

## 8 OPERATIONAL MANAGEMENT

### 8.1 Organisational structure

#### 8.1.1 Group structure

Rand Carbide was acquired by Highveld Steel and Vanadium Limited in 1978 and formed part of the Highveld Steel and Vanadium Limited group with Vanchem and Transalloys. The Rand Carbide division of Highveld Steel and Vanadium Limited was sold in February 2008 to Silicon Smelters (Pty) Ltd, which is a subsidiary of FerroAtlantica (Spain). The company is now referred to as Silicon Smelters (Pty) Ltd - Rand Carbide.

#### 8.1.2 Management structure

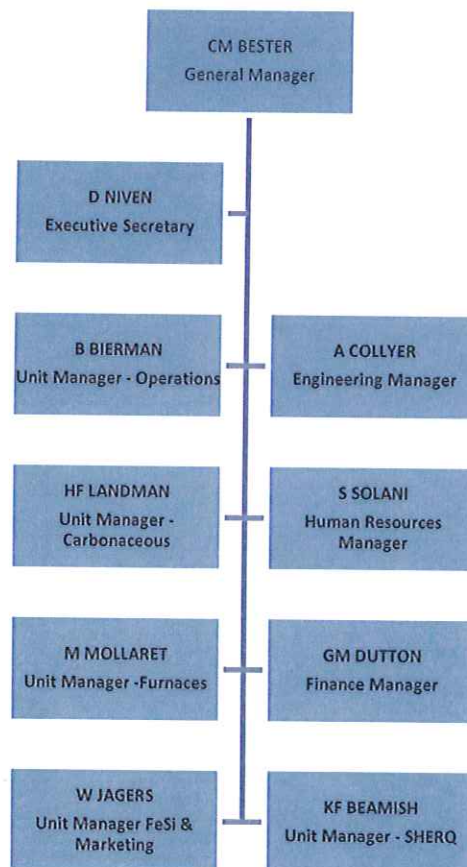


Figure 8-1: Management structure at Rand Carbide

### 8.2 Environmental Management: Resources

Ms Kerry Beamish, Unit manager: SHEQ is responsible for environmental management at Rand Carbide. The SHEQ department also has a SHEQ superintendent.

### 8.3 Awareness and training

Personnel need to be equipped with the knowledge, skills and training to enable them to manage their task competently. While management will ultimately be responsible and accountable, personnel should also be given responsibility and accountability to report to management on certain aspects. Basic water knowledge and water conservation training

and awareness can be included in inductions. A water awareness campaign to educate the community and employees on the importance of water conservation will also be initiated.

## 8.4 Communication

The goal for proficient communication within Rand Carbide is to provide structures for effective communication, participation and consultation that relate to the organization's occupational health and safety hazards, environmental hazards (aspects) and the Safety, Health, Environment & Quality (SHEQ) management system.

The procedure presented here is applicable to all SHEQ management system activities that relate to communication, participation and consultation.

The **objective of the communication procedure** is to ensure that the requirements in terms of ISO 9001:2008 clause 5.5.3, OHSAS 18001:2007 clause 4.4.3 and ISO 14001:2004 clause 4.4.3 are complied with. It includes the establishment, implementation and maintenance of processes/structures for:

- a) Internal communication among various levels and functions of the organization.
- b) Communication with contractors, service providers and other visitors to the workplace.
- c) Receiving, documenting and responding to relevant communications from external interested parties.
- d) The participation of workers by their:
  - o Appropriate involvement in hazard identification, risk assessments and determination of controls;
  - o Appropriate involvement in incident investigation;
  - o Involvement in the development and review of occupational health and safety policies and objectives;
  - o Consultation where there are any changes that affect their occupational health and safety; and
  - o Representation on occupational health and safety matters.
- e) Workers being informed about their participation arrangements, including who is their representative(s) on occupational health and safety matters.
- f) Consultation with contractors and service providers where there are changes that affect their occupational health and safety.
- g) Consultation where appropriate with external parties about pertinent occupational health and safety matters.
- h) Communication taking place regarding the effectiveness of the SHEQ management system.
- i) External communication relating to the corporation's significant environmental hazards (aspects).

Communication, participation and consultation with regards to customers or their agents and suppliers are handled through Marketing Services (Polokwane) and the Buying Department, respectively.

