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Plan for the Management of Occupational Hygiene Programme at Majuba Projects


Sept 2021

Revision 1

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APPROVAL'S PAGE

DIVISION: GROUP CAPITAL DIVISON
BUSINESS/OPERATING UNIT: MAJUBA PROJECTS
PLAN FOR THE MANAGEMENT OF OCCUPATIONAL HYGIENE PROGRAMME
01/09/2021 – 01/09/2022

This Operational Plan has been seen and accepted by:

Name	Designation
Carel Stoop	Programme Manager Majuba Projects
Nielesh Maistry	Project Manager Majuba Refurbishment
Themba Khumalo	Project Manager Majuba Rail Project
Lux Mphela	Safety Manager Majuba Projects

Recommended by:


.....

Date: 29/09/2021

O Toboti

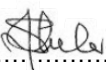

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Date: 29/09/2021

M Ramoleko

Occupational Hygiene Practitioners

Verified by:



.....

Date: 05/10/2021

L Mphela

Safety Manager

Approved:


.....

Date: 05/10/2021

C Stoop

Programme Manager

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1. INTRODUCTION

1.1. Scope of the Plan for the Management of Occupational Hygiene (OH) Programme

This document applies throughout all Divisions of Eskom Holdings SOC Limited and its subsidiaries and contractors, including any joint ventures in which Eskom have a controlling interest.

The Occupational Hygiene Program provides information to the business, to allow for informed decision-making regarding exposure to and control measures for hazardous agents in the workplace.

1.2. Purpose

The Occupational Hygiene Programme provides information to departmental supervisors and workers to allow for informed decision-making regarding exposure to hazardous agents in the workplace.

This program outlines how worker exposure hazards will be addressed in all the GCD Majuba Projects employees, including the anticipation, identification, evaluation (measurement), and control (including personal protective equipment programmes) of the hazards. Interpretation of technical data and conducting research which assist in the development of guidelines and procedures that support workplace health and wellness are also an integral part of the Occupational Hygiene Programme.


1.3. Supporting Programs

There are certain occupational hygiene related hazards that may require hazard-specific management. For these hazards, additional programs may be developed and function in conjunction with this Occupational Hygiene Program.

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This program includes, but are not limited to the:

- Indoor Air Quality Programme;
- Illumination Programme
- Ergonomics Programme

1.4.Supporting Documentation


This Plan should be read in conjunction with the following documents:

1. 32-520	Occupational Health & Safety Risk Assessment Procedure
2. 240-75567900	Manual for Internal Quality Assurance Management of the Eskom Occupational Hygiene Approved Inspection Authority
3.	Occupational Health and Safety Act, and regulations
4.	Applicable South African National Standards (SANS)
5.	Department of Employment and Labour Occupational Hygiene Approved Inspection Authority Requirement
6.	South African National Accreditation System (SANAS) requirements
7.	South African Institute for Occupational Hygiene Requirements
8.	OHS Strategy
9.	OHS plan
10.	OH Plan

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2. ORGANIZATIONAL COMMITMENT

2.1. Business overview

Group Capital Divisions of Eskom Holdings SOC Limited and its subsidiaries are committed to Zero Harm and will conduct business with respect and due care for the environment and people.

2.2. Majuba Projects OHS mandate

To direct a core group of specialist skills in the areas of Safety, Health and Environment (SHE) to develop, facilitate and monitor the implementation Occupational Hygiene Programmes and to provide overall assurance to the business that risk and opportunities in these areas being managed.

3. OCCUPATIONAL HYGIENE PROGRAMME

Occupational Hygiene Programme (OHP) are programme devoted to the recognition, evaluation and control of those environmental factors, arising in or from the work place that may cause illness, injury, or discomfort.

The main objective of the OHP is to help reduce the risk of hazardous exposures, ensure regulatory compliance and to improve working conditions. Appropriate occupational hygiene practices needs to be applied to the various departmental areas in accordance with the Occupational Health & Safety Act in order to fulfil this requirement.


The Occupational Hygiene Programme clearly defines and stipulates the responsibilities of all workplace parties involved in its development, administration and implementation of the program.

