

**Administrative Instruction****Matimba Power Station****Title: Reporting of environmental incidents****Document Identifier: 240-154036929****Alternative Reference PA/240/008
Number:****Area of Applicability: Matimba Power Station****Functional Area Environmental Management
Applicability:****Revision: 7****Total Pages: 12****Next Review Date: February 2023****Disclosure Controlled Disclosure
Classification:****Compiled by****WC Mocke
Environmental Officer****Date: 2020/02/27****Functional Responsibility****MC Mamabolo
Environmental Manager****Date: 2020/02/28****Authorized by****O Mabotja
(General Manager)****Date: 2020/02/28**

Content

	Page
1. Introduction	3
2. Supporting Clauses.....	3
2.1 Purpose	3
2.2 Scope.....	3
2.3 Applicability.....	4
2.4 Effective date	4
2.5 Normative/Informative References	4
2.5.1 Normative	4
2.5.2 Informative.....	5
2.6 Definitions	5
2.7 Abbreviations	6
2.8 Roles and Responsibilities	7
2.8.1 General Manager	7
2.8.2 Heads of departments/ Heads of function/ Supervisors.....	7
2.8.3 Environmental Manager	7
2.8.4 Environmental advisor/ Officer	7
2.8.5 Employees and contractors.....	8
2.9 Process for Monitoring.....	8
2.10 Related/Supporting Documents.....	8
3. Environmental incident management process.....	8
3.1 Incident reporting	8
3.2 Initiating of investigations	9
3.3 Incident investigations	9
3.4 Corrective actions	9
3.5 Remedy of incidents	9
3.6 Incident recording	10
3.7 <i>Trending of incidents</i>	11
3.8 <i>Sharing of lessons learned</i>	11
4. Record(s)	11
5. Addenda / Appendix.....	11
6. Acceptance	11
7. Revisions	12
8. Development Team.....	12
9. Acknowledgements.....	12

CONTROLLED DISCLOSURE

When downloaded from the document management system, this document is uncontrolled and the responsibility rests with the user to ensure it is in line with the authorised version on the system.

No part of this document may be reproduced without the expressed consent of the copyright holder, Eskom Holdings SOC Ltd.

1. Introduction

Matimba Power Station strives to conduct all its operations in an environmentally sound manner; this commitment is outlined in the Matimba environmental Policy (PS/270/083). The effective management of incidents is an integral component in ensuring that Matimba's Environmental policy principles are achieved. The aims and objectives of incident management are as follows:

- a) Reduce risk and prevent any recurrence of incidents.
- b) Ensure that incidents are managed effectively.
- c) Ensure that incidents are classified and recorded accurately.
- d) Ensure prompt and appropriate investigation.
- e) Share incident information.
- f) Report to external and internal stakeholders, as appropriate.
- g) Promote the analysis of trends, and review practices accordingly.

Incident management is not a mechanism for assigning blame or monitoring staff performance, but rather a way of identifying and addressing areas for improvement in order to reduce environmental impacts, risks and improve environmental compliance.

2. Supporting Clauses

2.1 Purpose

This document describes the process that needs to be followed when an environmental incident occurs during the course of Matimba's operations that could or does result in a negative environmental impact. The aim of this document is to ensure conformance to Matimba Power Station Environmental Policy (PS/270/083), ISO 14001 Environmental Management System Requirements and the Eskom Environmental Incident Management Procedure (240-133087117).

2.2 Scope

This procedure is applicable to all environmental incidents that occur as a result of Matimba Power Station's operations.

CONTROLLED DISCLOSURE

When downloaded from the document management system, this document is uncontrolled and the responsibility rests with the user to ensure it is in line with the authorised version on the system.

No part of this document may be reproduced without the expressed consent of the copyright holder, Eskom Holdings SOC Ltd.

2.3 Applicability

<div>NOTE: Mark appropriate block/s with a “X”</div> <div>(Select at least one)</div>	All	Head of department	Head of function	Head of section	Administration	Auxiliary	Civil	Control & Instrument	Electrical	Mechanical	Projects	Support	Training	Shifts	Other (Specify):
Matimba Staff	X														
Operating															
Maintenance															
Engineering															
Risk Management															
Human Resources															
Finance															
Production															
Contractors	X														

2.4 Effective date

This document will be effective from the date of authorization.

2.5 Normative/Informative References

Parties using this document shall apply the most recent edition of the documents listed in the following paragraphs.