The **SHEQ and/or Administration department** has the responsibility, designated authority and accountability to ensure that:

- External communication processes are established, implemented and maintained. These processes shall include communication with the media (press releases), governmental departments, provincial and local authorities as well as interested and affected parties (I&APs) on occupational health and safety as well as environmental issues.

- Internal communication processes are established, implemented and maintained. These processes shall include the communication processes for obtaining information relating to responses required and/or requested by external parties.
- Internal communication processes are established, implemented and maintained in terms of legal and other requirements applicable to the corporation and to which the corporation subscribes. Such processes shall include communication channels where there are amendments or new legislation come into effect.

**Management** has the responsibility, designated authority and accountability to ensure that effective communication processes are established, implemented and maintained. Management is to ensure consultative processes are established, implemented and maintained to encourage participation and involvement of employees in:

- the development and review of environmental and occupational health and safety policies and in the management of hazards;
- changes that affect workplace health and safety;
- representative forums on health and safety matters; and
- informing employees as to who is their occupational health and safety representative and designated management appointee.

**All employees** have the responsibility to conduct themselves in a circumspect manner ensuring that the image of the corporation is not damaged or discredited in any manner or means. In this regard specific reference is made to the Business Ethics Policy of the corporation sections 4 and 7 which deal in particular with:

- Conduct of employees (4.1)
- Disclosure of information (4.2)
- Dealing with the media, outside persons and organizations (7)

All units shall establish appropriate channels for internal communication, participation and consultation processes in accordance with the process map presented as Figure 8-2.

