	Procedure	Group Capital
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Title: **Medupi Environmental Aspects and Impacts Procedure** Document Identifier: **348-860847**

Alternative Reference Number: **200-73975**

Area of Applicability: **Medupi Power Station Project**

Functional Area: **Environmental Management**

Revision: **8**

Total Pages: **20**

Next Review Date: **October 2027**

Disclosure Classification: **Controlled Disclosure**

Compiled by	QA, Interface & Governance Review	Functional Responsibility	Authorized by
			
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Date: 01/10/2024	Date: 2024/10/02	Date: 02/10/2024	Date: 2024/10/09

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1. Introduction

Environmental aspects and impacts of the activities, products and services at Medupi Power Station Project need to be identified and assessed (in terms of significance) to enable the implementation of sound environmental management practices. This is required to fulfil requirements stipulated in the ISO 14001:2015 Standards and Construction Environmental Management Plan Rev 2, 2010 (348-681011). The procedure outlines process to be followed when identifying significant environmental impacts.

2. Supporting Clauses

2.1 Scope

Environmental aspects and impacts of the activities, products and services at Medupi Power Station Project need to be identified and assessed (in terms of significance) to enable the implementation of sound environmental management practices. This procedure applies to all existing or planned activities, products and services at Medupi Power Station Project (construction and commissioning stages), under normal, abnormal and emergency conditions, as well as to employees and contractors.

Contractors are required to provide information to the TM as per contractual/legal or other requirements, pertaining to Environmental Aspects and Impacts particular to their Scope of Works.

This Procedure specifically relates to the compilation and maintenance of a Medupi Environmental Aspects and Impacts Register, so as to determine the significant environmental aspects and associated impacts for the Medupi Project that requires specific control.

Although contractors are required to compile A&I registers as part of their scope of works and provide the information to the TM, this procedure only serves as guidance for Contractors in the compilation of their own specific Environmental Aspects and Impacts Registers.

The processes surrounding Operational Controls are specifically defined in the relevant procedures.

2.1.1 Purpose

The purpose of this document is to establish, implement and maintain a method of identifying the environmental aspects of Medupi Power Station Project activities, products and services within the defined scope of the EMS and to determine those aspects that have or can have a significant impact on the environment.

This shall ensure that the appropriate methodology is adopted:

- To identify environmental aspects related to the activities and services.
- To determine and evaluate the environmental impacts associated with the identified aspects.
- To aid in the identification, implementation and evaluation of appropriate Operational Controls pertaining to the identified environmental aspects and impacts.
- To ensure that a life cycle approach to identification of aspects and impacts is entrenched.

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2.1.2 Applicability

This document shall apply throughout Medupi Power Station Project excluding activities handed over to the client, Generation and activities undertaken by the National Transmission Company of South Africa (NTCSA).

2.1.3 Effective date

Authorisation date will be the effective date.

2.2 Normative/Informative References

2.2.1 Normative

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

- [1] 348-961711 Project Execution Plan
- [2] 348-883902 Project Quality Plan
- [3] 348-653867 Development and Change of Medupi QMS Documents
- [4] 348-883808 Document and Record Management Procedure
- [5] 348-639974 Unit Construction Work Instruction
- [6] 348-860846 Medupi Environmental Policy
- [7] 32-727 Eskom's Safety, Health, Environmental and Quality (SHEQ) Policy Poster
- [8] 348-882048 EMS Manual and scope
- [9] 348-681011 The Environmental Management Plan for the Medupi Coal-fired Power Station in the Lephalale Area, Limpopo Province – The Construction Phase, Rev 02, 2010
- [10] 348-631731 Record of Decision for the Medupi Project
- [11] 348-687483 Register of EA RoD License Permits Certificates and Servitudes for Medupi PS
- [12] 348-646829 Register of Environmental Management Documentation

2.2.2 Informative

- [1] ISO 14001:2015 EMS Management Systems
- [2] ISO 9001 Quality Management Systems - Requirements
- [3] National Environmental Management Act, 1998
- [4] National Environmental Management Biodiversity Act, 2004
- [5] National Environmental Management Waste Act, 2008
- [6] National Heritage Resources Act, 1999
- [7] The Constitution of the Republic of South Africa, 1996

