CWGC ENVIRONMENTAL SUSTAINABILITY REPORT 2025



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COMMONWEALTH WAR GRAVES

FOREWORD

In a world increasingly defined by environmental impact, the Commonwealth War Graves Commission (CWGC) stands at a unique intersection of heritage, remembrance, and sustainability. Our mission—to honour the memory of the men and women who died in the two World Wars—has always been rooted in care, dignity, and respect. Today, those values extend beyond the past, guiding our responsibility to the future.

This Environmental Sustainability Report for 2025 reflects our continued commitment to preserving not only the sanctity of our sites but also the planet that hosts them. Across more than 150 countries, we are honoured to maintain cemeteries and memorials in landscapes as diverse as the tropics, tundra, and urban centres. Each site presents distinct environmental challenges, but also opportunities to lead by example in sustainable stewardship.

Over the past year, we have deepened our efforts to reduce carbon emissions, enhance biodiversity, and adopt circular practices in horticulture, construction, and operations. From transitioning to electric maintenance fleets to piloting water-efficient irrigation systems, our teams have embraced innovation while remaining true to the Commission's ethos. We have also strengthened partnerships with local communities, governments, and environmental organisations to ensure our work is collaborative and impactful.

Sustainability is not a destination, it is a journey. This report is both a reflection of progress and a roadmap for the future. It demonstrates how remembrance and environmental responsibility can coexist, reinforcing each other in meaningful ways. As custodians of memory, we are also guardians of the earth. The legacy we protect must be one that future generations can inherit with pride.

We invite you to explore this report and join us in shaping a more sustainable tomorrow.
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Claire Horton CBE
Director General
Commonwealth War Graves Commission

CONTENTS

GLOSSARY

CO_2e	Carbon dioxide equivalent – a measurement unit used to express the global warming potential of various greenhouse gases, stated in terms of the global warming potential of one unit of carbon dioxide
CWGC	Commonwealth War Graves Commission
EV	Electric vehicle
FY	Financial year
GHG	Greenhouse gases
HQ	Headquarters
kWh	Kilowatt hour (a unit of energy)
Plan	Environmental Sustainability Plan
PV	Photovoltaic

1. ABOUT THIS REPORT

This report constitutes the fourth in our series of annual Environmental Sustainability Reports, providing regular progress updates on our sustainability transition.

In October 2022, the Commonwealth War Graves Commission (CWGC) published its first annual Environmental Sustainability Report. Within this, we stated our commitment to transitioning to more sustainable ways of working and we introduced the three key drivers shaping our sustainability agenda, which are combatting climate change, protecting biodiversity and promoting a circular economy. We also set out what our objectives for 2025 were within each of these key areas.

In our second annual Environmental Sustainability Report, issued in 2023, we provided an overview of the greenhouse gas (GHG) emissions associated with our activities, together with a breakdown showing the relative contributions that different activities made to these emissions (e.g. fleet vehicles, electricity consumption, business travel). This first inventory of GHG emissions established a necessary baseline against which our future progress in meeting our long-term and near-term reduction targets would be assessed. This baseline data also underpinned the development of an emission reduction strategy designed to help us meet these targets.

In this fourth report, we start by presenting comparative activity data for the last three financial years for the various activities that contribute to our GHG emissions (Section 2). Undertaking this comparison enables us to identify which activities are supporting a decrease in emissions and which other activities are driving up emissions. We then provide an update on how we are progressing against our near-term GHG reduction targets and our wider sustainability objectives, both in terms of our progress to date and our next steps (Section 3). This update is presented under the themes of combatting climate change, protecting biodiversity and promoting a circular economy.

In the main, we have achieved, or are on track to meet, the wide-ranging objectives that we set ourselves for 2025, demonstrating the extent to which our teams around the world are working to support our sustainability agenda. Our institutional knowledge is steadily developing as we trial and adopt new ways of working, alternative products and new technologies, that have been introduced to help reduce the environmental impact of our activities.

The integration of environmental sustainability into our processes, plans and objectives continues to evolve. The buy-in for change has been promoted by regular internal communications on sustainability initiatives, training, raised expectations and changing norms.

There is, however, an emergent, unforeseen issue relating to our phase out of biocides, which will cause a partial reversal in our progress on this endeavour, whilst we work to develop potential solutions. Further information on this is provided in Section 3.

Whilst we have made significant strides, there is work to be done to ensure that our sustainability transition is sufficiently embedded throughout the organisation, standing firm alongside other strategic priorities.

