

	<p style="text-align: center;">Procedure</p>	<p style="text-align: center;">Medupi Power Station Project</p>
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Title: **Medupi Environmental Incident Management Procedure**

Document Identifier: **PPZ 200-10506**

Alternative Reference Number:

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Functional Area: **Environmental Management**

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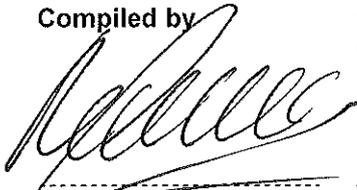
Current Change Note **CN100066**

Compiled by

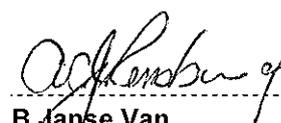
QA, Interface & Governance Review

Functional Responsibility

Authorized by

  
 E Marell  
 Environmental Manager

  
 B Mgidlana  
 Project Quality Manager

  
 B Janse Van Rensburg  
 Senior Construction Manager

  
 P Dukashe  
 Project Director

Date: 08/05/2018

Date: 08 MAY 2018

Date: 2018/05/08

Date: 08/05/2018

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## **1. Introduction**

The environmental legal and other requirements, to which Medupi Power Station Project Site must comply, provide the baseline criteria for sound environmental management practices.

## **2. Scope**

This process applies to all Environmental incidents that occur on the Medupi construction site and activities deemed to form part of such, under relevant Contractual arrangements. This Procedure shall be applied by Team Medupi and Contractors as applicable.

Principal Contractors shall undertake the following activities in support of this Procedure;

- Notification and Reporting of the Incident, through the WISPA HSE Incident Management module.
- Investigating the Incident, utilising own systems and processes of Investigation.
- Submit all Reports in line with NEMA Section 30 or NWA Section 20, if such an incident occurs;
- Submit Investigation Reports, through the WISPA HSE Incident Management module, in line with:
  - The Medupi Power Station, s.4 Employer Policy and Procedures – Part 9; Safety, Health and Environmental Requirements Schedule,
  - The Eskom Procedure for the Environmental, Occupational Health and Safety Incident Management, and
  - The Environmental Liaison Committee Performance Indicator Reporting Procedure.
- Record and undertake Corrective and Preventive Actions, as required to address the root cause of incidents.
- Deliberate and discuss Incidents and Lessons Learnt with their staff members and relevant HSE contractor meetings.

### **2.1.1 Purpose**

The purpose of this procedure is to:

- Define the Incident Management process so as to ensure compliance to applicable legislations, Client and international standard requirements.
- Provide for the effective and efficient Notification, Reporting, Investigation and close-out of Environmental Incidents.

### **2.1.2 Applicability**

This document shall apply throughout Medupi Power Station Construction activities, excluding activities handed over to the client, Generation.

### **2.1.3 Effective date**

The date of authorization shall be the effective date.

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## 2.2 Normative/Informative References

### 2.2.1 Normative

Document Title	Document Number
Project Execution Plan	200-5919
Project Quality Plan	200-1679
Development and Change of Medupi QMS Documents	200-5665
Document and Record Management Procedure	200-1680
Unit Construction Procedure Manual	200-163680
ISO 14001, Environmental Management Systems, Requirements with guidance for use	ISO 14001
National Environmental Management Act (107/1998)	External
Eskom Environmental, Occupational Health and Safety Incident Management	32-95
The Environmental Management Plan for the Medupi Coal-fired Power Station in the Lephalale Area, Limpopo Province – The Construction Phase	200-35208
Medupi Environmental Policy	200-73979
Environmental Liaison Committee Performance Indicator Reporting Procedure	32-249
Emergency Preparedness and Response Plan	200-9739
Environmental Incident Management Procedure	240-133087117
Procedure for the handling of HSE Non-conformities and Corrective and Preventive Action	200-38426
Eskom Spill Assessment Table	240-47176039
Environmental Communications Procedure	200-38432
Environmental incident Register	200-90900

### 2.2.2 Informative

- ISO 9001:2015
- ISO 14001:2014

## 2.3 Definitions

Term	Definition
Event	An event is any observable or extraordinary phenomenon or occurrence. An event could be the product of a chain of occurrence.
Environment	The Environment means the surroundings within which humans exist and that are made up of:

