

 Eskom	Procedure	Matla Power Station
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Number:

Area of Applicability: **Matla Power Station**

Functional Area: **Environment**

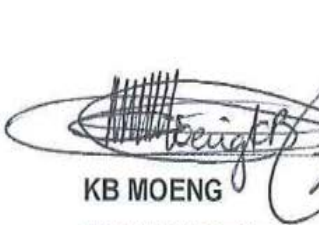
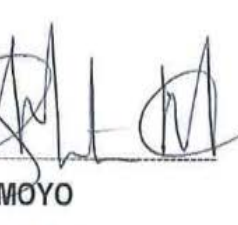
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1. Introduction

The contractors and suppliers are integral part of the Matla Power Station activities, product and services. Contractor management is crucial to the success of environmental management system. Matla's Environmental Policy provide a commitment to all employees within Matla Power station who are directly involved in the appointments, awarding, use and management of contractors and suppliers.

2. Supporting Clauses

2.1 Scope

2.1.1 Purpose

To outline the environmental requirements for the permanent and temporary contractors at Matla Power station. This procedure ensures that Contractors take full responsibility of protecting the natural environment by eliminating or minimising the negative impacts of their operation on the environment. Nothing specified herein this procedure shall relieve the contractor or departments of any obligations or responsibilities in this regard.

This is developed based on ISO 14001, serving as a guiding and systematic tool, to undertake the environment and natural resources protection. This procedure will be the guiding principles for the establishment, implementation, maintenance and continuous improvement taking into consideration life cycle perspective of its activities, services and products in managing the environment aspects and compliance responsibilities. This process will also outline the risk management of threats and opportunities and meeting the needs and expectations of interested parties. This procedure serves as the foundation for the Matla Power station efforts in the continuous improvement of EMS and its processes.

2.1.2 Applicability

The requirements of this procedure apply to all areas under Matla Power Station's control, All contractors working for or on behalf of Matla Power Station shall comply with this procedure. In the event of any difference or discrepancy between the provisions of other procedures from contractors related to environmental management system, this procedure shall prevail. This document is applicable to all Eskom contractors and visitors whose activities, services or products may have an impact to the environment.

2.1.3 Effective date

Same as authorisation date

2.2 Normative/Informative References

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

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2.2.1 Normative

- [1] Environmental Management System: ISO14001:2015
- [2] Environmental Management System Manual 13340
- [3] Identification And Prioritisation of Environmental Aspects and associated Risks and Opportunities OMOP 4019.
- [4] Matla Power Station Environmental Policy
- [5] Matla Power Station Waste Management Procedure OMOP 4090.
- [6] Compliance obligations, evaluation of compliance and planning action OMOP 4108
- [7] Emergency preparedness and response OMOP 4010
- [8] Auditing Procedure, OMOP 2570

2.2.2 Informative

- [9] Non Conformity, corrective action OMOP 2255.
- [10] Applicable legislation and other requirements.

2.3 Definitions

Environmental Aspects: Elements of organisation's activities, products and services that can interact with the environment. Example: oil spillage, consumption or disposal of material, emission discharge.

2.3.1 Environmental Impacts: Any changes to the environment, either adverse or beneficial, that results wholly or partially from environmental aspects. Example of adverse impact: surface water pollution, air pollution, land pollution. Example of beneficial impact: improved water or soil quality.

2.3.2 Permanent Contractors: refers to the contractors who are established and working onsite

2.3.3 Temporary Contractors: refers to the contractors who are not established onsite but working onsite

2.3.4 Group A Contractor: All contractors working for and on behalf of Matla Power Station on a once off or outage programs and their activities might not cause potential harm to the environment. Assessment for these contractors shall be done by completing the Environmental Contractors Assessment Form (Annexure A) Sign Contractors commitment and indemnity letter (refer to Annexure D). If there is any yes to the questionnaire then the Environmental Officer must be notified to conduct a proper assessment on the contract. The scope and Environmental Aspect and Impact register will be required to be submitted to Environmental department and regular monitoring will be required. **NB This grouping is for procurement tender returnable environmental requirements evaluation purposes.**

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2.3.5 Category B: All contractors performing work for or on behalf of Matla Power Station and that their activities might cause harm to the environment. These contractors are required to submit minimum requirements of ISO14001:2015, which are: Environmental Policy; Aspects and Impacts register; Operational Control; Compliance obligations and completion of Environmental Contractors Assessment form and Sign Contractors commitment and indemnity letter OR ISO14001 certified with valid certificate and subsequently have Environmental file based on ISO14001:2015. NB This grouping is for procurement tender returnable environmental requirements evaluation purposes.

2.4 Abbreviations

Abbreviation	Explanation
SHEQ:	Safety Health Environment and Quality
EMS	Environmental management systems
ER	Environmental Representative
Contract Manager:	Eskom employee who work as representative

2.5 Roles and Responsibilities

All contractors and visitors are responsible and accountable to implement the environmental plan; they also have a responsibility to work in a manner which does not pose any risk to the environment.

Role and Position

Position	Role and responsibility
Contract Manager	• Ensure the appointed contractor or suppliers are aware and comply with the requirements of this procedure and submit all required documents before commencing with the work. Ensure the copy of this procedure is given to the contractors.
Suppliers including visitors	• Shall notify the Environmental Management Section of environmental issues, incident, and complaints. • Conduct all operations according to this EMP as well as applicable legal and other requirements. • Communicate environmental issues as they arise.

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Project managers	• Ensure the projects are undertaken in a manner which protects the environment and in accordance with statutory requirements and Eskom SHEQ Policy and Matla Power station Environmental policy. • Ensure implementation of this EMP and specific environmental management plans developed for the specific projects. • Communicate environmental issues to suppliers as they arise
Contractor SHEQ Officers & Reps	• Ensure that all site personnel, including sub-contractors, are aware of their environmental responsibilities in the management and implementation of this EMP • Ensure that corrective and preventative actions arising from internal assessments or environmental audits are implemented.
Contractors (Managers and Supervisors):	▪ Ensure overall compliance of this procedure. ▪ Designate a Environmental representative within the organisation on supervisory level with a responsibility of environmental representative on a full time basis on site, The Environmental representative shall go through necessary environmental awareness training course to ensure adequate environmental monitoring and control. ▪ The ER shall be a person with adequate environmental knowledge to understand and implement this procedure. ▪ The Contractors and contract manager shall ensure that ER, and Sub-Contractor's ER, attend Environmental Awareness Training course/s. The Environmental Awareness Training course/s shall be structured to ensure that attendees: - Acquire a basic understanding of the key environmental aspects within the working area; - Become familiar with the environmental controls identified in the Environmental aspects register contained within this procedures and - Receive instructions regarding compliance with the relevant environmental management requirements (i.e environmental "do's" and "don'ts"); and - Are made aware of any other environmental matters as deemed necessary by the Environmental Department. - Ensure that environmental awareness training for Environmental Representative is held within 90 days from the Commencement date and subsequent awareness shall be arranged for new employees coming onto site. - Shall ensure that he/she attend the Monthly site meetings e.g Main SHEQ, Contractors meetings.
Environmental Officer	• Advising the contractors in terms of any environmental management issues related to the contractors activities.

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	• Verify and sign off the completed housekeeping check sheet and required documents as per this procedure. • Reviewing contractor's documentation and enforcing compliance to all Matla EMS/ISO14001:2015 related procedures and applicable environmental compliance obligations related to contractors activities • Conduct MAIN SHEQ monthly meeting with all contractors. • Reviewing contractors yards housekeeping check sheet and facilitate and coordinate the corrective measures for any environmental non-conformance.
Visitors/contractors	• Undertake works in an environmentally responsible manner, and in accordance with the requirements stipulated in this EMP.
Designated Environmental Representative's (ER)	• To ensure implementation of Environmental Management System, irrespective of other responsibilities within the organisation. Ensure that all required templates and documents are submitted. • Liaison with the Environmental Department with regard to environmental issues; • Monitoring of compliance of the Contractor's activities with the various environmental requirements contained in this procedure; • Reporting and instituting of remedial action in the event of non-compliance; • Record, report and keep a register of employees' environmental complaints and comments or issues to environmental department; • Recording, filing and reporting of environmental incidents to Environmental Department on monthly basis; • Ensure that Environmental Management System file is present during internal auditing and external auditing as per notice. • Ensure that toolbox talk topics issued by the SHEQ officer are shared. • Shall ensure that he/she attend all contractors' environmental site meetings e.g. Main SHEQ, Contractors meetings, Outage plant walks etc.

2.6 Process for Monitoring

Implementation of this procedure will be monitored during annual Environmental file reviews and or during audits. Housekeeping checks sheets completed by contractors in their working area.

