

 <b>The University of British Columbia Board of Governors</b>	<b>Policy No.:</b>  <b>SC4</b>
<b>Long Title:</b>  Environmental Protection Compliance	
<b>Short Title:</b>  <b>Environmental Protection Policy</b>	

**Background & Purposes:**

The Purpose of this Policy is as follows:

- to provide a formal statement of commitment in response to global and local concerns regarding environmental protection;
- to provide a framework for establishing procedures that will ensure consistent response to environmental issues, and demonstrate responsibility and due diligence on the part of the University;
- to develop auditing and monitoring procedures which are effective for a university setting;
- to ensure compliance with all applicable environmental regulations at all sites of University activity;
- to provide for the development of programs to prevent pollution;
- to provide communication and education about environmental issues;
- to provide a platform for sustainable development efforts at UBC.

**1. General**

1.1. UBC will act responsibly and demonstrate accountable management of the property and affairs of UBC in protecting the environment. All individuals in the University community share the responsibility for protecting the environment. Administrative heads of unit are responsible for ensuring compliance with legislation and UBC procedures both on and off campus.



## PROCEDURES ASSOCIATED WITH THE ENVIRONMENTAL PROTECTION POLICY

*Pursuant to the Regulatory Framework Policy, the President may approve Procedures or the amendment or repeal of Procedures. Such approvals must be reported at the next meeting of the UBC Board of Governors or as soon thereafter as practicable.*

*Capitalized terms used in these Procedures that are not otherwise defined herein shall have the meanings given to such terms in the accompanying Policy, being the Environmental Protection Policy.*

### 1. General

- 1.1 The University will continue to develop and maintain an environmental management system consistent with the purpose of this policy and with the goal of continual improvement.
- 1.2 Procedures and reporting structures for matters of compliance with environmental legislation are necessary to demonstrate due diligence of UBC, its Board of Governors, senior officers, students, and members of faculty and staff, by addressing responsibly activities which have potential for exposure to lawsuits and prosecution.
  - 1.2.1 *"Where a corporation commits an offense under this Act, any officer, director or agent of the corporation who directed, authorized, assented to or acquiesced in or participated in the commission of the offense is a party to and guilty of the offense, and is liable to punishment provided for the offense, whether or not the corporation has been prosecuted or convicted." ... Section 122 of the Canadian Environmental Protection Act*
- 1.3 Procedures, guidelines and programs addressing specific environmental issues will be developed and updated as required, as part of the University environmental management system, to accomplish the objective of compliance with environmental legislation, with the full participation of the University community. These will include evaluation guidelines and monitoring procedures, effective measures of progress, reporting mechanisms, educational programs, and contingency plans for accidents that affect the environment.
- 1.4 The Manager, Environmental Programs and the UBC Okanagan HSE Officer, both reporting through the Director, Health, Safety and Environment and the Vice-President, Finance and Operations, will be responsible for focusing efforts on the most serious problems, promoting development of the environmental management system and coordinating activities through administrative heads of unit. These efforts include environmental audits, central monitoring, recording and reporting progress (and instances of non-compliance) on environmental protection issues, providing training to the campus community and serving as the central information source about current and anticipated legislation applicable to UBC as well as providing linkages for sustainable development efforts.

