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 <p>ASSMANG MANGANESE BLACK ROCK MINE OPERATIONS</p>	ASSMANG LIMITED	Revision No.: 3.0
	Appendix 6: Contractor Environmental Requirements	Next Revision Date: 2016/06/28
	Document No: PRO-SHE-E-Ge-G-1950	Effective Date: 2014/07/28

Appendix 6: Contractor Environmental Requirements

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1. Purpose

The purpose of this procedure is to describe the environmental management requirement for contractors during the procurement, construction and commissioning phases of projects.

2. Scope

The procedure is applicable to all contractors doing work for or on behalf of the Black Rock Mine Operations.

3. References

- 3.1. All applicable legal requirements as outlined in the BRMO SHE Legal Register
- 3.2. ISO14001:2004 Environmental Management System

4. Abbreviations & Definitions

- 4.1. ISO: International Organisation for Standardisation
- 4.2. BRMO: Black Rock Mine Operations
- 4.3. BREP: Black Rock Mine Expansion Project
- 4.4. CD: Compact Disc
- 4.5. Client: Black Rock Mine Operations
- 4.6. Green File: A file containing all BRMO's Environmental Requirements
- 4.7. EMP: Environmental Management Programme/Plan
- 4.8. EPCM: Engineering, Procurement and Construction Management
- 4.9. CV: Curriculum Vitae

5. Responsibilities

- 5.1. Responsibilities are detailed in the procedure.

6. General

- 6.1. This Procedure describes the environmental management requirement for contractors during the construction and commissioning phases of projects. All requirements reflected within this document and its references/ attachment, must be consistently met. It is imperative that the Contractor carefully review this document and its references/ attachments, including the Environmental Management System Procedures in order to ensure that the necessary costs are allowed for in the tender to meet such requirements. The Environmental Management System and Operational Control Procedures have been issued on a CD as an attachment to the original enquiry document.
- 6.2. Should there be any unclear aspects, please arrange for clarification with the Client's Representative before submitting the tender.

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6.3. This specification, including all its references/ attachments, will be deemed part of the contract between the successful contractor and the Client / Client Representative and will therefore be contractually binding.

7. Description of Procedure

7.1. Overview of steps from receipt of enquiry to site establishment (environmental perspective)

7.1.1. The following table explains the logical flow of the process from the receipt of the enquiry document by all contractors to actual site establishment by the successful contractor. This will create understanding of exactly what the expectations and responsibilities are.

7.1.2. This process will be managed by the EPCM and/or BRMO Environmental Management Section depending on the project specifications. Refer Table 1

Table 1: Process Flow

ACTIVITY	WHO
Receive enquiry document.	Contractor
Ensure environmental documentation is received	Contractor
Review Environmental Contractor Management Procedure	Contractor
Prepare Environmental Documents for tender and submit as part of tender (Refer to section below) it is vital for the contractor to study this document and all its references / attachments in detail in order to ensure that adequate costs have been allowed for in the tender to ensure that all requirements can be consistently met.	Contractor
Conduct Environmental Adjudication on the basis of information supplied by the contractor.	The EPCM and/or BRMO Environmental Management Section
Draft the Environmental Report and recommendation.	The EPCM and/ or BRMO Environmental Management Section
Client to review and approve.	Client and/or BRMO
Conduct an Environmental Risk Assessment and Determine Green File requirements	Contractor and EPCM and/or BRMO Environmental Management Section
Provide Green File training upon request	The EPCM and/or BRMO Environmental Management Section
Prepare documents required for completion of Green File in advance of site establishment.	Contractor, EPCM and BRMO

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ACTIVITY	WHO
Contractor internal approval. Note only signed copies of contractor site specific procedures should be available on site.	Contractor
Review and comment / approve/ accept documents.	The EPCM and/or BRMO
Client approval on Green File	Client and/or BRMO
Commence with site establishment	Contractor
Site Inspections and Audits	Contractor, The EPCM, Client, Third Parties and/or BRMO

7.1.3. The following documentation must be provided with the tender submittal in order to assist with the contractor adjudication in terms of environmental performance. Should the requested information not be provided then it will be assumed that it does not exist. The documentation must be contained in a folder with a contents page and dividers between various documents. The folder must be submitted as an annexure to the tender document.

