

CITY OF CAPE TOWN ENVIRONMENTAL MANAGEMENT PROGRAMME

SPECIFICATION: ENVIRONMENTAL MANAGEMENT

GUIDELINE DOCUMENT FOR THE ENVIRONMENTAL OFFICER AND THE ENGINEER'S REPRESENTATIVE

Revision 2007



CITY OF CAPE TOWN | ISIXEKO SASEKAPA | STAD KAAPSTAD

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GUIDELINE DOCUMENT FOR THE ENVIRONMENTAL OFFICER AND THE ENGINEER'S REPRESENTATIVE

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ABBREVIATIONS

The following abbreviations occur in this document:

- EO - Environmental Officer
- ER - Engineers Representative
- ECO – Environmental Control Officer
- ESO – Environmental Site Officer
- EMP - Environmental Management Programme

INTRODUCTION

The requirement that an Environmental Management Programme (EMP) be developed and enforced for this project is indicative of the Council's support for best construction practice, which includes ensuring that environmental damage during construction is minimised.

In terms of Clause 2.7 of the General Conditions of Contract 2004, the Engineer has the authority to appoint a representative to act as the Environmental Officer (EO) for the Contract. The EO shall be responsible for monitoring compliance with the EMP. Except in an emergency situation, where instructions may be given directly to the Contractor, **all instructions given by the EO shall go through the Engineer's Representative, who will then convey these to the Contractor.**

The purpose of this document is therefore to:

- Detail the role of the Environmental Officer (EO) and the Engineer's Representative (ER) with respect to the implementation of the EMPs;
- Provide additional information and checklists.

The ER and/or the EO must read through and understand the contents of the Guideline Document for the Contractor as well as the EMP specifications in the Contract Document to ensure that the requirements of the EMP are met. Depending on the nature of the contract the following variations in the organisational structure are possible:

- The ER may work together with an EO; or
- There may be an ER only (for construction projects with low potential for causing significant environmental impacts). In this case the ER has responsibility for the EO's functions; or
- There may be an independently appointed Environmental Control Officer (ECO) who will fulfil essentially the same functions as the EO. The ECO may work with just the ER (if there is no EO) or may work with both the ER and EO. The appointment of an ECO is usually a condition of an Environmental Authorisation from the Department of Environmental Affairs & Development Planning (provincial) or Department of Environmental Affairs & Tourism (national).

ISSUES RELATING TO THE IMPLEMENTATION OF THE EMP

Organisational Structure

The organisational structure identifies and defines the responsibilities and authority of the various persons and organisations involved in the project. All instructions and official communications regarding environmental matters shall follow the organisational structure shown in Figure 1.

From this it can be seen that the Environmental Official, to which the ER and/or EO shall interact with, shall be the Responsible City of Cape Town Environmental Official. The EMP will be an agenda item of the monthly site meetings, and the Responsible City of Cape Town Environmental Official may attend these meetings in order to provide input with respect to compliance with the EMP. In some instances, an Environmental Consultant may be appointed to provide this input. If at any time the ER and/or EO is uncertain in any way with respect to an environmental issue or any specification in the EMP, he/she shall consult with the Responsible City of Cape Town Environmental Official.

Responsibilities and Functions of the Environmental Officer (EO)¹

The EO will be responsible for monitoring, reviewing and verifying compliance with the EMP by the Contractor. The EO's duties in this regard will include the following:

- assisting the ER in ensuring necessary environmental authorizations and permits have been obtained;
- monitoring and verifying that the EMP is adhered to at all times and taking action if the specifications are not followed;
- monitoring and verifying that environmental impacts are kept to a minimum;
- reviewing and approving construction method statements together with the ER;
- assisting the Contractor in finding environmentally responsible solutions to problems;
- giving a report back on the environmental issues at the monthly site meetings and other meetings that may be called regarding environmental matters;
- keeping records of all activities / incidents concerning the environment on Site in the Site Diary;
- inspecting the Site and surrounding areas regularly with regard to compliance with the EMP;
- keeping a register of complaints in the Site Office and recording and dealing with any community comments or issues;
- monitoring the undertaking by the Contractor of environmental awareness training for all new personnel coming onto site;
- advising on the removal of person(s) and/or equipment not complying with the specifications (done via the ER);
- recommending the issuing of fines for transgressions of site rules;
- ensuring that activities on site comply with legislation of relevance to the environment;
- recommending the issuing of penalties (via the ER) for contraventions of the EMP (e.g. damage to "no go" areas);
- completing start-up, weekly, monthly and site closure checklists (see Annexure C);
- keeping a photographic record of progress on Site from an environmental perspective; and

¹ If an independent ECO is appointed, his/her responsibilities and functions will be, in most cases, the same as those of the EO. However, the ECO's scope of work may vary from project to project.

