



Environmental Plan

2024-2027



Document Title

Environmental Plan 2024-2027

Document Owner	Environmental Compliance Specialist	Related Process	David McBrayne Group Ltd Environmental Policy
Document Author	Environmental Compliance Specialist	CMS Filing Location	Environmental Management

Contents

1	INTRODUCTION	2
1.1	Assessment of the current state of the environment in which we operate	2
1.2	Our vision	2
1.3	Responsibilities per department	2
2	GOALS.....	3
2.1	GOAL 1 – PROVIDE A MORE ENVIRONMENTALLY SUSTAINABLE SERVICE	3
2.2	GOAL 2 – REDUCE SCOPE 2 AND 3 EMISSIONS BY 2% YEAR ON YEAR	5
2.3	GOAL 3 – FOSTER ECONOMIC GROWTH OF OUR ISLAND COMMUNITIES, AND SUPPORT THEIR JOURNEY TO CARBON NEUTRALITY	6
2.4	GOAL 4 – INCREASE OUR RECYCLING RATE TO CONSISTENTLY EXCEED 70% AND REDUCE OUR LANDFILL RATE TO 5% BY 2028	7
2.5	GOAL 5 – ACTIVELY CONTRIBUTE TO BIOSECURITY, AND CONSERVATION, IN THE AREAS WE OPERATE	8
2.6	Selection and design of the best strategies and actions	9
2.7	Implementation and adaptation of the plan	9
2.8	David McBrayne Ltd Group Environmental Policy	9
3	DOCUMENT REVIEW	9
4	DOCUMENT CHANGE INFORMATION.....	10



1 INTRODUCTION

CalMac Ferries is committed to supporting the aims of the Scottish Government to provide a wealthier and fairer, smarter, healthier, safer and stronger, and greener Scotland.

We are a lifeline service provider in the Clyde and Hebrides Regions and are part of the DNA of the Highlands and Islands, embedded in the local community where we play an integral part in the economic sustainability of the area's social and business life.

We will minimise impact on the marine and terrestrial environments in which we operate and wherever possible, enhance biodiversity and the quality of Scotland's natural environment for future generations to enjoy.

We are subject to both terrestrial and marine environmental legislation and strive to go beyond minimum compliance wherever possible.

We operate under the requirements of our ISO 14001:2015 Environmental Management System which identifies and mitigates the environmental risk of our operations. Our environmental performance is managed by the Environmental Manager with support from across the organisation.

1.1 Assessment of the current state of the environment in which we operate

The CalMac network extends over six local authority areas up the west coast of Scotland, covering roughly 10 thousand square miles, and over 500 miles of coastline. We operate in 54 port locations, located across the west coast including locations on 22 western isles.

According to the Scottish Government's Scotland's Blue Economy: Current Review, published February 2023, "Scotland's marine ecosystems are healthy and functioning"¹. The largest risk identified to the longevity of the health of the marine environment is a rise in atmospheric temperature, caused by climate change.

Other risks CalMac has identified, and would like to note include:

- Adherence to our internal waste management procedures;
- Our potential impact on island wildlife, and biosecurity;

Our emission rate, and contribution to climate change.

1.2 Our vision

CalMac's new business plan sets out three main objectives with the aim of providing as best and resilient a service possible. There is a strong focus, within the plan, on our customers, our colleagues, and our communities.

Aligning this focus with our commitment to the environment, we have developed the following vision for the Environmental Plan:

To be a responsible, and forward-thinking, ferry operator, and to contribute to improvement of life wherever we sail. To navigate through these environmentally challenging times, and become a company which has achieved progress, and innovated successfully, towards creating a more sustainable future.

To deliver on this vision, CalMac has identified five tangible goals, with climate change mitigation being the driving force behind the development of these goals. These goals are listed and detailed in section 2.

1.3 Responsibilities per department

- **Bolded text** – indicates activities are relevant to more than one department.

