

# CentralEast Cluster: EMS/ISO14001:2015 Management Review

**Benito Williams**

February 2026



## Management Review

“Top Management shall review the organization’s Environmental Management System at planned intervals to ensure its continuing  
“suitability, adequacy & effectiveness ”

- Conclusions on the continuing suitability, adequacy and effectiveness of the EMS
- Decisions related to continual improvement opportunities
- Decisions related to any need for changes in the EMS, including resources
- Actions, if needed, when environmental objectives have not been met
- Opportunities to improve integration of the EMS with other business processes, if needed
- Any implications for the strategic direction of the CentralEast Cluster

## Content:

1. The status of actions from previous management reviews
2. Changes in external and internal issues that are relevant to the EMS
3. The needs and expectations of interested parties, including compliance obligations (Climate Change Consideration)
4. KZN/FS OU significant aspects
5. Risks and Opportunities
6. The extent to which environmental objectives have been achieved
7. Information on KZN/FS OU's Environmental Performance
8. NCRs and corrective actions
9. Monitoring and measurement of results - Climate Change Consideration 9.3(e)
10. Fulfilment of OUs compliance obligations
11. Auditing Results
12. Adequacy of Resources
13. Relevant communication from interested parties, including complaints
14. Opportunities for continual improvement

## **CentralEast Cluster Management Review: 15 /01/2025**

### **Action Items:**

- Adequacy of resources – 2 Resources were approved for KZN & FS (2 internal attempts at appointment and 3rd attempt to go external.
- No actions form previous review

## Internal

- Workload ratio versus resources not aligned to volumes of work.
- Constraints within the business in mitigation of oil spills / bird mitigation.
- Technological resources in the CEC e.g., Smart metering, EDA, MS Teams, Open Text, CCTV Cameras.
- Implementation of wildlife projects (KPI 1 & 2, proactive bird mitigation) in managing Wildlife Index Score (GCE's compact)
- Awareness of dept. aspects and impacts that impact on legal compliance.

## External

- Waste management requirements due to increase in legal requirements (BESS / PV / Microgrid / Small Scale Embedded Generator Projects (SSEG).
- Compliance due to stricter environmental regulations (incl. municipal bylaws)
- Turn around time in issuing of permits due to resource constraints in environmental authority departments
- Wildlife impacts and BESS / PV / Microgrid / Small Scale Embedded Generator Projects (SSEG) - Waste management, Public interest and social responsibility.
- Climate-related risks (e.g., extreme weather, regulatory changes) affect our organization's ability to achieve its environmental objectives.
- Operational Risks: Potential disruptions to supply chains and infrastructure due to climate-related events

- Demonstrate corporate responsibility and care for the environment (significant impacts) - Control impact to ecosystems and biodiversity
- Compliance is acknowledged as integral to maintaining our “license to operate” - Social License to Operate (SLO)
- Increased awareness and reports from NGO’s/landowners in terms of wildlife interaction incidents
- Improve EMS and legal compliance by capacity building for new managers, supervisors and contractors
- Public complaints on environmental issues from various platforms.
- Climate-related risks (e.g. extreme weather, regulatory changes) affect our organization’s ability to achieve its environmental objectives

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## Needs and expectations of interested parties

Transparency in environmental performance.	The government insists that Eskom must: Unbundle its operations to allow fair grid access and competition.
Access to environmental impact assessments.	Public Accountability & Legal Transparency- (Environmental Social Governance (ESG) issues)
Participation in public consultations.	Circular Economy
Alignment with Global Climate Goals, renewable energy transition (Support the shift to renewable energy).	Commitment to pollution prevention and biodiversity protection. Environmental and sustainability policies, strategies & improvement plans (e.g. Climate change strategy, AQ, Biodiversity, Waste management, Water management, etc.).
Compliance with environmental laws and international agreements ((Sustainable Developmental Goals 7,9,13 - SDG 7- Affordable & Clean and Modern Energy, 9 – Build resilient infrastructure promote inclusive & sustainable industrialization & Foster innovation] 13 –Climate Action – Take urgent action to combat climate change & it's impacts)	Business compliance to SHEQ Policy and implementation of ISO 14001:2015 compliant EMS.