2. ENVIRONMENTAL PERFORMANCE AT A GLANCE

ACTIVITY DATA

CWGC's environmental performance at a glance - Activity data

	FY 22/23	FY 23/24	FY 24/25	Trend FY 24/25 vs FY 23/24
Energy consumption				
Electricity consumption (kWh) (incl. off-site charging of electric vehicles & machinery)	2279439	1921535	1945104	●
Natural gas consumption (kWh)	338374	367364	404248	▲
Fuel oil consumption (litres)	9302	10681	8018	▼
Diesel consumption by fleet vehicles (litres)	585548	542838	568354	▲
Petrol consumption by fleet vehicles (litres)	33825	33850	35683	▲
Diesel consumption by machinery/on-site vehicles (litres)	55062	62458	52787	▼
Petrol consumption by machinery/on-site vehicles (litres)	139931	144765	144401	●
Fleet vehicles				
Distance driven (km)	5998133	5624360	6043438	▲
Number of electric vehicles	3	3	11	▲
% distance travelled by electric vehicles	0.27	0.54	1.62	▲
Average CO_2 emission figures for all cars in fleet (g/km)	154	153	139	▼
Average CO_2 emission figures for all light commercial vehicles in fleet (g/km)	219	220	228	▲
Average CO_2 emission figures for all heavy goods vehicles in fleet (g/km)	636	592	661	▲
Energy efficiency				
Energy-efficiency audits undertaken (per year)	9	46	46	●
Renewables & low carbon energy				
Renewable energy installations providing non-electrical energy (e.g. solar thermal) (total)	3	5	5	●
Renewable energy installations providing electrical energy (e.g. PV) (total)	2	15	16	▲
Low carbon heating/cooling installations (e.g. air source heat pump) (total)	1	2	2	●
Renewable energy feasibility studies undertaken (per year)	8	36	32	▼
% of electricity consumption that was sourced from renewable energy generation (via mains supply)	-	25	47	▲
Carbon sequestration				
Sites reviewed to identify tree planting potential (per year)	66	76	67	▼
Additional trees planted (per year)	1860	298	297	●
Biodiversity				
Number of individual biodiversity enhancements made (per year)	-	632	228	▼
Water consumption				
Volume of water consumed (m^3)	786073	686998	621249	▼
Water-efficiency audits undertaken (per year)	-	17	44	▲
Number of rainwater storage features (total)	14	14	22	▲
Total capacity of rainwater storage features in place (m^3)	308	241	500	▲
Business travel distances				
Flights (km)	2838099	3176722	2998261	▼
Rail (km)	225020	277313	286080	▲
Bus (km)	3925	16573	31882	▲
Taxi (km)	57779	70144	82320	▲
Ferry (km)	7141	9642	23906	▲
Personal cars used on company business (km)	200484	199545	208488	▲
Waste				
Total quantity of waste generated (tonnes)	8613	10808	10783	●
Number of sites that compost green waste on-site or at another CWGC site	796	795	796	●
Number of sites that send green waste for composting by a third party	908	873	884	▲
Number of sites that send green waste to landfill	152	125	114	▼

Key

▼ ▲ Favourable trend
▼ ▲ Acceptable/neutral trend
▼ ▲ Unfavourable trend

GREENHOUSE GAS EMISSIONS[1]

CWGC's environmental performance at a glance - Greenhouse gas emissions

		FY 22/23	FY 23/24	FY 24/25	Trend FY 24/25 vs FY 23/24
	Greenhouse gas (GHG) emissions by scope				
	Scope 1 GHG emissions (tCO_2e)	2371	2222	2260	▲
	Scope 2 GHG emissions (tCO_2e)	441	297	214	▼
	Scope 3 GHG emissions (partial) (tCO_2e)	3140	3158	2955	▼
	Breakdown of GHG emissions - Scopes 1 & 2				
	Fuel consumed by all fleet vehicles (tCO_2e)	1571	1435	1503	▲
1	Electricity consumption (tCO_2e) (emissions associated with non-renewable electricity)	441	297	214	▼
2	Composting on CWGC sites (tCO_2e)	188	196	204	▲
	Fuel consumed by machinery & on-site vehicles (tCO_2e)	450	474	445	▼
	Energy consumed to heat/cool buildings or power processes (excl. electricity) (tCO_2e)	92	108	99	▼
	Refrigerant leakage from air-conditioning units (tCO_2e)	71	10	9	▼
	Breakdown of GHG emissions - Scope 3				
	Commuting (tCO_2e)	1153	1153	1153	●
3	Fuel- & energy-related activities (not incl. in Scopes 1 & 2) (tCO_2e)	775	713	691	▼
	Business travel - flights, rail, bus, taxi, ferry, personal cars, short-term hire vehicles (tCO_2e)	771	896	860	▼
	Off-site waste management & wastewater treatment (tCO_2e)	359	326	204	▼
	Water supply (tCO_2e)	81	69	47	▼
	Breakdown of GHG emissions - Scopes 1, 2 & 3				
	Fuel consumed by all fleet vehicles (tCO_2e)	1571	1435	1503	▲
	Commuting (tCO_2e)	1153	1153	1153	●
1	Fuel- & energy-related activities (not incl. in Scopes 1 & 2) (tCO_2e)	775	713	691	▼
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	Water supply (tCO_2e)	81	69	47	▼
	Refrigerant leakage from air-conditioning units (tCO_2e)	71	10	9	▼
	Breakdown of GHG emissions from business travel				
	Flights (tCO_2e)	626	774	739	▼
	Short-term hire vehicles (tCO_2e)	96	67	62	▼
	Personal cars used on company business (tCO_2e)	29	30	31	▲
	Taxi (tCO_2e)	12	15	17	▲
	Rail (tCO_2e)	6.5	7.5	6.9	▼
	Ferry (tCO_2e)	0.8	1.1	2.1	▲
	Bus (tCO_2e)	0.4	1.6	2.0	▲

Key

▼ ▲ Favourable trend
▼ ▲ Acceptable/neutral trend
▼ ▲ Unfavourable trend

[1]Based on a recent literature review, the emission factor applied to quantities of green waste composted on CWGC sites has been updated. This has resulted in changes to the associated scope 1 emissions associated with this activity for the three years reported in the table above. This recalibration ensures our reporting aligns with current scientific guidance.

3. TRANSITIONING TO MORE SUSTAINABLE WAYS OF WORKING

In our first annual Environmental Sustainability Report in 2022, we stated our commitment to transitioning to more sustainable ways of working and we set out what our sustainability objectives were for 2025. In this section, we provide an update on the progress achieved towards our stated objectives and our next steps, taking the opportunity to highlight key achievements and the great diversity of sustainability initiatives that are taking place. The update is presented under the headings of combatting climate change, protecting biodiversity and promoting a circular economy.