Occupational Hygiene Programme within the workplace should be an integral part of the overall company strategy for a healthy workplace. Occupational Health and safety legislation and other workplace policies or programs can provide a basis for a healthier workplace.

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4. ASPECTS OF THE MANAGEMENT OF OCCUPATIONAL HYGIENE (OH) PROGRAMME

The plan for the management of occupational hygiene programme as outlined below provides the actions that will be taken by Majuba Projects OHS to evaluate, monitor and improve the occupational hygiene programme within the business.

4.1 OCCUPATIONAL HYGIENE HAZARD IDENTIFICATION AND RISK ASSESSMENT

It is a legal requirement for the employer (Carel Stoop) to conduct an Occupational Hygiene HIRA for all regulated stress factors as outlined in the regulations referred to below:

- OH HIRA for hazardous chemical agents, including dust (as per the Regulations for Hazardous Chemical Agents – Regulations 5).
- OH HIRA for Noise exposure at the workplace (as per the Noise-Induced Hearing Loss Regulations – Regulation 6).


The above Regulations state that an employer (Carel Stoop) or self-employed person shall after consultation with the relevant health and safety representative or relevant health and safety committee, cause an immediate assessment to be made and thereafter at intervals not exceeding two years, to determine if any employee may be exposed to occupational hazards by any route of intake.

Eskom holdings SOC limited have developed an Occupational Health & Safety Risk Assessment Procedure (32-520) which is aimed to assist with the identification of all hazards, including Occupational Hygiene Hazards. Further details with regards to the Occupational Hygiene hazards can be identified by following the Occupational Hygiene Hazard Identification and Risk Assessment (OH HIRA) Work Instruction, (Issue-based/Task-specific Assessment, Document Identifier: 240-114036246)

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4.2 MONITORING (MEASUREMENT) PROGRAMMES

It is a legal requirement for the employer (Carel Stoop) to conduct a monitoring for all regulated stress factors as outlined in the regulations referred to below:

- Lighting (as per the Regulations for Environmental Regulations for Workplaces – Regulation 3 and SANS 10114).

The Department of Employment and Labour has prescribed the Occupational Exposure Sampling Strategy Manual (OESSM) and HSG 173: Monitoring Strategies for Toxic Substances (previously EH 42), to ensure proper evaluation of employee exposures which must be representative of the employees exposure. This will be achieved by proper assessing, interpreting and commenting on valid quantitative exposure measurements. OESSM prescribes the number of samples to collect and the manner in which the exposed employees should be selected in chapters 3, chapter 4 and Technical Appendix A of this manual. Such sample size shall be chosen for the top 10% of the group at the 95% confidence level (control limit HCS; OEL- CL) and for the top 10% of the group at the 90% confidence level (recommended limit HCS; OEL- RL). Exposure measurement (monitoring) should be based on monitoring strategies (OH Programs), derived from task specific OH HIRA Health data.

The complete guideline and manual can be viewed on the link below:

HSG 173: https://hyperwave.eskom.co.za/0x936e3246_0x07b849b1


OESSM: https://hyperwave.eskom.co.za/0x936e3246_0x05014c17

It is not proper to only take random samples when developing a monitoring programme. The programme should rather be based on Homogeneous (similar) Exposure Groups (HEG/SEG) and extreme care must be exercised to ensure the HEG/SEG. For examples, when a certain plant controller is complaining about the level of exposure at his work place, the department should be in a position to link the employee to a particular exposure result by producing results from the samples collected from the employee or of the HEG which he belongs to.

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Special attention must be given to the OEL, which the hazard belongs to, whether it is a control limit, or from a recommended limit. Control limit substances should at least be measured on an annual basis while recommended limit substances should be measured bi-annually.

For noise exposure assessments, the Department of Employment and Labour has prescribed South African National Standards (SANS) 10083 ([available on Eskom e-Standards](#)) which details the method for the assessment (measurement) and part of the standards, clauses 9, 10 and 11 defines the representativeness.