- Encroachment of AC & M&O activities in protected areas (Wetlands / Nature Reserves / Heritage Sites/ Sensitive areas)
- Cutting of trees and plants - from powerline construction and servitude maintenance (Historical legal contraventions)
- Bird injuries or mortalities - from maintenance / operation of powerlines
- Air, land and water pollution - from damaged transformers, vandalism, waste disposal and construction/maintenance activities
- Damage to heritage resources (e.g., graves) – from construction activities
- Community/landowner concerns – from construction, operation and maintenance activities
- Soil disturbance/erosion - from construction, operation and maintenance activities



- Every **Activity** we do, is linked to an **Environmental Aspect** that causes an **Environmental Impact** & has associated **Risks & Opportunities**, e.g.

ACTIVITY	ASPECT	IMPACT	RISKS	OPPORTUNITIES
Servitude maintenance	Tree cutting	Loss of biodiversity	Legal contravention	Protection of biodiversity
Sewerage	Effluent disposal	Pollution of water/soil	Water/soil contamination	Increase in legal compliance
Transformer replacement	Oil leaks/drips	Pollution of water/soil	Clean-up costs	Protection of habitat
Servitude maintenance	Waste management	Land & air pollution	Legal contravention	Increase in legal compliance

- Note that in KZN and FS OU, some impacts are more significant (e.g., loss of trees, wetlands, climate change) than others (e.g., air pollution from driving)
- ISO14001 requires that each dept / CNC have a register of all their environmental aspects and impacts, relevant to their site, activities, products and services.



## 1. LEGAL CONTRAVENTIONS / POOR ENVIRONMENTAL PERFORMANCE

- Integrated Waste Management Plan not fully compliant with requirements.
- Inadequate monitoring and controls for vegetation management in AC and M&O environment.
- Increase in bird mortalities & proactive bird mitigation implementation measures.
  - Continued Wildlife Business Continuation Plan implementation by using Cluster resources to manage new incidents (investigation & reports).
- Level of environmental awareness and compliance by employees and contractors
- Emergency work (construction and maintenance) near wetlands
- Abnormal conditions related to vandalism (NEMA section 30 & NWA Section 20 incidents)
- Asbestos phase out plans – waste reporting of disposal certificates (SAP EHS).
- Reduced visibility of environmental resources within CentralEast Cluster due to workload ratio
- Wood pole treatment – Pest Control Operator compliance
- The Department of Forestry Fisheries and Environment (DFFE) issued new templates to be used when applying for tree cutting permits effective as of 01 April 2025 - The customer applications that will be mostly affected are those that require a tree cutting permit, and in KZN most of the applications received require a tree cutting permit.

## **2. REPUTATIONAL AND BIODIVERSITY LOSS RISK**

- Public outcry (Wildlife NGO's - VulPro) about negative environmental impacts, e.g., birds and wildlife killed on powerlines, veld fires
- Resource requirements (equipment / material) for implementation of Proactive Bird Mitigation Project and EWT incident recommendations

## **3. FINANCIAL RISK**

- Rehabilitation and/or clean up costs of oil spills
- Compensation costs due to claims resulting from deviation in power supply, veld fires, electrical contact, low hanging conductors
- Administrative fines and penalties due to legal non-compliance

- Environmental Index target setting align with CEC objectives.
- Reduced costs due to fewer or/no environmental incidents
- Environmental awareness improved due to training of employees.
- Use of virtual learning courses to reach employees and contractors
- EMS gap assessments for contractors in commercial evaluations
- More integration / communication with authorities to increase awareness (DEAC – R&S)
- Facilitate coordination of response and activities for climate change events.
- Development of plans for waste management of BESS / PV / Microgrid / Small Scale Embedded Generator Projects (SSEG) when end of life is reached – Dx Risk and sustainability.

