National Carbon Offset Standard Carbon Neutral Program Public Disclosure Summary



DEXUS Property Group

2014/15

Declaration

To the best of my knowledge, the information provided in this Public Disclosure Summary is true and correct and meets the requirements of the National Carbon Offset Standard Carbon Neutral Program.

[Sign here] [Date]

ZO-10-15

Paul Wall

National Sustainability and Operations Manager

Type of carbon neutral certification: Part of an organisation – DEXUS Corporate Operations comprising corporate travel for all DEXUS employees and DEXUS corporate tenancies in Sydney (located at Levels 24-26, 264 George Street, Sydney 2000), Melbourne (located at Level 1, 180 Flinders Street, Melbourne 3000 for 101 days of the period and located at Level 16, 385 Bourke Street, Melbourne 3000 for the entire period), and Brisbane (located at Level 21, 12 Creek Street, Brisbane 4000)

Verification

Date of most recent external verification/audit:

Auditor: Pricewaterhouse Coopers

Auditor assurance statement link:



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1. About DEXUS Property Group

DEXUS Property Group is one of Australia's leading real estate groups, investing directly in high quality Australian office and industrial properties. With \$19.1 billion of assets under management, DEXUS also actively manages office, industrial and retail properties located in key Australian markets on behalf of third party capital partners.

DEXUS manages a portfolio of 4.3 million square metres located predominantly across Sydney, Melbourne, Brisbane and Perth and is the largest owner of office buildings in the Sydney CBD, Australia's largest office market.

With nearly 30 years of expertise in property investment, development and asset management, the Group has a proven track record in capital and risk management, providing service excellence to tenants and delivering superior risk-adjusted returns for its investors.

DEXUS aims to maximise resource efficiency and minimise the overall environmental impact of operations. This approach is applied in the development of new properties and in the management and refurbishment of existing properties.

DEXUS has a proud record of developing and implementing leading practices in CR&S. As a responsible property investor, manager and developer, DEXUS integrates CR&S objectives across the property lifecycle to create long term value for its stakeholders including tenants, employees, investors, suppliers, community and the environment.

Experience has demonstrated that a holistic approach – from the boardroom to the plant room – reduces operating costs, enhances property values and improves tenant appeal, resulting in enhanced long term returns for investors together with lower environmental risks.

DEXUS adopts a balanced approach to addressing environmental, social and governance (ESG) issues. The Group utilises a CR&S framework through which it systematically identifies, quantifies and responds to ESG issues within strategic decision making and operations. For example, the DEXUS conducts ESG due diligence for property transactions, applies technology and operational expertise to reduce resource use and greenhouse gas emissions, partners with like-minded suppliers, and promotes diversity, equality and basic human rights.

As a signatory to the United Nations Principles of Responsible Investment (UNPRI), DEXUS has a commitment to invest responsibly and raise awareness of responsible investment with its stakeholders. In recognition of the UNPRI, DEXUS delivers CR&S benefits, keeping four guiding values at the forefront of its business:

- Investing responsibly, managing properties and consolidating property services
- Achieving positive environmental outcomes through business operations
- Identifying material issues through stakeholder engagement
- Delivering responsible outcomes for the community

The Group's commitment to sustainable performance has been recognised through the inclusion in a number of global benchmarks, including:

- Dow Jones Sustainability Index (World, Asia Pacific and Australia Indices)
- FTSE4Good Index
- Carbon Disclosure Project
- Global Real Estate Sustainability Benchmark

DEXUS is a founding member of the City of Sydney's Better Buildings Partnership and a member of the Investor Group on Climate Change.

2. Carbon neutral information

Carbon neutral certification

DEXUS is a signatory to Australia's Carbon Neutral Program which is administered by the federal Department of the Environment. Each year the Group develops an emissions inventory in line with the program's National Carbon Offset Standard (NCOS) across its Corporate Operations.

The Group has offset direct emissions from refrigeration and electricity usage and indirect emissions generated by waste to landfill, paper use, airline travel and car mileage for national employees, taxi travel, hire cars and employee commuting.

DEXUS's NCOS carbon footprint

DEXUS has prepared a greenhouse gas emissions inventory for the 2015 reporting period from 1 July 2014 to 30 June 2015.

Boundary and consolidation approach

DEXUS's NCOS boundary includes DEXUS corporate operations, which comprises facilities listed below that fall under DEXUS's operational control for all or part of the 2015 reporting period. The boundary also includes Scope 3 emissions relating to corporate travel for all DEXUS employees.