Department	Agreed activities	Role responsible	Additional cost associated to meet Environmental objective
Finance	GOAL 1, G	Senior Procurement Business Partner	-



	GOAL 4, A	Senior Procurement Business Partner	-
	GOAL 5, F	Senior Procurement Business Partner	-
Operations	GOAL 1, A	Port Managers	-
	GOAL 1, C	Port Managers	Yes
	GOAL 2, D	Facilities Manager	Potentially
	GOAL 2, E	Facilities Manager	-
	GOAL 4, E	Head of Performance Improvement	-
	GOAL 5, B	Head of Operations	-
	GOAL 5, C	Head of Operations	-
	GOAL 5, D	Harbour Operations Manager	-
	GOAL 5, E	Port Managers	-
	Strategy and Change	GOAL 1, B	Strategic Planning Manager
GOAL 3, C		Environmental Compliance Specialist	-
GOAL 4, B		Environmental Compliance Specialist	Yes
GOAL 4, C		Environmental Compliance Specialist	-
GOAL 5, A		Environmental Compliance Specialist	-
Standards and Performance	GOAL 1, D	Fleet Policy and Information Manager	-
	GOAL 5, B	Fleet Policy and Information Manager	-
Commercial	GOAL 1, E	Head of Digital Marketing and Ticketing	
	GOAL 1, F	Head of Digital Marketing and Ticketing	
	GOAL 3, A	Head of Retail	-
	GOAL 4, D	Head of Brand Marketing	Yes
Fleet Management	GOAL 1, D	Head of Major Vessels Head of Small Vessels	-
	GOAL 3, B	Head of Major Vessels Head of Small Vessels	-
	GOAL 4, E	Head of Major Vessels Head of Small Vessels	-
	GOAL 5, C	Head of Major Vessels Head of Small Vessels	-
HR	GOAL 2, A	Head of HR Services	-
	GOAL 2, B	Head of HR Services	-
	GOAL 2, C	Head of HR Services	-

2 GOALS

2.1 GOAL 1 – PROVIDE A MORE ENVIRONMENTALLY SUSTAINABLE SERVICE

2.1.1 How do we aim to meet this goal?

CalMac serve as the custodian of 35 vessels (21 small vessels, and 14 major vessels). 31 of which run on marine gas oil, 1 on petroleum, and 3 are hybrid MGO/electric vessels. We have an agreed timetable to service for our communities, so, in order to reduce our fuel consumption, have to continue to seek innovative approaches to how we operate.

Operational Activities include:



- A. Timing our sailings efficiently, will ensure our vessels run at their optimal fuel consumption speed for the majority of their time in service. Ports and vessels will work collaboratively to limit delays in departure, and therefore reduce the need to increase speed to make up time.

Strategy and Change Activities include:

- B. We will support and facilitate the introduction of six new, improved major vessels over the next three years. Four of which are built with Selective Catalytic Reducers which reduces the oxides of nitrogen released into the atmosphere. Another two vessels are dual fuel LNG/MGO. We welcomed the decision to introduce these dual fuel ferries at a time when LNG was considered one of the greenest solutions for fuelling the shipping industry. We will successfully deliver on this and expect to see a 25% decrease in CO2 emissions in comparison to equivalent MGO fuelled ships. We are aware of recent studies highlighting potential issues with LNG use, and we will commit to exploring improved sustainable solutions to fuel our ferries in future.


Operational Activities include:

- C. To limit car exhaust fumes coming from our ports and ferries, we will encourage drivers to not leave their cars idling while waiting to board the ferry.

Fleet Management and Fleet Information Activities include:

- D. We continue to regularly maintain our vessels, support energy efficiency upgrade projects, and have committed to maintain and regularly review our Ship Energy Efficiency Manuals (SEEMPs), specific to each vessel in the fleet.

Commercial Activities include:

- E. In May 2023, we introduced a new ticketing platform to streamline the ticketing process and significantly reduce paper usage. This shift aligns with our long-term vision of paper-free ticketing. We remain conscious that paper production can have a significant environmental impact, including deforestation and water pollution. By encouraging customers to purchase tickets through our digital platform and store tickets on their devices, CalMac is taking a proactive step towards a more sustainable future. For any remaining physical tickets, CalMac uses FSC-certified paper, ensuring the wood pulp comes from responsibly managed forests. 
- F. Customer tickets will be issued with travel and sustainability advice, including the above-mentioned action: to not leave cars idling while waiting to board ferries.