## 2. Detailed Procedures

- 2.1 The Manager, Environmental Programs and the UBC Okanagan HSE Officer, in conjunction with the Environmental Programs Advisory Committee, will develop and maintain a process for identifying the University's significant environmental impacts and for developing objectives and targets to manage and reduce these impacts where feasible.
- 2.2 Environmental audits will be performed of all areas and activities under the control of the University. Audits will include evaluation of waste, emissions, hazardous materials, emergency response procedures and the adequacy of training of students, faculty and staff. Such audits will measure the extent of compliance with federal, provincial and local legislation and identify potential environmental risks.
- 2.3 An action plan will be developed by the administrative head of unit for bringing all identified deficiencies into compliance with legislation, in consultation with the Manager, Environmental Programs, and will be forwarded to the Vice-President responsible for the unit for approval of actions, timing, and funding.
- 2.4 Monitoring systems and procedures for handling and reporting accidents/incidents will be established for all activities and areas of concern. Administrative heads of unit are responsible for ensuring that the monitoring is carried out in accordance with established systems and for reporting on the monitoring to both the unit's Vice-President and the Manager, Environmental Programs or the UBC Okanagan HSE Officer, as applicable. Deficiencies detected through monitoring or other means will be corrected as soon as possible.
- 2.5 Environmental Programs will develop programs designed to prevent pollution and will encourage and support such activities within the University community.
- 2.6 When the impact or experimental design of activities to be conducted at off campus locations has unknown or potentially harmful environmental consequences, the member of faculty or staff responsible will apply in advance for a certificate of environmental protection from the Environmental Programs Advisory Committee to review and authorize such activities. Research protocols, consistent with practices approved by the Advisory Committee for individual experiments, may be authorized by the Advisory Committee for experiments which are to be repeated. These steps are necessary because of the university's potential liability for problems arising from off-campus activities.
- 2.7 Administrative heads of unit are responsible for ensuring communication about the goal of compliance with environmental legislation and appropriate training of all persons working or studying within their units in relevant environmental issues and procedures for recognizing, dealing with and reporting accidents that affect the environment.
- 2.8 Supervisors and principal investigators are responsible for ensuring University procedures are followed and for instructing personnel under their supervision regarding applicable policies, programs and procedures. Individuals working in environmentally sensitive areas or with potentially hazardous materials must be given appropriate supervision, instruction and training prior to undertaking work.

- 2.9 Reports of all audits, plans for correcting deficiencies, reports on satisfying monitoring requirements, accident-handling procedures and any minor accidents/incidents will be brought, through the senior officers of the University, to the Board of Governors at its regular meetings. Any accidents/incidents of significant environmental impact will be brought to the attention of the Chair of the Board of Governors by the President or his/her designate immediately.
- 2.10 When potentially harmful conditions arise or are discovered, the administrative head of unit is responsible for notifying individuals who might be affected and keeping them aware of efforts to correct the situation.
- 2.11 The Manager, Environmental Programs and the UBC Okanagan HSE Officer ensure that consultations with the campus and surrounding communities about the state of compliance and progress toward it take place. The Manager, Environmental Programs will publish annually a report which includes information on the audits conducted, the compliance issues dealt with and outstanding, training and communication activities, and responses to accidents affecting the environment.

### 3. Definitions

- 3.1. *Administrative head of unit* means a Director of a service unit, a Head of an academic department, a Director of a centre, institute or school, a Principal of a college, the Coordinator of Health Sciences, a Dean, an Associate Vice-President, the Registrar, the University Librarian, a Vice-President or the President.
- 3.2. *Due diligence* means the care a reasonable person would take, having regard to all the circumstances and information about which that person knew or ought to have known.
- 3.3. *Environment* means the biophysical conditions under which people or things live or are developed.
- 3.4. *Environmental audit* means a systematic, objective method of identifying and verifying that laws, regulations, procedures and University guidelines for environmental, health, occupational hygiene, safety and emergency preparedness standards are being followed. The examination involves analysis, testing and confirmation of procedures and practices.
- 3.5. *Supervisor* means a person, not necessarily an administrative head of unit, who has been delegated supervisory responsibility for others working or studying at UBC.
- 3.6. *University community* means all persons associated with The University of British Columbia, including students, members of faculty and staff, visitors, contractors, suppliers, tenants, and users of facilities.



## EXPLANATORY NOTES REGARDING THE ENVIRONMENTAL PROTECTION POLICY AND ASSOCIATED PROCEDURES

Issued July 2019 by the Office of the University Counsel

*The OUC has prepared these Explanatory Notes to provide context and background regarding the Environmental Protection Policy. These Explanatory Notes do not replace or supersede the content of the Environmental Protection Policy and its Procedures.*

**Policy Long Title:** Environmental Protection Compliance

**Policy Short Title:** Environmental Protection Policy

**Policy Number:** SC4

**Responsible Executive:** Vice-President, Finance and Operations

**Responsible Board Committee:** Audit Committee

**Related Policies:** GA2 - Regulatory Framework Policy

**History:**

- The Environmental Protection Policy and Procedures were first approved by the Board of Governors in January 1994;
- The Environmental Protection Policy and Procedures were revised in June 2005;
- The Environmental Protection Policy was updated in July 2019 to reflect a new policy identification system; it is currently identified as the Environmental Protection Policy, its long title is Environmental Protection Compliance, and its number is SC4. The previous identification number for this policy was #6;
- The Procedures were updated in September 2019 to reflect current position titles.

**Related Legislation:** *Canadian Environmental Protection Act R.S.C. 1999, c. 33*