DEXUS has applied the principles contained within the National Greenhouse and Energy Reporting Act 2007 and its associated guidelines to determine the operational control of its properties across Australia and New Zealand.

Where DEXUS has operational control of a tenancy, it reports 100% of energy, water, waste and emissions applicable to that tenancy as well as an area-based proportion of base building operations.

DEXUS 2015 NCOS boundary includes:

- DEXUS office tenancies and proportion of base building services attributable to those tenancies, for the following locations:
 - Sydney Office: Levels 24-26, 264 George Street, Sydney 2000
 - Former Melbourne Office: located at Level 1, 180 Flinders Street, Melbourne 3000 for 101 days of the period
 - New Melbourne Office: Level 16, 385 Bourke Street, Melbourne 3000 for the entire period
 - Brisbane Office: Level 21, 12 Creek Street, Brisbane 4000
- Corporate travel and employee commuting for all staff employed directly by DEXUS nationally

The boundary excludes DEXUS's owned and managed investment property portfolio comprising office, retail and industrial properties.

Inventory standards and methods

DEXUS's methods and procedures for collecting, collating and calculating its greenhouse gas emissions and resource consumption are prepared in accordance with the following reporting standards:

- National Carbon Offset Standard (NCOS): Department of the Environment, Australia www.environment.gov.au
- The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition): World Resources Institute and World Business Council for Sustainable Development (www.ghgprotocol.org)
- National Greenhouse and Energy Reporting (NGER) Act 2007: Clean Energy Regulator, Australia www.cleanenergyregulator.gov.au

Emission factors and calculation methodology

Activity data has been collected from key data sources including utility invoices, reports provided by key suppliers (such as travel providers) and internally generated consumption reports (such as financial reports of expenses claimed).

Where possible, the emission factors and calculation methodologies have been taken from National Greenhouse Accounts (NGA) Factors, dated July 2014, which is aligned with Method 1 within NGER.

Where additional detail is required, DEXUS has used a number of other credible sources including 2015 Guidelines to Defra / DECC's 2015 Government GHG Conversion Factors for Company Reporting, June 2015; EPA Victoria Paper note, May 2011; and ABS Survey of Motor Vehicle use, 12 months ended 31 October 2012.

Greenhouse gases included within inventory

DEXUS has determined its emissions resulting from the common greenhouse gases reported under the Kyoto Protocol, being carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs) and sulphur hexafluoride (SF_6).

Emissions are aggregated into carbon dioxide equivalents (CO₂-e) using factors called global warming potentials (GWPs).

Emission sources within certification boundary -quantified sources

Table 1 lists the quantified emission sources that DEXUS has included within its 2015 NCOS greenhouse gas inventory.

Scope	Quantified emission source	Data collection source	
1 & 2	Tenancy electricity and gas consumption and associated transmission and distribution losses	Metered and invoiced by utility providers	
3	Share of base building electricity and gas consumption and associated transmission and distribution losses	Metered and invoiced by utility providers	
1	Tenancy refrigerant leakage	Estimated using default leakage rates of total equipment charge provided from facility managers and maintenance service providers	
3	Share of base building refrigerant leakage	Estimated using default leakage rates of total equipment charge provided from facility/centre managers and maintenance service providers	
3	Waste to landfill	Data provided by waste contractors	
3	Office paper consumed	Data provided from facility managers	
2	Onsite energy generation and purchase of renewable electricity	Data sourced from sub metering systems and GreenPower tracking spreadsheets	
3	Corporate air travel	Data provided by DEXUS's outsourced travel booking provider	
3	Corporate land based transport	Determined from invoices and transactions processed and paid via the DEXUS accounts payable system	
3	Employee commuting	Collected directly from DEXUS employees via surve	
3	Hotel accommodation	Determined from invoices and transactions processed and paid via the DEXUS accounts payable system	
3	Telecommunications	Determined from data relating to annual spend obtained from IT employees	
3	Water: Share of base building potable water consumption	Metered and invoiced by utility providers	
3	Wastewater: Share of base building wastewater for offsite treatment	Estimated as a proportion of water use (i.e. discharge factor) that metered and invoiced by utility providers	

cope	Quantified emission source	Data collection source
3	Office supplies and stationary	Determined from data relating to annual spend obtained from facilities management employees
3	Postage, courier and freight	Determined from data relating to annual spend obtained from facilities management employees
3	Food and catering	Determined from data relating to annual spend obtained from facilities management employees
3	IT equipment purchases	Determined from data relating to annual spend obtained from IT employees
3	IT data warehousing	Determined from data relating to annual spend obtained from IT employees