Procurement Activities include:

- G. Several of our ports have vehicles used to transport goods between sites, and an initiative has begun here to electrify our port vehicle fleet where practicable.

2.1.2 How will we monitor and evaluate this goal?

- Each vessel reports on its fuel consumption monthly. This data is collected by our Environmental Department, and compared to previous reporting periods. The data is calculated appropriately, and reported onwards as emissions produced.
- Arrival and departure of vessels is reported through our new eBooking system, and comparative reports can be extracted.
- We have begun consultation with island groups regarding the placement of future planned hybrid and electric vessels, and will commit to consult with islands groups to ensure the placement of these vessels is optimised to ensure smooth running of our operations, and to reduce emissions for key islands.
- To ensure our digital migration strategy remains aligned with customer adoption, we conduct annual reviews to assess customer preferences and adapt our approach accordingly.
- Ports report on fuel usage of port vehicles on a monthly basis. This data is captured and reported to the Environmental Department, which is calculated and reported on as emissions produced.



2.2 GOAL 2 – REDUCE SCOPE 2 AND 3 EMISSIONS BY 2% YEAR ON YEAR

2.2.1 How do we aim to meet this goal?

Scope 2 and 3 emissions are those made from all other aspects of the business, out with the emissions produced from running our services. Scope 2 and 3 emissions are the result of the companies' activities, but occur from sources not entirely within our control E.G. electricity usage. Note: Waste emissions are an import aspect of this goal not mentioned here, as GOAL 4 is dedicated to waste reduction.

Human Resources Activities include:

- A. Minimisation of unessential staff travel is encouraged, and the use of Microsoft Teams meetings supported when on-site presence is not necessary, however this is not possible for our vessel crew, who often have to travel considerable distances to meet their allocated vessel.
- B. We will ensure the expenses policy highlights the importance of minimising unnecessary travel.
- C. We will encourage good practice by more robust scrutiny of crew expense claims, through crew resources team.

Facilities Management Activities include:

- D. Building on our existing environmental training, which is currently available for all, staff will be reminded of the impact of their individual actions, and be encouraged to switch off monitors and devices at their power source. We will look into engagement options to ensure understanding and adherence.
- E. We will continue to support CMAL in the upgrade of our leased sites, and support energy saving installations, such as biomass, which currently powers our Brodick port terminal.



2.2.2 How will we monitor and evaluate this goal?

- Data on business mileage, air travel, train travel, and hotel stays is captured, and provided to the Environmental Department, and compared to previous reporting periods, as is electricity usage. The data is then reported onwards as emission produced.
- With comparison studies, and feedback from staff we can evaluate the effectiveness of any energy saving incentives we introduce.
- Actions raised, as a result of this plan, will be regularly reviewed through our online monitoring systems, PURE, or Safety Culture, and updated through to their timely resolution.

2.3 GOAL 3 – FOSTER ECONOMIC GROWTH OF OUR ISLAND COMMUNITIES, AND SUPPORT THEIR JOURNEY TO CARBON NEUTRALITY

2.3.1 How do we aim to meet this goal?

CalMac has a strong, and respectful relationship with many Scottish island authorities, and community groups. We strive only to strengthen these relationships further, and be a contributor to the ongoing sustainability, and betterment, of life on the Scottish Isles.

Retail Activities include:

- A. Our retail department has prioritised sourcing suppliers located on the islands we service. Currently 47 of our 65 retail suppliers are local to a western Scottish isle. We will continue to source, engage, and promote local producers, and look for more opportunities to receive goods from small local producers.

Fleet Management Activities include:

- B. Maintaining a reliable ferry service for our island communities will ensure that businesses and individuals have the ability to trade and commute across the waters. Disruptions to our services are avoided as much as possible, and we deploy our vessels as per most appropriate to each route to minimise weather disruptions. With the implementation of 6 new major vessels, we will be able to relieve some aging vessels, and have a larger relief pool of vessels to cover when vessels are removed from service unavoidably.

