 Eskom	Procedure	Medupi Power Station Project
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Title: **Medupi Environmental Aspects and Impacts Procedure**

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

Functional Area: **Environmental Management**





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Compiled by	QA, Interface & Governance Review	Functional Responsibility	Authorized by
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Date: 2021/09/28	Date: 2021/09/27	Date: 28/09/2021	Date: 2021/09/30

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## **1. Introduction**

Environmental aspects and impacts of the activities, products and services at Medupi Power Station Project need to be identified and assessed (in terms of significance) to enable the implementation of sound environmental management practices.

## **2. Scope**

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

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

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

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

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

### **2.1.1 Purpose**

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

This shall ensure that the appropriate methodology is adopted:

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

### **2.1.2 Applicability**

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

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### 2.1.3 Effective date

Authorization date will be the effective date.

## 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 Management Procedure	200-1680
Unit Construction Procedure Manual	200-163680
ISO 14001, Environmental Management Systems, Requirements with guidance for use	ISO 14001
The Constitution of the Republic of South Africa	Act 108 of 1996
The National Environmental Management Act	Act 107 of 1998
The RSA Occupational Health and Safety Act (Act 85 of 1993), and related regulations	External
Unit Construction Procedure Manual	200-163680
Medupi Environmental Management Policy	200-73797
Medupi EMS Scope and Manual	200-73971
Record of Decision for the Medupi Project	12/12/20/695
Record of Decision for Excess Coal Stockyard	14/12/16/3/3/1/531
Medupi Power Station Ash Dump Licence	12/9/11/L50/6
Record of Decision for Raw Water Pipeline	12/12/20/2069
[16] Register of EMS Procedures, Operational Controls and Records Master List	200-74168

### 2.2.2 Informative references

- ISO 9001:2015
- ISO 14001:2015
- ISO 18001:2007

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## **2.3 Definitions**

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

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Legal liability	Potential legislative action taken against the Medupi Power Station Project or Eskom as a result of the environmental impact of the Station's activities, products or services
Normal condition	Any routine, planned construction or associated activities
Operational Control	Means and methods employed by the TM to manage identified significant Aspects and avoid or minimize Impacts. May also be referred to as Mitigating Actions or Risk Control Measures
Operational interference	When an environmental impact affects the normal or optimal activities at the Medupi Power Station Project construction site
Probability	The possibility of an environmental impact occurring.
Receiving environment	The immediate natural surroundings which are affected (impacted) by an activity or environmental incident.
Reputational risk	Any reaction from interested and affected parties that affects Medupi Power Station Project's ability to maintain sound relations with stakeholders.
Severity	The magnitude of the effect on the environment should an environmental impact be realised.
Toxicity	The degree to which a substance or activity is harmful to the environment.
Life cycle	Consecutive and interlinked stages of a product(or service) system, from raw material acquisition or generation from natural resources to final disposal.
Legal database	An online platform where the collection of all national, provincial and local legislation applicable to the project are stored.

## 2.4 Abbreviations

Abbreviation or Acronym	Description
A&I	Aspects and Impacts
EA	Environmental Authorisations
EMP/r	Environmental Management Plan/Program
ECO	Environmental Control Officer
EMS	Environmental Management System
HSE	Health, Safety and Environment
ISO	International Standards Organisation

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TM	Team Medupi
OHSAct	Occupational Health and Safety Act, No. 85 of 1993
RoD	Record of Decision

## 2.5 Roles and Responsibilities

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

### RACI Matrix Key:

R Responsible	-	The role-player required to complete the activity/task
A Accountable	-	The role-player accountable for the activity/task and who is required to ensure that the activity is completed on time and in a manner which meets all expectations/requirements
C - Consult		The role-player with whom the Responsible role-player is required to consult before the activity
I - Information		The role-player whom the Responsible role-player is required to inform once the activity/task has been completed

**Table 1: RACI Matrix**

	RACI Matrix						
Process Step/Activity	Project Director	Construction Manager	Unit Managers	Environmental Manager	Environmental Practitioner	TM Staff	Contractors
Identify Aspects	I,A	C,I	R,C,I	R,A,C,I	R,C,I	C,I	R,C,I
Determine Impacts	I	C,I	R,C,I	R,A,C,I	R,C,I	C,I	R,C,I
Assessment of Impacts	I	C,I	R,C,I	R,A,C,I	R,C,I	C,I	R,C,I
Control and Assessment	I	C,I	R,C,I	R,A,C,I	R,C,I	C,I	R,C,I
Development of Operational Controls	I,A	C, I	C,I	R,A,C, I	R,	C,I	R,C,I

