



ENVIRONMENTAL SUSTAINABILITY AND MANAGEMENT POLICY

**FOR THE
INITIATIVE FOR LEGAL AID (ILA)**



ENVIRONMENTAL SUSTAINABILITY AND MANAGEMENT POLICY

INITIATIVE FOR LEGAL AID (ILA)

CHAPTER ONE

INTRODUCTION AND GENERAL PROVISIONS

1.1 Policy Title

This Policy shall be known as the **Initiative for Legal Aid South Sudan (ILA-SS) Environmental Sustainability and Management Policy**.

1.2 Background and Rationale

Initiative for Legal Aid South Sudan (ILA-SS) recognizes that a clean, healthy and sustainable environment is fundamental to human dignity, community wellbeing, sustainable development and the effective enjoyment of human rights.

ILA-SS acknowledges that environmental degradation, pollution, unsustainable use of natural resources, climate change, poor waste management and environmental hazards can disproportionately affect vulnerable and marginalized communities. These concerns are particularly relevant to communities whose livelihoods and wellbeing depend directly upon land, water, forests and other natural resources.

The Transitional Constitution of the Republic of South Sudan recognizes the right to a clean and healthy environment and places an obligation on individuals to protect the environment for present and future generations. It further recognizes the importance of preventing pollution and ecological degradation, promoting conservation and ensuring ecologically sustainable development and responsible use of natural resources.

ILA-SS therefore considers environmental sustainability to be an institutional responsibility and an important component of responsible humanitarian, development, legal aid, human rights and community-based programming.

This Policy establishes the principles, standards, responsibilities and procedures through which ILA-SS shall minimize its environmental footprint, identify and manage environmental risks, promote sustainable practices and integrate environmental considerations into its programmes, operations and institutional decision-making.

1.3 Purpose of the Policy

The purpose of this Policy is to establish an institutional framework for:



- a) promoting environmental responsibility throughout ILA-SS operations and programmes;
- b) preventing or minimizing environmental harm arising from ILA-SS activities;
- c) integrating environmental considerations into programme design, implementation, procurement and decision-making;
- d) promoting efficient and responsible use of energy, water, materials and other resources;
- e) reducing waste, pollution and unnecessary consumption;
- f) strengthening environmental awareness and responsible practices among staff, volunteers, interns, partners and other persons working with ILA-SS;
- g) identifying and managing environmental risks associated with projects and field activities;
- h) supporting climate-resilient and environmentally responsible programming;
- i) promoting environmental protection as part of ILA-SS's commitment to human rights and sustainable development; and
- j) ensuring that ILA-SS complies with applicable environmental requirements and relevant donor and partner standards.

1.4 Scope and Application

This Policy applies to all ILA-SS programmes, projects, offices, field activities and institutional operations.

It shall apply to:

- a) the Board of Directors;
- b) the Executive Director and senior management;
- c) permanent, temporary and contractual staff;
- d) volunteers and interns;
- e) consultants and technical personnel;
- f) programme and project personnel;
- g) drivers and logistics personnel;
- h) contractors, suppliers and service providers, to the extent provided for in their contracts;



- i) implementing partners where applicable; and
- j) any other person acting on behalf of or representing ILA-SS.

The Policy shall apply to both routine administrative operations and programme activities undertaken at national, state, county, payam and community levels.

1.5 Policy Objectives

ILA-SS shall pursue the following objectives:

1. To minimize the environmental impact of its institutional operations and programmes.
2. To promote sustainable use of natural resources.
3. To prevent and reduce pollution and unnecessary waste.
4. To promote responsible waste management and disposal.
5. To improve energy, water and material efficiency.
6. To incorporate environmental risk considerations into programme and project planning.
7. To promote environmentally responsible procurement and asset management.
8. To strengthen environmental awareness among staff and communities.
9. To promote climate change adaptation and resilience within appropriate programmes.
10. To ensure appropriate environmental safeguards in field activities.
11. To encourage environmentally responsible behaviour among partners, contractors and suppliers.
12. To support community participation in environmental protection and sustainable natural-resource management.
13. To contribute, where appropriate to ILA-SS's mandate and resources, to environmental rights awareness and advocacy.
14. To establish mechanisms for monitoring, reporting and continuously improving ILA-SS's environmental performance.

1.6 Guiding Principles

The implementation of this Policy shall be guided by the following principles:

1.6.1 Environmental Responsibility

ILA-SS shall recognize environmental protection as a shared institutional responsibility and shall take reasonable measures to prevent environmental harm.

1.6.2 Prevention

ILA-SS shall prioritize preventing environmental harm before it occurs rather than relying solely on remedial measures.

1.6.3 Precaution



Where an activity presents a reasonable risk of serious environmental harm, ILA-SS shall take appropriate precautionary measures even where complete scientific certainty is unavailable.

1.6.4 Sustainable Development

ILA-SS shall seek to ensure that its activities contribute to present needs without unnecessarily compromising the ability of future generations to meet their needs.

1.6.5 Resource Efficiency

ILA-SS shall promote efficient and responsible use of energy, water, paper, fuel, equipment and other resources.

1.6.6 Pollution Prevention

ILA-SS shall take reasonable measures to prevent or minimize pollution arising from its activities, including inappropriate disposal of solid, liquid and electronic waste.

1.6.7 Environmental Mainstreaming

Environmental considerations shall, where relevant, be incorporated into programme design, budgeting, procurement, implementation, monitoring and evaluation.

1.6.8 Community Participation

ILA-SS shall encourage meaningful community participation in environmental activities and shall recognize local knowledge and community priorities.

1.6.9 Do No Harm

ILA-SS shall seek to ensure that humanitarian, legal aid, human rights and development activities do not unnecessarily create environmental harm or increase community vulnerability.

1.6.10 Accountability

ILA-SS shall establish appropriate mechanisms through which environmental risks, incidents and concerns can be identified, reported, investigated and addressed.

1.6.11 Compliance

ILA-SS shall comply with applicable laws, regulations, policies, contractual requirements and donor environmental safeguards relevant to its activities.

1.6.12 Continuous Improvement



ILA-SS shall periodically review its environmental practices and take reasonable measures to improve environmental performance.

1.7 Environmental Sustainability as an Institutional Commitment

ILA-SS shall integrate environmental sustainability into its institutional culture and decision-making.

Environmental considerations shall not be treated solely as a programme issue. Where reasonably practicable, ILA-SS shall incorporate environmental responsibility into:

- a) strategic planning;
- b) programme development;
- c) project budgeting;
- d) procurement;
- e) office management;
- f) travel and transportation;
- g) asset management;
- h) waste management;
- i) staff training;
- j) partnership arrangements;
- k) monitoring and evaluation; and
- l) organizational risk management.

1.8 Relationship with Human Rights and Legal Aid

ILA-SS recognizes that environmental conditions may directly affect the enjoyment of fundamental rights, including rights relating to health, life, livelihood, food, water, housing, property and community wellbeing.

Consistent with its legal aid and human rights mandate, ILA-SS may, within its institutional capacity and programme priorities:

- a) promote awareness of environmental rights and responsibilities;



- b) support communities affected by environmental harm through appropriate legal information and referral mechanisms;
- c) document environmental concerns where relevant to human rights and access to justice;
- d) support community awareness concerning lawful and sustainable use of natural resources; and
- e) advocate for lawful, inclusive and accountable environmental governance.

1.9 Definitions

For purposes of this Policy, unless the context otherwise requires:

“Environment” means the natural and physical surroundings in which people, animals, plants and other organisms live, including land, water, air, ecosystems and natural resources.

“Environmental Impact” means any positive or negative effect that an activity, project or operation may have on the environment.

“Environmental Risk” means the likelihood that an activity may cause environmental harm, together with the potential severity of that harm.

“Environmental Incident” means an event or occurrence arising from an ILA-SS activity that causes or has the potential to cause environmental harm.

“Environmental Management” means the systematic identification, prevention, mitigation, monitoring and control of environmental risks and impacts.

“Waste” means unwanted or discarded materials generated through institutional, household, project or field activities.

“Hazardous Waste” means waste that may pose a significant risk to human health, safety or the environment because of its physical, chemical or biological characteristics.

“Sustainable Procurement” means procurement that considers environmental, social, economic and lifecycle impacts in addition to cost, quality and operational requirements.

“Climate Change” means long-term changes in climatic conditions, including changes in temperature, rainfall and the frequency or intensity of climate-related events.

“Environmental Mainstreaming” means the systematic integration of environmental considerations into organizational policies, plans, programmes, projects and operational decisions.

“ILA-SS” means Initiative for Legal Aid South Sudan.



1.10 Policy Statement

ILA-SS is committed to conducting its activities in a manner that promotes environmental responsibility, minimizes avoidable environmental harm, uses resources efficiently and supports sustainable and resilient communities.

ILA-SS shall seek to ensure that environmental considerations are incorporated into relevant institutional and programme decisions while maintaining proportionality to the scale, nature and risk of each activity.

1.11 Policy Implementation

The implementation of this Policy shall be supported through:

- a) appropriate institutional responsibilities;
- b) environmental risk identification and management;
- c) staff and volunteer awareness;
- d) sustainable operational practices;
- e) environmental considerations in procurement;
- f) appropriate project screening;
- g) monitoring and reporting;
- h) corrective action where environmental risks or incidents are identified; and
- i) periodic review and improvement of institutional environmental performance.

1.12 Effective Date and Review

This Policy shall take effect upon approval by the competent governing authority of ILA-SS.

The Policy shall be reviewed periodically, and may be reviewed earlier where there are significant changes in applicable law, institutional structure, programme activities, donor requirements or environmental risks.

Any amendment to this Policy shall be approved through the applicable ILA-SS governance process.



INITIATIVE FOR LEGAL AID SOUTH SUDAN (ILA-SS)

ENVIRONMENTAL SUSTAINABILITY AND MANAGEMENT POLICY

CHAPTER TWO

LEGAL AND INSTITUTIONAL FRAMEWORK

2.1 Applicable Legal and Regulatory Framework

ILA-SS shall implement this Policy in accordance with the applicable laws, regulations, policies, standards and administrative requirements of the Republic of South Sudan.

The relevant national framework may include, as applicable:

- a) the Transitional Constitution of the Republic of South Sudan;
- b) applicable national environmental legislation and regulations;
- c) applicable laws and regulations concerning land, water, forests, wildlife, natural resources and public health;
- d) applicable waste management, pollution control and public health requirements;
- e) applicable occupational health and safety requirements;
- f) applicable laws governing non-governmental organizations and their operations;
- g) applicable county and state-level environmental requirements; and
- h) any other legislation, regulation or administrative instrument relevant to the environmental aspects of ILA-SS activities.

Where applicable environmental legislation is amended, replaced or supplemented, ILA-SS shall take reasonable steps to ensure that this Policy remains consistent with the prevailing legal framework.

2.2 Constitutional Environmental Principles



ILA-SS recognizes the constitutional importance of environmental protection and sustainable use of natural resources.

In implementing this Policy, ILA-SS shall promote, to the extent relevant to its mandate and activities:

- a) protection of the environment;
- b) prevention of pollution and ecological degradation;
- c) conservation of biodiversity and natural resources;
- d) sustainable development;
- e) responsible use of natural resources; and
- f) protection of the environmental interests of present and future generations.

2.3 National Environmental Policy Framework

ILA-SS shall take into account applicable national environmental policies and strategies, including national frameworks relating to:

- a) environmental protection;
- b) sustainable development;
- c) climate change;
- d) biodiversity conservation;
- e) natural-resource management;
- f) pollution prevention;
- g) waste management;
- h) environmental impact assessment; and
- i) disaster risk reduction and resilience.

Where national environmental policies provide standards or expectations relevant to an ILA-SS programme or operation, such standards shall be considered during programme design and implementation.

2.4 State, County and Local Requirements



Where ILA-SS operates outside Juba or implements activities at state, county, payam or community level, the organization shall take reasonable account of applicable local environmental requirements and administrative arrangements.

Programme personnel shall, where necessary, consult the relevant authorities or community structures before undertaking activities that may have material environmental implications.