2.5.1 Normative

- [1] 32-727 – Eskom, Safety, Health, Environment, and Quality Policy
- [2] PP/240/001 – Matimba Environmental Policy
- [3] 240-133087117 – Environmental Incident Management Procedure
- [4] 16/2/7/A400/B21/1 – Matimba Water use Licence
- [5] 12/4/12L-W4/A3 – Matimba Atmospheric Emission License
- [6] 12/9/11/L302/6 – Matimba Temporary Hazardous waste storage License number
- [7] 12/9/11/L206/5 – Matimba Waste Rock dump license
- [8] Environmental Management: Biodiversity Act 10 of 2004
- [9] National Forests Act 84 of 1998

CONTROLLED DISCLOSURE

When downloaded from the document management system, this document is uncontrolled and the responsibility rests with the user to ensure it is in line with the authorised version on the system.

No part of this document may be reproduced without the expressed consent of the copyright holder, Eskom Holdings SOC Ltd.

- [10] National Environmental Management: Waste Act 59 of 2008
 [11] ISO 14001 Environmental Management System Standard
 [12] ISO 9001 Quality Management Systems

2.5.2 Informative

- [13] PS/270/003 – Matimba emergency management response plan
 [14] PS/270/017 – Identification of SHE hazard/aspect and risk impact assessment and control
 [15] PG/240/003 – Environmental Legal and other Requirements
 [16] PS/179/00 – Matimba Occurrence Management Procedure
 [17] PS/270/017 – Identification of SHE hazard/aspect and risk impact assessment and control
 [18] PG/240/003 – Matimba Power Station Guideline: Environmental Legal and other Requirements Register
 [19] PG/240/006 – Matimba Environmental System Manual

2.6 Definitions

Definition	Explanation
Ash spillage	Refers to the spillage of ash (residue remaining from the burning of coal) or water containing ash, whether it is in its dry form or in the form of a slurry from any ashing activity on site that is released into the environment (including land or water, but excluding atmospheric and fugitive emission), which could or does result in an environmental impact.
Corrective actions	Actions identified to correct and/or prevent the reoccurrence of an incident. Previously referred to as safety measures.
Environment	Surroundings in which an organisation operates, including air, water, land, natural resources, flora, fauna, humans and their interrelationships (ISO 14001:2015).
Environmental event	Refers to all incidents that are not classified as an environmental legal contravention - incident and/or an environmental legal contravention – incident in terms of the OHD when the classification criteria are applied.
Environmental Impact	Change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects (ISO 14001:2015).
Environmental Incident	An unplanned event that could, or does result in an environmental impact.
Environmental legal contravention – incident	An incident where a provision of environmental legislation (national, provincial, or local) and/or condition of an environmental approval (for example, environmental authorisation, water use license, waste licence, licence in terms of the National Forests Act) or any other legal document issued in terms of environmental legislation is contravened. (An environmental legal contravention – incident is considered a breach in terms of compliance reporting).

CONTROLLED DISCLOSURE

When downloaded from the document management system, this document is uncontrolled and the responsibility rests with the user to ensure it is in line with the authorised version on the system.

No part of this document may be reproduced without the expressed consent of the copyright holder, Eskom Holdings SOC Ltd.

Definition	Explanation
Environmental legal contravention - incident in terms of the OHD	These are specific cases of environmental legal contravention- incidents that are considered to be of very high significance in terms of its environmental impact and/or Eskom in that they have a material business impact and illustrate a significant failure of business systems. Within the above principles they are identified in terms of the criteria specified in the Environmental Incident Management Procedure (240-133087117)
Hydrocarbon spill	Refers to the release of liquid petroleum hydrocarbon (oil, diesel, jet fuel, etc.) spillage into the environment (includes soil and water) which could or does result in environmental damage, and/or pollution or degradation.
NEMA section 30 incidents	An unexpected, sudden and uncontrolled release of a hazardous substance, including from a major emission, fire or explosion, that causes, has caused or may cause significant harm to the environment, human life or property. Will be managed as per requirements of Section 30 of NEMA
NWA section 20 incident	Includes any incident or accident in which a substance - a) pollutes, or has the potential to pollute, a water resource or b) has, or is likely to have, a detrimental effect on a water resource. . Will be managed as per requirements of Section 20 of the NWA
Repeat Environmental incident	Any environmental incident where there is clear evidence that the incident is of the same type and with the same cause(s) within the same OU/BU.
Repeat Environmental legal contravention – incident	An environmental legal contravention – incident that occurred within 12 months of the previous environmental legal contravention – incident, occurred within the same OU/BU, is related to the same section of legislation and/or license condition, has the same root cause and the corrective and preventative actions identified have been implemented by the agreed timeframes such that there was an opportunity to prevent the present environmental legal contravention – incident. Note: The process flow provided in Appendix A of the Environmental Incident Management Procedure (240-133087117) must be used to determine repeat environmental legal contravention – incidents.
Wildlife	Refers to birds, wild-game, non-domesticated animals, marine and freshwater fish. Note: this definition is only applicable to the incident management procedure in order to enable practitioners to categorise biodiversity incidents into wildlife or vegetation types.

