



## Minutes of ASPASA Environmental Committee

Venue: ASPASA offices  
Date: 27<sup>th</sup> March 2017  
Time: 10h00  
Chair: Alan Cluett  
Minutes: Colleen Cluett

### Opening by Nico Pienaar

- 🌿 The purpose of the meeting is to revive the ASPASA Environmental Committee following a request from the ASPASA Management Committee.
- 🌿 Alan Cluett has been appointed as the Chairperson.
- 🌿 This appointment is consistent with other specialist committees where the Chairpersons appointed are also recognised industry experts.
- 🌿 Concludes that it is good to see such a broad range of companies selected.

### 1. Chairperson opens the meeting (Alan Cluett)

- 🌿 Honour to be involved in this Committee.
- 🌿 Outlined the history of the committee first started in 1996.
- 🌿 Chairpersons were nominated from companies. However, due to respective company commitments and workloads the Committee progressed slowly.
- 🌿 Colleen Cluett will Chair meetings in the absence of Alan Cluett.
- 🌿 Chairperson will do some of the additional work outside of the meetings and may require input from the committee in the form of elected working groups.

### 2. Members Code of Conduct (Alan Cluett)

- 🌿 All must refrain from any discussions that could be seen as collusive.

### 3. Attendance and Apologies

Louis Backhoff	Krosa	Tiekie Nuiwenhuis	West End
Latoya Bester	Krosa	Wendy Pienaar	LafargeHolcim
Anthony Bowen	LafargeHolcim	Johan Pretorius	Raumix
Rynard Brits	Rietspruit Crushers	Niraksha Kevel Singh	AfriSam
Alan Cluett	Cluett Consulting	Collin Ramukhubathi	Afrimat
Colleen Cluett	Cluett Consulting	Eugene Riley	AfriSam
Louis de Wet	Afrimat	Letisha van den Berg	Afrimat
Justin Dell	Idwala	Quentin v d Merwe	SPH Kundalila
Trevor McAdam	Drift	Darius von Pletzen	PPC

### Apologies

Marie Swanepoel- OMV Crushers

#### 4. Report back on About Face audits

##### 4.1 Systems Audit (Colleen Cluett)

- 🌿 Results of audit so far vary between operations, highest increase is 3.30% and greatest decrease is 12.84%. Average change is a decrease of 1.18%.
- 🌿 Audit divided into two Sections, namely, Paper Audit and Physical Audit.
- 🌿 Actions that can be taken to improve the paperwork audit score were discussed and are included in the attached .pdf.
- 🌿 ASPASA About Face 2017 covers all aspects required in ISO 14 001:2015. It is likely that ASPASA About Face 2018 will be marginally streamlined to include only value adding requirements.

Letisha van den Berg and Louis de Wet observed the need for greater emphasis on the Physical aspects.

Decision is made to increase, with time, the physical score to 50% of the overall Audit mark.

##### 4.2 Physical Audit (Alan Cluett)

- 🌿 Between 3 and 6 km walked around the EMP approved area during each audit allowing for increased opportunity to observe and discuss physical conditions.
- 🌿 A significant improvement in overall physical conditions at the operations that have been audited has been noted.
- 🌿 Major issues identified in the Physical audits so far are:
  - Performance Monitoring, especially dust fallout, noise and water quality: Only a single service provider so far has been identified as doing monitoring in accordance with the prescribed standards. The requirements of Section 47 of the MPRDA require the provision of accurate and non-misleading information – in this the majority of Member operations may be at risk.
  - SA is a 'water stressed' country, yet there is a lack of water recovery and reuse being practiced at a number of sites. Water charges to operations have been reported at R500 000 per month due to incorrect reporting.
  - Oil separators, in instances are not being maintained correctly or there is deliberate misuse, especially by contractors who are disposing of service oils directly into the units.
  - Alien vegetation removal, at a number of operations, has been delayed due to tight conditions. This is of legal concern as presence of alien vegetation is identified as degradation in terms of S28 NEMA and is an EMP requirement. Also remember section 47 and 93 of the MPRDA!
  - Separating clean and dirty water streams. Increasingly seepage berms have been seen at operation that are reducing the flow of dirty water from, and erosion off of the site. This is a NWA Regulation 704 as well as an EMP requirement. The effectiveness of seepage berms was presented. Images of seepage berms in use at a member operation are included in Addendum.