2.7 Related/Supporting Documents

Not applicable

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3. Document Content

3.1 Context of the organization

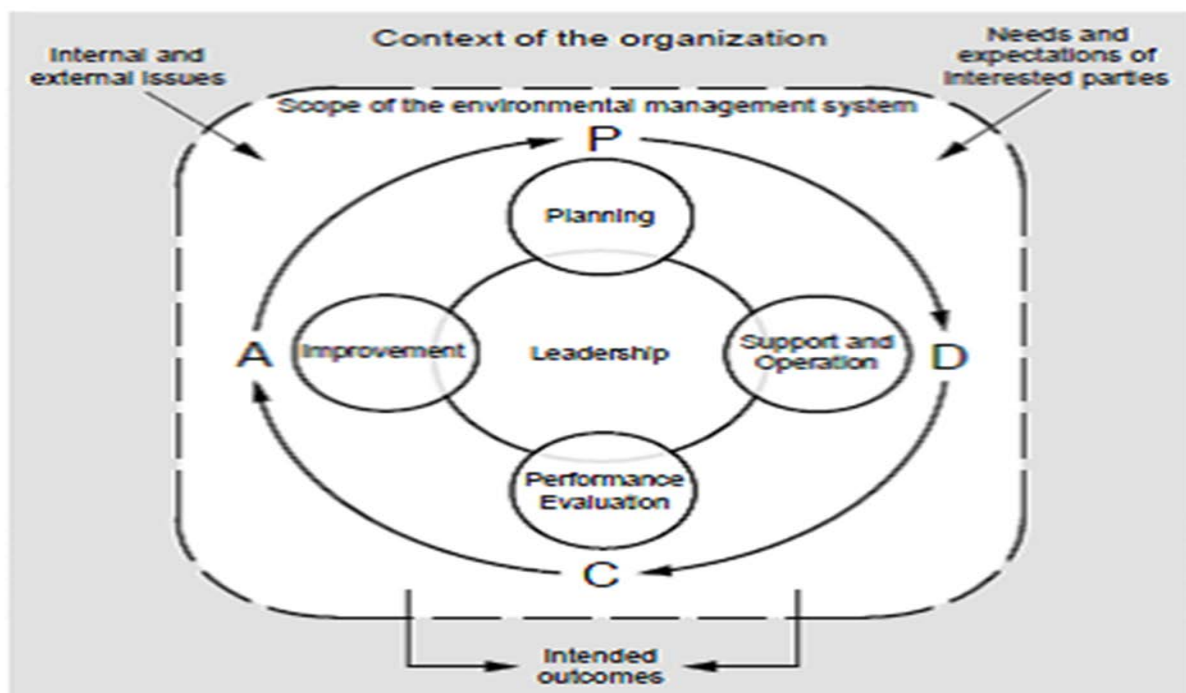
(Based on ISO 14001, clause/element 4)

The environmental management system is aimed at achieving and demonstrating sound environmental management by determine external and internal issues that are relevant to our purpose and context that affect Matla's ability to achieve its intended outcomes. Such issues shall include environmental conditions being affected by or capable of affecting the organization, by identifying and controlling the aspects and associated impacts of Matla Power Station's activities, products and services.

3.2 Understanding the organisation and its context

(Based on ISO 14001, clause 4.1)

Matla has determined its external and internal issues that are relevant to its purpose and that affect its ability to achieve its intended outcomes of the EMS. These issues include environmental conditions (EC) being affected by Matla and its contractors or suppliers or cable of being affected by Matla and its contractors or suppliers.



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3.3 Understanding the organisation and its context

(Based on ISO 14001, clause 4.1)

Matla has determined its external and internal issues that are relevant to its purpose and that affect its ability to achieve its intended outcomes of the EMS. These issues include environmental conditions (EC) being affected by Matla or cable of being affected by Matla.

Environmental conditions	Issues relevant to Matla's EMS	IN/EX	Pos/Neg	How issues affect Matla's EMS	EC being affected by the Matla	EC capable of affecting Matla
Climate	<i>Climate change</i> -Drought lack of rainfall for prolonged periods within our area.	EX	Neg	Water reduction limited amount of water for electricity generation. Leading to high consumption of water to generate electricity	Resource depletion, water downstream use with less water Increase in water abstraction to compensate high evaporation	Resource re-allocation for electricity vs domestic use
	<i>Climate change (green house gaseous)</i> – and High ambient temperature	EX	Neg	High evaporation rate increase salts within the dam (impact on concentrated pollutants) Increase in water abstraction to compensate high evaporation Cooling tower efficiency unable to maintain our	Emissions	Decrease water abstraction limit – decrease power generation Resource re-allocation for electricity vs domestic use

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				water targets (more evaporation)		
	<i>Climate change – floods and storms</i>	EX	Neg	Dam overflow caused by floods, storms affecting biodiversity and structural stability	Emissions and dam control within the freeboard.	Free board increase. Post Rehabilitation uncontrolled water releases to interested parties. Financial aid for disaster management
Air quality	Matla is situated within the Highveld Priority rea	EX	Neg	AEL legal obligation to comply with stricter limits	Climate change. Ambient air quality that affects the local community from the emissions.	Matla to comply to Ambient air quality requirements- Matla has embarked on the offsets to comply to the AEL.
Water quality	Surface and underground water pollution within the Upper Olifants River Catchment	EX	Neg	WUL legal obligation to comply with stricter limits	Non point seepage contributing to the pollution of the catchment	Legal requirements to control our pollution control dams. Treatment of polluted water – cost implication

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Land use	Land leased to the farmers	In	Pos	Land maintained by farmers while leased to them, used for agricultural purposes.	Financial gain from leasing.	Socio-economic empowerment by allowing different farmers to lease land.
	Land used for game	IN	Pos and Neg	Keeping of game within the station and having animals within the ash dam and the management thereof.	Overgrazing, soil erosion.	Legal obligation to have necessary permits for possession, transportation and culling. Reduce leasing agreement on farmers to ensure enough carrying capacity to accommodate game (possibility of creating a nature reserve)
Existing contamination	Ash dam build on mine spoils (pit 3)	IN	Neg	Compliance to underground water qualities	Seepage and further contamination from mine spoils and ash	Compliance to MPDRA (Mining act) and DWA & DEA closure requirements
Natural resources availability and biodiversity	Alien species	IN	Neg	Regulations pertaining to alien species	Water depletion, biodiversity imbalance	Legal obligation to control and eradicate alien invasive species
	Fuel, Coal & water	EX	Neg	Continuous usage of these natural resource to produce electricity.	Natural resource depletion. Underground and surface voids	High costs for demand ,Alternative power generation (e.g. IPPs r (Wind, Solar, Hydro)

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Cultural	Grave site - Heritage sites	EX	Neg	Operation Planning related to pipes, re-routing and increase in length. Interested parties possible conducting rituals around the site.	Operating within the proximity of the heritage site causes intrusion of sites	Contaminated operational areas limited access to rehabilitate within areas. Possible ground water pollution
Social	local communities impacted on health by our operations	IN	Neg	Optimise and operate efficiently	Poor air quality	Financial implications towards offset and emission reduction technology
Political	Transformation - Empowerment – local vs national employment	EX	Neg and pos	Employment of local employees for that might work with EMS – ash dams, emission monitoring without skills.	Non-compliance, poor management of EMS and environmental degradation	Training on skills transfer and development for local employees.
Legal/regulatory	Change of legal requirements.	IN	Neg	Stricter water and emissions limits	Non	Licence to operate
Financial economical	Limited financial resources	IN	Neg	Unable to implement projects that will treat water for reuse (e.g OR plant)	Failure to implement crucial projects to minimised waste	Failure to meet environmental objectives

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				Ash sales and brick making – reduction and recycling of waste(ash)		
Technological	Old station operating with old technology	IN	Neg	Financial implication to continue to operate within legal requirements with high emissions and water wastage	High emissions and water wastage	Legal compliance and financial implications. Poor plant maintenance
Competitive circumstances	Competition with IPP (independent power producers) usage of cleaner technology and renewables	EX	Neg/Pos	Positively we will reduce to produce using coal less pollution	Positive - reduced water intake and other natural resources	Strategic policies
Activities	Poor plant maintenance	IN	Neg	Repeat incidences, inability to be sustainability.	Surface water, land contamination, Increase waste water in dams, health impact of employees	Aging plant causing undesired pollution and environmental degradation

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	Shut downs for outage and maintenance	IN	Neg	Unable to achieve our environmental objectives during start up. Due to water intake and not achieving our water target.	High water intake	
Products	Surplus Electricity-Cold reserve	IN	Neg	Units on cold reserve contribute towards high intake of natural resources and high emissions during start up	Natural resource depletion	Financial loss
	Input products/material Poor Coal and fuel					
	Ash as a waste product in the ash dams	IN	Neg	Waste management water pollution and land degradation	Generation of ash as by-product	Legal obligation to comply.
Life cycle	Life cycle of power	IN	Neg	Waste management	Poor management of products and maintenance	Financial costs of disposal, natural resources depletion.

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	generation					
Services	Coal supply by Exxaro mine from the coal stockyard to the station via conveyor belts	IN	Neg	Poor coal resulting in high emission	Emission - poor air quality	Coal-natural resource depletion, underground voids
	Outsource service providers			Sustainability of the EMS		
Strategic direction	Operating beyond the life of plan of the station (from 2030 -2060	IN	Neg	Operating the old plants with equipments to meet the new requirements to meet objectives.	Water depletion and pollution, emissions	Unable to meet station environmental objectives
Culture	Reporting of environmental incidences.	IN	Pos	Positive- able to put preventative measures and actions to prevent legal contraventions.	Prevention of further environmental degradation	Protection of natural resources
Capabilities (people knowledge, system)	Turnover of skilled and knowledgeable employees (age gap)	IN	Neg	Unable to sustain operation and unable to meet our intended outcomes. Unable to recruit and		

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3.4 Leadership

- **Leadership and Commitment**

(Based on ISO 14001 clause 5.1)

The Top management shall demonstrate leadership and commitment with respect to the EMS by:

- a) taking accountability for the effectiveness of EMS – meetings within Matla powers station, appointment letters as managers accountable for your section.
- b) ensuring that the environmental policy and environmental objectives are established and are compatible with the strategic direction and context of the station
- c) ensuring the integration of the EMS requirements into the station's business processes – meetings within Matla power station;
- d) ensuring that the resources needed for the EMS are available – appointment letters for environmental reps; Tech plan(LOPP) and Investment Committee
- e) communicating the importance of effective EMS and are conforming to EMS requirements – all meeting such as SHEQ meetings, plant meetings, Matla All communication
- f) ensuring that the EMS achieves its intended outcomes – station contract, EMP from objectives
- g) directing and supporting persons to contribute to the effectiveness of the environmental management systems – actions and response on the management review
- h) promoting continual improvement – objectives and targets business plan
- i) supporting other relevant management roles to demonstrate their leadership as it applies to their areas of responsibility – projects technical plans, investment committee, business model and plan,

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- **Environmental Policy**

(Based on ISO 14001 clause 5.2)

Matla Power Station's (MPS) top management will continually implement and maintain an Environmental Management System (EMS) to effectively manage the environmental aspects of the station's activities, products and services, within the defined scope.

MPS's top management is also committed to the protection of the environment through prevention of pollution and minimizing environmental degradation. MPS will continually improve the EMS in order to enhance its environmental performance and to fulfil all applicable compliance obligations.

This environmental policy is aligned with the ESKOM's SHEQ policy (32-727).