Non-quantified sources

Table 2 lists Scope 3 emission sources have not been quantified in line with the provisions in the NCOS. The impact of excluding these sources is not expected to materially affect the overall total emissions:

Scope	Non-quantified emission source	Reason for exclusion
3	Office printing	All internal printing is captured via emissions for paper use, office suppliers, IT and electricity use.
		External printing is not included as information is difficult to gather. DEXUS will review options to gather data for future reporting.
3	Cleaning services	Cleaning services is not included because the information is difficult to gather relative to estimated size of emissions.
3	Events and meals out	Events and meals out has been excluded as these activities relate to social functions rather than operations activities.

Diagram of certification boundary

DEXUS has expanded the boundary in this reporting period to also include emissions relating to its recently opened tenancy in Brisbane, as well several Scope 3 emission sources which are highlighted in the diagram below.

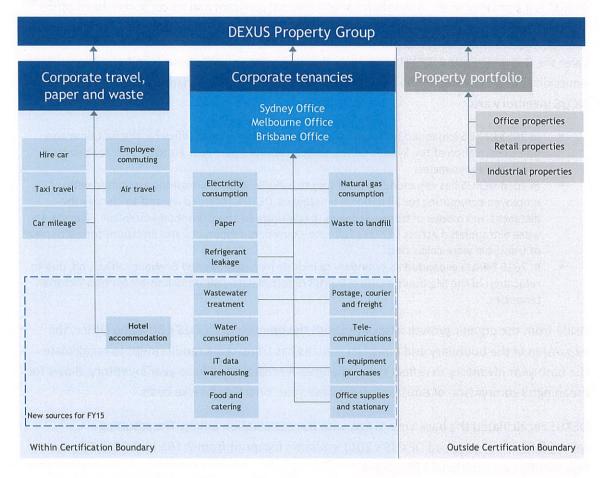


Figure 1: Diagram of the boundary of the subject of certification

3. Emissions reduction measures

Part A. Emissions over time

DEXUS is a signatory to the Australian Carbon Neutral program and its corporate head office has been certified as carbon neutral since 2011.

Over the five year period, DEXUS has expanded its inventory with regards to boundary and the emission sources covered. The key business events and reporting changes that impact DEXUS's NCOS inventory are:

- In 2013 DEXUS expanded its boundary to include its Melbourne Office for the first time and, due to relocation of the Sydney Office, DEXUS reported part-year emissions across two New South Wales tenancies.
- In 2014 DEXUS has expanded its inventory to include Scope 3 emissions associated with employee commuting for all national employees. DEXUS surveyed its staff to identify the distances and modes of transport taken to commute to and from their workplace. The results were extrapolated across DEXUS's full time-equivalent employees and emissions for each mode of transport were calculated.
- In 2015 DEXUS expanded its boundary to include its newly opened Brisbane Office and, due to relocation of the Melbourne Office, DEXUS reported part-year emissions across two Victorian tenancies.

Aside from the organic growth associated with the opening of DEXUS's Brisbane Office, the expansion of the boundary and emission sources has triggered a requirement to recalculate the base year inventory to reflect these changes. A recalculated base year inventory allows for meaningful comparison of emissions from base year, on a like-for-like basis.

DEXUS recalculated the base year in line with its recalculation policy. The resulting recalculation has increased DEXUS's 2011 emission footprint from 2,165 to 2,561 t.CO $_2$ -e, representing an additional 396 t.CO $_2$ -e.

Table 3 below summarises DEXUS's like-for-like emissions including its recalculated baseline.

