The Action Plan for the Environment and Sustainable Development sets out the overarching objectives for the University’s work on the environment and sustainable development and the responsibility for how these are to be realised in the University’s activities.
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INTRODUCTION

The University of Gothenburg, together with other higher education institutions, has a unique opportunity to contribute to societal development through our role as educator of future generations of citizens and decision-makers. The University is actively working to integrate sustainable development into courses and study programmes through, for example, the sustainability labelling of courses and study programmes. Furthermore, web-based toolboxes have been developed to support teachers in integrating sustainable development into courses and study programmes. The University is assuming its responsibility to provide solutions for major, contemporary, global challenges by investing 300 million Swedish kronor in the years to come into six multidisciplinary research centres within global societal challenges (the UGOT Challenges – University of Gothenburg Centres for Global Societal Challenges), in addition to its existing research within the area of sustainability. Furthermore, the University is working on refugee issues in a broad and multifaceted way, and has social sustainability as its long-term objective.

The work of the University is also influenced by Agenda 2030, which includes the UN’s 17 global sustainable development goals (see Figure 1). These goals will guide our global development work over the next 15 years. The targets are integrated and balance the three dimensions of sustainable development: financial, social and environmental.

Figure 1: The countries of the world have undertaken from 2016 until 2030 to take the world forward into a sustainable and fair future. The purpose of the global targets and Agenda 2030 is, among other things, to fight climate change, create sustainable cities and make human rights a reality for everyone.
The University of Gothenburg, together with Chalmers, hosts the Northern-European node of the Sustainable Development Solution Network (SDSN), which is a UN-initiated network and key stakeholder for operationalising the UN’s sustainable development goals. Scientific and technical expertise from academia, public authorities and industry is being mobilised for the work within SDSN Northern Europe (SDSN NE) to jointly influence decision-making, and to promote problem-solving and support sustainable development at a local, national and global level.

Academic and administrative staff, students and external parties cooperate with the University of Gothenburg’s environmental and sustainable development work. We are striving to use the University’s unique capacity in terms of access to new knowledge, education and physical environments for studying, teaching, testing, applying and learning both knowledge-based and technical ideas and solutions.

This Action Plan primarily deals with the ecological dimensions of sustainable development but also includes social and economic perspectives. Most of the University’s sustainable development work is carried out within research, education and third-stream activities. Social sustainability is also integrated into work environment and equal treatment work and is primarily governed by the following documents: University-wide Action and Operational Plan* and Policy and Action Plan for Gender Equality and Equal Treatment**.

** [http://medarbetarportalen.gu.se/styrdokument/likabehandling/](http://medarbetarportalen.gu.se/styrdokument/likabehandling/)
THE ENVIRONMENTAL MANAGEMENT SYSTEM

The University of Gothenburg has had an environmental management system since 2004, which is certified according to ISO 14001 and registered under the EMAS (Eco-Management and Audit Scheme), which means that our university is constantly improving its operation with a view to reducing any negative environmental impact and supporting the positive effects for sustainable development gained through research, education and cooperation with the surrounding society. Vision 2020 clearly expresses the value base and basic principles for the University of Gothenburg: “Sustainable development is important to us; we always consider the long-term social, economic and ecological consequences and allow them to guide our operations”. The principles of Global engagement and Strong civic responsibility state that we will work to promote sustainable development, which is concretised in the Environmental Policy. Through our environmental management system (see Figure 2), we are working in a strategic, systematic and goal-oriented way to improve our environmental performance, reduce the negative environmental impact and strengthen our work within sustainable development and thereby achieve the ambitions contained in Vision 2020 and the Environmental Policy.

Leadership

Plan
Environmental policy, objectives and action plan, list of environmental legislation, important environmental aspects

Evaluate
Review by the management team, implement improving and preventative measures

Intended result
Reduced negative environmental impact and enhanced positive impact for sustainable development.

Follow up
Internal and external environmental audits, sustainability reporting, evaluation of compliance with environmental legislation

Implement
Procedures, competence development, communication

Figure 2. The environmental management system is based on the PDCA (Plan, Do, Check, Act) cycle with a view to reducing the negative environmental impact and achieving constant improvements.
ORGANISATION AND RESPONSIBILITY

The responsibility of the management team was made more stringent through the recently revised ISO 14001:2015 standard regarding the environmental management system’s integration into the organisation’s strategic and operating operational processes, the allocation of necessary resources and in respect of the achievement of objectives and results. The management team has also been given a clearer responsibility to lead and support other officers and employees so that they contribute to a properly functioning environmental management system.