Consistent with our commitment, MPS's top management will:

1. Establish, implement and maintain an Environmental Management System that is consistent with the framework as described in ISO14001:2015 Standard;
2. Fulfill all its compliance obligations which is applicable and those that Matla subscribes to;
3. Strengthen partnerships and collaborative mechanisms, with our interested parties to consider and address their needs and expectations;
4. Set performance indicators, which will be reviewed regularly to measure our environmental performance to ensure continual improvement;
5. Identify environmental risks and opportunities, setting and reviewing environmental objectives and targets for our significant aspects and develop appropriate environmental management programmes to achieve our intended outcome;
6. Provide necessary training and awareness for our employees and contractors;
7. Communicate the Environmental Policy to persons working for and on behalf of Matla Power Station;
8. Strive to introducing green procurement by adhering to a life cycle thinking by ensuring Matla's contractors meet our environmental requirements;
9. Provide adequate resources necessary to achieve and sustain effective environmental management;

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- 10.** Sustainably and efficiently utilizing our natural resources such as water and coal by effectively managing our activities in running our operations with the aim to minimize our environmental footprint;
- 11.** Always striving to achieve Zero Harm to the environment by protecting the environment and preventing pollution wherever practical, pursuing a low-carbon future and prioritizing climate change and air quality mitigation and adaptation.

The Policy is reviewed annually as part of the EMS Management Review. This policy will provide the framework for setting environmental objectives and our intended outcomes. This policy will be available to interested parties on request. All service providers are required to have a copy of this policy in their files and office areas.

Relevant procedure / documents:

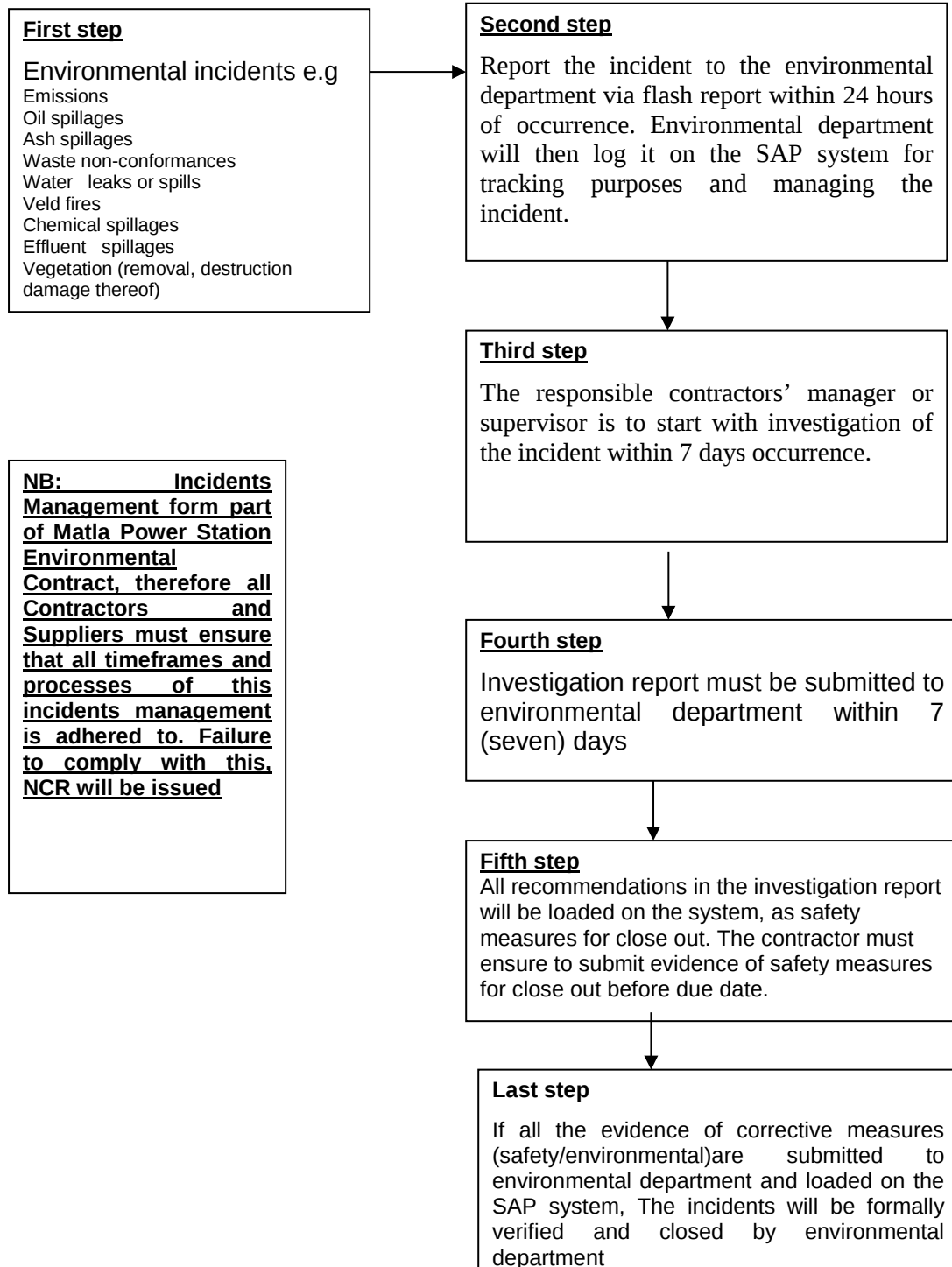
Matla Environmental Policy (13340-04).

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3.5 Incidents Reporting

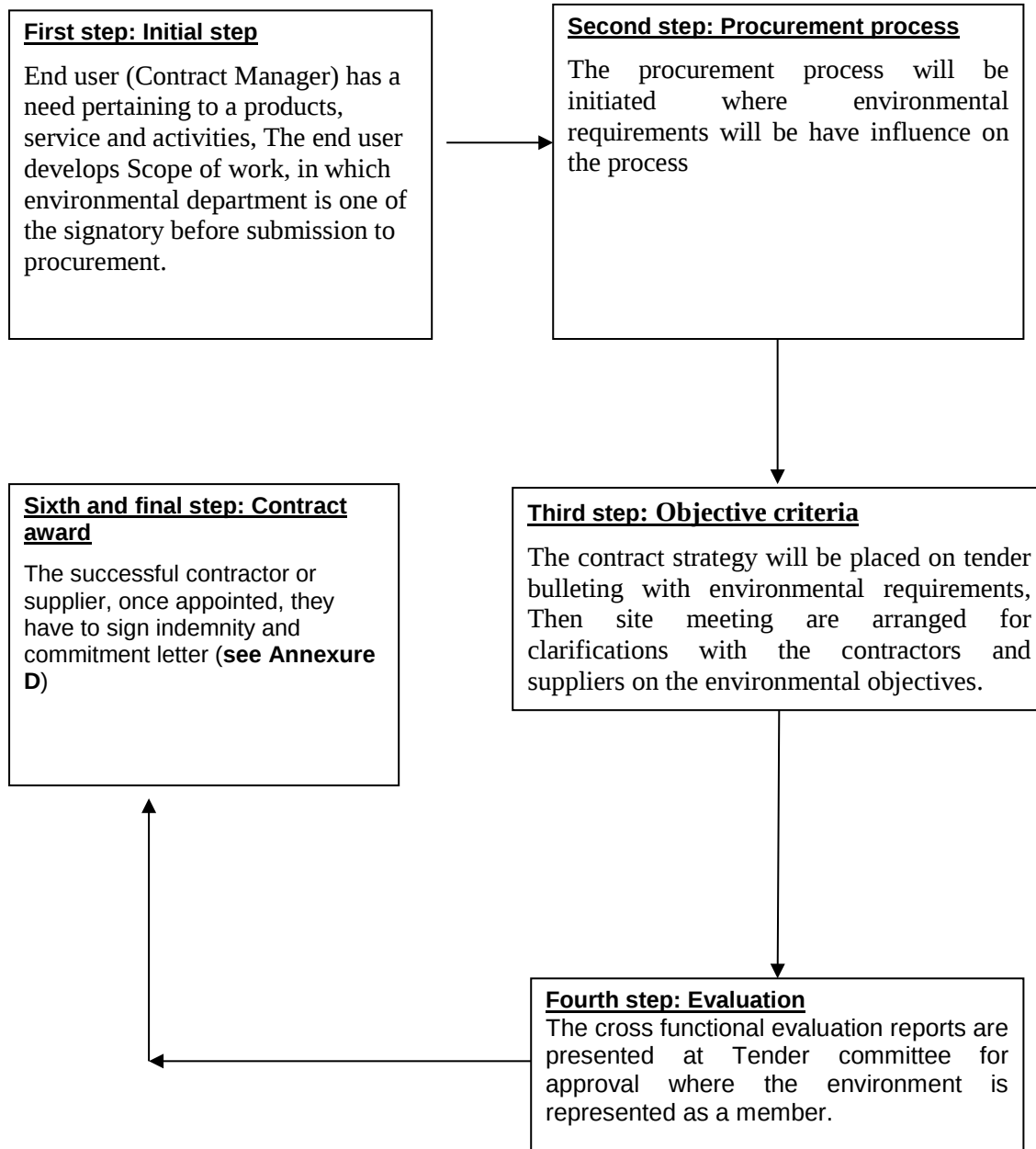


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3.6 Environmental Procurement or commercial Process and life cycle operational control for contractors at Matla Power Station



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Once the scope of work is done, the copy is then send to all respective departments for signatures including Environmental department, then to the buyer at procurement, The buyer will then send the NEC3 Term Service Contract strategy document which has environmental requirement provision as per Preferential procurement policy framework act (PPFA) Implementing SHEQ as objective criteria to ensure that SHEQ Tender Returnables are identified by SHEQ department, which highlight minimum requirement and scoring criteria, before placed on the Tender bulletin.

SHEQ is now an objective Criteria. The objective criteria has the ability to change the ranking of the tenderer if the negotiations fail or the opportunity given to the tenderers to submit a document within a certain time period is no met.