Table 3. Like-for-like emissions since base year (including baseline recalculations and excluding new sources) FY11 Change % Base FY12 FY13 FY14 FY15 FY15 vs Year Base Year 2 Scope 1 2 2 1 1 -62% Scope 2 415 344 270 284 233 -31% Scope 3 comprising the following: 1,979 2,225 2,312 1,762 1,916 -14% tenancies and base building energy/refrigerants 619 603 444 348 431 -31% office paper use and waste 40 14 221 25 -37% corporate travel 1,202 1,373 1,021 1,009 1,040 -13% employee commuting 364 322 294 347 420 15% Avoided emissions from renewable -81 -66 -28 0 -16 energy purchased by DEXUS Total like-for-like emissions (t CO2-e) 2,561 2,593 2,223 1,995 2,186 -15%

A new baseline for FY15

In 2015 DEXUS has renewed its commitment to the carbon neutral program. Using guidance from the Department of Environment, DEXUS has reviewed its reported Scope 3 sources and has committed to expanding its boundary from 2015. The new boundary includes the following Scope 3 sources reported for the first time:

- Hotel accommodation
- Telecommunications
- Water: Share of base building potable water consumption
- Wastewater: Share of base building wastewater for offsite treatment
- Office supplies and stationary
- Postage, courier and freight
- Food and catering
- IT equipment purchases
- IT data warehousing

DEXUS has purchased and retired offsets for these additional sources in 2015.

Part B. Emissions reduction strategy

DEXUS Property Group is committed to continuous improvement under the ISO 14001 Environmental Management System which includes reducing resource consumption and the impact of climate change across the entire portfolio including DEXUS's corporate operations.

This is the Group's fifth reporting year under the NCOS Carbon Neutral Program, with a solid track record and carbon emissions reduction results as part of the ongoing resource monitoring, management and reporting framework.

The first reporting year under NCOS, FY11, which is also the base year, allowed DEXUS to communicate the footprint across the organisation. This year, DEXUS has recalculated the base year in line with the Base Year Recalculation Policy, dated July 2012; to allow comparison of emissions from base year, on a like-for-like basis.

DEXUS's emissions reduction strategy takes the form of a 'Tenancy Sustainability Plan'. The plan outlines key strategies, objectives and targets for a more sustainable office and is focused on six key areas which include liveability, information technology, office consumables and recycled content procurement, office energy consumption, recycling and waste and internal processes.

Part C. Emissions reduction actions

Over the last five years of DEXUS's involvement in the Carbon Neutral Program, DEXUS has achieved a total emissions reduction of 15% against its like-for-like recalculated baseline.

During that time DEXUS has also experience organic growth in the Group's full-time equivalent staff, which has increased from 289.5 FTEs to 334.0 FTEs, or 15%.

As a result, DEXUS has achieved a 26% reduction in emissions intensity per employee, which equates to 770 tonnes CO_2 -e of avoided emissions in 2015 against the 2011 baseline.

Emissions intensity peaked in 2012 at 10.1 tonnes CO₂-e per employee as DEXUS's restructured its workforce and from 2013 emissions intensity has continued to improve following the implementation of DEXUS's Tenancy Sustainability Plan.

	Base Year	FY12	FY13	FY14	FY15	Change % FY15 vs Base Year
Scope 1 & 2	336	280	244	233	270	-20%
Scope 3	2,225	2,312	1,979	1,762	1,916	-14%
Total like-for-like emissions	2,561	2,593	2,223	1,995	2,186	-15%
Employees (FTEs) as at 30 June each year	289.5	256.4	234.0	276.0	334.0	15%
Emissions Intensity (t. CO ₂ -e/FTE)	8.8	10.1	9.5	7.2	6.5	-26%

FY15 Projects

In FY15 DEXUS completed the following emissions reductions projects, resulting in 47 tonnes of avoided emissions against business as usual practices.

Year completed	Emissions source	Reduction measure	Scope	Status	Avoided electricity use (kWh)	Avoided emissions (t.CO ₂ -e)
2015	Tenant Electricity	Purchase of GreenPower for Sydney Office	2&3	Complete	0	16
2015	Tenant Electricity	Expanding the Sydney Office to take up part of Level 24	2&3	Complete	18,132	19
2015	Tenant Electricity	Relocating the Melbourne Office from 180 Flinders Street to 385 Bourke Street	2&3	Complete	8,991	12

GreenPower purchases

DEXUS implemented a purchase of certified GreenPower at its Sydney Office. DEXUS purchased 15,721 kWh of GreenPower, resulting in direct abatement of 16 tonnes CO₂-e.

Office relocations and refurbishments

Due to DEXUS's increase in employee numbers in FY14 and FY15, DEXUS focused its FY15 emissions reductions activities on:

- 1. Expanding the Sydney Office to take up part of Level 24
- 2. Relocating the Melbourne Office from 180 Flinders Street to 385 Bourke Street
- 3. Formally establishing the Brisbane Office at 12 Creek Street

For each of these fitouts, DEXUS has leveraged design elements that were first adopted in the new Sydney Office in 2013, which was designed to provide a work environment that enables collaboration, flexibility and choice.

