

	<p style="text-align: center;">Work Instruction</p>	<p style="text-align: center;">Group Capital</p>
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Title: **Medupi Environmental Communications Work Instruction**

Document Identifier: **348-275237**

Alternative Reference Number: **200-34832**

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

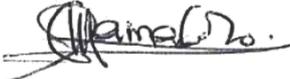
Functional Area: **Environmental Management**

Revision: **9**

Total Pages: **20**

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Disclosure Classification: **Controlled Disclosure**

Compiled by	QA, Interface & Governance Review	Functional Responsibility	Authorized by
			
<p>S. Mamabolo Senior Advisor Environmental</p>	<p>B. Mgidlana Project Quality Manager</p>	<p>N. Khuzwayo Safety, Health & Environmental Manager</p>	<p>Z. Shange General Manager: Medupi GC</p>
<p>Date: 01/10/2024</p>	<p>Date: 2024/10/02</p>	<p>Date: 02/10/2024</p>	<p>Date: 2024/10/09</p>

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1. Introduction

Environmental Management Systems requirements stipulated that Team Medupi (TM) shall establish, implement and maintain processes for internal and external communications indicating what will be communicated, when to communicate and methods that will be used. When establishing communication process compliance obligations and complaints were considered.

2. Supporting Clauses

2.1 Scope

This includes all construction activities on the physical Medupi Power Station Project Site property, as well as the footprint of adjacent properties where related construction activities are conducted.

This procedure applies to all existing or planned activities, products and services at the Medupi Power Station Project (construction and commissioning stages), under normal, abnormal and emergency conditions, as well as to employees and contractors.

This document describes key communications protocols applicable on the Medupi Project Construction Site.

2.1.1 Purpose

The purpose of this procedure is to:

- Define the Communication process so as to ensure that all incoming and outgoing communications are done through the proper channels and reach the appropriate parties.
- Provide for the effective and efficient Communication, Responding, and capturing of Environmental Communications.
- Define processes employed to ensure effective Environmental Consultation and Participation.

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

This plan shall be effective from date of approval.

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] 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
- [10] 348-631731 Record of Decision for the Medupi Project
- [11] 348-860847 Procedure for the Identification and Assessment of Aspect and Impacts
- [12] 348-694924 Environmental Legal or Other Requirements Procedure
- [13] 348-693723 Environmental Incident Management Procedure
- [14] 348-687105 Procedure for the Identification and Application of Environmental Operational Controls
- [15] 348-687021 Procedure Handling Media Related Matters

2.2.2 Informative

- [1] ISO 14001:2015 EMS Management Systems
- [2] ISO 9001 Quality Management Systems - Requirements

2.3 Definitions

Term	Explanation
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.
Environmental Monitoring Committee (EMC)	A Committee representing Interested and Affected Parties and is constituted per requirements of the Medupi Power Station Record of Decision. The independent ECO interfaces directly with the EMC. TM provides input to the EMC as and when requested by the ECO.
Interested and Affected Party(ies)	Person or group concerned with, or affected by, the environmental performance of Team Medupi.

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2.4 Abbreviations

Abbreviation	Explanation
BSO	Behavioural Safety Observation
ECO	Environmental Control Officer
EMC	Environmental Monitoring Committee
EMS	Environmental Management System
I&AP(s)	Interested and Affected Party(ies)
RoD	Record of Decision
SEA	Senior Environmental Advisor
SHE	Safety, Health and Environment
SPO	"Smart Plant Operation" – Eskom formal Document repository and tracking system
TM	Team Medupi
UM's	Unit Area Managers

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 Assurance Department	TM Communication & Stakeholder Management Department	TM Contract Mangers	TM SHE Manager	TM Environmental Practitioners	Contractors	ECO
Receives Contractor Documentation through SPO				R	C	C	I	I
Capture pertinent data on Communications Register					A	R		I
Compiles Communications from/to I&APs and provide response	A	I	I	C	A	R	C	C
Issue of Contractual notices and letters pertinent to environmental matters	A			A	R	R	I	I
Receives Complaints from I&APs and provides information thereon	A	I	I	R	I	C	I	R
Interface with EMC			I	A	R	R	R	R
Statutory /Regulatory communications	I	I	I			R		
Generates internal Communications					A	A	R	
Contractors SHE Meetings/Forums	I			C	A	R	C	C