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	<ul style="list-style-type: none"> <li>a) The land, water and atmosphere of the earth;</li> <li>b) Micro-organisms and plant and animal life;</li> <li>c) The physical, chemical, aesthetic and cultural properties and conditions of the foregoing that influence human health and well-being.</li> </ul>
Environmental Event	Refers to all incidents that are not classified as an environmental legal contravention incident and/or an environmental legal contravention incident in terms of the OHD when the classification criteria are applied.
Low Environmental incident	Incident with little or no ecological/environmental effect/impact and no measurable impact on human health.
Minor environmental incident	Minor ecological effect Ecological damage can be remedied within six months. Minor hazard to humans in the immediate vicinity.
Moderate environmental incident	Incident could/does result in a moderate uncontained or sustained environmental release, impacting the local environment only. Ecological damage can be remedied in less than one year. Health hazard to humans in the immediate vicinity, but not resulting in critical or fatality/injury/illness.
Major Environmental Incident	Incident could/does result in a major uncontained or sustained environmental release, impacting the regional environment only. Ecological damage can be remedied within 1 year. Health hazard to humans in the immediate vicinity resulting in critical or fatal injury/illness.
Critical/Extreme Environmental incident	Incident has a recognised global environmental impact. Widespread or permanent local ecological damage. Remediation would take longer than one year. Could result in a major public health hazard. Magnitude is unknown.
Environmental legal contravention – incident:	An incident where a provision of environmental legislation (national, provincial, or local) and/or condition of an environmental approval (for example, environmental authorisation, water use license, waste licence, licence in terms of the National Forests Act) or any other legal document issued in terms of environmental legislation is contravened. (An environmental legal contravention incident is considered a breach in terms of compliance reporting).
Flash Report	It is a notification document informing the business of an incident that has occurred.
Environmental Incident	An unplanned event that could, or does result in an environmental impact.
Environmental legal contravention - incident in terms of the OHD:	These are specific cases of environmental legal contravention incidents that are considered to be of very high significance in terms of its environmental impact and/or Eskom in that they have a material business impact and illustrate a significant failure of business systems. Within the above principles they are identified in terms of the criteria below. If any one of the criteria specified in appendix C as well as the principle defined is relevant to a specific contravention of environmental legislation, then that environmental legal contravention incident is a potential "environmental legal contravention - incident in terms of the OHD".
Hydrocarbon spill	Refers to the release of liquid petroleum hydrocarbon (oil, diesel, jet fuel, etc.) spillage into the environment (includes soil and water) which could or does result in environmental damage, and/or pollution or degradation.
Wildlife	Refers to birds, wild-game, non-domesticated animals, marine and freshwater fish. Note: this definition is only applicable to the incident management procedure in order to enable practitioners to categorise biodiversity incidents into wildlife or vegetation types.
Incident	Any unplanned event, which could or does result in harm, damage and/or

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	environmental pollution or degradation.
Incident Classification	A process of determining whether the incident is an environmental legal contravention - incident, environmental legal contravention - incident in terms of the OHD or an environmental event.
Immediate action	Steps taken after the incident in order to contain or minimise further damage.
NEMA Section 30 Incident	Emergency Environmental incident, as described in section 30 of NEMA as follows: An unexpected, sudden and uncontrolled release of a hazardous substance, including from a major emission, fire or explosion, that causes, has caused or may cause significant harm to the environment, human life or property.
NWA Section 20 Incident	Includes any incident or accident in which a substance (a) pollutes or has the potential to pollute a water resource or (b) has or is likely to have a detrimental effect on the water resource.
Principal 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 OHSAct. <b>Classification:</b> A process of determining whether the incident is an environmental legal contravention - incident, environmental legal contravention - incident in terms of the OHD or an environmental event.
WISPA	A web based system that users can access from any workstation and mobile devices. This is accessed through assigned username and password and available at <a href="http://www.Medupiwispa.co.za">www.Medupiwispa.co.za</a>
Breach	Refers to the noncompliance with requirements of environmental legislation (including provincial legislation and District/Municipal bylaws), authorisations, permits and licenses. Note: The total number of breaches reported includes environmental legal contravention-incidents (as defined in this document) and administrative non-compliances (as established through reviews or audits etc.).

