

Environmental Policy

Version 6.0

Classification: **Internal**

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1 Documentations and approvals

1.1 Revision history

This document is subject to revision control. The master electronic copy can be found on SP.

Version	Revision date	Summary of changes	Author
V3.1	November 2018	Revision Following staff Consultation (Nov 2016 – Dec 2017)	Shuja Mohabatzath
V4.0	March 2019	Following discussion with Ops Management Team (Feb 2018)	Simon Fletcher
V5.0	March 2019	Following discussion and input from PMG (March 2018)	Simon Fletcher
V6.0	August 2021	Draft following staff working group March 2021 – November 2021	Andrea Lee & Karolina Kaczmarek

1.2 Approvals

The document requires the following approvals:

Name	Signature	Position	Date approved	Version
Ops Management			March 2019	
PMG			March 2019	
SLT			December 2021	

1.3 Distribution

This document has been distributed to:

Distribution list	Date of issue	No. of copies
All ClientEarth staff, trustees and board members		n/a
[Published on Public Website]		
Published on SharePoint in Policies Library		
Inclusion in Trustee Report (extract)		

2 Policy statement

ClientEarth works to protect the environment and people by bringing together law, science, and policy to create practical solutions to key environmental challenges across the world. We hold governments and corporations to account in order to ensure a healthy future for the planet and we must hold ourselves to those same standards.

As such, we are dedicated to reducing the organisation's negative impact on the environment, and where possible making a positive impact, by making conscious choices in our operations and all of our programmatic activities. While the ecological and carbon footprint of ClientEarth staff, trustees and board members is small when compared to the scale of our achievements, we must hold ourselves to the highest possible standards in reducing our impact on the environment.

3 Organisation Commitment

ClientEarth commits to continually improving our environmental performance. ClientEarth intends to halve our carbon emissions, from our operations, by 2030 and to eliminate emissions entirely by 2050.¹ This will need us to reduce our emissions, consumption of resources, and waste by ensuring that, where relevant, environmental impacts are considered fundamental when making decisions, including the planning, development and implementation/delivery of core and programmatic work. As well as encouraging staff, trustees and board members to adopt sustainable working practices and behaviours in the office, when working from home or elsewhere.

The organisation has a collective responsibility to adopt and promote sustainable practices and reduce its environmental impact. It is nonetheless recognised that not all of the best practices recommended in this Environmental Policy can be implemented in all locations where the organisation has an office or where its staff, trustees or board members work. For instance, it is not always possible to elect our energy provider when we rent office facilities. Each office and all staff, trustees and board members to whom this policy applies shall do their best to implement this policy to the best of their capabilities with the resources available at their location and regularly monitor if more sustainable solutions become available.

The Environmental Policy will be continuously reviewed, updated and improved based on suggestions from our staff, trustees and board members and informed by leading external organisations and experts, with a full review every 2 years. We will also evaluate and report on the outcomes following the implementation of the policy.

4 Scope

This policy applies to all staff, trustees, board members and activities within the control of ClientEarth. The aim of the policy is to measure, understand and act to reduce the operational ecological and carbon footprint of ClientEarth as an organisation. The Environmental Policy includes guidelines and recommendations designed to inform decision making by staff, trustees and board members. By

¹ For the avoidance of doubt, offsets will not be used to meet these targets.

encouraging colleagues to consider the environmental impact of every decision, the Environmental Policy should help to create an organisational culture that pursues the lowest possible environmental (negative) impact option needed to deliver on any given objective and outcome.

The principles set out in this policy will inform other organisational policies such as (and not exhaustively) the Expenses Policy, the Travel Policy, Safety & Security Policy, IT policy, Due Diligence Policy, and Procurement Policy. All ClientEarth policies should be adopted and revised in light of this Environmental Policy. Any necessary derogations from the Environmental Policy must be justified with an explanation of how and why a derogation is needed and why the alternative decision adopted is still the best solution in light of the Environmental Policy.

ClientEarth will set environmental targets where possible and will take actions to monitor and report on the performance against those targets.

We expect all staff, trustees and board members to follow these principles as much as practically possible in delivering their work for ClientEarth, including when homeworking; and to encourage other organisations, Partners, Consultants, Funders and Suppliers, to adopt ambitious environmental policies and behaviours where possible.

5 Principles

5.1 Overarching Principle: Our actions will be aligned to our mission and programmatic aims

As an organisation we will act in a way that reduces our ecological and climate footprint and reinforces and enhances our organisational mission and programmatic work.