As a result of SHEQ being part of objective criteria, the procurement practitioner and Contract Manager must ensure that the SHEQ officers/ representative are part of the evaluation of the objective criteria. After evaluation is done, the final consolidated tender report is then sent to Tender Committee for approval, where SHEQ department is also represented.

Environmental requirement as objective criteria are categorised into two Contractors management categories:

Category A:

All contractors working for and on behalf of Matla Power Station on a once off (supply and delivery) or outage programs and with their activities which might not cause potential harm to the environment. Assessment for these contractors shall be done by completing the **Environmental Contractors Assessment Form and Sign Contractors commitment and indemnity letter**. If there is any yes to the questionnaire then the Environmental Officer must be notified to conduct a proper assessment on the contract. These suppliers or contractors must adhere or adopt the Contract Manager' Environmental Aspect and Impact register and the management thereof.

Category B:

All contractors performing work for or on behalf of Matla Power Station and that their activities might cause harm to the environment. These contractors are required to submit minimum requirements of ISO14001:2015, which are: **Environmental Policy; Aspects and Impacts register; Operational Control; Compliance obligations and completion of Environmental Contractors Assessment form, Sign Contractors commitment and indemnity letter OR ISO14001 certified with valid certificate** and subsequently have Environmental file based on ISO14001:2015 .

All Suppliers need to get Matla Waste Management Procedure from the Environment Department prior to the contract commencement. For environmental for criteria for evaluation see **Annexure B**.

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3.7 Contractors' Legal Obligation and General Requirements

- The contractor shall ensure that authorisation is received and approved from a competent or relevant authority before commencement of work, if the activity is listed in the National Environmental Act 107 of 1998, EIA Regulations
- The contractor shall comply with all applicable legal and other requirements;
- All contractors shall observe and obey any relevant environmental legislation and in so doing shall be undertaken in a manner that will minimise impacts on the surrounding environment, the public and adjoining landowners;
- Contractors shall ensure that they manage their environmental impacts and comply with all operating requirements and conditions required by legislation relevant to environmental management including but not limited to licenses, sections of the acts and regulations, development approval, guidelines operating procedures, legislatively defined management plans reports and agreement; and other requirements within the station.
- The contract manager shall ensure that the supplier complies with Eskom Matla Power Station Environmental procedures in order to minimise and prevention of pollution.
- Contractor shall report all waste removed by the contractor/supplier on site by submitting a safe disposal certificate to the environmental department;
- All contractors must have or adopt their Contract Manager's department Environmental aspects and impacts register;
- The Contractor shall implement all the necessary environmental protection measures in each area before any work will be allowed to proceed;
- The polluter pays principle: The contract manager will ensure that the last payment will be processed in conjunction with the last housekeeping check. The supplier and contract manager will conduct an assessment of the state of the environment at a provided/designated site and submit the check sheet to environmental department before commencement of work. At the end of the contract period, assessment will be conducted again. Any housekeeping or waste related findings will be on the account of the supplier.
- The supplier shall have Environmental Management System File, based on ISO 14001:2015
- All contractors must be made aware of and comply with the ESKOM SHEQ Policy and Matla Environmental policy requirements. This can be achieved during induction and will form part of the training matrix;

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- All contractors under Group A category of Contractors shall not be required to have the Environmental file with ISO14001 Elements, unless there are changes in the scope of work, but will be required to have or to adopt the Contract manager's department Environmental aspects and impacts register. In such cases where the scope has changed, re-assessment must be conducted by the contractor by completing the assessment form again;
- All contractors in the Group B category of contractors shall be required to have Environmental file as per ISO14001:2015 Elements, within 6 months of the commencement of the work.

3.8 Environmental Operational procedures

The Environmental department may require changes to an Operational procedure if the proposal does not comply with the relevant legislation or if, in the reasonable opinion of the Environmental Officer, the procedure may result in, or carries a greater than reasonable risk or, damage to the environment.

Approved Operational procedure shall be readily available on the site and shall be communicated to all relevant personnel. Where necessary the requisite training shall be given to the personnel to facilitate compliance with the approved Operational procedure.

The Contractor shall carry out the works strictly in accordance with the approved Operational procedure. Approval of the Operational procedures shall not absolve the Contractor from any of his obligations or responsibilities in terms of the Contract.

All the Contractors who are working for or on behalf of Matla Power Station are required to adopt Matla Waste Management Procedure and they may choose to adopt any other Matla Power station procedures. The contractors that their activities involve the transporting, off/on loading and storage of bulk hazardous or chemical substances are required to have Emergency procedures for spillages of hazardous substances and means of storage.

The applicable emergency procedure shall include:

- o Accidental leaks and spillages control,
 - o Materials Handling, Use and Storage,
 - o Hazardous and Asbestos Waste,
 - o Fuel (petrol and diesel),
 - o Paints, solvents and other chemicals,
 - o Herbicides and pesticides, etc
- And other applicable procedures.

3.9 Cost of non-Compliance (Polluter Pays Principles)

Where environmental damage occurs as a result of the failure of the contractor and the project manager to comply with the requirements, of this procedure, the appropriate remediation shall be effected to the satisfaction of the Environmental Officer and at the cost of the Contractor, with the contract manager or the department involved.

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3.10 Contractors' Assessment Form Template

This Assessment form is to determine the extend at which the contractor will have impacts on the environment and also determine whether the contractor will be required to submit environmental file or not.

- i. Environmental Contractors Assessment Form (see Annexure A)

3.11 Environmental Management Operational Planning and control for Contractors at Matla Power station

This Environmental Management Plan is compiled in terms of Section 28 of National Environmental Management Act, 107 of 1998 which stipulates duty of care for environment. Matla Power Station has a duty to exercise this directive in both operational and decommissioning phase. This Environmental Management Plan is a site-specific plan developed to ensure that all necessary measures are identified and implemented in order to protect the environment and comply with environmental legislation

The EMP plays a key role in implementation of consistent and continued environmental management for the duration of the operational life cycle of the Power Station. The EMS aims to:

- Draw attention to all the key environmental management requirements
- Provide an environmental management planning document for incorporation to operational
Environmental Management Systems, remediation procedures.
- Define and outline the functions, roles and responsibilities of persons accountable for
effective environmental management
- Outline mitigation measures and environmental specifications required
- Identify the requirements for safe operating procedures
- Prevent long-term environmental degradation
- Define requirements and procedures for monitoring
- Outline procedures for environmental management and control, in the event of pollution or similar incidents

The purpose is to identify all risks and impacts related to environmental degradation and human health, thereafter formulate actions to enhance positive environmental impacts and mitigate/prevent negative impacts, in order to prevent contravention of environmental laws governing KPI's operations.

The purpose of environmental implementation and management plans is to co-ordinate and harmonise the environmental policies, plans, programmed and decisions of the various Eskom departments, contractors and visitors that exercise functions or activities that may affect the environment. To entrust with powers and duties aimed at the achievement promotion and protection of a sustainable environment in order to minimise the duplication of procedures and functions; and promote consistency in the exercise of functions that may affect the environment.

3.11.1 Matla Power Station Environmental Management Framework

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To ensure effective implementation of Environmental Management System which is in compliance with ISO 14001 Standard, Matla Power Station established this EMP to give detailed guidance and direction to all stakeholders and suppliers who needs to play a role for Matla EMS to be fully implemented and effective. This EMP has been structured on the major components of the ISO 14001 Environmental Management Systems Standard.

Summary of Impacts Associated with suppliers' activities at Matla Power Station's Operations

Environmental Aspects are identified as per the OMOP 4019 procedure for all Matla Power Stations activities, products and services including planned or new developments and modified activities. The Aspects include environmental aspects with cognisance of organisational control or influence, and those arising from normal or abnormal or reasonable foreseeable.

Summary of Matla Power Station Environmental Aspects are as follows:

- Air Emissions (e.g PM, fugitive dust, gaseous: NO_x SO_x, Climate Change pollutants: CO₂)
- Materials Storage, handling and use
- Water usage and discharges
- Waste Management (e.g waste separation and minimisation hierarchy).
- Banned hazardous chemical substances (e.g Asbestos, PCBs)
- Local issues and complaints from interested parties (e.g., noise, odour, dust, traffic etc.)
- Energy use
- Land and Biodiversity (e.g springboks)
- Natural Resources use (water, energy, fuel, top soil etc.)
- Facilities operation and maintenance
- Purchases or (subcontracted) products and services

3.11.2 Determination of Environmental aspects

- All service providers operating under Matla Power Station Premises must identify environmental Aspects and Impacts associated with their activities, product and services within their EMS scope of work on site as defined in ISO14001, clause 6.1.2.
- Aspects and Impacts must be properly documented in an aspect and impact register,
- Aspects and impacts register must take into account any new developments or planned developments, new or modified activities, products and services.
- Identified aspects and impacts must also be linked with legal and other requirements which they relate to. E.g. Aspect regarding potential oil spillage can be linked with Oil spill response procedure and also the relevant section from the National Water Act.
- Aspects and Impacts registers must clearly indicate the aspect significance rating and risk and opportunities associated with it as per ISO14001, clause 6.1.1.
- Awareness training on the identified aspects and impacts for the specific working area must be conducted with all employees in the particular area.
- To assist in identifying and developing aspects and impacts registers, procedure OMOP 4019 can be consulted.

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- Service providers who have their own procedure to guide identification of environmental aspects must ensure that their procedure meets the requirements of clause 6.1.2 of ISO14001 standard.

N.B All contractors who do not have their own aspects and impacts register must adopt the aspect and impact register of the direct reporting or contracted department within Matla.