- 7.1.3.1. Schematic overview of the organisational structure for site (Organogram including an environmental representative);
- 7.1.3.2. The expected environmental responsibilities of all personnel reflected on the above organogram;
- 7.1.3.3. CV of the proposed environmental representative to whom information can be supplied and obtained and who will be responsible for general daily environmental checks;
- 7.1.3.4. Environmental Policy (if separate from the Health, Safety, Environmental and Community policy), signed and dated;
- 7.1.3.5. Provide copies of certificates, should you have any valid certification/ audits of international Environmental Management System such as ISO 14001;
- 7.1.3.6. Provide an overview of your Environmental Management System and any environmental management procedures that you work according to;
- 7.1.3.7. Provide a synopsis of environmental incidents experienced at your sites during the past six – month period. (Name, date, short description, type of incident, remedial action taken);
- 7.1.3.8. Provide a detailed breakdown that reflects all costs related to environmental management by you, the contractor, for the project; and
- 7.1.3.9. A signed statement acknowledging that the contractor has received, review and accepted the Environmental Specification as an integral part of his contractual obligations and that his tender includes all funding necessary to meet all obligations stipulated therein.

7.2. Site Environmental Requirements

7.2.1. Policy, Leadership and Commitment

7.2.1.1. Management members of the Contractor must:

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- Understand and comply to the approved Environmental Management Plan of the project;
- Promote the involvement of all employees to continuously improve environmental management;
- Ensure adherence to the site Environmental Contractor's **EMP** and any other environmental procedures as issued by the Client;
- Participate in Environmental audits and ensure that corrective actions are executed;
- Ensure reporting of all environmental matters and performance (especially environmental incidents) to the Principal's Project Manager and/or Construction Manager before end of shift;
- Conduct regular workplace inspections; and
- Ensure that all Environmental Requirements are communicated to relevant employees.

7.2.2. Legal and Other Requirements

- 7.2.2.1. Any breach of a legal requirement will be deemed to be a direct breach of contractual obligation.
- 7.2.2.2. All verbal / written instructions given in terms of environmental management (for example Environmental Management Plan) must be adhered to and executed without any delay.

7.2.3. Aspects, Impacts, Objectives and Targets

- 7.2.3.1. The contractor will need to ensure that all aspects and impacts that can result in environmental degradation through their operations are identified and documented. A risk assessment regarding these aspects is required.
- 7.2.3.2. Objectives and targets will need to be established for aspects and impacts that are deemed to be significant. These objectives and targets will need to be documented and conveyed to all contractor personnel.

7.2.4. Training, Awareness and Competence

The following training is mandatory and must be completed by all contractors on site.

Table 2: Training Requirements

Training	Who	When	Duration
Environmental EMP	All site personnel from management members to General Workers		
BRMO Procedures and Contractor Site Specific Procedures	All site personnel from management members to General Workers		

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Training	Who	When	Duration
ISO 14001 Awareness Training	All personnel on site from management members to general employees.		
Spill Kit Training	General Employees who will be responsible for clean-up of spills		
MSDS Training	General Employees who will be responsible for managing and working with chemicals		

7.2.4.1. Records of all training must be presented or else it will be accepted that training has not been done. The contractor must appoint a competent environmental representative for the project.

7.2.4.2. The environmental representative must be on site when work commences and be present daily until all activities are completed. Where contractor activities will be seven days a week, required coverage must be available at all times.

7.2.5. Communication, Consultation and Involvement

7.2.5.1. All employees will be expected to attend toolbox talks every morning, where amongst others, environmental topics will be discussed.

7.2.5.2. Environmental Representatives, Safety Officers and Management members will be required to attend weekly project management meetings.

7.2.6. Document and Data Control

7.2.6.1. The contractor must keep the following documents on site:

- The approved Environmental Management Plan;
- The Authorisation/Record of Decision (RoD) for the project; and
- Monthly environmental compliance reports.

7.2.6.2. All contractor documentation should be controlled and easily accessible.

7.2.7. Emergency Preparedness and Response

7.2.7.1. Emergency response plans, developed from a review of potential emergency scenarios (including environmental incidences), will be in place before commencement of work.

7.2.7.2. The contractor must inform all employees regarding relevant emergency procedures and conduct at least monthly emergency drills.

7.2.8. Incident Report and Investigation

7.2.8.1. All environmental incidents, however minor, must be reported to the **Shift Supervisor and the environmental section and structures as dictated by the environmental communications structure.**

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7.2.8.2. Environmental Incident booklets should be completed.

7.2.8.3. Each contractor will be responsible of the investigation of relevant incidents. Incident records must be kept for a period of at least twelve months after completion of the project.

7.2.9. Monitoring and Review

The EPCM, BRMO and Client personnel will conduct regular environmental audits. Contractors are expected to participate and give full cooperation during such assessments. Sub-contractors will be included during audits.

8. Records

No	Record	Ref.	Resp. Person	Storage	Retention Period	Disposition
1	Inspection Reports	N/A	Environmental Manager	Office and Green File	Duration of Contract	Shred

9. Appendix

None