Accordingly, we will take all necessary steps to:

- Reduce energy consumption through, for example, the systematic turning off of lights and electronic equipment including computers, screens and plugs when leaving the office or a room; and where possible with the agreement of the building owner, install motion sensors;
- Reduce water consumption by ensuring the efficient use of water, that taps are closed properly, dishwashers are turned on only when full etc.
- Only undertake travel that is necessary to carry out work;
- Give priority to walking, cycling, public transport and zero emission vehicles as preferred modes of transport pending the situation;
- Procure energy from renewable and clean energy sources wherever possible;
- Choose financial and professional services, including banks, insurance and pension providers, without connections to carbon or polluting industries wherever possible and give priority to those that are making positive contributions;
- Avoid, or minimise, the use of harmful chemicals;

- Reduce the procurement and use of single-use items or packaging, including single-use plastics, coffee cups and office equipment;
- Only procure products that are necessary, to minimise consumption;
- Procure consumable products and services that are local and from sustainable supply chains;
- Reduce digital carbon footprint by implementing technologies and championing practices that have a lower impact;
- Not accept any funding e.g. reimbursement for travel costs or sponsorships of events, from fossil fuel companies and other industry actors who are known to engage in environmental harm;

The following principles covering travel, facilities and supplier commitments. Specific areas of impacts and opportunities that can be used as a practical guide are listed in the **Appendix I**.

5.2 Travel Commitments

ClientEarth recognises that the work we do aims to have a large and long-lasting impact in reducing emissions of greenhouse gases and air pollutants. As an international organisation, the nature of our work requires significant, and often international, travel. However, ClientEarth also recognises that we should still seek to minimise this travel wherever possible to reduce the environmental impacts of our work as much as we can, and promote more sustainable behaviours wherever possible. More detail is provided in the Travel Policy but the following working practices and guidelines apply.

5.2.1 Minimising business travel

The organisation, staff, trustees and board members will seek to minimise the necessity for business travel through:

- Carefully considering whether the trip is necessary².
- Making use of flexible working arrangements.
- Investing in and making use of telephone, video or web conferencing facilities, email or other technologies.
- Combining the requirements for business travel in order to reduce the overall impact on the environment, this includes reducing number of delegates travelling to one event or location wherever possible.

² Necessary travel defines all trips that if not taken, could cause an adverse impact on the work of the organisation, team, or individual. This may be the case, for example, of travelling for an important event where multiple partners or decision-makers will be present (as it enhances our visibility and networking); for occasional gatherings such as team strategy or away days, or festive events (as it reinforces team bonds); or for appraisals and job interviews within the organisation. This list is not prescriptive and staff, trustees and board members are expected to use their best judgement.

5.2.2 Reducing impact of business travel

The organisation, staff, trustees and board members will seek to reduce the environmental impact of all business related travel by:

- Avoiding flights where possible, using table from **Appendix II** as a guide.
- When it is not possible to avoid flights then all efforts should be made to reduce the carbon impact by giving preference to direct flights and flying economy.
- Promoting and choosing the most sustainable means of transport, while balancing the environmental impacts, including carbon emissions and air pollution, with safety, cost, productivity, time-saving, and the social impacts of travel, such as work-life balance.³
- Promoting and choosing healthy travel options such as cycling and walking, whilst also acknowledging our commitment to managing the risks that our staff, trustees and board members face when travelling for work or on behalf of the organisation.
- Use of taxis, private hire vehicles and car rentals should be avoided, especially when public transport is available, unless where necessary due to safety concerns, health/mobility issues, or, for example, when traveling with heavy work-related baggage (when it cannot be avoided) efforts should be made to share rides and car pool with colleagues where possible and safe.

5.3 Facilities Commitments

5.3.1 Regulations

ClientEarth believes that ambitious and robust legal frameworks and regulations are essential for the protection and improvement of the environment, as well as safeguarding people's health from the associated health risks.

- The organisation, staff, trustees and board members must therefore ensure that we meet, and where possible exceed, the requirements of all relevant, current and foreseen statutory regulations, codes of practice and other requirements that we adopt.
- Contractors must also comply with the same relevant regulations when working on our premises, and, where possible, when delivering work on our behalf. To this end, contractors, when possible, should sign a copy of this environmental policy and any revised version with their contract, or at the first opportunity for existing contractors.

5.3.2 Reducing, Reusing and Recycling

³ In respect of work-life balance, staff are reminded that the flexible working and TOIL policies allow recuperation of travel time spent outside normal working hours.

Overconsumption of resources and the processing of waste generate greenhouse gases and toxic pollutants, as well as impacts on the natural environment and people's health and wellbeing. It is, therefore, imperative that we all take responsibility for minimising this impact.