2.5 International Environmental Principles and Standards

ILA-SS recognizes relevant international environmental principles and standards and may use them as guidance where appropriate to its programmes and institutional activities.

These may include internationally recognized principles relating to:

- a) sustainable development;
- b) environmental protection;
- c) pollution prevention;
- d) climate change adaptation and mitigation;
- e) biodiversity conservation;
- f) responsible natural-resource management;
- g) environmental and social safeguards;
- h) community participation; and
- i) intergenerational equity.

International standards shall complement, and shall not be interpreted as replacing, mandatory requirements of South Sudanese law.

2.6 Donor and Partner Environmental Requirements

ILA-SS shall comply with applicable environmental and social safeguard requirements imposed by donors, funding agencies, implementing partners or contractual arrangements where such requirements form part of an approved project or agreement.

Where a donor or partner requires environmental screening, risk assessment, mitigation measures, environmental management plans or environmental reporting, the responsible ILA-SS programme shall incorporate those requirements into project implementation.



Where different applicable standards impose different requirements, ILA-SS shall seek appropriate guidance and adopt the standard that provides the most appropriate level of environmental protection, provided that doing so does not conflict with mandatory South Sudanese law.

2.7 Environmental and Social Safeguards

Where ILA-SS implements a programme or project involving activities that may create environmental or social risks, the responsible programme team shall undertake appropriate screening and risk assessment.

Depending on the nature, scale and location of the activity, environmental safeguards may address:

- a) waste generation;
- b) pollution;
- c) water use;
- d) land use;
- e) natural-resource use;
- f) biodiversity;
- g) public health;
- h) occupational and community safety;
- i) climate-related risks;
- j) community concerns; and
- k) cumulative or indirect environmental impacts.

The level of assessment shall be proportionate to the potential risk of the activity.

2.8 Institutional Environmental Framework

The implementation of this Policy shall form part of ILA-SS's broader institutional governance, risk management and accountability framework.

Environmental considerations shall be coordinated, where appropriate, with:

- a) Strategic Planning;



- b) Programme Management;
- c) Finance and Administration;
- d) Procurement and Logistics;
- e) Human Resources;
- f) Safeguarding and PSEAH;
- g) Data Protection and Privacy;
- h) Security and Risk Management;
- i) Monitoring, Evaluation, Accountability and Learning; and
- j) Legal and Compliance functions.

2.9 Relationship with Other ILA-SS Policies

This Policy shall be read together with other applicable ILA-SS policies and institutional instruments.

Particular coordination shall be maintained with policies governing:

- a) Anti-Fraud, Corruption and Whistleblowing;
- b) Data Protection and Privacy;
- c) Procurement and Asset Management;
- d) ICT;
- e) Safeguarding and PSEAH;
- f) GEDSI;
- g) Volunteer and Internship Management;
- h) Legal Aid Service Delivery;
- i) Human Resources;
- j) Security and Risk Management; and
- k) Board Governance.



Where environmental considerations overlap with another institutional policy, the relevant policies shall be applied together to achieve a coherent and risk-sensitive outcome.

2.10 Environmental Compliance Register

ILA-SS shall, where appropriate, maintain an environmental compliance register identifying key environmental laws, regulations, standards, donor requirements and institutional obligations applicable to its operations and programmes.

The register may include:

- a) the relevant legal or policy instrument;
- b) the environmental obligation;
- c) the responsible department or officer;
- d) applicable programme or operational area;
- e) compliance status;
- f) required action; and
- g) review date.

The responsible officer shall ensure that significant changes to applicable requirements are communicated to relevant personnel.

2.11 Legal and Regulatory Review

The person or unit assigned responsibility for legal and compliance matters shall periodically review developments in environmental law and policy relevant to ILA-SS.

Where a significant legal or regulatory development may affect ILA-SS operations, appropriate management shall be informed and necessary adjustments shall be made to relevant procedures.

2.12 Environmental Due Diligence

ILA-SS shall undertake reasonable environmental due diligence before entering into activities, contracts or partnerships that may present significant environmental risks.

Environmental due diligence may include:

- a) reviewing the proposed activity;
- b) identifying potential environmental risks;



- c) assessing the capacity of implementing partners or contractors;
- d) reviewing relevant permits or approvals where applicable;
- e) identifying mitigation measures; and
- f) determining whether additional environmental safeguards are necessary.

2.13 Institutional Commitment to Compliance

ILA-SS shall not knowingly undertake an activity that is prohibited by applicable environmental law.

Where an activity requires an environmental approval, permit, assessment, authorization or consultation under applicable law, the responsible ILA-SS personnel shall ensure that the requirement is addressed before the activity proceeds.

Where there is uncertainty regarding an environmental legal requirement, the matter shall be referred to the appropriate legal, management or technical authority for guidance.

2.14 Legal Interpretation

Nothing in this Policy shall be interpreted as creating a legal obligation beyond what is required by applicable law, contractual commitments or formally adopted ILA-SS standards.

Where there is a conflict between this Policy and mandatory law, mandatory law shall prevail.

Where this Policy establishes a higher internal standard that is lawful and operationally feasible, ILA-SS shall seek to apply the higher internal standard.

2.15 Institutional Review of the Framework

The legal and institutional framework supporting this Policy shall be reviewed periodically to ensure that it remains:

- a) legally compliant;
- b) consistent with ILA-SS's mandate;
- c) responsive to environmental risks;
- d) compatible with donor requirements;
- e) practical for field implementation; and
- f) aligned with recognized good practice.



Any material change to the framework shall be incorporated into subsequent revisions of this Policy or its supporting procedures.

CHAPTER THREE

ENVIRONMENTAL GOVERNANCE AND RESPONSIBILITIES

3.1 General Governance Principle

ILA-SS shall maintain a clear institutional structure for implementing, monitoring and enforcing this Policy.

Environmental responsibility shall be integrated into the organization's existing governance and management structures rather than treated as the responsibility of one individual or department alone.

All personnel shall have a responsibility to avoid unnecessary environmental harm and to comply with applicable environmental requirements within the scope of their duties.

3.2 Board of Directors

The Board of Directors shall provide overall governance oversight for environmental sustainability and environmental risk management.

The Board shall:

- a) approve this Policy and significant amendments thereto;
- b) provide strategic oversight of ILA-SS's environmental commitments;
- c) ensure that significant environmental risks are appropriately considered within institutional risk management;
- d) review significant environmental incidents or material compliance concerns brought to its attention;
- e) ensure that management has adequate systems for implementing this Policy; and
- f) promote accountability for environmental performance at the institutional level.

The Board shall not ordinarily be responsible for day-to-day implementation of environmental measures, which shall remain the responsibility of management.



3.3 Executive Director

The Executive Director shall have overall responsibility for ensuring implementation of this Policy.

The Executive Director shall:

- a) provide leadership and institutional commitment to environmental sustainability;
- b) ensure that appropriate resources are allocated for implementation;
- c) assign environmental responsibilities to relevant personnel;
- d) ensure that significant environmental risks are incorporated into organizational risk management;
- e) ensure that serious environmental incidents are appropriately investigated and addressed;
- f) ensure compliance with applicable legal and donor requirements;
- g) review environmental performance reports; and
- h) report significant environmental matters to the Board where appropriate.

3.4 Senior Management

Senior Management shall support the Executive Director in implementing this Policy.

Senior Management shall:

- a) integrate environmental considerations into operational and programme decisions;
- b) ensure that departments understand their environmental responsibilities;
- c) promote environmentally responsible institutional practices;
- d) review significant environmental risks and corrective actions;
- e) ensure that environmental considerations are incorporated into relevant plans and budgets; and
- f) promote continuous improvement in environmental performance.

3.5 Programme and Project Management

Programme and project managers shall be responsible for identifying and managing environmental risks associated with activities under their supervision.



Their responsibilities shall include:

- a) conducting or facilitating appropriate environmental screening;
- b) identifying potential environmental risks during project design;
- c) incorporating appropriate mitigation measures into workplans and budgets;
- d) ensuring that field personnel understand relevant environmental safeguards;
- e) monitoring environmental compliance during implementation;
- f) reporting environmental incidents and concerns;
- g) ensuring corrective action where necessary; and
- h) maintaining appropriate project environmental records.

3.6 Finance and Administration

The Finance and Administration function shall support implementation of this Policy through responsible financial and administrative controls.

Responsibilities may include:

- a) supporting environmentally responsible procurement;
- b) promoting efficient use of office resources;
- c) maintaining appropriate records relating to environmental expenditure where relevant;
- d) supporting energy, water and waste management measures;
- e) incorporating environmental considerations into office management;
- f) supporting environmentally responsible disposal of organizational assets; and
- g) assisting management in monitoring environmental performance.

3.7 Procurement and Logistics

Procurement and Logistics personnel shall incorporate reasonable environmental considerations into procurement and supply-chain decisions.

Responsibilities shall include:



- a) considering environmental factors when evaluating products and services;
- b) promoting durable and resource-efficient goods;
- c) minimizing unnecessary packaging where reasonably practicable;
- d) encouraging responsible disposal or recycling of obsolete equipment;
- e) considering fuel efficiency and environmental performance in vehicle and equipment procurement;
- f) communicating relevant environmental requirements to suppliers and contractors; and
- g) maintaining appropriate procurement and disposal records.

Environmental considerations shall be balanced with cost, quality, availability, operational requirements and value for money.

3.8 Human Resources and Administration

The Human Resources and Administration function shall support environmental awareness among personnel.

Responsibilities shall include:

- a) incorporating relevant environmental responsibilities into staff orientation;
- b) supporting environmental awareness and training;
- c) communicating applicable workplace environmental procedures;
- d) supporting environmentally responsible office practices;
- e) coordinating with management on environmental incidents involving staff or workplace operations; and
- f) incorporating environmental responsibilities into relevant job descriptions where appropriate.

3.9 Environmental Focal Person

ILA-SS may designate an **Environmental Focal Person** or assign environmental responsibilities to an existing staff member where the organization's size and resources make a dedicated position unnecessary.

The Environmental Focal Person shall coordinate implementation of this Policy and may:



- a) advise management on environmental matters;
- b) coordinate environmental screening and risk assessments;
- c) maintain environmental compliance and monitoring records;
- d) coordinate environmental awareness activities;
- e) monitor office environmental practices;
- f) receive and escalate environmental concerns;
- g) support investigation of environmental incidents;
- h) coordinate periodic environmental performance reviews; and
- i) prepare environmental reports for management.

The Environmental Focal Person shall not assume responsibilities that legally or institutionally belong to management, technical specialists or regulatory authorities.

3.10 Environmental Committee

Where operationally justified, ILA-SS may establish an Environmental Committee or integrate environmental responsibilities into an existing organizational committee.

The Committee may comprise representatives from:

- a) management;
- b) programmes;
- c) administration and finance;
- d) procurement and logistics;
- e) human resources;
- f) monitoring and evaluation; and
- g) other relevant functions.

The Committee may:

- a) review environmental performance;



- b) identify institutional environmental priorities;
- c) recommend corrective measures;
- d) promote environmental awareness;
- e) review environmental risks;
- f) support implementation of environmental initiatives; and
- g) advise management on improvements.

3.11 Staff Responsibilities

All ILA-SS staff shall:

- a) comply with this Policy and applicable environmental procedures;
- b) use organizational resources responsibly;
- c) avoid unnecessary waste;
- d) report environmental hazards, incidents or concerns;
- e) follow applicable waste-management procedures;
- f) use equipment and facilities responsibly;
- g) participate in relevant environmental training; and
- h) support environmentally responsible practices within their areas of work.

No employee shall deliberately engage in an activity that creates avoidable environmental harm or knowingly disregard applicable environmental safeguards.

3.12 Volunteers and Interns

Volunteers and interns shall comply with this Policy and relevant environmental procedures applicable to their duties.

ILA-SS shall provide appropriate orientation regarding:

- a) environmental responsibilities;
- b) waste management;



- c) resource conservation;
- d) field environmental safeguards; and
- e) reporting of environmental concerns.

3.13 Consultants and Contractors

Consultants, contractors and service providers engaged by ILA-SS shall comply with environmental requirements relevant to the services they provide.