COMBATTING CLIMATE CHANGE

Combatting climate change - key achievements by end of FY 24/25

Renewable electricity	Renewable energy self-generation	Emissions reductions Scope 1 & 2	Energy-efficiency audits	Electric vehicles	Carbon sequestration
+ 47%	+ 21	- 12%	x 101	x 11	x 2455
Progressively switching to renewable electricity, which now comprises 47% of supply	16 PV systems installed	Scope 1 & 2 emissions steadily reducing	Energy-efficiency audit programme established for offices & base sites	Steadily increasing the number of electric vehicles in our fleet, where feasible	209 site reviews undertaken to identify tree planting opportunities
Timetable in place for transitioning to 100% renewable electricity by FY 30/31	5 solar thermal systems installed	Rate of reduction needs to increase to align with our near-term reduction target	101 energy-efficiency audits undertaken over last 3 years, covering 37% of all base sites	% distance travelled by electric vehicles is low but rising	2455 additional trees planted over 3 years

REDUCING GHG EMISSIONS

Establishing emission inventories & setting reduction targets

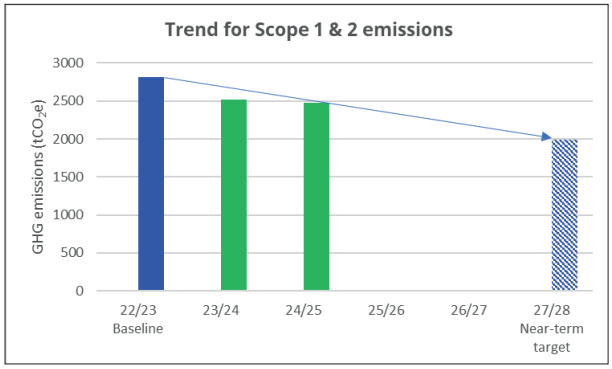
Objective: By 2025, we aim to have established systems in place for calculating annual GHG emissions associated with our direct activities and those of our wider value chain. A near-term emission reduction target (for scope 1 and 2 emissions and for selected categories of scope 3 emissions) will have been set and a decarbonisation pathway will have been developed to help us achieve this target.

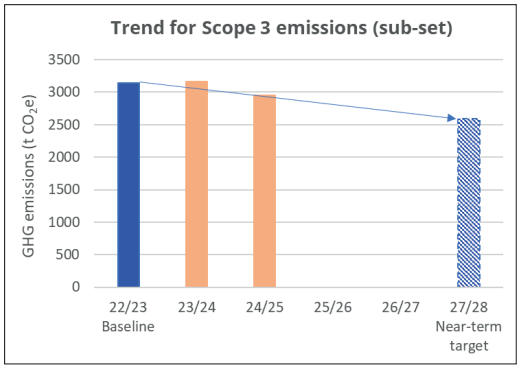
Progress to date:

1. We have committed to a net-zero GHG emission target by 2050 and are committed to reducing our GHG emissions in line with climate science, as part of the global effort to prevent the most dangerous consequences of climate change by limiting global warming to 1.5°C.
2. We have set two near-term science-based reduction targets[2] - the first is for our combined scope 1 and 2 emissions, and the other is for the sub-set of scope 3 emissions that are calculated from activity data (as opposed to being based on spending data).[3,4]
3. In early 2024, we formulated a decarbonisation plan to deliver emission reductions at the pace required to meet our near-term reduction targets.
4. For our scope 1 and 2 emissions, we achieved a cumulative, combined decrease of 12% in FY 2024/25 (against our FY 2022/23 baseline), which is in line with meeting our near-term reduction target (of 29.4%) in FY 2027/28. The main single contributing factor has been the switch to renewable electricity tariffs - this has been partially countered by an increase in emissions from fleet vehicles due to a 7.5% increase in distances driven.
5. For the sub-set of scope 3 emissions that are covered by our scope 3 reduction target, we achieved a cumulative decrease of 5.9% in FY 24/25 (against our FY 2022/23 baseline), which is not quite in line with meeting our near-term reduction target (of 17.5%) in FY 27/28. However, there has been an encouraging reduction in distances flown in FY 24/25, together with continued reductions in emissions associated with water consumption and off-site waste management.
6. We have now quantified the previously unquantified scope 3 emission categories and have established which categories are relatively minor or not applicable to the Commission's operations.[5]

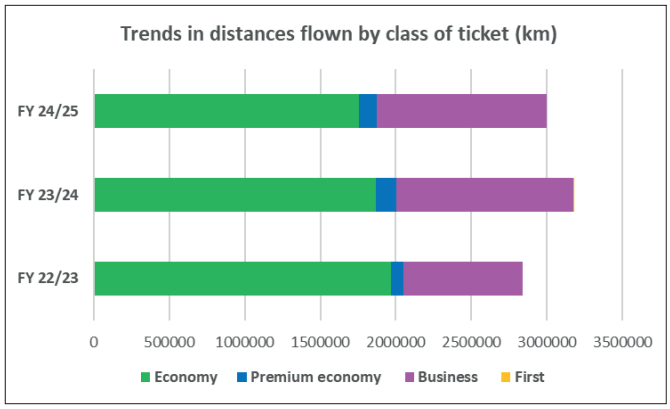
What's next? In FY 2025/26, we will:

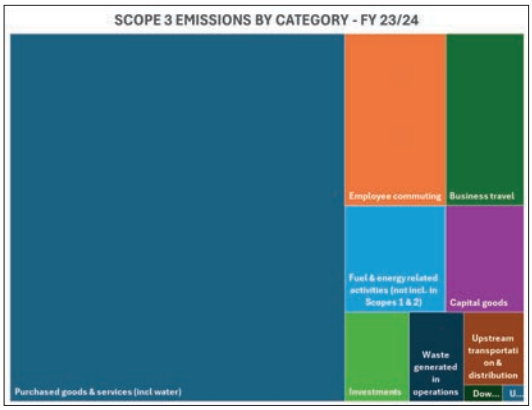
1. Review and update our decarbonisation plan to ensure that our programme of planned actions remain viable and sufficient to deliver the emission reductions required.





[2]In line with guidance issued by the Science Based Targets Initiative.
[3]Sub-set of scope 3 emissions covered by our scope 3 emissions target includes: category 3 (Fuel- and energy-related activities (not included in scope 1 or scope 2)); category 5 (Waste generated in operations); category 6 (Business travel); category 7 (Employee commuting) & water consumption.
[4]For an explanation of scope 1, 2 & 3 GHG emissions, please refer to Section 2 of the 2023 Environmental Sustainability Report.
[5]Scope 3 emission categories considered to be relatively minor or not applicable to the Commission's operations in FY 24/25: category 9 (Downstream transportation & distribution); category 10 (Processing of sold products); category 11 (Use of sold products); category 12 (End-of-life treatment of sold products); category 14 (Franchises).