- The organisation, staff, trustees and board members must strive to take all reasonable steps to reduce their consumption of resources (e.g. energy, stationery, printing, IT equipment) and minimise waste, and be open to new ways of working to help minimise the organisation's negative impact on the environment.
- Where wasteful working practices and/or potential solutions and improvements are identified, individuals are encouraged to raise this with their Office Manager for further consideration by the relevant staff members/Operations team.
- Systematically recycling when solutions exist in our different office locations and reusing as many items as possible especially paper, office stationery, furniture and equipment. Recyclable waste that cannot be disposed through regular services available in offices should be recycled using specialist services on an ad hoc basis.
- Refurbishing IT and other office equipment. When refurbishing is not possible, purchasing second-hand equipment as much as possible and practicable. IT and office equipment that is no longer needed should be resold/given away by priority when it can be reused, or recycled/disposed of according to the point above.
- Encouraging the use of technology in order to use paper more efficiently, reducing the amount of paper produced and reducing the amount of incoming mail we receive (by subscribing to electronic invoicing or bank account statement systems for example), and using electronic media over paper subscriptions and publications.
- Reducing our digital carbon footprint, for example, by using IT equipment as long as possible and practicable, storing data correctly, and championing practices that have a lower impact (e.g. reducing email data storage by not sending files as attachments and clearing mailboxes on regular basis).

5.3.3 Premises/Facilities

Ensuring, where possible, either through our own actions or by negotiation with any landlord, that buildings occupied by us are designed, constructed and operated to optimise their environmental performance by:

- Minimising chemicals use and emissions of greenhouse gases and pollutants outdoors and indoors (in and around our premises) through the effective and responsible use and selection of substances/products (e.g. paints, carpets, hygiene and cleaning products, gardening and plant care) and equipment (e.g. heating and ventilation systems, photocopiers and printers, lighting).
- Requiring the use of non-disposable products in our kitchen or bathrooms in each of our offices (including use of ceramic cups, steel cutlery and cloth hand towels, the latter subject to the best and relevant H&S practices and individual health requirements).

- Ensuring any changes made to premises that ClientEarth occupies, are in line with Green Building Certification Systems⁴ (such as BREEAM or DGNB) or any equivalent in the jurisdictions where we have an office.
- As well as ensuring that our facilities are as sustainable as possible, the organisation, staff, trustees and board members must also take responsibility in promoting and adopting sustainable behaviours that help to reduce our environmental impact without compromising on people's health, wellbeing and safety. This can include the efficient use of natural lighting instead of artificial, properly powering down electrical equipment, sensibly regulating temperature, prioritising mechanical ventilation over air conditioning, and the efficient use of stationery and other office resources.

5.4 Suppliers commitments

5.4.1 Procurement

ClientEarth will be selecting only those suppliers and service providers that practice sustainability and protection of the environment. This might be evidenced through an Environmental Policy with clear targets and measures on how to achieve these, appropriate certification (e.g. ISO14001), or a mission statement. If this is not possible, compliance with this Policy will be requested where plausible, especially when procuring services. To assure this, ClientEarth will be:

- Providing a list of recommended suppliers for each office location that will be reviewed annually or when necessary.
- Using strict environmental and sustainability criteria when selecting products and services:
 - Procuring the most sustainable option as practically possible at the time of purchase/entering into a contract/agreement.
 - Opting for recycled products and/or reusable/recyclable products that have actual waste management solutions that we can use⁵, especially if used in high quantities (e.g. office supplies).
 - Choosing products that have relevant accreditations⁶ and/or where the environmental impact has been assessed.⁷
- Ensuring that any products used or derived from nature, such as timber and plants, are from sustainable sources and comply with European Union and international trade rules such as CITES (the Convention on International Trade in Endangered Species).

⁴ World Green Building Council, worldgbc.org

⁵ In some instances, products can be labelled as 'recyclable' but no waste management service is available at ClientEarth's offices to recycle them.

⁶ Such as a reputable ecolabel. Examples of ecolabels can be found using Ecolabelindex.com

⁷ Transparency in supply chain, products are made of sustainable materials and produced without use of harmful chemicals, products or services will not have a negative impact on the environment.

- Sourcing supplies and services locally when possible to reduce the impacts of transportation and reduce exporting the negative environmental impacts to other locations. If local suppliers are not available, we should choose products with the most carbon efficient shipment.
- Efforts should be made to consolidate orders as much as possible to reduce packaging and the number of delivery trips, even where sustainable delivery options are used.
- Staff should apply above principles when choosing to have personal packages delivered to the office.
- Investigating and using environmental and sustainable services, e.g. banks, financial, professional and utility services, as much as possible.