## 2.4 Abbreviations

Abbreviation or Acronym	Description
DEA	Department of Environmental Affairs
DWS	Department of Water and Sanitation
EMS	Environmental Management System
EOHSIM	Eskom Environmental, Occupational Health and Safety Incident Management (32-95)
EEIC	Eskom Environmental Incidental Committee
HSE	Health, Safety and Environment
ISO	International Standards Organisation
LEDET	Limpopo Economic Development, Environment and Tourism
NEMA	National Environmental Management Act (107 of 1998)
LLM	Lephalale Local Municipality
NWA	National Water Act
OHD	Operational Health Dashboard
PC	Principle Contractor
PCAR	Preventive and Corrective Action Report

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SAP	Systems, Applications, and Products in Data Processing
SAP EH&S	SAP Environmental Health and Safety (system)
TM	Team Medupi
WISPA	Web Integrated System of Processes and Applications

## 2.5 Roles and Responsibilities

### 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.

Table 1: RACI Matrix

Process Step/Activity	RACI Matrix							
	Project Director	Construction Manager	Unit Managers	Environmental Manager	Environmental Practitioners	Contract Managers	Contractor Env. Practitioners	ECO
Incident notification (Contractor Incidents)				I	C,I	I	R, A	I
Incident notification ( Team Medupi and ESKOM Incidents)	I	I	I	C, A	R	I		C; I
Incident Reporting via WISPA (Flash Report)	I	I	I	I	C,I, A, R	I	R, A	
Incident report (Flash Report) data integrity review				A	R	I	C,I	I
Incident Investigation (Contractor Incidents)				I	C	I	R, A	I

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Incident Investigation (TM Incidents)	I	I	I	A	R	C		C, I
Complete Section 30 (Notification of Emergency Incidents) document	I	I	I	I	C, A	I	R, A	I
Submit Section 30 (Notification of Emergency Incidents) to DEA	C, I	C, I	C, I	R, A	R	I	C	I
Report incidents on SAP EHS				A	R		C	
Review Incident reports	C	C	C, I	C, A	R			
Undertake Corrective Action (Contractor Incidents)		I	I	C, I	C, I		R, A	I
Undertake Corrective Action (Team Medupi Incidents)	A	I	I	R	C, I	I	I	
Close out of incidents and corrective actions	I	I	A	R	R	I	R, A	R

### 3. Procedure

#### 3.1 Incident Notification

- Handle an Incident in line with the Medupi Emergency Preparedness and Response Procedure.
- Notify the TM Environmental practitioner immediately after becoming aware of the incident occurrence.
- Provide the following information for this initial notification:
  - Time:
  - Place:
  - Brief description of what happened:
  - Immediate actions taken:
- Convey the above information in person, telephonically, via SMS, by email, or by radio, whichever is appropriate at the time.

#### 3.2 Incident Reporting

- Principle Contractors must complete a Flash Report via the WISPA system within 24hrs in which an incident occurred. Where a proxy is used, the Contractor is required to submit a manual flash report to the proxy before the end of shift in which an incident occurred.
- The TM Environmental Practitioner shall in case of any incident involving activities associated with Team Medupi complete a Flash Report via the WISPA system within 24hrs after which an incident occurred.
- The Flash Report on WISPA shall be completed by filling in all required fields.
- When submitting Flash Reports relating to spillages such shall be accompanied by a completed Spill Assessment Table (240-47176039) as attached.

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- The relevant TM environmental practitioner shall review information provided by the contractor on the Flash Report via the WISPA system. Where it is found that any data is incorrect or incomplete, such practitioner shall reject the Flash Report and provide reasons for such rejection. Once the relevant TM environmental practitioner is satisfied with information provided he/she shall accept the flash report.
- Once the Flash report has been accepted on WISPA, TM Environmental Department shall capture and record it on SAP EHS.