3.11.3 Legal Requirements (Compliance obligations)

All activities, products and services taking place within Matla Power Station must adhere to and comply with all applicable South African legislation and regulations and these requirements must be linked with the aspects and impacts for the specific working area. Should there be changes in legislation and/or regulations, then actions will be taken to incorporate such changes. Specific legislation that must be complied with includes, but is not necessarily limited to:

- Constitution of South Africa (Act 108 of 1996), section 24.
 - National Environmental Management Act , 1998 (Act No. 107 of 1998)
 - National Environmental Management: Air Quality Act, 2004 (Act 39 of 2004)
 - National Environmental Management: Waste Act 59 of 2008
 - National Water Act, 1998 (Act 36 of 1998)
 - Animal Protection Act, 1962 (Act 71 of 1962)
 - Conservation of Agricultural Resources Act, 1983 (Act 43 of 1983)
 - Environmental Conservation Act, 1989 (Act 73 of 1989)
 - Hazardous Substances Act (Act 15 of 1973)
 - Mine Health and Safety Act, 1996 (Act 29 of 1996)
 - Mineral and Petroleum Resources Development Act , 2002 (Act 28 of 2002)
 - Municipal Structures Act, 1998 (Act 117 of 1998)
 - Municipal Systems Act, 2000 (Act 32 of 2000)
 - National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004)
 - National Forests Act (Act No 84 of 1998)
 - National Heritage Resources Act, 1999 (Act 25 of 1999)
 - National Parks Act, 1976 (Act 57 of 1976)
 - National Veld and Forest Fire Act, 1998 (Act 101 of 1998)
 - Occupational Health and Safety Act, 1993 (Act 85 of 1993)
-
- All suppliers or contractors must be able to access legal and other requirements identified in the aspects and impacts registers
 - Contractors managers, SHE officers and supervisors have the responsibility of accessing legal and other requirements to share with their fellow employees
 - Proof of awareness conducted for any legal (e.g. permits, license, acts,) and other (procedures, SANS, etc.) requirements must be made available for future referencing.
 - Service providers or contractors who do not have any private site to access legal requirements may get access www.discover.sabinet.co.za.

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- All service providers can also access legal and other requirements through Matla Power Station's Environmental Department and may request the documents such as permits and licenses should there be a need.
- Matla Power Station's Identification and Evaluation of Compliance to Legal and other Requirements procedure (OMOP 4108) must be consulted for more detail.

3.11.4 Environmental objectives

- All service providers are required to rate the significance of environmental aspects
- Service providers who have their own procedure to guide the rating of environmental aspects must ensure that it gives clear criteria of aspects significance ratings.
- Objectives, targets and monitoring program(action plan) must be developed for those aspects that have rated high in terms of their significance
- Development of Objectives and Programmes must be conducted with the involvement of personnel responsible to implement the actions
- Objectives and Targets must follow a SMART(Specific , Measurable, Attainable, Realistic and Time-bound) approach
- To assist in the significance rating of aspects an OMOP4019 can be consulted.

The organization shall establish environmental objectives at relevant functions and levels, taking into account the organization's significant environmental aspects and associated compliance obligations, and considering its risks and opportunities. The environmental objectives shall be:

- a) consistent with the environmental policy;
 - b) measurable (if practicable);
 - c) monitored;
 - d) communicated;
 - e) Updated as appropriate.
- The organization shall maintain documented information on the environmental objectives

3.11.5 Competence

- Service providers must:
 - o Determine the necessary competence of person(s) doing work under their control that can affects the environmental performance and its ability to fulfil its compliance obligations by developing a training matrix. The training needs analysis should strongly consider training employees on their environmental aspects and environmental management system requirements for the particular working area.
 - o Determine training needs associated with its environmental aspects and its environmental management system;

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- o Where applicable, take actions to acquire the necessary competence, and evaluate the effectiveness of the actions taken. e.g Applicable actions can include, for example, the provision of training to, the mentoring of, or the re-assignment of currently employed persons; or the hiring or contracting of competent persons.
- o ensure that these persons are competent on the basis of appropriate education, training or experience;
 - The organization shall retain appropriate documented information as evidence of competence.
 - Records for any competence , training (e.g. courses, etc.) conducted or attended must be retained for future references
 - Matla Power Station's Competence, Training and Awareness procedure (OMOP 4017) should be complied with.
- o Service Providers who are unable to comply with the station's procedure mentioned above must develop their own procedure which addresses all the requirements stipulated in section 7.2 of 1S014001 standard

3.11.6 Awareness

- Responsible personnel (SHEQ officer,) must conduct awareness training on:
 - o The Environmental policy,
 - o Significance aspects and related actual and potential environmental impacts associated with their work,
 - o Their contribution to the effectiveness of the environmental management system, including the benefits of enhanced environmental performance;
 - o The implications of not conforming with the environmental management system requirements, including not fulfilling the organization's compliance obligations.
- SHEQ officers, must sensitize employees in their working areas about their roles and responsibilities
- Records for any awareness training (e.g. awareness on local procedures, aspects & impacts, Environmental policy, etc.) conducted or attended must be retained for future references

3.11.7 Operational planning, activities, products, services and controls

All service providers must identify and plan for their activities which are associated with significant environmental aspects.

- All the measures that have to be taken to control significant environmental aspects or to control situations where their absence could lead to deviations from the policy, objective and targets must be documented in a procedure.
- Eskom departmental line managers and supervisors must ensure that operational control procedures in their working areas are communicated to all the service providers reporting to them.

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- Service Providers who are unable to comply with the station's Operational Control procedure must develop their own procedure which addresses all the requirements stipulated in section 8.1 of ISO14001 standard.

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• **Summary table of activities, products, services and their operational controls**

Mitigation Measures	Responsible	Action frequency
Access Control to Matla Power Station	Responsible	Frequency
• Activity/Aspect: Ineffective access control measures • Potential Impacts: Trespassing, drowning at the dams, major environmental incidences etc.		
Mitigations : - Note: Matla Power Station is located in the area identified by the National Key Point Act as one of the National High Priority Area which must be strictly controlled. Matla Power Station also runs an operation which involves hazardous facilities such as dams and machinery which requires induction before engaging. - Regular patrol and monitoring around Matla Power Station must be conducted - The access to the any area under Matla Management area must be controlled so as to restrict unauthorised personnel from entering the station. The employees in the station must retain their clock cards for identification. - All suppliers delivering hazardous chemical substances must produce the following: - o Consignor Competency certificate - o Safety Data Sheet of the chemical - o Transportation of dangerous goods certificate - o The vehicle should display the correct signages and emergency numbers - o The transporter must have spill kit within the vehicle - o The delivery route within site must be strictly adhered to	Protective services/All Contractors and Suppliers	Daily
- Regular maintenance of boundary fencing shall be ensured to prevent unauthorized access to the station, for public safety and security reasons.	Slurry OPS/Rotek Industries	
Waste Management	Responsible	Frequency

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• Activity/Aspect: Potential poor management of waste generated from various suppliers' operational activities • Potential Impacts: Visual impact, land pollution as well as pollution of water resources		
Mitigations : • Section 28 of the National Environmental Management Act (Act 107 of 1998) requires that everyone who has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent or remediate that pollution. • It is important for everyone to note that suppliers are responsible for waste generated at its premises from cradle to grave. • Cradle to grave approach basically mean that suppliers should be aware and monitoring all stages of waste management indicated below: - Monitoring stages on waste disposal/recycling process -Waste generation >>>>>on site temporal Storage>>>>>transportation to landfill/recycling site>>>>>waste treatment/destruction at the landfill site or recycling site.	Contractors and Suppliers	Daily
• N.B Matla has the responsibility to retain the following documents in relation to its waste disposal or recycling process. All contractors and suppliers taking waste outside the station must submit the following : -Waste manifest or proof of waste collection, -Proof of waste transporter compliance to legal requirements -Proof of waste received waste (including quantities) at the disposal/recycling site -Proof of safe disposal certificate at the disposal site or proof of recycled waste at the recycling facility.	All contractors and suppliers must submit the documents to Environment/Slurry OPS	As and when required
• Waste shall be separated into recyclable and non-recyclable waste as per Matla's waste colour coding system; and shall be separated as follows: - Recyclable waste - Green bin/skip - General waste/Domestic waste - White bin - Asbestos waste- Yellow bin - Hazardous waste – Red bin - Production waste (ash/coal waste) - Black bin	All suppliers and contractors	Daily

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- Any illegal dumping of waste is prohibited. Matla Environmental team will closely monitor this aspect. - The legal timeframe for storage of waste on site is 90 days - Littering and waste mixing is prohibited on site - According to National Waste Act, 59 of 2008, illegal waste dumping constitute an offence by law and if found guilty, a transgressor may be prosecuted. Further to above, National Norms and Standards for Storage of Waste must be complied with as stipulated on National Environmental Management: Waste Act, 2008 (ACT NO 59 of 2008). - Matla waste colour coding, containers are sufficiently and strategically located around Matla Power Station to handle various waste stream generated on the site.	All suppliers and contractors	Daily
At Matla Power Station, the waste contract is managed by Ops Slurry who should be consulted if there is any issue related to waste management in the station.	Slurry OPS	As and when required
- Responsible personnel for the particular working area must ensure that monitoring inspections to ensure compliance of this section of the EMP, Matla Waste Procedure and Legal requirements is achieved. - Responsible personnel must ensure that employees in their working areas are trained on the Waste Management Procedure (OMOP 4090) and training proof is available. Environmental Practitioner can be requested to come and assist during the training.	All Contractors and Suppliers	Daily
Mitigations for emergency ashing area		
- It is anticipated that at a power station of Matla's magnitude, certain technologies such as the ashing system will fail. - It is very critical that emergency ashing area complies with the requirements stipulated in the National Environmental Management: Waste Act (59 of 2008) ,Waste Storage Norms and Standards. - Ash is waste and shall be stored in the facility that is legally compliance. - The emergency ashing area that triggers the capacity threshold of 80 cubic metres as outlined in the	Rotek industries/Operating	Daily

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waste norms and standards shall be registered in accordance to the requirements stipulated in the said waste act. - The facility shall be impervious to prevent pollution and shall be designed is such a way that run-off from the facility does not access the storm water. - Ashing in an unregistered/ unauthorized facility which triggers any legislation is against the law and it therefore is a legal contravention. - Environmental section must be consulted before any emergency ashing is undertaken to ensure that the legal requirement are covered.		
Mitigations for handling Waste Oil		
- Waste oil shall be drained into 210L drums (not wheelie bins); thereafter the responsible person must arrange for the drums to be removed from the plant and be adequately stored at the FOB Oil Recycling area. - Waste oil drums may not be left at the plant as this leads to poor housekeeping and possibly drained to station drain leading to contamination. - In case the Recycling area is locked, security personnel at the gate shall be contacted for the keys. - Procedure for management of oil waste at the oil recycling area (OMOP 4090) must be consulted for finer detail on management of liquid oil waste. - Spill kits must be provided by the contractors working with these chemicals and it must be easily located by all employees	All Contractors and Suppliers	Daily
Punching Aerosol Cans		
- Waste transporter requires the aerosol cans to be punched before their transportation to disposal or recycling sites. - The operator of the punching bay must have relevant training.	All Contractors and Suppliers	Daily
Mitigations for handling Fluorescent tubes waste		
Fluorescent tubes waste is another type of waste that is very hazardous as it is carcinogenic (can cause cancer)	All suppliers and	Daily