5.4.2 Catering

When ordering food for ClientEarth internal and external events and meetings, staff, trustees and board members should only use ClientEarth funds for vegetarian and vegan, and where possible organic, and locally sourced food as these have lower negative environmental impact

In some circumstances (e.g. different locations), a vegetarian/vegan-only menu can be difficult to implement or there may be cultural, religious, or otherwise sensitive situations, or individual health related dietary needs that require employees to purchase non-vegetarian/vegan catering. There may also be instances when a non-vegetarian option has a lower environmental impact, e.g. locally sourced sustainable seafood. These are considered exceptions to the policy but should not become the norm.

In addition, ClientEarth staff, trustees and board members should work with any caterer to ensure minimal food and packaging waste. Similarly, no plastic bottles or cutlery should be used during any event.

Avoiding unnecessary food packaging should also be championed in all ClientEarth's offices. Practices such as using own food containers when purchasing lunch, or all staff having reusable water bottles or using cups at their disposal in the office, should be encouraged.

Staff, trustees and board members are encouraged to purchase or request a vegetarian or vegan meal in any other situation, when the meal is paid for by ClientEarth or received when conducting any business activities on behalf the organisation (e.g. a meal at a conference) as long as it continues to have a lower environmental impact, does not go against their personal beliefs/dietary requirements and is practicable.

6 Responsibilities and Accountabilities

The Director of Operations will be the organisation's lead sustainability officer and Office Managers will be responsible for the day-to-day monitoring and management of the policy, including integrating this policy into ClientEarth's other policies and into its decision-making processes, such as travel approval. Office Managers are also responsible for monitoring any targets set in this policy.

7 Training and Communication

To assure the best implementation of this policy, ClientEarth is committed to and will be:

- Providing information to all staff, trustees and board members about the environmental policy, including new starters as part of our induction processes, with a brief explanation of the policy (including refreshers when necessary). Reminding all staff, trustees and board members of the existence of this policy (as well as of other policies) on annual basis and highlighting any changes. And exploring other practical ways to promote the policy and other relevant information to staff, trustees and board members.
- Requiring that candidates for staff, trustee or board roles commit to our environmental policy when submitting their application.
- Publishing our policy to all interested parties (including on our website and in our annual trustee report).
- Reporting on environmental targets (where targets are set) on an annual basis, on our website and annual reports.
- Using our influence to encourage our partners, service providers, funders, and other stakeholders to take action on environmental sustainability issues. For example, by requiring service providers to sign up to our environmental policy if they do not have their own where possible
- Where possible using capacity from the Ops, internal communications teams and volunteers to participate as an organisation, either globally or by office, in external campaigns to raise awareness of environmental impacts and promote more sustainable behaviours.

8 Records, statistics and monitoring

ClientEarth will be setting annual targets that will help the organisation to limit its negative impact on the environment and encourage staff, trustees and board members to adapt more sustainable behaviours. The below targets will apply to all ClientEarth offices and will be monitored by Office Managers.⁸

Principle	Baseline	Target	Actual	Comments
Office level				
Reduce energy consumption per office (gas, electricity)		-8.5%		
Reduce water consumption per office		-8.5%		

⁸ If there is no Office Manager at a particular entity, it will be agreed within the Operations team who will take responsibility for target tracking and reporting.

Encouraging more sustainable commuting practices such as cycling, walking or using public transport ⁹		8.5%		
Organisation level				
Reduce CO2 emissions from business travel (average emissions calculated annually per employee)		-8.5%		
Reduce average number of flights per person		-8.5%		

9 Policy Review

This policy will be reviewed every two years unless an urgent review is required. Targets will be set on annual basis.

⁹ Annual staff surveys to be conducted.

Appendix I

The table below summarises the main actions that staff, trustees and board members can take at an individual and organisational level to improve our environmental performance.