### **3.3 Incident Consequence and Priority Rating**

- Environmental incidents must be prioritised in order to determine the potential consequences and actions required to mitigate the incident timeously. The consequence of an incident must be checked against Appendix B and the incident prioritised using the allocated priority ratings within Appendix B
- Major Environmental incidents must be classified using the Eskom Classification ' Criteria for Environmental Incidents (Appendix C of EOHSIM) in order to determine if the incident is an environmental event, environmental legal contravention or environmental legal contravention in terms of the Operational Health Dashboard (OHD).
- Where an Environmental Incident is classified as NEMA Section 30 and/or NWA Section 20 the incident, it shall be reported by TM Environmental Department to all three spheres of government (DEA, DWS and LLM) within 24 hours of the occurrence of the incident.
- The WISPA system generates email notifications to relevant parties based on the Flash Report and in line with the level of severity of incident.

### **3.4 Incident Investigation**

- The Contractor or TM, shall undertake a formal Incident Investigation for all moderate, high and extreme environmental incidents. Where multiple parties are involved (either contractors or Generation), all parties will be invited to be represented on the investigation team and a combined investigation will be conducted. A basic assessment shall be carried out for low and minor incidents and an investigation may be required if there are multiple repeats of minor incidents or a minor incident could have resulted in a more serious consequence should other circumstances have prevailed; such instances will be determined on a case by case basis with a final decision being made by the Environmental Manager, Senior Construction Manager or Site Director. Incidents shall be classified into low, minor, moderate, major and extreme/critical incidents.
- Formal Incident Investigation shall be initiated within 7 (seven) working days of occurrence of the Incident and completed within 30 (thirty) working days.
- All areas of the WISPA Incident Investigation section shall be completed, including those relating to:
  - o Identification of Immediate, Root, and Contributory Causes;
  - o Corrective and Preventative Action and
  - o Lessons Learnt
- Where an incident is classified as NEMA Section 30 and/or NWA Section 20, the responsible Contractor shall compile and submit the NEMA Section 30 and/or NWA Section 20 report within 7 working days of occurrence to TM Environmental Department.
- TM Environmental Department shall review and submit the final signed NEMA Section 30 and/or NMW Section 20 incident report within 14 working days of occurrence to three spheres of government (DEA, LEDET, DWA and LLM).

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- Where an incident is classified as an Environmental Legal Contravention or an Environmental Legal Contravention in terms of OHD, the incident must be reported to the EEIC via divisional EEIC representative within the same month the incident occurred where reasonably practical.
- The EEIC representative shall be informed of the outcome of all Major Incident investigations to determine and verify the status i.e. Environmental Legal Contravention Incidents and Environmental Legal Contravention Incidents in terms of OHD.
- Records pertaining to the Incident and Investigation thereof shall be uploaded to WISPA and SAP, which shall act as the record repository.

#### **Note**

**No hardcopy or e-mailed records and documents pertaining to Incidents shall be viewed as formal or complete unless uploaded to WISPA.**

### **3.5 Incident Close-out**

#### **3.5.1 Contractors**

- For all major incidents the Contractor will be required to present the incident investigation to TM Environmental Department and relevant TM managers. The investigations should also be presented or discussed at the Contractors Environmental meetings and/or HSE Contractors meeting. This shall include Lessons Learnt arising from these incidents.
- The Contractor's Environmental Practitioner shall ensure that relevant Incidents and Lessons Learnt are discussed with all staff members and that records of such be kept.

#### **3.5.2 Team Medupi Environmental Department**

- TM Environmental Department may request that the investigation for minor incidents based on the frequency or severity, be presented at the Contractors Environmental and/or HSE Contractors Meetings. This shall include Lessons Learnt arising from these incidents.
- All Corrective Actions identified and agreed during the Incident Investigation process shall be followed-up by the relevant TM Environmental Practitioner.
- TM Environmental Manager or his representative shall ensure that the Environmental Performance Data (incidents trends) are discussed at the Contractors Environmental meetings and/or HSE Contractors meeting.
- Lessons Learnt and Incident Recall arising from major Incidents and/or repeat incident shall be communicated to all Contractors and relevant department within Eskom Group Capital. This shall be done as per the TM Environmental Communications Procedure 200-38432.
- As part of close-out process of Section 30 NEMA or Section 20 NWA incidents TM Environmental Department in consultation with the responsible contractor may be required to present the incident investigation to the relevant authority/ies.
- Close-out of environmental legal contravention and contravention incidents in terms of the OHD must have a closure certificate completed.
- Once the incident investigation has been completed on WISPA, such information shall be captured, records uploaded and closed-out on SAP EH&S by the TM Environmental Department.