2.6 Related/Supporting Documents

Related documents amongst other include:

- a) Environmental Communication Register
- b) Minutes of meetings Contractors SHE Meetings
- c) Quarterly EMC meetings

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3. Document Content

3.1 Process Map / Flowchart

Not Applicable

3.2 Environmental Communications

- All electronic forms of communication sent from the TM Environmental Department will be copied to the communal environmental email address: MedupiEnvironment@eskom.co.za. This email address will serve as the communications register internally.
- The Project significant Environmental Aspect and Impact Register shall be communicated to external stakeholders upon request.

3.3 Formal Project Communications from Contractor(s)

- The Contractor issues formal Communications through its Document Control functions.
- The applicable Environmental Practitioner receives communication via Document Controller or relevant Contract Manager.
- TM Environmental Practitioner responds to such communications, via the relevant Contract Manager within stipulated timeframes.
- Such Formal Project communication to Contractors shall be done in writing (Letters with SPO number), and the Environmental Practitioner may consult with the SHE Manager and Contract/Project Manager when compiling response.

3.4 Communications from External sources (Non-Contractors)

- All environmental related communications from I&APs (non-contractors and external) to the Team Medupi should be provided/forwarded to the TM SHE Manager/Environmental Practitioners.

Note: In line with the requirements stipulated on the Environmental Management Plan, the appointed Independent ECO receives, registers and responds to environmental complaints from I&APs.

- TM SHE Manager/Environmental Practitioners captures include MedupiEnvironment@eskom.co.za when engaging.
- TM SHE/Environmental Practitioners determines type of communication (Complaints, Queries, Statutory/Regulatory, or Press/Media).
- Where the communication is a **Complaint**, the following process is employed:
 - TM SHE Manager/Environmental Practitioners responds to the complaint to ensure preventive and Corrective measures are implemented. Relevant updates is submitted to the ECO regarding the complaint to enable the ECO to provide feedback to the complainants.

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- Once the complaint has been suitably cleared or answered, TM SHE Manager/Environmental Practitioners shall provide records of such to the ECO to issue formal response to the relevant complainants.
- Complaints will be discussed during the Environmental Monitoring Committee Meetings.
- Where the communication is a Query (request for information), the following process is employed:
 - TM SHE Manager/Environmental Practitioners shall formulate a response within 48 hours of receipt of such.
 - Where the query is related to any other function or activity (e.g. Project Schedule, construction activities etc.) within the Medupi Project Team, such shall be referred to the TM Communications Department.
- No member of TM Environmental Department shall interact directly with any Press/Media organisations. All such approaches or requests shall be directed to the TM Communications and Stakeholder Management Department.
- Where the communication emanates from a Statutory or Regulatory body:
 - TM SHE Manager/Environmental Practitioners shall forward all such communications to the Medupi Assurance Department, as well as the TM Communications and Stakeholder Management Department.
 - Response to Statutory or Regulatory body communications shall be at the discretion of the TM Communications and Stakeholder Management Department, in consultation with the TM SHE Manager/Environmental Practitioners, as well the relevant Eskom Assurance functions.
 - All formal communications to external parties (e.g. statutory/Regulatory bodies) must be registered on the Environmental External Communication Register (348-362543).

3.5 Communications generated by the TM for consumption on the Medupi Project

- TM Environmental departments shall, on a regular basis, issue environmental awareness topics. These environmental awareness topics shall be compiled according to Eskom applicable documents. These topics may contain information regarding (amongst others):
 - Environmental Awareness Material.
 - Identified Environmental Aspects or Impacts.
 - Lessons learnt arising from non-TM Environmental Incidents.
 - Environmental Operational Controls.
 - Environmental Contractual obligations.
 - Trends identified from BSO Observations.
 - Trends identified from minor environmental incidents.
- Legal update information/awareness topic may be generated as and when required (i.e. when legal updates impact site activities) based on information received from Eskom Head Office or appointed service provider.

