



# Environmental Policy

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## 1. APPLICATION

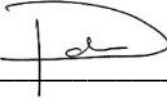
This policy applies to all paid, contracted and volunteering staff of the Sucon Consultancy Ltd (from here on referred to as 'Sucon'. This policy also applies to all Sucon associates, subcontractors and freelancers. This policy also extends to all business extensions of Sucon.

## 2 EFFECTIVE DATE: 28/03/2022

The Anti-Corruption Policy applies to all Sucon relevant operations from the effective date stipulated above. From the date stipulated above all previous Anti-Corruption Policy and practices are repealed.

## 3 POLICY IMPLEMENTATION, APPROVAL, MONITOR AND REVIEW

The Central Administration and the responsible officer(s) of Sucon via the authority of the President, Vice President and Operations Manager are liable for the management and implementation of the Anti-Corruption Policy and ensuring that its provisions and records management are applied and adhered to. This includes the establishment of relevant record-keeping systems.

APPROVAL AND REVIEW	DETAILS
Policy Author	Eric Clem Groves, Vice President
Council Approval	 Lefaotogi Paletasala Faolotoi President
Next Review Date	March 2025

## 4 PURPOSE AND DEFINITION

Sucon believes that it is in the best interests of its employees, subcontractors, suppliers, service providers, visitors to sites, clients, and the general public that it exercises control over its environmental aspects and impacts. Sucon is committed to:

- a) Understanding and meeting in full the standards imposed through environmental legislation by establishing an Environmental Management System accredited internationally and published on the website.
- b) Reviewing, annually, the Environmental Management System including the policies, objectives and targets at President Council Meetings to achieve measured continual improvement
- c) Working within the framework of environmental procedures and the setting of policies, objectives and targets, which will be documented, implemented and available to all interested parties including the public.

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- d) Preventing pollution by the identification of environmental risks and setting environmental performance standards commensurate with best practice.
- e) Advise and encourage clients, designers, sub-contractors and suppliers to ensure that sound environmental performance and criteria are taken into account in the design, selection and construction of new sites and the demolition of old.
- f) Communication of Sucon's commitment to the reduction of its environmental impacts is illustrated within its policies by the provision of instruction and training at all levels within the company to encourage, motivate and implement Environmental Best Practices.

## 5 LEGISLATIVE FRAMEWORK

This policy is guided by the following legislations:

- a) [Lands, Surveys and Environment Act 1989](#)
- b) [Labor and Employment Relations Act 2013](#)
- c) [Waste Management Act 2010](#)
- d) [Spatial Information Agency Act 2010](#)
- e) [National Parks and Reserves Act 1974](#)
- f) [Planning and Urban Management Act 2004](#)
- g) [Water Resources Management Act 2008](#)
- h) [Forestry Management Act 2011](#)
- i) [Marine Pollution Prevention Act 2008](#)
- j) [National Building Code of Samoa 2017](#)

For non-compliance with this policy conducted or found outside of the scope and location of Samoa, the equivalent legislation of the respective host nation shall be adopted if the suspect cannot be brought back to the headquarters in Samoa.

## 6 SUCON ENVIRONMENTAL PRINCIPLES

The Sucon recognises that the Environmental Policy serves both the public good, in line with the Council's commitment to social responsibility, and the Sucon interests in maximising the potential impact of our services. Sucon's Environmental are as follows:



### Transparency

As a company, we are mandated to be transparent and non-biased with our decisions and the administration of our funding, assets, and human resources.



### Accountability

We must hold ourselves accountable for our actions. In the same respect, we hold our partners and stakeholders accountable for ensuring that we all reflect the values of our organisation and our donors.

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## Sustainability

We must ensure that our project delivery methods are sustainable. That we are planning ahead in preparing for the future and any potential setbacks. We are to adhere to international standards and values of sustainable construction.

## 7 ENVIRONMENTAL STANDARDS

Sucon will take a proactive and responsible approach to all environmental issues. Sucon is committed to achieving high operational and environmental management standards on behalf of its clients. To achieve the necessary high standards of environmental awareness, the following steps will be taken:

- a) Although Sucon headquarters are in Samoa, our environmental, project management, design and construction standards are bench marked to that of New Zealand.
- b) Sucon will encourage greater awareness and understanding and effective management of environmental issues by staff training and example.
- c) Sucon will work to enhance the quality of the environment by encouraging its employees to use current knowledge and experience to anticipate environmental problems that could arise from their professional activities.
- d) Sucon will promote training and continuing professional development of its employees in the environmental field to improve their knowledge and understanding of environmental matters and increase their awareness of their role in enhancing their environment.
- e) Sucon will take the initiative although it may not be required by the legislations of the respective host nation where the project is based; Sucon will ensure in collaboration with the client that additional measures such as archaeological and biodiversity surveys are conducted for large-scale projects with considerable environmental impacts.

Non-compliance with the Policy may result in criminal or civil penalties which will vary according to the offence. An employee acting in contravention of the Policy will also face disciplinary action up to and including summary dismissal.

## 8 WASTE MANAGEMENT PROCESSES AND PROCEDURES

Sucon will adhere to the standards of the [Samoa Waste Management Association](#) (SRWMA) in implementing the following practices:

### a) **Mandatory to Review all Materials**

Sucon will review the way in which materials are designed, procured and supplied so that the amount of waste generated on construction sites can be minimised, where possible.

