

WEBBER WENTZEL

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COVID-19 SURVIVAL CHECKLIST

The purpose of this checklist is to assist clients with ascertaining their level of compliance risk and to provide guidance as the lockdown is eased. In order to be effective, this checklist should be tailored for each specific business to ensure that the risk of non-compliance is minimised as far as possible.

General compliance

Have applicable environmental laws and the facility's environmental approvals and licences been assessed to determine possible non-compliance as a result of the initial ramping-down measures that have been taken?

Notification and procedural requirements

Were authorities required to be notified of the temporary closure or ramping down of the facility?

Are authorities required to be notified before ramping-up the facility?

Have environmental permits and licences been assessed to ascertain whether closing and ramping-up the facility is subject to a particular procedure that must be followed?

Are sufficient and appropriately trained employees available to ensure that obligations prescribed in terms of environmental permits and legislation can continue during lockdown?

Is there a procedure in place to address environmental compliance considerations for purposes of ensuring that appropriate management takes place under the different Alert Levels? Businesses in areas which are declared "hotspots" in particular should be prepared for the possibility of moving back to more restrictive Alert Levels.

Monitoring, sampling, testing and inspections

Has all required sampling, testing and monitoring been taking place (air emissions, groundwater and or soil), subject only to any permitted deviations under the various Alert Levels?

Will ramping-up operations result in increased smoke or emissions in above permitted thresholds?

Have all required internal inspections been taking place to ensure that the facility equipment is working properly (i.e. to ensure that no leaks or overflows are taking place), subject only to any permitted deviations under the various Alert Levels?

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<input type="checkbox"/>	Consider whether monitoring can be achieved without employees being on site.
<input type="checkbox"/>	Have you assessed what kinds of monitoring, sampling etc should be prioritised in the event that difficulties are experienced with regards to resource availability?
Reporting and Record-keeping	
<input type="checkbox"/>	Have mandatory reporting and record-keeping obligations in relation to monitoring been complied with?
<input type="checkbox"/>	Have the results from laboratory testing been delayed, and if so, have you considered what this means from a compliance perspective?
<input type="checkbox"/>	Have safe disposal certificates been received and filed for the disposal of hazardous waste?
<input type="checkbox"/>	Did reporting in terms of the National Atmospheric Emissions Reporting Regulations take place before the extended deadline of 30 April 2020?
<input type="checkbox"/>	Have you assessed your environmental permits to ascertain whether you have any upcoming reporting deadlines that must be actioned and planned for?
<input type="checkbox"/>	Have you checked with your external consultants and laboratories to ensure that they are operational and that necessary reporting can be actioned timeously?
Waste	
<input type="checkbox"/>	Has waste continued to be sorted and managed correctly on site?
<input type="checkbox"/>	Have waste service providers been collecting and disposing of waste during lockdown periods? If not, has waste accumulated beyond allowable limits?
<input type="checkbox"/>	Have waste service providers been required to dispose of waste at different waste management facilities as a result of the closure of or limitations to operational capacity of certain dumps / recycling plants during lockdown? If so, are the new waste management facilities that are being utilised appropriately authorised?
<input type="checkbox"/>	Do you anticipate that additional types or volumes of waste will be generated during ramp-up or as the lockdown eases and has consideration been given to how this waste will be managed? Certain facilities are required to have quarantine facilities that may generate health care risk waste.

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<input type="checkbox"/>	Will ramping up operations generate additional waste-water, and if so, will this discharge breach limits under discharge permits or water use licences?
Water & Sanitation	
<input type="checkbox"/>	Will it be necessary to source additional water to cater for improved sanitation and hygiene measures? If so, where will this water be sourced from and will this be catered for under existing licences, or will new approvals be required to be obtained?
<input type="checkbox"/>	Will additional sanitizers or other chemicals be required to be stored on site? If so, will additional permits be required to be obtained?
Applications	
<input type="checkbox"/>	Will additional infrastructure need to be developed or expanded in order to cater for Covid-19 related requirements, such as the need for dedicated quarantine facilities, improved sanitation and hygiene or the storage of large quantities of sanitisers for employees and cleaning work surfaces?
<input type="checkbox"/>	If so, have you considered what applications will be required to be submitted for amending existing approvals, or obtaining new ones?
<input type="checkbox"/>	Have you considered whether the delay in processing pending applications for environmental licences as a result of lockdown will affect your operations?
<input type="checkbox"/>	Have you checked the validity periods of your environmental approvals? Although the Directions provide for deemed extensions of validity during lockdown, applications to extend the validity period must be submitted to competent authorities timeously.
Environmental Training	
<input type="checkbox"/>	Have your employees missed scheduled environmental training?
<input type="checkbox"/>	Do your existing training programmes need to be revised to accommodate changes brought about by the facility's response to Covid-19, and additional training in this regard rolled out?
Compliance inspections	
<input type="checkbox"/>	Are you ready for inspections from relevant authorities?