



The National Trust
for Scotland

ENVIRONMENTAL POLICY

November 2004

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Approved by NTS Board 25 November 2004

Introduction

This Policy sets out the Trust's approach to the protection of the environment¹. The Policy commits the Trust to managing its activities in such a way that any resulting negative environmental impacts are minimised and to delivering environmental benefits without jeopardising its other purposes. The principles and policy aims set out below establish the key aspects of the Trust's commitment to the environment. A brief explanation of each is given.

As a conservation organisation, part of the Trust's core purpose is to promote and protect the natural environment, especially through the management of its properties. However, in delivering its core purpose the Trust, like any organisation, has an unintentional impact on the environment through its operations and activities. Whilst the delivery of the conservation purpose that is part of the Trust's programme of work is directly linked to environmental impact, the primary focus of this policy is to minimise the negative impact of its activities.

Environmental Principles

- **The Trust's commitment to protecting the environment benefits and supports its work as a conservation organisation**
- **The Trust should consider environmental factors in all aspects of its activities**
- **The Trust's environmental responsibilities reach beyond the boundaries of its own properties**

All businesses and property owners have, as a minimum, the duty to comply with environmental legislation, but the Trust's position as a conservation and education charity with membership support brings a higher level of expectation of environmental good practice. Conservation of the natural and cultural heritage is one of the Trust's statutory purposes, as first set out in its Acts of Parliament² and more recently interpreted in its Conservation Principles³. The conservation work of the Trust is inextricably linked with the protection of the wider natural environment, both because the maintenance of essential ecological processes is fundamental to the survival of humankind and because the state of the environment can impact, in many different ways, on the natural and cultural heritage which the Trust seeks to protect.

Environmental good practice should be integrated into all aspects of the Trust's work including its administration and support services as well as the implementation of its statutory purposes of conservation, access, enjoyment and education. Consideration of potential environmental impacts should be incorporated as appropriate into all policies, plans and guidance. The Trust aims to develop a culture, through the provision of information, training and support, where all of the staff, volunteers and Members of the governance believe that environmental issues are relevant to their work and are able to make informed decisions about them.

As well as reducing the negative environmental impact of its own activities, the Trust is committed to the protection of the wider environment. Protection of the Trust's properties through ownership can not control the

¹ The term environment is used here to mean the physical, natural world, or aspects of it - rather than, for example, social, cultural, financial or spiritual environments. Natural resources and ecological systems are regarded as part of the environment.

² The National Trust for Scotland Order Confirmation Acts (1935 and 1938)

³ The National Trust for Scotland Conservation Principles (2003)

external environmental influences acting on them, some of which are national or worldwide problems. Therefore, the Trust's environmental responsibilities must extend to global issues, even though its contribution to addressing these will be through local and national activities or by promoting better environmental practice elsewhere.

Policy Aims

The following aims set out in broad terms how the Trust intends to realise its commitment to the environment. They are not set out in any particular order.

AIM 1

To demonstrate best practice in environmental management by complying with all relevant legislation and striving to exceed required standards wherever possible.

The Trust must ensure that all of its activities comply with current environmental legislative requirements. It is recognised that there are many areas of activity where legal standards do not apply or where they define only the minimum requirement. In the absence of legislation, the Trust will consider and if appropriate adopt best practice and standards set by external organisations as well as generating and reviewing its own performance targets. Environmental legislation and government targets are expected to continue to be developed in the foreseeable future and the Trust should be able to anticipate these developments.

AIM 2

To eliminate or minimise the negative environmental impact of the Trust's operations, by reducing its overall level of resource consumption and by shifting towards the use of more sustainable resources.

The current global pattern of consumption of natural resources is having many negative impacts upon the environment. The rising demand for goods and materials requires ever-increasing levels of energy to be used in production and transport. The generation of waste material both during production and consumption is evidence that natural, and often non-renewable, resources are not being used efficiently. This creates associated problems of waste disposal and pollution control.

The Trust will improve its understanding of its resource use through better monitoring, and will strive to reduce unnecessary consumption of resources and to minimise avoidable waste and pollution. When making procurement decisions the Trust will consider environmental impacts and seek to secure the use of materials, products and services with strong environmental credentials. It should be demonstrable that: use of resources has undergone scrutiny in terms of fulfilling a real need; alternatives have been examined in order to find options that are more environmentally benign; waste is minimised; re-use and recycling opportunities have been explored and that the option adopted is as sustainable as possible⁴. This approach will be built in to the management of projects and regular activities that the Trust undertakes.

AIM 3

To promote practices and developments that both deliver environmental benefits and safeguard Scotland's natural and cultural heritage.

The Trust supports practices that enable and promote protection of the environment, and this commitment is

⁴ The use of 'lifecycle analysis' may be appropriate to achieve this objective. This requires a holistic evaluation of the total impact, over time, of the production and delivery of goods and services upon the environment.

encompassed within the Trust's wider conservation remit which aims to safeguard Scotland's heritage for the long term. However, there may be instances where conservation and environmental aims conflict with each other to some degree. In such cases the intended positive environmental impacts of new developments must be evaluated within a wider context to ensure that the development is sustainable⁵. The Trust will promote, both at its own properties and more widely, an approach of finding environmental solutions that avoid eroding the significance of Scotland's natural and cultural heritage.

