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# ASPASA About Face 2018 Audit Report

## 1. 2018 ASPASA About Face

The ASPASA About Face 2018 Audit programme is based on a revised Audit protocol compliant with the International Standards Organisation ISO 14 001:2015 framework. The framework has been adapted by the Auditors to specifically focus on activities and requirements relating to the South African surface mining industry. As in past years, the 2018 Audit protocol upgrade and audit procedures “raises-the-bar”, thereby, promoting continual improvement at participating operations.

A total of 94 ASPASA About Face Audits were conducted countrywide during 2018.

### 1.1 ASPASA About Face 2018 Performance

**Ninety-three Audits** across twenty-eight Member operations were conducted during 2018. The average score across all auditees fell marginally from 91.54%, achieved in 2017, to 90.60% achieved in 2018, i.e. a fall of 0.94%.

During this period the number of operations achieving Showplace status, i.e. between 95.01% and 100% for the Audit, fell by 19% from 67 operations in 2017 to 53 operations in 2018. Despite the reduced number of operations achieving Showplace status, those achieving Five Fish Eagles increased from 9 to 18 with an overall upward movement noted across all categories. The most significant increase in score by any one operation was an impressive 55.84% - this by new member Saltcor with their Verland operation outside Brandvlei in the Northern Cape!

The top two Group Company scores achieved during the 2018 Audit are separated by 0.04%. The top two Independent Company scores were separated by 0.26%. All ASPASA About Face section “Winners” and “Runners-up” will be announced at the ASPASA Awards Ceremony in 2019.

The overall fall in average scores was noted across the majority of members, in particular those traditionally achieving Showplace and Five Fish Eagle status. A brief analysis of the reasons for this slight decline can be attributed to the Audit philosophy, common to both ASPASA and the Auditors of “raising the bar” from Audit year to Audit Year. The 2018 ASPASA About Face Audit included more stringent requirements relating to the compliance with the latest version of the International Standards Organisation ISO 14 001:2015 EMS. This coupled to increased requirements relating to the Physical component of the Audit that now comprises up to 43% of the total available Audit points, (excluding satellite industries), makes for a more difficult and exacting Audit.



When all is considered, the industry has, through the 2018 Audit results, reaffirmed their commitment to “continued environmental performance improvement” – a universal Environmental Policy goal.

**Table 1** summarises the 2018 About Face achievements under the current Auditors (Cluett Consulting) for the period 2012 through to 2018. (Results prior to this period may be obtained from ASPASA directly, where available).

**Table 1 - Annual Participation and Achievement**

Legend	2012	2014	2016	2017	2018
Participation	0	2	0	3	<b>2</b>
One Eagle	2	4	1	1	<b>3</b>
Two Eagle	6	4	2	1	2
Three Eagles	5	6	11	4	5
Four Eagles	26	12	8	9	10
Five Eagles	24	25	14	9	<b>18</b>
Showplace	15	36	64	67	<b>53</b>
Number of Participants	78	89	100	94	93