- undertaking a continual internal review of the EMP and submitting a report to the Employer and the Responsible City of Cape Town Environmental Official at the end of the project.

Responsibilities and Functions of the Engineer's Representative (when there is an EO)

Although the EO will be responsible for monitoring, reviewing and verifying compliance with the EMP by the Contractor, the ER will also ensure compliance and will assist the EO where necessary. The ER's duties in this regard will include the following:

- ensuring necessary environmental authorizations and permits have been obtained;
- monitoring and verifying that the EMP is adhered to at all times and taking action if the specifications are not followed;
- monitoring and verifying that environmental impacts are kept to a minimum;
- reviewing and approving construction method statements with input from the EO (and/or ECO) where necessary;
- assisting the Contractor in finding environmentally responsible solutions to problems with input from the EO (and/or ECO) where necessary;
- ordering the removal of person(s) and/or equipment not complying with the specifications;
- issuing of fines for transgressions of site rules;
- the issuing of penalties for contraventions of the EMP (e.g. damage to "no go" areas);
- providing input into the EO's (and/or ECO's) ongoing internal review of the EMP, which is submitted as a report to the Employer and the Responsible City of Cape Town Environmental Official at the end of the project.

Responsibilities and Functions of the Engineer's Representative (when there is no EO or ECO)

The ER will be responsible for monitoring, reviewing and verifying compliance with the EMP by the Contractor. The ER's duties in this regard will include the following:

- ensuring necessary environmental authorizations and permits have been obtained;
- monitoring and verifying that the EMP is adhered to at all times and taking action if the specifications are not followed;
- monitoring and verifying that environmental impacts are kept to a minimum;
- reviewing and approving construction method statements with input from the Responsible City of Cape Town Environmental Official where necessary;
- assisting the Contractor in finding environmentally responsible solutions to problems with input from the Responsible City of Cape Town Environmental Official where necessary;
- giving a report back on the environmental issues at the monthly site meetings and other meetings that may be called regarding environmental matters;

- keeping records of all activities / incidents concerning the environment on Site in the Site Diary;
- inspecting the Site and surrounding areas regularly with regard to compliance with the EMP;
- keeping a register of complaints in the Site Office and recording and dealing with any community comments or issues;
- monitoring the undertaking by the Contractor of environment awareness training for all new personnel coming onto site;
- ensuring that activities on site comply with legislation of relevance to the environment;
- ordering the removal of, or issuing spot fines for, person(s) and/or equipment not complying with the specifications;
- issuing of penalties for contraventions of the EMP (e.g. damage to “no go” areas);
- completing start-up, weekly, monthly and site closure checklists (see Annexure C);
- keeping a photographic record of progress on Site from an environmental perspective; and
- undertaking a continual internal review of the EMP and submitting a report to the Employer and the Responsible City of Cape Town Environmental Official at the end of the project.

Record of activities, non-compliance and corrective action

The EO/ER will keep a record of all activities relating to environmental matters on site, including: meetings attended, method statements received and approved, issues arising on site, cases of non-compliance with the EMP together with corrective action taken and penalties issued. This information will be recorded in an appropriate manner by the EO/ER in a site diary, registers, issues/warning book, etc. In addition, the EO/ER is to undertake weekly and monthly checks on Site in order to ensure compliance with the EMP. At the end of each month, a monthly compliance certificate needs to be completed and submitted to the Engineer (the weekly and month end checklists need to be attached to the compliance certificate). Annexure C contains these checklists for the EO/ER in order to assist in the compliance monitoring of the EMP.