Where appropriate, contracts may include provisions requiring:

- a) compliance with applicable environmental laws;
- b) appropriate waste disposal;
- c) pollution prevention;
- d) protection of ILA-SS property and premises;
- e) responsible use of resources; and
- f) reporting of environmental incidents.

Material or repeated environmental non-compliance may constitute grounds for corrective action, suspension or termination in accordance with the relevant contractual terms.

3.14 Partners and Implementing Organizations

Where ILA-SS works through implementing partners, environmental responsibilities shall be addressed according to the nature and risk of the partnership.

Where appropriate, ILA-SS may require partners to:

- a) comply with applicable environmental laws;
- b) conduct appropriate environmental screening;
- c) implement agreed mitigation measures;
- d) report significant environmental incidents;
- e) maintain environmental records; and
- f) comply with applicable donor environmental safeguards.



Partner environmental requirements shall be proportionate to the nature, scale and risk of the activities being implemented.

3.15 Drivers and Field Personnel

Drivers and field personnel shall observe environmental requirements relevant to transport and field operations.

They shall:

- a) avoid unnecessary fuel consumption;
- b) prevent inappropriate disposal of vehicle-related waste;
- c) report vehicle leaks or environmental hazards;
- d) comply with approved vehicle and fuel-management procedures;
- e) avoid unnecessary disturbance to communities and natural areas; and
- f) comply with field environmental safeguards.

3.16 Community Engagement

Where ILA-SS activities directly involve communities, programme teams shall encourage appropriate community participation in environmental matters.

Community engagement may include:

- a) environmental awareness;
- b) consultation on environmental concerns;
- c) identification of local environmental risks;
- d) promotion of sustainable practices;
- e) community-based environmental initiatives; and
- f) appropriate referral of environmental complaints.

ILA-SS shall seek to ensure that community engagement is inclusive and does not unnecessarily expose vulnerable persons to environmental or other risks.

3.17 Environmental Specialists



Where a proposed activity presents significant or technically complex environmental risks, ILA-SS shall seek appropriate technical advice.

Depending on the activity, such expertise may include:

- a) environmental assessment;
- b) waste management;
- c) occupational health and safety;
- d) water and sanitation;
- e) climate resilience;
- f) biodiversity;
- g) construction or infrastructure;
- h) pollution control; or
- i) other relevant technical fields.

ILA-SS shall not undertake technically complex environmental assessments beyond its institutional competence without obtaining appropriate professional support.

3.18 Reporting Lines

Environmental concerns shall be reported through the organization's established management and reporting structures.

Personnel may report environmental concerns to:

- a) their immediate supervisor;
- b) the Programme or Project Manager;
- c) the Environmental Focal Person;
- d) Administration or Human Resources;
- e) the Executive Director; or
- f) another authorized reporting mechanism established by ILA-SS.



Where the concern involves misconduct, fraud, retaliation, safeguarding or another matter covered by a separate institutional policy, the matter shall also be handled under the applicable policy.

3.19 Environmental Accountability

Failure to comply with this Policy may result in corrective or disciplinary action in accordance with applicable ILA-SS policies, employment terms, contracts and applicable law.

The response shall be proportionate to:

- a) the nature and seriousness of the breach;
- b) the environmental risk or harm caused;
- c) whether the conduct was intentional or negligent;
- d) whether the person had received appropriate guidance or training;
- e) whether the breach was repeated; and
- f) the corrective measures available.

3.20 Separation of Responsibilities

Where practical, environmental assessment, approval, implementation and monitoring responsibilities shall be appropriately separated to reduce conflicts of interest and improve accountability.

No individual shall be expected to approve, investigate and close a significant environmental incident entirely without appropriate oversight.

3.21 Management Review

Management shall periodically review the effectiveness of environmental governance arrangements.

The review may consider:

- a) environmental incidents;
- b) compliance findings;
- c) project environmental risks;
- d) resource consumption;



- e) waste management;
- f) staff awareness;
- g) donor requirements;
- h) community concerns; and
- i) recommendations for improvement.

3.22 Accountability to the Board

Significant environmental risks, serious incidents, material legal or regulatory non-compliance, or matters likely to materially affect ILA-SS's reputation or operations shall be escalated to the Board through the Executive Director or other appropriate governance mechanism.

The Board may request additional information, corrective measures or management action where necessary.

CHAPTER FOUR

ENVIRONMENTAL RISK MANAGEMENT

4.1 Purpose

ILA-SS shall establish a systematic and proportionate approach to identifying, assessing, preventing, mitigating and monitoring environmental risks associated with its institutional operations, programmes, projects and field activities.

Environmental risk management shall form part of the organization's broader risk-management framework and shall be integrated into programme planning and operational decision-making.

4.2 Environmental Risk Management Principles

Environmental risk management shall be guided by:

- a) prevention of environmental harm;
- b) early identification of risks;
- c) proportionality to the scale and nature of the activity;
- d) precaution where significant risks are uncertain;



- e) prioritization of mitigation measures;
- f) community and stakeholder participation where appropriate;
- g) compliance with applicable law and donor requirements; and
- h) continuous monitoring and improvement.

4.3 Environmental Risk Identification

Environmental risks shall be identified during:

- a) programme and project design;
- b) project approval;
- c) procurement planning;
- d) field activity planning;
- e) establishment or relocation of offices;
- f) construction or renovation activities;
- g) major equipment acquisition;
- h) emergency interventions where practicable;
- i) implementation monitoring; and
- j) periodic organizational risk reviews.

Risk identification shall consider both direct and reasonably foreseeable indirect environmental impacts.

4.4 Environmental Screening

ILA-SS shall undertake environmental screening for programmes and activities where environmental risks may reasonably arise.

Screening shall determine:

- a) whether the proposed activity may have environmental impacts;
- b) the nature and scale of potential impacts;



- c) whether the activity is likely to affect land, water, air, biodiversity or natural resources;
- d) whether waste or hazardous materials may be generated;
- e) whether the activity may create health or safety risks;
- f) whether climate-related risks may affect implementation;
- g) whether applicable environmental approvals or assessments may be required; and
- h) whether additional environmental safeguards are necessary.

The level of screening shall be proportionate to the activity.

4.5 Risk Classification

Where appropriate, ILA-SS may classify environmental risks as:

Low Risk: Activities with minimal or readily manageable environmental impacts.

Moderate Risk: Activities with identifiable environmental impacts requiring specific mitigation and monitoring measures.

High Risk: Activities with potentially significant, complex, irreversible or difficult-to-manage environmental impacts requiring enhanced assessment, specialist advice or additional safeguards.

ILA-SS shall not automatically classify an activity solely on the basis of its title or budget. The actual nature, location, scale and potential environmental impacts shall be considered.

4.6 Environmental Risk Assessment

Where screening identifies material environmental risks, the responsible programme or project team shall conduct an appropriate environmental risk assessment.

The assessment may consider:

- a) the source of the environmental risk;
- b) persons or communities potentially affected;
- c) environmental receptors potentially affected;
- d) likelihood of occurrence;
- e) potential severity of impact;



- f) duration and reversibility;
- g) existing controls;
- h) proposed mitigation measures;
- i) responsible persons; and
- j) monitoring requirements.

4.7 Risk Rating

Environmental risks may be assessed using a combination of:

Likelihood: the probability that the risk will occur; and

Impact: the potential severity of environmental consequences.

ILA-SS may use a simple risk matrix to categorize risks as low, moderate, substantial or high.

Where a risk is uncertain but could result in serious or irreversible environmental harm, the risk shall receive appropriate management attention notwithstanding uncertainty regarding its likelihood.

4.8 Environmental Mitigation Hierarchy

ILA-SS shall apply the following mitigation hierarchy, where practicable:

1. **Avoid** the environmental impact where possible.
2. **Minimize** impacts that cannot reasonably be avoided.
3. **Restore or remediate** affected areas where appropriate.
4. **Compensate or undertake appropriate corrective measures** only where residual impacts cannot reasonably be avoided or restored.

The preferred approach shall always be to prevent or minimize environmental harm at source.

4.9 Environmental Management Measures

Depending on the activity, environmental management measures may address:

- a) waste generation and disposal;
- b) water consumption and contamination;
- c) air pollution and dust;



- d) noise;
- e) soil disturbance;
- f) vegetation and biodiversity;
- g) fuel and chemical handling;
- h) electronic waste;
- i) sanitation;
- j) energy consumption;
- k) transportation;
- l) community health and safety;
- m) occupational environmental risks; and
- n) climate-related risks.

4.10 Environmental Management Plan

Where an activity presents material environmental risks, ILA-SS may require an Environmental Management Plan (EMP).

An EMP may specify:

- a) identified environmental risks;
- b) proposed mitigation measures;
- c) responsible persons;
- d) implementation timelines;
- e) monitoring indicators;
- f) reporting arrangements;
- g) incident-response measures; and
- h) resources required for implementation.

The level of detail shall correspond to the scale and complexity of the activity.



4.11 Environmental Considerations in Project Design

Programme teams shall, where relevant, consider environmental risks during project design rather than waiting until implementation.

Project proposals should consider:

- a) the environmental context of the intervention area;
- b) resource requirements;
- c) waste generation;
- d) transportation needs;
- e) climate-related risks;
- f) community environmental concerns;
- g) potential unintended environmental impacts; and
- h) appropriate mitigation measures.

Where environmental measures require financial resources, reasonable costs shall be incorporated into project budgets.

4.12 Environmental Risk in Emergency Activities

ILA-SS recognizes that emergency and humanitarian activities may require rapid implementation.

In emergencies, environmental screening and safeguards shall be proportionate to the urgency and nature of the intervention.

Where full assessment cannot reasonably be completed before an emergency activity begins, the responsible programme team shall:

- a) identify immediately foreseeable environmental risks;
- b) implement practical mitigation measures;
- c) document significant environmental considerations;
- d) complete further assessment as soon as reasonably practicable; and
- e) address any emerging environmental impacts.



Emergency circumstances shall not be treated as a blanket exemption from environmental responsibility.

4.13 Climate and Environmental Risk

Programme teams shall consider whether climate-related conditions may affect:

- a) programme implementation;
- b) access to communities;
- c) infrastructure;
- d) water availability;
- e) public health;
- f) livelihoods;
- g) displacement or community vulnerability; and
- h) continuity of essential services.

Where relevant, programmes shall incorporate reasonable climate adaptation and resilience measures.

4.14 Community Environmental Risks

Where an activity may materially affect surrounding communities, ILA-SS shall consider:

- a) community health and safety;
- b) access to water;
- c) land and natural-resource use;
- d) waste and sanitation;
- e) local livelihoods;
- f) community concerns; and
- g) potential disproportionate impacts on vulnerable groups.

Where appropriate, affected communities shall be informed and consulted concerning significant environmental risks and mitigation measures.



4.15 Vulnerable and Marginalized Groups

Environmental risk assessments shall, where relevant, consider whether environmental impacts may disproportionately affect:

- a) children;
- b) persons with disabilities;
- c) women and girls;
- d) older persons;
- e) displaced or conflict-affected populations;
- f) persons dependent on natural resources for livelihoods; and
- g) other vulnerable or marginalized groups.

Environmental safeguards shall be designed to avoid creating or worsening disproportionate risks.

4.16 Environmental Risk Controls

Environmental risk controls may include:

- a) operational procedures;
- b) staff training;
- c) protective equipment;
- d) waste-management arrangements;
- e) contractor requirements;
- f) environmental monitoring;
- g) community awareness;
- h) restricted access to hazardous areas;
- i) emergency-response arrangements; and
- j) technical or professional supervision.



4.17 Monitoring of Environmental Risks

Identified environmental risks shall be monitored throughout the relevant activity.

Monitoring may include:

- a) inspection;
- b) field visits;
- c) review of environmental records;
- d) staff reports;
- e) community feedback;
- f) contractor reports;
- g) incident records; and
- h) project monitoring reports.

Where monitoring identifies a significant change in risk, the mitigation measures shall be reviewed.

4.18 Environmental Incidents

Any environmental incident that causes or may reasonably cause significant harm shall be reported through the appropriate ILA-SS reporting mechanism.

