

ENVIRONMENTAL MANAGEMENT PLAN

Waste & Recycling Methodology

ISO 14001:2015 Equivalent Framework

LINDIZWE SCRAP METALS

80 Radio Road, Alberton North, Gauteng, South Africa

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Approved By:	<i>Edhan Maphura</i>

CONFIDENTIAL — CONTROLLED DOCUMENT

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1. INTRODUCTION & ORGANISATION PROFILE

1.1 Purpose of this Document

This Environmental Management Plan (EMP) establishes the environmental management framework for Lindizwe Scrap Metals ("the Company"). It is structured to be equivalent to the requirements of ISO 14001:2015 — the international standard for Environmental Management Systems (EMS) — and demonstrates the Company's commitment to operating in an environmentally responsible manner consistent with South African legislation.

This document serves as a working management tool and a demonstration to clients, regulators, and stakeholders that the Company systematically identifies, controls, and improves its environmental performance.

1.2 Organisation Details

Field	Detail
Company Name	Lindizwe Scrap Metals
Trading As	Lindizwe Scrap Metals
Physical Address	80 Radio Road, Alberton North, Gauteng, South Africa
Industry Sector	Scrap Metal Collection, Processing & Recycling (SIC 37100)
Business Activity	Purchase, sorting, processing, storage, and sale of ferrous and non-ferrous scrap metal
Primary Contacts	Director / Environmental Representative
EMP Reference No.	LSM-EMP-001
Date of Issue	April 2026
Next Review Date	April 2027

1.3 Scope of this EMP

This EMP applies to all operations conducted at 80 Radio Road, Alberton North, including:

- Receiving and weighing of scrap metal from suppliers and public walk-ins
- Sorting and segregation of ferrous and non-ferrous materials
- Processing operations including shearing, baling, and torch-cutting
- On-site storage of all scrap categories pending dispatch
- Dispatch and transportation coordination
- Management of waste streams generated on-site
- Maintenance and housekeeping activities

2. ENVIRONMENTAL POLICY STATEMENT

LINDIZWE SCRAP METALS — ENVIRONMENTAL POLICY

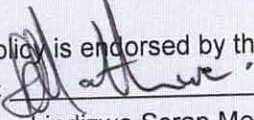
Lindizwe Scrap Metals is committed to conducting all operations in a manner that protects the natural environment, complies with all applicable South African environmental legislation, and continually improves our environmental performance.

We recognise that our core business activity — the collection and recycling of scrap metal — makes a positive contribution to resource conservation and the circular economy. We commit to maximising this positive contribution while minimising any negative environmental impacts from our site operations.

Specifically, Lindizwe Scrap Metals commits to:

- Complying with the National Environmental Management Act (NEMA), National Environmental Management: Waste Act (NEM:WA), and all other applicable environmental legislation
- Identifying and controlling all significant environmental aspects arising from our operations
- Implementing a structured waste segregation and recycling programme to minimise waste sent to landfill
- Preventing pollution of soil, groundwater, storm water, and air through effective operational controls
- Setting measurable environmental objectives and targets and reviewing them annually
- Training all employees to understand and fulfil their environmental responsibilities
- Communicating our environmental performance transparently to relevant interested parties
- Continuously improving this Environmental Management Plan

This policy is endorsed by the Director of Lindizwe Scrap Metals and shall be reviewed annually.

Signed: 
Director, Lindizwe Scrap Metals

Date: 29 June 2026

3. LEGISLATIVE & REGULATORY FRAMEWORK

3.1 Key Applicable Legislation

The following legislation, regulations, and standards are applicable to the operations of Lindizwe Scrap Metals. This list is maintained as a living Legal Register (see Section 16).

