



## SASOL SATELLITE OPERATIONS

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# ENVIRONMENTAL AUTHORISATION & ENVIRONMENTAL MANAGEMENT PLAN COMPLIANCE AUDIT REPORT

16/4/4/L/2001/14 - Secunda Interface





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16/4/4/L/2001/14 - Secunda Interface

TYPE OF DOCUMENT (VERSION) CONFIDENTIAL

PROJECT NO. 41106458

OUR REF. NO. 16/4/4/L/2001/14

REPORT NUMBER: A6\_03

DATE: JULY 2024

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# QUALITY CONTROL

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Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Remarks	Draft Audit Report 16.4.4.L.2001.14	Final Audit Report 16.4.4.L.2001.14		
Date	June 2024	July 2024		
Prepared by	Ian Malloy	Ian Malloy		
Signature	-			
Checked by	Marie Schlechter	Ashlea Strong		
Signature	-			
Authorised by	Ashlea Strong	Ashlea Strong		
Signature	-			
Project number	41106458	41106458		
Report number	A6_03	A6_03		
File reference	\\corp.pbwan.net\za\Central_Data\Projects\41100xxx\41106458 - Sasol Reg 34 Audits 2023\41 PA\01-Reports\ROAS_MSP PPS Secunda Interface			



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## **APPENDICES**

### APPENDIX A

#### ENVIRONMENTAL AUTHORISATION SASOL SECUNDA PIPELINE INTERFACE (REFERENCE NO. 16/4/4L/2001/14)

# 1 INTRODUCTION

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## 1.1 TERMS OF REFERENCE

Sasol South Africa Limited, operating through its Secunda Operations (Sasol), appointed WSP Group Africa (Pty) Ltd (WSP) as an independent environmental consultant to undertake a compliance audit and compile an audit report according to the requirements of the National Environmental Management Act (No. 107 of 1998) as amended (NEMA).

This report presents the findings of the compliance audit completed for the Environmental Authorisation (EA) (Reference number: 16/4/4/L/2001/14 issued on 24 December 2001) as well as the associated Operation and Decommissioning Environmental Management Plan (dated: November 2001) and as revised in November 2003, for the period February 2019 to February 2024.

## 1.2 SECUNDA GAS PIPELINE INTERFACE (AUTHORISATION NUMBER: 16/4/4/L/2001/14)

An Environmental Authorisation (reference no. 16/4/4/L/2001/14) for the Secunda Natural Gas Pipeline Interface was issued on 24 December 2001 by the Department of Agriculture, Conservation and Environment, currently the Mpumalanga Department of Agriculture, Rural Development, Land and Environmental Affairs (MDARDLEA), for the construction and operation of the natural gas pipeline interface at the Sasol Secunda Complex (SSC).

Natural gas is transported to Secunda via an underground pipeline with a diameter of 660mm from the gas fields in Mozambique over an estimated distance of 857km. The natural gas pipeline Secunda interface covers the integration of the natural gas pipeline with the SSC within its boundaries (refer to **Figure 1-1**).

The pressure of the gas is reduced prior to entering the SSC. During this phase it is filtered and heated at the Pressure Protection Station (PPS). Downstream of the PPS, the pipeline diameter is reduced to 600mm, prior to entering the SSC on its eastern side from where it will follow existing pipeline racks to Unit 42. At Unit 42, the gas is odourised and thereafter reticulated to Sasol's Secunda facility and its clients.

The SSC (including the PPS) consists of the following:

- A pig receiver;
- A shut down valve;
- Two (2) filters to remove dust particles;
- Two (2) flow meters;
- A gas heating system that will counteract the Joule-Thompson effect that occurs when pressure in the pipeline is reduced; and
- Pressure control valves with an independent shut valve.

Construction of the Secunda interface was completed in 2004, therefore, any construction related conditions are considered not relevant to the current audit period.