Not Achieved

CENTRALEAST CUSTER (KZN/FS) SHEQS Environmental Objectives Effectiveness Tracker								
No.	Action	Measure	Tracking	Year End	Year End	Year End	Year End	YTD
				2021/22	2022/23	2023/24	2024/25	2025/26
KPI 1: Environmental Legal Compliance								
1	Legal Contraventions affecting the OHD	Number	Environmental Index	0	0	0	0	0
2	Legal contraventions	Number	Environmental Index	2	0	0	0	0
3	Percentage of compliance to Waste Procedure 32-245	Percentage	Environmental Index	86 / 87.52	97.34	93.38	97.55	97.26
4	Percentage compliance found during reviews and audits (licences/permits/legal reviews)	Percentage	Environmental Index	100 /95.75	96.73	97.47	95.55	96.19
KPI 2: EMS compliant to ISO14001 (2015)								
1	SAPEHS Data Integrity	Number	Audit report	2	1	1	TBD	Dec 2025
2	All ISO14001 (2015) audit findings closed	Number	SABS Close-out certificates	100	100	100	100	100
3	Wildlife Interactions composite score	Percentage	EWT Report	93.50	106.4	101.5	106.6	107.4
4	Environmental tender evaluations	Percentage	Tender Docs	100	100	100	100	85
5	Environmental Reviews	Number	EMS Reports	18	14	14	12	18
KPI 3: Enhance Environmental Culture								
1	Environment themed ZHD	Number	CAD Communiques	3	3	3	3	1
2	Environmental training as per Environmental Training Matrix	Number	Quarterly Reports/EAL	9	12	15	30	41

Site	Month	EMS Review score	Waste MGT Review
Nkandla CNC	April	100	97.92
PPM Empangeni	May	100	90.00
PPM Transformers	June	100	100
Major Engineering Works North	July	100	97.00
Jozini CNC	August	100	97.92
PPM Labelling New Germany	September	100	94
PPM Workshop Mkondeni	October	100	100
NED	November	95	100
Marina Beach CNC	December	----	100
LDE	December	97	----

Site	Month	EMS Review score	Waste Review score
Land Development & Environment	April	100	N/A
Jacobsdal CNC	April	---	99.27
Bothaville CNC	May	---	99.06
Bultfontein CNC	May	100	---
Ladybrand CNC	June	100	---
Dealesville CNC	June		100
PPM Welkom	July		92.59
Selosesha CNC	July	93	---
Parys CNC	August	100	100
Vaalpark CNC	September	97	98.79
PPM Vaalpark	October	100	100
NED	November	96	----
Bohlokong CNC		----	95
Jacobsdal CNC	December	95	---
Kroonstad CNC		---	92

- **CentralEast Cluster Head office Compliance Review 2025/2026 – The sites to be selected for audit for KZN and FS.**

- **The CentralEast Cluster scored:**

<b>2021/22</b>	<b>2022/23</b>	<b>2023/24</b>	<b>2024/25</b>	<b>2025/2026</b>
<b>94.45%</b>	<b>98.4%</b>	<b>100%</b>	<b>98.33</b>	<b>To be scheduled</b>

- **Engineering instructions to be communicated more frequently. Existing and new CNC personnel to be made aware of the implementation requirements of technical instructions.**
- **The EWT recommendation letter, must include which Eskom engineering instruction the recommendations must comply with. The Engineering instruction should state under which conditions a deviation from the specification is permissible.**

Date_reported	Report_Number	Province	Cluster	Locality	Rec. Date	KPI	Days
25-Aug-19	4539	KwaZulu-Natal	Central East	Matatiele	25-Aug-25	KPI2	134
25-May-27	4497	KwaZulu-Natal	Central East	Highmoor	25-Sept-23	KPI2	105

Incidents highlighted green <61 days for KPI1 and <241 days for KPI2

Incidents highlighted yellow 241-330 days for KPI2 and 61-90 days for KPI1

Incidents in Red font / highlighted red are overdue - For KPI1 >90 days open and KPI2 >330 days open

Scope of Audit	Auditor	Findings	Major/Minor	Certificate expiry date	Comments
<b>ISO 14001: EMS Cross-border</b>	Risk & Sustainability	1 Minor	Minor		Closed
ISO 14001 readiness for recertification	Free State	7 OFI			
<b>ISO 14001 EMS Audit</b>		1	Minor	25 April 2026 FS OU (EMS 0031)	Findings closed in October 2025.
Recertification Audit 1 <sup>st</sup> Surveillance	CertAfrica	8 OFI			
<b>ISO 14001: EMS Cross-border</b>	Risk & Sustainability				Internal Audit ISO 14001 – KZN Scheduled for <b>10 &amp; 11 November 2025</b>
ISO 14001 readiness for recertification	KZN				
<b>ISO 14001 EMS Audit</b>				30 September 2026 KZN OU (EMS 0032)	CertAfrica Audit ISO 14001 – KZN Scheduled for 9,10 December 2025
Recertification Audit 1 <sup>st</sup> Surveillance	CertAfrica				

