



Siyanda Bakgatla Platinum Mine Proprietary Limited

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UNION MINE PROCEDURE

ENVIRONMENTAL TRAINING AND AWARENESS PROCEDURE

VERSION: 01

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REF NO:	SBPM-ENV-PRO-03	DATE OF IMPLEMENTATION:	May 2019
VERSION NO:	01	LAST REVISION DATE:	March 2019

Contents

1	Aim	2
2	Scope	2
3	Definitions.....	2
4	Abbreviations.....	2
5	General.....	3
5.1	Contravention.....	3
5.2	Distribution	3
5.3	Additional Information	3
6	Responsibilities	3
6.1	Induction Training.....	3
6.2	Awareness Training	3
6.3	Competency on the Job Training	3
7	Procedure Implementation	4
7.1	Identification of Training Needs and Training Plans	4
7.2	Training Interventions.....	4
7.3	Environmental Competency Monitoring	5
7.4	Review of Training Programmes.....	5
7.5	Review of Training Programmes.....	6
8	Environmental Courses for Environmental Management Team	6
9	Reference Procedures	10
10	History of Changes.....	10
11	Record Control	10
12	References	10
13	Appendices.....	10

REF NO:	SBPM-ENV-PRO-03	DATE OF IMPLEMENTATION:	May 2019
VERSION NO:	01	LAST REVISION DATE:	March 2019

1 Aim

To describe the provision of training and awareness activities for people working for or on behalf of Siyanda Bakgatla Platinum mining operations who are involved in activities covered under the scope of the EMS in order to ensure that they are properly trained and made aware to carry out their assigned duties in a manner that will not cause deviation from company environmental policy and other requirement to which the organization subscribes to.

2 Scope

This procedure is applicable to all mining operations under Siyanda Bakgatla Platinum mine including contractors and suppliers.

3 Definitions

Term	Defination
Controlled Document	Documents controlled by the Document Controller in an electronic format on the network and in a signed hardcopy format in a flameproof filing cabinet.
Environmental Talk Topic	Monthly environmental awareness topic
Environmental Flash	Environmental notification awareness
IDP	Independent Development plan
Nonconformity	Nonconformity (sub-standard act or condition) is a non-fulfilment of a requirement that can potentially lead to an incident. Is interpreted to include legal non-compliance, deviations from policy, objectives and targets not met.
OSD	Occupational Skills Development
Procedure	Specified way to carry out an activity or a process.
Record	Document stating results achieved or providing evidence of activities performed.

4 Abbreviations

Abbreviation	Explanation
SBPM	Siyanda Bakgatla Platinum Mine
EMS	Environmental Management System
HRD	Human Resource Development
ISO	International Standardization Organization
HoE	Head of Environment
EO	Environmental Officer

REF NO:	SBPM-ENV-PRO-03	DATE OF IMPLEMENTATION:	May 2019
VERSION NO:	01	LAST REVISION DATE:	March 2019

5 General

5.1 Contravention

Breach of this procedure will result in disciplinary action in line with Union Mine Behavioural Policy

5.2 Distribution

This procedure will be distributed to Union Mine Senior HOD Team and will be available on the Union Mine Safety Web

5.3 Additional Information

All department must adhere to this procedure in order to facilitate the communication and training of Environmental information to SBPM community and ensure that every employee is aware of environmental management practices onsite.

6 Responsibilities

This Procedure will be reviewed / revised in line with the requirements of the Union Mine Document control procedure. It is the responsibility of the Environmental Department to ensure that this procedure is reviewed according to the specified requirements.

6.1 Induction Training

It is the responsibility of the Human Resource Development to ensure that any persons working for or on behalf of Siyanda Bakgatla Platinum mining operations shall be inducted before they commence with their work activities. The Environmental department is responsible to ensure that the environmental induction content is updated and is always relevant to our scope of mining.

6.2 Awareness Training

It is the responsibility of the Head of Environment to ensure that monthly environmental talk topics and environmental flash communications are developed and communicated to people working for Siyanda Bakgatla Platinum Mining operations.

6.3 Competency on the Job Training

It is the responsibility of every supervisor to ensure that their people are competent for the task to be performed before appointment in consultation with the HRD department during candidate selection process. Furthermore HRD development identifies training needs in-line with job specification/job description during engagement with the company and schedule the training together with the induction.

REF NO:	SBPM-ENV-PRO-03	DATE OF IMPLEMENTATION:	May 2019
VERSION NO:	01	LAST REVISION DATE:	March 2019

Environmental competency training is arranged and scheduled by the environmental department and the training and education needs for environmental personnel is realised through the IPD process in consultation with the HRD department.