Legislation / Regulation	Relevance	Key Requirements
National Environmental Management Act 107 of 1998 (NEMA)	Primary environmental framework	Duty of care; polluter pays; integrated environmental management
NEM: Waste Act 59 of 2008 (NEM:WA)	Waste classification & management	Waste licensing; storage requirements; general duty of care for waste
NEM:WA General Waste Regulations (GN R.636 of 2012)	On-site waste handling	Segregation, storage, labelling, and disposal of general waste
NEM:WA Hazardous Waste Regulations	Hazardous waste management	Classification, manifesting, storage, and approved disposal
National Water Act 36 of 1998	Storm water & groundwater	Prevention of water resource pollution; storm water management
Water Services Act 108 of 1997	Effluent disposal	Trade effluent management; compliance with municipal bylaws
National Environmental Management: Air Quality Act 39 of 2004	Dust, fumes, particulates	Listed activities; atmospheric emission licence (if applicable)
Gauteng Environmental Management Framework	Provincial planning	Land use compatibility; regional environmental objectives
Ekurhuleni Metropolitan Municipality Bylaws	Local compliance	Storm water management; waste disposal; nuisance control
Occupational Health & Safety Act 85 of 1993	Worker health & safety	Safe handling of hazardous substances; noise; dust
SANS 10234 / GHS	Chemical classification	Labelling and SDS requirements for hazardous substances

3.2 Waste Classification

Lindizwe Scrap Metals classifies all waste streams in accordance with the Classification of Wastes Regulations (GN R.634) published under NEM: WA, using the South African National Standard (SANS) waste classification codes. A full waste stream register is maintained as part of the Legal Register (Section 16).

4. CONTEXT OF THE ORGANISATION (ISO 14001 Clause 4)

4.1 Understanding the Organisation and its Context

The Company has conducted an environmental context analysis, identifying internal and external issues that are relevant to its environmental purpose and that affect its ability to achieve the intended outcomes of its EMS.

4.1.1 External Issues

- Proximity to residential areas — potential for noise, dust, and odour complaints
- Local water table and drainage patterns — risk of soil and groundwater contamination
- Regulatory environment — increasing enforcement of NEM:WA and Gauteng provincial requirements
- Market for recyclable materials — pricing volatility affecting operational decisions
- Expectations of local community and Ekurhuleni Metropolitan Municipality

4.1.2 Internal Issues

- Processing and cutting activities generating dust, fumes, and noise
- Storage of varied scrap materials including those with residual fluids (oils, coolants)
- Vehicle traffic within the yard — fuel spills and exhaust emissions
- Employee awareness and competency levels
- Limited on-site wastewater treatment infrastructure

4.2 Interested Parties

Interested Party	Needs & Expectations
Ekurhuleni Metropolitan Municipality	Compliance with bylaws; no pollution of municipal storm water/sewer
Gauteng Department of Agriculture & Rural Development (GDARD)	Compliance with NEMA, NEM:WA, and AQA; valid authorisations
Neighbours and local community	Minimisation of noise, dust, odour, and visual impact
Employees	Safe and healthy working environment; environmental training
Suppliers & customers	Responsible handling of materials; legal compliance
Emergency services	Accessible site; chemical storage register; spill preparedness
Department of Water & Sanitation	Protection of water resources from pollution



5. LEADERSHIP & COMMITMENT (ISO 14001 Clause 5)

5.1 Management Roles and Responsibilities

The Director of Lindizwe Scrap Metals holds ultimate accountability for environmental performance. An Environmental Representative (ER) is appointed to have day-to-day responsibility for implementing and maintaining this EMP.

Role	Environmental Responsibilities	Frequency
Director	Approve and sign EMP & Policy; allocate resources; review performance	Annual minimum
Environmental Representative (ER)	Implement EMP; conduct inspections; maintain registers; liaise with regulators; manage training	Daily / ongoing
Yard Supervisor / Foreman	Enforce operational controls; supervise waste segregation; report incidents immediately	Daily
All Employees	Follow environmental procedures; report spills/incidents; attend training	As required
Maintenance Technician	Manage vehicle and equipment fluids; maintain drip trays; report leaks	Daily



6. PLANNING & ENVIRONMENTAL ASPECTS (ISO 14001 Clause 6)

6.1 Environmental Aspects & Impacts Register

The Company has identified all activities, products, and services that can interact with the environment. For each activity, environmental aspects (what can cause an impact) and their associated environmental impacts (the actual effect on the environment) are identified. Significance is rated using Likelihood x Severity x Extent scoring.