##### 4.3 Discussion on Audits and related environmental aspects

- 🌿 Members reported that they found the audits useful, informative and value adding.

- Concern was expressed about the increased requirements and scrutiny required by interested parties and neighbours. It was tabled that this is also a reason to ensure environmental monitoring is done correctly and that sample information and reports comply with legal requirement and are accurate.
- A suggestion of ASPASA driving “Focus Points” to cover prioritised issues identified during the Audits was presented, e.g. Focus on Fall-out dust sampling; Focus on Alien vegetation; Focus on Water separation etc. It was agreed that this approach would be helpful as Managers sometimes feel overwhelmed with all numerous requirements.
  - It was agreed that the Auditors would drive a “Focus Point” programme and, where possible, align this with Flash Training.
- The Auditors noted that a number of Auditees feel uncomfortable completing the comments section of the Audit Acknowledgement Form following the Audit.
  - It was agreed that a separate Audit Questionnaire be compiled and sent out to the Auditees by ASPASA directly. This would allow for unbiased feedback on the Audits to ASPASA. Cluett Consulting will develop and circulate a draft questionnaire to Committee Members for input and comment.
- Wendy Pienaar requested the Auditors to comment on the Legal Assessment of the Audit and the findings to-date:
  - Colleen Cluett identified four main issues: water use authorisation; waste management; lack of information on protected species and their identification (especially through insufficient surveys by consultant); and poor legal registers that could not be used as a management tool by operational management.
  - It was recognised that due to the cost of establishing a meaningful, value adding legal register it was unlikely that Members would share their Registers with other Members.
  - It was tabled that registers needed to be practical and where possible address DMR issues.
  - It was agreed that through the offices of ASPASA the Auditors would investigate and present proposals for consideration.
- The Auditors re-emphasized the ‘responsible person’ citing S28 of NEMA, S19 of the NWA as examples of environmental definition, i.e.
  - The Owner of the land (CEO);
  - The Person in Control of the land;
  - The Persons ‘Directly’ of ‘Indirectly’ responsible; and/or,
  - Any negligent person – could include SHE officers or Representatives!In this regard, a document, dated 27 March 2017, relating to the laying of Criminal Charges against the CEO of Enviroserv was circulated.
- Nico Pienaar reported that the ASPASA Management Committee (ManComm) have discussed opportunities to conduct Member visits ‘best practice’ operations.
- Anthony Bowen noted that quarry managers recognise that they are exposed and that a way to partially address this could be through ‘grass roots training’ for individuals below the manager level. This could be in the form of small workshops to share information. The Auditors noted that at some operations Management took the opportunity to expose subordinate HODs, Trainees, Artisans, SHE and Representative to the Audit and related

Auditor training sessions. The About Face audit is a useful training opportunity where environmental and other laws are discussed, with emphasis on employee responsibility. Through increased participation in the Audits, Management could increase subordinate awareness.

Wendy Pienaar agreed and commented that awareness training is currently offered by external suppliers and is not specific enough for the industry. More industry specific awareness training is required.

Cluett Consulting will table some proposals for industry-focussed hands-on training that can be offered across the country through the offices of ASPASA.

Trevor McAdam agreed suggesting that the industry 'conduit' or keep money in the company (ASPASA). He reported that if we do training in the industry, through ASPASA, it allows us to do more and increases the value. This is also indicated through the value of the annual audits. It was a decision from ManComm to increase training. Nico Pienaar requested that the Auditors increase training when they are conducting audits in the respective regions – this will assist in lowering costs associated with training.

- 🌿 The Auditors expressed concern relating to experience at some operations where the Managers were not present during the Audit, leaving the Audit to SHE officers or SHE managers. The need for Managers to be 100% familiar with their Environmental and H&S programmes was emphasized, in particular in the light of penalties discussed earlier.

An example of hands-on Management was tabled at Raumix Willows. Johann Pretorius (Raumix) explained that an Inspector of the Department of Forestry came to the Willows site to investigate alien vegetation and protected species. The site manager, Hentie Jackson, was familiar with all the studies and documentation relating to alien & protected species on the site and was able to present this to the Inspector. The Inspector was impressed and satisfied with the actions of the operation. No physical inspection was deemed necessary. Further, the Inspector then offered assistance with the permitting of gum trees on the site. The Permit was returned to the operation within a couple of weeks.

- 🌿 The Auditors reported that Flash Training will include, where necessary, Scoping documentation to assist operational management in their dealings with Service Providers –including required sampling parameters, reporting requirements and time-frames.