**Figure 1-1** provides an overview of the location of the facility.



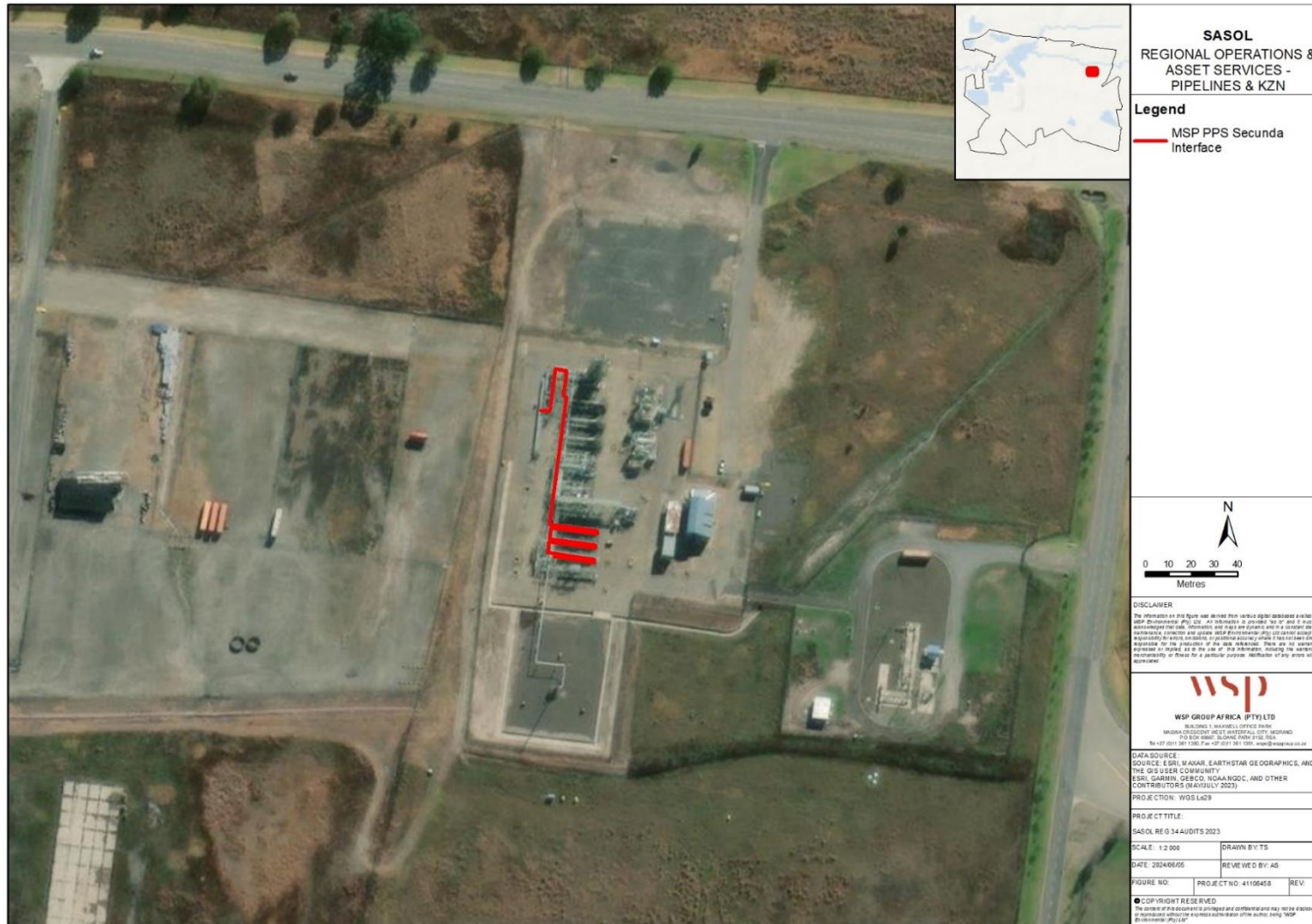


Figure 1-1: Location and extent of MSP PPS Secunda Interface



## 2 AUDIT SCOPE

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The 7 April 2017 amendment to the Environmental Impact Assessment (EIA) regulations introduced the requirement for the auditing for all EAs and EMPs in effect on 8 December 2014 and submission of audit reports to the Department of Forestry, Fisheries and the Environment (DFFE) every five years. This audit is designed to meet the requirements of Regulation 34 of the EIA Regulations, 2014, as amended.

