

Procedure

Medupi Power Station Project

Medupi Environmental Communication Document Identifier: PPZ 200-38432 Title:

Procedure

Alternative Reference

Number:

Area of Applicability: **Medupi Power Station**

Project

Functional Area: **Environmental Management**

07 Revision:

Total Pages: 15

Review Period: **Annually**

Disclosure Classification: Controlled Disclosure

Current Change Note CN100066

Compiled by

QA, Interface & Governance Review **Functional** Responsibility Authorized by

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Date: 13/02/2018

Date: 15 . 0 2. 2018

Date: 16,

Revision: 07

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1. Introduction

1.1 Scope

1.1.1 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; and
- Define processes employed to ensure effective Environmental Consultation and Participation.

1.1.2 Applicability

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

1.1.3 Effective date

The Authorisation date will be the effective date

2. Normative/Informative References

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 Control Management Procedure	200 1680
Unit Construction Procedure Manual	200-163680
Medupi Environmental Policy	200-73797
Medupi EMS Scope and Manual	200-73971
Procedure for Environmental Legal and Other Requirements	200-73977
Procedure for the Identification and Assessment of Environmental Aspects and Impacts	200-73975
Environmental Incident Management Procedure	200-10506
Procedure for the Identification and Application of Environmental Operational Controls	200-73969
Procedure Handling Media Related Matters	200 - 44972

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2.2 Informative

ISO 9001:2015

• ISO 14001:2015

2.3 Definitions

Term	Definition
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.
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.

2.4 Abbreviations

Abbreviation or Acronym	Description
UM's	Unit Area Managers
ECO	Environmental Control Officer
EMC	Environmental Monitoring Committee
EMS	Environmental Management System
HSE	Health, Safety and Environment
I&AP(s)	Interested and Affected Party(ies)
TM	Team Medupi
RoD	Record of Decision
SEA	Senior Environmental Advisor
SPF	"Smart Plant Foundation" –ESKOM formal Document repository and tracking system

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 QMS procedure are defined in the Procedure RACI Matrix documented below:

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Table	Table 1: RACI MatrixRACI Matrix											
Process Step/Activity	TM Construction	Manager	TM Assurance	Department	ML	Communication	ЕСО	Contract Managers	TM Environmental	TM Environmental	Practitioner	Contractors
Receives Contractor Documentation								A, C		ı		
through SPF								, -				
Capture pertinent data on									A, C,	R		
Communications Register									I	'`		
Compiles response to Communications								C, I	Α	R		
Compiles Communications from/to I&APs							I		R, A	С		
Issue of Contractual notices and letters pertinent to Environment (all Contractors)	А							R	C, I			
Receives Complaints from I&APs and provides information thereon			I		I		R, A	I	С			
Interface with EMC			I				R, A		C, I			
Statutory /Regulatory communications	I		I		A, C	; ,			R			
Generates internal Communications								C, I	Α	R		
Contractors Environmental Forums	I				I			I	R, A	C,	I	R, I
Contractors SHE Forums	I							I	R,A	C,	I	R, I

2.6 Related/Supporting Documents

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

- Internal Communications (bulletins, documents, responses, MedupiEnvironment@eskom.co.za.)
- Minutes of Contractors SHE Meetings
- Minutes of Contractors Environmental Meeting
- Minutes of the quarterly EMC 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 Procedure 200-1680 "Document and Control Management Procedure".

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3. Procedure

3.1.1 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.
- The Project significant Environmental Aspect and Impact Register shall be communicated to external stakeholders upon request.

3.1.2 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.
- The TM Environmental Practitioner responds to such communications, via the relevant Contract Manager within stipulated timeframe.
- Such Formal Project communication to Contractors shall be done in writing (Letters with SPF number), and the Environmental Practitioner may consult with the Environmental Manager and Project Manager in compilation of response.

3.1.3 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 Environmental Manager.

Note;

According to the requirements of the Environmental Management Plan, the Medupi Independent ECO-function formally receives, registers and responds to complaints from external I&APs.

- The TM Environmental Manager captures details of the Communication on <u>MedupiEnvironment@eskom.co.za</u>.
- The TM Environmental Manager determines type of communication (Complaints, Queries, Statutory/Regulatory, or Press/Media).
- Where the communication is a Complaint, the following process is employed:
 - The TM Environmental Manager responds to the complaint via the TM Procedure for the Handling of Non-conformities and Corrective and Preventive Action.
 - The TM Environmental Manager shall provide regular updates to the ECO regarding the complaint so as to enable the ECO to provide feedback to the complainants.
 - Once the complaint has been suitably cleared or answered, the TM -Environmental Manager shall provide records of such to the ECO to issue formal response to the relevant complainants.
- Where the communication is a Query (request for information), the following process is employed;
 - The TM Environmental Manager shall formulate a response within 48 hours of receipt of such.