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2.3 Definitions

Term	Definition
Abnormal condition	Any non-routine or unplanned event or associated activity on Medupi Power Station Project Site
Activity	An action either planned, actual (existing) or historical, that occurs or is performed by employees on behalf of the company.
Contractor	An employer who performs construction work and includes principal contractors. Contracted companies are specifically viewed as employers in their own right, as per the Occupational Health and safety Act, 1993 as amended (OHSAct).
Unit Area	A functional responsibility allocated to an Environmental practitioner based on plant area and responsible contractors.
Employee	An individual in the full-time or part-time / occasional employ of Medupi Power Station Project Team
Emergency condition	An unexpected sudden occurrence, including a major emission, fire or explosion leading to serious danger to the public or potentially serious pollution of or detriment to the environment, whether immediate or delayed.
Environment	The surrounding in which humans exist that is made up of: 1. the earth's land, water and atmosphere, 2. micro-organisms, plant and animal life, 3, any part or combination of (1) and (2) and the interrelationship among and between them and 4 the physical, chemical, aesthetic and cultural properties and conditions of the foregoing that influence human health and well being
Environmental Aspect	An element of an organisation's activity, product and service that can have a beneficial or adverse impact on the environment.
Environmental Impact	The degree of change in the environment resulting from the effect of an activity on the environment, whether desirable or undesirable.
Environmental Management Programme	A documented plan or programme which captures short, medium and long term actions aimed at addressing environmental management at the Station.
Environmental Management System	Part of an organization's management system used to develop and implement its environmental policy and manage its environmental aspects.
Frequency	The intervals at which an environmental impact occurs.
Incident	Any event that causes, or may cause, harm to persons, assets and the environment

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Legal Contravention	An illegal action (as a result of the environmental impact of the Station's activities, products or services) performed deliberately or unintentionally by the Medupi Power Station Project Team, Eskom or any contractors working on their behalf
Legal Database/Register	An online platform where the collection of all national, provincial and local legislation applicable to the project are stored.
Legal liability	Potential legislative action taken against the Medupi Power Station Project or Eskom as a result of the environmental impact of the Station's activities, products or services
Life cycle	Consecutive and interlinked stages of a product (or service) system, from raw material acquisition or generation from natural resources to final disposal.
Likelihood	The probability of an event or situation taking place
Normal condition	Any routine, planned construction or associated activities
Objectives	An overall environmental goal, consistent with the environmental policy, that an organization sets itself to achieve
Operational Control	Means and methods employed by the TM to manage identified significant Aspects and avoid or minimize Impacts. May also be referred to as Mitigating Actions or Risk Control Measures
Operational interference	When an environmental impact affects the normal or optimal activities at the Medupi Power Station Project construction site
Probability	The chance that something will happen - how likely it is that some event will take place
Receiving environment	The immediate natural surroundings which are affected (impacted) by an activity or environmental incident
Reputational risk	Any reaction from interested and affected parties that affects Medupi Power Station Project's ability to maintain sound relations with stakeholders
Severity	The magnitude of the effect on the environment should an environmental impact be realised
Significant Impact	A significant impact means a change to the environment (that might also be due to accumulative effect) that is not tolerable for life. Significance in terms of environmental management is solely based on measurements supporting changes
Targets	Targets are set in a specific timeframe to achieve your milestones and should refer to the specific reduction or enhancement (a quality/quantity goal) of an impact
Toxicity	The degree to which a substance or activity is harmful to the environment

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2.4 Abbreviations

Abbreviation or Acronym	Description
A&I	Aspects and Impacts
EA	Environmental Authorisations
EMP/r	Environmental Management Plan/Program
ECO	Environmental Control Officer
EMS	Environmental Management System
HSE	Health, Safety and Environment
ISO	International Standards Organisation
TM	Team Medupi
OHSAct	Occupational Health and Safety Act, No. 85 of 1993 as amended
RoD	Record of Decision