The audit period runs from February 2019 to February 2024, therefore any construction related conditions are considered outside audit period and therefore not applicable.

The objective of the audit was to:

- Assess the level of compliance with the conditions of the EA and EMP;
- Assess the extent to which the avoidance, management and mitigation measures provided for in the EMP, achieve the objectives and outcomes laid out in these documents;
- Identify and assess any new impacts and risks that result from undertaking the activity;
- Critically evaluate the effectiveness of the EMP;
- Identify shortcomings in the EMP;
- Identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMP;
- Make recommendations in order to achieve compliance in terms of the EA and EMP.

### 3 AUDIT METHODOLOGY

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The compliance audit was conducted in a systematic and independent manner that was documented and objectively evaluated to determine compliance to the EA and EMPr conditions. The audit process comprised the following:

- Request and collection of information prior to the audit;
- Confirmation of the audit checklist;
- Site inspection (25 April 2024);
- Review of documentation relevant to the conditions of the EA and EMPr (e.g. records, permits/certificates/maintenance logs/monitoring results/previous reports etc.); and
- Compilation of an audit report.

#### 3.1 AUDIT CHECKLIST

WSP compiled an audit checklist to assist with the EA compliance audit (Section 4).

#### 3.2 SITE INSPECTION

WSP auditor, Ian Malloy, conducted the site inspection on 25 April 2024. The findings and observations of the site visit are recorded and summarised in Section 4 with evidence included in **Table 4-1** and **Table 4-2**. The audit consisted of a site walkover and discussions with the abovementioned Sasol Representatives. Key personnel interviewed included:

- Sasol Environmental Specialist - Broni van der Meer;
- Sasol Environmental Manager - Ilze Swanepoel;
- ROAS Komatipoort – Area Manager - Frank Mzinyane;
- ROAS Nelspruit – Foreman - Julius Mthethwa;
- Secunda PPS Interface Production Foreman – Christo Van Zyl.

#### 3.3 DOCUMENTATION CONSIDERED

The following documentation was provided and considered:

- Authorisation to undertake a Listed Activity in terms of Section 22 of the Environment Conservation Act, 1989 (Act 73 of 1989), Sasol Gas Pipeline Interface Project at the Sasol Complex in Secunda, December 2001
- Procedure: Emergency Preparedness, Secunda Complex, CGR-SHE-000002, Rev 09, Sasol, November 2021 (valid until 1 November 2026)
- Procedure: Sasol Secunda On-Site Works Emergency Procedure, CGR-SHE-000048, Rev 07, Sasol, December 2021 (valid until 02 December 2026)
- Procedure: Management of Environmental Incidents and Noncompliance Events, Secunda Operation (SO), EOSO-PR-3970, Version 01, Sasol SHE, 20 June 2023, (valid until 30 June 2026)
- ROAS environmental incident register
- Sasol SA (Pty) Ltd Secunda Operations, ISO 9001:2015 Quality Management System Certificate, DQS GmbH, February 2022 (valid until February 2025)
- Sasol SA (Pty) Ltd Secunda Operations, ISO 14001:2015 Environmental Management System Certificate, DQS GmbH, February 2022 (valid until February 2025)