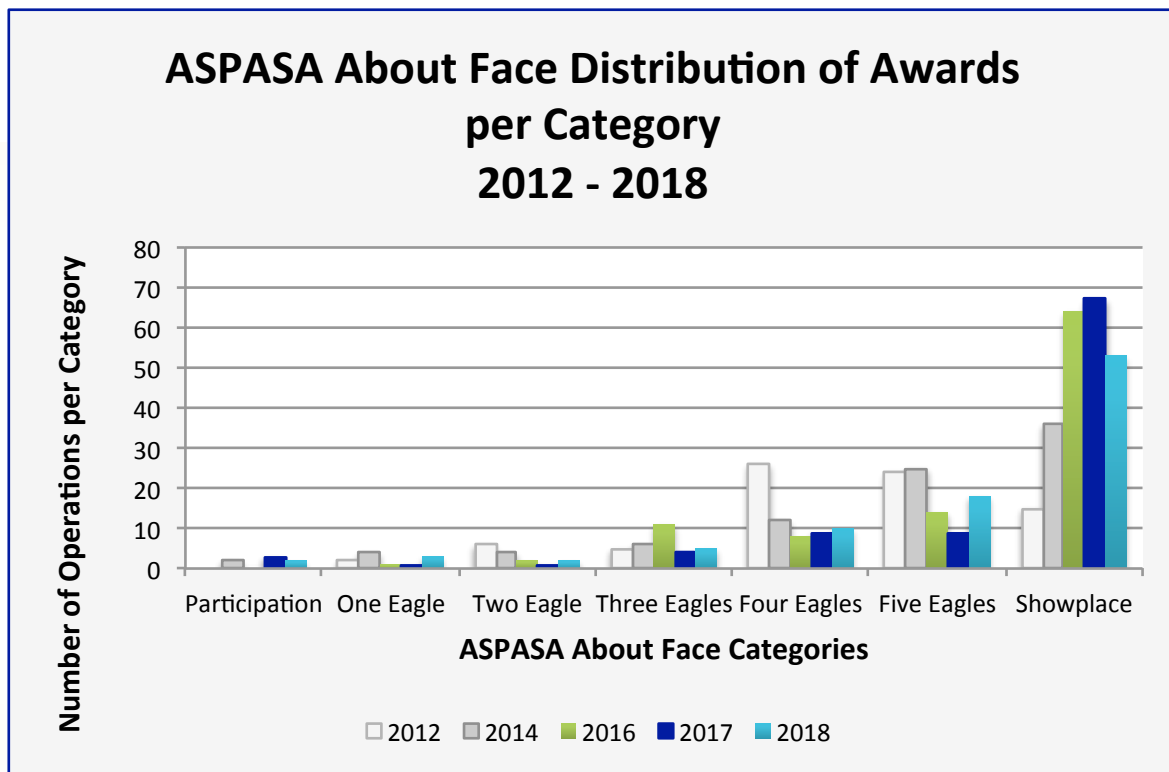
**Table 2** presents the percentages per Award category for the period 2012 to 2018.

**Table 2 - Percentages across award categories per year for the period 2012 to 2018.**

Legend	2012	2014	2016	2017	2018 YTD
Participation	0.00%	2.25%	0.00%	3.19%	2.15%
One Eagle	2.56%	4.49%	1.00%	1.06%	3.23%
Two Eagles	7.69%	4.49%	2.00%	1.06%	2.15%
Three Eagles	6.41%	6.74%	11.00%	4.26%	5.38%
Four Eagles	33.33%	13.48%	8.00%	9.57%	10.75%
Five Eagles	30.77%	28.09%	14.00%	9.57%	19.35%
Showplace	19.23%	40.45%	64.00%	71.28%	56.99%



**Graph 1:** Graphic representation confirms the ‘continual improvement’ achieved year-on-year across the Industry.



## 1.2 Interpretation of results

Graph 1 shows an almost typical ‘bell’ type distribution for Audit scores achieved in 2012. This curve has skewed to the right, year-on-year, as more Member operations improved their Management Systems, legal compliance and site-physical conditions. We believe that this ‘skewing’ of the results towards Showplace status is a reflection of both the commitment of the Member to environmental stewardship as well as a [manifestation as to the success of the About Face programme over the past six years](#).

“Raising-the-bar” annually has been an ASPASA requirement. Industry has risen to the challenge. The upward migration of the participating operations is evidenced in the results.

## 1.3 Comparison between Group and Independent operators

The advantage that Group companies have regarding the standardizing and roll-out of a unitary group management system across their operations; access to group resources including expertise, legal systems, learnings from sister operations and, in instances international partners, is noted by the Auditors.

By contrast, the Independent Operators, having a smaller resource base to draw from. Despite this, the independent operators have, with a few exceptions, achieved remarkable improvements in performance. The top independent operation falls a mere 0.55% lower than the industry top scorer. Overall the 23 Independent operators Audited achieved an average score of 80.95% with Four Showplace Awards.



## 1.4 Environmental training offered during 2018 Audit

Following discussions with ASPASA Members in 2017, it was agreed that the 2018 ASPASA About Face Audit programme would be amended to include a formal training programme. The programme would focus on environmental aspects selected by the Auditors and based on their Audit observations across the industry. The 2018 training session lasted between 4 to 5 hours, depending on the trainee interaction. The training was based on a Powerpoint presentation that was issued to the Auditees in .pdf format on the close of the Audit. Topics presented in the in the training included:

1. "Surface Mining Legislation 101" – The SA Legal System, H&S, Environmental and Mining
2. "The EMP" – The legal status and input process; the importance of compliance.
3. "PCB's" – Their history, uses, dangers and the SA legal requirement.
4. "Bio-remediation of oil contaminated soils" – How to cost-effectively rehabilitate soils on site

In total **638 Member operation employees** attended the on-site training sessions presented by Alan Cluett Pr. Sci. Nat. All attending employees have been issued with ASPASA Training Certificates..