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- Removal of Fluorescent tubes from different areas to the storage area must be done only by trained and certified personnel from Electrical Maintenance Department. - No one is allowed to crush fluorescent tubes at Matla Power Station. - Management of Fluorescent tubes at Matla Power station must follow OMOP 4090.	contractors to contact Electrical maintenance	
Water Management{ Dams. storm water. raw water. etc	Mitigation	Frequency
Activity/Aspect: Potential for poor management of water resource from various Matla' operational activities Potential Impacts : Ground and surface water pollution, soil pollution and depletion of natural water resource		
General mitigations - Matla Power station has boreholes located all around the ashing facilities and waste water dams, it is legal offence to temper with these monitoring poles - Although it may sometimes be a challenge to apply the ZLED policy at Matla Power Station due to the fact that some of the waste water dams are unlined, all are encouraged to apply this policy wherever practical.	Rotek Industry/ Slurry OPS	Daily
Mitigations for Dams management (clean and dirty water dams)		
It is prohibited to locate or place any residue deposit, dam, reservoir, together with any associated structure or any other facility within the 1:100 year flood-line or within a horizontal distance of 100 metres from any watercourse or estuary, borehole or well, excluding boreholes or All wells drilled specifically to monitor the pollution of groundwater, or on water-logged ground, or on ground likely to become water-logged, undermined, unstable or cracked.	All contractors and suppliers	Daily
- Measures to ensure confinement any unpolluted water to a clean water system, away from any dirty area must always be investigated and implemented wherever practical. - No person may use any residue or substance which causes or is likely to cause pollution of a water resource for the construction of any dam or other impoundment or any embankment or for any other purpose which is likely to cause pollution of a water resource.	All contractors and suppliers	Daily

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- All water arising within any dirty area shall be collected into waste water dams such as Unit 7 dam, Ash water return north and south. - Dirty water dams holding capacity shall be in such a way that it would not spill into any clean water system. - All dams and associated infrastructure should be maintained in such a way that they may only overflow during 1:50 years rainfall. - Regular monitoring of the dam level and infrastructure functionality must be done. Records in this regard must be retained for future		
- All dams must be maintained on the healthy freeboard. A minimum acceptable freeboard on dams is at least 0.8m. - Dam areas must be fenced off and access should be strictly controlled. - Signs to prohibit swimming or fishing must be erected at the dams' entry point	Rotek Industry/Slurry OPS	Daily
- Dams' capacity and pumping facilities must be closely monitored. - Any defect on the pumping capacity of the dams must be repaired immediately.	Slurry OPS/Maintenance	Daily
- Any increase of a dam height must not be done prior approval by the authorities. - Cleaning of dams' vicinity must be conducted at the continuous basis (litter, weeds, etc.) - In the event of dam pollution, overflow, etc. EOD must be consulted for them to immediately notify the Environmental section.	Rotek Industries/Slurry OPS	Daily
NB: Events such as dams overflowing and major oil spillage in the dam are considered emergency incidents and will have to be reported to the office of Water Affairs within 48 hours.	Rotek Industries/Environment/Slurry OPS/Chemical services	As in when required
Mitigations for Wetlands management		
- Matla Power Station has a few wetlands systems identified in the wetland delineation report. - The aforementioned report must be consulted to gain knowledge of exact locations of Matla Power	All Contractors and	As in when

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Station Wetlands. - Wetlands are protected by the National Water Act (Act No 36 of 1998) and as such, care should be taken to ensure that any activities should in no way disturb or damage or alter the characteristics of wetlands that may occur on any site. - No vehicular access is allowed in permanently wet areas. - No roads are to be cut through wetland systems as this may lead to erosion causing siltation of the wetland system. - Contaminants such as those carried through by storm water shall not be allowed to reach the wetland system; separating systems must be installed. - No littering or dumping of any sort of waste in a wetland system - New development taking place within 500m radius of a wetland shall have a water use licence prior; analysis to determine the impact shall be performed prior. - NB: In order to understand the list of activities which requires Water Use Licence before commencement, please refer to Section 21 a-k of the National Water Act, 36of1998.	Suppliers	required
Soil Erosion mitigations	Responsible	Frequency
Rehabilitation measures must immediately applied in a case where erosion was caused by site establishment, any activities done by contractor and water run-off within the working area. These may include re- vegetation, applying the erosion control berms, etc.	All Contractors and Suppliers	As in when required
Grass cutting and weeds growing within contractors will be the responsibility of the contractor to ensure grass cutting is done and good aesthetic appearance is maintained.	Site Established contractors.	As in when required
Management of Sewer pipes and Sewage Plant	Responsible	Frequency
Activity/Aspect: Potential for sewage leaks/spills during transportation and potential overflow of raw sewage at the treatment plant Potential Impacts: Ground and surface water pollution, and health impacts		

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Mitigations: • Sewage Treatment Plant (STP) area forms part of Matla Power Station's management area. Environmental management at Matla's STP must comply with all relevant mitigations stipulated in this EMP. • STP has a responsibility to ensure that each and every condition stipulated in the specific sewage treatment works permit issued to Matla is implemented. • Conditions stipulated in the DWA requirements for operating a Class D Sewage Treatment Works shall be implemented.	Sewage Treatment plant contractor	Daily
Operational mitigations: • STP operations such as the surge dam shall be closely monitored to prevent overflows especially during the rainy days. • It must be ensured that the minimum equipment operation guided by the legal requirements for Class D STP is maintained at the all the times. • Fixing of any defect raised for any equipment at the STP shall be prioritized. • Monitoring equipment for any measurements taken at the sewage plant must be calibrated and proof shall be retained on site. • Storm water run-off shall not be allowed to enter into the sewage plant system to prevent overflow of raw sewage into the sensitive receiving environment. • Ground water monitoring report shall be consulted to verify if the borehole adjacent to the sewage plant is not showing any potential leakage of the sewage. This report shall be used as another means of checking the integrity of the sewage plant structure. • Septic tanks must be removed and connected main sewage pipe work where practically possible. • Dropping of foreign objects (dust mask, socks, etc.) into the sewage network is not allowed as it causes blockages leading to environmental pollution. • Any sewage overflow due to block, congested, faulty, etc. network shall be repaired within 24 hours. • Any pollution of soil or surface due to sewage spillage or overflow must be rehabilitated by means of cleaning up the mess. • Blocked or overflowing sewer networks/tanks must be reported immediately to civil maintenance.	Sewage Treatment plant contractor /Chemical services/Maintenance and all contractors	Daily

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Conveyance of Materials, Effluent. Residues (e.g. ash. coal. oil. ash water. clean water. etc.)	Responsible	Frequency
Activity/Aspect: Potential spillage of the material, effluent, etc. Potential Impacts: Land pollution, surface and ground water pollution, depletion of water resource, public nuisance		
Mitigations: • Infrastructures and resources such as ash lines and conveyors, oil transfer lines, ash water return lines, sewage final effluent lines, raw sewer network lines, process water lines, transporting trucks etc. must be monitored closely for any leakage and spillages of the material or waste. • Any spillage or leakage must be clean up immediately and the damage must also be repaired immediately. • Defects identified at any portable water lines also need to be reported and fixed immediately • Testing of the underground infrastructure must also be undertaken whenever it is suspected that the throughput is not matching the output at the receiving point. • Environmental section must also be notified for any significant spill, leakage and system defects. Note: pipelines are colour coded, no person is allowed to drink from pipelines that are not suitable for drinking	All suppliers and Contractors,	Daily
Toilets and Other Ablution Facilities	Responsible	frequency
Activity/Aspect: Potential usage of incorrect ways of self-relief leading to pollution Potential Impacts: Ground and surface water pollution, and health impacts		
Mitigations • Matla Power Station has ablution facilities strategically located across the station which are for servicing all personnel working at the station. • It is strictly prohibited for employees or contractors to help themselves anywhere outside the ablution or toilet facility (e.g. it is not allowed to use a tree or a building to relieve oneself)	All Contractors and Suppliers	Daily

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- For those employees working at the remote areas or far away from the fixed toilet facilities, mobile chemical toilets shall be provided to them. - For all mobile toilets facilities the following information must be submitted to environmental department: - Consignor Competency certificate - Safety Data Sheet of the chemical - Transportation of dangerous goods certificate - The vehicle should display the correct signages and emergency numbers - The transporter must have spill kit within the vehicle - The delivery route within site must be strictly adhered to		
Hazardous/ flammable substances	Responsible	frequency
Activity/Aspect: Potential water pollution Potential Impacts: Ground and surface water pollution, and health impacts		
- The following are examples of types of hazardous substances - Flammables/combustibles- Cryogenics - Corrosive base- Pyrophoric - Corrosive acids- Oxidizers & Explosives - Toxics- Compressed gases - Highly toxics-water reactive The following minimum requirement serve as a guide for the management of hazardous substances: - Label storage areas according to the type of chemical family or hazard classification found there. - The volumetric capacity of the bunded area shall be not less than the greatest volume of product that can be released from the largest tank in the bunded area, assuming that it is a full tank. The bund facility containment capacity should be at least 110% - Inspect storage areas at least biannually. - Keep storage areas well lit, appropriately ventilated, and at a consistent, cool temperature. - Keep emergency equipment such as spill kit, fire extinguishers handy and in good working order.	All Contractors and Suppliers	Daily