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### **2.5.1 Contractor Responsibilities**

Contractors shall undertake the following activities in line with requirements of the Employer Policies and Procedures, all approved Medupi EAs/RoDs, EMPs, and applicable Legal and Other Requirements;

- The compilation and maintenance of an Environmental Aspects and Impacts Register, particular to their Scopes of Work;
- Bring identified significant Environmental Aspects and Impacts to the attention of the TM, Environmental Department and in turn ensure they keep and understand the project-wide Environmental Aspects and Impacts;
- Comply with project-wide Operational Controls determined and developed from the Medupi Environmental Aspect and Impact Register; and
- Review their A&I Register:
  - changes in their Scope of Works;
  - new processes, procedures or technologies are implemented;
  - changes in the project-wide A&I Register; and/or
  - changes in applicable legislation.

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## **2.6 Related/Supporting Documents**

N/A

## **3. Process Description**

### **3.1 Identification of Environmental Aspects and Impacts**

- The responsible environmental practitioner from each Unit is to identify the Unit's activities, products and services with input from contractor's A&I registers and capture this information as per the Identification of Aspects and Impacts Form (Attachment A).
- For each responsible Unit , the environmental aspects are identified based on:
  - a description of the activities that take place in the area;
  - the known impacts of the activities; and
  - any changes in the Unit's activities, products or services.
- When determining the environmental aspects and associated impacts, the following must be taken into account:
  - potential and actual impacts;
  - positive and negative impacts;
  - direct and indirect impacts (the use of a resource such as electricity indirectly uses water and fuels which are examples of indirect impacts);
  - inputs and outputs associated with current, past and planned activities, products and services;
  - normal, abnormal and reasonable foreseeable emergency situations;
  - life cycle approach is used and improved on an ongoing basis;
  - Legal database reference;
  - potential secondary and cumulative impacts; and
  - the extent to which Medupi Power Station Project has control or influence over its activities, products and services.

### **3.2 Rating of Environmental Aspects and Impacts**

- The Unit specific activities, products and services are rated in terms of sustainable development (i.e. considering the environmental, social/human and business/economic implications) using the Quantification of Aspects and Impacts Significance Rating as outlined in document 200-74195) and values are assigned to each negative impact according to the following criteria:
  - Probability;
  - Severity;
  - Frequency;

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- Receiving environment;
  - Toxicity;
  - Legislation contravention;
  - Legal liability;
  - Operational interference; and
  - Reputational risk
- When rating negative impacts, the situation is assessed by taking the worst case scenario into account.
- Positive impacts are not rated for significance, although effort should be made to maintain or increase the good effect of the positive impact.
- An impact's score for each criterion, as per the Quantification of Aspects and Impacts Significance Rating (Attachment B), is added up to determine the significance rating.
- Significant aspects and impacts are determined as those with a risk rating score of half of the highest rated score and above.
- Therefore, impacts with Project-wide significance are those impacts with a risk rating score of half of the highest rated score and above, when considering the whole Project's impacts.
- All impacts with Project-wide significance must be actioned / addressed in the Medupi Power Station Project's Construction EMPr to control, or where possible, reduce or eliminate the impact.
- Similarly, impacts with Unit specific significance are those impacts with a risk rating score of half of that particular Unit's highest score and above. Thus not all impacts with Unit specific significance are reflected in the Project's EMPr, although a Unit responsible person may utilise a Unit specific EMPr to manage environmental aspects within the Unit.
- Re-rating of the aspects will be conducted after controls have been instituted; the Re-rating shall consider the effectiveness of the controls e.g. monitoring programs, audit report etc. The Re-rating must take into account the fact that some controls might not be correctly or effectively implemented and hence might give an indication that the controls are not working. In cases where the instituted controls do not reduce the risk ratings, new controls must be considered.