Examples may include:

- a) significant pollution;
- b) inappropriate disposal of hazardous materials;
- c) serious fuel or chemical spills;
- d) significant contamination of water or land;
- e) serious environmental damage arising from field activities;
- f) unauthorized disposal of hazardous waste; or
- g) other incidents identified as significant by management.



4.19 Incident Response

Upon identification of a significant environmental incident, ILA-SS shall, where appropriate:

- a) stop or control the activity causing the harm;
- b) protect affected persons;
- c) contain the environmental impact;
- d) notify the responsible supervisor or management;
- e) seek technical assistance where necessary;
- f) notify relevant authorities where legally required;
- g) document the incident;
- h) investigate its cause; and
- i) implement corrective and preventive measures.

4.20 Corrective and Preventive Action

Where an environmental risk or incident is identified, ILA-SS shall take reasonable corrective action.

Corrective action may include:

- a) stopping an unsafe or environmentally harmful practice;
- b) repairing or replacing defective equipment;
- c) cleaning or restoring affected areas;
- d) improving waste-management arrangements;
- e) retraining personnel;
- f) strengthening supervision;
- g) revising procedures;
- h) improving contractor controls; or
- i) taking disciplinary or contractual action where appropriate.



4.21 Environmental Risk Register

ILA-SS shall maintain an environmental risk register where appropriate.

The register may record:

Risk	Likelihood	Impact	Risk Level	Mitigation	Responsible Person	Status
Waste generation	Medium	Medium	Moderate	Waste segregation and controlled disposal	Administration	Ongoing
Fuel spill	Low	High	Moderate	Proper storage and spill response	Logistics	Controlled
Excessive energy use	Medium	Low	Low	Energy conservation measures	Administration	Ongoing

The register shall be reviewed periodically and updated when significant changes occur.

4.22 Environmental Risk Escalation

Environmental risks shall be escalated where:

- a) the risk exceeds the responsible officer's authority;
- b) significant environmental harm is reasonably foreseeable;
- c) specialized technical expertise is required;
- d) legal or regulatory approval may be required;
- e) donor safeguards may be triggered;
- f) the risk affects community health or safety; or
- g) the risk may materially affect ILA-SS's reputation, operations or legal compliance.

4.23 Environmental Risk and Project Approval

Where a proposed activity presents significant environmental risks that have not been adequately addressed, management may:

- a) require further assessment;
- b) require additional mitigation measures;



- c) require specialist advice;
- d) modify the proposed activity;
- e) postpone implementation; or
- f) decline to authorize the activity.

Environmental considerations shall form part of responsible project decision-making.

4.24 Record Keeping

ILA-SS shall maintain appropriate records relating to environmental risk management, including where applicable:

- a) screening forms;
- b) risk assessments;
- c) environmental management plans;
- d) monitoring reports;
- e) environmental incidents;
- f) corrective actions;
- g) environmental approvals or permits;
- h) consultations; and
- i) environmental compliance reviews.

Records shall be maintained in accordance with ILA-SS's records-management and data-protection requirements.

4.25 Review and Continuous Improvement

ILA-SS shall periodically review its environmental risk-management approach to identify lessons, emerging risks and opportunities for improvement.

Lessons learned from environmental incidents, project implementation, community feedback, monitoring and evaluations shall be incorporated into future programmes and operational procedures where appropriate.



CHAPTER FIVE

WASTE MANAGEMENT AND POLLUTION PREVENTION

5.1 Purpose

ILA-SS shall promote responsible waste management and pollution prevention throughout its offices, programmes, projects, field activities and other operations.

The organization shall prioritize waste prevention and reduction at source, followed by reuse, recovery and appropriate disposal.

5.2 Waste Management Principles

ILA-SS shall manage waste in accordance with the following principles:

- a) prevention and reduction of unnecessary waste;
- b) reuse of materials where practicable;
- c) segregation of different waste streams;
- d) safe handling and storage;
- e) environmentally responsible disposal;
- f) prevention of pollution;
- g) protection of staff, communities and the environment; and
- h) compliance with applicable legal and donor requirements.

5.3 Waste Hierarchy

ILA-SS shall apply the following hierarchy, where practicable:

1. **Avoid** unnecessary consumption and waste generation.
2. **Reduce** the amount of waste produced.
3. **Reuse** materials where safe and practical.
4. **Recover or recycle** materials where appropriate facilities exist.
5. **Dispose** of remaining waste through safe and lawful methods.

Disposal shall not be treated as the preferred option where reasonable alternatives exist.



5.4 Waste Classification

ILA-SS may classify waste into the following broad categories:

- a) general or non-hazardous waste;
- b) recyclable waste;
- c) organic waste;
- d) electronic waste;
- e) hazardous waste;
- f) chemical or fuel-related waste; and
- g) other specialized waste identified according to the nature of the activity.

Waste shall be handled according to its characteristics and potential risks.

5.5 General Office Waste

General office waste shall be managed through appropriate collection and disposal arrangements.

Personnel shall avoid leaving waste:

- a) in offices;
- b) around office premises;
- c) in drainage systems;
- d) in public spaces; or
- e) in unauthorized disposal areas.

Waste bins shall be provided in appropriate locations where reasonably practicable.

5.6 Waste Segregation

Where practicable, ILA-SS shall segregate waste at the point of generation.

Segregation may include separate collection of:

- a) paper and cardboard;



- b) plastics;
- c) metal and glass;
- d) organic waste;
- e) electronic waste; and
- f) hazardous waste.

The organization shall adapt segregation arrangements to available local disposal and recycling facilities.

5.7 Paper Waste

ILA-SS shall promote reduction of unnecessary paper consumption through:

- a) digital communication;
- b) electronic document management;
- c) double-sided printing where appropriate;
- d) controlled printing;
- e) electronic approvals where feasible; and
- f) reuse of paper where confidentiality and data-protection requirements permit.

Confidential documents shall not be reused or disposed of in a manner that compromises confidentiality.

5.8 Plastic Waste

ILA-SS shall seek to reduce unnecessary use of single-use plastics.

Where reasonably practicable, the organization shall:

- a) use reusable containers and materials;
- b) avoid unnecessary plastic packaging;
- c) encourage suppliers to reduce excessive packaging;
- d) segregate recyclable plastics where appropriate; and



e) dispose of non-recyclable plastics responsibly.

5.9 Organic Waste

Where ILA-SS offices or project activities generate significant organic waste, reasonable measures may be adopted for:

- a) reduction;
- b) separation;
- c) composting where practical; or
- d) appropriate disposal.

Organic waste shall not be allowed to accumulate in a manner that creates health, sanitation or environmental risks.

5.10 Electronic Waste

Electronic waste may include:

- a) computers;
- b) printers;
- c) mobile phones;
- d) batteries;
- e) cables;
- f) electronic accessories;
- g) damaged electrical equipment; and
- h) other obsolete electronic devices.

Electronic waste shall not be disposed of through ordinary waste streams where doing so may create environmental or health risks.

Where feasible, obsolete equipment shall be:

- a) repaired;
- b) reused;



- c) transferred for legitimate organizational use;
- d) recycled; or
- e) disposed of through an appropriate service provider.

5.11 Data Protection and Electronic Waste

Before disposing of electronic equipment capable of storing information, ILA-SS shall ensure that organizational and personal data are appropriately removed or securely destroyed in accordance with the Data Protection and Privacy Policy.

No electronic equipment shall be disposed of merely because it is obsolete without considering information-security and data-protection requirements.

5.12 Hazardous Waste

Hazardous waste shall be handled with appropriate care.

Potential hazardous waste may include, depending on ILA-SS activities:

- a) chemicals;
- b) solvents;
- c) contaminated materials;
- d) certain batteries;
- e) fuel-related waste;
- f) damaged electrical components; and
- g) other materials identified as hazardous under applicable requirements.

Hazardous waste shall be appropriately identified, stored, handled and disposed of.

5.13 Chemical and Fuel Waste

Fuel, oils, lubricants and other potentially polluting substances shall be stored and handled in a manner that minimizes the risk of spills and contamination.

Personnel shall:

- a) use appropriate containers;



- b) prevent leakage;
- c) avoid disposal into soil, drainage systems or water bodies;
- d) report spills promptly; and
- e) follow appropriate spill-response procedures.

5.14 Waste Storage

Waste storage areas shall, where practicable:

- a) be appropriately designated;
- b) be kept clean;
- c) prevent uncontrolled access;
- d) minimize exposure to weather;
- e) prevent leakage;
- f) reduce risk to children and other vulnerable persons; and
- g) permit safe collection and disposal.

Hazardous materials shall be stored separately from general waste.

5.15 Waste Collection and Disposal

ILA-SS shall use appropriate waste collection and disposal arrangements.

Where local waste-management services are available and reasonably reliable, ILA-SS should use authorized or otherwise appropriate service providers.

Where formal waste-management infrastructure is limited, the organization shall identify the safest and most environmentally responsible practicable disposal method.

5.16 Prohibited Disposal Practices

ILA-SS personnel shall not intentionally:

- a) dump waste into rivers, streams, wetlands or other water bodies;
- b) dispose of waste in drainage channels;



- c) abandon waste in public areas;
- d) dispose of hazardous waste with ordinary waste where this creates a risk;
- e) burn waste in a manner that creates avoidable pollution or health risks; or
- f) dispose of chemicals, oils or fuel directly onto soil or into water.

5.17 Open Burning

Open burning of waste should be avoided.

Where no practical alternative exists and burning is permitted by applicable law or local requirements, it shall only be undertaken using a method that minimizes risks to health, safety and the environment.

Hazardous materials, plastics and other materials capable of producing harmful emissions shall not be openly burned.

5.18 Construction and Renovation Waste

Where ILA-SS undertakes office construction, renovation or rehabilitation, contractors shall be required, where appropriate, to manage:

- a) construction debris;
- b) packaging;
- c) damaged materials;
- d) paints and chemicals;
- e) dust;
- f) noise; and
- g) other construction-related waste.

Construction waste shall not be left in public areas or disposed of in unauthorized locations.

5.19 Pollution Prevention

ILA-SS shall take reasonable measures to prevent pollution arising from its activities.

Pollution prevention measures may address:



- a) air;
- b) water;
- c) soil;
- d) noise;
- e) chemicals;
- f) fuel;
- g) waste; and
- h) other environmental hazards.

5.20 Water Pollution Prevention

ILA-SS shall take reasonable measures to prevent contamination of surface water, groundwater and other water resources.

Personnel shall not intentionally discharge:

- a) chemicals;
- b) fuel;
- c) oils;
- d) hazardous waste;
- e) untreated wastewater; or
- f) other pollutants

into water bodies, drainage systems or surrounding land.

5.21 Air Pollution Prevention

ILA-SS shall seek to minimize unnecessary air pollution arising from:

- a) vehicle operations;
- b) generators;
- c) burning of waste;



- d) construction and renovation;
- e) dust-generating activities; and
- f) other organizational operations.

Where feasible, equipment shall be properly maintained to reduce unnecessary emissions.

5.22 Noise Pollution

ILA-SS shall take reasonable measures to minimize unnecessary noise from its offices, vehicles, equipment, construction activities and events.

Where activities may generate significant noise, consideration shall be given to:

- a) timing;
- b) location;
- c) duration;
- d) community impacts; and
- e) applicable local requirements.

5.23 Spill Prevention and Response

ILA-SS shall maintain reasonable measures for preventing and responding to fuel, chemical or other potentially harmful spills where such risks exist.

Personnel shall:

- a) immediately report significant spills;
- b) prevent the spread of the spilled material where safe to do so;
- c) protect people from exposure;
- d) use appropriate containment materials where available;
- e) arrange appropriate cleanup; and
- f) document significant incidents.

5.24 Waste Management in Field Activities



Programme teams conducting field activities shall consider waste-management arrangements before commencing activities.

Field teams shall:

- a) avoid unnecessary waste generation;
- b) carry waste away from environmentally sensitive areas where appropriate;
- c) use available designated disposal facilities;
- d) prevent littering;
- e) manage hazardous materials responsibly; and
- f) leave temporary activity sites in a reasonably clean and safe condition.

5.25 Events and Meetings

ILA-SS shall seek to reduce waste associated with meetings, workshops, trainings and public events.