2.5 Roles and Responsibilities

The parties or stakeholders responsible (R) and accountable (A) or to be consulted (C) and/or informed (I) relative to the implementation and maintenance of this EMS procedure are defined in the Procedure RACI Matrix documented below.

a) Responsible

Those who do the work to achieve the task. There is at least one role with a participation type of responsible, although others can be delegated to assist in the work required.

b) Accountable (also approver or final approving authority)

The one ultimately answerable for the correct and thorough completion of the deliverable or task, and the one who delegates the work to those responsible. In other words, an accountable must sign off (approve) work that responsible provides. There **must** be only one accountable specified for each task or deliverable.

c) Consulted (sometimes counsel)

Those whose opinions are sought, typically subject matter experts; and with whom there is two-way communication.

d) Informed

Those who are kept up to date on progress, often only on completion of the task or deliverable; and with whom there is just one-way communication.

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Table 1: RACI Matrix

Process Step	General Manager	TM Construction Manager	Unit Area Manager Support Management	TM Personnel	TM SHE Manager	TM Environmental Practitioners	Contractors	ECO
Identify Aspects	A	C	R	C	A	R	R	C
Determine Impacts	I	C	R	C	A	R	R	C
Assessment of Impacts	I	C	R	C	A	R	R	I
Control and Assessment	I	C	R	C	A	R	R	I
Development of Operational Controls	I	C	C	C	A	R	R	I

2.5.1 Contractors' Responsibilities

Contractors shall undertake the following activities in line with requirements of the Employer Policies and Procedures, Medupi PS Environmental Approvals EAs/RoDs, EMPs (full register 348-687483), and applicable Legal and Other Requirements:

- Identification of aspects and impacts, followed by compilation and maintenance of an Environmental Aspects and Impacts Register, particular to their scopes of work.
- Submit Environmental Aspects and Impacts Register TM and to ensure that the project-wide Environmental Aspects and Impacts is kept and understood.
- Comply with project-wide operational controls determined and developed in line with the environmental approvals and applicable legislations.
- Review their A&I Register:
 - changes in their scope of works.
 - new processes, procedures or technologies are implemented.
 - changes in the project-wide A&I Register and/or changes in applicable legislation.
 - To fulfil requirements stipulated in the EMP/r.

2.6 Related/Supporting Documents

- Environmental Aspect and Impact Register (348-646271)
- Register of EA RoD License Permits Certificates and Servitudes for Medupi PS (348-687483)
- Register of Environmental Management Documentation (348-646829)

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3. Document Content

3.1 Process Map / Flowchart

Not applicable

3.2 Identification of Environmental Aspects and impacts

- The responsible environmental practitioner must identify and assess and capture environmental aspects and impacts arising from activities, products, and services related to Medupi PS Project activities on the Medupi Power Station Project (Construction Phase) Environmental Aspects and Impacts Register Template (348-10092514) attached as Appendix C. Once rated significant impacts (short term) will be captured on the template attached as Appendix B. For continual improvement aspects medium term aspects might also be captured on the Appendix B Template.
- For each responsible Unit/Area/Department, environmental aspects are identified based on:
 - a description of the activities that take place in the area.
 - the known impacts of the activities.
 - any changes in the Unit's activities, products or services.
- When determining the environmental aspects and associated impacts, the following must be considered:
 - potential and actual impacts.
 - positive and negative impacts.
 - direct and indirect impacts (the use of a resource such as electricity indirectly uses water and fuels which are examples of indirect impacts).
 - inputs and outputs associated with current, past and planned activities, products and services.
 - normal, abnormal and reasonable foreseeable emergency situations.
 - life cycle approach is used and improved on an ongoing basis.
 - legal database reference and changes to any legislations.
 - potential secondary and cumulative impacts.
 - the extent to which Medupi Power Station Project has control or influence over its activities, products and services.

3.3 Rating of Environmental Aspects and Impacts

Table 1 and 2 shall be used to determine the significance relative to the likelihood and consequences of an impact with the resultant Table 3 Impact Matrix.