**Table 3** presents a summary of Member participation in the training programme.

**Table 3: Analysis of ASPASA About Face Training Participation**

		Number	Number of Operations	Average / Operation
Total Number or Participants		638		
Delegates per member	NPC	26	2	13.0
	AfriSam	138	14	9.9
	PPC	19	2	9.5
	CBM (Drift & WE Bricks)	28	3	9.3
	Umhlali	9	1	9.0
	LafargeHolcim	98	12	8.2
	Megamix Argeant	8	1	8.0
	Trichardt	8	1	8.0
	BluRock Estcourt	7	1	7.0
	Eskay	7	1	7.0
	Grand Sasso	7	1	7.0
	Kudu	7	1	7.0
	Robberg	7	1	7.0
	Silica Quartz	7	1	7.0
	Supacrush	7	1	7.0
	Afrimat	128	21	6.1
	Midmar	6	1	6.0
	Raumix / SPH-K	84	14	6.0
	Roodekraans Polokwane	6	1	6.0
	Vergenoeg	6	1	6.0
	Idwala	5	1	5.0
	Platistone	4	1	4.0
	Portland	4	1	4.0
	Rietspruit	4	1	4.0
	Dorning	2	1	2.0
	Laubucon	2	1	2.0
Nelspruit Crushers	2	1	2.0	
Saltcor	2	2	1.0	
		638	90	7.1



## 1.5 General Concern noted across the industry

A concern of the Auditors, noted across the industry in both 2017 and 2018, is the general lack of awareness of Management, both Senior and Operational, of the consequences of hosting 'Satellite Industries' within the EMP approved area.

Readymix Plants, Asphalt Plants, Block Plants and explosive contractor depots – amongst others - are common additions to Member operations. These operations typically offer a commercial advantage to their host. However, ASPASA Audits confirm that the majority of these operations have been constructed on the mining site without due regard to the on-site activities approved in the EMP; with out the necessary approvals of the Regional Manager and Principal Inspector; and/or without the necessary impact studies and or licenses. Furthermore these operations are seldom inspected by site Management, or are required to comply with legal and company requirements or procedures of their host, respectively.

As a consequence many operations are vulnerable in terms of Section 47 (1)(b) and (c), and Section 93 of the Mineral and Petroleum Resources Development Act (Act 28 of 2002) where Mining Authorisations can be suspended or terminated. In addition related risks have been identified in terms of Section 2A, Section 3.1 of the Mine Health and Safety Act (Act 29 of 1996), amongst others.

This aspect requires urgent attention across the industry.

## 1.5 Recommended Focus Areas into the future

As out-going About Face Auditors it is difficult to make recommendations for the industry going forward. However, it is our opinion that increased focus on compliance with a growing legislative requirement will require the members to improve their knowledge of environmental legal significantly. **In this regard it is essential that the industry, with the aid of ASPASA, remain at the leading edge of self-governance.** Failure to self-govern environmentally will result in a more constrained and regulated operating environment to the detriment of both the industry and society as a whole. **The ASPASA About Face and ASPASA ISHE programmes have developed into industry best practice worldwide.** Members need to realize this and to increase participation and commitment to these Management Tools and Indicators.

Future focus areas to further improve the programme need to include:

1. Increase Member participation in ASPASA Programmes and Training programmes;
2. Improved training of Member Management and HoDs on Environmental legal responsibilities and Group Environmental Policy commitments;
3. Increased emphasis on environmentally related training including: Environmental Awareness; Environmental Legislation; Environmental Monitoring and Reporting; and, Environmental Best Practice;
4. Improving the implementation of EMS procedures, Work Practices and in-particular Environmental Incident reporting and management to closure;
5. **Legalisation of all 'satellite industries'** located within the approved EMP area, i.e. verification of whether the industry has been included in the approved EMP, and, where not, planning for rectification is initiated;
6. Improved Management and control of on-site satellite industries, i.e. verification of appointments required in terms of the MHS Act (unless exempted); compliance with MHS Act requirements and host operation procedures; compliance with MPRDA etc.
7. Introduce a group wide programme of Checklist Inspections of all Satellite operations located within Approved EMP areas. **In this regard the ASPASA About Face Protocol has already designed a scoring checklist for all types of Satellite industries traditionally located**



on mining sites;

The industry has an excellent crop of competent on-site Managers, support staff and interns. It is essential that the industry continue to invest and develop these industry assets.

