

Black Mountain Mining

BMM-HSE-ENV-SOP-0027 Environmental Aspects Procedure

VZI Doc #	SBU Doc #	Document Type	Review Status
BMM-HSE-ENV-SOP-0026	BMM-HSE-ENV-SOP-0027	Standard Operating Procedure	Approved
Version	Confidentiality Level	Audit Standard	HOD
11.0	Internal (C3)	ISO 14001	Catharina Kotze

Effective Date	Review Date	Review Cycle	Next Review Date
2-16-2019	1-9-2025	2 Years	1-9-2027

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1. POLICY STATEMENT

BMC's Standards (STD's) shall be written in a clear concise manner, communicated to all employees and applied accordingly. The purpose of this document is to:

- To describe how to identify the environmental aspects of activities, products and/or services that the company can control and that have significant environmental impact.
- To have a risk management and opportunities baseline from which strategic objectives in terms of the Environmental Management System can be made to effectively manage environmental issues.
- To ensure compliance to Vedanta's Management Standards pertaining to risk management

2. SCOPE

This system standard assesses the impact potential of current activities, products and/or services and also takes into account the possibility of previous practices causing impacts. This will be for activities, products and services directly under control of BMC or can be influenced by BMC. This will be done from a life cycle perspective.

Impact on the environment comprises pollution and the use of resources, legal & regulatory requirements, material damage, reputation / social / community (RSC) impacts. Assessment of the potential impacts will also identify positive impacts and/or opportunities.

Environmental risk and opportunities can change considerably under different operating conditions and circumstances. Therefore, to provide control at all times this system procedure considers the significance of environmental aspects under:

- Normal operating conditions,
- Abnormal situations involving some change from normal conditions (start-up / close off)
- Potential emergency situations.
- Change in the operation due to new equipment, activities, products or services

This standard produces a list of the high risks/opportunities to manage and indicate significant aspects with a numerical significance rating to indicate their relative importance to the environment and the organization.

The significant aspects identified are used to update operating procedures and to establish objectives and targets for environmental improvement during annual review.

3. DEFINITIONS AND ABBREVIATIONS.

AAOs:	Projects or Actions to achieve objectives formerly referred to as environmental management plans (EMP) in the system
BMC:	Black Mountain Complex, which consist of Deeps mine, Swartberg Mine, Gamsberg Mine with all associated supporting services and infrastructure.
Environment:	Surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation.

- Environmental Aspect:** Element of an organization's activities, products or services that can interact with the environment.
- EIA:** Environmental Impact Assessment. A document consisting of various specialist reports to address the environmental impacts and potential impacts of a project.
- EMPR:** Environmental Management report. A document drafted to address the impacts as identified by the EIA process.
- Environmental Impact:** Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's activities, products or services.
- Risk:** Risk is defined as the uncertainty or expectation of an event's outcome that could impact on business objectives.
- Risk Management:** Risk Management is a management system designed to help line managers identify, understand and manage risks, for the purpose of improving decisions and ensuring business objectives are achieved.
- Significant environmental aspect:** An environmental aspect that has or can have significant environmental impact on the environment.

4. ASPECT IDENTIFICATION FLOW

4.1 Establish Scope

Establish the scope of the operation.

The scope used to identify the significant aspects is the BMC SHE Scope as depicted in the EMS manual (BMC-HSE-ENV-SOP-0034).

Establish the responsible persons that will be involved in the process.

Establish area of operation for section.

Establish scope of each section activities within the BMC operation by means of a life cycle flow-diagram,

Apply BMC reference number for mine wide life cycle, assign section reference numbers, and assign reference numbers to life cycle steps.

4.2 Determine Inputs and Outputs of Life Cycle Steps

Consider Life Cycle Steps that could interact with the environment

Consider INPUTS and OUTPUTS for each step and list on input-output grid as shown above.

4.3 Evaluate Risks and Opportunities

Determine Aspects from input-output grid for each step of the process flow.

Determine situations under normal / abnormal / emergency condition or Change in the operation

Determine receiving environment (air, water, around water, soil, biodiversity)

Determine current controls for each step in life cycle.

Evaluate significance of each identified aspect - actual and potential positive and negative impact / resource.

Evaluate past or current incidents of section

Evaluate if Compliance Obligations are applicable and indicate the risk ratio as according to the Risk Assessment Heat Map (BMC-HSE-ENV-SS-0047)

Evaluate if reputation/social/community impact is applicable and determine the risk rating.

4.4 Compiling Risk Profile

Rank aspects with high risk or opportunity ratings.

Establish root cause for high risk/opportunities environmental impacts

Compile management actions to reduce risks (AAO's, procedure review, managerial instruction, additional physical controls).

Identified Significant Aspects per section will be aggregated for a BMC significant risk profile. In addition, these risks will be pulled through into the BMC strategic risk profile as defined in the document RSK 09 Risk Matrix.

4.5 Managing to Reduce Risk or Enhance Opportunities

Update standards and objectives as required.

Each aspect that attains a high significance rating and greater with management structures in place is noted as a significant aspect and as such warrants careful attention.

Once significant environmental aspects, risk and opportunities and compliance obligations is determined an objective and AAO's will be developed. The objective/AAOs will be to eliminate, reduce, substitute, engineer or administrative control the risk.

4.6 Register of Significant Aspects

All new projects, equipment, or process changes require an eHIRA and changes to the aspects register.

As part of the Management of Change process, an Aspect determination will be triggered.

All aspects is contained in the EMS system where the significant aspects is ranked according to risk ranking.

5. RESPONSIBILITY.

- The environmental officer shall implement and maintain this Document,
- Department Heads shall ensure that this standard is applied with due diligence.
- Should additional precautions, due to special circumstances unique to that Department/Section, over-and-above the requirements of the procedure be necessary, then the Department Head shall ensure that, in consultation with the relevant specialists, such requirements are specified in writing, conveyed over to the end users and recorded as such.

6. REVISION HISTORY

Revision 7 of SSD-ENV –STD-027 Environmental Aspects includes:

- Update procedure for alignment with SILO system.

Revision 8 of SSD –ENV-STD-027 Environmental Aspects includes:

- Update Purpose and definition to include Gamsberg EIA and Specialist reports into the SILO based aspect register.

Revision 9 of SSD –ENV-STD-027 Environmental Aspects dated January 2018 includes:

- Update document to align with requirements of the ISO 14001:2015 standard
- Remove silo reference

Revision 10 of SSD –ENV-STD-027 Environmental Aspects dated 16 February 2021 includes:

- Review document to align with requirements of the ISO 14001:2015 standard
- Document reference from SSD-ENV-STD to SSD-ENV-SOP
- Update document signature field and Implementation date
- Include Section Associate documents

Revision 11 of BMC-HSE-ENV-SOP-0027: Environmental Aspects dated 09 January 2025

- Update naming conventions to the current document management standard.

7. ASSOCIATED DOCUMENTS

BMC-HSE-ENV-SS-0047 - Risk Assessment Heat Map

BMC-HSE -ENV-SOP-0034 - EMS manual

8. REVIEW AND APPROVAL

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This document was approved (in sequence) by the individuals above using electronic approval in our Document Control System.

Final approval status: **Approved**

Approvals were done electronically.