Where practical, event organizers should:

- a) use digital materials;
- b) minimize unnecessary printing;
- c) avoid unnecessary single-use materials;
- d) use reusable items;
- e) provide appropriate waste bins; and
- f) arrange responsible disposal after the event.

5.26 Contractors and Waste Management

Where waste-management activities are outsourced, contractors shall be selected and managed in accordance with applicable procurement requirements.

Where appropriate, contracts shall specify:

- a) waste handling requirements;
- b) disposal responsibilities;



- c) prohibited disposal practices;
- d) reporting requirements; and
- e) consequences of non-compliance.

5.27 Community Environmental Considerations

ILA-SS shall avoid waste-management practices that unnecessarily transfer environmental risks to surrounding communities.

Where an ILA-SS activity may generate significant waste, programme personnel shall consider the capacity of the local waste-management system before implementation.

5.28 Waste Reduction Targets

Where practicable, ILA-SS may establish internal targets for reducing:

- a) paper consumption;
- b) plastic consumption;
- c) unnecessary printing;
- d) disposable materials;
- e) energy-related waste; and
- f) other significant waste streams.

Targets shall be realistic and proportionate to the organization's resources.

5.29 Training and Awareness

ILA-SS shall provide appropriate awareness to staff, volunteers and interns concerning:

- a) waste segregation;
- b) waste reduction;
- c) pollution prevention;
- d) electronic waste;
- e) hazardous materials;



- f) spill response; and
- g) responsible disposal.

5.30 Monitoring and Records

Where appropriate, ILA-SS shall maintain records relating to significant waste streams and disposal activities.

Records may include:

- a) waste collection records;
- b) disposal receipts;
- c) electronic equipment disposal records;
- d) hazardous waste records;
- e) spill reports;
- f) contractor records; and
- g) environmental inspection reports.

5.31 Environmental Incidents

Any significant pollution event, hazardous waste incident, serious spill or other environmental incident shall be reported and managed in accordance with Chapter Four and applicable ILA-SS incident-reporting procedures.

5.32 Continuous Improvement

ILA-SS shall periodically review its waste-management practices and identify opportunities to:

- a) reduce waste;
- b) improve segregation;
- c) increase reuse and recycling;
- d) improve disposal arrangements;
- e) reduce pollution; and
- f) strengthen environmental performance.



The organization shall take reasonable measures to implement feasible improvements.

CHAPTER SIX

RESOURCE AND ENERGY EFFICIENCY

6.1 Purpose

ILA-SS shall promote efficient, responsible and sustainable use of energy, water, paper, fuel, office supplies, equipment and other organizational resources.

The organization shall seek to reduce unnecessary consumption and associated environmental impacts while maintaining operational effectiveness, staff wellbeing and quality service delivery.

6.2 Resource Efficiency Principles

ILA-SS shall apply the following principles:

- a) avoid unnecessary consumption;
- b) use resources efficiently;
- c) prioritize durable and fit-for-purpose materials;
- d) reduce avoidable losses and wastage;
- e) maintain equipment properly;
- f) promote responsible staff behaviour;
- g) consider lifecycle costs where appropriate; and
- h) continuously identify opportunities for improvement.

6.3 Energy Management

ILA-SS shall promote responsible use of electricity and other energy sources in its offices, field locations and programme activities.

Personnel shall, where practicable:

- a) switch off lights when not required;
- b) switch off computers, printers and other equipment when not in use;



- c) avoid unnecessary use of air-conditioning;
- d) use natural lighting and ventilation where appropriate;
- e) report malfunctioning equipment that consumes excessive energy; and
- f) avoid unnecessary operation of generators.

6.4 Office Equipment

ILA-SS shall, where practicable, consider energy efficiency when acquiring or replacing:

- a) computers;
- b) printers;
- c) photocopiers;
- d) refrigerators;
- e) air-conditioning units;
- f) lighting equipment;
- g) generators; and
- h) other significant electrical equipment.

Procurement decisions shall also consider cost, availability, durability, functionality and value for money.

6.5 Lighting

ILA-SS shall promote efficient lighting practices.

Where reasonably practicable, the organization may use:

- a) energy-efficient lighting;
- b) natural daylight;
- c) task lighting where appropriate; and
- d) switches or controls that allow unnecessary lighting to be turned off.

6.6 Air-Conditioning and Cooling



Where air-conditioning or cooling systems are used, personnel shall operate them responsibly.

Measures may include:

- a) avoiding unnecessarily low temperature settings;
- b) keeping doors and windows appropriately managed while air-conditioning is operating;
- c) maintaining equipment regularly;
- d) switching systems off when rooms are not occupied for extended periods; and
- e) addressing defective systems promptly.

6.7 Generator Use

Where generators are used, ILA-SS shall seek to minimize unnecessary fuel consumption and emissions.

Generator operators shall:

- a) operate generators only when necessary;
- b) maintain generators appropriately;
- c) monitor fuel use;
- d) report leaks or mechanical problems;
- e) store fuel safely; and
- f) follow applicable health, safety and environmental procedures.

6.8 Renewable and Alternative Energy

Where operationally and financially feasible, ILA-SS may consider renewable or lower-impact energy solutions, including:

- a) solar power;
- b) solar lighting;
- c) solar water-heating systems;
- d) energy-efficient battery systems; and



e) other suitable technologies.

Such investments shall be evaluated on the basis of operational need, reliability, lifecycle cost, safety and environmental benefit.

6.9 Water Conservation

ILA-SS shall promote responsible use and conservation of water.

Personnel shall:

- a) avoid unnecessary water use;
- b) promptly report leaking taps, pipes or toilets;
- c) avoid leaving water running unnecessarily;
- d) use water-efficient practices where feasible; and
- e) protect water sources from contamination.

6.10 Water Quality and Protection

Water used by ILA-SS shall be managed in a manner that minimizes contamination risks.

Where ILA-SS operates offices or field facilities with water and sanitation systems, responsible personnel shall ensure, as far as reasonably practicable, that:

- a) wastewater is appropriately managed;
- b) hazardous substances are kept away from water sources;
- c) sanitation facilities are maintained; and
- d) activities do not unnecessarily contaminate surrounding water resources.

6.11 Water in Field Activities

Programme teams shall consider water availability and environmental conditions when planning field activities.

Where activities require significant water use, teams shall consider:

- a) local availability;
- b) competing community needs;



- c) sustainability of the water source;
- d) potential contamination;
- e) sanitation requirements; and
- f) reasonable conservation measures.

6.12 Paper Conservation

ILA-SS shall promote a reduction in unnecessary paper consumption.

Personnel shall, where appropriate:

- a) use electronic documents;
- b) circulate documents electronically;
- c) print only when necessary;
- d) use double-sided printing where appropriate;
- e) avoid unnecessary duplicate copies; and
- f) reuse paper where confidentiality requirements permit.

6.13 Digital Operations

ILA-SS shall promote responsible digitalization of administrative and programme processes.

Where practical, the organization may use:

- a) electronic forms;
- b) digital approvals;
- c) electronic filing;
- d) electronic meeting materials;
- e) digital training materials; and
- f) secure electronic communication.

Digitalization shall remain subject to applicable information-security, data-protection and records-management requirements.



6.14 Sustainable Use of Office Supplies

Personnel shall use office supplies responsibly.

This includes:

- a) stationery;
- b) toner and ink;
- c) envelopes;
- d) folders;
- e) packaging materials;
- f) cleaning supplies; and
- g) other consumable materials.

Departments shall avoid unnecessary stockpiling and wastage.

6.15 Inventory and Stock Management

Administration and Procurement shall maintain appropriate inventory controls to minimize:

- a) over-purchasing;
- b) expiry;
- c) deterioration;
- d) duplication;
- e) unnecessary disposal; and
- f) avoidable financial and environmental losses.

Stock levels shall be based on reasonable operational requirements.

6.16 Sustainable Asset Management

ILA-SS shall manage organizational assets in a manner that promotes durability, efficient use and responsible disposal.

Before disposing of an asset, the organization should consider whether it can reasonably be:



- a) repaired;
- b) reused;
- c) reassigned;
- d) donated in accordance with applicable rules;
- e) sold through an approved process; or
- f) recycled or otherwise responsibly disposed of.

6.17 Maintenance

Regular maintenance shall be used to extend the useful life and efficiency of organizational assets.

Relevant equipment may include:

- a) vehicles;
- b) generators;
- c) computers;
- d) air-conditioning systems;
- e) electrical equipment;
- f) plumbing systems; and
- g) other significant assets.

Poorly maintained equipment may consume more energy, generate more waste or create environmental risks.

6.18 Fuel Efficiency

ILA-SS shall promote efficient use of fuel for vehicles and generators.

Where practicable, this shall include:

- a) regular vehicle maintenance;
- b) appropriate trip planning;



- c) avoidance of unnecessary journeys;
- d) monitoring of fuel consumption;
- e) responsible driving practices; and
- f) prompt investigation of unusual fuel consumption.

6.19 Vehicle Idling

Drivers shall avoid unnecessary idling of vehicles, particularly where the vehicle is stationary for an extended period.

Exceptions may apply where idling is necessary for:

- a) safety;
- b) vehicle operation;
- c) security;
- d) weather conditions;
- e) medical or emergency circumstances; or
- f) other legitimate operational reasons.

6.20 Procurement and Resource Efficiency

Where reasonably practicable, procurement decisions shall consider the lifecycle of products and their resource requirements.

Relevant considerations may include:

- a) durability;
- b) repairability;
- c) energy efficiency;
- d) water efficiency;
- e) packaging;
- f) consumable requirements;



- g) maintenance requirements; and
- h) disposal implications.

6.21 Meetings, Workshops and Events

ILA-SS shall seek to use resources efficiently during meetings, workshops and other events.

Organizers should, where practical:

- a) use digital materials;
- b) avoid unnecessary printing;
- c) estimate participant numbers accurately;
- d) avoid unnecessary food wastage;
- e) use reusable materials;
- f) minimize unnecessary disposable items; and
- g) manage waste responsibly.

6.22 Food and Catering

Where ILA-SS provides or procures catering, it shall, where practicable, encourage:

- a) reasonable estimation of quantities;
- b) reduction of food waste;
- c) responsible handling of surplus food;
- d) reduction of unnecessary single-use materials; and
- e) environmentally responsible disposal of food waste.

6.23 Office Cleaning

Cleaning activities shall be undertaken in a manner that minimizes unnecessary environmental harm.

Where practicable:

- a) cleaning chemicals shall be used according to instructions;



- b) excessive chemical use shall be avoided;
- c) chemicals shall be stored securely;
- d) spills shall be addressed promptly; and
- e) cleaning waste shall be appropriately disposed of.

6.24 Staff Awareness

ILA-SS shall promote awareness concerning responsible resource use.

Awareness may include:

- a) office notices;
- b) staff orientation;
- c) environmental briefings;
- d) periodic reminders;
- e) training; and
- f) departmental environmental initiatives.

6.25 Environmental Performance Indicators

Where practical, ILA-SS may monitor indicators such as:

- a) electricity consumption;
- b) generator fuel consumption;
- c) water consumption;
- d) paper consumption;
- e) printing volumes;
- f) waste generation;
- g) vehicle fuel use; and
- h) use of environmentally preferable products.



Monitoring shall be proportionate to organizational capacity and available data.

6.26 Resource Consumption Records

Where relevant and reasonably practicable, Administration and Finance may maintain records of significant resource consumption.

Such records may be used to:

- a) identify unusual consumption;
- b) estimate environmental impacts;
- c) identify cost-saving opportunities;
- d) establish internal targets; and
- e) assess improvements over time.

6.27 Environmental Cost Considerations

ILA-SS recognizes that resource efficiency can produce both environmental and financial benefits.

Departments shall therefore consider reasonable opportunities to reduce unnecessary consumption and operational costs without compromising programme quality, staff safety or organizational effectiveness.

6.28 Staff Responsibility

All personnel shall contribute to responsible resource use.

Individual employees shall not be expected to undertake specialized environmental management functions, but shall be expected to avoid obvious and unnecessary wastage and comply with established organizational procedures.

