# POLICY G018: ENVIRONMENTAL SAFEGUARD POLICY

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| Responsible person: | CEO | Version: | 1.1 |
| Approved by Board of Directors on: | 27 February 2019 | Scheduled review date: | November 2025 |

## PREAMBLE

This policy was written by So They Can (Australian Entity) for use across all So They Can offices. So They Can operates five offices registered in each of Australia, Kenya, Tanzania, New Zealand and USA, which are part of the So They Can Global Alliance. In this policy, 'CEO' means CEO of So They Can (Australian Entity). Unless specified otherwise the 'Board' refers to the board of So They Can (Australian Entity). This policy is intended for all So They Can staff, Board members and volunteers, in all 5 So They Can offices. So They Can procedures are consistent with So They Can policies.

## DEFINITIONS

"**Environment**" in this policy is defined as:

- Ecosystems and their constituent parts, including people and communities
- Climate and natural systems and processes
- Natural and physical resources
- Qualities and characteristics of locations, places and areas, and
- Heritage values of places; social, economic and cultural aspects of the above, including those related to indigenous peoples.

**Impact** - An impact is a change to the environment, including people and communities, whether negative or positive, or wholly or partly resulting from one or more activities. An activity / project can have direct and indirect impacts on the environment. Impacts may be cumulative (over time) or combined (more than one impact in one place).

**So They Can representative** – are all individuals and institutions who act on behalf of So They Can regardless of whether or not there is a formal legal agreement between them and So They Can. This includes, but is not limited to, all trustees, members, directors, employees, contractors, consultants, advisors, volunteers and implementing partners irrespective of which country their role is situated.

## POLICY

As recognised in the UN's Sustainable Development Goals (SDGs) which are effective from 1 January 2016, "social and economic development depends on the sustainable management of our planet's natural resources". Ensuring healthy lives and promoting well-being for all at all ages (SDG 3) is integrated with and indivisible from sustainable use of the world's natural resources.

So They Can is committed to environmental sustainability and to improving our environmental outcomes, both within the organisation's internal operations and in our development work. Our objectives include reducing

our organisational contribution to climate change and environmental degradation and improving environmental sustainability.

As an NGO working in education sector, it may not seem obvious how to integrate environmental considerations into So They Can's work, but So They Can acknowledges the reality that the environment can have far-reaching effects in obvious and sometimes not so obvious ways.

This policy applies to all So They Can Representatives as defined in this policy.

## PRINCIPLES

This So They Can Environmental Safeguard Policy adopts the environmental safeguard principles of the Australian Department of Foreign Affairs and Trade:

**Principle 1: Do Not Harm**

Protect or maintain the health, diversity and productivity of natural habitats. Apply pollution prevention and control technologies. Protect the health, welfare, and livelihoods of people including women and vulnerable groups. Provide safe and healthy working conditions. Protect and conserve natural and cultural heritage.

**Principle 2: Identify, assess and manage environmental impacts**

Identify potential environmental risks and impacts early in the investment design process, and ensure they are adequately assessed and managed in investment concepts, designs and implementation.

Avoid, or where avoidance is not possible, minimise, mitigate or as a last resort, offset or compensate for negative impacts.

Assess and manage direct and indirect environmental impacts of the investment in a way that is proportional to potential impacts.

Manage risks and impacts of the investment through management plans, and monitor and report on their delivery.

Consider the different impacts on the environment and people, including children, people of different genders, indigenous peoples and other vulnerable or disadvantaged groups. The assessment and management of potential impacts must take into account these different needs.

**Principle 3: Engage effectively with stakeholders**

Provide affected people with access to information about our work, its risks, and potential environmental impacts in a way that is timely, accessible, and culturally and socially suitable for the affected group.

Engage with affected parties and other stakeholders early in identifying and managing environmental risks and impacts, and continue this throughout the investment.

Ensure consultations include directly and indirectly affected parties, are inclusive, free of external manipulation, interference, coercion, or intimidation, and enable meaningful participation.

**Principle 4: Work effectively with partners**

Comply with partner country safeguard laws and policies and where possible build partners' capacity to develop and implement environmental governance systems.

Work with multilateral, bilateral, NGO and private sector development partners to ensure environmental impacts are managed in a way that is consistent with this policy.

Work with partners to manage safeguard risks in a way that maximises the use of country systems and avoids imposing duplicate or unnecessary safeguard assessment and management planning requirements.

**Principle 5: Promote improved environmental outcomes**

Where possible, promote improved environmental outcomes by integrating ecologically sustainable development into our programs. Improve the implementation and outcomes of our programs by effectively identifying and managing environmental risks.

## POLICY IMPLEMENTATION

- So They Can will comply with local laws and regulations. This includes the Australia's Environment Protection and Biodiversity Conservation Act 1999, legislative regulations in So They Can partner countries (Kenyan Environmental Management and Coordination Act, 1999 and Tanzanian Environmental Management Act, 2004) and any applicable multilateral environment agreements (MEAs).
- So They Can ensures that all proposed activities are screened for potential impact on environment. Where screening indicates that an environmental impact may occur, the level of risk is assessed and rated. If a negative environmental impact is likely, a proportional environmental impact assessment must be completed.
- Any impacts identified in the environmental impact assessment must be managed through an environmental management plan, a document that sets out details of how impacts will be managed, including timing, budget, roles and responsibilities. The management of safeguards must be monitored and reported as part of the implementation of the investment implementation process.
- So They Can continuously monitors environmental impact of its activities through its monitoring and evaluation processes, including program reporting.
- So They Can is committed to reducing or offsetting greenhouse gas emission and to working with partners to adapt to or mitigate unavoidable impacts.
- So They Can manages the generation of wastes, where waste cannot be avoided, reduce, recover and reuse waste. As a final option, treat, destroy, or dispose of waste in a manner that is safe for human health and the environment.
- So They Can will avoid the release of pollutants to air, water, and land due to routine and non-routine. When avoidance is not possible, minimise direct and indirect discharges
- So They Can has adopted principles of ethical procurement that involves consideration of other factors – environmental, economic and social - apart from just cost and quality committed to consideration of environmental impact in procurement.
- If So They Can undertakes any infrastructure projects that could have an impact on the natural environment So They Can will contract appropriate experts to undertake studies and advise So They Can on appropriate actions including Environmental Impact Assessment.

- So they Can is committed to promoting sustainable management of natural resources including through efficient use of resources.
- So They Can avoids impacts on natural and cultural heritage, including historical sites, landscapes and traditions and apply internationally recognised practices to manage potential impacts.
- So They Can aims to create incentives that will increase rather than reduce people's ability to adapt to climate change, such as water and energy conservation mechanisms.
- So They Can is committed to reducing or offsetting greenhouse gas emission and to working with partners to adapt to or mitigate unavoidable impacts.

## RELATED DOCUMENTS

- So They Can Policy and Manual Register
- So They Can Procurement Policy
- DFAT Environmental and Social Safeguard Policy (January 2018)

| Date | Version | Comment |
|---|---|---|
| February 2019 | 1.0 | New policy approved by the Board |
| 31 May 2021 | 1.1 | Regular policy review, no amendments |
| 13 November 2023 | 1.1 | Regular policy review, no amendments |