It has been an absolute pleasure and privilege to have been the appointed About Face Auditors for the period 2012 through 2018. We do hope we have made a positive contribution to the industry.

ASPASA About Face Auditors:



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## Addendum to Report

### Audit Method

The 2018 About Face Audit was split into three phases

#### Phase 1: Training

Following requests from ASPASA Members, it was agreed that the 2018 on-site audit programme would be adjusted to include an extended Training Session presented by Alan Cluett.

Topics presented during this five-hour Session included:

1. “Legal Update – Surface Mining Legislation 101”;
2. “The EMP” (Environmental Management Programme);
3. “PCBs” (Poly-chlorinated biphenyls); and,
4. “Bio-remediation of oil contaminated soils”.

As an option to training modules 3 and 4, Managers could select a to view an annotated version of Best and Bad practice – a presentation of photographs taken during Audits over the period 2012 to 2018.

In total 638 ASPASA Member employees attended these training sessions – [98 from LafargeHolcim](#). ASPASA have issued Training Certificates to each attending employee.

#### Phase 2: Physical Audit

A site physical Audit was conducted by Alan Cluett Pr. Sci. Nat..

Due to the length of the Training Session the physical audit was limited to a maximum of TWO hours. Areas inspected covered the “environmentally high-risk” areas including:

1. Diesel storage
2. New oil storage;
3. Used oil storage;
4. Waste management sites;
5. Vehicle Wash-bays and oil separators;
6. Transformer stations;
7. Stormwater management; and,
8. Alien vegetation.

The ASPASA About Face Physical Audit comprises 43% of the total Audit score (excluding Satellite Industries).

#### Phase 3: Management System Audit

Colleen Cluett M.Sc. conducted the operational Management System Audit. Colleen has successfully completed the North-West University CEM courses in Environmental Management Systems; Environmental Law; and, Environmental Auditing.

Alan Cluett B.Sc. Hons.; FIQ; LMGSSA, Pr. Sci. Nat. conducted the Training Session and the Physical Audit.



ASPASA About Face Audit is based on the ISO14 001:2015 EMS Framework – the latest edition of ISO 14 001. The out-going About Face Auditors have adapted the ISO 14 001:2015 EMS Framework to specifically to meet the requirements of the South African Surface Mining Industry including aspects relating to Mining Law, Water Law, Mining EMPs and other applicable Environmentally related law.

### **On completion of the Audit**

On completion of the About Face Audit, the operation Management is presented with a CD containing:

1. The site About Face Audit Protocol and preliminary score;
2. A .pdf copy of all the training presented on the day of the Audit;
3. a folder containing a collection of useful files, including copies of applicable SA Legislation, amongst others.

### **Resignation as ASPASA About Face Auditors**

On 7 August 2018 Cluett Consulting gave notice of our intention to resign as About Face Auditors effective 16 December 2018. In our correspondence dated 5 September 2018 summarised our reasons as:

*“To our auditees, clients and friends,*

*By now we are sure you have heard the news that we will not be renewing our contract as the ASPASA About Face auditors for 2019.*

*This is a bitter-sweet time for both of us. We have enjoyed our tenure so very much. It has been a pleasure getting to know all of you and your teams, sharing our knowledge with you and receiving so much in return. We are thankful to ASPASA for this opportunity and for the support we have received from the entire team.*

*However, the time has come for us to refocus our commitment to the industry, to environmental management and to society at large. There is so much we want to do and unfortunately at times our audit schedule has prohibited this.*

*We are looking forward to contributing to the industry in future. Most of all, we are looking forward to our continued interactions with all of you.*

*Yours sincerely,*

*Alan and Colleen”*