.bankersfornetzero.co.uk/wp-content/uploads/2025/06/From-Burden-to-Benefit.pdf. Companies that align to this now will be ready if the SECR threshold is lowered.

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Q: Can you recommend any reference materials?

A: The UK Business Climate Hub is a good resource, designed specifically for SMEs. It is a Government supported portal: https://businessclimatehub.uk/become-a-net-zero-business/

SMEs can also make use of free carbon calculator tools, such as Clean Growth UK.

The EU has published guidance called Voluntary SME. It can be considered a sustainability standard. The UK is developing something similar - the SME Sustainability Data Reporting standard mentioned earlier. The intention is set out a consistent format and structure for reporting and so standardise the data being requested of SMEs by large organisation. It is currently out for consultation: https://www.bankersfornetzero.co.uk/wp-content/uploads/2025/06/From-Burden-to-Benefit.pdf.

NHS Supply Chain's requirements are detailed at PPN006 (formerly PPN06/21). This PPN sets out how to take account of Carbon Reduction Plans in the procurement of major central government contracts. https://www.gov.uk/government/publications/ppn-006-taking-account-of-carbon-reduction-plans-in-the-procurement-of-major-government-contracts

While the Greenhouse Gas Protocol framework for calculating Scope 1 and 2 emissions is relatively old, the guidance for the calculation of Scope 3 emissions is good.

Q: What are the trends across the industry for demonstrating sustainability / carbon reduction today and how may this change in the future?

A: Increasingly, organisations are being asked for data about their carbon emissions by customers and suppliers. In the UK Net Zero Census last year, data was gathered from 2,000+ organisations. 51% of manufacturers had been asked for carbon data by a customer. This data is often demanded at short notice and those who can't provide the data risk losing the contract. The carbon data must be available, but it can be simplistic. For example, companies can calculate their full carbon footprint and divide the figure by their turnover to establish a figure per million pounds. This figure can be multiplied by the spend of the customer to get an estimate of the emissions that relate to that customer. Carbon foot-printing is the next level of sophistication. This involves calculating and providing a figure for carbon emissions for each product.

There is a risk buyers make short term choices between different suppliers' products based on the disclosed carbon emission per product. Comparing the kilograms of carbon emissions per ton of product is not valid. It's important to review what is included in the calculation, whether the data has been verified and if there is a credible carbon reduction plan in place.

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In summary, the advice is to:

- Calculate and disclose information on carbon emissions.
- Develop a carbon reduction plan, aligned to the Net Zero standard of SBTI.
- Be transparent.

Customers tempted to compare per product carbon emissions between suppliers can interrogate the methodology and see the data is not comparable.

Q: I am a distributor. My Scope 3 emissions include the manufacturing of the products I sell, but these are the manufacturer's Scope 1 emissions. If we are both reporting carbon emissions, who takes account of those emissions, the distributor (as Scope 3) or the manufacturer (as Scope 1)? If we both account for the same emissions, but as different scopes, we are doubling up on how many emissions are being produced?

A: Yes, the existence of Scope 3 emissions means the responsibility for emissions is shared through supply chains. This is to encourage organisations to be mindful of their choices in what they buy and who from, and to motivate them to find ways to reduce downstream emissions as well by making their products easier to re-use / recycle etc.

Q: Who should include the emissions for the transport of the goods from the manufacturer to the distributor in their carbon reporting; the manufacturer or the distributor?

A: It can be either or both. The wide range of methodologies means there is no consistency. However, the purpose of carbon reporting is to drive down carbon emissions. Current best practice, therefore, is for both to calculate emissions for all goods in (raw materials in for manufacturers and product in for distributors) and goods out (product sold into distributor for the manufacturer and product sold to the customer for the distributor). This approach will provide valuable information each organisation can use to identify ways to cut carbon emissions.

Q: In which Scope does 'grey fleet' sit?

A: The 'grey fleet' comprises privately owned vehicles, not owned or leased by the company, that are used by employees for business purposes and for which the employees are compensated for mileage and other related expenses. The carbon emissions of 'grey fleet' fall within business travel in Scope 3.

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Q: As a distributor we have limited impact on what manufacturers do and even trying to direct customers to do the 'right' thing is difficult. Why are we being tasked with reductions when both customers and manufacturers don't want to?

A: Everyone is being tasked with reductions - this is a global challenge, requiring a global solution. You may feel you have limited influence, but if multiple distributors / large customers all challenge manufacturers, the manufacturers will start to listen, particularly if their competitors are innovating better quality, lower carbon products. It's also important to note, customers are increasingly asking for information on carbon emissions throughout the supply chain.

Q: There are some products only produced by a limited number of manufacturers or only a limited number of manufacturers produce them to the quality required. If those manufacturers refuse to provide their emissions data, should we just stop selling those products and close our businesses down?

A: Customers are increasingly demanding information on carbon emissions. Manufacturers that refuse will eventually have to respond. As the distributor in the middle, you will need to provide the emissions data or find alternative solutions.

Q: How do we gather and validate / verify Scope 3 emissions from international suppliers?

A: Where the calculations are estimated, check they have been approved by organisations like IEMA (Institute of Environmental Management and Assessment).

Q: Can I compare one organisation's carbon emissions to another's to see which emits the least?

A: It can be challenging to compare the carbon footprints of different organisations unless you are certain the measurement boundary and approach taken are the same or very similar. If one organisation is measuring emissions more robustly across all the Scopes, the overall emissions may appear higher when the reality is the other organisation is not measuring as much. The same is true for product lifecycle assessments. Generally, the most practical is to focus on how an organisation is progressing against its own targets and measurements, as the approach should remain broadly consistent.

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Q: Will some products be lower carbon than other products?

A: If the products are from different organisations, the carbon emissions are not comparable as there is no guarantee of the methodology used to calculate the emissions.

If the products are from the same organisation and the methodology consistent then yes, they can be compared. The calculations will include company specific and product specific emissions. The company specific emissions will be consistent across all that company's products. The product specific emissions, which include the sourcing of the raw materials, particular manufacturing techniques and packaging solutions, are not.

Q: If I have lower emissions, can I use this to attract new customers?

A: Directly comparing companies' emissions is likely to be problematic because of the variation in methodologies. Promoting your commitment to carbon reduction, highlighting the progress you have made and being transparent with your calculations can be differentials. The CHSA supports the following approach:

- State: state the reduction in emissions.
- Evidence: prove the reduction.
- Verify: obtain third-party verification to substantiate your claims.

Q: Can I just pay to offset and carry on?

A: Carbon offsetting is the reduction or removal of carbon emissions from the atmosphere to compensate for emissions made elsewhere. To offset its carbon emissions the organisation will pay another entity to reduce its carbon emissions. The reduction can then be counted towards the organisation's own climate targets. To be credible, it is important the carbon offsetting projects are verified by an independent third-party organisation. Carbon offsetting can be a useful option if it is not possible to reduce the emissions further. However, the purpose of carbon reporting is to reduce emissions and carbon offsetting does nothing to reduce the emissions of the organisation, potentially blocking any real reduction. Paying to offset emissions in the absence is an effective strategy to reduce emissions is greenwashing, which is against the CHSA's Code of Practice.

Q: Given the emphasis on reducing carbon, has there been any progress in comparing the carbon impact of biotech cleaning products versus traditional petrochemical-based ones? Are there verified figures that help contractors make informed choices?

A: Not to our knowledge. It is extremely difficult to compare carbon emissions across technology areas in this way because of the different methodologies used.

The CHSA's advice is evaluate the transparency of the organisation's approach, the quality of the data, and whether the data has been independently verified.

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