Air travel *is a focus of attention (left). After a 11.9% increase in the distance flown in FY 23/24, there has been an encouraging 5.6% decrease in FY 24/25. Travel budgets have been capped & stricter criteria on booking business class flights have been introduced.*[6] *Distances travelled by train & bus have increased steadily since FY 22/23, which is a welcome trend as these modes of public transport are associated with lower emissions than that of personal cars, taxis & flights.*

Quantifying scope 3 emissions *(right): The top 3 categories contributing to our* **scope 3 emissions** *are purchased goods & services, employee commuting & business travel.*

Decarbonising our operations

Objective: By 2025, we aim to source at least 25% of purchased electricity from renewable electricity supplies and will have generated a timetable for transitioning to 100% renewable electricity by 2031 (where available in country). Through using electric vehicle (EV) pool cars and trialling small electric vans, we will have built-up experience and knowledge to help inform the 2024/25 feasibility study relating to our future wider transition to EVs and other ultra-low emission vehicles. By 2025, our transition towards the use of electrically powered machinery will be progressing steadily and the findings from the energy-efficiency audits undertaken at base sites and offices will be feeding into the programme of energy-saving measures being undertaken.

Progress to date:

1. We now source 47% of purchased electricity from renewable electricity supplies and have developed a timetable for transitioning to 100% renewable electricity by 2031 (where available in country).
2. We have installed 21 renewable energy systems (16 photovoltaic systems providing renewable electricity and 5 solar thermal systems providing hot water). We have set-up our first virtual renewable electricity network amongst our 5 PV systems in Tunisia, which supports our self-sufficiency in electricity in this country.
3. We have steadily expanded the number of electric vehicles in our fleet to 10 cars and one van, together with additional on-site charging points. The % distance travelled by electric vehicles is low but rising. The electric van has been driven by one of our UK Regional Operations Coordinators to help assess the viability of using this type of vehicle for this type of role. We have also trialled small electric vans in France and Belgium and have introduced an EV salary sacrifice scheme within the UK to promote EV uptake amongst employees.
4. We have reviewed and updated our feasibility study relating to our future wider transition to EVs and other ultra-low emission vehicles.
5. We have introduced an asset management system that enables us to generate annual statistics on the percentage of operational machinery in use that is electrically powered. We are steadily switching over to electrical machinery, where viable and where funds allow. For example, the proportion of hand-held horticultural equipment that is now electrical has increased from 23% in FY 2021/22 to 41% in FY 2024/25. We are currently trialling new models of electrically powered machinery, including a knapsack leaf blower, short and long-handled hedge trimmers, a rotary mower and an autonomous mower. We are also trialling a portable battery re-charger unit.
6. We have undertaken 101 energy-efficiency audits, covering 37% of our base sites, which are highlighting potential energy-saving measures.

[6]From a sustainability perspective, business class flights are to be avoided where possible due to the higher GHG emissions attributed to this class of travel.



Expanding our electric fleet *(left & centre) with 7 more electric cars in France & (right) our first electric van in the UK.*



Expanding our charging capacity *(left & centre) with two new dual EV charging units at our offices in Ieper (Belgium), each with a capacity of 20 kWh, & (right) a fast 30 kWh EV charging unit at our office in Beaurains (France).*

Expanding our renewable energy generation capacity *with a new photovoltaic system at Chittagong War Cemetery (Bangladesh).*

What's next? In FY 2025/26, we will:

1. Continue to consider options for transitioning to renewable electricity supplies when energy contracts come up for renewal.
2. Strive to maximise the usage of our electric vehicles (e.g. by prioritising the use of the electric pool cars in preference to the fossil-fuel powered pool cars).
3. Trial new electrically powered machinery, such as a battery-operated edge cutter.
4. Review the viability of using hydrotreated vegetable oil (HVO) as a fuel replacement within machinery and fleet vehicles.
5. Continue to audit our base sites and offices to identify potential energy-efficiency opportunities and increase the focus on delivering energy-saving measures.





Trialling a suite of electrical machinery *at Brookwood Military Cemetery (UK) (left to right): a robotic mower, a leaf blower, a hedge trimmer, a rotary mower & a portable power bank charger.*

PROMOTING CARBON SEQUESTRATION

Objective: By 2025, we will know how many specimen trees there are on our estate following the completion of the 3-year cycle of our new tree risk management process. We will also have started to collate data on tree groups and woodland areas. In addition to taking all reasonable measures to protect and nurture our existing trees, we will have reviewed 150 sites to identify where missing trees can be replaced or additional trees can be planted.

Progress to date:

1. We have now succeeded in recording the number of individual specimen trees and areas of woodland at over 95% of our sites. This baseline will be used to track changes in the carbon sequestration value of our estate over the years ahead.
2. We have reviewed 209 sites to identify where missing trees can be replaced or additional trees can be planted, with due reference to the original design and the heritage significance of each site. We have an emergent tree planting and establishment programme and have established 2455 new trees over the last 3 years, as guided by the site reviews undertaken. As well as promoting carbon sequestration, these additional trees will provide other ecosystem benefits such as enhancing biodiversity and providing extra shade.
3. We have delivered tree design workshops for our global horticultural teams to support (a) the management of our existing trees, (b) the evaluation of sites to identify further tree planting opportunities, and (c) the selection of appropriate trees and their establishment.
4. A Tree Steward Certificate training course has been developed to further support our vision of establishing 39,000 trees by 2039 across our global cemeteries, memorials and surrounding landscapes (as part of our '39 for 39 – Planting for the future' project). The training course will support those who will be designing, planting and providing aftercare to the many trees being planted. Our aim is to establish new trees in each of the 52 countries with constructed sites.
5. We commissioned an independent study into the feasibility of neutralising our projected residual GHG emissions in 2050 with an increase in our estate's carbon sequestration potential, as could potentially be delivered through significant tree planting projects.

What's next? In FY 2025/26, we will:

1. Review further sites to identify tree planting opportunities and expand our tree planting and establishment programme. We aim to establish approximately 2000 trees in FY 25/26.
2. Commence the Tree Steward Certificate training course.