Photographic record

The EO/ER will keep a photographic record of progress on site and an ad hoc record of all incidents or events on site. Such photographs shall be properly dated. This will include a photographic record of all major stages of construction, of all working and construction camp areas before and after the start of construction and at any time during construction if there are any deviations from or transgressions of the EMP that can be recorded on film. This record can be used, where applicable, in disputes with the Contractor regarding environmental matters, and for the review process after completion of construction.

Fines

The ER, at the request of the EO (and/or ECO) or of his own conviction, can impose fines on the Contractor for any contraventions of the EMP. The imposition of fines will enable the EO/ER to

ensure that the requirements of the EMP are taken seriously by the Contractor. The transgressions that will attract fines are listed in the detailed specification.

Removal from site, and suspension of the works

Non-compliance with the conditions of the EMP constitutes a breach of Contract. The ER has the power to remove from Site any person who is in contravention of the EMP, and if necessary, the ER can suspend part or all of the works, as required.

Internal review

An internal review procedure will be established by the EO/ER to monitor the progress and implementation of the EMP. Any modifications to the EMP will be issued as variation orders by the ER and registered in the records of the ER.

Contact details

Annexure A contains contact details for a number of different environmental authorities and departments in the City of Cape Town area.

Compliance with other legislation

It is important that the EO/ER is aware of other legislation that may relate to the activities taking place on Site. Annexure B contains a list of the relevant environmental legislation. It is important that the EO/ER is familiar with the applicable laws, by-laws and ordinances, and knows whom to contact in order to enforce them if necessary. If, at any time, the EO/ER is unsure of the legislation, the Responsible City of Cape Town Environmental Official may be contacted for advice.

The Responsible City of Cape Town Environmental Official

The Responsible City of Cape Town Environmental Official for this project is:

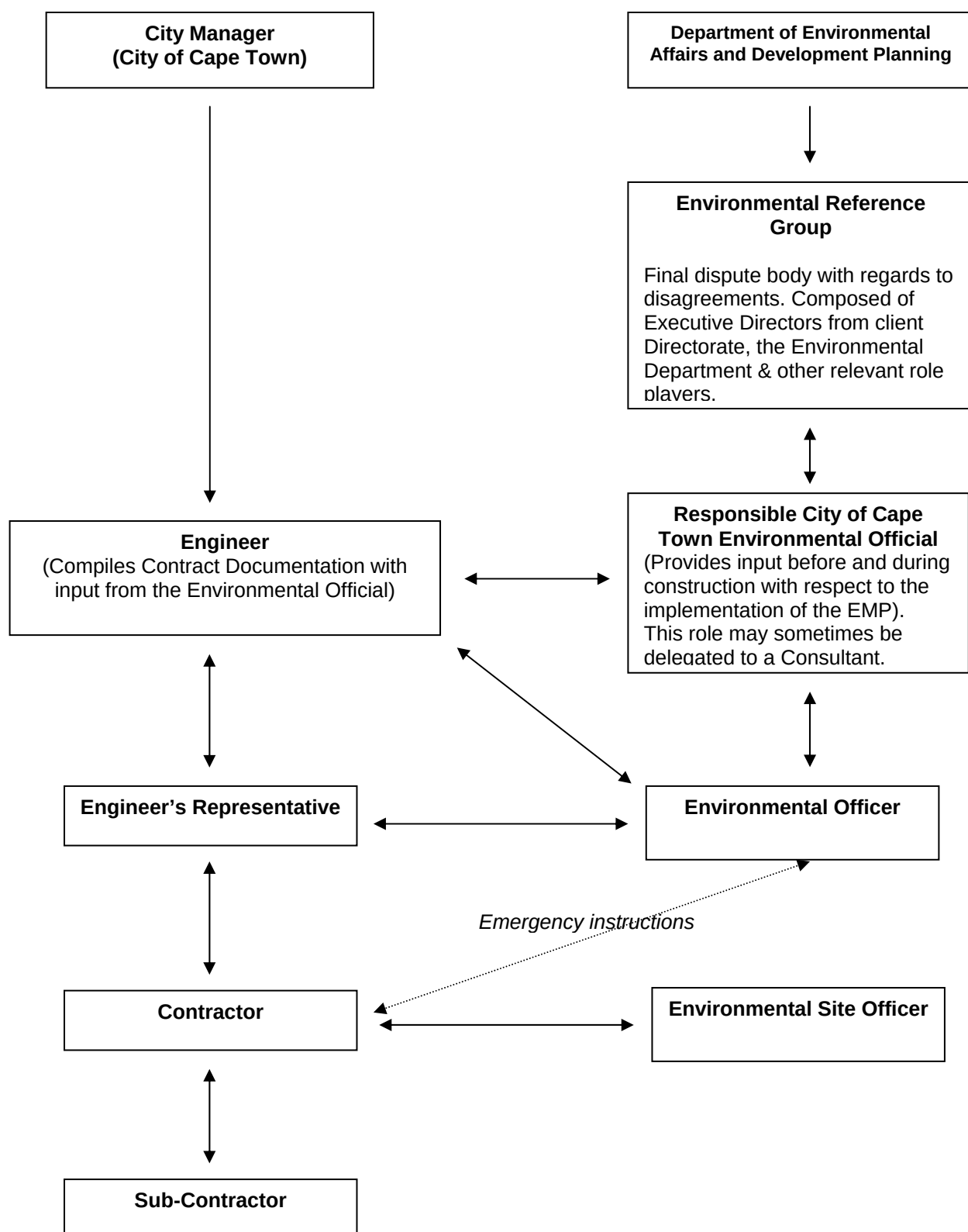
His/her contact details are as follows:

Phone:

Fax:

Cell:

Email:

Figure 1. Organogram

ANNEXURE A

CONTACT DETAILS LIST

This list is by no means exclusive, but does provide the contact details for the relevant environmental authorities and departments in the City of Cape Town. For more comprehensive information obtain the latest copy of the Environmental Resource Directory for the City of Cape Town from the City of Cape Town: (Telephone: 487 2839 or 487 2284). Reference can also be made to the City web site www.capetown.gov.za/environment.

**Provincial Administration: Western Cape
Chief Directorate: Environment and Land
Management**

C Rabie (Director) Integrated Environmental
Management Region A (Tygerberg area)
or

Anthony Barnes (Director) Region B (Helderberg and
Central Cape Town and West Coast)

AnBarnes@pgwc.gov.za

Deputy Directors

A2 Ayub Mohamed

AMohamed@pgwc.gov.za

021 483 3722

B1 Zaahir Toefy

ZaToefy@pgwc.gov.za

483 2701

B2 Paul Hardcastle

Phardcas@pgwc.gov.za

483 5687

Private Bag X9086, Cape Town, 8000

1 Dorp Street (2nd floor), Cape Town

Tel: (021) 483 5687

Fax: (021) 483 5172

**Marine and Coastal Management:
Department of Environmental Affairs and
Tourism**

Dr Neil Malan

DMalan@deat.gov.za

Tel: 021 402 3911 (switchboard)

Private Bag X2, Roggebaai, 8012

Foretrust Building, Martin

Hammerslagt Way, Cape Town

**South African Heritage Resources Agency
Heritage Western Cape**

Calvin van Wijk (Acting Deputy Director)

HWC@pgwc.gov.za

3rd floor, Protea Assurance Building, Greenmarket
Square, Cape Town

Tel 021 483 9692/5

Cape Peninsula National Park

Manager: Brett Myrdal

Mandyl@sanparks.org

Shop A1, Westlake Square, Cnr Westlake Drive
and Steenberg Rd, Westlake

Tel: (021) 701 8692

City of Cape Town: Air Pollution Control

Mr Niel Rossouw or Mr Ossie Oswald (all aspects)

Niel.Rossouw@capetown.gov.za

Ossie.Oswald@capetown.gov.za

Mr David Oliver (vehicle emissions)

