

Environmental Management System

Integrated Pollution Control

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Purpose

The Clicks Group aims to develop, implement and maintain an integrated pollution system that will conform to sustainable practices and will incorporate all aspects of The Clicks Group that may have a significant impact on the environment.

To take a Holistic and Integrated Planning approach towards all pollution aspects on in the group that incorporates technology, system procedures and human resources elements of The Clicks Group.

Scope

Integrated Pollution Control shall identify, evaluate, monitor and prevent pollution with regards to:

- Land
- Soil
- Noise
- Water
- Waste
- Air Pollution

This procedure applies to all management, employees, sub-contractors and business partners associated with The Clicks group as well as to all operational activities that may contribute to potential pollution or degradation of the environment.

Definitions

- **“NEMA”** National Environmental Management Act
- **“Pollution”** is defined in Section 1 of **NEMA** as:

Any change in the environment caused by:

- Substances;
- Radioactive or other waves; or
- Noise, odours, dust or heat;

Emitted from any activity, including the storage or treatment of waste or substances, construction and the provision of services, whether engaged in by any person or an organ of state, where the change has an adverse effect on human health or well-being or on the composition, resilience and productivity of natural or managed ecosystems, or on materials useful to people, or will have such an effect in the future;

- **Diffuse pollutants** – pollutants that cannot be traced to specific source e.g. surface run-off can contain a number of different contaminants from a number of different sources.
- **Source pollutants** – pollutants that can be traced back to a specific source e.g. oil leakage from vehicles or equipment
- **Leachate** – water that becomes contaminated by infiltrating landfill sites and moving down to the groundwater

References

- Environmental Management Plan Document 1.1
- Environmental Aspects and Impact Document 3.1
- Legal Impacts Document 3.2
- Environmental Objectives and Targets Document 3.3
- Environmental Management Structures and Responsibilities Management 4.1
- Purchasing and Procurement Document 5.1.1
- Air Management 5.1.2.2
- Hazardous Material, Chemical and Pesticides Management 5.1.2.5
- Waste Management 5.1.2.6
- Design, Construction and Refurbishment Document 5.1.3
- Transport and Maintenance Document 5.1.4
- Emergency Preparedness and Response Document 5.2
- Records Control Document 5.3
- Mitigation Document 5.4
- Monitoring and Measurement Document 6.1
- Compliance Evaluation Document 6.2

Responsibilities

Group HR Director

The Group HR Director is ultimately responsible for all pollution management and remediation at The Clicks group

Group Services and Facilities Manager

The allocated department is responsible for all maintenance activities that may lead to environmental pollution and shall:

- Liaise with the Sustainability Facilitator at all times
- Ensure the correct type of information with regards to pollution management pertaining to maintenance activities is provided to all employees and those on site.
- Ensure that all agreed actions for pollution management are implemented as soon as practicable.
- To provide appropriate information to all contractors, sub-contractors or those conducting and additional work that can have an impact on pollution management or quality. This information must be current and include current action and activities undertaken by the business.
- Ensure that the relevant operational procedures is updated, if necessary, and implemented.
- Promote positive environmental values through the Group.
- Report any problems, non-conformances and/or incidents of any activities to the mitigations register.

Sustainability Facilitator

The Sustainability Facilitator is responsible for overseeing this procedure, and shall:

- Report to the Audit and Risk Committee and keep them apprised on all matters pertaining to this procedure
- Formalise communications to reflect current operational activities and actions and ensure that this policy is implemented and managed accordingly.
- Ensure that this procedure, instructions and guidance are regularly reviewed and amended as necessary
- Actively promote a positive environmental culture throughout all areas of responsibility

Environmental Committee

The Environmental Committee is responsible for the managing, monitoring and review of this procedure along with the Sustainability Facilitator and shall;

- Ensure that this procedure is applied and understood by all those directly responsible
- Review this policy on an annual basis along with the Sustainability Facilitator and make sure its current at all times as indicated by the individual head of departments
- Report, control, managed or suspends any aspect that could be non-compliant or contradictory against this policy
- Engage in internal and external communication actions and activities, to promote, assist and educate.

All Employees'

All employees are required to:

- Interact and show commitment to communicational activities undertaken by the business and support, educate and manage where possible.
- Co-operate with the Group in complying with duties and requirements imposed by relevant statutory provisions and Company Procedures as indicated in this procedure
- Understand the Group's Environmental Policy
- Not interfere with, or misuse anything provided in the interests of environmental protection
- Report all environmental incidents to a Manager / Environmental Committee member

Integrated Pollution Control Policy

The Clicks Group is committed to ensuring a better environment for its community – both for the present and for the future. It will achieve this through awareness creation; by adopting the principle of prevention rather than cure and by regulating its activities with a view towards minimising and avoiding pollution. In giving effect to this policy, The Clicks Group shall ensure compliance with legal regulatory requirements, co-operation with relevant authorities and agencies, putting the environmental first and integrating good environmental practices into working methods.

Procedures

General

In order to give effect to the procedure the following is implemented at The Clicks Group:

- Identify and prioritise, using a risk based approach, the source of pollutants.
- Develop a management plan which includes capacity and technical considerations outlining the strategy, areas of responsibility to set objectives and targets to minimise pollution at source and promote hierarchy of pollution management practices, namely prevent pollution at source as a priority and if pollution cannot be prevented, remediation/rehabilitation must follow as a secondary priority.
- Regulate and monitor waste production, enforce waste control measure, and coordinate administration of integrated pollution and waste management through the appointed environmental committee.