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### 3.5.3 ECO

- Once the incident investigation is completed and approved by TM Environmental Department the ECO shall review and close-out the incident on WISPA.
- All Corrective Actions identified and agreed during the Incident Investigation process shall be followed-up by the ECO for assurance purposes.

#### Note

**The action of closing out an incident signifies that all measures have been effectively implemented, lesson learnt are effectively communicated and all relevant documents are attached.**

## 4. Records

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

- Flash Reports,
- Incident Investigation reports and records,
- NEMA Section 30 Emergency Reports,
- NWA Section 20 Reports, and
- Minutes of Contractors HSE meetings.

The revision status of Medupi project Quality Record templates is defined in the Medupi QMS Index LRD 200 – 47329 maintained by Medupi Quality Dept.

Retention and storage of records generated as a result of this document shall follow the process defined in the PPZ 200 1680 "Document and Record Management Procedure

## 5. Process for Monitoring

### 5.1 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 QMS measurement, analysis and improvement initiative.

**Table 2: KPA's/KPI's**

Key Performance Area	Key Performance Indicator	Measure Frequency	Responsibility	Records
All Incidents reported to the TM and reported timeously	All Incidents reported within 24hours of occurrence	Every incident	Environmental Practitioners (TM/PC)	Communication records
	All Incident Flash Reports submitted before within 24hours	Every incident	Environmental Practitioners	Flash reports

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	of occurrence		(TM/PC)	
	All incidents reported using WISPA Incident Management module.	Every incident	Environmental Practitioners (TM/PC)	Reports captured on WISPA
Incident data integrity	All incidents reported using WISPA Incident Management module, enabling review prior to acceptance	Every incident	Environmental Practitioners (TM/PC)	Manager approval on WISPA
Prevention of recurrence	Lessons Learnt communicated to all Contractors	Legal Contraventions, Major Events, NEMA Section 30, NWA Section 20	Environmental Practitioners (TM/PC)	Communication records
	Lessons Learnt communicated by all Contractors to staff and subcontractors	Legal Contraventions, Major Events, Section 30	Contractor EO	Communication Records
	Corrective Action undertaken within stipulated timeframe and effectively so.	Every incident	Environmental Practitioners (TM/PC)	PCARs closed with evidence
	Investigations effectively identify Root, Contributory and Direct Causes in all cases	Every incident	Environmental Practitioners (TM/PC)	PCARs closed with evidence
Investigation reports closed-out timeously	Investigations undertaken and/or lead by competent Incident Investigators	As per audit schedule	Environmental Practitioners (MPT/PC)	Investigation Reports
	Investigations presentations undertaken	Major event and Legal Contravention	Environmental Practitioners (TM/PC)	Incident register
Statutory Incident reporting occurring within stipulated timeframe and in correct format	Where an Environmental Incident is classified as a "NEMA Section 30", the incident should also be reported to all three spheres of government (DEA, DWA, LEDET and LLM) within 24 hours of the occurrence of the incident	All applicable incidents	Environmental Manager	Initial notification
Statutory Incident reporting occurring within stipulated	Section 30 documents submitted to TM Environmental Manager within 7 (seven) working days of occurrence	All applicable incidents	Environmental Manager	Section 30 Report

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timeframe and in correct format				
Statutory Incident reporting occurring within stipulated timeframe and in correct format	Section 30 documents submitted to all three spheres of government (DEA, DWA, LEDET and LLM) within 14 working days of occurrence.	All applicable incidents	Environmental Manager	Section 30 Report
Document control	Retain and store records generated as a result of this document as defined in the PPZ 200 1680 "Document and Record Management Procedure"	Annually or as required	EMS Co-ordinator	As generated by the procedure
Revision of Document	Revision requirements in line with Medupi Procedures PPZ 200 5665 "Development and Change of Medupi QMS Documents" and PPZ 200 1680 "Document and Record Management Procedure"	Annually or as required	Environmental Manager	New revised document

**5.2 Document Review and Self-Assessment**

**5.2.1 Document Self-Assessment**

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

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

Participants and results of the "self-check" review shall be documented by the Process Owner in the "Self-Assessment Checklist" (*QMS Template No. QMS PTZ 200 - 75592*) included as an Appendix to this procedure which shall be issued to [medupiq@eskom.co.za](mailto:medupiq@eskom.co.za) by the Process Owner once completed.