David.Oliver@capetown.gov.za

Tel: 021 590 1419

246 Voortrekker Rd, Vasco.

Cape Nature

Mr Nazeem Jamie

Acting Chief Executive Officer

NJamie@capenature.co.za

Cape Nature House

Belmont Office Park

14 Belmont Road

Rondebosch

Tel. 021 659 3445

Department of Water Affairs and Forestry

Ms Thovo Ndiitwani

Ndiitwt@dwaf.gov.za

Tel: 021 950 7124

Private Bag X16, Befiville, 7140

17 Strand Road, Beliville

Tel: (021) 950 71

Fax: (021) 946 3666

City of Cape Town

Environmental Resource Management Department

Environmental Management Systems

Mr Keith Wiseman

Keith.Wiseman@capetown.gov.za

Tel. 487 2283

Biodiversity Management

Ms Julia Wood

Julia.Wood@capetown.gov.za

021 487 2353

P O Box 16548 Vlaeberg, 8018

44 Wale Street, Cape Town

South Peninsula

Environmental and Heritage Management

Natalie Newman

Natalie.Newman@capetown.gov.za

Private Bag X5, Plumstead, 7800

The Plessey Building, Corner Victoria and Main
Road, Plumstead

Tel: (021) 710 8049

Blaauwberg**Environmental and Heritage Management**

Pat Titmuss

Pat.Titmuss@capetown.gov.za

P O Box 35 Milnerton, 7435

Ground Floor, Milpark Centre, Corner Koeberg
Road and Ichsia Road,

Milnerton

Tel: (021) 550 1096

Cape Town**Environmental and Heritage Management**

Clive James

Clive.James@capetown.gov.za

PO Box 4518, Cape Town, 8000

16th Floor, Civic Centre, 12 Hertzog Boulevard,
Cape Town, 8000

Tel: (021) 400 3620

Emergencies (including spill and leaks)

107 or

021 480 7700

Incident (but not emergency) tel. 021 424 7715

ANNEXURE B

LEGISLATION

These are the most commonly applicable legislative references, but this list is by no means exhaustive.

NAME OF ACT OR ORDINANCE	AREA OF APPLICATION	RESPONSIBLE AUTHORITY
National Environmental Management: Air Quality Act 39 of 2004	Control of noxious and offensive gases, smoke, dust and vehicular emissions.	DEAT: Regional Air Pollution Control Office
Conservation of Agricultural Resources Act No. 43 of 1983	Control of the utilisation and protection of wetlands, soil conservation, control and prevention of veld fires, control of weeds and invader plants.	Department of Agriculture
Environment Conservation Act No. 73 of 1989 National Environmental Management, Act No. 107 of 1998	Control/prevention of pollution; combating of noise; activities which may have a detrimental effect on the environment, preparation and contents of environmental impact reports.	Department of Environmental Affairs and Tourism, Department of Water Affairs and Forestry, Department of Environmental Affairs and Development Planning, Western Cape - Directorate: Environment and Land Management,
Nature Conservation Ordinance No. 74 of 1979	Private Nature Reserves, Conservancies, Certificate of adequate enclosure, translocation and re-establishment of animals. Craft on inland waters. Certification of hunting regulations and protection of flora & fauna.	Cape Nature
National Environmental Management:: Biodiversity Act 10 of 2004	Provides for the management and conservation of South Africa's biodiversity within the framework of NEMA.	DEAT
Protected Areas Act 57 of 2003	Provides for the protection and conservation of ecologically viable areas representative of South Africa's biological diversity and its natural landscapes and seascapes.	DEAT
Fencing Act No. 31 of 1963	Clearing of bushes for border fencing, Access to property for fencing.	Department of Agriculture
Land Use Planning. Ordinance No. 85 of 1985 (Western Cape Planning and Development Act, No. 7 of 1999)	Land use and zoning.	Southern Cape District Council
Forest Act No. 122 of 1984 (National Act on Forests, Act No. 84 of 1998)	Control over encroaching, protection of trees on private land, prevention and extinction of fire hazards.	Cape Nature, Department of Water Affairs and Forestry