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 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 department.
- Where the communication emanates from a Statutory or Regulatory body;
 - The TM Environmental Manager shall forward all such communications to the Medupi Assurance Department, as well as the Medupi Communications Department.
 - Response to Statutory or Regulatory body communications shall be at the discretion of the Medupi Communications department, in consultation with the TM Environmental Manager, 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 (200 – 206879).

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

- The TM Environmental departments shall, on a regular basis, issue bulletins in relation to Environmental awareness. These bulletins shall be compiled according to Eskom applicable documents. These bulletins 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;
 - o Environmental Contractual obligations;
 - o Trends identified from VFL Observations; and
 - o Trends identified from Minor Environmental incidents
- Legal update bulletins 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
- Ad-hoc bulletins may be generated in cases of on-site:
 - Major Environmental Incidents

These bulletins shall show (amongst others);

- o A brief description of events,
- Lessons learnt,
- o Root Causes, and,
- Corrective and Preventive Actions identified
- All bulletins shall be recorded on the Communications Register (<u>MedupiEnvironment@eskom.co.za</u>).
- Communications, within the Environmental Team as well as between the Environmental Team and the Project Team and ECO Team are illustrated in attachment 8.

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3.1.5 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 Environmental Manager shall compile such Communication and register such on the Communications Register.
- Where such communication is Environmental-related, the Environmental Manager shall provide such to the ECO and the Communications department for review and distribution.

3.1.6 Environmental Management Consultation and Participation

- Quarterly Contractors SHE Meetings are chaired by the Medupi Construction Manager and are attended by TM and Contractors Senior Management and Applicable SHE personnel where Environmental performance and compliance is reported on and discussed.
- Contractors Environmental Meetings are held on a Quarterly basis, such meetings are chaired by the TM Environmental Manager and 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 Environmental Manager provides inputs as requested.

Note:

EMC agendas and minutes are distributed by the ECO, which acts independently from Medupi Project Team

 Actions arising from the above consultative meetings are tracked by the Environmental Manager, through use of the Procedure for the Handling of Non-conformities and Corrective and Preventive Action, where applicable.

4. Process for Monitoring

4.1 Key Performance Areas and Indicators

The following Key Performance Areas / Indicators (KPAs / KPIs) 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: KPAs/KPIs

Key Performance Area	Key Performance Indicator	Measure Frequency	Responsibility	Records	
Environmental	Communications acknowledged within 24 hours of receipt	Per communication	TM Environmental	Communications	
communications from I&AP's	Clearance of Communications within 7 days of receipt	Per communication	TM Environmental Manager	(Complaints) Register	
Environmental All relevant Environmental		On-going	Environmental	PCARS raised	

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Awareness increased	Incident Lessons Learnt and Corrective Actions communicated internally and to Contractors		Practitioners	and captured in appropriate registers
	Environmental awareness materials shared	On going	Environmental Practitioners/ Contractors	Copies of bulletins and captured as such in Communication register
HSE Participation increased	Environmental Meetings and HSE Management meetings occur at least quaterly	Quarterly	Environmental Manager	Minutes of the meetings
increased	Actions arising from above meetings undertaken in all cases	Next meeting	Environmental Manager	Minutes of the meetings
Document control	Retain and store records generated as a result of this document as defined in the Procedure 200-1680 "Document and Control 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 Control Management Procedure"	Annually or as required	Environmental 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.

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 medupiqa@eskom.co.za by the Process Owner once completed.

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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"

4.2.2 Revision Period

Three yearly

4.3 Training Requirements

Training in operational requirements of this procedure is undertaken by the respective Process Owner and Line Managers.

5. Acceptance

This document has been seen and accepted by:

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

6. Revisions

Date	Rev.	Compiler	Remarks
2018/02/10	07	M Bosomane	Annual Review including new ISO 104001:2015 and new document template changes
2015/10/25	06	S Mamabolo	Annual Review
2014/04/22	05	N Nengovhela	Annual Review

7. Development Team

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

- M Boshomane
- M Sebonego
- E Marell

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Appendix A - Process Self-Assessment Checklist