SANS 10083: 2013 – Clause 9: Preparation for assessment of measurement area

- The purpose of this preparation procedure is to determine the boundaries of noise zones for purposes of demarcation.
- Obtain a plan of the measurement area or draw a dimensioned sketch. Show the relevant positions of all equipment or processes that create noise and indicate adjacent reflecting and absorbing surfaces. Use this plan or sketch as a basis for zoning the area.
- Carry out a preliminary survey of noise levels in the entire measurement area, using short duration $L_{Req,T}$ measurements. Identify work areas, operators' positions and any other location that can be accessed, where the 8 h noise rating level ($L_{Req,8h}$) equals or exceeds 85 dBA.
- Use the information obtained from the above survey to determine preliminary noise zone boundaries. Indicate on a plan or sketch the preliminary boundaries of noise zones where the 8 h rating level ($L_{Req,8h}$) equals or exceeds 85 dBA. Ensure that every area, or location that can be accessed, where the 8 h rating level ($L_{Req,8h}$) equals or exceeds 85 dBA, is included within the boundaries of a noise zone.

SANS 10083: 2013 – Clause 10 Assessment of measurement area (zoning)


The following requirements are paraphrased from clause 10 of SANS 10083: 2013.

Clause 10.1 - General industrial areas

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For each zone, the occupational hygiene practitioner must carry out a detailed survey as described by SANS 10083: 2013 clauses in 8.1 to 8.8. The occupational hygiene practitioner reporting on the noise measurements must indicate the final positions on the plan or sketch. If necessary, the occupational hygiene practitioner must adjust the current noise zone boundaries and indicate the final positions on the plan or sketch. Indicate the 8 h rating levels ($L_{Req,8h}$) of relevant accessible areas and locations that equal or exceed 85 dBA.

NOTE 1: For purposes of risk assessment, noise zones may be further divided such that the difference between maximum and minimum estimated values is less than 10 dB.

NOTE 2: It is recommended that a sign or marking of the 8 h rating level ($L_{Req,8h}$) for the appropriate zone be displayed in a prominent position.

Clause 10.2 - Procedure for areas where gunshots, explosive events or any other short-duration high-energy impulse events

Deem any area, in which such activities occur, as a noise zone where hearing conservation measures in accordance with clause 13 and audiometric tests in accordance with annex C are applicable. Majuba Projects and its contractors do not partake in any activities listed in this clause however should any scope related to listed events is established, conformance will be enforced and closely monitored.

Clause 10.3 - Procedures for drivers' cabins of vehicles and operators' positions for machinery and equipment

10.3.1 Measurement procedures


Determine the rating level in accordance with 8.6 over sufficient measurement time intervals such that all significant variations of noise levels at the operator's position are measured and included.

Ensure that during the measurement time interval, the noise that is characteristic of the specific work area and that is representative of the activities performed by the employee, does actually occur.

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The microphone positions and operating conditions are given in 8.3 and 10.3.2.

Majuba Projects will ensure compliance should its contractors embark on such activities.

10.3.2 Operating conditions

Determine the rating level under normal operating conditions and detail these conditions in the test report.

NOTE 1: For measurements where the employee moves around continuously, or is operating a vehicle, it is recommended that the noise exposure be determined in accordance with annex D.

NOTE 2: For further information on measurement positions and operating conditions, see the references in annex D.

SANS 10083:2013 – Clause 11 Reassessment of measurement area (rezoning)

Where there are changes that have occurred (for example, changes in production processes, machinery, and position of large surfaces, or a combination of these) that could result in a change in or redistribution of noise levels, or if there is any suspicion that the previous assessment is no longer valid, it is necessary to reassess the measurement area.

Where there is a reduction in noise levels, reassessment could result in the re-zoning of areas previously classified as noise zones. Conversely, owing to the aging and normal wear and tear of equipment, noise levels may increase and it is therefore advisable that the noise measurements be repeated at intervals not exceeding two years.

Although there are no specific requirements for re-assessment of the areas assessed in accordance to the requirements set out in the regulations listed below, it is recommended that an internal programme should specify the requirement for reassessment.


These regulations for other stressors do not specify the requirements for the re-assessment of the stressors;

- Lighting (as per the Regulations for Environmental Regulations for Workplaces – Regulation 3 and SANS 10114).