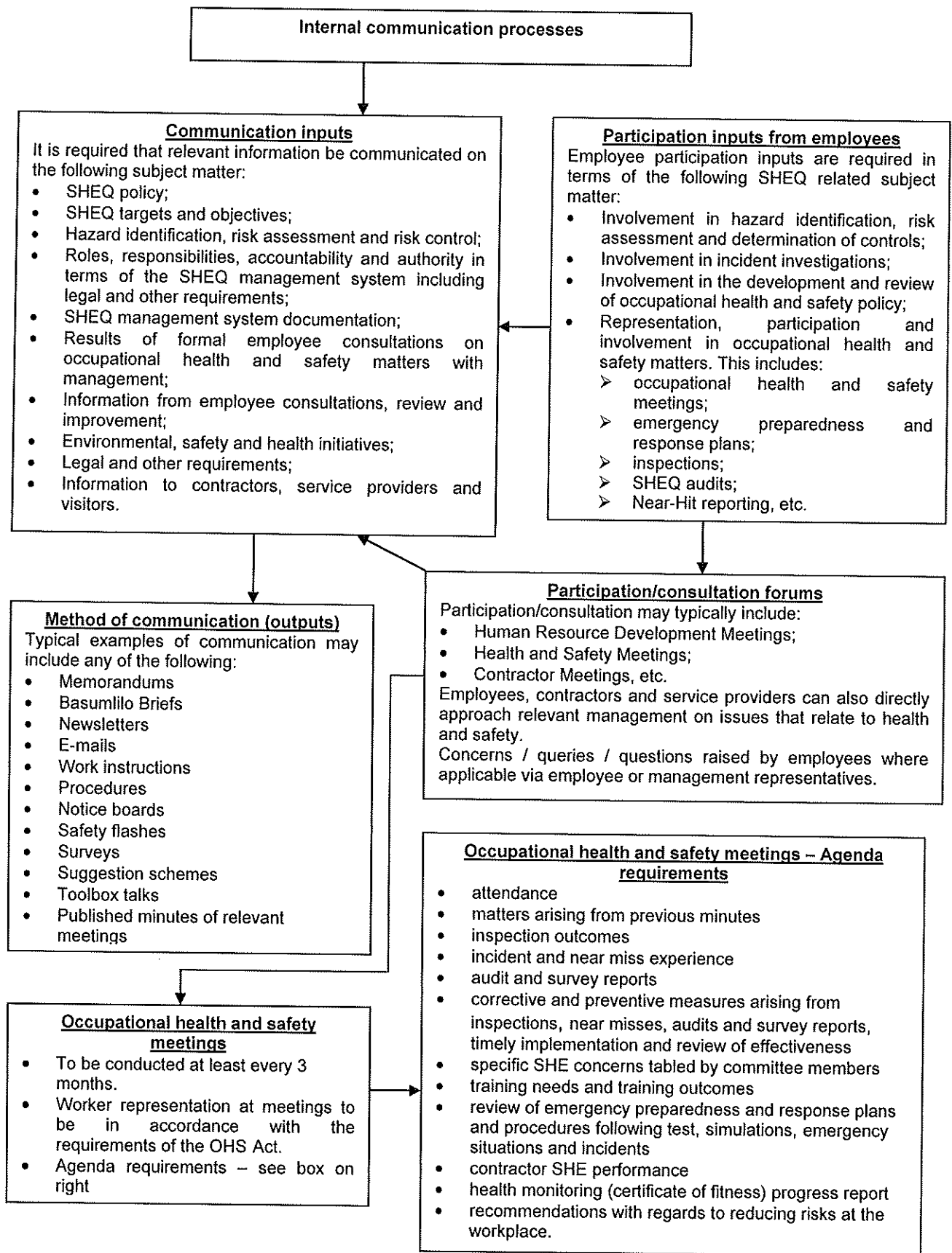


Figure 8-2: Process map – Internal communication, participation and consultation

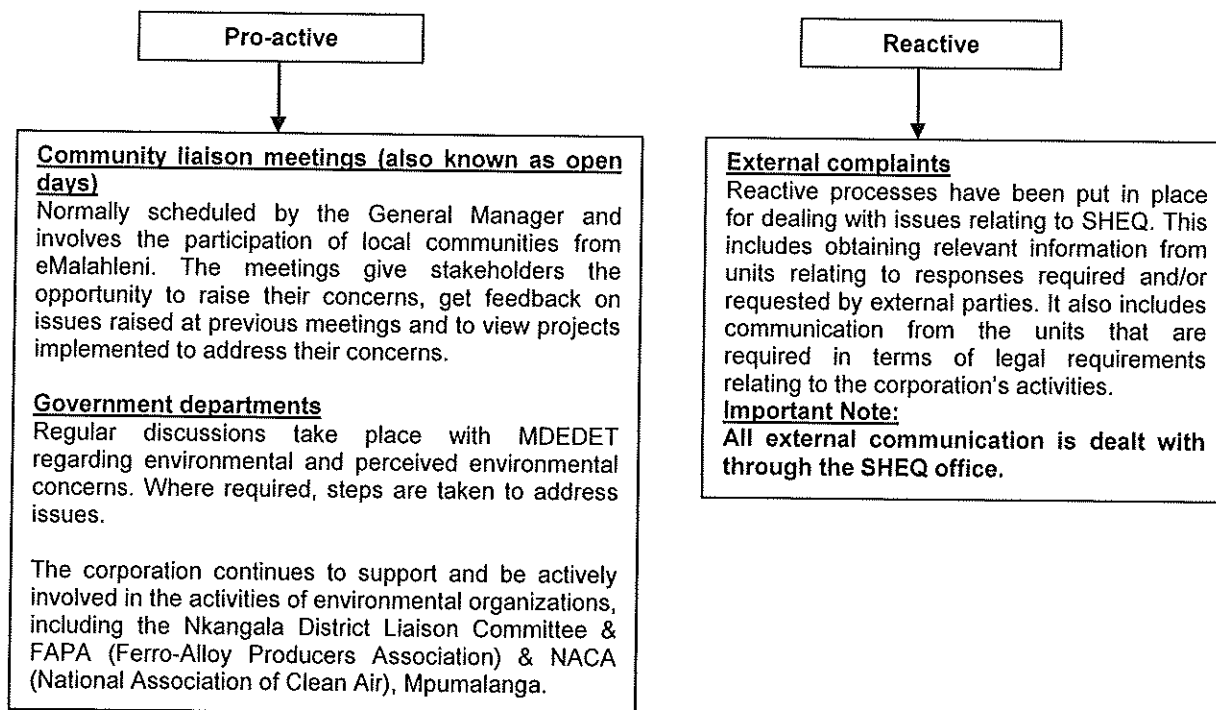


Figure 8-3: Process map – External communication, participation and consultation

8.4.1 Identification of Stakeholders

It is important to consider and address the concerns and requirements that stakeholders might have. Stakeholders include the relevant government departments (authorities), interest groups (community working groups), employees and the general public (Interested and Affected Parties). Surrounding communities are directly or indirectly influenced by Rand Carbide and communication with these communities is therefore important.