The Flexible Work Environment (FWE) model office configuration reinforces the importance of face-to-face communication that is supported by an enhanced technology platform providing the latest communication solutions for faster decision making.

DEXUS's Sydney, Melbourne and Brisbane workspaces feature:

Centralised recycling

- Energy efficient T5 task and low voltage
- LED lighting
- Motion sensor meeting room lighting
- Laptop mobility
- Wireless technology
- Secure and robust remote access
- Dual screen monitors for all fixed workstations
- 12 wireless interactive screen display panels
- Follow-me printing on 6 printers (reduced from 18)
- Electronic document management
- Personal storage lockers
- Clean desk policy
- Collaborative telephone and video conferencing technology

Through the above sustainability initiatives, DEXUS has already demonstrated significantly reduced energy consumption and decreased reliance on printing and paper files.

4. Emissions summary

The table below lists DEXUS Property Group's FY15 gross and net greenhouse gas emissions for its corporate activities as per the stated boundary.

Where GreenPower is used, the total emissions from electricity are provided in the table for the total gross emissions and then the emissions from GreenPower are subtracted to calculate the net footprint. The total net emissions represent the amount of offsets required to achieve carbon neutrality.

GreenPower and carbon neutral products are separated to allow for tracking across years where GreenPower is not purchased and provide transparency regarding the total number of offsets required.

Scope	Emission source	t CO ₂ -e
1	Refrigerant leakage - tenancy	1
3	Refrigerant leakage - % of base building	7
2	Purchased electricity – tenancy (gross)	284
3	Purchased electricity - transmission and distribution losses (tenancy)	43
3	Purchased electricity – % of base building (gross)	315
3	Purchased electricity – % of base building transmission and distribution losses	47
3	Purchased natural gas – % of base building (gross)	16
3	Purchased natural gas – % of base building transmission and distribution losses	4
3	Transport Fuel – Air Travel	974
3	Transport Fuel – Taxi	33
3	Transport Fuel – Car Mileage	6
3	Transport Fuel – Hire Car	28
3	Transport fuel – Employee Commuting	420
3	Office paper use	8
3	Office waste to landfill	17
3	Telecommunications*	32
3	Water	1
3	Wastewater	2
3	IT Equipment*	80
3	Stationery*	12

Table 6	. 2015 Emissions Summary	
Scope	Emission source	t CO ₂ -e
3	Data Centre*	53
3	Postage*	4
3	Couriers*	16
3	Hotel accommodation	80
3	Food and catering*	135
Total Gr	oss Emissions	2,615
GreenPo	ower or retired LGCs	-16
Total Ne	et Emissions	2,599

^{*} These Scope 3 emissions have been calculated using the ISA calculator and account for approximately 12.7% of all emissions.

5. Carbon offsets

Part A. Offsets summary

In order to fully offset its FY15 emissions footprint of 2,599 t.CO₂-e, DEXUS Property Group has purchased and retired certified carbon offsets totalling 2,700 t.CO₂-e, which includes a contingency of 101 t.CO_2 -e to be retired as excess for this year.

Table 7 below provides details of purchased offsets and their retirement details.

Offset type and registry	Year retired	Serial numbers	Quantity
VCU (APX VCS Registry)	2015	4048-173222598-173223397- VCU-003-APX-IN-1-1023- 28032011-31122011-0	800
VCU (APX VCS Registry)	2015	2906-127171802-127172201- VCU-008-MER-KH-3-181- 01012012-31122012-0	400
VCU (APX VCS Registry)	2015	2657-116668116-116668367- VCU-016-MER-AU-14-587- 01032011-29022012-0	252
VCU (APX VCS Registry)	2015	2646-115073773-115074020- VCU-016-MER-AU-14-641- 01072011-15042012-0	248
ACCU (Australian National Registry of Emissions Units (ANREU))	2015	Serial range: 3,671,506,124 to 3,671,506,223	100
CER (Australian National Registry of Emissions Units (ANREU))	2015	Serial range: 848,034,973 to 848,035,872	900
Total offsets retired			2,700
Net emissions			2,599
Total offsets held in surplus fo	or future years:		0

Part B. Offsets purchasing and retirement strategy

DEXUS views its investment in carbon abatement projects as part of its overall sustainability approach and an extension of its own emissions reduction activities. DEXUS invests in projects that fall into one or more of the following criteria:

 Carbon abatement projects involving generation of renewable energy or energy from waste, which enables DEXUS to support the transition to cleaner energy sources

- Carbon abatement projects situated in Australia, which enables DEXUS to support carbon abatement in the geographical region in which DEXUS operates
- Carbon abatement projects that also give back to local communities in the form of income or through other social co-benefits such as improved health or livelihood

DEXUS's offsetting approach involves purchasing and retiring offsets in arrears at the end of each reporting year as follows:

- 1. DEXUS determines the amount of offsets to retire to encompass its annual emissions inventory for the current reporting year
- 2. DEXUS applies a contingency to round up its abatement
- 3. DEXUS partners with a broker to select carbon abatement projects that fit with DEXUS's offsetting goals
- 4. Certificates are purchased and retired immediately

Part C. Offset projects (Co-benefits)

Table 8 below describes the projects that DEXUS Property Group has chosen to support in FY15.

Table 8. Carbon abatement projects

Project: Tasmania Forestry Project, Australia

Description: This project promotes improved forestry management by bringing groups of local landholders together to protect areas of forest that would have usually been logged.

Co-Benefits:

- Project directly supports the rural community in Tasmania
- Win/win scenario promoting forest protection over logging whilst providing a lucrative income for landholders
- Risk management strategies in place reduce the risk of forests fires in the protected areas

FY15 offsets retired: 500



Table 8. Carbon abatement projects

Project: Jiangsu Rudong Biomass Power Generation, China

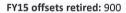
Description: The project adopts biomass direct combustion technology to utilise local surplus biomass residues (mainly, but not exclusively, rice straw, and wheat straw, and cotton stalk) for power generation.

The biomass fuels are collected at the straw-collecting stations at first, and then packed and transported to the project power plant.

The biomass fuels may be stored and then are shredded before being fed into the power generating system and burnt.

Co-Benefits:

- Creates employment opportunities for both the construction and ongoing operation of the biomass project
- Increases support for local farmers giving them financially rewarding options as opposed to discarding their biomass



Project: Madhya Pradesh Wind Project, India

Description: This project promotes the sustainable development of the wind industry by bringing investors together, with small to medium power requirements, to invest in wind technologies.

The project activity is develop and operate ten 1.5 MW grid-connected wind power generators located at villages within the state of Madhya Pradesh in India.

Co-Benefits:

- Consists of ten x 1.5 MW Wind Turbine Generators (WTGs)
- Estimated to generate 25,529 MWh of clean electricity annually
- Improved standard of living and local employment opportunities for local communities
- Facilitate availability of infrastructure like electricity, roads, medical facilities etc.

FY15 offsets retired: 800



Image source: Netherlands Enterprise Agency | Sector report biomass energy Jiangsu Province



Table 8. Carbon abatement projects

Project: Fuel-efficient cookstoves, Cambodia

Description: The project was initiated as part of the Cambodian Fuel-wood Saving Project (CFSP), which was created to reduce the wood consumption in Cambodia in order to protect its forest resources. The ultimate goal of the project is to facilitate a nationwide shift from inefficient exploitation of fuel wood to sustainable and efficient biomass use.

Co-Benefits:

- Avoidance of overexploitation of the forests
- Reduction of airborne particles emission and associated respiratory diseases
- Time saving in fire wood collection
- Reduction of purchased fuel costs
- Transfer of technology to indigenous people and creation of employment opportunities.

FY15 offsets retired: 400

Project: Savannah burning, Northern Australia

Description: The project reduces emissions from savannah fires by shifting burning from the late dry season (approximately October - November) towards the early dry season (approximately March - April), and Reducing the area that is burnt each year.

Practices employed by traditional owners, such as controlled savannah burning help control the incidence of large fires occurring during the dry season and decrease the amount of methane and nitrous oxide emissions into the atmosphere.

Careful early dry season burning can reduce fuel loads and create burnt firebreaks in the landscape. Fire breaks alongside roads or watercourses help to reduce the risk of hot fires spreading in the late dry season.

Co-Benefits:

- Reduces air pollutants associated with the combustion of wood and native fuels, such as sulphur and nitrogen oxides, and particulate
- Indigenous co-benefits also involve helping to protect sacred sites through appropriate fire management practices, employing local traditional owners as rangers, encouraging the re-introduction of rare or endangered wildlife or simply enabling people to be on country so the younger generation can learn from their elders

FY15 offsets retired: 100