2.7 Abbreviations

Abbreviation	Explanation
AEL	Atmospheric Emission License
CIR	Central Incident Register
EICC	Environmental Incident Classification Committee
EIA	Environmental Impact Assessment
EMS	Environmental Management System
Environmental Sub-committees	Land, Air, Water and Waste Sub-committees
EWT	Endangered Wildlife Trust
DWS	Department of Water and Sanitation

CONTROLLED DISCLOSURE

When downloaded from the document management system, this document is uncontrolled and the responsibility rests with the user to ensure it is in line with the authorised version on the system.

No part of this document may be reproduced without the expressed consent of the copyright holder, Eskom Holdings SOC Ltd.

Abbreviation	Explanation
INO	Initial Notification Occurrence
NEMA	National Environmental Management Act
NWA	National Water Act
SAP	Systems, Applications, and Products in Data Processing
SAP EH&S	SAP Environmental Health and Safety (system)
SEAC	Station Environmental Action Committee
QIM	Quality Issue Management
OHD	Contravention in terms of the Operational Health Dashboard

2.8 Roles and Responsibilities

2.8.1 General Manager

- Accountable for providing direction and adequate resources for the implementation of this procedure.

2.8.2 Heads of departments/ Heads of function/ Supervisors

- Communicate procedure with employees to ensure awareness
- Ensure adherence to this procedure
- Ensure that all environmental incidents are reported to environmental section within 8 hours
- Initiate investigation through the INO process.
- Ensure that all the incidents are investigated within specified time frames

2.8.3 Environmental Manager

- Provide guidance with regards to compliance obligations in terms of any activity which has resulted in an environmental incident to enable decision making process for internal and external reporting.
- Verify and close environmental incidents on SAP EH&S after the investigation is completed
- Present incidents to EICC when an incident is classified as a Legal Contravention – incident or a Legal Contravention – incident in terms of OHD
- Report to management on incident investigation quality and status as well as corrective action closure status.

2.8.4 Environmental advisor/ Officer

- Ensure all environmental incidents and or events are reported internally within 24 hours of occurrence.
- Ensure that all incidents reportable to the authorities are reported within 24 hours of occurrence and detailed reporting as per NEMA section 30 and NWA S20 are done within 14 days from the date of initial notification.
- Share lesson learned and share with all concerned parties
- Collect all the necessary data relating to the incident.

CONTROLLED DISCLOSURE

When downloaded from the document management system, this document is uncontrolled and the responsibility rests with the user to ensure it is in line with the authorised version on the system.

No part of this document may be reproduced without the expressed consent of the copyright holder, Eskom Holdings SOC Ltd.

- Capture the incident on SAP within specified time frames.
- Keep and update on-site incident register.
- Provide support in incident investigations.
- Track corrective action closure and ensure effective implementation.
- Conduct awareness on this procedure with employees and contractors.

2.8.5 Employees and contractors

- Report all the environmental incidents to environmental department within 8 hours or end of shift.
- Conduct incident investigations as assigned by production manager within 30 days of when the incident occurred.

2.9 Process for Monitoring

- Weekly incident report presented at production meeting where additional incidents can be reported and investigations gets assigned to responsible person.
- Weekly CARAT principle check done by environmental officer.
- *Monthly presentations of financial year incidents at SEAC meeting. Incidents are trended per type including but not limited to hydrocarbon spillages, pipe leaks, biodiversity incidents etc.*
- *Yearly presentation of incidents at EMS management review meeting. Incidents are trended as per root cause (using IBI tools), responsible function and per type.*
- Mid-year and Year-end reviews conducted by Centre of Excellence: Risk and Assurance.