- KZN / FS OU Environmental Performance presented monthly at:
  - SHEQS Meeting, Dx SHEQS Meeting, Zone, and Sector Meetings
  - 8 Environmental KPIs tracked monthly - reviewed at Dx annually
  - SAP data integrity on target score achieved few issues raised regarding compliance to the environmental incident management procedure (no findings for 2024/2025)
  - Reporting of the greenhouse gases to the Department of Forestry, Fisheries and the Environment.
- No. of days without an ELC tracked daily: No incidents for the past 4 years.
- DX Cluster days without Environmental Legal Contravention 1508 days as at end of August 2025.
- 2 KPIs tracked on the DPM:
  - No of environmental legal contraventions - 0 YTD
  - No of ELC affecting the FBS [Failure of Business Systems] - 0 YTD

## 3.3(c) – Environmental performance

- Climate change carries significant implications for entities like Eskom. Therefore, distribution businesses adhering to the Eskom Just Energy Transition must prioritize climate change adaptation and mitigation in all current and proposed infrastructure initiatives.
- Eskom must report their use of the greenhouse gases to the Department of Forestry, Fisheries and the Environment as a legal requirement (e.g., carbon tax, emissions reporting requirements).
- The Greenhouse Gas Protocol's (GHG Protocol) Corporate Accounting and Reporting Standard, the internationally recognised standard for calculating and reporting GHG emissions for corporate and public entities is used by Eskom.
- Calendar Year data is required for GHG emissions reporting.

### SCOPE 1

- Back – Up Generators (L)
- SF6 top – ups (Kg)
- Fleet vehicles (km)
- Waste Volumes

### SCOPE 2

- Purchased electricity from IPP's (distributed on Eskom infrastructure)