#### 5. Awards for 2016 (Alan Cluett)

Alan Cluett tabled the 2016 About Face Awards to be presented at the IQ/ASPASA AGM in Durban. Certificates of Achievement will also be issued to a number of additional persons.

Awards include:

- 🌿 Top Performer 2016 and Top Performer Runner-up 2016
- 🌿 Top Performer Independent Quarries 2016 and Runner-up.
- 🌿 Top Performer Non-Quarrying 2016
- 🌿 Top Performing Group 2016
- 🌿 Best Physical Conditions 2016
- 🌿 Most Improved Quarry 2016
- 🌿 Environmental Excellence 2016 – Awarded to individuals for Environmental Excellence
- 🌿

6. Training (Alan Cluett)

Largely discussed under Point 4 above.

- Through the ASPASA About Face audits, a need has been identified for training in performance monitoring, especially in light of the consequences of supplying false information.
- Cluett Consulting has tabled a proposal for an ASPASA Flash Training Workshop on the ambient air quality monitoring. A date for the first Workshop will be circulated.
- Nico Pienaar: Requests that the committee list ideas for training. Ideas generated to-date include: Water recovery and reuse opportunities; Waste management and Legal Requirement; Water Licences and the requirements monitoring and reporting
- Cluett Consulting will circulate a proposal that can be added to by committee members and others as applicable.

7. DMR Environmental Assessment Practitioners Workshop, Durban, 9 March 2017

- Alan and Colleen Cluett attended an 'EAP' workshop in KZN (document handed out at the meeting).
- The DMR, DEA, DWS and the newly established DMR Compliance and Enforcement unit presented at the workshop. These are discussed in more detail in the document that was handed out.
- Colleen Cluett emphasised that from the meeting a strong need to identify and report illegal operations or activities to the Department is necessary from all ASPASA Members.
- Collin Ramukhubathi: Susan Malebe was seconded to Pretoria (was the DMR Gauteng Regional Manager) to start the Enforcement and Compliance section. Collin will get the contact details.
- Alan Cluett: The industry needs to meet with the Authority so we can identify their focus aspects. This will present ASPASA with an opportunity to establish for a register that will assist operations in being ready to meet with the authority and having necessary information on hand.

8. General/ Other (Alan Cluett)

- Nico Pienaar: Requests that the committee review the updated environmental policy and submit changes if required
- Nico Pienaar: Requests that issues for the next meeting should be put on the agenda for investigation or approval. Should asphalt, brick plants and RMC plants be included in the next agenda?
- Nico Pienaar: The DMR has identified that there is a lack of control in rubble crushing, has requested that ASPASA takes a lead. Nico to keep members informed.
- Nico Pienaar: UEPG (Brussels) will be in South Africa in May
- Nico Pienaar: The Coal Ash association (SACAA) will be included in ASPASA from the 1<sup>st</sup> of April. The Salt industry has also joined the association along with Dimension Stone. This may force the revising of the ASPASA constitution.

9. Date of the next meeting (Alan Cluett)

It was agreed that initially three Environmental Committee meetings will be held per annum, i.e. February, June/July, October.

A problem was expressed about meetings on Fridays.

**ENVIRONMENTAL : COMMITTEE MINUTES – 27 MARCH 2017**

The next meeting will be held Tuesday 4 July at The ASPASA Offices.  
Meeting is closed at 13h00

Outputs

<u>Output</u>	<u>Responsibility</u>	<u>Date</u>
"2017 focus areas"	<b>All</b> and Cluett Consulting	28 April 2017 Send to: alan@cluett.co.za
Questionnaire for the end of the audit	Cluett Consulting	10 April 2017
Proposal for legal register for the industry, creation of a working group for this	<b>All</b> and Cluett Consulting	28 April 2017
Proposal for hierarchy of training from manager to SHE responsible to general worker. Training for "grass roots"	<b>All</b> with collation by Cluett Consulting	28 April 2017
Proposals for ASPASA Flash Training workshops.	<b>All</b> and Cluett Consulting	28 April 2017: Send to: colleen@cluett.co.za
Review of Environmental Policy	<b>All</b>	10 April 2017 Send comments to Nico@aspasa.co.za
Points for discussion at July 4 Meeting.	<b>All</b>	30 June 2017 Send to Office@aspasa.co.za

**Addendum**

Images of Seepage Berms