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4.3 REMEDIAL ACTIONS FOR OH PROGRAMME

It is a legal requirement for the employer (Carel Stoop) to ensure control of all regulated stress factors as outlined in the regulations referred to below:

- Lighting (as per the Regulations for Environmental Regulations for Workplaces – Regulation 3 and SANS 10114).

The control of exposure is the most important focal point for any occupational hygiene programme as it ensures that the risks are reduced to as low as reasonably possible to prevent Occupational illness/disease. This is in line with Eskom's Zero Harm value and will demonstrate that Eskom cares for its employees.

It must however be noted that these requirements are not only limited to the occupational hygiene stressors listed above as Section 8, of the Occupational Health and Safety Act (OHS Act No 85 of 1993), clearly stipulates the responsibility of every employer (Carel Stoop) to provide and maintain a working environment that is safe and without risk to the health of his employees.

All reports that have identified risk factors must also recommend remedial actions to reduce the risks to levels as low as reasonably practicable. The recommendations must be followed by an action plan that has specific

4.4 INFORMATION AND TRAINING PROGRAMME


It is a legal requirement for the employer (Carel Stoop) to ensure that, every employee is, as far as is reasonably practicable, conversant with the hazards to his health and safety attached to any work which he has to perform, any article or substance which he has to produce, process, use, handle, store or transport and any plant or machinery which he is required or permitted to use, as well as with the precautionary measures which should be taken and observed with respect to those hazards as outlined in the act/regulations referred to below:

- Section 13 of the Occupational Health and Safety Act (Duty to inform)

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It is also requirement from the employer (Carel Stoop) to ensure that the employee is adequately and comprehensively informed and trained, as well as thereafter informed and trained at intervals as may be recommended by that health and safety committee, with regard

- to;
- (a) the contents and scope of legislation governing that hazard;
 - (b) the potential source of exposure;
 - (c) the potential risks to health caused by exposure;
 - (d) the measures to be taken by the employers to protect an employee against any risk from exposure;
 - (e) the precautions to be taken by an employee to protect himself or herself against the health risks associated with the exposure, including the wearing and use of protective clothing and respiratory protective equipment;
 - (f) the necessity, correct use, maintenance and potential of safety equipment, facilities, and engineering control measures provided;
 - (g) the necessity medical surveillance;
 - (h) the importance of good housekeeping at the workplace and personal hygiene;

It is important to note that it is also a legal requirement for an employer or a self-employed person to ensure that he himself or she herself or any person who in any manner assists him or her in the carrying out or the conducting of his or her business, have the necessary information and has undergone sufficient training in order for him or her to identify the potential risks and the precautions which should be taken.


4.5 PERSONAL PROTECTIVE EQUIPMENT PROGRAMME

Personal protective equipment should be the last resort and used as a temporary measure while more permanent controls are investigated. For this reason, a business unit must be able to substantiate that other measures of control are being investigated.

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Where personal protective equipment is being used, it is a legal requirement for the employer (Carel Stoop) to ensure that the employee is provided with suitable personal protective equipment and protective clothing.

The employer also shall ensure that where personal protective equipment is provided,

- (a) the relevant equipment is capable of controlling the exposure to below the OEL for the relevant hazard;
- (b) the relevant equipment is correctly selected and properly used;
- (c) information, instructions, training and supervision which is necessary with regard to the use of the equipment is known to the employees; and
- (d) the equipment is kept in good condition and efficient working order.

The employer shall, as far as is reasonable practicable, -

- (a) avoid issuing any used personal protective equipment to an employee, unless the relevant protection equipment is decontaminated and sterilized;
- (b) provide separate containers or storage facilities for personal protective equipment when not in use; and
- (c) ensure that all personal protective equipment not in use is stored only in the place provided therefor.

4.6 STATURY REPORTING TO THE STAKEHOLDERS

4.6.1 Annual Silica Exposure Reports:


The Department of Employment and Labour published a Government Notice instructing all industries handling, manufacturing and producing products that may cause exposure to silica dust to submit annual reports indicating the extend of silica dust exposure as communicated by Government Notice No. 66 issued on the 05th of February 2010.