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- Ad-hoc awareness material may be generated in cases of on-site:
 - Major Environmental Incidents
 - Trend showing failure to report and close incidents within required timelines.

Awareness material will amongst others include:

- A brief description of events.
- Lessons learnt.
- Root Causes.
- Corrective and Preventive Actions identified.
- All environmental awareness shall be shared through MedupiEnvironment@eskom.co.za and contractually where necessary.
- Communications, within the Environmental Team as well as between the Environmental Team and the Project Team and ECO Team are illustrated Appendix B.

3.6 Communications generated by the TM for consumption outside of the Medupi Project

- Communications arising from Emergencies and Incidents to Interested and Affected parties shall occur via the relevant Procedures.
- Where the need for generation of Communication to I&AP(s) exists, the SHE Manager shall compile such Communication and register such on the Environmental External Communications Register (348-362543).
- Where such communication is related to environmental matter, the SHE Manager shall provide such to the ECO and the Communications and Stakeholder Management Department for review and distribution.

3.7 Environmental Management Consultation and Participation

- Monthly Contractors SHE Meetings are chaired by the SHE Manager/SEA attended by TM and Contractors HSE/Environmental Practitioners are held. This platform is used to report and discuss Environmental performance and compliance. In some cases, Senior Management are also invited to attend.
- Contractors Environmental Meetings are held on a regular basis as the need arises such meetings are chaired by the SHE Manager/SEA/Contract Manager depending on the point to be discussed. Such meetings are amongst others attended by ECO, TM Environmental Practitioners as well as designated environmental resources of all contractors.
- An Environmental Monitoring Committee (EMC) exists representing I&APs as per requirement of the RoD is established and TM SHE Manager/Environmental Practitioners provides inputs as requested.
- **Note: EMC agendas and minutes are distributed by the ECO, which acts independently from Medupi Project Team**

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- Actions arising from the above consultative meetings are tracked by the TM SHE Manager/Environmental Practitioners, through use of the Procedure for the Handling of Non-conformities and Corrective and Preventive Action, where applicable.
- Environmental matters are also discussed during progress meetings held with Contractor's.

3.8 Records

The following quality records are utilised to record necessary process data required to verify process conformity:

- Internal Communications (environmental awareness material, documents, responses MedupiEnvironment@eskom.co.za.)
- Minutes of Contractors SHE Meetings
- Minutes of Contractors Environmental Meeting
- Minutes of the quarterly EMC meetings

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. The Process Owner shall be accountable and assign the responsibility at the frequency as indicated below, documented as part of the EMS measurement, analysis and improvement initiative.

Table 2: KPA's/KPI's

Key Performance Area	Key Performance Indicator	Target	Measure Frequency	Responsible	Record
Environmental communications from I&AP's	Communications acknowledged within 24 hours of receipt	Register all I&AP's complaints received	Per communication	TM SHE Manager	Environmental Communications Register and Complaints Register
	Clearance of Communications within 7 days of receipt	Provide respond within with 7days upon recieval			
Environmental Awareness increased	All relevant Environmental Incident Lessons Learnt and Corrective Actions communicated internally and to Contractors	Proof showing communications shared through Medupi Communications or Medupi Environment emails	Ongoing	Environmental Practitioners	Proof showing communications shared through Medupi Communications or Medupi Environment emails

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HSE Participation increased	Environmental Meetings and HSE Management meetings occur at least quarterly	Attend and present environmental performance	Quarterly	TM SHE Manager	Minutes of the meetings
	Actions arising from above meetings undertaken in all cases	Address all concerns listed on the action list	Next meeting.	TM SHE Manager	Minutes of the meetings
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
Revision of Document	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	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.

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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 three yearly revision.

4.3 Training Requirements

No project specific training required to implement the process documented in this document beyond normal job function.