6.29 Management Responsibility

Management shall provide reasonable systems, resources and guidance necessary to enable staff to comply with resource-efficiency requirements.

Environmental expectations shall be realistic and adapted to the operational circumstances of each ILA-SS office or field location.

6.30 Continuous Improvement



ILA-SS shall periodically review its resource and energy use and identify feasible measures for improvement.

Where practical, the organization may establish measurable targets for reducing:

- a) energy consumption;
- b) water use;
- c) paper consumption;
- d) fuel use;
- e) material waste; and
- f) other significant resource consumption.

Progress shall be reviewed through the organization's normal management and monitoring processes.

CHAPTER SEVEN

SUSTAINABLE PROCUREMENT AND ASSET MANAGEMENT

7.1 Purpose

ILA-SS shall integrate reasonable environmental considerations into procurement, logistics and asset-management decisions while maintaining the principles of value for money, transparency, fairness, competition, quality and operational effectiveness.

Environmental considerations shall be proportionate to the nature, value, availability and environmental impact of the goods, works or services being procured.

7.2 Sustainable Procurement Principles

ILA-SS procurement shall, where practicable, promote:

- a) prevention of unnecessary environmental harm;
- b) efficient use of resources;
- c) durable and repairable goods;



- d) reduction of unnecessary packaging;
- e) responsible waste management;
- f) energy and water efficiency;
- g) environmentally responsible supply chains;
- h) lifecycle value;
- i) compliance with applicable environmental requirements; and
- j) value for money.

Environmental considerations shall not be used arbitrarily to restrict legitimate competition or disadvantage qualified suppliers.

7.3 Integration with Procurement Policy

This Chapter shall be implemented together with the ILA-SS Procurement and Asset Management Policy and applicable procurement procedures.

Where environmental requirements are included in procurement documents, they shall be clearly stated and applied consistently to all relevant bidders.

7.4 Environmental Considerations in Procurement Planning

Where relevant, procurement planning shall consider:

- a) the environmental characteristics of the goods or services;
- b) expected useful life;
- c) energy and water requirements;
- d) maintenance requirements;
- e) consumables;
- f) packaging;
- g) transportation;
- h) repairability;
- i) disposal requirements; and



j) potential environmental risks.

7.5 Lifecycle Considerations

Where reasonably practicable, procurement decisions should consider the total lifecycle cost and environmental implications of an item rather than focusing exclusively on the initial purchase price.

Lifecycle considerations may include:

- a) purchase cost;
- b) transportation;
- c) installation;
- d) energy consumption;
- e) water consumption;
- f) maintenance;
- g) replacement parts;
- h) useful life; and
- i) disposal.

7.6 Environmentally Preferable Products

Where practical and reasonably available, ILA-SS may give preference to products that:

- a) use less energy;
- b) use fewer resources;
- c) are durable;
- d) are repairable;
- e) contain fewer hazardous substances;
- f) use recyclable or reusable materials;
- g) have minimal packaging; or



h) have lower environmental impacts over their lifecycle.

7.7 Office Supplies

Procurement of office supplies should, where feasible, consider:

- a) recycled or responsibly sourced paper;
- b) refillable stationery;
- c) durable office equipment;
- d) reusable supplies;
- e) products with reduced packaging; and
- f) products that minimize hazardous substances.

Operational requirements and local availability shall be taken into account.

7.8 Paper Procurement

ILA-SS shall seek to reduce environmental impacts associated with paper procurement.

Where reasonably practicable, procurement may prioritize:

- a) appropriately certified or responsibly sourced paper;
- b) recycled paper where suitable and available;
- c) paper with appropriate environmental characteristics; and
- d) purchasing quantities based on actual organizational requirements.

7.9 Information Technology Procurement

Where practicable, ICT procurement shall consider:

- a) energy efficiency;
- b) durability;
- c) repairability;
- d) warranty and support;



- e) expected useful life;
- f) upgradeability;
- g) responsible disposal; and
- h) data-security requirements.

Environmental considerations shall not compromise cybersecurity, information security or operational requirements.

7.10 Electrical Equipment

Procurement of electrical equipment should, where reasonably practicable, consider energy consumption and expected operating life.

This may apply to:

- a) lighting;
- b) computers;
- c) printers;
- d) refrigerators;
- e) air-conditioning systems;
- f) electrical appliances; and
- g) other significant equipment.

7.11 Vehicle Procurement

Where ILA-SS procures vehicles, environmental considerations may include:

- a) fuel efficiency;
- b) expected operating conditions;
- c) emissions;
- d) maintenance requirements;
- e) durability;



f) availability of spare parts; and

g) lifecycle cost.

Vehicle selection shall remain primarily determined by operational requirements, safety, terrain, reliability and value for money.

7.12 Fuel and Lubricant Procurement

Fuel and lubricants shall be procured, transported and stored in accordance with applicable safety, procurement and environmental requirements.

The organization shall seek to prevent:

a) leakage;

b) unnecessary losses;

c) contamination;

d) unsafe storage; and

e) improper disposal of used oils and containers.

7.13 Cleaning Products

Where reasonably practicable, ILA-SS shall consider cleaning products that:

a) are appropriate for their intended use;

b) present manageable environmental risks;

c) have clear handling instructions;

d) can be safely stored; and

e) do not unnecessarily contain hazardous substances.

Safety and effectiveness shall remain primary considerations.

7.14 Packaging

ILA-SS shall, where practicable, seek to minimize unnecessary packaging in procurement.

Suppliers may be encouraged to:



- a) use reusable packaging;
- b) minimize excessive packaging;
- c) consolidate deliveries where appropriate; and
- d) use recyclable packaging where feasible.

7.15 Supplier Environmental Requirements

Where relevant to the procurement, suppliers may be required to demonstrate compliance with applicable environmental requirements.

Such requirements may include:

- a) lawful waste disposal;
- b) pollution prevention;
- c) responsible handling of hazardous materials;
- d) environmental permits where legally required;
- e) appropriate transport and storage practices; and
- f) compliance with contractual environmental standards.

7.16 Environmental Criteria in Tendering

Where environmental considerations are material to a procurement, ILA-SS may include appropriate environmental criteria in tender or quotation documents.

Criteria shall be:

- a) relevant to the procurement;
- b) proportionate;
- c) objectively assessable;
- d) clearly stated in advance; and
- e) applied consistently.

7.17 Supplier Due Diligence



For higher-risk procurements, ILA-SS may conduct appropriate environmental due diligence on suppliers or contractors.

Due diligence may consider:

- a) environmental compliance history;
- b) relevant licenses or permits;
- c) waste-management arrangements;
- d) hazardous-material controls;
- e) environmental management systems; and
- f) capacity to meet contractual environmental requirements.

7.18 Contractual Environmental Clauses

Where appropriate, ILA-SS contracts may include clauses requiring suppliers or contractors to:

- a) comply with applicable environmental laws;
- b) prevent pollution;
- c) manage waste responsibly;
- d) protect surrounding communities;
- e) report significant environmental incidents;
- f) comply with agreed environmental management measures; and
- g) remedy environmental harm arising from their contractual activities where appropriate.

7.19 Contractor Environmental Performance

ILA-SS may monitor environmental performance of contractors where environmental risks are material.

Persistent or serious environmental non-compliance may result in:

- a) corrective action;
- b) formal notice;



- c) suspension of relevant work;
- d) withholding of approval where contractually permitted;
- e) termination in accordance with contractual provisions; or
- f) other appropriate contractual remedies.

7.20 Sustainable Logistics

ILA-SS shall seek to improve the environmental efficiency of logistics operations.

Where practical, this may include:

- a) route planning;
- b) consolidation of deliveries;
- c) avoidance of unnecessary transport;
- d) appropriate vehicle selection;
- e) fuel monitoring; and
- f) responsible packaging and handling.

7.21 Asset Management Principles

ILA-SS shall manage assets in a manner that promotes:

- a) efficient use;
- b) durability;
- c) maintenance;
- d) repair;
- e) reuse;
- f) accountability; and
- g) responsible disposal.

7.22 Asset Maintenance



Assets shall be appropriately maintained to extend their useful life and minimize unnecessary replacement.

Maintenance requirements shall be incorporated into asset-management planning where appropriate.

7.23 Repair and Reuse

Before replacing an asset, the responsible department should consider whether it can reasonably be:

- a) repaired;
- b) upgraded;
- c) reassigned;
- d) reused for another function; or
- e) transferred to another ILA-SS office or programme.

Replacement shall be based on operational, financial, safety and lifecycle considerations.

7.24 Asset Disposal

Assets shall only be disposed of through approved ILA-SS procedures.

Disposal methods may include:

- a) transfer;
- b) reuse;
- c) donation where permitted;
- d) sale through an approved process;
- e) recycling; or
- f) responsible destruction or disposal.

Disposal shall comply with applicable procurement, financial, asset-management, data-protection and environmental requirements.

7.25 Electronic Asset Disposal



Before disposing of computers, phones, storage devices or other information-bearing equipment, ILA-SS shall ensure that:

- a) organizational data are securely removed;
- b) personal information is protected;
- c) disposal is appropriately documented; and
- d) electronic waste is handled responsibly.

7.26 Hazardous Asset Disposal

Assets containing hazardous substances or components shall not be disposed of through ordinary waste streams where doing so may create environmental or health risks.

Appropriate specialist disposal or collection arrangements shall be used where available and reasonably practicable.

7.27 Inventory Control

ILA-SS shall maintain appropriate asset and inventory records in accordance with its financial and asset-management procedures.

Accurate records shall help prevent:

- a) unnecessary procurement;
- b) loss;
- c) duplication;
- d) premature disposal; and
- e) inefficient resource use.

7.28 Environmental Considerations in Asset Replacement

Asset replacement decisions may consider:

- a) current condition;
- b) repair costs;
- c) energy efficiency;



- d) useful life;
- e) operational requirements;
- f) safety;
- g) environmental implications; and
- h) total lifecycle cost.

7.29 Donations and Transfers

Where ILA-SS transfers or donates assets, it shall ensure that such transfers comply with applicable organizational, donor and legal requirements.

Environmental considerations shall be taken into account where the transferred asset may create significant disposal or environmental risks for the recipient.

7.30 Procurement Records

Procurement records shall document environmental requirements or criteria where such considerations formed part of the procurement process.

The records may include:

- a) environmental specifications;
- b) supplier declarations;
- c) environmental evaluation criteria;
- d) relevant permits or certifications;
- e) contractual environmental clauses; and
- f) monitoring records.

7.31 Conflict of Interest and Integrity

Environmental procurement criteria shall not be manipulated to favor particular suppliers or products without legitimate justification.

All procurement personnel shall comply with ILA-SS's applicable conflict-of-interest, anti-fraud and procurement requirements.

7.32 Value for Money



Sustainable procurement shall not be interpreted as requiring ILA-SS to purchase the most expensive environmentally preferable product.

The organization shall seek the best overall value considering:

- a) price;
- b) quality;
- c) durability;
- d) operational suitability;
- e) lifecycle cost;
- f) environmental impact; and
- g) availability.

7.33 Local Market Considerations

ILA-SS recognizes that environmentally preferable products and services may not always be available or affordable in South Sudan.

Where a preferred option is unavailable, impractical or disproportionately costly, procurement personnel shall document reasonable considerations and select an appropriate alternative.

7.34 Training

Relevant procurement, logistics, finance and programme personnel shall receive appropriate awareness concerning sustainable procurement and environmentally responsible asset management.

7.35 Monitoring

ILA-SS may periodically review:

- a) environmentally preferable procurement;
- b) supplier compliance;
- c) asset utilization;
- d) asset disposal;
- e) electronic waste;



- f) fuel and transport efficiency; and
- g) other relevant environmental procurement indicators.

7.36 Continuous Improvement

ILA-SS shall periodically review procurement and asset-management practices to identify practical opportunities to reduce environmental impacts while maintaining transparency, value for money and operational effectiveness.

CHAPTER EIGHT

TRAVEL, TRANSPORT AND FIELD OPERATIONS

8.1 Purpose

ILA-SS recognizes that travel, transportation and field operations may contribute to fuel consumption, air pollution, waste generation, resource use and other environmental impacts.