Discip	Discipline: Environment		Applicable Document No.: PPZ 200-38432 Rev	07				Self Assessment Date: / /
Item Ref		Solf	Agggement Question	Compliant			omment	
No	Section	Self-Assessment Question		Yes	Part	No	C	Jillilent
1	5.2.2	Department copy the	communication sent from the TM Environmental communal environmental email address: m.co.za This email address will serve as the					
2	5.2.2		Environmental Aspect and Impact Register stakeholders upon request?					
3	5.2.1	Are formal Communication	s issued through Document Control functions?					
4	5.2.1	Does the Environmental Pr Controller?	actitioner receive communication via Document					
5	5.2.1	Does the TM Environmenta via relevant contracts mana	al Practitioner respond to such communications ager?					
6	5.2.1	Are such Formal Project co	mmunications to Contractors done in writing					
8	5.2.2		m I&APs (non-contractors and external to TM) nental Department provided/forwarded to the					
9	5.2.2	Does the TM Environmenta on MedupiEnvironment@e	al Manager capture detail of the Communication skom.co.za?					
10	5.2.2		al Manager determine the type of s, Queries, Statutory/Regulatory, or					

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10.1	5.2.2	When a complaint is raised, are the correct process followed?	
10.2	5.2.2	TM Environmental Manager respond to the complaint via the TM Procedure for the Handling of Non-conformities and Corrective and Preventive Action?	
10.3	5.2.2	TM Environmental Manager provide regular updates to the ECO regarding the complaint so as to enable the ECO to provide feedback to the complainants?	
10.4	5.2.2	TM Environmental Manager provide records of resolution of such complaints to the ECO to issue formal response to the relevant complainants?	
11	5.2.2	Where the communication is a Query (request for information), is the following process is employed:	
11.1	5.2.2	Does the TM Environmental Manager formulate a response within 48 hours of receipt of such?	
11.2	5.2.2	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?	
12	5.2.2	No member of TM HSE shall interact directly with any Press/Media organisations.	
12.1	5.2.2	Are all such approaches or requests directed to the TM Communications department?	
13	5.2.2	Where the communication emanates from a Statutory or Regulatory body:	
13.1	5.2.2	Does the TM Environmental Manager forward all such communications to the Medupi Assurance Department, as well as the Medupi Communications Department?	
13.2	5.2.2	Does the TM Environmental Manager evaluate the communication to ascertain whether such constitutes a change in Legal or Other Requirements?	
13.3	5.2.2	Are the Response to Statutory or Regulatory body communications at the discretion of the Medupi Communications department, in consultation with the TM Environmental Manager,	

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		as well the relevant Eskom Assurance functions?		
14	5.2.3	Do the TM Environmental departments, on a regular basis, issue bulletins in relation to Environmental awareness?		
15	5.2.3	Are Legal update bulletins generated as and when required based on information received from Eskom or appointed Service provider?		
16	5.2.3	Are Ad-hoc bulletins generated in the case of:		
16.1	5.2.3	Major Environmental Incidents		
17	5.2.3	Do these bulletins include:		
17.1	5.2.3	A brief description of events		
17.2	5.2.3	Lessons learnt		
17.3	5.2.3	Root Causes		
18	5.2.3	Corrective Actions identified		
19	5.2.3	Are all bulletins recorded on the MedupiEnvironment@eskom.co.za?		
19.1	5.2.4	Communications generated by Team Medupi for consumption outside of the Medupi Project		
19.2	5.2.4	Do Communications arising from Emergencies and Incidents to Interested and Affected parties occur via the relevant Procedures?		
19.3	5.2.4	Where the need for generation of Communication to I&AP(s) exists does the H&S/E Manager compile such Communication and register such on the MedupiEnvironment@eskom.co.za?		
20	5.2.4	Where such communication is Environmental-related, does the Environmental Manager provide such to the ECO and the		

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		Communications department for review and distribu	tion?			
20.1	5.3.1	Environmental Management Consultation and Participation				
20.2	5.3	 Are Contractors Environmental meetings held on a and such meetings chaired by TM Environmental attended by ECO, TM Environmental Practitione designated environmental resources of all contractor 	Manager and rs as well as			
20.3	5.3	Does an Environmental Monitoring Committee (EMC) exist, representing I&APs, to which the TM Environmental Manager may provide inputs as requested by the ECO?				
Comm	ents:					
Self-Ass	sessment l	by: Name: Po	sition:		Revision Required? (Yes / No)	Planned Revision Date:

Unique Identifier:

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Attachment B 200-206879 Environmental External Communication Register

Attendees:

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200- 206879 Environmental - External Communication Register								
REF No	SPF NUMBER	NAME EXTERNAL PARTY/AUTHORITY	DOCUMENT TITLE/DESCRIPTION	ISSUE DATE	DATE OF RESPONSE	STATUS/COMMENT		
e.g. ENV15/LT/001	e.g. 257-222912		e.g. MEDUPI POWER STATION WATER USE LICENCE'S (LICENCE NO: 27086983 AND 01/A42G/A/743): SUBMISION OF INTERNAL AND EXTERNAL AUDIT REPORTS	e.g. 20-05-2015	e.g.NONE			

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