Process Owner shall proceed with any revision requirements in line with Medupi Procedures

PPZ 200 5665 "Development and Change of Medupi QMS Documents" and PPZ 200 1680 "Document and Record Management"

**5.2.2 Revision Period**

Three yearly.

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### 5.3 Training Requirements

The following training interventions are required to enable successful implementation of this process:

- WISPA Incident Management module, and
- Incident Investigation.

## 6. Acceptance

This document has been seen and accepted by:

Name	Designation
Emile Marell	Environmental Manager
B Mgidlana	Project Quality Manager
B Janse Van Rensburg	Senior Construction Manager
P Dukashe	Project Director

## 7. Revisions

Date	Rev.	Compiler	Remarks
2018/01/28	07	M Boshomane	Annual Review including new ISO 14001:2015 requirements, alignment to alignment to the new Eskom Environmental Incident Management Procedure 240-133087117 and audit findings
2015/10/29	06	L Ramono	Annual Review, aligning procedure to Eskom 32-95
2014/08/04	05	N Nengovhela	Annual Review

## 8. Development Team

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

- M Boshomane
- M Sebonego

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**Appendix A - Process Self-Assessment Checklist**

Discipline:		Applicable Document No.: PPZ 200-10506		Self Assessment Date: / /	
Item No	Ref Section	Self-Assessment Question	Compliant		Comment
			Yes	No	
1	5.2.1	Is an Incident handled in line with the Medupi Emergency Preparedness and Response Procedure?			
2	5.2.1	Is the Environmental Practitioner notified within (24) hours of the occurrence of an incident?			
3	5.2.1	Is the following information provided for this initial notification:			
3.1	5.2.1	• Time			
3.2	5.2.1	• Place			
3.3	5.2.1	• Brief description of what happened			
3.4	5.2.1	• Immediate actions taken			
4	5.2.1	Are the above information conveyed in person, telephonically, by email, or by radio, whichever is appropriate at the time?			
5	5.2.2	Do Principle Contractors complete a Flash Report via the WISPA system by end of shift of an incident having occurred?			
6	5.2.2	Does the Flash Report contain:			
6.1	5.2.2	• A brief description of the incident describing what occurred			
6.2	5.2.2	• Actions taken to make the situation stable			

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7	5.2.2	Does the Environmental Practitioner complete a Flash Report via the WISPA system by end of shift of incident occurring, where such incident involves members of the TM?				
8	5.2.2	Does the WISPA system generate notifications based on Flash Report and in line with the level of severity of Incident?				
9	5.2.2	Does the Environmental Practitioner review information provided on the Flash Report via the WISPA system and where found that any data is incorrect or incomplete, does such Practitioner reject the Flash Report and provide reasons for such rejection?				
11	5.2.2	Do all Environmental Flash Reports submitted have Oil Spill Assessments attached, as applicable?				
12	5.2.2	Does the Chairman of the TM Contractors HSE meeting ensure that reported Incidents are discussed at the monthly meeting of such meeting?				
13	5.2.3	Does the Contractor, or TM, undertake a formal Incident Investigation of all moderate, high and extreme incidents ?				
14	5.2.3	Are such formal investigation data loaded on WISPA in the Investigation-area of the respective Incident?				
15	5.2.3	Are the formal Incident Investigation undertaken by a person appointed to such a function, and who is in possession of suitable Incident Investigator training and competence?				
16	5.2.3	Are formal Incident Investigation initiated within 7 (seven) working days of occurrence of the Incident and completed within 30 working days?				
17	5.2.3	Are all the areas of the WISPA Incident Investigation section completed, including those relating to:				
17.1	5.2.3	<ul style="list-style-type: none"> <li>• Identification of Immediate, Root, and Contributory Causes</li> </ul>				
17.2	5.2.3	<ul style="list-style-type: none"> <li>• Lessons Learnt</li> </ul>				