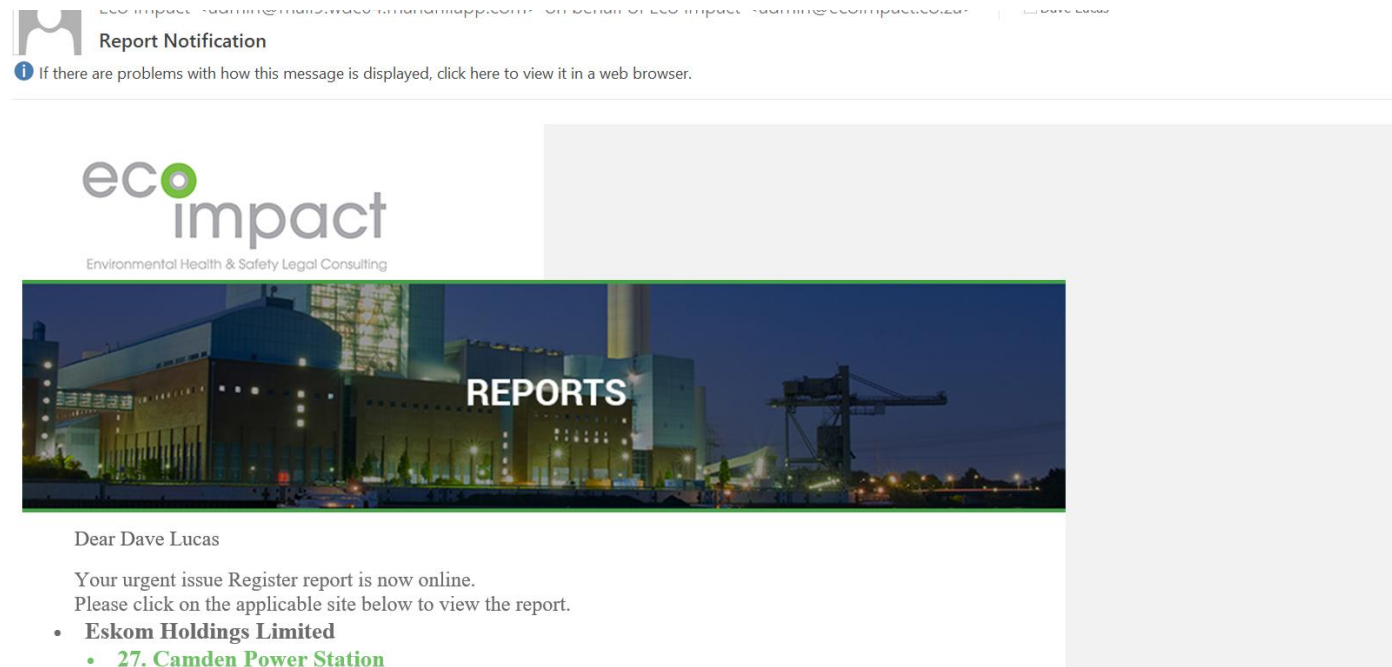
### SCOPE 3

- Air Travel
- Car Rental
- Employees (Km) claims
- Delivery to site (TBC)

## Promulgated Environmental Legislation - Fulfilment of Cluster's compliance obligations



- All are reminded to read and take the necessary action, based on your environmental management system, in terms of the updates provided through the SHE legal register – Eco Impacts Report Notification.
- Last one (Urgent Issue 03 – Register) issued on Oct 2024.



Month April 2025 to October 2025		Month November 2025 to March 2026	
April	 Adobe Acrobat Document	November	 Adobe Acrobat Document
May	 Adobe Acrobat Document	December	 Adobe Acrobat Document
June	 Adobe Acrobat Document	January	 Adobe Acrobat Document
July	 Adobe Acrobat Document	February	
August	 Adobe Acrobat Document	March	
September			
October	 Adobe Acrobat Document		

# obligations Tender evaluations

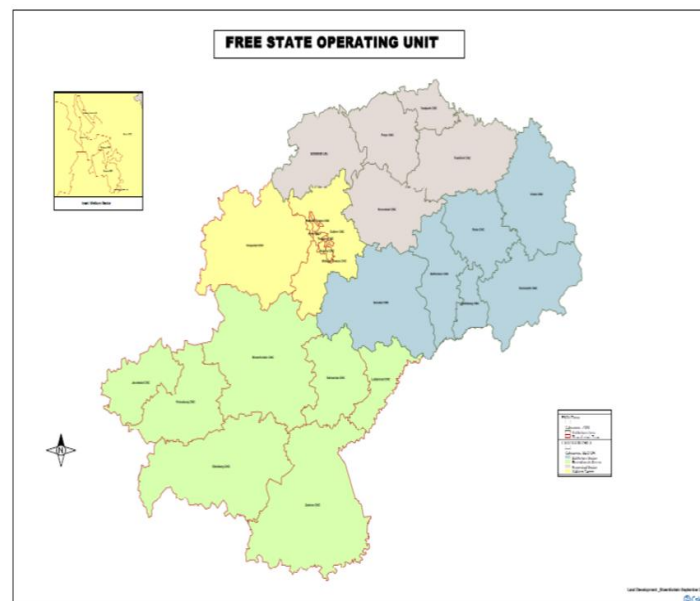
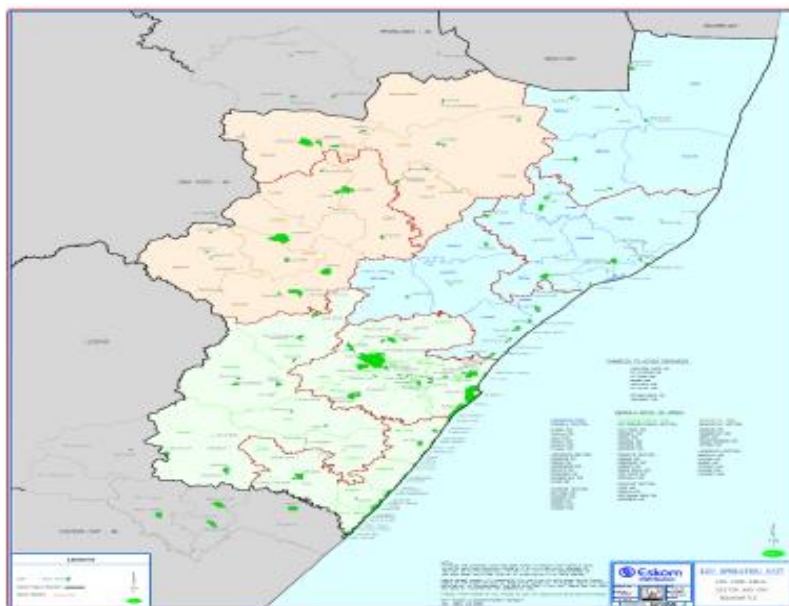
Tender Involvement	Tender Involvement
Mkondeni PV Phase 2 Project	Electrical Works
New Germany area office Solar PV Project – Phase 1	Capacitor Banks KZN171
ST Joseph's Solar Panel House Project	Heating, Ventilation and Air Conditioning (HVAC)
Enkovukeni Solar Panel House Project	Santiago and Hamilberg Farm Home Solar System Project
Pest Control contract	Wood Pole Replacement Live
Wood Pole inspection	Rouxville Bopela & Rouxville Smithfield Projects
Fibre Optic Installation	Smart Meter
Electrical maintenance Work	S1 LV Maintenance
Debt Collection for Central East Cluster	Direct Customer (DC) Minor
Provision of support services for Eskom Dx FSOU's PowerOn Advantage (ENMAC) SCADA/DMS System	Vegetation Management (FS/KZN)
Supply and delivery of Androids (EDA)	New Workshop 22/11kV Substation
MV/LV Training	Driedorp Boesmanskop 22kV line to Workshop Substation Koria 11kV line from Workshop Substation Welbedacht dam - Van Stadensrust 11kV capacitor bank