- Sasol SA (Pty) Ltd Secunda Operations, ISO 45001:2018 Occupational Health and Safety Management System Certificate, DQS GmbH, February 2022 (valid until February 2025)
- Sasol SA (Pty) Ltd ISO 14001:2015, ISO9001:2015: ISO45001:2028 Assessment Report, BSI, January 2023
- Sasol – Regional Operations and Asset, Environmental Management System – ISO 14001:2015 Certificate of Registration, including MSP and ROMPCO operations RSA, BSI, October 2022 (valid until December 2024)
- Sasol – Regional Operations and Asset, Occupational Health and Safety Management System – ISO 45001:2018 Certificate of Registration, including MSP and ROMPCO operations RSA, BSI, October 2022 (valid until December 2024)
- Sasol – Regional Operations and Asset, Quality Management System – ISO 9001:2015 Certificate of Registration, including MSP and ROMPCO operations RSA, BSI, October 2022 (valid until December 2024)
- Procedure: Quality Management Manual, Secunda Operation (SO), CGR-HYG-000001, Revision 04, Sasol South Africa (Pty) Ltd, April 2021, (valid until April 2024)
- Process Safety, EOSO-SA-0059 HAZAOP Noting Form, Sasol Secunda site procedure for HAZOP studies, EOSO-WI-0173
- ROAS Pipeline and KZN Wax Operations Risk Assessment and Management, June 2022
- Environmental Risk Assessment, Attendance Register, Sasol Secunda Industrial Complex, June 2020
- Work instruction: Security access control requirements, CGI-SHE-000011, Revision 06, Sasol Secunda Complex, February 2016
- Work instruction: Security access control requirements, CGI-SHE-000011, Revision 07, Sasol Secunda Complex, undated (valid until May 2029)
- Training Material - Sasol SHE Induction Module 2: Security
- Training Material - Sasol SHE Induction Module 3: Environment
- Training Material - Sasol SHE Induction Module 4: Process Safety Management
- Training Material - Sasol SHE Induction Module 5: Workplace Safety
- Training Material - Sasol SHE Induction Module 6: Emergency management
- Integrated Water and Waste Management Plan (IWWMP), Revision: Draft 3, Sasol South Africa Ltd, Secunda Industrial Complex, Mpumalanga, 2021 – 2025
- Annual update of the IWWMP 2020-2025 Action Plan sent to Department of Water and Sanitation, Sasol Secunda Industrial Complex (SIC), April 2023
- Sasol Secunda Operations, ROAS Pipeline Organogram, 2024
- Sasol Secunda Operations, SHE Team, Organogram, January 2024
- Secunda Operations, SHE Air, Organogram, January 2024
- Waste Management Plan (WMP), Risk, Reporting, Incident and Assurance Register, Sasol, March 2024
- Sasol Secunda Operations, Komatipoort and Nelspruit, Waste inventory for operations and workshops, SAS-490, Revision 4, March 2023
- Sasol Secunda Operations, Komatipoort and Nelspruit, Waste inventory for operations and workshops, SAS-490, Revision 4, December 2023
- Sasol Secunda Operations, Komatipoort and Nelspruit, Waste inventory for operations and workshops, SAS-490, Revision 4, January 2024
- SASOL, SHE Training, Area Specific SHE Training, and Technical Training Registers, 2024



- Sasol Gas, Legal Compliance Framework, MSP Operations, Environmental Legal Register, October 2003
- Process Maintenance Training Registers;
- Environmental Complaints Register, RACI
- Complaints template, Revision 05, SGR-SHE-000022, May 2019
- Sasol Satellite Operations Pipeline Operations, Environmental Performance Report, February 2015 – July 2015, Report Number 8, December 2015
- Sasol Secunda Waste Management Plan (WMP) 2023, Secunda Operations, Sasol SHE Department, 2023
- Letter: Submission of Sasol Secunda Operations Waste Management Plan to the Department of Forestry, Fisheries and Environment, January 2024
- Sasol ROAS Secunda to Komatipoort Pipeline Maintenance Schedule and Tracker, 2024
- Sasol ROAS Secunda to Komatipoort Pipeline Strategy Work Schedule and Tracker, 2024
- International Code of Practice: ASME B31.8c, Mozambique Secunda Pipeline, undated.
- Sasol, Application for Exemption: Mozambique to Secunda Pipeline - Secunda Factory Interface Project, October 2000.
- Sasol Natural Gas Tie In Aspect Register, 2002 - 2003
- Sasol Natural Gas Tie In Construction Schedule and Tracker, 2003
- Sasol Natural Gas Conversion Project Draft, May 2001
- Sasol Internal Scoping Document, Environmental Impact Assessment (EIA), Appendix A, August 1998
- Sasol Gas Supply Project, Environmental Management Plan, Part 3 – Operation and Decommissioning, Mark Wood Consultants, November 2001,
- Pipeline Safety Awareness Presentation (KaMgewana), Sasol, 19 October 2023;
- Attendance Registers for Pipeline Safety Awareness Session (KaMgewana), Sasol, 19 October 2023;
- Pipeline Safety Awareness Presentation (eMalahleni), Sasol, 15 November 2023;
- Attendance Registers for Pipeline Safety Awareness Session (eMalahleni), Sasol, 15 November 2023;
- Sasol Secunda Operations, Standard Operating Procedure: U350, Pressure Protection System, SGR-SOP-000325, Revision 01 valid until February 2024 and developed in February 2021
- Sasol Satellite Operations, ROMPCO Operations Presentation.
- Sasol online complaints register listing all complaints received, 2024.