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Table 2: Consequence Criteria

Rating	Environment
6	<ul style="list-style-type: none"> Irreversible long term environmental harm. Community outrage-potential large-scale class action. Public inquiry by government agency. Environmental licence revoked. Potential for significant legal sanctions against Eskom.
5	<ul style="list-style-type: none"> Prolonged environmental impact. High profile community concerns raise requiring significant rectification measures. Government agency inquiry. Environmental licence revoked and directive issue.
4	<ul style="list-style-type: none"> Measurable environmental harm medium term recovery. High potential for complaints and from stakeholders and community. Environmental directives issued by authorities.
3	<ul style="list-style-type: none"> Medium term recovery, immediate effect on environmental/community. Required to inform government agency (e.g. noise and dust).
2	<ul style="list-style-type: none"> Short term transient environmental and community impact some clean-up cost.
1	<ul style="list-style-type: none"> Negative impact on the environment, little to no ecological effect and no measurable impact on human health.

Not operating within the prescribed (legislative requirements) equates category 6 to global, category 5 to national, 3 and 4 to provincial and 1 and 2 to cultural consequences of identified aspects.

Table 3: Likelihood Criteria

Category	Criteria
E	<ul style="list-style-type: none"> 99% probability, or impact is occurring now, or could occur within "days to weeks"
D	<ul style="list-style-type: none"> >70% probability, or balance of probability will occur, or could occur within "weeks to months"
C	<ul style="list-style-type: none"> >20% probability, or may occur shortly but a distinct probability it won't, or could occur within "months to years"
B	<ul style="list-style-type: none"> >5% probability, or may occur but not anticipated, or could occur in "years to decades"
A	<ul style="list-style-type: none"> <5% probability

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	<ul style="list-style-type: none"> occurrence requires exceptional circumstances exceptionally unlikely, even in the long-term future only occur as a “100 year event”
--	---

Table 4: Impact Matrix

Impact Assessment Matrix						
Consequences	6	III	II	I	I	I
	5	III	II	II	I	I
	4	IV	III	II	I	I
	3	IV	III	II	II	I
	2	IV	IV	III	II	II
	1	IV	IV	III	III	III
		A	B	C	D	E
		Likelihood				

Table 5: Priority for attention

Priority	Suggested timing of treatment	Authority for continued toleration of residual risk
I	Short term. Normally within 1 month	General Manager
II	Medium term. Normally within 3 months	General Manager, Line Managers (e.g. Unit Managers, Contract Managers, Construction Managers)
III	Normally within 1 year	General Manager, Line Managers (e.g. Unit Managers, Contract Managers, Construction Managers)
IV	On-going control as part of a management system	All Staff

The priority rating of 1 is assigned in the possible impacts from the significant aspects will affect Eskom as an organisation. Any aspect which could only affect Group Capital Division is assigned a significance rating of 2. Aspect that only affect Medupi Power Station Project are assigned a significance rating of 3. Insignificant aspects which only affect departments/units or partners are assigned a priority rating of 4.

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3.4 Methodology for rating of significance of impacts

- a) Determine the likelihood of occurrence of an aspect and the consequence of an impact on the environment. Correlate the row of consequence level (1-6) with the likelihood column (A-E) and conclude on the significance.
- b) Formula used for obtaining significant impacts = likelihood score matched with consequence score e.g. Score of A1= IV implies insignificant aspect rating (green) while E6= I implies significant aspect rating (red). Negligible/very low, low, medium, high.
- c) The significance of impacts is colour coded in register to indicate significance.
- d) Significant impacts are listed and are given first priority in management programmes.
- e) A negligible, low, medium impact may escalate if not addressed and therefore must be appropriately managed.
- f) Significant impacts will be communicated to the relevant stakeholders. Monitoring programmes will be tracked continuously and potential changes to significance will be communicated immediately. Resultant changes due to the successful implementation of controls will be reviewed and communicated during Management Reviews.
- g) Significant impacts shall be used to formulate station's objective and targets which will be monitored, measured and reviewed during management reviews.
- h) Aspects and Impacts register shall be reviewed annually and/or as when required. Changes made after each review will be documented on the Aspect and Impact register cover page.
- i) The final rating of station significant aspect and impacts will be based on the pre mitigation risk rating.