All Eskom business units are required to submit their reports to Sustainability Systems – Occupational Hygiene and Safety Department for consolidation and verification before the reports are send to the Department of Employment and Labour. These submissions must be done annually before every 30th of January (to allow consolidation and verification before the 31st of January submission deadline).

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4.6.2 Bi-annual (6-monthly) AIA Returns:

The Department of Employment Labour also published a Government Notice instructing all Approved Inspection Authorities to submit bi-annual (6-monthly) reports indicating the activities that were conducted by that AIA during the preceding 6-months. The reporting requirements were further outlined in the AIA requirements issued during October 2012.

Eskom, as an AIA must submit one report bi-annually. All business units are required to submit their reports to Sustainability Systems – Occupational Hygiene and Safety Department for consolidation and verification of the reports. Only one organisational report should be submitted to the Department of Labour. These submissions must be done bi-annually before every 30th of March and every 29th of September. This to allow enough time for consolidation and verification before the 31st March and 30th September submission deadline.

An Approved Inspection Authority (AIA) is there to perform inspection, monitoring and testing of exposure control installations for occupational hygiene stressors, which are regulated as per regulations outlined in clause 4.2 of this programme. Inspection bodies that are not AIA may not perform the activities under the regulations listed by the first 5 bullets outlined in clause 4.2.


The Department of Employment and Labour (DoEL) maintains and updates a list of AIAs that are approved by them and it can be obtained from the DoEL's website. Eskom Holdings SOC Ltd has been approved as an Approved Inspection Authority to perform the activities under the regulations listed by the first 5 bullets outlined in clause 4.2.

This approval allows the Occupational Hygiene practitioners who form part of the Eskom OH AIA to conduct monitoring of regulated stressors, as part of that SANS 17020:2012 accreditation (General criteria for the operation of various types of bodies performing inspection) with the South African National Accreditation System (SANAS). This SANS 17020:2012 accreditation is a Department of Labour

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requirement applicable to all OH AIA's in South Africa with specific reference to the performance of regulated activities, as promulgated in the Occupational Health and Safety Act.

Only certain individuals who meet the DoEL's requirements have been authorised to perform such activities under the umbrella of Eskom Holdings' Approved Inspection Authority using the visual organogram. Eskom OH AIA has demonstrated compliance with the requirements of SANS 17020:2012 during the annual SANAS assessments which are conducted in order to get SANS 17020 accredited and get approval from DoEL to work as an OH AIA.

Eskom is committed to Zero Harm and everyone is required to continue ensuring that work is done in a safe and healthy manner.

4.7 REVIEW THE EFFICIENCY OF THE REMEDIAL ACTIONS FOR OH PROGRAMME

The areas where control measures were implemented must be re-evaluated to assess the effectiveness of the control measures that were implemented. Where gaps were identified in the programmes, short-term remedial actions must be put in place to allow for speedy compliance. Were the control measures have improved the programme significantly; a re-evaluation of the OH program should be done.

4.8 REVIEW THE PLAN FOR THE MANAGEMENT OF OH PROGRAMME


The plan for the management of Occupational Hygiene Programme will be reviewed every 2 - years by the respective business unit.

- To ensure its contents continue to meet regulatory and Eskom requirements;
- To evaluate the effectiveness of the listed process/program; and,
- To evaluate the roles and responsibilities within the program.

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5. CRITICAL SUCCESS FACTORS

Majuba Projects will have occupational hygiene programme by the end of the 2021/2022 financial year.

6. ABBREVIATIONS

Abbreviations used in this document are clarified in Table 1.


TABLE 1: ABBREVIATIONS

AIA	Approved Inspection Authority
BU	Business Unit
EAL	Eskom Academy of Learning
DoEL	Department of Employment and Labour
EXCO	Executive Committee
GCD	Group Capital Division
KPA	Key Performance Area
KPI	Key Performance Indicator
OH	Occupational Hygiene
OHS	Occupational Hygiene and Safety
OU	Operating Unit
PPE	Personal Protective Equipment
SANAS	South African National Accreditation Systems
SAIOH	South African Institute for Occupational Hygiene
SHE	Safety, Health/hygiene & Environment
SS	Sustainability Systems

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7. GLOSSARY OF TERMS

The glossary of terms used in this document is listed in Table 2.