Environmental Compliance Activities include:

- C. We have engaged with Carbon Neutral Islands (CNI), a Scottish Government programme, highlighting 4 islands with our network, with the aim to reach carbon neutrality by 2040, and will commit to share relevant data that will allow these islands to accurately measure their relative carbon footprint, to prioritise carbon savings initiatives. We will support and actively engage, as a partner, in waste and emission reduction projects with CNI, leading the way as a responsible transport operator.

2.3.2 How will we monitor and evaluate this goal?



- By comparing supplier lists from previous years, we can accurately evaluate how many more local producers we are supporting and engaging with.
- Our Executive Chief has attended producer events on some islands within our network, and will continue to engage in similar events that showcase local produce, with the aim of increasing our islander supplier base.
- All sailing data is recorded and reported on through our eBooking system.
- By partnering with CNI, we open a data sharing opportunity that will allow us to assess more accurately the impacts of our operations on the environment within the areas of the CNI islands. This opportunity will also allow us to engage with the communities more effectively over a topic that is of vital importance to us all.

2.4 GOAL 4 – INCREASE OUR RECYCLING RATE TO CONSISTENTLY EXCEED 70% AND REDUCE OUR LANDFILL RATE TO 5% BY 2028

2.4.3 How do we aim to meet this goal?

Annually, CalMac dispose of approximately 2000 tonnes of waste. Our most recent and improved figures show that 60% of our waste is recycled, 30% is sent to landfill, and the remaining 10% is sent to energy recovery.

The Scottish Government aim to make Scotland a zero-waste society with, a circular economy. By 2025 the Scottish Government aim to reduce total waste arisings by 15% against 2011 levels, reduce food waste by 33% against 2013 levels, recycle 70%, and send no more than 5% of remaining waste to landfill.

Procurement Activities include:

- A. We have developed a Sustainable Procurement Strategy which is embedded within our Procurement Strategy, that ensures we are prioritising the environment when engaging with new suppliers.

Environmental Compliance Activities include:

- B. We will continue to roll-out new recycling incentives. In 2023 we engaged two new suppliers to recycle lithium hybrid batteries, and mattresses. These two initiatives prevented approximately 15 tonnes from going to landfill, that's 2.5% of our annual landfill. On the agenda for 2024 is uniform and PPE recycling, and mooring rope recycling.
- C. A planned review and update of waste management procedures should streamline and simplify recycling processes, and provide information for our staff so they can ensure best practice recycling processes are followed.

Commercial Activities include:

- D. It has been identified that the waste signage for passengers, and staff, could be improved to provide clearer information about each type of waste stream, and how to correctly dispose of items. Working with the Brand Design Manager, our suppliers, and community groups, we aim to provide an engaging narrative to ensure optimal use of our bins.

Fleet Management and Operational Activities include:

- E. Improvements to adherence of the waste management procedure will be implemented after afore mentioned review of the procedure. Correct waste disposal, and an understanding of the impact of waste on the environment, will be better instilled upon CalMac staff.

2.4.4 How will we monitor and evaluate this goal?



- Waste figures are recorded and reported on monthly per port. OpExCo reports are generated, comparing the recycling figures to those of the same month in the previous year, and our year-to-date figures.
- Suppliers are scored and evaluated on a regular basis, and supplier management meetings held, where weaknesses in service are identified (if any), and improvements discussed and agreed upon.
- Feedback from improvement projects and/or trials combined with waste figures will allow us to identify the most effective ways to improve our waste management procedure and processes.

2.5 GOAL 5 – ACTIVELY CONTRIBUTE TO BIOSECURITY, AND CONSERVATION, IN THE AREAS WE OPERATE

2.5.1 How do we aim to meet this goal?

It is acknowledged that the waters CalMac traverse are habitat to many unique species, and that much of the area in which we operate comes within the Scotland Marine Protected Areas (MPAs). We also service islands with significance to nesting bird populations, and therefore have an opportunity to ensure our impact on these places is minimised.