2.10 Related/Supporting Documents

- 32-95 – Eskom Procedure Manual for Perform Occupational Health and Safety Management and Environmental Management : Conduct EH&S Incident Management
- 240-133087117 – Environmental incident management procedure
- PS/179/001 – Occurrence management process

3. Environmental incident management process

3.1 Incident reporting

- a) All environmental events or incidents shall be reported in writing, within 8 hours of occurrence, to the Environmental Officer/Advisor/Manager.
- b) The person in charge of the section/department (i.e. Supervisor or Head of Function) shall be responsible for reporting the event or incident.
- c) The responsible manager/supervisor shall complete the *incident* report (240-151257094) and send it to Environmental department within 12 hours of discovery.
- d) For all oil spillages an Oil spill classification form (Document Number 240-47176039) should be completed in order to classify the spillage and determine follow-up action and reporting need.
- e) Wildlife incidents will be recorded in the "Environmental incidents/events register" (F/240/036) for record keeping and will be reported to EWT (e-mail: wep@ewt.org.za) to register on CIR and to classify, track and investigate. Reference number obtained from EWT will be noted in the on-site register.

CONTROLLED DISCLOSURE

When downloaded from the document management system, this document is uncontrolled and the responsibility rests with the user to ensure it is in line with the authorised version on the system.

No part of this document may be reproduced without the expressed consent of the copyright holder, Eskom Holdings SOC Ltd.

- f) The Environmental officer will inspect the reported incident and prioritize the incident as per the "Consequence and Priority Rating Table" found in the Environmental incident management procedure (240-133087117). Insignificant incidents will be recorded in the "Environmental incidents/events register" (F/240/036) as an event for noting. All other incidents will be captured on SAP EH&S within 24 hours and a populated flash report will be sent out to management within 48 hours to all relevant personnel.
- g) *Incidents reported in monitoring reports will be captured by the environmental officer on the SAP EH&S system within 48 hours of receiving the final report.*
- h) *When an incident occur that triggers section 30 of the NEMA, section 20 of the NWA or where a license condition has been contravened, a notification will be sent to the relevant governmental authorities. (See Environmental Incident Management Procedure, 240-133087117, Appendix D for guidance).*

3.2 Initiating of investigations

- a) The person in charge of the plant/product/service/substance (i.e. Supervisor or Head of Function), shall report the incident to the Production Manager, via the INO process (form number 240-151257094) form for further investigation.
- b) All investigations will be initiated within 72 hours of the incident occurring.

3.3 Incident investigations

- a) All Environmental incidents or incidents that have the potential to pollute the Environment will be investigated by a lead investigator and the team identified by production manager via the INO process, the process and corrective actions is tracked on the QIM system as described in the Matimba Occurrence Management Procedure (PS/179/001)
- b) Contractor's site: Environmental incidents that occurred in Contractor's sites will be managed the same as all other environmental incidents caused by Matimba's operations.
- c) Investigations will be initiated as soon as practicably possible (preferably within 24 hours from occurrence) but not later than 72 hours after the incident occurred.
- d) Investigations will be completed within 30 days from the day the incident occurred.
- e) Investigations of incidents prioritized as low or moderate can be an immediate closure, trended or closed by completing the "Close out report Environmental issue" (240-147842503) with the Environmental Manager as the closeout manager.
- f) Incidents prioritized as High or Extreme needs to be closed in the same manner and additionally be presented at the weekly Production meeting with the General Manager as close out manager.

3.4 Corrective actions

- a) After an incident has been investigated corrective and preventative actions will be raised on the QIM system (by investigation leader) and copied on to the SAP EH&S system (by the environmental officer) to address the root cause of the incident and to rectify any environmental harm that was caused.
- b) Closure of these actions will be tracked on a weekly basis at the production meeting.

3.5 Remedy of incidents

- a) The HOF responsible for the plant/activity which has resulted in the event/incident, must within reasonable time take all reasonable measures to prevent incident from causing

CONTROLLED DISCLOSURE

When downloaded from the document management system, this document is uncontrolled and the responsibility rests with the user to ensure it is in line with the authorised version on the system.

No part of this document may be reproduced without the expressed consent of the copyright holder, Eskom Holdings SOC Ltd.

further harm to the environment; thus include cleaning and rehabilitation of the area affected.