Scoring Guide: Likelihood (1=Rare, 2=Unlikely, 3=Possible, 4=Likely, 5=Almost certain); Severity (1=Insignificant, 2=Minor, 3=Moderate, 4=Major, 5=Catastrophic); Extent (1=Local/contained, 2=Site boundary, 3=Off-site). Score = L x S x E. Significant if score ≥ 12 .

Activity	Aspect	Impact	Control Measure	L	S	E	Score
Metal processing / cutting	Airborne dust & metal particulates	Air quality / respiratory health	Respiratory PPE; water suppression; limit dry cutting	3	3	2	18 HIGH
Torch cutting / welding	Fumes and combustion emissions	Air quality degradation	Ventilation; low-fume consumables; PPE; downwind control	3	3	2	18 HIGH
Storage of scrap with fluids	Oil / coolant / fuel leakage	Soil & groundwater contamination	Drip trays; impervious bunds; fluid drainage prior to storage	4	4	1	16 HIGH
Storm water runoff from yard	Contaminated runoff to drain	Water resource pollution	Interceptor drains; storm water management plan; regular sweeping	3	4	2	24 HIGH
Vehicle movement	Fuel/oil spills; exhaust	Soil contamination; air quality	Drip trays; vehicle maintenance; no idling policy	3	2	1	6 LOW
Waste generation	General waste to landfill	Landfill capacity; resource loss	Waste segregation; maximise recycling; licensed disposal contractor	4	2	1	8 MED
Battery storage / processing	Acid spills; lead contamination	Soil & water toxicity	Segregated, roofed battery store; acid-resistant containment bund	3	4	1	12 HIGH
Noise from operations	Excessive noise levels	Nuisance to neighbours/staff	Equipment silencers; operational hours; noise monitoring	3	2	2	12 MED
Hazardous waste storage	Improper storage of HW	Soil/water pollution; regulatory non-compliance	Labelled, roofed HDPE containers; manifest system;	2	4	2	16 HIGH



			licensed contractor				
Fire risk (fuel/oil stores)	Fire and combustion products	Air pollution; material loss	Fire extinguishers; fire assembly points; no smoking policy	2	4	2	16 HIGH

6.2 Environmental Objectives & Targets

Annual environmental objectives and targets are established, monitored, and reviewed. These are detailed in the Environmental Objectives Register (Section 15). Key objectives include:

- Reduce volume of waste to landfill by 15% year-on-year through improved segregation
- Achieve zero significant soil contamination incidents per year
- Ensure 100% of hazardous waste is disposed of via a licensed contractor
- Complete environmental training for 100% of staff annually
- Conduct monthly environmental inspections with documented findings

7. SUPPORT & RESOURCES (ISO 14001 Clause 7)

7.1 Resources

The Director commits to providing the necessary financial, human, and infrastructural resources to implement and maintain this EMP. Resources include:

- Dedicated Environmental Representative time allocation
- Provision of appropriate waste containers, bunds, and drip trays
- Contracts with licensed waste disposal contractors
- Budget for environmental training and awareness activities
- PPE (respiratory, skin, eye protection) for all relevant tasks

7.2 Competence & Training

All employees who carry out tasks that have the potential to cause a significant environmental impact shall be trained and deemed competent. The following training programme is maintained:

Training Topic	Target Audience	Frequency
Environmental Management Plan Induction	All new employees	On appointment
Waste Segregation Procedures	All yard staff	Annually + on change
Spill Response Procedures	All staff	Bi-annually
Hazardous Materials Handling	Applicable staff	Annually
Emergency Evacuation & Fire Response	All staff	Annually
Environmental Legislation Update	ER + Management	Annually
Equipment Operation (environmental controls)	Equipment operators	On deployment

7.3 Communication

Environmental performance and requirements are communicated as follows:

- Internal: toolbox talks, notice boards, training sessions, incident debriefs
- External: available to regulators and interested parties upon request
- The Environmental Policy is displayed in the site office and available to all employees

7.4 Document Control

All documents forming part of the EMS are controlled in accordance with the Document Control procedure. Refer to Section 17 for full details.