### b) **Re-use, Recycle and Recovery**

Where practicable, consideration will be given to material re-use, recycling or recovery before disposal options are explored.

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**c) Mandatory Recycling Facilities**

All Sucon facilities must be made available for waste sorting and recycling within company offices and on construction sites. These facilities must be categorised as per SRWMA guidance – Plastic, Aluminum, Glass, Oil, Electronic and General Waste. The storage, delivery and disposal are to be negotiated with SRWMA on a case-by-case basis.

**d) Projects Outside of Samoa**

For projects outside of Samoa where a state-funded or non-government waste organisation is available, Sucon shall engage the organisation in pursuit of establishing a partnership. Where a recycling association or recycling methods are not available or a partnership is not possible, Sucon shall comply with local and legislative practices.

**e) Hazardous Waste**

Hazardous waste such as chemicals, flammable materials, gas and liquids must be stored and disposed of with care in alignment with national legislation and protocol. In the scenario where legislation and protocols are absent, Sucon shall seek appropriate storage and arrange export for proper handling and disposal if possible. Sucon will follow local practice if the exportation is not feasible.

## **9 PREVENTIVE AND CONTROL MEASURES**

Sucon will be required to develop, implement, monitor and maintain a system of internal controls to facilitate compliance with this Policy, as well as to foster a culture of integrity and maintain high ethical standards throughout the Company. This includes but is not limited to the following:

### **9.1 Sustainable Use of Resources**

Sucon will maximise the use of local and sustainable materials, where possible:

- a) Consideration will be given to the life span of all construction materials, used, new and recycled and the ease with which they could be disposed of or used again once the structure reaches the end of its life.
- b) The company will work towards improving material resource efficiency, by promoting the economic use of construction materials and methods so that waste is minimised.
- c) The company will encourage the sustainable use and management of water resources through incorporation of water efficiency measures and the use of sustainable urban drainage systems, where appropriate.

### **9.2 Energy Conservation**

Sucon must ensure that all possible efforts in collaboration with the client are taken to ensure energy conservation:

- a) The company will where possible encourage the use of sustainable energy resources and seek opportunities to improve energy efficiency.
- b) All Sucon buildings must be designed with the possibility to include solar panels, battery storage or alternative renewable energy methods in collaboration with the client.
- c) Where possible, Sucon in its administration and operation shall maximise the use of renewable energy sources.

### 9.3 Environmental Compliance

The overall objective of the Environmental Policy is to promote a company culture which actively commits resources to the management of environmental issues at a corporate and individual level and demonstrates a high standard of commitment to the environment and environmental issues:

- a) Sucon must comply with their statutory and environmental obligations and in all instances will act professionally and diligently. This includes but is limited to:
  - i. Environmental Impact Assessment (EIA)
  - ii. Preliminary Environmental Assessment Reports (PEAR)
  - iii. Fire Safety Standards
  - iv. Building Code Standards
  - v. Geotechnical Surveys – Earth and Marine
  - vi. Topography Surveys – Earth and Marine
  - vii. Archaeological Survey – Earth and Marine
  - viii. Biodiversity Survey – Earth and Marine
- b) Sucon must ensure, where practicable, that business partners and sub-contractors have appropriate environmental policies and take steps to implement them.
- c) In scenarios where local legislation may not provide a framework to enable Sucon to practice its environmental policies, Sucon shall heavily encourage its client to enable Sucon to take the initiative. Environmental initiatives outside of legislative scope shall be taken if the project is:
  - i. 10 or more acres in land size
  - ii. Environmental impact of the type of support is deemed high-risk by the President's Council.

### 9.4 Non-compliance

Failure to comply with this Policy may result in severe consequences, which could include internal disciplinary action or termination of employment or consulting arrangements without notice in alignment with the Misconduct Process and Procedures' in the Human Resources Policy. Violation of this Policy may also constitute a criminal offence under Samoan, American Samoa, and New Zealand laws depending on where the project is stationed. If it appears in the opinion of the President's Council that any director, officer, employee, consultant or contractor of Sucon may have violated such laws, then Sucon may refer the matter to the appropriate regulatory authorities, which could lead to civil or criminal penalties for Sucon and/or the responsible person.

### 9.5 Appeal Process

Verdicts that are believed to be unfair by the Administration can be challenged via writing to the Council. Verdicts believed to be unfair by the Council must be challenged in writing to the Legal Counsellor as stipulated in the 'Misconduct Process and Procedures'

### 9.6 Whistle Blower Protection and Retaliation Prevention

All Sucon staff, Council, and affiliate members are responsible for protecting the identity, security, and employment of the whistle-blower to prevent confrontation and retaliation from the alleged suspect and violator. Sucon staff, Council and affiliating members found to have leaked the identity of the whistle-blower are subject to suspension or termination by the Council or Administration depending on the level and severity of the case. Sucon staff, Council

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and affiliating members found to have participated directly or indirectly in retaliation are subject to suspension or termination by the Council or Administration depending on the level and severity of the case.

Whistle-blowers who are found to have falsified claims in an attempt for defamation are also subject to suspension or termination by the Council or Administration depending on the level and the severity of the case.

## **10. POLICY FEEDBACK**

All Sucon employees and students may provide feedback about this document by emailing [info@sucon.ws](mailto:info@sucon.ws)

**SUCON Consultancy Ltd**

**Telephone** +0685 7519157

**Address:** Sucon Headquarters  
Sanalele Complex, Vaea Street, Apia  
Samoa

**website** <https://sucon.ws/>