



Environmental Policy Template



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DECEMBER 2024

This template has been prepared by the Secretariat of the International RBC Agreement for the Renewable Energy Sector, based on input from the parties to the Agreement. The views expressed in the document may not reflect those of all the parties.

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Introduction

Why this tool?

Parties to the [International RBC Agreement for the Renewable Energy Sector](#) have committed to prevent and address severe actual and potential adverse impacts to the natural environment and biodiversity in the renewable energy value chains. The goal of this tool is to make it easier for companies to develop an environmental policy based on the [UN Guiding Principles on Business and Human Rights](#) and the [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#) and other international guidelines.

How does it work?

- The proposed text below can be used as a template for your company's environmental policy if you do not have a policy, or it can be used to revise your policy if you already have a policy.
- Read the text carefully and replace the text in brackets with your company name. You are expected to amend, remove, or add text in order to better suit your company's context.
- The policy must be signed by a person with oversight and responsibility for sustainability, preferably the CEO or owner/director of the company.
- You can combine this environmental policy with other sustainability or corporate policies (e.g., policies on human rights, bribery and corruption, etc.).
- You are expected to publish your environmental policy and update it regularly. You are, therefore, advised to date or label your policy document, e.g., Environmental Policy of Company 1.0 – Date of Adoption.
- You are advised to 'translate' your environmental policy into a code of conduct for your suppliers or business relations. Your company (your CEO) and the CEOs of your suppliers must sign and return the code of conduct.

What is it?

The policy template consists of the following elements:

1. Our Mission Statement
2. Our commitment
3. Our approach for implementing our environmental policy
4. Scope
5. Our salient environmental risks
6. Rule of law and conflicting requirements
7. Approval and oversight

Suggestions for improvement? Please contact the Secretariat at REASecretariat@ser.nl

Environmental Policy Template

1 Our Mission Statement

[The company] recognises that our business activities and value chain may have an impact on society, the environment and biodiversity. We strive to avoid causing or contributing to adverse environmental impacts through our own activities and address such impacts when they occur. We also seek to prevent or mitigate adverse environmental impacts that are directly linked to our operations, products or services by our business relationships, even if they have not contributed to those impacts.

2 Our commitment

[The company] conducts our activities in a manner that takes due account of the need to protect the environment, workers, communities and society more broadly, avoids and addresses adverse environmental impacts, and contributes to the wider goal of sustainable development. Our actual impacts to be addressed include¹:

- climate change;
- biodiversity loss;
- degradation² of land, marine and freshwater ecosystems;
- deforestation;
- air, water and soil pollution; and
- mismanagement of waste, including hazardous substances and contribution to a circular economy.

The abovementioned impacts are aligned with international guidelines, in particular the environmental chapter of the [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#) and the principles and objectives contained in the [Rio Declaration on Environment and Development](#), the [United Nations 2030 Agenda for Sustainable Development](#), the [UN Framework Convention on Climate Change](#), the [2015 Paris Agreement and its first global stocktake](#), the [UN Convention on Biological Diversity](#), the [Kunming-Montreal Global Biodiversity Framework](#) and the [UN Convention to Combat Desertification](#).

1 Companies can select the impacts that apply to them based on the risks and impact analysis they have conducted.

2 Degradation refers to both direct and indirect degradation of land, marine and freshwater ecosystems. An example of indirect degradation is abiotic change as a result of offshore wind that can alter mixing in the water column. This can lead to destratification affecting primary production by phytoplankton. These planktonic shifts can have bottom-up effects that alter complete food systems.

3 Our approach for implementing our environmental policy

When conducting business, we strive to implement this environmental policy by adhering to the six steps of environmental due diligence as described in the [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#) [Refer also to international / national legislation on corporate sustainability due diligence if applicable] More in particular, we:

1. establish and maintain a system of environmental management appropriate to our operations, products and services over their full life cycle;
2. identify and assess adverse environmental impacts associated with our operations, products or services including through collection and evaluation of adequate and timely information regarding the adverse impacts associated with our operations, products and services and where activities may have significant adverse environmental impacts, prepare an appropriate environmental impact assessment;
3. establish and implement measurable objectives, targets and strategies for addressing adverse environmental impacts associated with our operations, products and services and for improving environmental performance. The targets are science-based, consistent with relevant national policies and international commitments, goals, and informed by best practice;
4. regularly verify the effectiveness of strategies and monitoring progress toward environmental objectives and targets, and periodically reviewing the continued relevance of objectives, targets and strategies;
5. provide adequate instruction and training to workers on environmental, health and safety matters, including on the management of hazardous and non-hazardous materials and waste as well as the prevention of environmental accidents, as well as in more general environmental management areas, such as environmental impact assessment procedures, public relations, and environmental technologies;
6. seek contractual assurances of suppliers and other business partners aimed at shared responsibility for care of the environment;