8. OPERATIONAL CONTROLS (ISO 14001 Clause 8)

8.1 Scrap Receiving & Intake Controls

The intake of scrap metal represents the primary operational activity. The following controls apply:

1. All incoming loads shall be visually inspected before acceptance to identify prohibited or problematic materials (e.g., radioactive materials, sealed gas cylinders, asbestos-containing materials, and PCB transformers).
2. Prohibited materials shall be refused. A written Prohibited Materials Register shall be maintained.
3. Scrap containing residual oils, coolants, or fuels (e.g., engines, fuel tanks) shall be placed on impervious hard standing with bunted containment pending drainage.
4. All fluids drained from incoming scrap shall be collected in labelled, sealed containers and managed as hazardous waste.
5. All intake must be weighed, recorded in the daily register with supplier details, to support the waste tracking system.

8.2 Sorting & Processing Controls

Processing activities include manual sorting, shearing, baling, and torch-cutting. The following controls are mandatory:

- Impervious (concrete or compacted hardstand) surfaces shall be maintained in all active processing areas to prevent soil contamination
- Water suppression shall be used during dry cutting and grinding operations to reduce airborne dust
- Torch cutting shall be performed in designated areas with adequate natural or mechanical ventilation
- Appropriate PPE (respirator, eye protection, hearing protection, gloves) shall be worn during all processing activities
- Cutting and processing equipment shall be maintained in good working order. Leaking equipment shall be taken out of service immediately
- All metal turnings, fines, and residues from processing shall be captured and added to the appropriate recycling stream — none shall be swept to ground or drain

8.3 Storage Controls

On-site storage of scrap metal is regulated to prevent environmental impact:

- Scrap shall be stored in clearly demarcated, labelled bays on hard standing
- Materials containing fluids (engines, radiators, fuel tanks) shall be stored in bunted areas or on drip trays pending processing
- Batteries (lead-acid, lithium-ion) shall be stored in a dedicated, roofed, ventilated, and bunted battery storage area
- Stacking heights shall not compromise structural stability or impede access for emergency response
- Storm water drainage paths shall be kept clear of all stored materials

8.4 Stormwater Management

Storm water management is a critical control given the potential for yard runoff to transport contaminants:

- The site storm water drainage plan shall be maintained and all drainage routes inspected monthly
- Oil/water interceptors shall be installed on storm water drains discharging from the processing and storage areas
- Interceptors shall be inspected monthly and cleaned quarterly, or more frequently if contamination is observed
- The yard shall be swept regularly to remove metal fines and other solids from drainage paths
- No direct discharge of contaminated water, oil, or chemicals to storm water drains is permitted
- In the event of heavy rainfall, storm drains shall be inspected before and after the event for contamination



9. WASTE MANAGEMENT METHODOLOGY

9.1 Waste Management Hierarchy

Lindizwe Scrap Metals applies the South African Waste Management Hierarchy as the guiding principle for all waste decisions. In order of preference:

WASTE MANAGEMENT HIERARCHY (NEM:WA Section 3)

1. AVOIDANCE

Minimise waste generation at source — refuse contaminated loads; separate clean from contaminated scrap at intake

2. REDUCTION

Reduce waste quantities — optimise processing to minimise off-cuts and fines; maintain equipment to reduce fluid waste

3. RE-USE

Re-use where possible — packaging materials; pallets; process water

4. RECYCLING

Core business activity — maximise diversion of all metal streams to recycling; segregate non-metal recyclables

5. RECOVERY

Energy or material recovery from residual waste streams

6. DISPOSAL (LAST RESORT)

Licensed landfill or approved treatment only — all disposal must be via a registered waste transporter with waste manifest

9.2 On-Site Waste Storage Requirements

All waste generated on-site shall be stored in accordance with the following minimum requirements:

Waste Type	Storage Requirement	Labelling
General waste (non-recyclable)	Clearly labelled colour-coded wheeled bins (black); located on hard standing	Black bag / 'General Waste'
Recyclable general waste (paper/plastic)	Separate colour-coded bins (yellow); under cover	'Recyclable Waste'
Used oils / hydraulic fluids	Sealed HDPE drum in bunted store; leak-proof container	GHS label; 'Used Oil — Hazardous'
Batteries (lead-acid)	Roofed, ventilated, acid-resistant bunted store; upright; non-sparking area	'Batteries — Hazardous — No Sparks'
Lithium-ion batteries	Separate dry metal fire-rated cabinet or sand-filled container	'Li-Ion Batteries — Fire Hazard'
Contaminated rags/absorbent material	Sealed metal lidded bin inside hazardous store	'Contaminated Waste — Hazardous'
Metal processing residues (turnings, fines)	Dedicated labelled skip or bin; added to metal recycling stream	'Metal Fines — Recyclable'

Electronic waste (e-waste)

Designated e-waste container;
separate from metal stream

'E-Waste — Do Not Landfill'

9.3 Waste Transport and Disposal

- All waste transported off-site must be done by a registered waste management contractor holding a valid NEM:WA registration
- A waste manifest (consignment note) shall be completed for every load of hazardous waste removed from site. Copies shall be retained for a minimum of 5 years
- General waste shall be disposed of at a licensed waste disposal site. Proof of disposal (receipt/weighbridge tickets) shall be filed
- The Environmental Representative shall maintain a Waste Disposal Register recording: date, waste type, quantity, transporter, disposal site, and manifest number
- No waste shall be burnt on-site
- No waste shall be buried on-site
- No waste shall be discharged to storm water or sewer without appropriate authorisation



10. RECYCLING METHODOLOGY & MATERIAL CLASSIFICATION

10.1 Core Recycling Operations

The fundamental purpose of Lindizwe Scrap Metals is to divert metal resources from landfill and return them to the manufacturing supply chain. The following methodology governs recycling operations:

10.2 Material Classification & Segregation

Material Category	Examples	Processing / Destination
Ferrous — Unprepared (HMS 1)	Heavy structural steel, I-beams, thick plate > 6mm	Shear or torch-cut to specification; bale or bundle for steel mills
Ferrous — HMS 2 / Shredder Feed	Thin plate, sheet metal, stampings, auto bodies	Shred, bale, or cut; steel mills / foundries
Ferrous — Cast Iron	Engine blocks, manhole covers, brake drums	Segregated; foundry grade; sold to iron foundries
Ferrous — Turnings & Borings	Machine shop swarf, lathe turnings	Segregated in sealed skips; foundry grade after drying
Non-Ferrous — Copper (Bright)	Bare bright copper cable, bus bars	Segregated; high value; copper smelters / refiners
Non-Ferrous — Copper (Mixed)	Insulated cable, mixed copper	Separate from bright; further processing if cable stripping performed
Non-Ferrous — Aluminium (Old Cast)	Engine blocks, wheels, castings	Segregated by alloy where possible; aluminium smelters
Non-Ferrous — Aluminium (Old Sheet/Wire)	Extrusions, sheet, wire, cans	Segregated; baled where possible; aluminium smelters
Non-Ferrous — Stainless Steel	Grades 304, 316, 430 — kitchen equipment, pipe, vessels	Magnet-test identification; segregated; stainless mills
Non-Ferrous — Brass / Bronze	Fittings, valves, bearings, bushes	Segregated; brass foundries / smelters
Non-Ferrous — Lead	Wheel weights, cable sheathing (not batteries)	Segregated; stored in sealed containers; lead smelters
Non-Ferrous — Zinc	Die castings, galvanised material	Segregated; zinc smelters
Batteries (lead-acid)	Vehicle, industrial, UPS batteries	Managed as hazardous waste; licensed battery recycler only
E-Waste / Catalytic converters	Precious metal bearing components	Segregated; specialist e-waste / PGM recycler