### **3.3 The Environmental Aspects and Impacts Register and EMPr**

- The Identification of Aspects and Impacts (containing information as in Attachment A) and the Quantification of Aspects and Impacts Significance Rating using Attachment B, form the basis of the Medupi Power Station Project's Aspect and Impact Register. An electronic version of the combination of these forms is available under the file 'Aspect and Impacts Register' on TM's electronic Hyperwave system.
- Station significant impacts are highlighted in red on the electronic version of Environmental Aspect and Impacts Register.
- The Environmental Aspect and Impacts Register must be reviewed as stipulated under Section 6.1.4 of this document. Once reviewed, older versions must be archived. Once a new revision of the Environmental Aspect and Impacts Register is finalised, it is placed on the electronic Hyperwave system as the 'Medupi Project Environmental Aspect and Impacts Register'.

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- Aspects and impacts which have had a change in significance rating during the review process must be listed in the Re-quantification column of the Aspects and Impacts Register.
- The current Environmental Aspect and Impacts Register on the Electronic system will show where significant impacts are linked to Medupi Power Station Project's EMP and/or operational documentation.
- The EMPr must, at a minimum, contain:
  - environmental objectives;
  - reference to significant aspects;
  - area of activity;
  - quantitative or qualitative targets;
  - specific actions addressing aspects and impacts;
  - target dates for completion of actions;
  - resources required (including responsible person/s; financial allocations; equipment; natural resource requirements); and
  - progress on actions addressed.
- Unit specific EMPs, may be developed and maintained by the Unit's Environmental Representative to enable sound management of the Unit's specific aspects and impacts.
- The significant aspects and associated impacts will be shared with all TM personnel and Principal Contractors at relevant forums.

### **3.4 Monitoring and Measurement**

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

## **4. Records**

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

- Medupi Environmental A&I Register

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- EMPr

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 Procedure 200-1681 “Control of Records”.

## **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 1: KPA's/KPI's**

<b>Key Performance Area</b>	<b>Key Performance Indicator</b>	<b>Measure Frequency</b>	<b>Responsibility</b>	<b>Records</b>
Identification of all aspects in relation to the Project	All Aspects identified	As indicated in section 3.1	TM Environmental Department and Contractors	Aspect and Impacts Register
	All Aspects assessed	As indicated in section 3.2	TM Environmental Department	Aspects and Impacts Register
Assessment of all related Impacts in relation to the Project	All Aspects have at least one Impact	Where applicable	TM Environmental Department and Contractors	Aspect and Impacts Register
	Impact assessments accurate in relation to Severity and Probability	As required	TM Environmental Department	Aspects and Impacts Register
Review of A&I Register	Reviewed register and procedure	Annually or as required	TM Environmental Department and Contractors	Aspect and Impacts Register and updated procedure
Document control	Retain and store records generated as a result of this document as defined in the Procedure 200-1681 “Control of Records”.	Annually or as required	EMS Co-ordinator	As generated by the procedure

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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 Control"	Annually or as required	Environmental Manager	New revised document
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## **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 [medupiga@eskom.co.za](mailto:medupiga@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

## **5.3 Training Requirements**

Training in Environmental Risk Assessment is required to enable successful implementation of this process.

## **5.4 Acceptance**

This document has been seen and accepted by:

<b>Name</b>	<b>Designation</b>
Brenda Mgidlana	Quality Manager
Emile Marell	Environmental Manager
Z Shange	General Manager Acting: Medupi GCD

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## **6. Revisions**

<b>Date</b>	<b>Rev.</b>	<b>Compiler</b>	<b>Remarks</b>
2021/09/23	07	M Boshomane	Three Yearly review, including minor changes e.g. change in management
2018/05/19	06	M Boshomane	Audit finding corrective action
2018/02/14	05	M Boshomane	Annual Review including new ISO 104001:2015 changes and Assurance audit findings

## **7. Development Team**

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

- M Boshomane
- M Sebonego
- D Mudzielwana
- S Mamabolo
- L Zamxaka
- C Komape

## **8. Acknowledgements**

N/A


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## Appendix A – Process Self-Assessment Checklist