Newly planted trees at *(Top to bottom, left to right) Anzio War Cemetery (Italy), Nairobi War Cemetery (Kenya), Rome War Cemetery (Italy), Freetown (King Tom) Cemetery (Sierra Leone) & Tank Cemetery (France)*

ADAPTING TO CLIMATE CHANGE

Objective: By 2025, we will better understand the current and future potential impacts of climate change on our sites. The requirement for project design to consider risks presented by changing climatic conditions will be embedded within the organisation. By 2025, we will have collated 5 years of data on extreme weather events impacting on our sites and we will have systems in place for logging observed changes in weather patterns. We will have identified which sites are vulnerable to flooding and we will be working to address this risk.

Progress to date:

1. We have recently introduced the use of a climate diagnostics model that enables us to predict the impact of climate change on all our sites, under different climate change scenarios and timeframes. For example, the model highlights which sites are likely to experience greater risks of drought, wildfire, heat stress, high rainfall, flooding and coastal erosion. Using this model, along with local knowledge, the risks from climate change can be taken fully into consideration in the prioritisation and design of new projects and in reviewing how we might make our sites and operations more resilient to the predicted changes.
2. We now require the design of new horticultural and structural projects to take into consideration the risks presented by changing climatic conditions (e.g. whether proposed tree species are suitable given the projected changes in climate for the area).
3. We continue to record extreme weather events, using our incident recording system, and changing climatic conditions impacting on our sites (e.g. repeat flooding events, high winds, unusual drought conditions). In FY 2024/25, the most significant event was a wildfire in the Gallipoli Peninsula, Türkiye, in August 2024, where a fire quickly grew due to strong winds and severely damaged our Anzac base site and a number of cemeteries.

(Left to right, top to bottom) **Storm damage** *at Madras War Cemetery (India), Roeux British Cemetery (France) & Sai Wan War Cemetery (Hong Kong),* **Wildfire damage** *at Canterbury Cemetery (Türkiye), NZ No.2 Outpost Cemetery (Türkiye) & Catania War Cemetery (Italy),* **Flooding** *at Grevillers British Cemetery (France), Kirkee War Cemetery (India) & Imphal Indian Army Cemetery (India)*

What's next? In FY 2025/26, we will:

1. Further embed the use of our new climate diagnostics model to help us better understand the current and future potential impacts of climate change on our sites.
2. Work towards providing more relief from rising temperatures through the shade and cooling effect of the additional 2000 trees to be established across our sites.

PROTECTING BIODIVERSITY

Protecting biodiversity - key achievements by end of FY 24/25

Variable grass management zones	Bird nesting & bat boxes	Bee/insect hotels	Wildflower zones & bulb/nectar rich lawns	Deadwood piles/hedges/ pyramids	Reducing usage of pesticides, herbicides & biocides
+ 121868 m^2	x 432	x 171	+ 146007 m^2	x 94	- 98.6%
Grass allowed to grow longer in carefully selected zones at 130 sites	Installation of 432 bird nesting boxes & 38 bat boxes	Installation of 171 bee/insect hotels, aiming to provide a suitable egg-laying environment	Introduction of wildflower zones & bulb/nectar rich lawns at 147 sites	Introduction of 94 deadwood features in the form of piles, hedges & log pyramids	Continuing to progressively reduce usage of herbicides, pesticides & biocides
Amounting to 121868 m^2 under variable grass management	At certain sites, aiming to atract specific bird species to assist with the control of less desirable species	Trialling the efficacy of various types, many designed & crafted in-house	Amounting to 146007 m^2 of biodiversity enhancements	Providing a place for nesting & hibernation, & providing a food supply for a variety of wildlife	Achieved a 98.6% reduction (by volume) in the use of these chemicals in FY 24/25 against a 2019 baseline

ACTIVELY ENHANCING BIODIVERSITY

Objective: By 2025, we will have gained valuable experience on how best to enhance biodiversity on our sites; both through a well-embedded concept of biodiversity net gain for projects (whereby we take the opportunity whilst undertaking projects on sites to improve their biodiversity potential) and through the implementation of further biodiversity-enhancing measures at over 100 sites. By 2025, working to improve biodiversity will be an accepted part of our responsibilities.

Progress to date:

1. We have generated guidance and criteria for the active enhancement of biodiversity on our estate.
2. The drive to enhance the biodiversity potential of our estate has been embraced by many of our staff and our progress has exceeded expectations, with 974 individual biodiversity enhancements being recorded by the end of FY 2024/25 (as illustrated in the key achievements diagram and photos in this section). Improved record keeping of these enhancements is enabling us to track progress with greater confidence.
3. Working to improve biodiversity is now an accepted part of our responsibilities.
4. We have encouraged volunteers and employees to record their biodiversity observations, using a selected app. Recorded observations can help us to select the most appropriate biodiversity enhancements and to monitor the spread of invasive plants and pests.

What's next? In FY 2025/26, we will:

1. Continue to introduce further biodiversity-enhancing measures across our sites.

Creating a living roof: *The roof of the UNESCO listed Menin Gate in Ieper (Belgium) has been transformed into a living roof, carefully planted with a blend of sedum & herbaceous species. This layer of vegetation will support local biodiversity & it will extend the lifespan of the underlying waterproofing system, by shielding it from UV exposure & temperature extremes. The living roof also enhances the visual character of the memorial & acts as a natural buffer for rainwater, absorbing & slowing run-off, contributing to improved stormwater management.*

The living roof offers a quiet, natural counterpoint to the solemn grandeur of the Menin Gate, which bears the names of more than 54,000 missing Commonwealth soldiers who died in the First World War. It is both a tribute to life & a symbol of renewal—rooted in history, yet growing towards the future.