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• Confine chemical storage areas so that leaks or spills are controlled. Prevent chemicals from running down sink, floor, or storm water drains. Clean up spills and drips immediately. • All hazardous chemicals must be clearly labelled for the benefit of current users, emergency personnel, and future users. • Unknown chemicals can be expensive to dispose of. Make sure all labels are legible and in good condition. Repair or replace damaged or missing labels. • Original manufacturers' labels must not be removed or defaced. • Safety Data Sheets (SDSs) for all hazardous chemicals must be available and accessible to anyone working with these chemicals. • Materials such as fuel, oil, paint, etc. must be sealed and stored in bunded areas or under lock and key, as appropriate, in well-ventilated areas. • Sufficient care must be taken when handling these materials to prevent pollution. Training on the handling of dangerous and toxic materials must be conducted for all staff prior to the commencement of construction. SDS can be used to guide the training. • In the case of pollution of any surface or groundwater, Matla Environmental Practitioner must be informed immediate!		
Hazardous Substance Spills and Leaks Response & Hazardous Material Off-loading	Responsible	frequency
Activity/Aspect: Potential for inadequate containment of hazardous substances spills and leaks during leaks and spills events Potential Impacts: Ground and surface water pollution, air pollution and health impacts		
Mitigations: Hazardous substance spills and leaks response • Individual handling hazardous substances must be trained on the particular substance SDS and proof must be available. SDS has a detail of the procedure to follow in case of spillage or leakage. • Where possible, leak or spills detection technologies should be employed (e.g. alarms).	All Contractors and Suppliers	As in when required

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• In case of a major leak or spillage of a hazardous substance, EOD must be contacted immediately on 6666 for them to contact all relevant parties including environmental personnel to the scene. • Evacuation and demarcation of the scene will also follow immediately depending on the nature of the leak or spillage. • The responsible person shall first ensure that human life is not in danger. • Preventative measure to prevent contamination of sensitive environmental areas such as the storm water drains shall immediately be employed. • Spill kits must be provided by the contractors working with this chemicals and it must be easily located by all employees • NB: Reference should be made to specific substance procedures such as Matla Emergency Preparedness Response Plan (OMOP 4010),		
Hazardous Material Off-loading bay		
Mitigations • The responsible person must understand the SDS for the chemical that has to be off-loaded in order to for that person to know how to handle any spillage during off-loading. • Any spillage must be managed immediately. - All suppliers delivering hazardous chemical substances must produce the following: - o Consignor Competency certificate - o Safety Data Sheet of the chemical - o Transportation of dangerous goods certificate - o The vehicle should display the correct signages and emergency numbers - o The transporter must have spill kit within the vehicle - o The delivery route within site must be strictly adhered to	All Contractors and Suppliers	As and when required
Refuelling of Diesel and Petrol		
• Any electrical or petrol-driven pump shall be equipped and positioned so as not to cause any danger of ignition of the product. • All plant and vehicles must be refuelled at a designated re-fuelling area.	All Contractors and Suppliers	Daily

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This area should have a sloped concrete surface leading to a collection sump to contain spillages. If this is not practical, drip trays must be placed below the filling point during re-fuelling activities.		
Management of Petroleum Underground storage tanks (UST) and underground pipe integrity testing requirements (e.g. Matla Power Station's filling station)		
Activity/Aspect: Potential spills and leaks during storage Potential Impacts: Ground and surface water pollution		
Mitigations: - To prevent environmental pollution, each submersible pumping system shall have a leak detector that checks the integrity of the pipework on the pressure side of the pump at a minimum leak rate of 11,5 L per hour at 70 kPa. - Tank and pipe integrity testing shall be carried out in the following instances : - Following installation of a new UST and associated underground pipework or following repair, maintenance or upgrade of an existing UST or underground pipework (or both). - Testing shall be carried out prior to burial of the installation; - For more detail on the management of underground tanks, SANS 10089-3:2010 must be consulted.	All Contractors and Suppliers	As in when required
Management of polychlorinated biphenyls (PCB) Materials and PCB Leaks & Spills	Responsible	Frequency
Activity/Aspect: Potential spills during, stripping ,scrapping and storage Potential Impacts: Ground and surface water pollution, soil pollution		
Mitigations: - It is important to note that although oil and equipment at level 3 (<50 ppm) and below are considered non-PCB materials in accordance with the Stockholm Convention on Persistent Organic Pollutants, the strategy within Eskom is to ultimately work towards achieving level 0 PCB. - The management, handling and disposal of PCB will be done in accordance with the SANS 0290: 2008: Mineral Insulating Oils -Management and Handling of Polychlorinated Biphenyl (PCB). NB. If the PCB content of a dielectric fluid is unknown, it should be treated as PCB contaminated, until a sample is tested for verification. It is recommended that a sample of the fluid is obtained even if only a few droplets of fluid are available.	All Contractors and Suppliers	daily

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• All precautionary measures shall be taken to prevent materials containing PCBs from reaching storm drains sewers, drainage ditches, or any other place where water flows. • If a material containing PCBs does reach flowing water, storm, sewers or any inaccessible area, the first employee that arrives at the spill area shall immediately initiate notification procedures and measures to prevent any additional spill material from reaching water or land. • Barricades shall be placed around the contaminated areas to prevent pedestrians and vehicles from entering until the spill material is cleaned up and removed. • The contaminated area shall be continuously manned until the spill and all clean-up materials have been removed from the site or secured in drums		
Workshop equipment. maintenance and materials storage at Matla Power Station	Responsible	Frequency
Activity/Aspect: Potential for inadequate containment of hazardous substances spills and leaks Potential Impacts: Ground and surface water pollution, soil pollution		
Mitigation: • Leaking equipment shall be repaired immediately or be removed from site to facilitate repair. • All potentially hazardous and non-degradable waste shall be collected and removed to a registered waste site. • Workshop personnel shall be aware of a closest location for an emergency spill kit to be used in case of a spillage. • The responsible personnel shall have practical knowledge of using emergency spill kits. • Significant spills (more than 5 litres and has accessed the storm water inlet) of hazardous substances must be reported to the Environmental Practitioner. • All personnel handling hazardous substances at the workshop must be trained on their SDSs. Proof must be available. • Storage of chemicals at the workshop must comply with the requirements stipulated under the section of this EMP which talks about storage of hazardous chemicals. • Where practical, all maintenance of equipment and vehicles shall be performed in the workshop • The Workshop supervisor shall ensure that in the workshop and other plant maintenance facilities	All Contractors and Suppliers	Daily

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where emergency plant maintenance may occur, there is no contamination of the soil or vegetation. - The workshop shall have a smooth impermeable floor either constructed of concrete or thick plastic covered with sufficient sand to protect the plastic from damage. - When servicing equipment, drip trays shall be used to collect the waste oil and other lubricants. Drip trays shall also be provided in areas where there are stationary plant (such as compressors) and for "parked" plant (such as scrapers, loaders, vehicles). - All vehicles and equipment shall be kept in good working order and serviced regularly. - Leaking equipment shall be repaired immediately. - All washing of the vehicles shall be undertaken in the workshop or maintenance areas, and these areas must be equipped with a suitable impermeable floor and sump/oil trap. - The use of detergents for washing shall be restricted to low phosphate/nitrate and low sussing-type detergents.		
Washing of Vehicles and plant at Matla Power Station	Responsible	Frequency
Activity/Aspect: Potential for hydrocarbons run-off to the storm water drains during washing of cars Potential Impacts: Ground and surface water pollution, soil pollution Mitigations: - Vehicle and operational plant shall not be washed anywhere in the station. - Only Eskom vehicles may use the designated wash bay such as the one at transport department. Detergents used at the wash bay should be environmentally friendly.	All Contractors and Suppliers	As and when required
Land & Bio-diversity	Responsible	Frequency
Activity/Aspect: Potential for disturbance of fauna and flora Potential Impacts: destruction of fauna! and flora species Mitigations: Fauna management (animals) - All activities at Matla Power Station must comply with: - The regulations of the Animal Protection Act, 1962 (Act No.71 of 1962).	All Contractors and Suppliers	As and when required

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- Intentional killing of any animal is not permitted as animal species are a benefit to society. - Poaching of animals is illegal. - In the case of a problem animal e.g. a cats, bees and snakes environment must be called in to safely relocate the animal and bees. (OMOP 4379 can be consulted)		
Flora Management (Vegetation)		
• Locally indigenous plants must be used in the landscaping of the station • Plants that are proclaimed as problem plants or noxious weeds must be excluded from the landscaping plan and these must be removed immediately, should they occur on site. • A responsible person for the particular working area must ensure that the landscaping contractor is notified about any invasive vegetation that needs to be eradicated. • Employees handling the flora management chemicals must be well trained on the SDS for the particular chemical. • Before any activities can commence within any undisturbed and vegetated area at Matla Power Station, a search and rescue operation for rare and endangered fauna species led by the Environmental Practitioner must take place prior to vegetation clearance. A nursery must be established should the need arise. • No unauthorized parking and access routes on vegetated area shall be allowed to reduce the station's activity footprint. • Personnel who unnecessary disturb a vegetated area shall be responsible on rehabilitating those areas by means of ripping and mulching in order to ensure recovery of the natural vegetation cover. • No open fires shall be allowed on site under any circumstances.	All Contractors and Suppliers	Daily
Soil management		
• Topsoil must be deemed to be the top layer of soil containing organic material, nutrients and plant grass seed. For this reason it is an extremely valuable resource for the rehabilitation and vegetation of disturbed areas. • Environmental section can be contacted if there is soil that requires storage at the station and if	All Contractors and Suppliers	Daily

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there is a need for topsoil for rehabilitation purposes .		
Heritage Requirements	Responsible	Frequency
Activity/Aspect: Potential damage of heritage resource Potential Impacts: destruction of protected resources		
Mitigations: • In terms of the National Heritage Act, 1999 (Act No. 25 of 1999), personnel around Matla Power Station must be alert and must inform the Matla Environmental Office should they come across any findings of heritage resources within 12 hours if the area has been removed(e.g. ash dams construction) . • Should any archaeological artefacts be exposed during any activity taking place in the station, work on the area where the artefacts were found shall cease immediately and the South African Heritage Resources Agency shall be notified within 24 hours. Under no circumstances shall archaeological artefacts be removed, destroyed or interfered. • Any archaeological sites exposed during any activity must not be disturbed prior to authorisation by the South African Heritage Resources • Agency on the appropriate provincial heritage resource agency. Note: There are graves in the ash dam which are protected by Heritage Act, all precautionary measures must be done around this areas, Environmental department must be contacted should there be any construction taking place nearby this sites	All Contractors and Suppliers	Daily

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3.12 Records

Records necessary to ensure compliance to the EMS shall be retained by the contractor and must be retrievable on site to ensure availability on site.

