



# Environmental Protection Policy and Procedure

## Policy History

Version date	Who updated	Details
March 2022	Benigne, Eilis and Sopha	Substantial rewrite of previous policy

## Document Control:

<b>Signoff Authority</b>	<i>Board</i>
<b>Owner signoff &amp; date</b>	<i>Chief Executive Officer (CEO), 20 May 2022</i>
<b>Compliance signoff (if required) &amp; date</b>	<i>Compliance Advisor, May 2022</i>
<b>Final signoff &amp; date</b>	<i>Board meeting 31 May 2022</i>
<b>Next review date</b>	<i>2025</i>

## **Table of Contents**

PURPOSE	2
SCOPE OF POLICY	2
GUIDING PRINCIPLES	2
POLICY AND PROCEDURES	3
POLICY UPDATES	5
ACCOUNTABILITY	5
APPENDICES	6
Annex A Program Design Document (PDD)	6
Annex B Environmental Impact Assessment Form	6
Annex C Partner Assessment Tool (PAT)	6
Annex D Responsible Investment Principles (here)	6
Annex E ACFID and DFAT References	6

## PURPOSE

Good Return seeks to be an environmentally aware organisation that practices what it preaches. This encompasses operational aspects such as travel, recycling, pollution, energy usage, where we invest our funds, in addition to program aspects, such as assessing the environmental impact of our programs. It will actively promote the importance of conservation of the natural environment, and of the fight against climate change, noting that the climate crisis acts to worsen the inequalities that keep people in poverty. Many of the countries in which we operate are vulnerable to climate change and natural disasters. The purpose of this policy is to guide staff in pursuing their responsibility to protect the environment in all activities carried out by the organisation.

- **Policy principles are in bold text**
- Procedures and controls are in red text

## SCOPE OF POLICY

This policy applies to all Good Return operations and programs. Additionally, through MOUs with Good Return partners, partners are required to undertake to manage the environmental impact (direct and indirect) of joint activities to minimise negative impacts and promote positive impacts on the environment.

## GUIDING PRINCIPLES

As a guide to implement this policy, Good Return sets out the following principles regarding protection of the natural environment.<sup>1</sup>

### 1. Do no harm

- Seek to protect and maintain the health, diversity and productivity of the environment.
- Ensure that Good Return programs and operations minimise harm to the environment.

### 2. Identify, assess and manage environmental impacts

- Identify potential environmental risks and impacts early in the project design process to ensure they are adequately assessed and that mitigation plans are put in place.
- Manage risks and impacts of programs and operations through management plans and monitor and report on their delivery.
- Avoid negative impacts, or where avoidance is not possible, minimise, mitigate or as a last resort, offset or compensate for such impacts.
- Assess and manage direct and indirect environmental effects of the programs and operations in a way that is proportional to potential impacts.

### 3. Engage effectively with stakeholders

- Be transparent about program activity as it relates to environmental risks and impacts in a way that is timely, accessible, and culturally and socially responsible.
- Provide accessible and culturally appropriate grievance redress mechanisms and ensure that any such environmental-related grievances are handled promptly, transparently, and without retribution or cost to the party that raised the concern.

---

<sup>1</sup> Adoption from [DFAT's environmental- social safeguarding policy](#)

- Disclose information about the environmental performance of programs and operations.

#### 4. Work effectively with partners

- Comply with partner country environmental safeguarding laws and policies and where possible work with partners to support this policy.
- Work with multilateral, bilateral, NGO and private sector development partners to ensure environmental and social impacts are managed in a way that is consistent with this policy.
- Harmonise with program partners' environmental safeguarding policy principles

#### 5. Promote improved environmental outcomes

- Where possible, promote improved environmental outcomes by integrating ecologically sustainable development into programs and operations.
- Improve the implementation and outcomes of programs and operations by effectively identifying and managing risks.
- In cases where partners do not have suitable environmental policies in place, seek to educate them and offer support to develop such policies and procedures.

## POLICY AND PROCEDURES

To ensure that Good Return achieves its commitments and principles toward environmental protection, the following key undertakings will be implemented by the relevant departments.

### 1. Organisation/Operations

- **Incorporate environmental considerations, activities and targets into strategic plans and annual business plans to minimise negative environmental impacts and promote positive impacts through operations and program activities.**

Consider environmental risks and opportunities as part of Strategic Planning and Annual Business Planning processes, and incorporate relevant activities and targets into these plans.

- **Appoint a focal person with accountability for monitoring the environmental impact of our activities.**

Appoint an environmental focal person with clear roles and responsibilities, covering both operational and program activities. The role and responsibilities should be available for team members to view.

- **Provide training<sup>2</sup> and other awareness-raising initiatives for staff on environmental sustainability.**

Training is provided to staff and refreshed periodically. The HR team works with an environmental impact focal person to ensure that training happens and tracks training records.