NAME OF ACT OR ORDINANCE	AREA OF APPLICATION	RESPONSIBLE AUTHORITY
National Veld and Forest Fires Act, No.101 of 1998	Fire Protection Associations. Building of fire breaks.	Department of Water Affairs and Forestry
National Water Act No. 36 of 1998 Water Services Act No. 108 of 1997	Diversions or impoundment of rivers. Conservation and use of water. Treatment and disposal of waste, wastewater and effluent; Pollution and pollution emergencies; Water Users Associations Dam safety. Registration of boreholes.	Department of Water Affairs and Forestry
Marine Living Resources Act No. 18 of 1998 Integrated Coastal Management Bill	Sustainable utilisation of marine living organisms.	DEAT: Coastal and Marine Management
Sea Shore Act No. 40 of 1935	The government is the owner of the sea and beach below the high water mark.	DEAT: Coastal and Marine Management
Health Act No. 63 of 1977	Control of solid, liquid and gaseous wastes that may pose a health hazard.	Department of Health and Local Authorities
Occupational Health and Safety Act No. 85 of 1993	Controls the exposure of employees and the public to dangerous and toxic substances or activities.	Department of Labour
National Heritage Resources Act No. 25 of 1999 World Heritage Resource Act 49 of 1999	Conservation of national heritage and archaeological material.	South African Heritage Resources Agency. National Council for Heritage
Extension of Security of Tenure Act 62 of 1997	Security of Tenure.	Department of Labour
Constitution Act No. 108 of 1996 Constitution of Western Cape Act 1 of 1998	The Constitution of South Africa.	National, Provincial and Local Government
Physical Planning Act No. 125 of 1991	To promote coordinated environmental planning and utilization of South Africa's resources and to provide for control and zoning of land	
Restitution of Land Rights Act No. 22 of 1994		
Local Government Transitional Act No. 204 of 1993		
Local Government Municipal Structures Act No. 117 of 1998	Provides for the establishment of municipalities, defines types of municipalities, and provides for a division of functions and powers between municipalities.	Local Authorities

NAME OF ACT OR ORDINANCE	AREA OF APPLICATION	RESPONSIBLE AUTHORITY
National Road Traffic Act No. 93 of 1996	Provides for road traffic matters which applies uniformly throughout South Africa.	Department of Transport
Promotion of Access to Information Act No. 2 of 2000	Provides detailed mechanisms that ensure access to information.	
Promotion of Administrative Justice Act 3 of 2000	Provides detailed mechanisms that ensure just administrative action.	
Advertising on Roads and Ribbon Development Act No. 24 of 1940	Regulates the display of adverts at places visible from public roads. Also controls the depositing of machinery or refuse, and the construction or laying of structures, near public roads.	Provincial Authorities
Animals Protection Act No. 71 of 1962	Provides for the protection of animals.	
Hazardous Substances Act No. 15 of 1973	Provides for the control of substances, which may cause injury or ill health to, or the death of human beings.	National Department of Health. Local Authorities may be authorized
Sea Birds and Seals Protection Act 46 of 1973	Provides for the protection of sea birds and seals.	Provincial Authorities
Road Transportation Act No. 74 of 1977		Department of Transport
Urban Transport Act 78 of 1977	Promotes the planning and provision of adequate urban transport facilities.	Local Authorities
National Building Regulations and Standards Act 103 of 1977 (SABS 0400)		
Dumping at Sea Control Act No. 73 of 1980	Controls the dumping of substances in the sea.	DEAT: Coastal and Marine Management

MOST RELEVANT POLICIES AND STRATEGIES

Provincial

Western Cape Province Urban Edge Guideline (2005)

Provincial Spatial Development Framework

Western Cape Promotion of Sustainable Development Bill

Draft Coastal Zone Policy for the Western Cape (2004)

Integrated Coastal Management Programme for the Western Cape (2003)

Strategic Infrastructure Plan for the Western Cape Province (2005)

Ikapa Elihlumayo: A framework for the development of the Western Cape Province 2004 – 2007

Local

Future Cape Town
Integrated Metropolitan Environmental Policy (IMEP)
Coastal Zone Management Strategy
Biodiversity Strategy
Energy and Climate Change Strategy
Heritage Strategy
Environmental Education Strategy
Catchment Management Strategy
Air Quality Management Plan
Integrated Waste Management Plan
Integrated Transport Plan 2006 - 2011
CMOSS – Open Space Strategy for City of Cape Town
Scenic Drive Network Management Plan 2003

National Departments exercising functions that involve the management of the environment

- Department of Environmental Affairs and Tourism
- Department of Water Affairs and Forestry
- Department of Minerals and Energy
- Department of Land Affairs
- Department of Health
- Department of Labour

ANNEXURE C

CHECKLISTS

The attached checklists are tools, which will aid the EO/ER in the implementation and enforcement of the EMP. Four different types of checklists have been attached, namely:

- Start-up Checklist
- Weekly Checklist
- Monthly Checklist
- Site Closure Checklist

It is imperative that the EO/ER undertakes to fill in the checklists on a weekly and monthly basis in order to ensure that the EMP is effectively implemented.