3.13 Distribution

Will be available on "EDMS" and "G drive" (G:\data\omop) as soon as the document is signed by all stakeholders.

3.14 Annexure

Annexure A – Environmental Contractors Assessment Form

4. Acceptance

This document has been seen and accepted by:

Name	Designation
B Moyo	General Manager
T Gininda	Operating Manager
L Masote	Engineering Manager
P Potgieter	Risk and Assurance Manager
R Mokobodi	Environmental Manager (Acting)
M. Nkuna	Procurement Manager
J Khoza	Production Manager
O Malele	Finance Manager
P Maree	Electrical Consultant
L Ngqendesha	Project Manager (Acting)
B Mohale	Outside Plant Production Manager
N Nxumalo	Outside Plant Production Manager
J Ngoepe	Production Manager
S Motha	Services Manager

5. Revisions

Date	Rev.	Compiler	Remarks
February 2018	03	KB Moeng	Addition of context of organisation, Environmental management plans, and policy statement

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Date	Rev.	Compiler	Remarks
May 2018	04	K.B Moeng	To align waste management for contractors with the station procedure
February 2018	3	K.B Moeng	Addition of context of organisation, Environmental management plans, and policy statement
March 2017	2	K.B Moeng	To ensure that the environmental commercial process are included in the procedure.
December 2014	1	K.B Moeng	To update in line with current contractors operations and ISO14001
2013	0		Original issue

6. Development Team

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

- Bethuel Moeng
- Refilwe Mokobodi
- Mbali Mhlana

7. Acknowledgements

N/A

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Environmental Contractors Assessment Form
ANNEXURE A

Name of Contractor: _____ Date _____ of _____ Assessment:

Responsible Person (Contractor): _____ Assessed _____ by:

Outage and Project	
Maintenance	
Other	

If _____ other, _____ please _____ specify:

TASK LIST	Y	N
1. Scope (Explain a brief scope of the contractor): _____ _____ _____		
2. How long will the contractor work at Matla Power Station? _____		
3. Are there any hazardous chemical substances to be used? Example: oil, grease, SAF-Heavy, Hydrochloric acid, cleaning material, pesticides etc. If yes, list them or attach a 16 point form MSDS. _____ _____ _____		
4. Will the contractor generate any waste? If yes, contractor must notify Matla and specify the type of waste. Example hazardous, domestic etc. _____		
5. Will the contractor need the hazardous chemical substance storage area? _____		
6. Will the contractor need the workshop to execute the work? _____		
7. The work to be conducted is it due to the requirements of Matla Permit or ROD (Record of decision), Example: Water Use License, Waste Permit, etc. _____		
8. Will the contractor be transporting any waste? If yes the transportation and disposal certificate must be supplied to Matla Environmental department _____		
9. Is the contractor aware of the non-conformance procedure OMOP 2255 , polluter pays principles? Note: Corrective actions will be the liability of the contractor. _____		

Assessor Signature _____

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ENVIRONMENTAL FOR CRITERIA FOR EVALUATION

ANNEXURE B

Environmental Objective Criteria		
Category A: Contractors	Yes/No	Comments
All contractors working for and on behalf of Matla Power Station on a once off (supply and delivery) or outage programs and with their activities which might not cause potential harm to the environment as per scope of work by environmental practitioner professional discretion. Assessment for these contractors shall be done by completing the Environmental Contractor Assessment form, If there is any yes to the questionnaire then the Environmental Officer must be notified to conduct a proper assessment on the contract. These suppliers or contractors must adhere or adopt the Contract Manager' Environmental Aspect and Impact register and the management thereof		
Completion of Environmental Contractors Assessment Form.		
Sign Contractors commitment and indemnity letter		
OR ISO14001 certified with valid certificate		
Category B: Contractors	Yes/No	Comments
All contractors performing work for or on behalf of Matla Power Station and that their activities might cause harm to the environment as per scope of work by environmental practitioner professional discretion. These contractors are required to submit minimum requirements of ISO14001:2015, which are:		
Environmental Policy		
Aspects and Impacts register associated with the scope of work		
Operational Controls		
Compliance obligations		
Completion of Environmental Contractors Assessment form		
Sign Contractors commitment and indemnity letter		
OR ISO14001 certified with valid certificate		

Evaluator signature

Name _____

Date:

Signature _____

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**HOUSEKEEPING
ANNEXURE C**

CHECK

SHEET

ASSESSMENT / INSPECTION DATE:

AREA OF INSPECTION:

PERSONNEL UNDERTAKING INSPECTION:.....

Contractors/Department:			
	Questionnaires	Yes/No	Comments / reporting to environmental management date / defects and mods / others.
1. Observative plant check	Is there visible and audible steam and water leaks?		
	Any Visible and audible oil leaks?		
	Any Visible and audible dust leaks?		
	Any Visible and audible ash leaks?		
2. Waste Management non-conformances.	Is Waste separation practiced: Waste disposed according to colour coding and in correct containers?		
	Are waste containers sufficient?		
	Are Coal rejects in plant removed according to procedure?		
	Are all hazardous substances managed according to procedure?		
	Is Asbestos disposed according to procedure?		
	Paper recycling practices adhered to?		
	Is oil recycled according to procedure?		
	Are waste bins emptied on regular basis?		
	Are wastes stored in containers which are durable and which are able to prevent spillage or leakage of into the environment?		
	Is proper on-site collection of bins provided to prevent odour and reduce presence of vectors?		
	Is scrap recycling bins sufficient?		
	Are the skips/ bins always closed except when necessary to dispose or remove the waste?		
	Is the site kept clean and tidy? (E.g. Storage of materials or waste not in the passageways or entrances litter free, good housekeeping)?		
	Are construction wastes (building rubble wastes) removed off site regularly?		
	Are asbestos wastes handled by registered professionals?		
3. Water pollution management	Are oil drums / equipment provided with drip trays?		

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	When there is any oil spillage, Is clean- up of the contaminated soil done immediately?		
	Are bund walls in good condition (e.g. not filled with rainwater, overflowing, stained, damaged or cracked)?		
	- Are the drums stored in a such manner that: - Recovery of spilt material is possible? - Absorbent material is on hand?		
	Is updated Material Safety Data (MSD's) easily accessible on site i.e. not more than five years old)?		
	Are the staircase and holding rails free of diesel or oil?		
	Is the quantity of petroleum products / liquid chemicals stored on site known?		
	Are proper measures to control oil spillage during maintenance or to control other chemicals spillage prior to commencement of work taken? (e.g. provide drip trays)		
	Are chemicals stored and labelled properly?		
	Are spill kits / sand / saw dust used for absorbing chemical spillage readily accessible?		
	Are spill kits / sand / saw dust used for absorbing chemical spillage removed immediately from the floor to rightful bin?		
	Chemical containers or drums unsafely stacked or stored in close proximity to storm water drains?		
	Is any discharge of oil and grease or any noticeable pollutant into any watercourses or on the ground monitored?		
	Is water pipe leakage and wastage prevented?		
4. Dust control	Are stockpiles of dusty materials (size with more than 20 bags cement) covered or watered?		
	Are all vehicles carrying dusty loads covered /watered over prior to leaving the site?		
Environmental integrity checklist: Reporting of non-conformances.			
5. Any activity that might impact on resources.	Are there any activities impacting on water usage and integrity?		
	Are there any activities impacting on soil and land, e.g. coal dust, minor erosion?		
	Are there any activities impacting on air?		
	Are there any activities impacting on vegetation?		
6. Culture aspects	Are non-conformances and incidents reported?		

Comments:

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**CONTRACTORS COMMITMENT AND INDEMNITY LETTER
ANNEXURE D**

Name of Contractor: _____
Scope of Work and duration of the
contract _____

Matla Power Station's(MPS) is certified to ISO14001, therefore its top management have committed to continually maintain and implement an Environmental Management System (EMS) to effectively manage the environmental aspects of the station's activities, products and services, within the defined scope. MPS's top management is also committed to the protection of the environment through prevention of pollution and minimizing environmental degradation. MPS will continually improve the EMS in order to enhance its environmental performance and to fulfil all applicable compliance obligations.

I undersigned, _____ on behalf
of _____ hereby commit to the following:

1. Establish, implement and maintain an Environmental Management System that is consistent with the framework as described in ISO14001:2015 Standard;
2. Fulfill all its compliance obligations Ensure that they manage their environmental impacts and comply with all operating requirements and conditions required by legislation relevant to environmental management including but not limited to licenses, sections of the acts and regulations, development approval, guidelines operating procedures, legislatively defined management plans reports and agreement; and other requirements within the station.
3. Set performance indicators, which will be reviewed regularly to measure our environmental performance to ensure continual improvement;
4. Identify environmental risks and opportunities, setting and reviewing environmental objectives and targets for our significant aspects and develop appropriate environmental management programmes to achieve our intended outcome;
5. Provide necessary training and awareness for its employees;
6. Communicate the Environmental Policy to persons working for and on behalf of Matla Power Station;
7. Provide adequate resources necessary to achieve and sustain effective environmental management;
8. Ensure fully compliance with the environmental operational controls and planning as per OMOP 4402
9. The polluter pays principle: The contract manager will ensure that the last payment is processed in conjunction with the last housekeeping check sheet (refer to). The supplier and contractor manager will conduct an assessment of the state of the environment at a provided/designated site and submit the check sheet (Annexure C) to environmental department before commencement of work. At the end of the contract period, assessment will be conducted again. Any housekeeping or waste related findings will be on the account of the supplier.
10. The supplier shall maintain an Environmental Management System File as a proof of compliance, based on ISO 14001.

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Site Manager

Date

Signature

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