10.3 Material Identification Tools

Correct segregation is critical to maximising recycling value and maintaining compliance. The following identification tools are used:

- Magnetic separation — distinguishes ferrous from non-ferrous
- Visual inspection — colour, surface characteristics, weight
- XRF analyser (if available) — non-destructive elemental composition analysis for high-value non-ferrous alloy grading

- Acid testing — confirmatory testing for stainless steel grades
- Spark testing — confirmatory testing for ferrous alloy classification

10.4 Preventing Contamination of Recyclable Streams

Contamination reduces the value and recyclability of material streams. The following contamination prevention measures are mandatory:

- Fluids must be drained from all components before processing. Contaminated fluids are managed as hazardous waste
- Non-metallic attachments (rubber, plastic, wiring insulation) must be removed from metal before it enters the final recyclable stream where practically feasible
- Segregation bays must be clearly marked with signage and colour-coding
- Mixing of metal grades (e.g., copper with aluminium) is prohibited in designated single-material storage areas
- Supervisors shall conduct daily visual checks of segregation bins to identify cross-contamination

11. HAZARDOUS MATERIALS MANAGEMENT

11.1 Prohibited Materials

The following materials shall NOT be accepted under any circumstances and shall be refused at intake:

- Sealed gas cylinders (any type — risk of explosion during cutting)
- Radioactive materials or equipment (luminous dials, radiation sources)
- Asbestos-containing materials
- PCB-containing equipment (older transformers, capacitors)
- Unexploded ordnance or ammunition
- Any material suspected of being stolen property (requires SAPS involvement)

11.2 Hazardous Materials That May Be Accepted

The following materials are accepted under strictly controlled conditions:

Material	Control Measures Required
Lead-acid batteries	Segregated banded store; acid-resistant PPE; managed as HW; licensed recycler only
Lithium-ion batteries	Fire-rated storage; no crushing; damaged units in sand; specialist recycler
Vehicles / engines with residual fluids	Impervious stand; drain oils, coolants, fuel before processing; fluid managed as HW
Fuel tanks	Must be emptied, purged, and rendered safe before cutting — explosive risk
Transformers (non-PCB confirmed)	Visual inspection; if in doubt, test; PCB contamination renders unit prohibited
Refrigerants (white goods)	Refrigerants must be recovered by certified F-Gas technician before processing
Mercury-containing switches/gauges	Handled with care; segregated; specialist HW contractor for disposal

11.3 Chemical Storage

Any chemicals stored on-site (fuels, lubricants, solvents, acids) shall be managed as follows:

- All stored chemicals shall be listed in the Chemical Register with current Safety Data Sheets (SDS) filed in the site office
- Storage quantities shall be minimised to operational requirements
- All chemical storage areas shall be bunted with containment capacity of 110% of the largest vessel
- Incompatible chemicals shall not be stored together (refer to SDS)
- All containers shall be labelled in compliance with GHS/SANS 10234
- Spill kits shall be accessible adjacent to all chemical storage areas

12. EMERGENCY PREPAREDNESS & RESPONSE (ISO 14001 Clause 8.2)

12.1 Identified Emergency Scenarios

Emergency Scenario	Primary Response
Chemical / fuel spill to ground or drain	Activate spill kit; contain; notify ER; prevent drain entry; report
Fire involving scrap, chemicals, or batteries	Activate fire extinguisher (correct type); evacuate; call 10111/112; notify ER
Storm water contamination event	Block outfall; contain source; notify Ekurhuleni storm water department; report to GDARD
Discovery of prohibited material (e.g., radiation)	Do not disturb; evacuate immediate area; notify SAPS; notify NNR if radiation suspected
Major dust or fume release	Cease operations; notify neighbours if necessary; investigate cause; implement controls
Explosion risk (sealed cylinder discovered in processing)	STOP WORK; move personnel; do not cut; notify ER; arrange safe removal