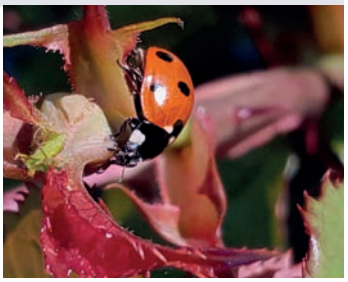

Putting dead wood to good use *at (left to right, top to bottom) Quarry Cemetery, Marquion (France), Bayeux Memorial (France), Yokohama War Cemetery (Japan) & Anzio War Cemetery (Italy)*

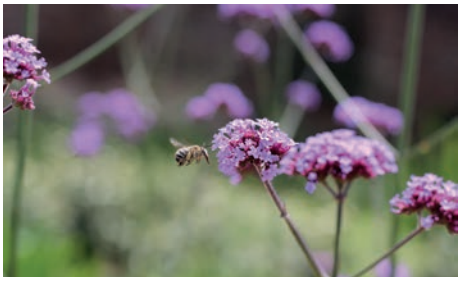





Making space for wildlife *across our sites*



Variable grass management *at (left to right, top to bottom) Quarry Cemetery, Marquion (France), Quarry Cemetery, Montauban (France), Ambon War Cemetery (Indonesia), Bedford House Cemetery (Belgium), St. Julien Dressing Station Cemetery (Belgium) & Tyne Cot Cemetery (Belgium)*

Bird nesting boxes *at (left to right) Les Baraques Military Cemetery (France), Ecoivres Military Cemetery (France), Ploegsteert Wood Military Cemetery (Belgium) & Chittagong War Cemetery (Bangladesh)*

Blooming marvellous: *(left to right, top to bottom)* **transplanting native epiphytic orchids** *in the trees at Kranji War Cemetery (Singapore),* **wildflowers** *at Anzio War Cemetery (Italy), Etaples Military Cemetery (France) x 2 & Milan War Cemetery (Italy)*

Insect hotels in Belgium: *(left to right) Bedford House Cemetery, Ploegsteert Wood Military Cemetery, Rifle House Cemetery, St. Julien Dressing Station Cemetery & Brussels Town Cemetery*

REDUCING IMPACTS ON BIODIVERSITY

Objective: By 2025, our usage of pesticides, herbicides and biocides will have been effectively reduced to minimal levels, as driven by a move to more Integrated Pest and Weed Management approaches and legislative changes across Europe.

Progress to date:

1. We have continued to progressively reduce our usage of herbicides, pesticides and biocides. In FY 2024/25, we achieved a 98.6% reduction (by volume) in the use of these chemicals, against a 2019 baseline.
2. We have provided further training on our headstone cleanliness policy to support the phase-out of biocides and to emphasise our "clean on the basis of need" approach. As part of this, we have issued new guidance on cleanliness standards for the various structural features in our cemeteries (e.g. walls, shelter buildings and entrance buildings).
3. As a replacement to biocides, we began introducing an enzyme-based, headstone cleaning product in Belgium and the Netherlands in 2019. This product is now in use at all locations where we previously used biocides (predominantly northern Europe). It is also in use in northern Italy, Malta and Singapore. We had, until recently, ceased ordering biocides for stone cleaning and were depleting any remaining stocks of such chemicals. It is now apparent that a dark staining, caused by a resistant microbial film, is affecting headstones at around 100 of our sites in France and Belgium. Whilst we work alongside scientific experts to develop an effective solution to this emergent issue, we are reluctantly reverting to the use of biocides as an interim measure in selected locations, in order to maintain desired standards and meet stakeholder expectations.
4. We continue to actively explore and test new headstone treatment options. In early 2024, we conducted trials on a yeast-based stone-cleaning product in France, alongside some laboratory testing. Although this product did not prove successful for use at scale, it may prove suitable for more limited applications. Other treatment options now being assessed include the application of a sol-gel coating.
5. We are steadily gaining experience in harnessing non-chemical approaches to control pests and weeds, maintaining high standards of care whilst being environmentally more responsible.

What's next? In FY 2024/25, we will:

1. Further embed our "clean on the basis of need" approach.
2. Continue to conduct trials on further alternative stone cleaning products that have reduced environmental impact.

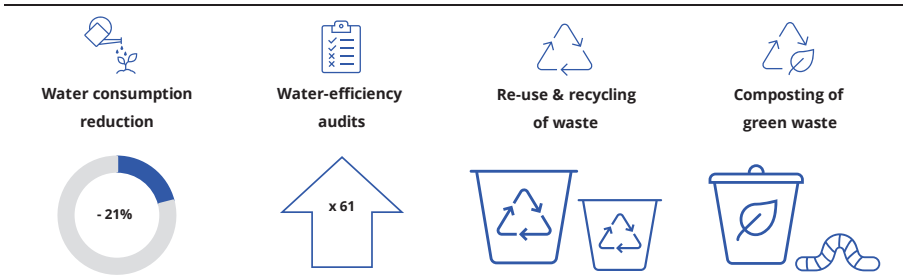


Protected frog *(left): During preparations for a periodic clean-out of the water feature at Mazargues War Cemetery (France), a protected species of frog was discovered. The scheduled cleaning was therefore postponed.*

Red wood ants *(centre & right): During preparations for a renovation project at Bergen-op-Zoom War Cemetery (Netherlands), a red wood ant hill was discovered at a proposed planting site for shrubberies & trees. Having previously been on the national red list for protected species, we were keen to protect the anthill & its inhabitants. Firstly, the position & size of the new trees to be planted was amended to minimise shading of the anthill. These structures need sunlight to remain viable & the ants need the sunlight to optimise their metabolism. Secondly, we promoted the food resources available to the red wood ants. These ants have a close association with aphids, which provide them with honeydew, & aphids are attracted to the Tilia cordata (small-leaved linden) tree. We therefore selected a small cultivar of this tree species. Lastly, an open 'ecological' zone was created around the anthill, providing the red wood ants with a safe, protected habitat.*

PROMOTING A CIRCULAR ECONOMY

Promoting a circular economy - key achievements by end of FY 24/25



21% reduction in water consumption achieved between FY 22/23 & FY 24/25	Water-efficiency audit programme established for offices & base sites	Arrangements for the segregation, re-use & recycling of waste continue to improve	On-site composting capability improved at a number of sites
Reduction mainly driven by water-efficiency targets tailored to each irrigation system	61 water-efficiency audits undertaken over last 3 years	Proportion of waste that is being landfilled has decreased	Vermi-composting process extended to further sites & mobile composting unit trialled successfully

REDUCING RESOURCE CONSUMPTION

Objective: By 2025, we will be working to adhere to water-efficiency targets tailored to each irrigation system. In addition to annually monitoring water consumption, we will be 2 years into our 5-year programme of water-efficiency audits for base sites that will have informed measures to save on water consumption. In addition to water, we will be reporting on the consumption of other key resources and will be engaging with our supply chain to promote improvements aligned with the principles of a circular economy. We will have derived and introduced procurement criteria for products and services that are aligned with our sustainability principles.