The Vice-Chancellor is responsible for, and makes decisions concerning, the environmental management system at the University of Gothenburg. The Centre for Environment and Sustainability (GMV) has had the operational responsibility for developing and following up the environmental management system since 1 January 2016.

The Vice-Chancellor is responsible for delegating and assigning environmental responsibility to appropriate levels of the organisation. Responsibility and authority follow the University’s Rules of Procedure and Delegation of Authority Policy* together with the regulation document Roles, Responsibility and Authority within the Environmental Management System**.

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* http://medarbetarportalen.gu.se/styrdokument/organisation/
** http://medarbetarportalen.gu.se/styrdokument/miljo/
CONTENT AND SCOPE OF THE ACTION PLAN

The Action Plan for the Environment and Sustainable Development includes the important environmental aspects; i.e. those areas within the University identified as having the greatest impact on the environment. The environmental and sustainability objectives for the period 2017 to 2019 have been divided into two main areas and eight sub-areas:

Core operation
- Research
- Education
- Student participation

Core operation

Sustainable resource management
- Procurement and purchasing
- Travel
- Energy and buildings
- Chemical substances and environmental risks
- Reuse and waste

*‘Cooperation with the surrounding society’ and ‘Skills development’ are also important environmental aspects at the University. These environmental aspects have been integrated into other objective areas within the Action Plan. The tasks for the cooperation with the surrounding society and skills development can be found within the eight sub-areas.*
GUIDANCE FOR THE OPERATION

The dean and head of department (equivalent) are given tasks for each objective area in the Action Plan. The operation shall work continuously on these tasks over the three-year period to which the Action Plan relates. Each department (equivalent) concretises the implementation of the tasks in its operational plan or alternatively in an ‘activity list’. The process for planning and following up the departments’ activity lists within the environment and sustainable development follows the process for the faculties’/departments’ operational plans in accordance with Table 1.

<table>
<thead>
<tr>
<th>Month</th>
<th>Process: Action and operational plans according to Vision 2020</th>
<th>Process: Action Plan and activity lists within the environment and sustainable development</th>
</tr>
</thead>
<tbody>
<tr>
<td>January</td>
<td>The faculties report back on the follow-up of the operational plan for the preceding year and contribute by providing information for the Annual Report.</td>
<td>The departments report back on the follow-up of the activity lists for the preceding year and contribute by providing information for the Annual Report and sustainability reporting.</td>
</tr>
<tr>
<td>February</td>
<td>The departments disseminate the results of the preceding year’s work on the environment and sustainable development within their own operation.</td>
<td></td>
</tr>
<tr>
<td>March</td>
<td>Evaluation and any revision of the Action Plan for the Environment and Sustainable Development are implemented at a university-wide level.</td>
<td></td>
</tr>
<tr>
<td>April</td>
<td>A spring dialogue relating to the follow-up is held with the faculties.</td>
<td></td>
</tr>
<tr>
<td>August</td>
<td>Action and operational plan at the university-wide level is produced for the next period.</td>
<td>The departments implement their own half-yearly follow-up of the work on the operational plan/activity list.</td>
</tr>
<tr>
<td>September</td>
<td>Action and operational plan at the university-wide level is determined and sent to the faculties together with instructions and standard forms.</td>
<td>Instructions and standard forms for next year’s activity list is sent to the faculties/departments.</td>
</tr>
<tr>
<td>October</td>
<td>The faculties’ action and operational plans for the next period are determined and sent to the Vice-Chancellor.</td>
<td>The departments produce new activities within the environment and sustainable development for the next year.</td>
</tr>
<tr>
<td>November</td>
<td>An autumn dialogue relating to the operational plan is held with faculties and departments.</td>
<td>The departments’ activity lists for the environment and sustainable development for the next year are determined.</td>
</tr>
</tbody>
</table>

Table 1: The work on the Action Plan and activity lists within the environment and sustainable development in relation to the process for the action and operational plans according to Vision 2020.