7 Procedure Implementation

7.1 Identification of Training Needs and Training Plans

The Head of Environment in consultation with human resource development and the mine operations management representatives shall identify environmental training needs associated with Siyanda Bakgatla Platinum mining operations environmental risks and its environmental system where appropriate. Environmental training needs shall be fulfilled through categorizing into three (3) training interventions.

- Induction Training;
- On the job competency training.
- Continuous Environment Awareness Training;

7.2 Training Interventions

I. Induction Training

Induction training is conducted upon engagement of employees or any person working on behalf of Siyanda Bakgatla Platinum mining operations to inform them of the importance of conformity with the environmental policy, procedures and with the requirements of the environmental management system. The significance of this training is to inform every person doing work for SBPM about the significant environmental risks and their potential impacts associated with their work, and the environmental benefits of improved personal performance, their roles and responsibilities in achieving conformity with the requirements of the environmental management system, and the potential consequences of departure from specified procedures. According to the Job description the training needs are determined and the HRD department schedules the person(s) for induction related to their activities. Employees receive primary induction training at SBPM training department or their respective operations.

II. On the Job Competency Training

A job specific training is conducted through task procedures and through a formal structured programme. It is based on the significant environmental risks and their associated impacts that were identified during the risk assessment process.

REF NO:	SBPM-ENV-PRO-03	DATE OF IMPLEMENTATION:	May 2019
VERSION NO:	01	LAST REVISION DATE:	March 2019

The training material include on the following:

- Waste sorting, handling and disposal;
- Storage and handling of hazardous materials;
- Incident and substandard acts/ conditions reporting;
- Emergency Preparedness and Response.

The structured training programme is not linked to a specific role or task, but rather to the work activities which has the potential to adversely impact the environment and may be part of the general induction or scheduled separately to be trained by an accredited external training provider. Examples of these work activities maybe waste management, handling of hazardous substances, biodiversity management and water management activities for example.

III. Continuous Environmental Awareness Training

Continuous environmental awareness training is conducted through monthly environmental talk topics to remind employees of the significant environmental aspects associated with their work which might have a detrimental impact on the environment or lead to non-conformity with the environmental management system. Environmental flash communication reports are also used for potential incidents which may lead to non-conformity to the environmental management system and environmental incidents recalls. Environmental monthly topics shall be discussed on safety meetings and placed on the notice boards.

7.3 Environmental Competency Monitoring

Environmental awareness and competency shall be assessed during inspections, audits and ad-hoc walkabout. This will assist in determining the competence of employees regarding the activities performed and associated environmental issues. The aim is to identify the effectiveness of training system and the competence in performing the job. All of these mechanisms shall be used to continuously evaluate the effectiveness of the training system and to identify new training needs and to update the training programme.

7.4 Review of Training Programmes

The training programme shall be reviewed when required as per results of the competency assessment in 7.3 above or when there is a need to update the training content as a result of compliance obligations changes or change management process whereby the content of the training material and the delivery method of training programme shall be reviewed accordingly.

REF NO:	SBPM-ENV-PRO-03	DATE OF IMPLEMENTATION:	May 2019
VERSION NO:	01	LAST REVISION DATE:	March 2019

7.5 Review of Training Programmes

Training records shall be kept by the responsible personnel, Induction records shall be stored by HRD according to their procedure, Proof of communicating the environmental talk topics and environmental flash communication shall be kept by the responsible environmental personnel and finally the on the job competency training shall be kept by the HRD department according to their procedure. Task procedure training records shall be kept in the respectable section and/or the environmental department (e.g. MSDS records talk). The format of the training records may be electronic and/or paper records.

8 Environmental Courses for Environmental Management Team

	Senior Environmental Manager	Environmental Manager Mining & Process	Environmental Coordinator/Specialist (Air/Water)	Environmental Coordinator Trainee	Environmental Assistant
Environmental Related Courses					
Mandatory					
Environmental Degree/Diploma	X	X	X	X	
Environmental Law (Short course)	X	X	X	X	X
Environmental management systems (ISO 14001) (Short course)	X	X	X	X	X
Environmental Auditing (short course)	X	X	X	X	X
Safety Risk Management A3	X	X	X		
Safety Risk Management A2				X	X
Non-mandatory					
Rehabilitation					
Waste Management					
Environmental Risk/Impact Assessment					
Water quality management			X		
Air quality management			X		
Land management					