5. Acceptance

This document has been seen and accepted by:

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

6. Revisions

Date	Rev.	Compiler	Remarks
2024/09/09	9	S. Mamabolo	Three yearly review, with minor changes – change of management
2021/02/17	8	M.Boshomane	Three yearly review, also change in Project Director to GM Acting
2018/02/10	7	M. Boshomane	Annual Review including new ISO 14001:2015 and new document template changes

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7. Development Team

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

- Sakutanya Mamabolo
- Dovahani Mudzielwana
- Ntali Khuzwayo

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Appendix A – Process Self-Assessment Checklist

	MEDUPI POWER STATION PROJECT	Template Identifier	348-655890	Rev	2
		Document Identifier	348-10057141	Rev	1
		Effective Date	January 2022		
		Next Review Date	January 2025		
TITLE: Document Self-Assessment Checklist					

Discipline:		Applicable Document No.: 348-275237			Self-Assessment Date: 26 / 08 / 2024	
Item No	Ref Section	Self-Assessment Question	Compliant			Comment
			Yes	Part	No	
1	5.2.2	Are all electronic forms of communication sent from the TM Environmental Department copy the communal environmental email address: MedupiEnvironment@eskom.co.za This email address will serve as the communications register.	x			
2	5.2.2	Are the Project significant Environmental Aspect and Impact Register communicated to external stakeholders upon request?	x			Upon Request
3	5.2.1	Are formal Communications issued through Document Control functions?	x			
4	5.2.1	Does the Environmental Practitioner receive communication via Document Controller?	x			
5	5.2.1	Does the TM Environmental Practitioner respond to such communications via relevant contracts manager?	x			
6	5.2.1	Are such Formal Project communications to Contractors done in writing (Letters with SPO number)?	x			

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8	5.2.2	Are all Communications from I&APs (non-contractors and external to TM) pertaining the TM Environmental Department provided/forwarded to the TM SHE Manager/Environmental Practitioners?	x			
9	5.2.2	Does the TM SHE Manager/Environmental Practitioners capture detail of the Communication on Medupi Environmental Communications and MedupiEnvironment@eskom.co.za on the distribution list?	x			
10	5.2.2	Does the TM SHE Manager determine the type of communication (Complaints, Queries, Statutory/Regulatory, or Press/Media)?	x			
10.1	5.2.2	When a complaint is raised, are the correct process followed?				
10.2	5.2.2	<ul style="list-style-type: none"> TM SHE Manager/Environmental Practitioners respond to the complaint via the TM Procedure for the Handling of Non-conformities and Corrective and Preventive Action. 	x			Investigations are carried out for all complaints
10.3	5.2.2	<ul style="list-style-type: none"> TM SHE Manager/Environmental Practitioners provide regular updates to the ECO regarding the complaint so as to enable the ECO to provide feedback to the complainants? 	x			
10.4	5.2.2	<ul style="list-style-type: none"> TM SHE Manager/Environmental Practitioners provide records of resolution of such complaints to the ECO to issue formal response to the relevant complainants? 	x			
11	5.2.2	Where the communication is a Query (request for information), is the following process is employed:	x			
11.1	5.2.2	<ul style="list-style-type: none"> Does the TM SHE Manager/Environmental Practitioners formulate a response within 48 hours of receipt of such? 	x			
11.2	5.2.2	<ul style="list-style-type: none"> Where the query is related to any other function or activity (e.g. Project Schedule, construction activities etc.) within Team Medupi, is such being referred to the TM Communications department? 	x			
12	5.2.2	No member of TM HSE shall interact directly with any Press/Media organisations.	x			
12.1	5.2.2	<ul style="list-style-type: none"> Are all such approaches or requests directed to the TM Communications and Stakeholders Management Department? 	x			
13	5.2.2	Where the communication emanates from a Statutory or Regulatory body:				
13.1	5.2.2	<ul style="list-style-type: none"> Does the TM SHE Manager/Environmental Practitioners forward all such communications to the Medupi Assurance Department, as well 	x			