* The Environmental Manual includes a standard form for the activity list: www.medarbetarportalen.gu.se/miljohandbok.
FOLLOW-UP

The objectives, tasks and indicators in the Action Plan are to be followed up annually by the Centre for Environment and Sustainability (GMV). The faculties (equivalent) and departments (equivalent) must follow up their own tasks and activities, and also assist by providing data for the University’s Sustainability Report. Results will be presented in the University’s Annual Report and at the management review with the Vice Chancellor. The reporting also constitutes supporting information for reporting back to the Swedish Government and reporting under EMAS (Eco-Management and Audit Scheme). See also procedures for the follow-up process in the Environmental Manual (www.sustainabilityreport.gu.se).

Each environmental objective is to be followed up using an indicator, which shows whether or not the University has achieved the objective. The quantitative indicators for the areas of research, education and student participation are to be supplemented with a qualitative follow-up that aims to provide a more comprehensive picture of the result.
RESEARCH

Objective

The University will promote research with a view to identifying, increasing knowledge about and also resolving global societal challenges.

Tasks

Assistant vice-chancellors, deans, heads of department (equivalent) are tasked with:

- Breaking down the university-wide objective into activities that are relevant to their own operation and including these in the operation’s action and operational plans or in an activity list.

Tasks for university-wide resources

The Centre for Environment and Sustainability (GMV) is tasked with

- Providing information about and encouraging researchers to apply for research funding within sustainable development in collaboration with the Grants and Innovation Office;
- Strengthening contacts with research funders and monitoring announcements of research funding within sustainable development in collaboration with the Grants and Innovation Office;
- Taking the initiative for and encouraging interdisciplinary research projects focused on sustainable development;
- Identifying researchers and research linked to the global objectives for sustainable development with a view to strengthening cooperation within the University and collaboration with Chalmers;
- Developing and strengthening GMV’s network;
- Arranging meetings and conferences within sustainable development under own auspices and in collaboration with other parties;
- Further developing university-wide methods for evaluating research within sustainable development in collaboration with the University Library (UB);
- Working to increase the application of research results within the University’s operation with a view to creating sustainable campuses;
- Promoting problem-solving and supporting sustainable development at a local,
national and global level through the Sustainable Development Solutions Network Northern Europe (SDSN NE);

- Mobilising scientific and technical expertise from academia, public authorities and industry through SDSN NE to jointly influence decision-making within sustainable development;
- Strengthening collaboration between academia, the business community and public authorities with a view to conveying research knowledge within sustainable development;
- Collaborating with national and international universities concerning environmental management and sustainable development;
- Collaborating and communicating with other stakeholders at the University with a view to increasing awareness of the University’s environmental management work.

**The University Director, through the Division of Academic Support, is tasked with:**

- Supporting and encouraging the work to increase elements of sustainable development in the University’s public events;
- Communicating the University’s environmental certification in communication material, marketing and in public contexts;
- Supporting and encouraging the work to increase the visibility of the University’s environmental and sustainability work at external events;
- Providing information about and encouraging researchers to apply for research funding within sustainable development in collaboration with GMV;
- Strengthening contacts with research funders and monitoring announcements of research funding within sustainable development in collaboration with GMV.

**The University Library (UB) is tasked with:**

- Further developing university-wide methods for evaluating research within sustainable development in collaboration with GMV;
- Working to cooperate nationally with other university libraries concerning search words for the assessment of a number of scientific publications within sustainable development.

**Indicator**

The number of published scientific articles identified using a number of search words related to sustainable development*.

* The indicator is to be supplemented with a qualitative follow-up with a view to providing a more comprehensive picture of the achievement of objectives.
EDUCATION

Objective
The University will increase and quality assure the integration of sustainable development into courses and study programmes.

Tasks

Deans, heads of department (equivalent) are tasked with:
• Increasing the visibility and supporting the use of faculty-adapted toolboxes for sustainable development;
• Promoting competence development within sustainable development for the faculty and other relevant occupational categories;
• Integrating sustainable development into courses and study programmes;
• Strengthening the work on the sustainability labelling of courses and study programmes.

Tasks for university-wide resources

The Deputy Vice-Chancellor for Education, through the University Board of Education, is tasked with:
• Working to integrate sustainable development into courses and study programmes.

The University Coordination Board for Teacher Education is tasked with:
• Integrating sustainable development into teacher training.