Potential stakeholders were identified during a site visit (20 July 2011) and via an existing database provided by Rand Carbide based on previous projects for the site, through notices placed on site and through placing a notice in the local newspaper (Witbank News).

A stakeholder register was compiled that includes national, provincial and local authorities, government departments, organisations and neighbours that may have an interest in the project. Notices and background information were distributed to all these stakeholders.

Figure 8-4 indicates the identification of stakeholders. Below is a summary of identified stakeholders who were notified:

**National authorities:**

- Department of Water Affairs (DWA)
- Department of Environmental Affairs (DEA)
- Department of Agriculture, Forestry & Fisheries (DAFF)
- Department of Health

**Neighbouring Businesses:**

- On site (Bakwena)
- Along Middelburg Road – west (Witbank Industrial City)
- Along Christiaan de Wet Street – south west (Afgri, Afrox)
- In Arnhem Crescent (Die Heuwel Industrial Park) – north east
- Along OR Tambo Road – north (Process Park)

**Provincial authority:**

- Mpumalanga Department of Economic Development, Environment & Tourism (MDEDET)

**Neighbouring Residents (private):**

- In Christiaan de Wet Street – south west
- Breda Street & Eindhoeven Street – east (Die Herberg, Den Haag Tuine)

**Local authorities:**

- Nkangala District Municipality
- eMalahleni Local Municipality

**Other:**

- School – south (HTS Witbank)
- South African Heritage Resource Agency

A total of 90 individuals (43 from government departments and 47 private) were identified and notified.

**8.4.2 Public liaison and Forum participation**

Transparent communication and liaison with authorities, catchment management agencies (CMAs) and downstream water users are essential. Stakeholders' constitutional rights (Constitution of the Republic of South Africa, 1996 (Act 108 of 1996)), expectations and concerns should be considered by ensuring that upstream and downstream users are not adversely affected, sensitive habitats are protected and a progressive improvement of environmental performance is achieved. The catchment should thus also be considered, within the larger context of resource quality objectives, the Reserve, and water use requirements. Surrounding communities are directly or indirectly influenced by Rand Carbide and communication with these communities is therefore important. Communication media such as placards, posters, leaflets, information letters, display boards, forums, SHEQ reports etc should be used.

**General:** Public consultation is held every second month in terms of general information sharing and complaints received. A complaints register (Appendix E) is kept and complaints are regularly received due to Rand Carbide's proximity to residential areas of Witbank. Complaints relate mostly to dust and noise and complaints on water discharges are rare. The last complaint was made verbally to HydroScience during the public participation process in July 2011.

**This project:** Public participation in terms of this IWWMP and associated WULA was conducted in accordance with Sections 54 to 57 of Regulation 543 of NEMA (1998), as amended. As such, identified I&APs were notified, through a newspaper notice, site notices and delivered notices, that Rand Carbide was in the process of applying for a waste management licence in terms of NEM:WA (2008), as well as a water use licence in terms of Section 21 of the NWA (1998). Please refer to Appendix F for the full public participation report. A total of 90 stakeholders were notified.

**Forum:** Rand Carbide is part of the NACA in Mpumalanga Province and the FAPA in Nkangala District.

**Concerns raised:** The only concern that was raised during this public liaison process was dust. This IWWMP includes a motivation for the use of water for dust suppression to address this concern.

**8.4.3 Distribution of information**

Newspaper notices were placed in the Witbank News (20 July 2011).

Site notices were placed along the Rand Carbide boundary fence in three (3) different positions (in place since July 2011).

Background Information Documents (BID) were distributed in July 2011 by hand, e-mail and fax.

Documents were made available for review in the public library in Witbank (for a period of 40 days).

#### **8.4.4 Public meeting**

No public meeting has been held in terms of this IWWMP and associated WULA.