3.5 Monitoring and Measurement

- Review the Project-wide Environmental A&I Register on an annual basis, but also in the following instances:
 - The occurrence of an Emergency Event.
 - Any change in Legal and Other Requirements that has significant impact to the Project.
 - Aspects and/or Impacts brought to the attention of the Environmental Department by Medupi personnel.
 - When an applicable audit/self-assessment finding arises.
 - When contracts come to an end.
 - Changes in scopes of work/activities.
- Progress on mitigation of significant Impacts shall be discussed at relevant meetings.

3.6 Records

Environmental Aspect and Impact Register (348-646271) is utilised to record necessary process data required to verify process conformity.

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4. Process for Monitoring

4.1 Key Performance Areas and Indicators

The following Key Performance Areas / Indicators (KPA's / KPI's) shall be measured, analysed and reported by the Process Owner at the frequency documented as part of the QMS measurement, analysis and improvement initiative.

Table 6: KPA's/KPI's

Key Performance Area	Key Performance Indicator	Target	Measure Frequency	Responsibility	Records
Identification of all aspects in relation to the Project	All Aspects identified	Identify Aspect and Impacts for the project. Contractors submitted their AIP's linked their scope of work. 100%	Revised Project Aspect and Impact Register and records of the contractors Aspect and Impact Register 100%	TM Environmental Department and Contractors	Aspect and Impacts Register
Assessment of all related Impacts in relation to the Project	All Aspects have at least one Impact	Determine impacts for identified aspects 100%	Annually or where applicable	TM Environmental Department and Contractors	Aspect and Impacts Register
	Impact assessments accurate in relation to Severity and Probability	Assess Impacts in relation to severity and probability 100%	As per Environmental Aspect and Impact Register and procedure	TM Environmental Department	Aspects and Impacts Register
Document Control	Retain and store records generated as a result of this document as defined in the Procedure 348-883808 "Document and records Management".	100% compliance	Annually or as required	Environmental Practitioner	As generated by the procedure

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Revision Document	of	Revision requirements in line with Medupi Procedures, 348-653867 "Development and Change of Medupi QMS Documents" and 348-883808 "Document and Record Management".	Three Yearly or when required	Annually or as required	SHE Manager / Environmental Practitioners	New revised document

4.2 Document Review and Self-Assessment

4.2.1 Document Self-Assessment

The "Process Owner" identified on the front page of this document along with departmental personnel and the project QMS Engineer shall undertake a "self-check" review of the process defined in this document at six monthly intervals, commencing from the effective date of this document, to check:

- a) the process / procedure operational integrity.
- b) process efficiency.
- c) the level of stakeholder knowledge and implementation.

Participants and results of the "self-check" review shall be documented by the Process Owner in the "Self-Assessment Checklist" (**Template No. 348-655890**) included as an Appendix to this document which shall be submitted via SharePoint to Medupi Documentation Department Help Desk by the Process Owner once completed.

Process Owner shall proceed with any revision requirements in line with Medupi Procedures, **348-653867** "Development and Change of Medupi QMS Documents" and **348-883808** "Document and Record Management".

4.2.2 Review Period

All EMS documents shall undergo a compulsory three yearly revision.

4.3 Training Requirements

Training in ISO 14001:2015 Standard and Risk Assessment are required to enable successful implementation of this process.