The Centre for Environment and Sustainability (GMV) is tasked with:
• Initiating and organising interdisciplinary third-cycle courses within sustainable development;
• Providing education, study programme and course coordinators with support to increase and quality assure the integration of sustainable development into courses and study programmes.
• Coordinating and developing toolboxes for sustainable development;
• Annually evaluating and, when necessary, updating guidelines for the sustai-
nability labelling of courses and study programmes;
- Annually offering competence development within the area of sustainable
development to teachers at the University;
- Collaborating nationally and internationally with a view to developing the
work to increase and improve the integration of sustainable development into
courses and study programmes.

**The University Director, through the Division of Academic Support, is tasked with:**
- Increasing the visibility of the University’s work to integrate sustainable de-
velopment into courses and study programmes and also sustainability labelled
courses/study programmes;
- Providing system support and information to enable the sustainability label-
ling of courses/study programmes;
- Developing sustainability labelling in collaboration with GMV.

**The University Library (UB) is tasked with:**
- Further developing courses and study programmes in information resources
within sustainable development for students;
- Providing teachers and students with support within sustainable development
via Libguides.

**Indicator**

The proportion of sustainability labelled courses and study programmes out of
the total number of courses and study programmes per annum*.

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* The indicator is to be supplemented with a qualitative follow-up with a view to providing a more
comprehensive picture of the achievement of objectives and also quality assurance.
STUDENT PARTICIPATION

Objective

The University will increase student participation within sustainable development at the University and in society.

Tasks

Deans, heads of department (equivalent) are tasked with:
• Including students in the faculty’s/department’s (equivalent’s) sustainability work and in the work to integrate sustainable development into courses and study programmes;
• Supporting student initiatives within sustainable development;
• Increasing the visibility of and communicating the University’s work on sustainable development for students;
• Cooperating with Miljöbron and/or other stakeholders for exchanges with the business community and public activities within sustainable development.

Tasks for university-wide resources

The Centre for Environment and Sustainability (GMV) is tasked with:
• Including students in the University’s sustainability work, among other things by establishing a student team inspired by the Green Office Model;
• Supporting student initiatives and developing cooperation with student unions at the University within the area of sustainability;
• Arranging an annual themed day for students focusing on sustainable development in collaboration with the students’ sustainability organisations;
• Developing cooperation with Miljöbron and other stakeholders for exchanges with the business community and public activities within sustainable development;
• Supporting local, regional, national and international cooperation and exchanges within sustainable development for students.

The University Director, through the Division of Academic Support, is tasked with:

- Increasing the visibility of and communicating the University of Gothenburg’s work on sustainable development for the University’s students;
- Communicating the University’s sustainable development work when recruiting students and receiving new students.

Indicator

Number of activities and collaboration projects within sustainable development for, by or with students at the University of Gothenburg*.

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* The indicator is to be supplemented with a qualitative follow-up with a view to providing a more comprehensive picture of the achievement of objectives.
PROCUREMENT AND PURCHASING

Objectives

The University will impose a sustainability requirement for all framework contracts and increase the requirement specification for object procurements.

The University will increase the proportion of purchases where a sustainability requirement has been imposed within prioritised product areas.

Tasks

Deans, heads of department (equivalent) are tasked with:

- Working to ensure that a sustainability requirement is imposed for purchases.

Tasks for university-wide resources

The Centre for Environment and Sustainability (GMV) is tasked with:

- Contributing by providing expert knowledge within sustainable development and the lifecycle perspective for all procurements;
- Contributing by providing expert knowledge within sustainable development and the lifecycle perspective for all university-wide projects and system management;
- Working to increase the application of research results within the University’s sustainable resource management.

* 'Sustainability requirement' means financial, environmental, social and ethical requirements as well as requirements for a lifecycle perspective.

** Computers and screens, drinks, fruit, office paper, tissue paper, cleaning chemicals, cars, textile profile products and furniture.