MONTHLY COMPLIANCE CERTIFICATE

This annexure contains a pro forma monthly compliance certificate that needs to be filled in by the Engineer's Representative and kept as a record of compliance and non-compliance during the contract. The relevant weekly and monthly checklists should be attached to this Certificate as supporting documentation. The Responsible City of Cape Town Environmental Official may request these certificates at any stage during the contract.

PROJECT START-UP CHECKLIST**Contract:**

ENVIRONMENTAL ASPECT	YES/NO (√ or X)	COMMENTS
• All environmental method statements required before commencement of the works have been submitted and approved.		
• A copy of the Contract Document is on Site.		
• Environmental Awareness education course has been given to everyone on Site and the attendance register given to EO / ER.		
• Telephone numbers of emergency services are available on Site.		
• List of hazardous materials on Site with storage, handling and disposal procedures, and relevant MSDS sheets.		
• Location and type of boundary fencing has been erected and complies with the specification		
• Solid waste management system has been established.		
• Wastewater management system has been established.		
• Location of construction camp and working area infrastructure comply with specifications.		
• All necessary fire-fighting equipment is on Site and in good working order.		

Completed by: **Sign:** **Date:**

WEEKLY CHECKLIST**Contract:**.....

ENVIRONMENTAL ASPECT	YES/NO (√ or X)	COMMENTS
• Contractor's camp is neat and tidy and the labourers' facilities are of an acceptable standard.		
• Waste control and removal system is being maintained.		
• Sufficient fire-fighting equipment is available on Site and is in good working order.		
• Wastewater control system is being maintained.		
• Boundary and other fences are being maintained.		
• Bunds/ drip trays are being emptied on a regular basis especially after rain).		
• All construction vehicles are in good working order and no leakages are visible.		
• Refuelling of vehicles is in accordance with the EMP specifications.		
• No go areas, remaining natural features and trees have not been damaged.		
• Dust control measures (if necessary) are in place and are effectively controlling dust.		
• Noise Control measures (if necessary) are in place and are working effectively.		
• Erosion control measures (if necessary) are in place and are effective in controlling erosion.		
• Stockpiles of topsoil are located within the boundary of the site and do not exceed 2 m in height.		
• Any spot fines, penalties have been recorded in the Site Diary		

Completed by:**Sign:**.....**Date:**

MONTHLY CHECKLIST**Contract:**

ENVIRONMENTAL ASPECT	YES/NO (√ OR X)	COMMENTS
• The EMP is an item on the Monthly Site Meeting Agenda		
• The Contractor has made staff numbers report available		
• All new personnel on site are aware of the contents of the EMP and have been through the environmental awareness course.		
• Construction activities are being undertaken according to approved method statements		
• Fuel and flammable material storage areas comply with general fire safety requirements.		
• Public complaints have been recorded and dealt with in a satisfactory manner.		
• Monthly Compliance Certificate has been completed.		

Completed by:**Sign:****Date:**.....

SITE CLOSURE CHECKLIST**Contract:**

ENVIRONMENTAL ASPECT	YES / NO (√ OR X)	COMMENTS
• Contractor has cleared everything not forming part of the permanent works		
• Environmental Snag List has been compiled		
• Revegetation and rehabilitation has been satisfactorily completed and in accordance with the Revegetation and Rehabilitation Specification		
• All areas disturbed by the Contractor have been rehabilitated in accordance with the Revegetation Specification		
• Outstanding fines have been deducted from the Final Payment Certificate		

Completed by:.....**Sign:****Date:**

MONTHLY COMPLIANCE CERTIFICATE

FOR PERIOD..... ..TO..... ..

CONTRACT:

.....

ENGINEER'S REPRESENTATIVE: **SIGN:**

Date of Submission:

Key activities on site during the month:

.....

.....

.....

NON-CONFORMANCE

Area of activity:

.....

.....

.....

Reason:

.....

.....

.....

Responsible Party:

.....

.....

.....

Results:

.....

.....

.....

Corrective action taken:

Intended follow-up:

GOOD PERFORMANCE

Description of activity or action in which contract went beyond compliance towards responsible care for the environment:

INTERACTION WITH THE PUBLIC AND ADDITIONAL COMMENTS

*Supporting photographs to be attached if appropriate