Staff, trustees and board members will take all necessary steps to:	The organisation will take all necessary steps to:
<ul style="list-style-type: none"> • Reduce business travel as much as possible • Prioritise the use of sustainable and healthy transport options for commuting and business travel • Meet and where possible exceed, the requirements of all relevant, current and foreseen statutory regulations, codes of practice and other requirements that we adopt. • Ensure that contractors also comply with the same relevant regulations and policies when working on our premises and, where possible, on our behalf. • Reduce our energy consumption through the efficient use of equipment, including turning equipment and lights off when not needed • Reduce our water consumption through the efficient use of water, including turning taps off and only turning dishwashers on when full. • Reduce our use of other resources, including office materials. • Avoid the use of single-use items, such as plastic bottles and paper cups, and non-recyclable resources. • Make proper use of the recycling facilities provided. • Procure resources and services for work use that are local and/or from sustainable supply chains wherever possible. • Reduce the impact of ordering resources and services for work and personal use through consolidating orders, opting for minimal and/or sustainable packaging and sustainable delivery options where possible. • Choose sustainable food and catering options when using the organisation's funds, 	<ul style="list-style-type: none"> • Support staff, trustees and board members to reduce business travel as much as possible by providing supporting mechanisms, including a travel tracker, video conferencing equipment etc. • Support staff, trustees and board members to prioritise the use of sustainable and healthy transport options by providing supporting mechanisms, including through flexible working policies, appropriate IT equipment and travel budgets, pool bicycles, secure and insured cycle parking, shower and locker facilities. • Minimise and offset the impact of business travel. • Support staff booking travel and catering or making purchases with the tools (e.g. list of suppliers) to quickly identify sustainable transport and supply options. • Acknowledge that travel by rail may be longer and/more costly than by air and support rail travel through budget and recuperation of travel time outside working hours. • Meet and where possible exceed, the requirements of all relevant, current and foreseen statutory regulations, codes of practice and other requirements that we adopt. • Ensure that contractors also comply with the same relevant regulations and policies when working on our premises and, where possible, on our behalf. • Reduce our energy and water consumption through the purchase and use of energy and water efficient equipment and through our

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<p>including prioritising vegetarian and vegan options as well as locally sourced food wherever possible.</p>	<p>choice in premises and office management practices wherever possible.</p> <ul style="list-style-type: none"> • Procure energy from renewable and clean energy sources wherever possible. • Avoid the use, or minimise, the use of harmful chemicals. • Reduce our consumption of other resources, including office materials and equipment. • Avoid the purchase and use of single-use items, such as plastic bottles and paper cups, and non-recyclable resources. • Provide sustainable waste management systems for our offices wherever possible and enable staff, trustees and board members and visitors to use these properly • Procure resources and services for work use that are local and/or from sustainable supply chains wherever possible. • Reduce the impact of ordering resources and services for work and personal use through consolidating orders, opting for minimal and/or sustainable packaging and sustainable delivery options where possible. • Choose financial and professional services, without connections to carbon or polluting industries wherever possible and give priority to those making positive contributions. • Procure sustainable catering options for the office and internal and external meetings and events, including prioritising vegetarian and vegan options as well as locally sourced food wherever possible. • Actively communicate and engage staff, trustees and board members about and on this and other related policies. • Monitor and report on progress and review this and other policies as needed.
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Appendix II

Recommended method of travel based on duration of the journey.

Type of journey	Duration of journey	Recommended method of travel	Avoid
Local journeys		<ul style="list-style-type: none"> Walking Cycling (private, pool or hire bicycles) Public transport 	<ul style="list-style-type: none"> Private vehicles or car hire with single occupancy
Regional/Short - haul journey	Journeys of < 6 hours (origin station to destination including changes, normally between countries within a continent or between the UK and continental Europe)	<ul style="list-style-type: none"> Rail Other Public Transport e.g. coach/bus Private vehicles or car hire (only where sharing and/or public transport unavailable/not safe) 	<ul style="list-style-type: none"> Private vehicles or car hire with single occupancy Airlines
International/Long -haul journey	Journeys of >6 hours	<ul style="list-style-type: none"> Rail (preferred) Airline (economy and direct) 	<ul style="list-style-type: none"> Upgrading air fare above economy (economy is less carbon intensive) Taking indirect flights

Brussels Beijing Berlin London Warsaw Madrid Los Angeles Luxembourg

ClientEarth is an environmental law charity, a company limited by guarantee, registered in England and Wales, company number 02863827, registered charity number 1053988, registered office 10 Queen Street Place, London EC4R 1BE, a registered international non-profit organisation in Belgium, ClientEarth AISBL, enterprise number 0714.925.038, a registered company in Germany, ClientEarth gGmbH, HRB 202487 B, a registered non-profit organisation in Luxembourg, ClientEarth ASBL, registered number F11366, a registered foundation in Poland, Fundacja ClientEarth Poland, KRS 0000364218, NIP 701025 4208, a registered 501(c)(3) organisation in the US, ClientEarth US, EIN 81-0722756, a registered subsidiary in China, ClientEarth Beijing Representative Office, Registration No. G1110000MA0095H836. ClientEarth is registered on the EU Transparency register number: 96645517357-19. Our goal is to use the power of the law to develop legal strategies and tools to address environmental issues.

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