7. provide support, including capacity building on environmental management, to suppliers and other business relationships, particularly small and medium-sized enterprises, where appropriate and feasible;
8. contribute to the development of environmentally responsible and economically efficient public policy, for example, by means of partnerships or initiatives that will enhance environmental awareness and protection;
9. provide the public, workers, and other relevant stakeholders with adequate, measurable, verifiable (where applicable) and timely information on environmental impacts associated with our operations, products and services based on best available information, and progress against targets and objectives;
10. take human health and safety into account, consistent with the scientific and technical understanding of the risks, where there are threats of serious or irreversible damage to the environment, and we will not use the lack of full scientific certainty or pathways as a reason for postponing cost-effective measures to prevent or minimise such damage;
11. maintain contingency plans for preventing, mitigating, and controlling serious environmental and health damage from our operations, including accidents and emergencies; and mechanisms for immediate reporting to the competent authorities;
12. communicate how adverse impacts are addressed.

This is an ongoing process, as we recognise that the environmental risks may change over time as our business operations and operating context evolve.

We integrate this policy throughout the company and our value chain, involving different functions and departments. [\[Refer to the relevant departments/functions and how this policy is implemented throughout your organisation\]](#)

Stakeholder engagement and remediation:

[\[Company name\]](#) recognises that risks relating to the environment require meaningful engagement with internal and external stakeholders. To that end, we draw on internal and/or independent external environmental and human rights expertise and involve meaningful consultation with potentially affected groups (i.e.

indigenous people) and individuals, or their legitimate representatives, and other relevant stakeholders.

In cases where we cause or may cause an adverse impact on the environment, we will take the necessary steps to cease or prevent the impact. Where we contribute or may contribute to such an impact, we will take the necessary steps to cease or prevent our contribution and use our leverage to mitigate any remaining impact to the greatest extent possible. Leverage is considered to exist where we have the ability to effect change in the practices of a business relation that cause adverse impacts. When we cause or contribute to an adverse impact on the environment we will remedy or co-operate in the remediation of the situation through legitimate processes. [Company name] has the following channels through which rightsholders can raise concerns: [Refer to your grievance mechanism or the grievance mechanism of the initiative(s) you are part of] In situations where we are directly linked to adverse human rights and environmental impacts because of activities in our value chain, we seek to use and increase our leverage to prevent or mitigate those impacts.

Transparency and leverage:

While going through the process of doing due diligence, we realise that we can only know about our impacts and show what we do to address those impacts if we have visibility of our supply chain. We therefore commit to increase supply chain transparency. [Refer to transparency initiatives you are part of, such as Open Supply Hub or disclosing supply chain information through your website]

We collaborate with suppliers and other organisations to increase our leverage to address and mitigate possible adverse impacts. [Refer to multi-stakeholder, industry initiatives and civil society organisations if applicable, e.g., the International RBC Agreement for the Renewable Energy Sector, the International Union for Conservation of Nature (IUCN), The Initiative for Responsible Mining Assurance (IRMA), the World Wildlife Fund, IBAT, The Taskforce on Nature-related Financial Disclosures (TNFD), the North Sea Foundation and others]

Disengagement is a last resort for us if a supplier or business partner refuses to prevent impacts after a notice and warning process. Even in these cases, we commit to responsible disengagement.

4 Scope

Our commitment applies to all rightsholders, which include but are not limited to all our employees, employees of our suppliers and contractors across our supply chains, customers, environmental and human rights defenders, local communities and indigenous peoples along our value chain.

This commitment also applies to all the entities and subsidiaries of [Company name]

[Company name] expects all of our customers, suppliers and their respective supply chains, and other business partners to uphold the commitments set out in this policy. Our principles, including compliance with this policy, are included in contracts and our code of conduct for suppliers and business partners. Through this policy and our code of conduct, we are committed to work with our business partners to implement the OECD Guidelines for Multinational Enterprises, to promote supply chain transparency, and to establish long-term sustainable relationships.