### A.1 Process Self-Assessment Checklist

	<b>MEDUPI POWER STATION PROJECT</b>			Template Identifier	348-655890	Rev	1
				Document Identifier	348-9990299	Rev	0
				Effective Date	25 June 2019		
				Next Review Date	25 June 2022		
<b>TITLE: Document Self-Assessment Checklist</b>							
Discipline: <b>Quality</b>		Applicable Document No.:348-860847 Medupi Environmental Aspects and Impacts Procedure				Self-Assessment Date:	
Item No	Ref Section	Self-Assessment Question	Compliant			Comment	
			Yes	Part	No		
1	2.5.1	Has an Environmental Aspect and Impact Register been compiled?					
2	3.1	Have the following facets been considered in determining the environmental aspects and associated impacts:					
3	3.1	• potential and actual impacts					
4	3.1	• positive and negative impacts					
5	3.1	• direct and indirect impacts (the use of a resource such as electricity indirectly uses water and fuels which are examples of indirect impacts)					
6	3.1	• inputs and outputs associated with current, past and planned activities, products and services					
7	3.1	• normal, abnormal and reasonable foreseeable emergency situations					
8	3.1	• potential secondary and cumulative impacts					
9	3.1	• The extent to which Medupi Power Station Project has control or influence over its activities, products and					

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	<b>MEDUPI POWER STATION PROJECT</b>				Template Identifier	348-655890	Rev	1
					Document Identifier	348-9990299	Rev	0
					Effective Date	25 June 2019		
					Next Review Date	25 June 2022		
<b>TITLE: Document Self-Assessment Checklist</b>								
		services.						
10	3.2	Have the environmental impacts been rated?						
11	6.2.2	Have the most significant impacts been identified?						
12	6.2.2	Have positive impacts been identified?						
Comments:								
Self-Assessment by:		Name:	Position:		Revision Required. (Yes / No)		Planned Revision Date:	



## Attachment A: Identification of Aspects and Impacts

Department: \_\_\_\_\_

Discipline: \_\_\_\_\_

[illegible][illegible]

**Attachment B: Quantification of Aspects and Impacts Significance Rating**

**Aspect:** \_\_\_\_\_

**Related Impact:** \_\_\_\_\_

Significance Criteria	256	16	4	2	1	Score
<b>Probability</b>	Impact will definitely occur	Impact may occur once annually	Impact may occur less than once annually but at least twice every five years	Impact may occur one to two times (maximum) in Station's life	Very unlikely for impact to occur / Impact will not occur	
<b>Severity</b>	Impact potentially reaches beyond national boundaries	Impact will potentially affect neighbouring provinces	Impact confined to local province	Impact confined to local region but not province wide	Impact confined to Eskom property / site	
<b>Frequency</b>	Continual or weekly occurrence	Impact will occur once a month	Impact will occur once a year	Impact will occur once every ten years	Possible that impact will never occur in Station's life	
<b>Receiving environment</b>	Very sensitive, pristine area – protected site or species permanently or seasonally present	Unused industrially zoned area containing indigenous and alien fauna / flora species	Semi-disturbed area already rehabilitated / recovered from prior impact	Disturbed area undergoing rehabilitation / recovering from prior impacts	Disturbed area, already in need of rehabilitation prior to impact	
<b>Toxicity</b>	Impact poisonous to natural environment and is not contained – no rehabilitation possible - permanent irreversible impact	Impact potentially poisonous to natural environment and is partially contained – some rehabilitation possible and is potentially reversible	Impact potentially poisonous to natural environment and is partially contained – complete rehabilitation possible	Impact is potentially poisonous to natural environment but is completely contained	Impact is not poisonous to natural environment	
<b>Legislation contravention</b>	Yes	Possibly if reporting / negotiation with Government not done in time and contravention status determined at Government or at Eskom (Head Office) discretion	Potentially No (if timely negotiations with Government undertaken)	Possibly No	No	
<b>Legal liability</b>	International, national and / or third party liability	Employee and / or third party liability	Potential for immediate employee and / or third party liability - communication	No immediate liability but communication with interested and affected	No	

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			with interested and affected parties required	parties required		
<b>Operational interference</b>	Yes	Possible	Potentially possible	No - unless under abnormal / emergency conditions	No	
<b>Reputational Risk</b>	Reputation impacted with all key stakeholders /Severe pressure to withdraw funding / cease business. Serious public or media outcry - international coverage	Reputation impacted with significant number of key stakeholders / Severe local and national public or press reaction	Reputation impacted with some stakeholders / Local public or press reaction	No discernible impact on reputation / Negligible reaction from parties concerned	No discernible impact on reputation/No public reaction	
<b>TOTAL SIGNIFICANCE RATING SCORE</b>						

**CONTROLLED DISCLOSURE**

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