Environmental Compliance Activities include:

- A. We have a Marine Awareness Programme, which allows us to support regular monitoring activities, and promotional events, of various environmental groups. We will look to expand this to support more far-reaching research studies with a conservation aim.

Operations and Fleet Information Activities include:

- B. We have received biosecurity guidance from Royal Society for the Protection of Birds (RSPB), and will continue to incorporate this guidance into our operating procedures where possible. This will be published on our Corporate Management System (CMS), as has previously been done for guidance around nesting birds at ports and in vessels.

Operations, and Fleet Management Activities include:

- C. We will undergo Predator Free Certification; a new programme being rolled out by RSPB in 2024 to increase biosecurity on vulnerable seabird islands. This will involve crew, and port staff awareness training, vermin checks on vessels, and messaging to passengers.

Operations and Harbour Operations Activities include:

- D. At our 26 CMAL owed ports we run monthly litter surveys and collections, and invasive weed species control activities. The boundaries of the port areas we are responsible for have been mapped, and are available on our public website. Such activities have contributed to CMAL receiving silver awards, from Keep Scotland Beautiful, at the completion of recent audit of these ports. CalMac is committed to supporting CMAL obtaining gold status, through continuous improvement that will be measured by internal auditing activity.
- E. By identifying the local habitat vulnerabilities near each of our ports, we can assign specific and targeted conservation activities and goals at each of our locations.

Procurement Activities include:

- F. We will ensure that improvements to both slipway cleaning and weed control methods are not only compliant with environmental legislation, but that we source the most environmentally sustainable options available on the market.

2.5.2 How will we monitor and evaluate this goal?

- We record all volunteer activities, and report on outcomes of these activities on our intranet and public website. We can call on these partnerships to provide us with up-to-date information and progress on conservation and biosecurity efforts.



- Our eligibility to receive, and maintain Predator Free Certification will be assessed externally. We will embed required training and actions into our regular procedures to ensure we continue to meet requirements each year.
- Ports maintain biodiversity plans, unique to each location. New incentives can be included in these plans, and monitored as per regular scheduled reviews.
- By having documented arrangements in place, whether through internal process or by award of external contracts, we can ensure we only use regulator approved methods and substances for slipway cleaning and weed control.
- Any environmental risks or incidents are logged within our incident reporting system, PURE. These are closely monitored, and actioned. A report on the number of similar occurring incidents can help us to identify which areas may present weaknesses, to allow us to focus our efforts effectively.

2.6 Selection and design of the best strategies and actions

This plan has been written with consultation of several areas of the business. The goals above have been selected to support CalMac's drive for continuous improvement and considered within our sphere of influence. Goals are tailored to the uniqueness of our business.

We have decided to maintain, or build on, several existing company environmental initiatives, including:

- CalMac's Marine Awareness Programme;
- Incorporating biosecurity guidance into our operating procedures;
- CalMac's Sustainable Procurement Strategy;
- Our commitment to implementing new recycling initiatives;
- Voluntarily maintaining Ship Energy Efficiency Manuals, after the legal requirement has lapsed.

2.7 Implementation and adaptation of the plan

This plan, after consultation with key stakeholders, will be communicated to all our employees via our internal communication channels, and will be published on our intranet as part of our Company Management System.

It is understood that the goals of this plan will be considered across the company when writing new procedures, and that any actions arising from this plan, will be regularly reviewed, until their timely resolution.

The progress of this plan will be subject to annual review, however, the objectives of the plan align with the three-year strategy set out by the organisation.

2.8 David McBrayne Ltd Group Environmental Policy

[DML Group Ltd Environmental Policy](#)

3 DOCUMENT REVIEW

The Environmental Compliance Specialist is responsible for reviewing this document in consultation as required.

Notwithstanding the above, all personnel have a responsibility to use this document critically and to forward any suggestions for its improvement through their management line or use the [feedback](#) function in the SharePoint Company Management System.



4 DOCUMENT CHANGE INFORMATION

The table below notes the changes made since the document was previously published.

Date of change	What changed	Who changed (title)	Who changed (name)
28/08/2024	First Issue	Environmental Compliance Specialist	Emily Meyer