### 3.4 AUDIT COMPLIANCE ASSESSMENT

WSP utilised a pre-prepared audit checklist to assist with the audit execution (**Table 4-1** and **Table 4-2**). The checklist included the conditions and associated requirements as specified in the EA and associated EMPr.

Each condition was verified, either by reviewing documentation, interviewing employees and/or visually inspecting the facility. Each condition was rated in accordance with **Table 3-1** below, and recommendations with associated target completion dates included.

It should be noted that some of the EA and EMPr conditions were apportioned according to the elements requiring compliance assessment therein. Although some elements of the condition may have been compliant, if one of the elements was determined to be non-compliant, the entire condition has been reported as such (and counted as such during percentage compliance

calculation). This apportionment further allowed for the development of focussed recommendations and timeframes.

**Table 3-1 - Compliance Level Definition and Target Completion Dates**

Compliance Level	Definition
<b>Compliant (C)</b>	Sasol could provide evidence for compliance with the commitment and condition and/or where relevant actions were implemented.
<b>Non-compliant (NC)</b>	Specified commitments, conditions and documents were not in place or implemented according to the requirements of the EA. Non-complaint conditions are given target completion dates, as follows: <ul style="list-style-type: none"> <li>■ Short term: 0 – 6 months.</li> <li>■ Medium term: 6 – 12 months.</li> <li>■ Long term: 12 – 18 months.</li> </ul>
<b>Not applicable (N/A)</b>	These are commitments are either not required yet or not applicable to Sasol. Conditions marked as “Noted” are considered information points only. Where conditions are considered “not auditable” within the scope of this assessment this is stated and explained within the condition commentary.

Refer to **Section 4** for the detailed audit findings (including evidence, recommendations and target completion dates).

### 3.5 AUDIT TEAM

The auditor, Ian Malloy, was hosted by Sasol Representatives, Broni van der Meer, Ilze Swanepoel, Frank Mzinyane, Julius Mthethwa and Christo Van Zyl to whom we express our gratitude for their time and attention during our visit. A brief summary of the external auditors’ experience is provided below.

■ **Lead Auditor: Ian Malloy**

Ian graduated from the University of Stellenbosch with a BEng in Chemical Engineering in 2016 and a BEng Hons in Environmental Engineering in 2019. He is currently completing a MEng in Water Engineering. Ian has eleven years of working experience as an Environmental Consultant specialising in waste planning, environmental management and auditing, and environmental engineering. Ian has been involved in numerous waste and water management, and construction related projects in South Africa. The projects completed include EAs, Water Use Licence (WUL) and Waste Management Licence (WML) Applications, EA and EMPr amendment processes, developing IWMPs for District and Local Municipalities, developing EMPrs, conducting environmental compliance audits of EAs, EMPrs, and WMLs, conducting GRAP 17 and 19 assessments of landfill sites, and sampling and monitoring of groundwater and marine water.