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		as the Medupi Communications and Stakeholder Management Department?				
13.2	5.2.2	<ul style="list-style-type: none"> Does the SHE Manager/Environmental Practitioners evaluate the communication to ascertain whether such constitutes a change in Legal or Other Requirements? 	x			e.g. the previous sand mining complaint
13.3	5.2.2	<ul style="list-style-type: none"> Are the Response to Statutory or Regulatory body communications at the discretion of the Medupi Communications and Stakeholder Management Department, in consultation with the TM SHE Manager, as well the relevant Eskom Assurance functions? 	x			
14	5.2.3	Do the TM Environmental department, on a regular basis, issue environmental awareness topic in relation to Environmental awareness?	x			
15	5.2.3	Are Legal update generated as and when required based on information received from Eskom or appointed Service provider?	x			
16	5.2.3	Are Ad-hoc bulletins generated in the case of:				
16.1	5.2.3	<ul style="list-style-type: none"> Major Environmental Incidents 	x			
17	5.2.3	In case of incident is the environmental awareness material/topic include the following:				
17.1	5.2.3	<ul style="list-style-type: none"> A brief description of events 	x			
17.2	5.2.3	<ul style="list-style-type: none"> Lessons learnt 	x			
17.3	5.2.3	<ul style="list-style-type: none"> Root Causes 	x			
18	5.2.3	<ul style="list-style-type: none"> Corrective Actions identified 	x			
19	5.2.3	Are all environmental awareness material/topic shared through MedupiEnvironment@eskom.co.za email?	x			
19.1	5.2.4	Communications generated by Team Medupi for consumption outside of the Medupi Project				
19.2	5.2.4	<ul style="list-style-type: none"> Do Communications arising from Emergencies and Incidents to Interested and Affected parties occur via the relevant Procedures? 	x			

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19.3	5.2.4	<ul style="list-style-type: none"> Where the need for generation of Communication to I&AP(s) exists does the SHE Manager compile such Communication and register such on the MedupiEnvironment@eskom.co.za? 	x			
20	5.2.4	<ul style="list-style-type: none"> Where such communication is Environmental-related, does the SHE Manager/Environmental Practitioners provide such to the ECO and the Communications department for review and distribution? 	x			
20.1	5.3.1	Environmental Management Consultation and Participation				
20.2	5.3	<ul style="list-style-type: none"> Are Contractors Environmental meetings held on a regular basis as the need arises, and such meetings chaired by TM SHE Manager and attended by ECO, TM Environmental Practitioners as well as designated environmental resources of all contractors? 	x			
20.3	5.3	<ul style="list-style-type: none"> Does an Environmental Monitoring Committee (EMC) exist, representing I&APs, to which the TM SHE Manager/Environmental Practitioners may provide inputs as requested by the ECO? 	x			
Comments:						
Self-Assessment by:		Name: Dovahani Mudzielwana	Position: Senior Environmental Advisor	Revision Required? (Yes / No)		Planned Revision Date:
				Yes		September 2024
Attendees: Sakutanya Mamabolo						

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Appendix B - TM Environmental External Communication Register