- b) Temporary mitigation measures should be put in place to prevent any further harm to the environment if the incident occurs again while the root cause is being identified and corrected.
- c) Cost for remedy and rehabilitation of affected area should be made available by the responsible Head of Function.

3.6 Incident recording

- a) All significant (as determined through methods mentioned above and in Environmental Incident Management Procedure, 240-133087117) environmental incidents should be captured on SAP EH&S within 24 hours of occurrence.
- b) Environmental costs: this will be all costs that are quantifiable, example Oil spillage where the contractor is appointed specifically to clean the spill or to rehabilitate the site. Other cost example break down of the plant that might lead to Environmental incident will be captured and monitored as part of Environmental accounting.

CONTROLLED DISCLOSURE

When downloaded from the document management system, this document is uncontrolled and the responsibility rests with the user to ensure it is in line with the authorised version on the system.

No part of this document may be reproduced without the expressed consent of the copyright holder, Eskom Holdings SOC Ltd.

3.7 Trending of incidents

- a) Incidents can be trended in the following categories including but not limited to:
- Type (hydrocarbon spillage, biodiversity, emissions etc.)
 - Responsible functions (Maintenance, engineering, risk etc.)
 - Root cause (according to the IBI barriers identified in investigations)
- b) As a minimum the following trends need to be done:
- Monthly presentation of incidents of current financial year trended by type in the SEAC meeting
 - Yearly presentation of incidents trended by responsible functions and root cause at EMS management review.
- c) Actions arising from trending incidents can include: Focused awareness sessions, training and investigations into system or physical changes.

3.8 Sharing of lessons learned

- a) Lessons learned for all Matimba incidents which have been fully investigated will be communicated to all employees on a monthly basis.
- b) Lessons learned from legal contraventions that occurred at other Business Units will be shared to all employees as and when required, and to management during business review as information is made available.
- c) Lessons learned should be uploaded on the SAP EH&S system for all incidents with a rating of moderate and higher.

4. Record(s)

Type of record	Retention time	Responsibility
SAP EH&S	Life of the station	Eskom Sustainability SAP EH&S administrators
QIM	Life of the station	Matimba Risk and Assurance Manager
Environmental incidents/events register (F/240/036)	Life of the station	Environmental Management Department

5. Addenda / Appendix

Not Applicable

6. Acceptance

This document has been seen and accepted by:

Name	Designation
Dist List MTP_MP&S	MP& S Band – Managers and Supervisors
B Moeng	Environmental Senior Advisor

CONTROLLED DISCLOSURE

When downloaded from the document management system, this document is uncontrolled and the responsibility rests with the user to ensure it is in line with the authorised version on the system.

No part of this document may be reproduced without the expressed consent of the copyright holder, Eskom Holdings SOC Ltd.

Name	Designation
M Sinthumule	Environmental Officer
H Ramahlare	Environmental Officer
S. Sebola	Environmental Officer

7. Revisions

Date	Rev.	Compiler	Remarks
	0	Precious Mohlala	Original
January 2010	1	Sarina More	To align with Co-operate procedure
July 2010	1.1	Sarina More	Changes on sub section 5.1.4, 5.1.5 , and section 11
July 2010	1.2	Freddy Nong	Appendix A: Include estimated cost
October 2012	2	Tshifhiwa Matamela	Head office instruction to align the procedure with SAP EH&S
January 2014	3	Tshifhiwa Matamela	Findings from EMS Internal Audits November 2013
January 2015	4	Tshifhiwa Matamela	Findings from NOSA Pre audit Report November 2014
December 2018	5	Elmien Mocke	Development of the Environmental Incident Management Procedure 240-133087117. Changes made to points 1, 2, 3 and 4
January 2019	6	Elmien Mocke	Updating of process for reporting and investigating incidents. Changes made to points 1, 2, 3 and 4
February 2020	7	Elmien Mocke	Findings from midyear SAP EH&S data review. New template. Changes made to points 2.9 and 3.

8. Development Team

Elmien Mocke

9. Acknowledgements

Not Applicable

CONTROLLED DISCLOSURE

When downloaded from the document management system, this document is uncontrolled and the responsibility rests with the user to ensure it is in line with the authorised version on the system.

No part of this document may be reproduced without the expressed consent of the copyright holder, Eskom Holdings SOC Ltd.