■ **Project Manager and Quality Assurance: Ashlea Strong**

Ashlea is a Principal Associate with 21 years’ experience in the environmental field. She currently provides technical and strategic expertise on a diverse range project in the environmental management field, including environmental scoping and impact assessment studies, environmental management plans, waste and water management, as well as the provision of environmental management solutions and mitigation measures. Ashlea has been



involved in the management of a number of large EIAs specifically within the energy sector such as the Medupi Power Station, and Pebble-Bed Modular Reactor (PBMR) and numerous Renewable Energy Developments and Transmission Powerlines. She also has significant environmental auditing experience and expertise having undertaken over 70 compliance audits. Ashlea holds a Masters in Environmental Management; a BTech (Nature Conservation), and a National Diploma (Nature Conservation). She is also a Registered Environmental Assessment Practitioner.

■ **Quality Assurance: Marié Schlechter**

Marié Schlechter has worked in the mining industry and environmental consultancy for over twenty-three years, gaining experience in the implementation of environmental management systems and mitigation of environmental impacts from mining and industrial activities. Marié has experience in managing environmental impacts on mining and industrial sites as well as the implementation, maintenance and internal auditing of environmental management systems and compliance audits. Marié is a registered Environmental Assessment Practitioner and has ICMI registration as a Lead and Mining Technical Expert Auditor as well as an Affiliate Member and Registered Environmental Auditor with the Institute of Environmental Management and Assessment (IEMA). She has conducted audits in South Africa, Mali, Guinea, Ghana, Tanzania, Mozambique, Mauritania and Finland.

## 3.6 ASSUMPTIONS AND LIMITATIONS

This Report has been prepared by WSP on behalf and at the request of Sasol, to provide the Client an understanding of the Relevant Documents.

Unless otherwise agreed by us in writing, we do not accept responsibility or legal liability to any person other than the Client for the contents of, or any omissions from, this Report.

To prepare this Report, we have reviewed only the documents and information provided to us by the Client or any third parties directed to provide information and documents to us by the Client. We have not reviewed any other documents in relation to this Report and except where otherwise indicated in the Report.

The findings, recommendations and conclusions given in this report are based on the author's best scientific and professional knowledge, as well as available information. This report is based on survey and assessment techniques which are limited by time and budgetary constraints relevant to the type and level of investigation undertaken; WSP and its staff reserve the right to modify aspects of the report including the recommendations if and when new information may become available from on-going research or further work in this field, or pertaining to this investigation.

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This report must not be altered or added to without the prior written consent of the author. This also refers to electronic copies of this report which are supplied for the purposes of inclusion as part of other reports. Similarly, any recommendations, statements or conclusions drawn from or based on this report must make reference to this report. If this report is used as part of a main





report, the report in its entirety must be included as an appendix or separate section to the main report.

## 4 AUDIT FINDINGS


**Table 4-1 - Audit Findings – Environmental Authorisation**

Ref:	Commitment	Compliance	Finding	Recommendation
<b>CONDITIONS</b>				
<b>1. General Conditions</b>				
1.1	This authorisation refers only to the project specified above and described in the Record of Decision, hereafter referred to as "the interface project" or development". Separate applications for authorisation or exemption must be lodged for any other development and/or activity at or near the proposed development, which is covered by Section 21 and 22 of the Act and Government notice R1182 and R1183 of 5 September 1997.	N/A	The condition is noted by Sasol.	None.
1.2	Authorisation is only granted in terms of Section 22 of the Environment Conservation Act 1969 (Act 73 of 1989) and does not exempt the holder from compliance with any other relevant legislation.	N/A	The condition is noted by Sasol.  A full legal review does not form part of the scope of this audit.  Sasol operates with a dedicated environmental and legal team, and therefore ensures that they comply with applicable legislation.	None.
1.3	No development may take place on the area of concern without the necessary permits/approvals and/or service agreements, where it is relevant, from or between all other relevant authorities. These authorities include, but may not be limited to the following:	N/A	The condition is noted by Sasol and was implemented prior to construction and operation of the Secunda Interface.	None.

