



montrose

Improving lives through evidence and impact

# Environmental Safeguarding Policy October 2022

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## AMENDMENT LOG

Issue date	Version no.	Summary of addition or alteration	Initials
October 2018	V1	Environmental Safeguarding Policy first authorised issue	BB
November 2019	V2	Formatting/design updated	GH
January 2021	V3	Date, version number and document number updated New company logo inserted	GH
April 2022	V4	Review and dates amended	AP
October 2022	V5	Section 3.3 updated	DB

## 1. INTRODUCTION

In line with the Montrose Vision Statement of “Creating pragmatic solutions which make life better”, we believe that improvement of the quality of life of poor and vulnerable communities is directly related to environmental sustainability – namely ecosystem management, sustainable use of natural resources, and maintaining biodiversity. As a consultancy firm delivering international development, social investment, and environmental sustainability services, **Montrose is therefore committed to practicing and promoting the highest standards of environmental safeguarding**, as well as wider corporate sustainability. In other words, we seek to practice what we preach, and be a leader in environmentally sustainable business practice.

Montrose signed the UN Global Compact (UNGC) in 2018 and is currently upgrading systems and procedures to ensure our **environmental safeguarding policy** is linked to the **UNGC 10 Principles**, and our **environmental reporting** is linked to our **UNGC Communication on Progress (CoP)** annual reporting requirement. This approach is fully compliant with other international safeguarding and reporting requirements, such as those of the UK Foreign, Commonwealth and Development Office (FCDO), and the Global Reporting Initiative (GRI) G4 Guidelines.

Montrose commits to ensuring these principles are fully in place within 2019, and outlines below the steps which will be taken. Many are already in process, while others need review across our offices globally. An implementation plan and training approach will be developed to match this policy in 2019 and rolled out to all staff and consultants. Montrose will assign an Environmental champion (Director level environmental expert) to lead on this process and routine updates on corporate progress and initiatives to the Senior Management Team.

## 2. ENVIRONMENTAL SAFEGUARDING PRINCIPLES

### 2.1. UNGC Principle 7 – Montrose supports a precautionary approach to environmental challenges

Montrose works systematically to protect the environment and the public from plausible risk of harm. UNGC outlines how this can be achieved by assessing, managing, and communicating risks, and focusing on prevention rather than remediating environmental damage.

#### Core commitments

- Conducting quarterly environmental risk assessments, and compiling environmental issues registers at corporate and contract levels, including details of mitigation measures.
- Effectively planning for and managing any significant environmental impacts

Detailed commitments to the UNGC Principle 7 include the following:

#### 2.1.1. Precautionary approach

- Providing information to stakeholders about uncertainties and potential risks to workers, consumers, the public, and the environment of any company activities.
- Identifying any soil and water contamination at any activity sites, assessing the environmental impacts, and remedying any significant contamination.
- Trying to avoid any environmental damage by company activities.
- Conducting systematic (at least quarterly) environmental risk assessment and register at corporate and contract level as standard, applying the precautionary approach.

- Ensuring transparency and engaging in dialogue with any stakeholders raising concern to us on environmental issues.
- Supporting scientific research on environmental issues relating to our activities where relevant – e.g. analysis of samples taken during Environmental and Social Impact Assessments for our clients.

### 2.1.2. Emergency response

- Identifying any hazardous activities and the potential consequences on human health and the environment if an accident occurs.
- Having detailed procedures, plans, equipment, and staff training in place to prevent accidents and emergencies.
- Having detailed procedures, plans, and equipment in place to effectively respond to accidents and emergencies if they occur.
- Training workers to respond to accidents and emergencies, including carrying out emergency drills at least once a year involving all workers.
- If ever there is significant risk of impacts on local communities, having a procedure that enables us to immediately notify affected stakeholders about the emergency and the response.

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## 2.2. UNGC Principle 8 – Montrose promotes greater environmental responsibility

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Montrose is committed to reducing our own negative environmental impacts, and promoting positive ways in which our consumption of resources, reduction of harmful waste and emissions, and support to biodiversity, can make a difference.

### Core commitments

- Continually improving environmental performance
- Compliance with all local environmental legislation
- Educating and training our employees on environmental impacts, and their mitigation
- Ensuring our sub-contractors and consultants are equally aware of our environmental impacts, and work towards their mitigation with us

Detailed commitments to the UNGC Principle 8 include the following:

### 2.2.1. Energy consumption and climate change

- Compliance with all local regulations regarding use of energy resources and emissions of greenhouse gases.
- Initiation of practical activities to reduce energy consumption and/or greenhouse gas emissions – e.g. turning off appliances when not in use, and minimising air miles travelled.
- Provision of information and training for employees to implement energy reduction measures.