*** In this Action Plan, 'lifecycle perspective' means the activities and processes that can be influenced by the University; from material extraction, manufacturing, transport, associated processes, handling within the operation, reuse and recycling/disposal. The extent to which we can influence varies from area to area. The lifecycle perspective is considered within 'Sustainable resource management' through imposing requirements on relevant parts of the process in procurements, call-offs and purchases, but also by working on our internal procedures for handling in the operation and by promoting reuse.
operation with a view to generating sustainable procurements and purchases;
• Strengthening the University’s work as a party within Fairtrade City Gothenburg;
• Implementing competence development for staff in collaboration with the Procurement Unit;
• Developing the work on and information about sustainability requirements within prioritised product areas in collaboration with the Procurement Unit;
• Conducting an annual follow-up of IT activities from a sustainability perspective in collaboration with the IT Unit;

The University Director, through the Division of Administrative Support, is tasked with:
• Imposing sustainability requirements for both procured suppliers and procured products/services;
• Imposing a requirement in procurements that suppliers are to increase the visibility of sustainability labelled/best sustainable products in all product catalogues;
• Imposing a requirement for system suppliers to develop sustainability labelling in the purchasing system with a view to both making visible and facilitating the purchase of sustainable products;
• Implementing competence development for staff in collaboration with GMV;
• Developing the work on and information about sustainability requirements within prioritised product areas in collaboration with GMV;
• Annually evaluating compliance with the environmental and sustainability requirements in the University’s Investment Policy*;
• Ensuring that sustainability requirements have been included and are being followed up in all parts of joint projects and in conjunction with their purchase, call-offs and procurements.

The University Director, through the Division of Infrastructure Support, is tasked with:
• Implementing an analysis of optimal use times for computers from a lifecycle perspective;
• Ensuring that a sustainability requirement is imposed for call-offs and procurement of IT;

* http://medarbetsportal.gu.se/styrdokument/ekonomi/
• Working to ensure that the lifecycle perspective is considered when developing IT services;
• Annually following up IT activities from a sustainability perspective in collaboration with GMV;
• Ensuring that there is a stocktaking client on all centrally configured university-owned computers and also working to ensure that a client is available on others;
• Developing sustainability requirements when purchasing IT equipment in collaboration with GMV and the Procurement Unit;
• Considering the lifecycle perspective when developing infrastructure services;
• Ensuring that a sustainability requirement is imposed for call-offs and procurement;
• Ensuring that a sustainability requirement is imposed for new tenancy agreements with cafés and restaurants on University premises;
• Ensuring that the University’s profile products are procured considering ambitious sustainability requirements;
• Extending the range of ecological, KRAV-labelled, Fairtrade-labelled, climate-friendly or locally produced food and drink at University restaurants and informing customers about these alternatives;

Indicators

Number of procurements (broken down according to framework contract and object procurement) where a sustainability requirement has been imposed on goods and services respectively out of the total number of procurements.

Financial value of the products/services purchased with a sustainability requirement, out of the total value, within each prioritised product area.
TRAVEL

Objective
The University will reduce carbon dioxide emissions from travel on official business per full-year employee by 2019 compared with 2015.

Tasks

Deans, heads of department (equivalent) are tasked with:
• Working to reduce the number of flights between Gothenburg and Stockholm;
• Promoting the staff’s use of technology for travel-free meetings (distance meetings);
• Facilitating and creating incentives for staff to ‘green’ travel on official business as well as travel to and from work.

Tasks for university-wide resources

The Centre for Environment and Sustainability (GMV) is tasked with:
• Developing and administering the University’s climate compensation system;
• Working to achieve opportunities for ‘green’ travel and transport in conjunction with the development of new campus areas in collaboration with stakeholders affected;
• Working to increase the application of research results within the University’s operation with a view to creating sustainable travel, travel-free forms of meetings and a reduced impact on the climate.

The University Director, through the Division of Infrastructure Support, is tasked with:
• Providing and developing technology and resources for travel-free meetings and disseminating knowledge about these;
• Developing concepts in collaboration with relevant stakeholders to encourage more students and employees to cycle to and from the University;
• Ensuring that all university buildings have adequate cycle parking in collaboration with property owners.

The University Director, through the Division of Administrative Support, is tasked with:

• Integrating environmental requirements into the Travel Handbook/web page, training activities and other relevant activities and increasing the visibility of and implementing the University’s Meeting and Travel Policy.

Indicator
Carbon dioxide emissions from travel on official business per full-year employee.
ENERGY AND BUILDINGS

Objectives
The University will reduce energy usage by 10 per cent per square metre by 2019 compared with 2015.

The University will impose environmental requirements corresponding to the Gold Environmental Classified building level for all new construction and major refurbishments.