Ref:	Commitment	Compliance	Finding	Recommendation
1.3.1	The relevant Local Council.	N/A	The condition is noted by Sasol and was implemented prior to construction and operation of the Secunda Interface.	None.
1.3.2	Department of Water Affairs & Forestry.	N/A	The condition is noted by Sasol and was implemented prior to construction and operation of the Secunda Interface.	None.
1.3.3	Chief Air Pollution Control Officer	N/A	The condition is noted by Sasol and was implemented prior to construction and operation of the Secunda Interface.	None.
1.4	Copies of the relevant permits/approvals and/or service agreements must be forwarded to this Department for record keeping purposes.	N/A	The condition is noted by Sasol and was implemented prior to construction and operation of the Secunda Interface.	None.
1.5	This Department may add to, change and/or amend any of the conditions in this authorisation in terms of Section 31A(b) of the Environment Conservation Act (Act 73 of 1989) and/or Section 28(4) of the National Environmental Management Act (Act 107 of 1998) if, in the opinion of the Department, it is environmentally justified and after consulting with the relevant parties involved.	N/A	The condition is noted by Sasol. The Department has not changed or amended any conditions within the EA.	None.
1.6	Control and mitigation measures specified in all the relevant documentation submitted to the Department as part of the application for authorisation, must be strictly adhered to.	C	<p>Internal audits of the Secunda Interface were conducted to determine whether control and mitigation measures are implemented on site.</p> <p>The current audit is the first external audit conducted at the Secunda Interface, to date.</p> <p><u>Evidence:</u></p>	None.

Ref:	Commitment	Compliance	Finding	Recommendation
			<ul style="list-style-type: none"> <li>Sasol electronic checklists and internal audits, 2024.</li> </ul>	
<b>2</b>	<b>Establishment</b>			
2.1	This authorisation is repealed if the project has not commenced within two (2) years from the date of this authorisation.	N/A	This condition is considered outside of the audit period. It is therefore considered not applicable.	None.
2.2	If any changes need to be made to the design of the interface project, this Department must be informed thirty (30) days in advance, to be able to decide whether the changes need authorisation.	N/A	No design changes were made to the interface project since construction was completed. This condition is therefore considered not applicable.	None.
<b>3. Construction and Operation</b>				
3.1	No construction or raw materials should be stored within any area where runoff water might reasonably be expected to pass through.	C	It was observed during the site assessment that no raw materials are stored in an area that would be in contact with surface or runoff water.	None.
3.2	The pollution of adjacent areas due to improper storage of construction and/or raw materials as well as other hazardous substances should be prevented.	C	No pollution is caused by adjacent areas on site. The site is designed to mitigate inflow of surface water from adjacent areas.	None.
3.3	Sufficient steps must be taken to prevent soil pollution through oil spillage.	C	<p>Measures are taken on site to prevent soil pollution and staff are trained to prevent oil and fuel spillages on site. No soil pollution incidents were recorded in the environmental incident register during the current audit period.</p> <p><u>Evidence:</u></p>	

Ref:	Commitment	Compliance	Finding	Recommendation
			<ul style="list-style-type: none"> <li>Incident Register 2020 - 2024, Sasol</li> <li>Procedure: Emergency Preparedness, Secunda Complex, CGR-SHE-000002, Rev 09, Sasol, November 2021 (valid until 1 November 2026)</li> <li>Training Material - Sasol SHE Induction Module 3: Environment</li> <li>Training Material - Sasol SHE Induction Module 4: Process Safety Management</li> <li>SSO, Komatipoort and Nelspruit, Waste inventory for operations and workshops, SAS-490, Revision 4, January 2024</li> <li>SASOL SHE Training, Area Specific SHE Training, and Technical Training Registers, 2024</li> </ul>	
3.4	Sufficient provision must be made in the contractor's budget for the mitigation of environmental impacts during the construction period.	N/A	This condition is considered outside of the audit period. It is therefore considered not applicable.	
3.5	Fill material should only be obtained from a registered borrow pit if and when such fill material is required.	N/A	This condition is considered outside of the audit period. It is therefore considered not applicable.	
3.6	The following conditions relates to the sections of the interface pipeline that will be routed underground:	N/A	This condition is considered outside of the audit period. It is therefore considered not applicable.	
3.6.1	Appropriate soil erosion prevention measures must be taken along the pipeline corridor.	C	<p>Appropriate soil erosion measures were undertaken and maintained in the pipeline corridor.</p> <p><u>Evidence:</u></p>	