# Environmental Management: SHEQS

**Benito Williams**

**Environmental Manager**

**2 x Environmental Officer (KZN 1, FS 1)**



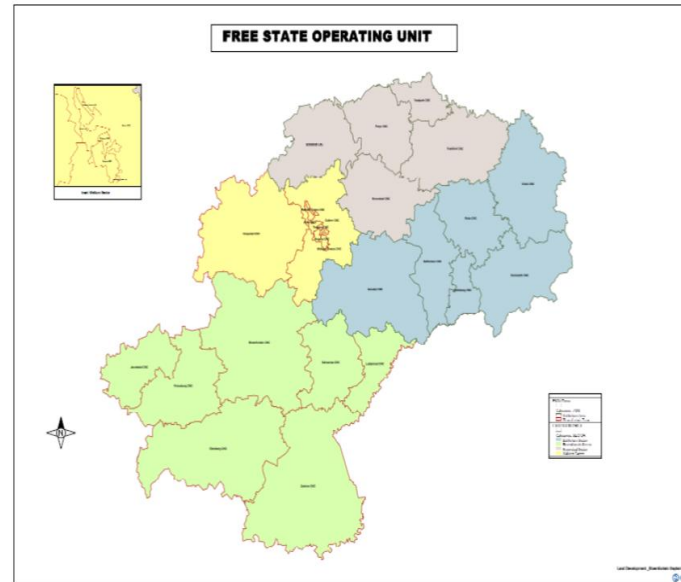
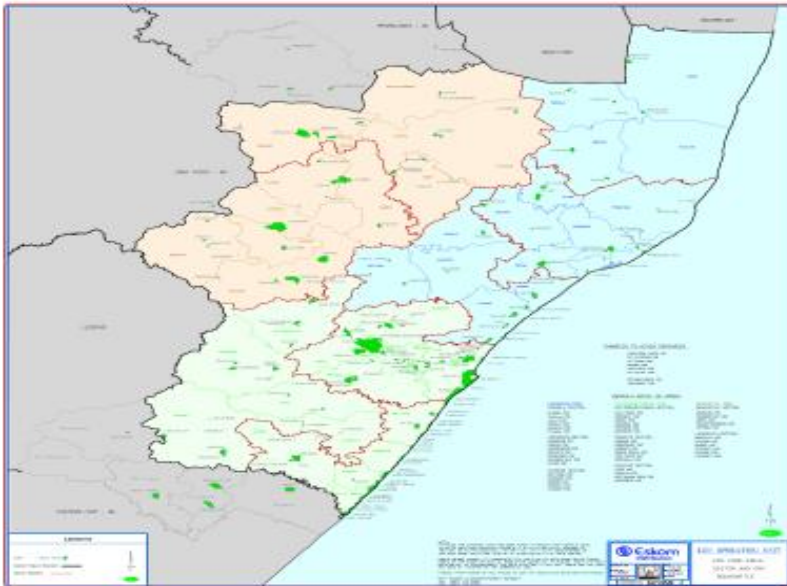
## WHAT SHEQS DO...