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17.3	5.2.3	<ul style="list-style-type: none"> <li>Corrective Action</li> </ul>			
18	5.2.3	Where an Environmental Incident is classified as a "NEMA Section 30", is a Section 30 report completed within 7 (seven) Working days of occurrence and submitted to the TM Environmental Manager for verification?			
19	5.2.3	Does the TM Environmental Manager submit such a Section 30 report to the DEA within 14 working days of occurrence?			
20	5.2.3	Are records pertaining to the Incident and Investigation thereof uploaded to WISPA, which shall act as the record repository?			
21	5.2.4	Is the Contractor or Functional Manager presenting the incident investigation (for all Legal Contravention, Major Environmental Event) to the TM Management Team within 21 Working days or occurrence to ensure close-out?			
22	5.2.4	Are all the identified and agreed Corrective Actions as per the Incident Investigation process followed-up by the relevant TM Environmental Practitioner?			
23	5.2.4	Is this in line with the requirements of TM Procedure for the Handling of Non-conformities and Corrective and Preventive Action?			
24	5.2.4	Are the results of such incident investigations discussed at Contractors HSE Meeting?			
25	5.2.4	Does this include Lessons Learnt arising from Contractor incidents?			
26	5.2.4	Are all lessons Learnt and Incident Recall arising from serious Incidents, or Incident trends, communicated to all Contractors and relevant department within Eskom Group Capital via the MPT Environmental Communications Procedure?			
27	5.2.4	Does each Contractor ensure that relevant Incidents and Lessons Learnt are discussed with all staff members and record of such be kept			

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**Medupi Environmental Incident Management Procedure**

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Comments:			
Self-Assessment by:	Name:	Position:	Revision Required? (Yes / No)
Attendees:			Planned Revision Date:

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**APPENDIX B- Consequences and Priority Rating**

Consequence Categories	Low/minimum	Minor	Moderate	Major	Critical
<b>Consequences</b>	Little or no ecological effect and no measurable impact on human health.	Minor ecological effect. Ecological damage can be remedied within six months. Minor hazard to humans in the immediate vicinity.	Incident could/does result in a moderate uncontained or sustained environmental release, impacting the local environment only. Ecological damage can be remedied in less than one year. Health hazard to humans in the immediate vicinity, but not resulting in critical or fatal injury/illness.	Incident could/does result in a major uncontained or sustained environmental release, impacting the regional environment only.  Ecological damage can be remedied within 1 year. Health hazard to humans in the immediate vicinity resulting in critical or fatal injury/illness.	Incident has a recognised global environmental impact. Widespread or permanent local ecological damage. Remediation would take longer than one year. Could result in a major public health hazard. Magnitude is unknown.
<b>Environmental Priority Rating</b>	Low	Moderate		High	Extreme

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## APPENDIX C – Classification Criteria for Environmental Incidents

### Appendix C: <sup>2</sup>Classification Criteria for Environmental Incidents

EICC criteria for classification of environmental incidents			
Element	N/a	Yes	No
1. Did the incident result in a contravention of any environmental legislation and/or condition of a license, authorisation or permit?			
2. Environmental duty of care (Section 28 of NEMA) - Did the incident result in either sterilising the soil or destroying rare, endangered, or protected fauna or flora?			
3. Environmental duty of care and prevention of pollution (Section 28 of NEMA and Section 19 of NWA) - Did the incident result in making any water resource unfit for its original purpose such as domestic, agricultural, or industrial use or reduce the water quality to such a state that human intervention is required to restore it to its original quality?			
4. Environmental duty of care and prevention of pollution (Section 28 of NEMA and Section 19 of NWA) - Did Eskom fail to take reasonable measures to prevent pollution or degradation from occurring?			
5. Environmental duty of care and prevention of pollution (Section 28 of NEMA and Section 19 of NWA) - Did Eskom fail to prevent pollution or degradation from continuing?			
6. Environmental duty of care and prevention of pollution (Section 28 of NEMA and Section 19 of NWA) - Did Eskom fail to implement measures to prevent pollution or degradation from recurring?			
Specify legislation, applicable section within legislation, and license condition that were contravened.			
Classification If "Yes" to any of the questions, classify incident as legal contravention, if "No" to all of the questions, classify as an event.			