[Include a link to your Supplier /Business Partner Code of Conduct and/or Responsible Procurement Policy if applicable]

5 Our salient environmental risks

[Once the risk identification is finished, you need to include a summary of those environmental risks that your company recognises as likely to be the most salient for its operations and value chains and information on how it will account for its actions to meet its responsibility to respect the environment]

We periodically identify and assess the impact of our operations on people and the planet and prioritise addressing the most salient risks based on likelihood and severity³.

The following are the key environmental risks that we have identified: [Please add or remove risks where applicable and add the actions that you will take to address them]

³ For more information on how to state and determine the most likely and severe risks, please check page 48 of the UN Guiding Principles Reporting Framework with implementation guidance

Climate change: companies have an important role in contributing towards net-zero greenhouse gas emissions and a climate-resilient economy, necessary for achieving internationally agreed goals on climate change mitigation and adaptation. This includes the introduction and implementation of science-based policies, strategies and transition plans on climate change mitigation and adaptation as well as adopting, implementing, monitoring and reporting on short, medium and long-term mitigation targets. These targets must be science-based, include absolute and also, where relevant, intensity-based GHG reduction targets and take into account scope 1, 2, and, to the extent possible based on best available information, scope 3 GHG emissions. Enterprises must ensure that their greenhouse gas emissions and impact on carbon sinks are consistent with internationally agreed global temperature goals based on best available science, including as assessed by the Intergovernmental Panel on Climate Change (IPCC).

Biodiversity loss: the conservation of biological diversity and sustainable management and use of natural resources and ecosystems, including, for example, forests, oceans, peatlands and wetlands, is highly important to human health and livelihoods, species survival as well as mitigation of and adaptation to climate change. Companies must contribute to the conservation of biological diversity. Enterprises' efforts to prevent or mitigate adverse impacts on biodiversity must be guided by the biodiversity mitigation hierarchy, which recommends first seeking to avoid damage to biodiversity, reducing or minimising it where avoidance is not possible, and using offsets and restoration as a last resort for adverse impacts that cannot be avoided.

[An increasing number of companies commit on policy level to become net positive on biodiversity. Examples can be found here: [siemens-gamesa-biodiversity-commitment-2022-en.pdf](#) (siemensgamesa.com) and here: [eneco_biodiversity_ambition_executive_summary_v2.pdf](#)]

Degradation of land, marine and freshwater ecosystems and deforestation: companies must avoid and address land, marine and freshwater degradation, including deforestation, hazardous discharges, and causing abiotic changes driving ecosystem alterations. Following the mitigation hierarchy, unavoidable effects must be minimised and impact compensated. Where appropriate, and according to their own capacities and domestic laws where they operate, enterprises must also contribute to sustainable land and forest management, including restoration, afforestation, reforestation including reduction of land, marine and freshwater degradation.

Air, water and soil pollution: companies must work towards air, water and soil pollution reductions to levels no longer considered harmful to health and natural ecosystems and that respect the boundaries our planet can cope with, thus creating a toxic-free environment.

Mismanagement of waste, including hazardous substances: in order to optimise use of resources, to contribute to a circular economy, and to minimise waste, and in particular hazardous waste, companies are expected to adopt best available technologies to improve the environmental performance of their products or services. Products and services will then have no undue environmental impacts, be safe in their intended use, durable, repairable and can be reused, recycled, or disposed of safely and will be produced in an environmentally sound manner that uses natural resources sustainably, while minimising possible energy and material usage as well as pollution, greenhouse gas emissions and waste as much as possible.

6 Rule of law and conflicting requirements

In all situations and contexts, and in all jurisdictions wherever we operate, [company name] will comply with applicable laws and respect internationally recognised environmental standards.

In cases where local law and international environmental standards differ, we strive to follow the higher standards while complying with local laws. In case of direct conflict between the two, we will seek ways to honour the principles of internationally recognised environmental standards.

We will treat the risk of causing or contributing to adverse environmental impacts as a legal compliance issue wherever we operate.

7 Approval and oversight

This policy has been endorsed by the board of [company name] and will be overseen at board level by [name of person responsible for environmental policy].

[Company name] will report, in our annual [sustainability / CSR / ...] report, on the progress of the implementation of this policy. The policy will be reviewed periodically to ensure that it continues to meet observed impacts and revised or additional international guidelines and legislative developments.

Colophon

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Photography

Cover: Shutterstock/Kenneth Bagge Jorgensen

Design and printing

2D3D, The Hague (concept)

SER Graphic Design

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