REF NO:	SBPM-ENV-PRO-03	DATE OF IMPLEMENTATION:	May 2019
VERSION NO:	01	LAST REVISION DATE:	March 2019

9. ENVIRONMENTAL TRAINING AND DEVELOPMENT NEEDS & MATRIX

OCCUPATION	RESPONSIBILITY	REQUIRED KNOWLEDGE AND OUTPUT	Intervention required	Interval
Senior Management (HOD's)	Managing EMS	Setting environmental policy	Legal Compliance and Significant Aspects Review/ environmental strategy communication	Annually
		Understanding (EMS) ISO14001, directing resources and evaluation of performance	Management Reviews	Annually
		Knowledge of organisation's significant environmental impacts and risks	Environmental Reports on performance, specific environmental meetings	Monthly
		Environmental Data & Performance reporting	Status EMS system actions reports	Weekly
	SHE database status and reports		Monthly	
	Managing Legal Requirements	legal compliance as licence to operate and influence, reputation management and requirement of ISO14001	legal compliance and evaluation reports	Annual
			legal updates and compliance status	Monthly
Middle management functional line managers (section managers and coordinators)	Implementing and management of EMS	Understanding of ISO 14001 and environmental performance	Environmental Induction & meetings, access to ISO14001 standard	Annually or as per schedule
		Knowledge of department's significant environmental impacts and risks	Aspect and impacts identification and reviews	Annually
			Environmental inspections discussion	Monthly
		Setting and management of departmental objectives and targets and legal compliance	Environmental Toolbox topics, Objectives & Targets & calendar events	Monthly
			EMS training and updating of EMPs	Monthly
			Review of EMS and Internal Audits	Annually
			Access to legal register	Once off

REF NO:	SBPM-ENV-PRO-03	DATE OF IMPLEMENTATION:	May 2019
VERSION NO:	01	LAST REVISION DATE:	March 2019

Supervisors	Managing daily actions and adherence to procedure to prevent/ control impacts	Awareness on Environmental management, policy and ISO14001 and targets	Environmental Induction, communication of policy and procedures	Annually
		Knowledge of department environmental impacts and Objectives and Targets	Training on significant environmental aspects, procedures and consequence of deviations from legal compliance	Annually then continuous follow up
			Communication of Objectives and Targets performance and inspection reports	Monthly
		Pollution prevention, corrective actions and incident reporting & emergency response	Job specific training	Annually
			Environmental inspections & emergency response drills	Monthly or as scheduled
			Environmental Toolbox topics & calendar events	Monthly
		All other employees	Controlling personal actions to prevent impacts	awareness of ISO 14001, EMS and environmental policy
Environmental requirements of work activities and consequences of personal action and performance	Job specific training and significant aspects task procedures			Annually
Pollution prevention, corrective actions and incident reporting & emergency response	Environmental Toolbox topics & calendar events and policy communication			Monthly
Contractors	Managing activities to prevent/ control impacts	Awareness of ISO 14001, EMS and environmental policy of Central Services and Mines	Environmental Induction, communication of policy and procedures	Annually

REF NO:	SBPM-ENV-PRO-03	DATE OF IMPLEMENTATION:	May 2019
VERSION NO:	01	LAST REVISION DATE:	March 2019

		Environmental requirements of work activities and consequences of personal action and performance	Job specific training and significant aspects task procedures	Annually
		Pollution prevention, corrective actions and incident reporting & emergency response	Environmental Toolbox topics & calendar events and policy communication	Monthly
Environmental Personnel	Coordinating and maintaining EMS and environmental performance	ISO14001 standard requirements, implementation and auditing	Career Development Plans (CDPs)	Annually
		Mandatory environmental degree and courses	EMS, Legal compliance courses and workshops Review of performance	As per CDP/ KPIs

REF NO:	SBPM-ENV-PRO-03	DATE OF IMPLEMENTATION:	May 2019
VERSION NO:	01	LAST REVISION DATE:	March 2019

9 Reference Procedures

- SBPM-ENV-PRO-01 : Environmental Management System Procedure
- SBPM-ENV-PRO-02 : Environmental Legal Obligations
- SBPM-ENV-PRO-04 : Environmental Management Training and Awareness Procedure

10 History of Changes

Reason for Change - Index	
A. As a result of incidents	B. As a result of audit findings
C. New/changes in governance documents	D. Changes in legislation
E. Changes in technology	F. Changes in machinery/equipment
G. Results of risk assessments	H. Change in training requirements
I. New document format	J. Change due to spelling or grammatical error
K. To integrate a special instruction into the document control system	

Date of change	Revised Item (Paragraph number)	Changes Made	Reason Code	Name of reviewer

11 Record Control

Identification	Reference number	Responsible for filing and Maintenance	Location of storage area	Retention period	Method of disposal
Risk Register	TBC	Head of Environment	Network Drive	LoM	System Deletion
Legal Register	TBC	Head of Environment	Network Drive	LoM	System Deletion

12 References

ISO 14001:2015 Environmental Management System
 Environmental Risk Management Procedure
 Legal Requirements

13 Appendices

None

END OF PROCEDURE