Progress to date:

1. We have developed and have been working towards water-efficiency targets tailored to each irrigation system since FY 23/24. These targets have been instrumental in helping us to reduce water consumption by 21% since FY 22/23.
2. We continue to roll out a smart, software system that enables us to better optimise and monitor the water consumed by our irrigation systems. By the end of FY 2024/25, this system had been installed at 44 sites (up from 26 in FY 2023/24) in Greece, Israel, Egypt, Italy and Tunisia.
3. We have undertaken a successful technological pilot programme in Italy to monitor soil moisture, salinity and temperature, in order to help inform the need for irrigation. These environmental sensors are now part of the baseline specification for any new or replacement irrigation systems.
4. We have categorised all irrigated sites in terms of the potential that exists for reducing or removing irrigation requirements through landscape changes. 12 sites have been selected as potential pioneer sites, where we will explore the extent to which water consumption can be reduced whilst still meeting internal and external stakeholder expectations for standards of care.
5. We have developed an in-house training course for those that manage or operate irrigation systems, to improve levels of understanding and competence.
6. We are 2 years into a programme of water-efficiency audits for our buildings. We are also 2 years into our 5-year cycle of irrigation system surveys, assessing the condition of our systems, with 30 surveys undertaken to date.
7. We have increased the number of rainwater harvesting systems, most recently at Brookwood Military Cemetery (UK) and Yokohama War Cemetery (Japan), and we have introduced a grey-water recycling system at Rome War Cemetery (Italy), wherein wastewater sourced from the municipality is filtered and reused for irrigation, reducing our use of freshwater.
8. We have introduced a set of Sustainable Procurement Guidelines, aligned with our sustainability principles. These guidelines pertain to the avoidance of peat or peat-containing products, and the promotion of paper and paper-based products with a high recycled content; timber and timber products from sustainable sources; plants delivered in reusable, recyclable or biodegradable containers; and wreaths made from natural, compostable materials.

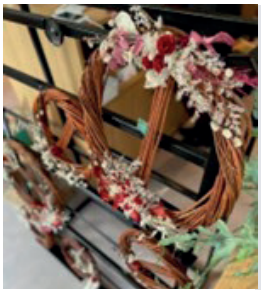
Grey-water recycling *at Rome War Cemetery (Italy): wastewater sourced from the municipality is filtered & reused for irrigation, reducing our use of freshwater. This system is linked to a new smart irrigation system that makes use of local weather data & soil humidity sensors to help us optimise water usage.*

What's next? In FY 2025/26, we will:

1. Start our 10-year programme of irrigation system replacements, commencing in Tunisia and Italy. This replacement program will deliver water-efficiencies through (a) improving the alignment between water application rates and soil infiltration rates, thus lowering losses from evaporation, and (b) reducing the site areas that are irrigated and enabling the irrigation of certain site sections to be paused, if required. Energy-efficiencies will also be delivered by reducing the volume of water that needs to be pumped and by using variable speed pumps, for example.
2. Install further smart, software systems to enable us to better optimise the water consumed by our existing irrigation systems, together with further soil condition monitors.
3. Design and execute the first major pioneer site in Tunisia, with the aim of obtaining labour efficiencies and a more climate resilient layout, focusing on water-efficiencies and increased tree coverage.
4. Expand the water-efficiency audit programme across further offices and base sites.

Sustainable procurement: *We have planted more than 25,000 daffodils in our cemeteries in Belgium. The bulbs were grown without chemicals at a nursery in the Netherlands, reflecting our commitment to sustainable horticulture.*

Growing our own: *(left to right)* **nursery bed** *at Anzio War Cemetery (Italy),* **watering cuttings** *at Freetown (King Tom) Cemetery (Sierra Leone) &* **propagating plants** *at Delhi War Cemetery (India).* **Potting up plants** *(far right) during a volunteer day at Brookwood Military Cemetery (UK) – demonstrating great circularity, the potting team used self-made compost, harvested rainwater & used waste plastic pots from previous plant deliveries, to pot up plant material from existing plants that needed dividing or reducing – carried out on a fit-for-purpose makeshift potting bench made from re-purposed pallets & board. Of the 500 potted plants produced to date, 100 have already been replanted back into the beds at Brookwood Military Cemetery, reducing the need to purchase plants from elsewhere.*



And making our own: *(left to right)* **willow wreaths** *being decorated by one of our creative volunteers at a wreath-making workshop & finished* **wreaths for sale** *at our new visitor centre in Ieper (Belgium)*

REDUCING WASTE GENERATION

Objective: By 2025, effective engagement with key suppliers and partners will have yielded reductions in waste generation at our sites via initiatives that design out wastage and promote repair, re-use and recycling. We will have set and be working towards targets for reducing waste quantities going to landfill. Internal collaboration between regions will enable best practice examples of a circular economy approach to be more widely adopted.