- **Provide formal training and Include an overview of the organisation's commitments to evaluating and minimising environmental impact in the induction of all staff**

Develop a training module on Good Return's approach to environmental management. The training module should be updated periodically in accordance with DFAT and ACFID development guidelines. The HR team works with the environmental focal person to ensure that training is provided for existing staff and at orientation for new staff.

- **Set performance targets to minimise environmental impact in our various operations and publicise them throughout our organisation.**

---

<sup>2</sup> Use [ACFID's training](#) on "Introduction to Climate Change and Development"

Performance targets are set, shared across the organisation and incorporated in the annual report. Operations team tracks progress.

- **Publicise our commitment and our actions in our organisation and to our stakeholders via our website and communication materials**

Develop information materials on our approach to managing environmental impact and share them across the organisation and with stakeholders..

## 2. Programs

- **Project planning and design templates include specific questions regarding the environmental impact of program activities**

Specific questions included in the project design document and design appraisal form. Refer Annex A Program Design Document and Annex B Environmental Impact Assessment Form.

- **Where there is a risk of environmental impact due to the nature of program activity, or where the location of the program has environmental vulnerabilities, create mitigation strategies to inform project design. Undertake an environmental impact assessment if necessary.**

When risks are identified during project design, environment assessment is conducted by using Environmental Impact Assessment Form attached in Annex B.

- **Include environmental impact indicators in project monitoring and evaluation**

The M&E process must include environmental impact indicators for relevant projects. These may need to be more detailed for programs connected with agriculture<sup>3</sup>. Program Impact & Effectiveness Manager and Program Managers ensure the indicators are included and tracked.

- **Project reviews and evaluations reflect on how program activities, partners and communities are supporting or impacting on the environment**

Integrate environmental questions into reviews and evaluations. MEL specialist and program manager ensure questions are integrated.

- **Plan transportation for field trips with consideration of CO2 emissions. Transport is an energy-intensive sector, accounting for approximately 23%<sup>4</sup> of total global energy-related emissions.**

When preparing annual plans and travel schedules consider what amount of travel is required and appropriate to the circumstances. Program managers track and report to the program director. Consider whether travel is necessary, and whether communication technologies and local staff can be used instead.

## 3. Partner Organisations

- **Collaborate with organisations that focus on and have expertise in environmental issues**

Identify organisations that specialise in environmental issues to support Good Return and its partners on relevant environmental issues.

- **Incorporate environmental screening questions into Partner Assessment Tool to support the selection of partners**

Partnership Leads conduct assessment using the capacity assessment tool at Annex C

- **Build awareness of the risks to the environment and environment management with partners and community members through training**

<sup>3</sup> Access to Finance program area (*impact investment and loan program*)

<sup>4</sup> The Intergovernmental Panel on Climate Change [IPCC](https://www.ipcc.ch/)

Develop environmental awareness training and share with partners. Environmental Impact focal person works with the RIF Academy team to develop the course. Partnership Leads encourage partners to engage with the training.

- **Where relevant to development activities, include explicit reference in partner agreements to expectations regarding the assessment of environment risk and impact, and ongoing monitoring of impact and mitigation strategies.**

Partner organisations are required to manage the impact of environmental risks in any joint activities. Where the partner implements impact investment programs, they are required to agree and adhere to the Responsible Investment Principles at Annex D.

## **POLICY UPDATES**

The Environmental Impact Policy and procedure will be updated every three year or earlier as required. The updates should be done inline with DFAT, ACFID development guidelines and organisational needs.

## **ACCOUNTABILITY**

To ensure the policy is implemented across the organisation and partners, accountability is shared as shown in the following table

<b>Departments</b>	<b>Policy/Procedure</b>	<b>Accountable Person</b>
Operations	Policy and Procedure Part 1: Organisation / Operations	CEO/COO
Programs	Policy and Procedure Part 2: Programs	Program Director
Programs	Policy and Procedure Part 3: Partners	Program Director

## APPENDICES

**Annex A** Program Design Document ([PDD](#))

**Annex B** Environmental Impact Assessment Form ([EIA](#))

**Annex C** Partner Assessment Tool ([PAT](#))

**Annex D** Responsible Investment Principles ([here](#))

**Annex E** **ACFID and DFAT References**

*1. Department of Foreign Affairs and Trade (DFAT) [Accreditation Guidance](#)*

*B3.3 ANGO has a policy and practices in place to assess and mitigate environmental impact where appropriate.*

*B3.8 ANGO has an Environmental Management Policy and undertakes periodic assessments of its own and its implementing partners' environmental management practice.*

*2. Australian Council for International Development (ACFID) [Code of Conduct](#)*

*3.3.1 Members demonstrate an organisational commitment to environmental sustainability and improved environmental outcomes in their development and humanitarian initiatives*

*3.3.2 Members demonstrate an organisational commitment to environmental sustainability and improved environmental outcomes in their organisation's internal operations*