**If classified as a legal contravention, check against the following criteria to determine whether the incident is an OHD.**

Criteria	Yes	No
1. The environmental legal contravention - incident results in formal censure from government. These are a compliance notice, a directive, a fine (including a NEMA section 24g application), prosecution.		
2. The environmental legal contravention - incident is not reported through the initial notification to the applicable department as per this procedure (240-133087117).		
3. The environmental legal contravention - incident is considered a repeat environmental legal contravention (using the process flow found in Appendix A of this document). Note: This criterion can only apply if the previous incident was classified as an environmental legal contravention.		
4. The corrective action(s) for the legal contravention- incident is not implemented within 30 days after the due date as per this procedure (240-133087117).		
OHD event (any shaded area marked)		

<sup>2</sup> The above criteria are applied in conjunction with the definitions for LCs and OHDs, taking into account the associated principles.

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**APPENDIX D-Spill Assessment Table**

<b>Spill Assessment Table</b>		Template Identifier:	240-44047082	
		Template Revision:	0	
		Document	240-47176039	
		Document	2	
		Authorisation Date:	01/07/2013	
Revision Date:	Jul-15			
All spills need to be assessed by completing the assessment table and answering the questions in Annex B below. Using your judgement based on the facts available, allocate the relevant points (0, 1, 3 or 5) to each of the following and add them together. The cumulative score will dictate the appropriate corrective action.				
Condition	0	1	3	5
Source of the spill	Minor drip	Weep	Drip/leak	Explosion/incident
Age of spill	Immediate Spill	Happened within last 24 hours	Happened recently - spill still moist (within the last week)	Historic (consequences/impact unknown)
Relevant response	Notification adequate and timeous according to 32-95 Incident procedure	Notification but action not adequate to prevent further damage	Notification but no further action	Incident procedure (32-95) not followed
Threat to any water body	None – in bund area	Low threat (although not in bund area)	Threat with rain	Access to waterway
Containment	Within bund area or containment tank	Leak is minor - can be controlled, contained and plugged with a spill kit	Leak is moderate - cannot be successfully managed with spill kit.	Leak is serious, containment is impossible
Life threatening Conditions	None at all	Minor (potentially an environmental and health risk if not treated)	Moderate (environmental or health risk only)	Serious (explosion, fire, health and a major environmental)
Weather conditions	Will not be negatively affected by weather conditions	Good weather and will last until spill is cleared	Moderate, but may change suddenly to weather conditions which will hamper containment	Raining
Properties affected	In bund area	On Eskom property Inside Eskom security fence	On Eskom property but outside security fence	Off-site (Eskom's neighbouring properties and public roads) *25 points
Public relations threat	None	Small (no reputational damage envisaged)	Medium (reputational damage local)	Large (reputational damage national)
Surface types	Bund area/concrete or cement /impermeable surface	Clay or compacted ground	Loose or loam soil	Sandy soil and gravel
Traffic implications	Not on any road	Within Eskom boundaries	Public road/part of the road will just be cordoned off	Public road that will need to be closed
PCB presence*	None	Less than 20 ppm in the oil	Less than 50 ppm in the oil	Over 50 ppm in the oil will automatically get *25 points
Total score	Sub total	Sub total	Sub total	Sub total
Rating	Insignificant spill ≤ 5 POINTS	Minor spill 5 - 12 points	Moderate spill 13 – 24 points	Major spill ≥ 25 points
Mitigation Action	Clean-up to be performed, incident recorded in site register and reported to Environmental Co-ordinator. Informed Recorded as 'For Noting'.	Clean-up must be performed, site register updated and a report issued to the relevant Environmental co-ordinator, classified as an event	Contain, and call in the assistance of the Environmental co-ordinator, possibly a legal contravention	Contain, call on Environmental co-ordinator who will assess the situation and if needed call upon an emergency response team, possibly a legal contravention
*If the PCB levels of the oil are not known through prior testing, the spill shall be treated as a PCB spill, until such time that analysis proves otherwise.				

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