The organization shall therefore promote safe, efficient and environmentally responsible travel and field practices without compromising staff security, programme effectiveness or the organization's legal and humanitarian mandate.

8.2 Scope

This Chapter applies to:

- a) official organizational travel;
- b) ILA-SS vehicles;
- c) hired and contracted vehicles used for ILA-SS activities;
- d) drivers;
- e) staff, volunteers and interns travelling on official business;
- f) programme and field teams;
- g) workshops, trainings and community activities; and
- h) other transportation arrangements undertaken on behalf of ILA-SS.

8.3 Travel and Transport Principles



ILA-SS shall promote:

- a) necessity and efficiency of travel;
- b) safe transportation;
- c) efficient use of fuel;
- d) responsible vehicle maintenance;
- e) reduction of unnecessary emissions;
- f) appropriate route planning;
- g) responsible management of vehicle-related waste;
- h) compliance with security requirements; and
- i) operationally appropriate travel decisions.

Environmental considerations shall never override mandatory security, medical, emergency or humanitarian requirements.

8.4 Travel Planning

Before undertaking official travel, personnel shall, where reasonably practicable, consider:

- a) whether the journey is necessary;
- b) whether remote communication can reasonably achieve the objective;
- c) the most efficient route;
- d) appropriate mode of transport;
- e) number of persons travelling;
- f) security conditions;
- g) environmental conditions; and
- h) opportunities to combine multiple activities into one journey.

8.5 Remote Meetings

Where appropriate and operationally feasible, ILA-SS may use:



- a) telephone calls;
- b) video conferences;
- c) online meetings;
- d) electronic document exchange; and
- e) other digital communication methods

to reduce unnecessary travel.

Remote communication shall not be required where it is impractical, insecure or inconsistent with programme objectives.

8.6 Consolidation of Travel

Where practical, programme teams shall consider combining multiple activities or appointments into a single journey.

Travel planning may consider:

- a) geographic proximity;
- b) programme schedules;
- c) availability of personnel;
- d) security conditions; and
- e) operational requirements.

8.7 Vehicle Selection

Vehicles used for ILA-SS activities shall be appropriate to the operational environment.

Where reasonably practicable, vehicle selection may consider:

- a) fuel efficiency;
- b) reliability;
- c) maintenance requirements;
- d) vehicle capacity;



- e) road and terrain conditions;
- f) safety;
- g) emissions; and
- h) lifecycle cost.

Operational and security requirements shall remain primary considerations.

8.8 Vehicle Maintenance

ILA-SS vehicles shall be maintained in accordance with approved maintenance schedules.

Proper maintenance shall help:

- a) improve fuel efficiency;
- b) reduce unnecessary emissions;
- c) prevent leaks;
- d) extend vehicle life;
- e) reduce breakdowns; and
- f) improve road safety.

8.9 Fuel Management

Fuel used for organizational vehicles and generators shall be managed in accordance with ILA-SS financial, logistics and asset-management procedures.

Where appropriate, records shall include:

- a) date of refueling;
- b) vehicle or equipment identification;
- c) quantity of fuel;
- d) relevant mileage or operating hours; and
- e) responsible driver or operator.

Unusual fuel consumption shall be investigated where appropriate.



8.10 Fuel Storage

Where ILA-SS stores fuel, storage arrangements shall:

- a) minimize leakage;
- b) protect fuel containers from damage;
- c) reduce fire and environmental risks;
- d) prevent contamination of soil and water;
- e) restrict unauthorized access; and
- f) comply with applicable safety requirements.

8.11 Vehicle Idling

Drivers shall avoid unnecessary idling.

Idling may be permitted where necessary for:

- a) security;
- b) passenger safety;
- c) vehicle operation;
- d) extreme weather conditions;
- e) emergency response;
- f) medical circumstances; or
- g) other legitimate operational requirements.

8.12 Driving Practices

Drivers shall adopt responsible driving practices that support:

- a) road safety;
- b) fuel efficiency;
- c) reduced vehicle wear;



- d) reduced emissions; and
- e) prevention of unnecessary environmental harm.

Drivers shall comply with ILA-SS vehicle, security and road-safety procedures.

8.13 Vehicle Waste

Vehicle-related waste shall be managed responsibly.

Used:

- a) oils;
- b) lubricants;
- c) filters;
- d) batteries;
- e) tires;
- f) containers; and
- g) other maintenance materials

shall not be discarded in unauthorized locations.

8.14 Vehicle Repairs and Maintenance Sites

Where vehicle maintenance is outsourced, ILA-SS shall, where practicable, use service providers capable of responsibly managing used oils, batteries, tires and other vehicle-related waste.

Contractual arrangements may include environmental requirements where appropriate.

8.15 Public and Shared Transport

Where safe, practical and consistent with security requirements, ILA-SS may use shared or public transportation for appropriate activities.

The decision shall take into account:

- a) security;
- b) accessibility;



- c) cost;
- d) reliability;
- e) programme requirements; and
- f) environmental considerations.

8.16 Air Travel

Air travel may be used where operationally necessary.

Where travel by air is required, personnel should, where practical:

- a) avoid unnecessary trips;
- b) combine related meetings where possible;
- c) use direct routes where operationally reasonable; and
- d) comply with applicable travel and security policies.

Environmental considerations shall not compromise programme delivery or staff safety.

8.17 Field Activity Planning

Before undertaking field activities, programme teams shall consider environmental conditions relevant to the activity.

This may include:

- a) waste-management arrangements;
- b) water availability;
- c) sanitation;
- d) local ecosystems;
- e) climate and weather;
- f) community environmental concerns;
- g) fuel requirements;
- h) potential pollution; and



i) environmental sensitivity of the activity location.

8.18 Field Site Selection

Where ILA-SS has discretion over the location of temporary field activities, consideration should be given to:

- a) environmental sensitivity;
- b) community impact;
- c) access to sanitation;
- d) waste disposal;
- e) water availability;
- f) safety;
- g) accessibility; and
- h) operational suitability.

8.19 Temporary Field Offices and Facilities

Temporary field offices shall, where practicable:

- a) minimize waste;
- b) conserve water and energy;
- c) maintain appropriate sanitation;
- d) prevent pollution;
- e) manage fuel and chemicals responsibly; and
- f) leave the premises or site in an appropriate condition when operations end.

8.20 Field Waste Management

Field teams shall plan for waste management before activities begin.

Personnel shall:

- a) minimize waste;



- b) avoid littering;
- c) use designated disposal arrangements where available;
- d) carry waste to an appropriate disposal location where necessary;
- e) prevent hazardous waste from entering ordinary waste streams; and
- f) leave temporary activity areas reasonably clean.

8.21 Water and Sanitation in the Field

Field activities shall consider the availability of safe water and appropriate sanitation.

Where ILA-SS establishes temporary facilities, reasonable measures shall be taken to prevent:

- a) open defecation where avoidable;
- b) contamination of water sources;
- c) uncontrolled wastewater discharge;
- d) accumulation of waste; and
- e) other avoidable sanitation-related environmental risks.

8.22 Community and Environmental Sensitivity

Field personnel shall respect communities and environmentally sensitive locations.

Unless necessary for an authorized programme activity, personnel shall avoid:

- a) unnecessary destruction of vegetation;
- b) disturbance of water sources;
- c) littering;
- d) unnecessary noise;
- e) unauthorized extraction of natural resources; and
- f) other avoidable environmental disturbance.

8.23 Natural Resource Use



ILA-SS personnel shall not use or remove natural resources for personal or organizational purposes in connection with field activities unless such use is lawful, authorized and necessary.

This includes unnecessary collection or destruction of:

- a) trees;
- b) vegetation;
- c) wildlife;
- d) water resources; and
- e) other natural resources.

8.24 Biodiversity Considerations

Where field activities occur in or near environmentally sensitive areas, programme personnel shall take reasonable measures to avoid unnecessary disturbance of biodiversity.

Where significant biodiversity risks are identified, appropriate technical advice shall be sought.

8.25 Climate and Weather Conditions

Field teams shall consider climate and weather conditions that may affect environmental and operational risks.

Relevant considerations may include:

- a) flooding;
- b) drought;
- c) extreme heat;
- d) heavy rainfall;
- e) erosion;
- f) road conditions; and
- g) other climate-related hazards.

8.26 Emergency and Humanitarian Field Operations



During emergencies, environmental measures shall be applied proportionately to the circumstances.

Where rapid deployment is required, field teams shall, as far as reasonably practicable:

- a) prevent avoidable environmental harm;
- b) manage waste responsibly;
- c) protect water sources;
- d) use fuel and resources efficiently;
- e) comply with relevant environmental safeguards; and
- f) address environmental risks as soon as practicable.

8.27 Community Events and Outreach

Field-based community meetings, legal-awareness activities, trainings and outreach events shall incorporate reasonable environmental practices.

Organizers should:

- a) minimize unnecessary printing;
- b) reduce disposable materials;
- c) provide appropriate waste arrangements;
- d) avoid unnecessary environmental disturbance; and
- e) leave activity sites reasonably clean.

8.28 Accommodation

Where ILA-SS personnel stay in hotels, guesthouses or other accommodation during official travel, personnel are encouraged to use resources responsibly.

Where reasonably practicable, staff may:

- a) avoid unnecessary water wastage;
- b) switch off lights and electrical equipment when not needed;
- c) avoid unnecessary waste;



- d) use towels and other resources responsibly; and
- e) follow reasonable environmental practices of the accommodation provider.

8.29 Travel Safety and Environmental Considerations

Environmental considerations shall always be balanced against staff security and safety.

Personnel shall not be required to:

- a) use an unsafe mode of transport;
- b) travel through unsafe areas;
- c) delay emergency response;
- d) compromise security procedures; or
- e) take unreasonable risks

solely for environmental reasons.

8.30 Travel Records

Where required by ILA-SS travel and logistics procedures, travel records shall be maintained.

These may include:

- a) travel authorization;
- b) destination;
- c) purpose;
- d) vehicle information;
- e) mileage;
- f) fuel consumption; and
- g) relevant environmental or safety incidents.

8.31 Environmental Incidents During Travel

Environmental incidents involving ILA-SS vehicles or field operations shall be reported promptly.



Such incidents may include:

- a) fuel spills;
- b) oil leaks;
- c) significant vehicle-related pollution;
- d) improper disposal of hazardous materials;
- e) significant damage to environmentally sensitive areas; or
- f) other incidents capable of causing material environmental harm.

8.32 Contractor and Hired Transport

Where ILA-SS uses hired vehicles or transport contractors, relevant environmental and safety requirements shall be communicated where appropriate.

Contractors shall be expected to comply with applicable law and contractual requirements.

8.33 Driver and Field Personnel Training

Drivers and relevant field personnel shall receive appropriate awareness concerning:

- a) fuel efficiency;
- b) vehicle maintenance;
- c) spill response;
- d) waste management;
- e) environmental incident reporting;
- f) field environmental safeguards; and
- g) relevant organizational procedures.

8.34 Monitoring and Performance

Where practicable, ILA-SS may monitor:

- a) fuel consumption;
- b) vehicle mileage;



- c) vehicle maintenance;
- d) travel frequency;
- e) significant travel-related incidents; and
- f) other relevant environmental indicators.

The purpose of monitoring shall be to improve efficiency and identify avoidable environmental impacts.

8.35 Continuous Improvement

ILA-SS shall periodically review travel and field-operation practices and identify reasonable opportunities to:

- a) reduce unnecessary travel;
- b) improve fuel efficiency;
- c) improve waste management;
- d) strengthen field safeguards;
- e) reduce pollution; and
- f) improve environmental performance without compromising safety or programme effectiveness.

CHAPTER NINE

ENVIRONMENTAL SAFEGUARDS IN PROGRAMMES AND PROJECTS

9.1 Purpose

ILA-SS shall integrate appropriate environmental safeguards into the design, approval, implementation, monitoring and evaluation of its programmes and projects.

Environmental safeguards shall be proportionate to the nature, scale, location and potential environmental risk of each intervention.



ILA-SS recognizes that environmental considerations are relevant not only to infrastructure or natural-resource projects but also, where appropriate, to legal aid, human rights, governance, civic education, community awareness, research, livelihoods and other programmes.

