

MANAGEMENT PROCEDURES

1. Functions and Responsibilities for the Construction Phase

Formal responsibilities are necessary to ensure that key procedures are executed. Specific responsibilities of the MD: Department of Transport, Roads and Public Works (DTRPW), Project Manager and Environmental Control Officer for the construction phase of this project are as detailed below (Martin, 2007).

The MD: Department of Transport, Roads and Public Works (DTRPW) will:

- Ensure that the Contractor(s) is aware of all specifications, legal constraints and standards and procedures pertaining to the project specifically with regards to the environment;
- Ensure that all stipulations within the EMP are communicated and adhered to by Department of Transport, Roads and Public Works (DTRPW) and its Contractor(s);
- Monitor the implementation of the EMP throughout the project by means of site inspections and meetings. This will be documented as part of the site meeting minutes; and
- Be fully conversant with all relevant environmental legislation. (Martin, 2007)

The Project Manager will:

- Be fully conversant with the Environmental Management Plan;
- Be fully conversant with all relevant environmental legislation and ensure compliance with these;
- Have overall responsibility for the implementation of the EMP;
- Conduct audits to ensure compliance to the EMP;
- Liaise with the MD: Department of Transport, Roads and Public Works (DTRPW) or his delegate, the Environmental Control Officer and relevant discipline Engineers on matters concerning the environment;
- Prevent actions that will harm or may cause harm to the environment, and take steps to prevent pollution on the site; and
- Confine activities to the demarcated construction site. (Martin, 2007)

The Environmental Control Officer (ECO) will:

- Be fully conversant with the Environmental Management Plan;
- Be fully conversant with all relevant environmental legislation and ensure compliance with them;
- Convey the contents of this document to the Contractor site staff and discuss the contents in detail with the Project Manager and Contractor. Training will be required to ensure all staff understands the process
- Undertake regular and comprehensive inspection of the site and surrounding areas in order to monitor compliance with the EMP and Environmental Authorisation (or Record of Decision);
- Take appropriate action if the specifications contained in the EMP are not followed;
- Monitor and verify that environmental impacts are kept to a minimum, as far as possible;
- Review and approve construction methods (where it could result in environmental impacts), with input from the Project Manager, where necessary;

- Ensure that activities on site comply with all relevant environmental legislation;
- Order the removal from the construction site of any person(s) and/or equipment in contravention of the specifications of the EMP;
- Compile progress reports on a regular basis, with input from the Project Manager, for submission to the MD: Department of Transport, Roads and Public Works (DTRPW), including a final post-mining/construction audit;
- Liaise with the Project Manager regarding the monitoring of the site; and
- Report any non-compliance or remedial measures that need to be applied to the appropriate authorities. (Martin, 2007)

Contractors and Service Providers:

All Contractors (including subcontractors and staff) and service providers are ultimately responsible for:

- Complying with the environmental management specifications;
- Submitting an obligatory Methods Statement for approval by the ECO before any work is undertaken (Annexure A);
- Adhering to any instructions issued by the Project Manager on advice of the ECO;
- Submitting a report at each site meeting which will document all incidents that have occurred during the period before the site meeting;
- Keeping on file the list of transgressions issued by the ECO in the site office;
- Maintaining a public complaints register; and
- Arrange for all employees and those of subcontractors to receive training before the commencement of construction in order that they are aware of the conditions of the EMP. (Martin, 2007)

2. Monitoring

A monitoring programme will be put in place not only to ensure conformance with the EMP through the contract/work instruction specifications, but also to monitor any environmental issues and impacts which have not been accounted for in the EMP that are, or could result in significant environmental impacts for which corrective action is required (Martin, 2007).

As part of the contract or work instruction, the MD: Department of Transport, Roads and Public Works (DTRPW) will ensure that monitoring is done on a weekly basis. The Project Manager will ensure that the monitoring is carried out. An Environmental Control Officer must be appointed to ensure compliance with the EMP, and to carry out monitoring activities. The Environmental Control Officer must have the appropriate experience and qualifications to undertake the necessary tasks. The Environmental Control Officer will report to the Project Manager should any non-compliance be evident or corrective action necessary. (Martin, 2007)

All instruments and devices used for the measurement or monitoring of any aspect of this EMP must be calibrated, appropriately operated and maintained, and records well kept. (Martin, 2007)

3. Non-Conformance and Corrective Action

The monitoring of the mining and construction or operation of the road may identify non-conformances to the EMP. Non-conformances may also be identified through incidents, emergencies or complaints. In order to correct these non-conformances, the source must be determined and appropriate corrective actions must be identified.

3.1 Compliance with the Environmental Management Plan

- The EMP will be available on-site at all times;
- All persons employed by the Contractor or his sub-contractors will abide by the requirements of the EMP;
- Any members of the construction workforce found to be in breach of any of the specifications contained within the EMP may be ordered by the Project Manager to leave the site. The order may be given orally or in writing. Confirmation of an oral order will be provided as soon as practically possible, but the absence of a written order will not be cause for an offender to remain on site. No extension of time will be granted for any delay or disadvantage to the Contractor brought about by an offender ordered to leave the site;
- The Contractor will not direct a person to undertake any activity which would place them in contravention of the specifications contained within the EMP;
- Should the Contractor be in breach of any of the specifications contained in the EMP, the Project Manager will, in writing, instruct the Contractor responsible for the incident of non-compliance regarding corrective and/or remedial action required, specify a timeframe for implementation of these actions, implement a penalty and/or indicate that work will be suspended should non-compliance continue;
- Should non-compliance continue, further written notification will be forwarded to the Contractor responsible for the incident of non-compliance outlining the required corrective and/or remedial action, the timeframe for implementation, penalties and/or work will be suspended as specified previously;
- The Contractor will be responsible and will bear the cost of any delays, corrective or remedial actions required as a result of non-compliance with the specifications and clauses of the EMP;
- An appropriate reporting schedule for frequent reporting (of compliance with the EMP) to the MD: Department of Transport, Roads and Public Works (DTRPW) will be developed; and
- Departmental officials will be given access to the property for the purpose of assessing and/or monitoring compliance with the conditions contained in the EMP, at all reasonable times. (Martin, 2007)