5. Acceptance

This document has been seen and accepted by:

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Name	Designation
N Khuzwayo	Safety, Health & Environmental Manager
Z Shange	General Manager-Medupi GC
B Mgidlana	Project Quality Manager
L Xaba	Senior Advisor Quality Assurance
C Komape	Officer Documentation

6. Revisions

Date	Rev.	Compiler	Remarks
2024/09/09	08	S Mamabolo	Three yearly review, changed aspect& impact register and criteria for ratings.
2021/09/23	07	M Boshomane	Three yearly review, including minor changes e.g. change in management
2018/05/19	06	M Boshomane	Audit finding corrective action

7. Development Team

The following people were involved in the development of this document:


- Sakutanya Mamabolo
- Dovhani Mudzielwana
- Ntahli Khuzwayo

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Appendix A – Process Self-Assessment Checklist

	MEDUPI POWER STATION PROJECT	Template Identifier	348-655890	Rev	2
		Document Identifier	348-10068587	Rev	1
		Effective Date	January 2022		
		Next Review Date	January 2025		
TITLE: Document Self-Assessment Checklist					

Discipline:		Applicable Document No.: 348-860847			Self-Assessment Date: 26 / 09 / 2024	
Item No	Ref Section	Self-Assessment Question	Compliant			Comment
			Yes	Part	No	
1	2.5.1, 3.1, 3.2 & 3.3	Has an Environmental Aspect and Impact Register been compiled?	x			
2	3.1	Have the following facets been considered in determining the environmental aspects and associated impacts:				
3	3.1	<ul style="list-style-type: none"> potential and actual impacts 	x			
4	3.1	<ul style="list-style-type: none"> positive and negative impacts 	x			
5	3.1	<ul style="list-style-type: none"> direct and indirect impacts (the use of a resource such as electricity indirectly uses water and fuels which are examples of indirect impacts) 	x			

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6	3.1	<ul style="list-style-type: none"> inputs and outputs associated with current, past and planned activities, products and services 	x			
7	3.1	<ul style="list-style-type: none"> normal, abnormal and reasonable foreseeable emergency situations 	x			
8	3.1	<ul style="list-style-type: none"> potential secondary and cumulative impacts 	x			
9	3.1	<ul style="list-style-type: none"> The extent to which Medupi Power Station Project has control or influence over its activities, products and services. 	x			
10	3.2	Have the environmental impacts been rated?	x			
11	3.1, 3.2 & 3.3	Have the most significant impacts been identified?	x			
12	3.1, 3.2 & 3.3	Have positive impacts been identified?	x			
Comments: The criteria used to rate the aspects should be changed to align to other Eskom Protocols and user friendly.						
Self-Assessment by:		Name: Dovhani Mudzielwana	Position: Senior Environmental Advisor		Revision Required? (Yes / No) Yes	Planned Revision Date: September 2024
Attendees: Sakutanya Mamabolo						

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Appendix B – Significant Environmental Aspect and Impact Register Template

	MEDUPI POWER STATION PROJECT													Template Identifier	348-10092514	Rev	1
														Unique Identifier		Rev	
														Effective Date			
														Next Review Date			
TITLE		ENVIRONMENTAL ASPECTS AND IMPACTS REGISTER (CONSTRUCTION PHASE)															
Ref. No	Area / Department / Unit	Activities / Products / Services	Aspect	Impact	Risk	Opportunities	Normal	Abnormal	Emergency	Pre-mitigation rating			Controls (Engineering, Management, Admin, Monitoring, Documentation & Inspections)	Project EMP Reference	Legal Requirements/s Reference	Other requirements Reference	Action / Monitoring Measurement Requirement (if applicable)
										Environmental rating		Significance Rating					
										Consequence	Likelihood						
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File Name : 348-10092514 Environmental Aspect Impact Register (Construction Phase) Template Rev 1-Final																	

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Appendix C – Environmental Aspect and Impact Register Template (Units/Departmental/Area)

Medupi Power Station Project (Construction Phase) Environmental Aspects and Impacts Register															Date: September 2024	SPO No. 348-10092514	Rev 1	
Ref. No	Area / Department / Unit	Activities / Products / Services	Aspect	Impact	Normal	Abnormal	Emergency	Pre-mitigation rating			Controls (Engineering, Management, Admin, Monitoring, Documentation & Inspections)	Post-mitigation rating			Project EMP Reference	Legal Requirements/s Reference	Other requirements Reference	Action / Monitoring Measurement Requirement (if applicable)
								Environmental rating		Significance Rating		Environmental rating		Significance Rating				
								Consequences	Likelihood			Consequences	Likelihood					

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