### 2.2.2. Water and waste water

- Having the necessary permits to extract water or obtain water from the public water supply.
- Our usage of water and waste water discharges do not negatively affect the sustainability of water resources, the natural environment, or the availability of water for drinking and sanitation purposes.
- Provision of information and training for employees to implement measures to reduce water consumption and reduce the need for waste water treatment.

### 2.2.3. Waste management

- Managing waste responsibly and continuously attempting to prevent and reduce the production of waste.
- Ensuring that waste relevant for recycling is sorted and handed over to a recycling company.
- Provision of information and training for employees on the safe handling, storage, transport and disposal of hazardous and special waste types.
- Marking areas used for storage of waste, and properly labelling all containers for storing waste, including a relevant symbol of danger for hazardous waste.

### 2.2.4. Air emissions

- Continuously attempting to prevent and reduce air emissions.
- Provision of information and training for employees on how to manage air emissions.

### 2.2.5. Noise, odour, light, and vibrations

- Continuously attempting to prevent and minimise the levels of noise, odour and light.
- Provision of information and training for employees on how to manage noise, odour, light and vibrations.

### 2.2.6. Chemicals and other dangerous substances

- Not manufacture, trade and/or use chemicals and other dangerous substances subject to national or international bans or phase-outs.
- Consideration of substitution, and continuously trying to use less harmful chemicals and substances.
- Provision of information and training for employees on the safe handling and use of chemicals and other dangerous substances.
- Marking areas used for storage of chemical substances and products.

### 2.2.7. Biodiversity

- Operating within the framework of international conventions addressing biodiversity.
- Assessing important positive and negative impacts of our activities on the natural environment and biodiversity.
- Taking measures to prevent and reduce the impacts of our activities on biodiversity.

### 2.2.8. Natural resources

- Continuously attempting to prevent, minimise and remedy significant impacts on natural resources through environmentally friendly methods and alternative resource use.
- Demonstrating efforts to substitute non-renewable resources used in activities with renewable resources.

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## 2.3. UNGC Principle 9 – Montrose utilises and promotes the use of environmentally friendly technologies

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Environmentally friendly technologies include cleaner activities and pollution prevention technologies. They can increase operating efficiencies, and reduce emissions, worker exposure, and risks of environmental damage. Montrose applies environmentally friendly technologies where appropriate, and we continuously evaluate our activities to see if it is possible to change to more environmentally friendly alternatives.

## Core commitments

- Continually improving environmental performance with regard to usage of technology
- Ensuring our employees, sub-contractors, and consultants are equally aware of our drive to increase the usage of environmentally friendly technologies

Detailed commitments to the UNGC Principle 9 include the following:

- Using environmentally friendly technology wherever possible – e.g. electronic communications.
- Considering the environmental efficiency of new technology when investing in new equipment.

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## 3. MONITORING, REPORTING AND RESPONSIBILITY

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### 3.1. Daily

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Everybody – Montrose employees, consultants, sub-contractors or any person or company acting on the behalf of Montrose – has a responsibility to ensure the abovementioned principles are implemented and adhered to. All Montrose employees are aware of this policy and the above principles, and have a daily responsibility to observe impact mitigation, and reduce resource and emission usage. Once the detailed action plan is developed and rolled out in 2019, all Montrose employees and consultants will be given training on our implementation of each principle.

In the event of any environmental incident, an Incident Report should be completed, and submitted to the Senior Management Team.

If specific contracts require specific environmental monitoring or reporting on a regular basis against contract KPIs, this is carried out by an in-house environmental expert, supported by the project manager, and submitted as required by the contract.

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### 3.2. Quarterly

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Montrose maintains a risk register at corporate level, which contains environmental risk issues. This is currently updated by senior management quarterly.

Montrose also maintains similar risk registers for each contract which we hold, which also contain environmental risk issues, and which are similarly updated quarterly, by the project manager. Our risk register template includes risk mitigation measures and a pre- and post-mitigation RAG rating per risk.

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### 3.3. Annually

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Montrose is a member of the UNGC with participant ID number 128701 since 22 January 2018, and we file our annual Communication on Progress (CoP) reports to UNGC on an annual basis. This contains a section on our environmental compliance, which is reported on against the Principles outlined in Section 1 above.

The UNGC CoP Report contains the following sections as standard:

- Period covered by the report
- Statement of continued support for UNGC membership and principles by the CEO

- Description of actions Montrose has taken in the preceding year on the following areas and principles:
  - Human Rights
  - Labour
  - Environment (this includes reporting against the principles listed above)
  - Anti-Corruption
- Measurement of outcomes – indicators are agreed annually by Montrose senior management, and incorporated into internal company reporting systems for inclusion in the CoP Report

The CoP Report is prepared internally, and is reviewed and signed off by the CEO and the Board.

If specific contracts require specific environmental monitoring or reporting on an annual basis against contract KPIs, this is carried out by an in-house environmental expert, supported by the project manager, and submitted as required by the contract.