- EMS (ISO14001) development and implementation
- Waste Management Reviews
- Environmental Audits
- Wildlife Management
- Environmental Training and Awareness
- Incident management (Investigations and SAP, E, H &S)
- Environmental Performance Tracking and Reporting
- Environmental advice and guidance
- External environmental PR (national, prov and local govt, NGOs, educational institutions, etc.)
- Environmental scope for tenders and tender evaluation

# Environmental Management SHEOS

**Environmental Manager-**  
**Gerrie van Schalkwyk**  
**2 x Environmental Officers**

**1 Environmental Manager**  
**6 x Environmental Officers**



## WHAT LD DO...

- DESD (11, 22, 33kV)
- Basic Assessments (66, 88, 132kV)
- Environmental Authorisations
- Tree license applications
- Plant permit applications
- Water Use License applications
- AMAFA permit applications
- Management of Environmental Consultants, ECOs and Botanists
- DESD Reviews
- Tender evaluations

- . **9.3(b) – Changes in external and internal issues**
  - Climate-related risks (e.g. extreme weather, regulatory changes, Operational Risks: Potential disruptions to supply chains and infrastructure due to climate-related events.) affect our organization's ability to achieve its environmental objectives.
    - . Informed decision-making to avoid harm and legal liabilities.
    - . Achieving legal compliance through effective systems and monitoring.
    - . Reducing emissions to meet health and regulatory standards.
    - . Conserving water resources and minimizing liquid discharges.
    - . Improving waste management through reduction, reuse, and recycling.
    - . Protecting ecosystems through responsible land and biodiversity management.

## External

- Institute of Waste Management of Southern Africa (Waste Sites – updated sites and update of SAWIC website)
- Water Use Licence Application (WULA) Reporting Requirements from the Department of Water and Sanitation.
- FS Umbrella Fire Protection Association: The FS Provincial Wildfire Advisory Forum was established in conjunction with the PDMC to facilitate the development of unified Integrated Wildfire (veldfire) Management operational standards, structures, and practices in the province.
- Capacity-building workshop focused on the development of the Climate Change Needs and Response Assessment and the Response Implementation Plan for uMgungundlovu District Municipality.
- Collaboration with government, businesses, academia, and civil society to develop and implement climate adaptation strategies, leveraging diverse expertise and resources – workshop.
- Eskom/Free State Agriculture Quarterly Meeting: Maintain an ongoing working relationship between Eskom and organized agriculture in the Free State. Provide a structured platform for open dialogue on mutual challenges and expectations. Build trust and cooperative problem-solving between landowners and Eskom.

### **External:**

- Landowner/farmers, NGO's (VulPro): Increasing number of complaints about bird interaction incidents / wildlife / fire claims.
- Public raise environmental issues via environmental studies (Basic Assessment or EIA) for projects.
- Property damage claims or general environmental concerns via Contact Centre / Provincial Claims Committee.

### **Internal:**

- More visibility on projects for Environmental Management requirements implementation
- EMS awareness and implementation assistance for contractors (evaluation criteria)
- Environmental Law training for managers, supervisors and contractors
- Complaints from projects

- Use existing contractor forums to assist in improving their Environmental awareness and submissions for commercial.
- Waste reporting and compliance by using SAP EH&S system
- Proactive inclusion of compliance obligations at tender stage
- Implementation of Environmental Management Treatment Plans
- Implementation of Climate Change Adaptation plan and business phased requirements – change system design, situational awareness, energy system hardening, customer experience.
  - Improving emergency preparedness
  - Investing in climate-resilient infrastructure
  - Enhancing worker awareness and training
- Resource constraints, particularly in staffing and budget allocation, have impacted the timely implementation of certain environmental initiatives, including the rollout of training, implementation of the ISO 14001 system, climate change measures, environmental targets, compliance obligations, continual improvement efforts. **Management support is requested to address these gaps and ensure alignment with our ISO 14001 objectives.**

## Management comments and feedback



# Management Review Outcomes



Moving  
towards  
Excellence

- A. Opportunities for Improvement
- B. Possible changes that might affect the management system
- C. Resource needs
- D. Actions, if needed, when environmental objectives have not been met
- E. Opportunities to improve integration of the EMS with other business processes, if needed
- F. Any implications for the strategic direction of the CEC

**Facilitated By Brenda Cebekhulu**