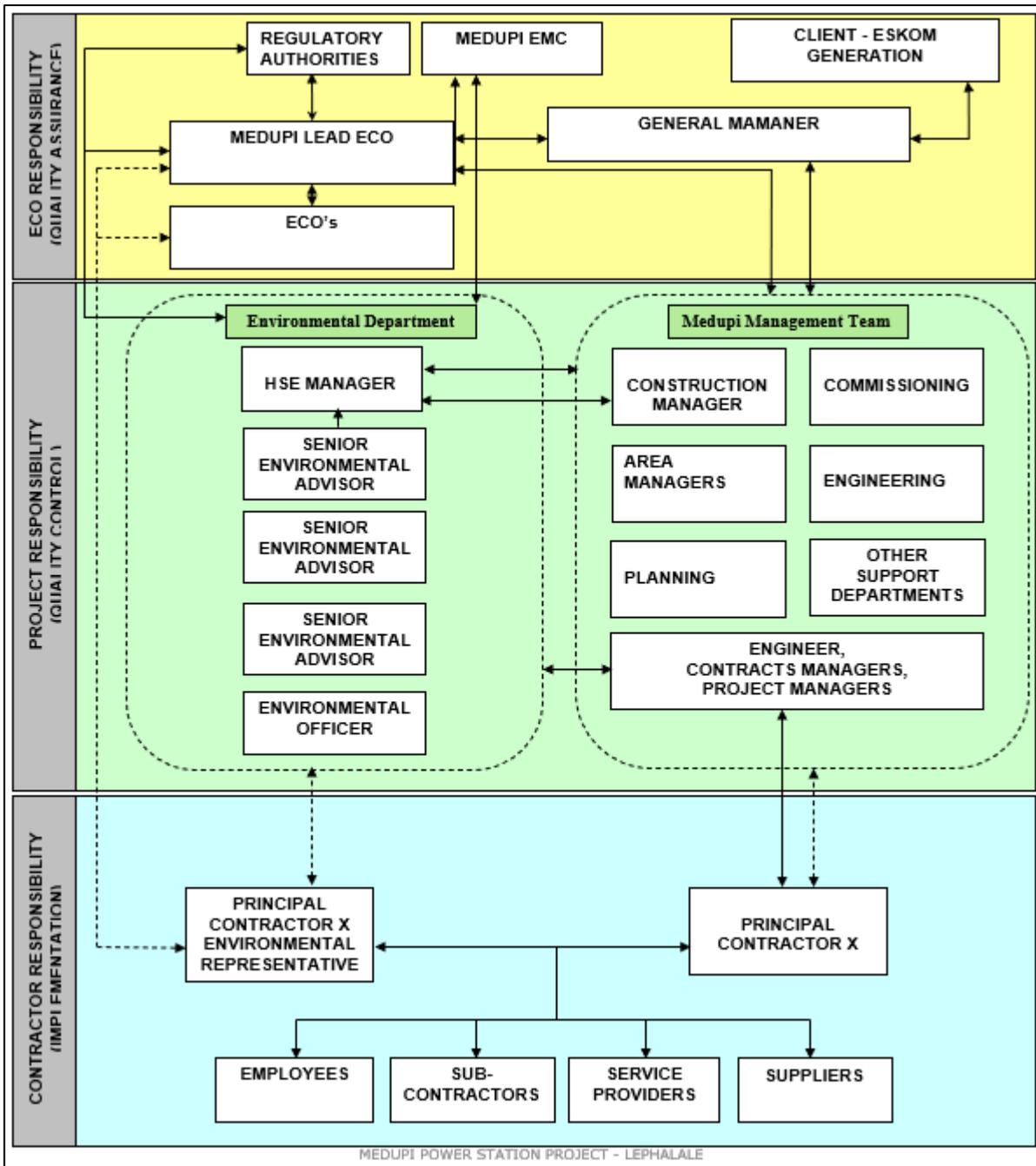
	<h2>MEDUPI POWER STATION PROJECT</h2>				Template Identifier	348-10040010	Rev	1
					Document Identifier	348-362543	Rev	0
					Effective Date	Jun-23		
					Next Review Date	Jun-28		
TITLE: ENVIRONMENTAL EXTERNAL COMMUNICATION REGISTER								
REF No	SPF NUMBER	NAME OF EXTERNAL PARTY/ AUTHORITY/RECIPIENT	DOCUMENT TITLE/DESCRIPTION	ISSUE DATE	DATE OF RESPONSE	STATUS/ COMMENT		
ENV20/LT094	348-1030899	DFFE - Intergrated Environmental Authorisations	Cover letter - Application for amendment of the construction environmental management plan rev 2, 2010 for the medupi power station project and associated infrastructure (ref no. 12/12/20/695) in lephalale local municipality		24-Sep-22			
ENV20/LT095	348-1030900	DFFE	Cover Letter: application for licence regarding protected trees for eskom medupi facilities within lephalale local municipality		26-Sep-22			
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Appendix C - TM Environmental Communication Overview



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