Progress to date:

1. We have collated data on waste arisings from across our estate since FY 2022/23, deriving information on how much waste our global estate generates and how this waste is managed.
2. We have improved arrangements for the segregation, re-use and recycling of waste at offices and base sites. There has also been a heightened awareness of the need to consider how waste from structural and horticultural projects and day-to-day activities can be avoided, re-used or recycled. For example, in France, the early-stage plants we will need this year are being cultivated at a nursery in biodegradable pots, as opposed to plastic pots.
3. The proportion of waste that was composted, re-used or recycled continued to rise in FY 2024/25.
4. 4 out of our 5 operational areas report that there is no landfilling of green waste. The remaining operational area, covering Africa and the Indian sub-continent, is continuing with efforts to divert green waste from landfill. 15% of those sites that were reported as landfilling green waste in this region in FY 22/23, have now diverted this biodegradable waste away from landfill.
5. We have improved our on-site composting capability at a number of sites; for example, in India, we have introduced the vermi-composting process at further locations. In the UK, we have successfully trialled a mobile composting unit for use at certain locations where our plots are located within larger cemeteries and churchyards, owned by other organisations. These units now form part of routine operations at 3 sites in the UK.

What's next? In FY 2025/26, we will:

1. Continue to improve our on-site composting capability at further sites.
2. Continue to promote examples of internal projects where the reduction, re-use or recycling of waste has represented best practice.



Reducing plastic waste *by ordering early-stage plants grown within a biodegradable mesh, as opposed to plastic pots. In France, we have made a special arrangement with a nursery to cultivate all the young plants we will need this year with peat-free substrate in a biodegradable mesh, which does not require removal before planting. As a result, we will avoid the generation of more than 27,000 waste plastic pots. The trays in which the pots are delivered are returned to the supplier. As a further plus, these trays can now be wooden as opposed to plastic.*



Vermicomposting green waste *at (left to right) Kirkee War Cemetery (India), Bedford House Cemetery (Belgium) & obtaining the* **finished vermicompost** *at Gauhati War Cemetery (India)*

Innovative mobile composting units *at Hastings Cemetery (UK) – After a successful trial of an innovative mobile composting unit, developed by a member of our UK team, these units now form part of routine operations at an initial 3 sites. The finished product from the units has been used as a soil conditioner on headstone borders, on the same plots from where the green waste was generated, helping to improve the conditions for plants to thrive.*

The new **Memorial to the Missing** *at Brookwood Military Cemetery (UK) will be set within an area populated by pollinator-friendly plants & 600 trees. Waste from the quarried Portland stone being used will be minimised by using the normally wasted off-cuts as seating. Stone from the previous memorial is being donated to local craft colleges.*

4. MANAGING OUR SUSTAINABILITY TRANSITION

GOVERNANCE

The success of our sustainability transition continues to depend on the on-going efforts of many across our organisation, who are delivering the improvements needed, sharing their experiential knowledge and reporting the information required so that we can track our collective progress. To help ensure the focus on sustainability is secured across the various geographical areas and work functions, key elements of the Environmental Sustainability Plan are now incorporated as objectives within our organisation-wide strategy, issued in 2023.

There are 2 central components to the governance of our sustainability transition:

1. **Sustainability Transition Project Board** – This Project Board (comprised of the Head of Environmental Sustainability, the Chief Operating Officer, the Director of Estates, the Director of Horticulture, the Director of Finance and Corporate Services, Marketing and Communications Director and Internal Communications Manager) met approximately every quarter in FY 24/25. It provides oversight of the implementation of the Environmental Sustainability Plan and associated sustainability initiatives. The Project Board's main function is to identify and act to resolve any difficulties or constraints identified, thereby helping to drive the pace at which progress is achieved. Given the members of the Project Board, it also serves as an effective way of (a) feeding in sustainability-related questions, viewpoints and requests from across the organisation, and (b) generating ideas for internal and external communications that will support and explain our sustainability transition.

2. **Executive Leadership Team and Commissioners** – Given the strategic significance of the sustainability agenda for CWGC, significant updates relating to the implementation of the Environmental Sustainability Plan are presented to the Executive Leadership Team and our Commissioners, as required.

EMPLOYEE ENGAGEMENT

Our sustainability transition is permeating effectively through the organisation and has progressed to a business-as-usual status. Progress updates to management across all geographical areas regularly take place, as required.

Internal updates on sustainability initiatives are also distributed more widely via a quarterly Green Fingers newsletter, which captures examples of how our employees around the world are embracing and delivering against our sustainability agenda. The aim of these digital newsletters is to celebrate our achievements and to inform and inspire us all to act as agents of change.

On air: *Elise Harrington & Stuart Simpson hosting the first episode of their UK Green Team podcast, in which Claire Horton (Director General of the CWGC) was their special guest.*

COMMUNICATION

We have begun installing two types of signs at some of our cemeteries to inform visitors on the steps being taken to make our operations more environmentally sustainable. One type of board is pre-printed and provides an overview of our main sustainability objectives; the other type shows hand-written messages from local gardening teams, highlighting changes that may be observed on individual sites.



Sustainability signage: *(left to right) communicating on our sustainability actions at Dartmoor Cemetery (France), Ecoivres Military Cemetery (France) & New Irish Farm Cemetery (Belgium). The sign boards are made from a 100% recycled wood alternative, constructed from post-consumer material.*

TRAINING

A range of training courses are being undertaken by our teams to enhance their understanding of sustainability issues and to improve or gain new skills to support the implementation and further development of our sustainability agenda.



(left, top & centre) The French horticultural management team undertook a 3-day **biodiversity awareness training** *course at the Conservatoire Botanique National de Bailleul, who are experts on local fauna, flora & fungi. The team learned about the importance of preserving natural habitats & local biodiversity.*

(right) Senior gardeners from Belgium undertook a training course on **adaptive land management** *&* **the soil food web***, marking the local roll-out of an evidence-based soil management approach, supported by an in-house soil lab for rapid diagnostics. Data-driven soil health interventions will make use of high-quality compost, liquid compost extract & compost tea, yielding benefits such as enhanced soil biodiversity, plant resilience & weed suppression.*

(bottom left) A **Tree Steward Certificate** *training course has been developed to support our project of establishing 39,000 trees by 2039. It will be rolled out to those who will be designing, planting & providing aftercare to the many trees being planted on our sites. The training will commence in FY 2025/26.*



MORE INFORMATION

ENVIRONMENTAL SUSTAINABILITY REPORT
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