12.2 Spill Response Procedure

6. STOP the activity causing the spill immediately
7. ASSESS — determine what has spilled, how much, and whether it has reached a drain
8. CONTAIN — deploy absorbent socks/booms around drain inlets and the spill perimeter
9. ABSORB — apply granular or pad absorbent material; never use water to dilute oil spills on ground
10. RECOVER — collect contaminated absorbent material in labelled containers; manage as hazardous waste
11. REPORT — notify the Environmental Representative immediately; log the incident
12. INVESTIGATE — determine root cause and implement corrective action to prevent recurrence
13. If spill has entered storm water drain — notify Ekurhuleni Municipality Environmental Health and GDARD within 24 hours

12.3 Emergency Contact Numbers

Contact	Number
Ekurhuleni Emergency Services	011 458 0911
SAPS (Police)	10111
National Emergency Number	112
Gauteng Pollution Hotline (GDARD)	0800 203 900
Department of Water & Sanitation	0800 200 200
Site Environmental Representative	To be completed by site
Director (after hours)	To be completed by site
Waste Contractor (emergency)	To be completed by site

13. PERFORMANCE EVALUATION (ISO 14001 Clause 9)

13.1 Environmental Monitoring Programme

Parameter	Method / Measurement	Frequency
Storm water quality at outfall	Visual inspection; pH/oil sheen check; sample if abnormal	Monthly
Oil/water interceptor condition	Visual inspection; measure sludge/oil layer	Monthly; clean quarterly
Waste quantities generated	Weigh all waste streams; record in Waste Register	Per collection
Recycling volumes by material	Weigh tickets from all dispatch loads	Per dispatch
Chemical store integrity	Visual inspection of containers, bunds, and labels	Monthly
Battery storage area	Inspect for leaks, damage, labelling, bund integrity	Monthly
Prohibited materials incidents	Record all refused loads; classify by reason	Per occurrence
Training completion	Training Register sign-off sheets	Per training event
Environmental complaints	Log all complaints received; track resolution	Per occurrence
Spill incidents	Incident Register with root cause and corrective action	Per occurrence
Legal compliance status	Legal Register review against current legislation	Annually

- Changes in available technology or best practice for the scrap metal industry
- Review of environmental performance data and trend analysis

15. ENVIRONMENTAL OBJECTIVES & TARGETS REGISTER

The following objectives and targets apply for the current review period (April 2026 – March 2027):

Objective	Target	KPI / Measure	Responsible	Review Date
Reduce waste to landfill	15% reduction vs prior year	Monthly waste disposal weights (kg/t)	Env. Rep.	Mar 2027
Zero soil contamination events	0 significant soil contamination incidents	Incident Register	Yard Supervisor	Ongoing
100% licensed HW disposal	All hazardous waste via licensed contractor	Manifest Register — zero gaps	Env. Rep.	Ongoing
Staff training completion	100% of staff trained annually	Training Register	Env. Rep.	Dec 2026
Monthly site inspections	12 inspections per year; all documented	Inspection records on file	Env. Rep.	Monthly
Prohibited material refusals	Zero acceptance of prohibited materials	Intake Register; refusal log	Yard Supervisor	Ongoing
Legal compliance	Full compliance with all applicable legislation	Annual legal register review	Director / ER	Mar 2027
Recycling rate	>=95% of all incoming material diverted to recycling	Weighbridge data: recycled vs disposed	Env. Rep.	Mar 2027



16. LEGAL REGISTER

The Legal Register below is a summary. A full working Legal Register (EMP-DOC-006) shall be maintained separately and reviewed at least annually, or when new legislation is promulgated. The ER is responsible for monitoring the Government Gazette and regulatory notifications for updates.