- Ensure the protection and proactive management of human health problems related to the environment in all forms of operational activities.
- Setup information systems on chemical hazards and toxic waste releases and ensure the introduction of a system to track the transport of hazardous materials.
- Prevent, reduce and manage pollution of any part of the environment due to all forms of human activity, and in particular form hazardous substance.
- Implement educational and awareness programs for employees/contractors/business partners whose activities might negatively affect the environment on pollution control methods.

New developments

- Incorporate environmental health related inputs regarding new development such as refurbishments and in any other instances where an Environmental Impact Assessment is not a statutory requirement.
- Evaluate and give input regarding environmental impact studies as an affected party when Environmental Impact Assessments are a statutory requirement.

Operational Control

This applies to specific operational control in place to prevent or mitigate environmental pollution at The Clicks Group.

Water Pollution

The procedure on water pollution management covers inland waters, both surface and groundwater, as well as estuarine and marine waters. Issues which will be considered in relation to policy implementation include:

- Land uses affecting water quality
- Water quality requirements as specified by local/national legislation
- Point sources of pollution, e.g.:
 - Sewage treatment works and
 - Internal potable water systems for legionnaire's management
 - Management of storm water from car parks and maintenance operations

Diffuse sources of pollution, e.g.:

- Polluted base flow origination from industrial areas (including marine outfalls)
- Leachate from waste disposal sites
- Polluted flow originating from the use of chemicals and pesticides
- Leakage from sewage reticulation systems and sewage works

With regard to integration of water pollution control, the following issues will be considered:

- Use of herbicides, pesticides and poisons, and their contribution to the contamination of storm water run-off
- Petroleum contamination resulting from accidental spills and faulty equipment
- Atmospheric deposition on land and the indirect impact on surface and groundwater that may include wind-blown dust and solids from tailing deposits and their impact on water quality

Air pollution

The procedure specifically relating to air quality management consider pollution on a local scale. Atmospheric pollution, malodour generation and control, as well as indoor air pollution will be covered.

Issues which will be considered in relation to policy implementation are:

- Smoke (particulate) arising from coal and fuel burning (including particulate from power generation)
- Vehicle emissions

- Emission from industrial activities
- Dust arising from mining and industrial activities
- Various sources of greenhouse gases
- Waste disposal sites
- Incinerator emissions
- Acid rain
- Noise

With regard to integration, the following issues will be considered:

- The regulation of air pollution by the Department of Environmental Affairs and Tourism, the provinces and municipalities
- The pollution of water used for scrubbing air
- Air pollution arising from the disposal of solid waste

Noise

Those aspects of the procedure relating to noise management will address both internal and external noises that are considered a hazard or nuisance, this procedure will also overlap with health and safety standards.

Issues which will be considered in relation to policy implementation are:

- Road traffic
- Neighbouring and domestic noise
- Industrial noise

Waste

Those aspects of the procedure relating to waste management will address purchasing of commodities, non-hazardous, hazardous waste that includes medical, agricultural such as pesticides, as well as litter. Waste is considered to be a source of pollution and the procedure will address the management of the entire waste handling process, from generation to final disposal.

Issues which will be considered in relation to procedure implementation are:

Waste avoidance, minimisation and prevention:

- Recycling and reuse
- Treatment and handling
- Storage and final disposal

Land pollution

The procedure on land pollution considers urban, industrial, mining, rural and agricultural land. The loss of arable land through compaction or alien invasion is not discussed in this document. Soil erosion per se is also not covered, except under the water medium, where it is regarded as a pollutant (see Section 4.2.1).

Issues and land pollution sources, which will be considered in relation to procedure implementation, are:

- Injudicious of fertilizers and agricultural chemicals
- Irrigation with sewage sludge
- Over-irrigation
- The impact of agricultural chemicals such as pesticides, herbicides and fertilizers on surface land quality
- Petrochemicals impact on soil properties

With regard to integration, the following issues will be considered:

- Soil erosion
- Land pollution from liquid effluent disposal via irrigation

- The impacts of industrial activities or infrastructure on surface and ground water quality, in terms of related effects on land or soil
- The impact of residential development
- Land application of sewage sludge
- The impact of waste and hazardous waste disposal sites on soil.

Emergency Control Procedures

In the case of an emergency with regards to any pollution the following steps must be taken:

- Identify the specific contaminant that causes pollution
- Notify the party responsible for emergency response
- Prevent the spreading of the contaminant through storm water drainage or any other channels by placement of barriers or absorbents
- Monitor the situation for reporting (informing the hazmat team of specifics) and record keeping purposes
- Investigate the cause and significance of the pollution incident after the area has been declared safe by the HAZMAT team
- Report to top management in the next Environmental meeting to discuss mitigation measures
- Implement and assess effectiveness of mitigation measures
- Monitor the cause of emergence intensively for at least 3 weeks after occurrence
- Record all incidents in the environmental incident register

Take note that should a severe/major incident occur follow section in NEMA: Control of Emergency Incidents.

Records

Legal Register 3.2.1

Mitigation Register 5.4.1

Incident Register 6.1.4