TABLE 2: GLOSSARY OF TERMS

Term	Description
Employee	An person employed by Eskom as defined in its conditions of service
Medical Surveillance	A planned programme of periodic examination (which may include clinical examinations, biological monitoring or medical tests) of employees by an occupational health practitioner or, in prescribed cases, by an occupational medicine practitioner.
Occupational Health	This includes occupational hygiene, occupational medicine and biological monitoring
Occupational Hygiene	The anticipation, recognition, evaluation and control of conditions arising in or from the workplace, which may cause illness or adverse health effects to persons.
Occupational Medicine	The prevention, diagnosis and treatment of illness and adverse health effects associated with a particular type of work.
Zero Harm	Ensuring that harm is not afflicted upon the environment, Eskom's assets, employees, contractors as well as members of the public affected by our operations, infrastructure and operational activities to ensure protection of human lives, environmental duty of care and protection of assets.

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Occupational Hygiene Programme

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APPENDIX A: OH PROGRAMMES

SURVEY	DEPARTMENT	AREA	LAST SURVEY DATE(S)	NEXT SURVEY DUE DATE(S)	FREQUENCY	RESPONSIBLE PERSON	LEGAL REQUIREMENTS / BEST PRACTICE / COMMENTS
Occupational Hygiene-HIRA	All exposed persons	Majuba Refurbishment Projects	July 2020	July 2022	2 yearly	Site Project Manager	Occupational Hygiene- HIRA will be conducted in accordance with the requirements of the Occupational Health and Safety Act, Act No 85 of 1993.OH-HIRA will include illumination, indoor air quality, ergonomics, Noise and HCA where applicable. As part of the OH-HIRA, Occupational Hygiene stressors are also assessed and included as part of the OH-HIRA. Separate reports may be compiled for regulated hazards which are specified in the following regulations referred to below: <ul style="list-style-type: none">• OH-HIRA for hazardous chemical agents, including dust (as per the Regulations for Hazardous Chemical Agents – Reg 5).• HRA for Noise exposure at the workplace (as per the Noise-Induced Hearing Loss Regulations – Regulation 6).
		Majuba Rail Projects	Nov 2019	Nov 2021	2 yearly	Site Project Manager	

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SURVEY	DEPARTMENT	AREA	LAST SURVEY DATE(S)	NEXT SURVEY DUE DATE(S)	FREQUENCY	RESPONSIBLE PERSON	LEGAL REQUIREMENTS / BEST PRACTICE / COMMENTS
Illumination	All exposed persons	Majuba Refurbishment Projects	Feb 2021	Feb 2023	2 yearly	Site Project Manager	Illumination surveys will be conducted in accordance with the requirements of the Environmental Regulations for Workplaces, Regulation 3, OHSAct 85 of 1993 and method described in SANS 10114:2005.
		Majuba Rail Projects	Nov 2019	Nov 2021	2 yearly	Site Project Manager	

SURVEY	DEPARTMENT	AREA	LAST SURVEY DATE(S)	NEXT SURVEY DUE DATE(S)	FREQUENCY	RESPONSIBLE PERSON	LEGAL REQUIREMENTS / BEST PRACTICE / COMMENTS
IAQ	All exposed persons	Majuba Refurbishment Projects	Feb 2021	Feb 2023	2 yearly	Site Project Manager	Indoor air quality surveys will be conducted in accordance with the Environmental Regulations for Workplaces, Regulation 5, OHSAct 85 of 1993.
		Majuba Rail Projects	Nov 2019	Nov 2021	2 yearly	Site Project Manager	

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SURVEY	DEPARTMENT	AREA	LAST SURVEY DATE(S)	NEXT SURVEY DUE DATE(S)	FREQUENCY	RESPONSIBLE PERSON	LEGAL REQUIREMENTS / BEST PRACTICE / COMMENDS
Ergonomic Assessment	All exposed persons	Majuba Refurbishment Projects	Feb 2021	Feb 2021	2 yearly	Site Project Manager	
		Majuba Rail Projects	Nov 20219	Nov 2021	2 yearly	Site Project Manager	

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