Act / Regulation	Key Obligation for LSM	Status
NEMA 107 of 1998	Duty of care; integrated environmental management; polluter pays	Comply — ongoing
NEM:WA 59 of 2008	Waste licence/registration if applicable; duty of care for all waste; no unauthorised disposal	Verify registration threshold
GN R.636 (General Waste Rags)	Segregate, store, label general waste correctly; use licensed disposal sites	Comply — ongoing
Hazardous Waste Rags (NEM:WA)	Classify, manifest, store, and dispose of HW correctly via licensed contractors	Comply — ongoing
National Water Act 36 of 1998	No discharge to water resources without WUL; stormwater management	Comply — no discharge
Air Quality Act 39 of 2004	Assess if processing activities constitute a Listed Activity requiring AEL	Review with GDARD
OHS Act 85 of 1993	Safe handling of hazardous substances; noise; dust; PPE	Comply — ongoing
Ekurhuleni Municipal Bylaws	No pollution of stormwater; waste disposal compliance; nuisance control	Comply — ongoing

17. DOCUMENT CONTROL & REVIEW

17.1 EMS Document List

Document	Reference No.	Custodian
Environmental Management Plan (this document)	LSM-EMP-001	Director / Env. Rep.
Environmental Policy (signed)	LSM-EMP-002	Director
Environmental Aspects & Impacts Register	LSM-EMP-003	Env. Rep.
Environmental Objectives & Targets Register	LSM-EMP-004	Env. Rep.
Legal Register	LSM-DOC-006	Env. Rep.
Monthly Inspection Checklist	EMP-FORM-001	Env. Rep.
Non-Conformance & Corrective Action Register	EMP-FORM-002	Env. Rep.
Waste Disposal Register & Manifests	EMP-FORM-003	Env. Rep.
Chemical Register & SDS File	EMP-FORM-004	Env. Rep.

13.2 Internal Environmental Inspections

The Environmental Representative shall conduct a formal monthly Environmental Compliance Inspection of the entire site using the approved checklist (EMP-FORM-001). Inspection findings shall be graded:

- GREEN — Satisfactory; no action required
- AMBER — Minor non-conformance; corrective action within 30 days
- RED — Major non-conformance or imminent risk; immediate corrective action required; escalate to Director

13.3 Management Review

The Director shall convene an annual EMS Management Review. Inputs shall include:

- Results of environmental monitoring
- Audit findings and internal inspection results
- Status of environmental objectives and targets
- Incidents and complaints received
- Changes in applicable legislation
- Resource requirements

Outputs of the management review shall include decisions on objectives, resource allocation, and any required changes to the EMP.

14. IMPROVEMENT & CORRECTIVE ACTION (ISO 14001 Clause 10)

14.1 Non-Conformance and Corrective Action

When a non-conformance with this EMP, applicable legislation, or environmental procedure is identified, the following process shall be followed:

14. Identify and record the non-conformance in the NCR Register (EMP-FORM-002)
15. Implement immediate containment actions to prevent further environmental impact
16. Conduct a root cause analysis (5-Whys or Fishbone method)
17. Develop and implement a corrective action plan with assigned responsibilities and deadlines
18. Verify the effectiveness of the corrective action within the agreed timeframe
19. Close out the NCR in the register; communicate outcome to relevant parties
20. Assess whether the root cause indicates a systemic issue requiring revision of this EMP

14.2 Continual Improvement

Lindizwe Scrap Metals is committed to the continual improvement of its environmental management system and environmental performance. Improvement opportunities are identified through:

- Monthly inspection findings
- Annual management review outputs
- Feedback from employees, customers, and interested parties

Training Register	EMP-FORM-005	Env. Rep.
Incident & Spill Register	EMP-FORM-006	Env. Rep.
Prohibited Materials Intake Register	EMP-FORM-007	Yard Supervisor
Emergency Contact List	EMP-FORM-008	Env. Rep.

17.2 Document Control Rules

- The current version of this EMP is the controlled version. All printed copies are uncontrolled unless stamped 'CONTROLLED COPY'.
- Amendments require approval by the Director and shall be recorded in the amendment log below.
- Superseded versions shall be archived and retained for a minimum of 5 years.
- This EMP shall be reviewed annually or following any significant environmental incident, regulatory change, or material change to site operations.

17.3 Amendment Log

Version	Date	Amendment Description
1.0	April 2026	Initial issue of EMP for Lindizwe Scrap Metals

END OF DOCUMENT

Lindizwe Scrap Metals | 80 Radio Road, Alberton North | LSM-EMP-001 v1.0 | April 2026