#### **8.4.5 Documents for public review**

The following documents were made available for public review:

- Notices (in Witbank News newspaper and on site boundary fence);
- Background Information Documents (BID);
- Scoping Report for waste management licence application (Witbank public library);
- Environmental Impact Report for waste management licence application (Witbank public library);
- Environmental Management Programme for waste management licence application (Witbank public library); and
- IWWMP (this document at Witbank public library in August 2012).

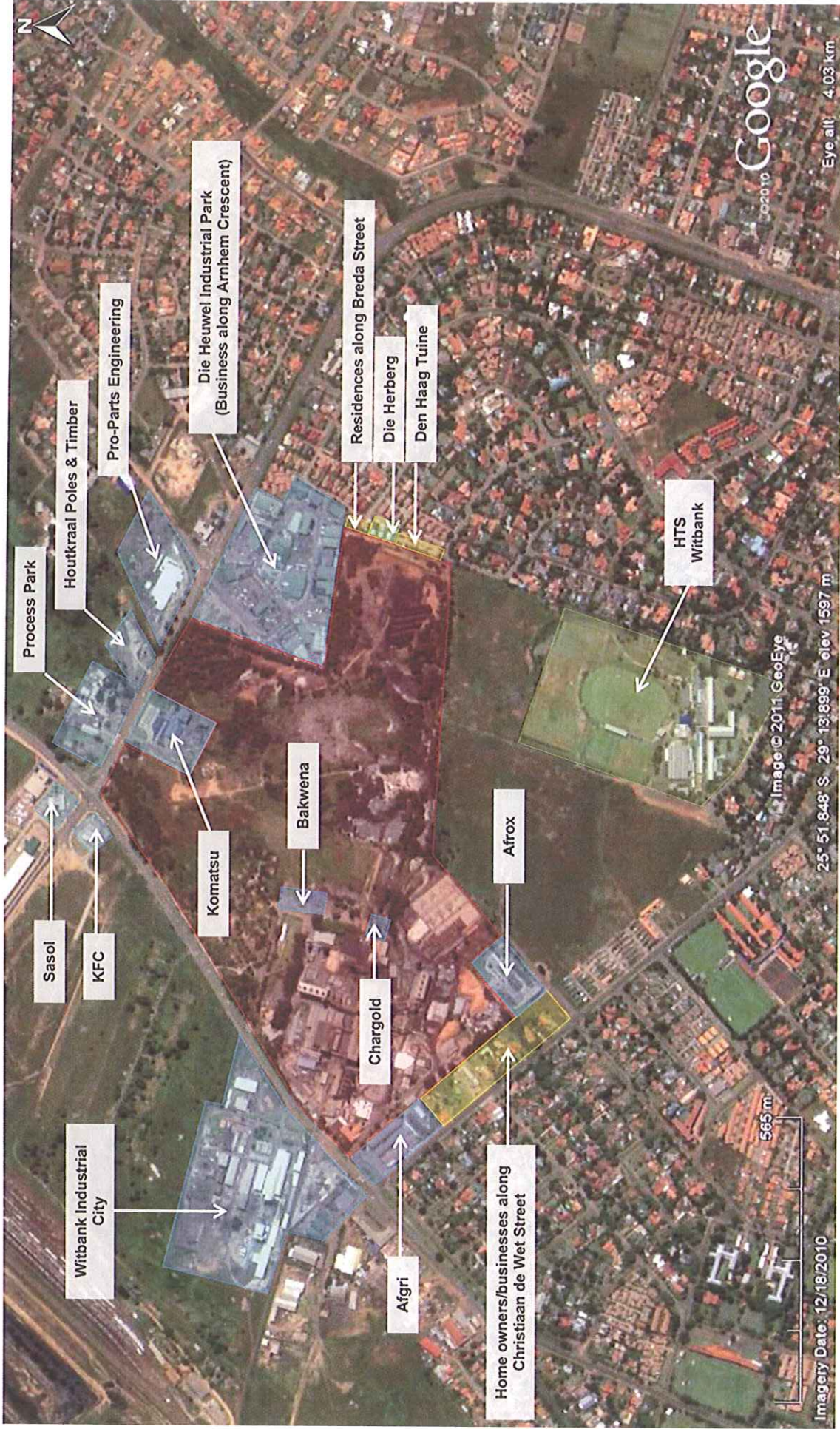


Figure 8-4: Stakeholder identification map