9.2 Environmental Mainstreaming

Environmental considerations shall, where relevant, be integrated throughout the programme cycle, including:

- a) needs assessment;
- b) programme design;
- c) budgeting;
- d) implementation;
- e) procurement;
- f) field operations;
- g) monitoring;
- h) evaluation; and
- i) lessons learned.

Programme teams shall consider both potential negative environmental impacts and opportunities for positive environmental outcomes.

9.3 Programme Environmental Screening

Before approval or commencement of a programme or project presenting potential environmental risks, the responsible programme team shall conduct appropriate environmental screening.

Screening shall consider:

- a) the nature of the intervention;
- b) location and environmental context;
- c) use of natural resources;
- d) waste generation;



- e) pollution risks;
- f) community health and safety;
- g) climate-related risks;
- h) biodiversity considerations;
- i) land or water impacts;
- j) vulnerable groups; and
- k) applicable legal and donor requirements.

9.4 Proportionality

Environmental safeguards shall be proportionate to the potential risk.

A low-risk legal awareness workshop shall not be subject to the same environmental requirements as a construction, rehabilitation, water, livelihood or infrastructure project.

Programme teams shall avoid unnecessary administrative requirements while ensuring that material environmental risks are adequately addressed.

9.5 Environmental Screening Categories

Where appropriate, ILA-SS may categorize proposed activities as:

Category A — Minimal Environmental Risk: Activities expected to have negligible environmental impacts.

Category B — Manageable Environmental Risk: Activities with limited or moderate impacts that can reasonably be managed through standard mitigation measures.

Category C — Significant Environmental Risk: Activities with potentially substantial, complex or difficult-to-reverse impacts requiring enhanced assessment, specialist advice or additional safeguards.

The categorization shall be based on actual risks rather than programme title or budget alone.

9.6 Project Design

Where environmental risks are identified, the project design shall incorporate appropriate mitigation measures.

These may include:



- a) avoidance of environmentally sensitive locations;
- b) reduction of resource consumption;
- c) waste-management arrangements;
- d) pollution controls;
- e) water and sanitation measures;
- f) community consultation;
- g) climate adaptation measures;
- h) restoration measures; and
- i) environmental monitoring.

9.7 Environmental Budgeting

Where environmental safeguards require financial resources, reasonable costs shall be incorporated into project budgets.

Such costs may include:

- a) waste collection;
- b) environmental assessments;
- c) specialist advice;
- d) protective equipment;
- e) environmental monitoring;
- f) restoration or rehabilitation; and
- g) environmental awareness activities.

Environmental measures shall not be excluded from project budgets merely because they are not directly related to the primary programme output.

9.8 Environmental Management Plans

Where appropriate, a project shall have an Environmental Management Plan identifying:



- a) environmental risks;
- b) mitigation measures;
- c) responsible persons;
- d) timelines;
- e) monitoring indicators;
- f) reporting arrangements; and
- g) corrective actions.

The Environmental Management Plan shall form part of the project's implementation framework where required.

9.9 Legal Aid and Human Rights Programming

ILA-SS recognizes the relationship between environmental conditions and access to justice and human rights.

Where consistent with its mandate, ILA-SS may integrate environmental considerations into:

- a) legal awareness;
- b) community legal education;
- c) human rights awareness;
- d) legal research;
- e) documentation of rights concerns;
- f) advocacy;
- g) referral and legal assistance; and
- h) policy dialogue.

Environmental issues shall not be represented as legal claims without appropriate factual and legal assessment.

9.10 Environmental Rights Awareness



Where environmental rights form part of an approved programme, ILA-SS may provide communities with information concerning:

- a) environmental responsibilities;
- b) lawful use of natural resources;
- c) pollution and environmental harm;
- d) community participation;
- e) access to relevant authorities;
- f) lawful complaint mechanisms; and
- g) available legal assistance or referral pathways.

9.11 Community Participation

Where a project may materially affect communities, ILA-SS shall encourage meaningful and appropriate community participation.

Participation may include:

- a) information sharing;
- b) consultation;
- c) identification of environmental risks;
- d) community feedback;
- e) participation in mitigation measures; and
- f) monitoring of relevant impacts.

Community participation shall be conducted in a manner appropriate to the context and shall not create unreasonable expectations concerning ILA-SS's authority or resources.

9.12 Free, Prior and Informed Consultation

Where appropriate to the nature of an intervention, ILA-SS shall promote meaningful consultation with affected communities before implementing activities that may materially affect their environment, livelihoods or access to natural resources.

Consultation shall be conducted in an accessible and culturally appropriate manner.



9.13 Inclusion of Vulnerable Groups

Programme teams shall consider whether environmental risks may disproportionately affect vulnerable or marginalized persons.

Where relevant, programmes shall ensure appropriate participation of:

- a) women and girls;
- b) children and young people;
- c) persons with disabilities;
- d) older persons;
- e) displaced populations;
- f) persons dependent on natural resources; and
- g) other affected groups.

9.14 Land and Site Selection

Where a programme involves the establishment, rehabilitation or use of physical sites, the responsible team shall consider:

- a) lawful access to the site;
- b) environmental sensitivity;
- c) community use;
- d) drainage;
- e) water resources;
- f) waste management;
- g) safety; and
- h) potential environmental impacts.

No ILA-SS programme shall knowingly use land in violation of applicable law or contractual requirements.

9.15 Water Resources



Programmes involving significant water use or activities near water resources shall take reasonable measures to:

- a) prevent contamination;
- b) avoid unnecessary depletion;
- c) protect community access where relevant;
- d) manage wastewater responsibly; and
- e) comply with applicable requirements.

9.16 Biodiversity and Natural Resources

Programme activities shall avoid unnecessary damage to:

- a) forests;
- b) wetlands;
- c) wildlife;
- d) vegetation;
- e) water bodies;
- f) habitats; and
- g) other environmentally sensitive resources.

Where significant risks are identified, appropriate specialist advice shall be obtained.

9.17 Livelihoods and Natural Resources

Where programmes affect communities whose livelihoods depend on land, forests, water, livestock, fisheries or other natural resources, environmental and livelihood impacts shall be considered together.

Programme teams shall seek to avoid creating unnecessary competition, depletion or environmental degradation.

9.18 Construction and Rehabilitation Projects



Where ILA-SS undertakes or supports construction, rehabilitation or infrastructure-related activities, the responsible team shall ensure that appropriate environmental safeguards are incorporated.

These may include:

- a) site assessment;
- b) waste management;
- c) dust control;
- d) noise management;
- e) worker and community safety;
- f) material sourcing;
- g) water management;
- h) protection of surrounding land; and
- i) restoration of disturbed areas where appropriate.

9.19 Contractor Compliance in Projects

Project contractors shall comply with environmental requirements incorporated into their contracts.

Project managers shall monitor compliance where environmental risks are material.

Serious non-compliance shall be escalated in accordance with contractual and institutional procedures.

9.20 Livelihood and Economic Programmes

Where ILA-SS implements or supports livelihood activities, environmental sustainability shall be considered where relevant.

Projects should avoid encouraging practices that unnecessarily:

- a) degrade land;
- b) pollute water;
- c) destroy natural resources;



- d) create excessive waste; or
- e) increase environmental vulnerability.

Where appropriate, projects may promote environmentally sustainable livelihood practices.

9.21 Climate-Resilient Programming

Where climate risks are relevant, programme design shall consider:

- a) climate vulnerability;
- b) extreme weather;
- c) flooding;
- d) drought;
- e) heat;
- f) water availability;
- g) infrastructure resilience; and
- h) continuity of services.

9.22 Environmental Considerations in Research

Research undertaken by ILA-SS that concerns environmental issues shall, where appropriate, consider:

- a) environmental impacts;
- b) community concerns;
- c) ethical considerations;
- d) data protection;
- e) informed participation; and
- f) responsible dissemination of findings.

Research shall not expose communities or ecosystems to unnecessary environmental harm.

9.23 Environmental Advocacy



Where consistent with its mandate and applicable law, ILA-SS may undertake environmental advocacy concerning:

- a) environmental rights;
- b) access to justice;
- c) community participation;
- d) lawful natural-resource governance;
- e) environmental accountability; and
- f) protection of vulnerable communities.

Advocacy shall remain evidence-based, lawful and consistent with ILA-SS's institutional mandate.

9.24 Environmental Complaints in Programmes

Programme participants and affected communities shall have appropriate channels for raising environmental concerns.

Complaints may concern:

- a) pollution;
- b) waste;
- c) environmental damage;
- d) unsafe project practices;
- e) community impacts;
- f) failure to implement agreed safeguards; or
- g) other environmental concerns.

Complaints shall be handled in accordance with ILA-SS's applicable complaints and accountability procedures.

9.25 Environmental Incident Reporting

Programme teams shall promptly report significant environmental incidents in accordance with this Policy.



The report should, where available, identify:

- a) date and location;
- b) activity involved;
- c) nature of the incident;
- d) persons or communities affected;
- e) immediate action taken;
- f) potential environmental impact; and
- g) proposed corrective action.

9.26 Environmental Monitoring

Environmental safeguards shall be incorporated into project monitoring where relevant.

Monitoring may include:

- a) site inspections;
- b) compliance checks;
- c) community feedback;
- d) waste records;
- e) environmental indicators;
- f) contractor reports; and
- g) incident monitoring.

9.27 Environmental Indicators

Where relevant, projects may monitor indicators such as:

- a) waste generated and properly disposed of;
- b) water consumption;
- c) energy consumption;



- d) environmental incidents;
- e) environmental complaints;
- f) mitigation measures completed;
- g) affected sites restored; and
- h) community environmental awareness.

Indicators shall be selected according to the project's nature and risk.

9.28 Environmental Reporting

Project reports shall include environmental information where relevant to the project's risks, donor requirements or agreed indicators.

Reports may identify:

- a) environmental risks;
- b) mitigation measures;
- c) incidents;
- d) complaints;
- e) compliance status;
- f) corrective action; and
- g) lessons learned.

9.29 Donor Environmental Requirements

Where donor agreements impose environmental or social safeguards, programme teams shall incorporate those requirements into:

- a) project design;
- b) implementation plans;
- c) procurement;
- d) monitoring;



- e) reporting; and
- f) close-out.

9.30 Partner Implementation

Where a project is implemented through a partner, the relevant environmental requirements shall be incorporated into the partnership agreement, project document or implementation plan where appropriate.

ILA-SS may conduct reasonable environmental due diligence and monitoring based on the level of risk.

9.31 Environmental Safeguards in Project Close-Out

Before project closure, the responsible programme team shall, where relevant:

- a) confirm completion of environmental mitigation measures;
- b) address outstanding environmental incidents;
- c) ensure appropriate disposal of project waste;
- d) restore temporary sites where required;
- e) document environmental lessons learned; and
- f) retain relevant environmental records.

9.32 Do-No-Harm Principle

ILA-SS shall seek to ensure that its programmes do not unintentionally create environmental harm that undermines community wellbeing or the objectives of the intervention.

Where significant unintended environmental impacts emerge, the responsible programme team shall reassess the activity and take appropriate corrective measures.

9.33 Environmental Safeguard Non-Compliance

Where a programme fails to comply with applicable environmental safeguards, management may require:

- a) corrective action;
- b) additional monitoring;



- c) revision of project procedures;
- d) retraining;
- e) suspension of an activity;
- f) contractor or partner corrective measures; or
- g) other appropriate action.

9.34 Capacity Building

ILA-SS shall promote appropriate environmental capacity among programme personnel through:

- a) orientation;
- b) training;
- c) technical guidance;
- d) environmental checklists;
- e) lessons learned; and
- f) access to specialist advice where required.

9.35 Programme Accountability

Programme managers shall remain accountable for environmental safeguards within their areas of responsibility.

Environmental responsibility shall be incorporated into programme management rather than delegated entirely to an Environmental Focal Person.

9.36 Continuous Improvement

ILA-SS shall use project monitoring, evaluation, community feedback, environmental incidents and lessons learned to improve future environmental safeguards.

Environmental safeguards shall be reviewed periodically to ensure that they remain practical, proportionate and effective.