The Trust will be guided in such circumstances by its Conservation Principles which require a systematic approach to evaluation of significance and that 'any action should have as little adverse impact on significant features as possible'⁶. In terms of improving the Trust's own environmental performance, this may well require novel thinking and new solutions to problem-solving that meld traditional approaches and materials with new technology. When considering developments proposed for areas outwith its ownership, the Trust will try to ensure that an evaluation of potential impacts (both positive and negative) on Scotland's natural and cultural heritage is incorporated within the decision-making process.

A key target will be to reduce the Trust's direct contribution to the emission of greenhouse gases⁷ (GHG) and as such its contribution to human-induced climate change. The predicted changes in Scottish climate have implications for the Trust in its roles both of property owner and of conservation body. Its buildings, gardens and natural heritage are all likely to be affected to some degree. It is anticipated that structural damage to property will increase due to greater incidence of severe storms, flooding will have an impact upon habitats located in vulnerable areas, distinctive landscapes will undergo ecological change and key mountain species will be threatened by temperatures rising at a rate faster than species and habitats can adjust⁸. It is therefore in the long term interest of the Trust, and in line with its statutory purposes, to reduce the level of GHG emissions from its own operations and to encourage others to do likewise. However, the Trust must also begin to plan mitigation of and adaptation to the effects of GHGs as well as auditing and reducing its own production of them. The initial means of reducing the Trust's GHG emissions will be to minimise its consumption of energy from non-renewable sources, although additional actions will be evaluated including the impacts of forestry and other land use changes.

AIM 4

To ensure continual assessment, transparent reporting and regular review of the Trust's environmental performance.

Continual improvement in environmental performance will be sought, and monitoring, assessment and feedback will assist in achieving this. A programme of environmental audits of properties and offices will be carried out, to assess current practice and give recommendations for the future. Recording of resource use must become routine. Transparent environmental reporting will be undertaken at regular intervals, in order to demonstrate the Trust's environmental commitment to both internal and external audiences including staff, volunteers, governance, members, other organisations and institutions and the wider public. This Trustwide monitoring and reporting will

⁵ Sustainable development is a concept in which the environment plays a key part. It is usually taken to encompass not only environmental issues, but also how these relate to the well-being of society and economic development. The most common definition of sustainable development is that of the Brundtland Commission: "Development that meets the needs of the present without compromising the ability of future generations to meet their own needs" (Brundtland Commission (1987) Our Common Future: the Report of the World Commission on Environment and Development Oxford University Press). A further definition refers to "living on the earth's income rather than eroding its capital" (HMSO (1990) This Common Inheritance. Britain's Environmental Strategy, Cm 1200).

⁶ Principle 9 of the Conservation Principles (2003).

⁷ These are gases which when released into the atmosphere, contribute to atmospheric warming and the disruption of climate systems, they include: CO₂, NO_x, NO₂ and CH₄.

⁸ Kerr, A, Shackley S, Milne R, Allen S, (1999) Climate Change Scottish Implications: Scoping Study Central Research Unit, Scottish Executive, Edinburgh (<http://www.scotland.gov.uk/cru/kd01/ccsi-08.htm> 26/03/03) and climate change scenarios published by the UK Climate Impact Programme in April 2002.

be coordinated by the Health, Safety and Environment Advisers. Line managers should consider how individual members of staff can help implement this policy and encourage and monitor this via the performance review system. These steps, along with training for staff and volunteers, will contribute to the change in culture within the organisation which will be necessary to make significant improvements to the Trust's environmental performance.

In striving for continuous improvement in environmental performance, the Trust will regularly monitor and review the effectiveness of its Environmental Policy and associated management practices.

AIM 5

To promote good environmental practice outwith the Trust's own operations.

The Trust will attempt to have an indirect influence on environmental issues by having a positive influence on the behaviour of other people. It will communicate its own policy and demonstrate environmental good practice at its properties and in its other activities, including its education programme. The intention will be to increase awareness of environmental issues and solutions and to influence both the behaviour of individuals and policy at different levels of government through greater engagement in the global, national and local environmental agendas.

The Trust also has a responsibility to ensure that activities undertaken on its behalf are carried out in accordance with environmental good practice. This will require assessment of the environmental impact of goods and services procured and engagement with suppliers to review their environmental performance.

Responsibilities

Clear lines of responsibility and accountability for environmental performance are required. These are outlined below:

- The NTS Board is responsible for the overall environmental performance of the Trust
- The Director of Conservation & Property Services is responsible for giving an annual environmental report to the Board and for reporting other issues when necessary
- The Senior Health, Safety and Environment (HSE) Adviser reports to the Senior Management Team every three months on health, safety and environmental issues. The Senior HSE Adviser is also responsible for the programme of environmental audits. The HSE Advisers are responsible for the provision of advice and information on environmental issues to other staff, for monitoring progress with the annual implementation plans and for drafting an annual environmental report
- The Health, Safety and Environment Committee meets at least 3 times a year and is tasked with advising on future areas of focus, monitoring current compliance and communicating with staff via representatives
- Head Office Specialists/Advisers are responsible for ensuring this policy is adhered to in their specialist areas and that operational policies and guidance consider environmental good practice
- Regional Directors/Divisional Directors have the overall management responsibility for ensuring that this policy is implemented within their Region/Division, including availability of resources and that staff receive adequate training/development to fulfill their roles
- Regional Conservation Managers and other staff who specify or manage projects should ensure all projects comply with internal policy
- Property Managers have overall responsibility for ensuring that this policy is implemented at their property
- All Line Managers are responsible for ensuring that their staff are aware of this policy and how it affects their work and encouraging and monitoring related activity via the performance review system