Tasks

Deans, heads of department (equivalent) are tasked with:
- Working to reduce energy usage at the operation’s premises;
- Working to ensure that sustainability aspects are considered in new and existing campus development projects.

Tasks for university-wide resources

The University Director, through the Division of Infrastructure Support, is tasked with:
- Working to reduce energy usage at the University’s premises;
- Running a cooperation group with property owners to reduce energy usage and also increasing the renewable energy production;
- Prioritising renewable energy for new construction and refurbishments and also working to ensure that investments in existing premises lead to more efficient energy usage;
- Ensuring that the University’s policy and rules for new construction and refurbishments are applied;
- Working towards a switch to ecolabelled district heating or another ecolabelled heating system;
• Working to ensure that energy usage is visualised when developing new campus areas;
• Working to increase the application of research results within the University’s operation with a view to creating sustainable campuses;
• Ensuring that the planning of premises promotes financial, ecological and social sustainability in accordance with the University’s Strategic Premises Planning Plan*;
• Ensuring that sustainability aspects are considered in new and existing campus development projects.

The Centre for Environment and Sustainability (GMV) is tasked with:
• Working to ensure that sustainability aspects are considered, and research results applied, in new and existing campus development projects.

Indicators
Annual energy use in kWh per square metre.

Number of new construction and refurbishments where the University has imposed environmental requirements corresponding to the Gold Environmentally Classified building level.

* http://medarbetarportalen.gu.se/styrdokument/lokaler/
CHEMICALS AND ENVIRONMENTAL RISKS

Objective
The University will minimise the number of incidents leading to adverse consequences for the environment and work to minimise the consequences of incidents.

Tasks

Deans, heads of department (equivalent) are tasked with:
• Ensuring that an inventory is implemented annually in KLARA;
• Actively working to substitute hazardous chemicals at the department;
• Working to ensure that the KLARA chemical management system is used for risk assessments;
• Ensuring that the faculty has a final inspector in KLARA;
• Ensuring that GURIA is used to report deviations and propose improvements within the environment and sustainable development.

Tasks for university-wide resources

The University Director, through the Division of Infrastructure Support, is tasked with:
• Working to increase the phasing-out and reducing the volume of hazardous chemical products in favour of less hazardous alternatives;
• Arranging training courses on risk assessment and risk management for teachers and laboratory staff working in areas with a high environmental risk;
• Developing the GURIA system support;
• Collaborating with the University’s external security advisor with a view to minimising the number of incidents leading to adverse consequences for the environment;
• Establishing a university-wide KLARA inspector;
• Working to increase the application of research results within the University’s operation with a view to minimising environmental risks and improvement the handling of hazardous chemical substances.

**Indicators**

Number of incidents that have occurred with adverse consequences for the environment.

Number of activities performed with the view to preventing and minimising the occurrence of incidents leading to adverse consequences for the environment.
**REUSE AND WASTE**

**Objective**

The University will reduce the total quantity of waste by five per cent by 2019 compared with 2015.

The University will increase the proportion of waste that is reused, from which materials are recovered or which is composted by three percentage units by 2019 compared with 2015.

**Tasks**

**Deans, heads of department (equivalent) are tasked with:**
- Ensuring that all of the waste is sorted in accordance with the Waste Plan or is reused.

**Tasks for university-wide resources**

**The University Director, through the Division of Infrastructure Support, is tasked with:**
- Working to ensure that all waste arising is sorted at source in accordance with the Waste Plan;
- Working to increase the proportion of waste from which materials are recovered and which is composted;
- Drawing up procedures for how furniture, computers and other equipment can be reused more efficiently, optimising the use of resources;
- Implementing seminars and courses on resource management, operational waste and hazardous waste for staff and students;
- Working to increase the application of research results within the University’s operation with a view to creating good resource management and improving waste management;
- Ensuring that incorrectly sorted waste is reported as a deviation in GURIA;
- Working to ensure that obsolete computers are reused instead of being scrapped.

**Indicator**

Total annual quantity of waste in weight broken down into fractions.
Published: medarbetarportalen.gu.se/styrdokument and www.gu.se/miljo
Decision-maker: Vice-Chancellor
Reg.nr: V 2016/453
Responsible body: Centre for Environment and Sustainability (GMV)
Date of decision: 5 September 2016
Period of validity: 31 December 2019