Ref:	Commitment	Compliance	Finding	Recommendation
			<ul style="list-style-type: none"> <li>Process Maintenance Training Material and Registers; undated</li> <li>Sasol ROAS Secunda to Komatipoort Pipeline Maintenance Schedule and Tracker, 2024</li> <li>Sasol ROAS Secunda to Komatipoort Pipeline Strategy Work Schedule and Tracker, 2024</li> </ul>	
3.6.2	Topsoil must be removed and stored separately from subsoil in specifically designated areas.	N/A	This condition is considered outside of the audit period. It is therefore considered not applicable.	
3.6.3	After compaction the disturbed surface should be at the same level as the adjacent area, to avoid accumulation of water run-off and erosion resulting from it.	C	<p>All ground surfaces on site are at the same level and no slumping of the soil was identified.</p> <p><u>Evidence:</u></p> 	
3.6.4	Weed control measures must be implemented.	C	No weeds were identified on site and continuous housekeeping is conducted on site.	



Ref:	Commitment	Compliance	Finding	Recommendation
			<u>Evidence:</u> 	
3.7	Adequate ablution facilities must be provided for construction workers through the use of chemical toilets.	N/A	This condition is considered outside of the audit period as it refers to provision of chemical toilets for construction workers. It is therefore considered not applicable.	
<b>4. Water Pollution</b>				
4.1	Water pollution must be prevented as far as possible and no chemicals or waste associated with the interface project may be allowed to pollute the soil, the surrounding area or any open or underground water.	C	<p>No visible water pollution was noted on site or recorded in the environmental incident register during the current audit period.</p> <p><u>Evidence:</u></p> <ul style="list-style-type: none"> <li>Incident Register 2020 - 2024, Sasol</li> </ul>	
<b>5. Waste</b>				
5.1	All waste generated during construction and operation of the interface project shall be stored and handled in an environmentally acceptable way and	C	Waste generated during operation is managed according to SSO's Waste Management Plan (WMP) and according to the requirements of the National	

Ref:	Commitment	Compliance	Finding	Recommendation
	as directed by this Department or any other relevant authority.		<p>Environmental Management Waste Act (NEM:WA). This WMP was sent to the DFFE for approval in January 2024. Waste generated on site is stored and handled in an environmental acceptable manner.</p> <p><u>Evidence:</u></p> <ul style="list-style-type: none"> <li>Integrated Water and Waste Management Plan, Revision: Draft 3, Sasol South Africa Ltd, Secunda Industrial Complex, Mpumalanga, 2021 – 2025,</li> <li>Sasol Secunda Waste Management Plan 2023, Secunda Operations, Sasol SHE Department, 2023</li> <li>Letter: Submission of Sasol Secunda Operations Waste Management Plan to the Department of Forestry, Fisheries and Environment, January 2024</li> <li>Sasol Secunda Operations, Komatipoort and Nelspruit, Waste inventory for operations and workshops, SAS-490, Revision 4, January 2024</li> </ul>	
5.2	All waste generated during construction and operation of the interface project shall be disposed of at an approved waste site that is permitted to handle the relevant types of waste.	C	<p>Waste generated during operation is disposed of as per SSO's WMP and in compliance with the requirements of the NEM:WA. This WMP was sent to the DFFE for approval in January 2024.</p> <p>General and hazardous waste are disposed of at licenced landfill sites, designated for each waste type. Waste manifests are maintained and recorded by Sasol.</p> <p><u>Evidence:</u></p>	

Ref:	Commitment	Compliance	Finding	Recommendation
			<ul style="list-style-type: none"> <li>Sasol Secunda Operations, Komatipoort and Nelspruit, Waste inventory for operations and workshops, SAS-490, Revision 4, 2023 and 2024</li> <li>Waste management plan, Risk, Reporting, Incident and Assurance Register, Sasol, March 2024.</li> </ul>	
5.3	Stripped topsoil must be used at the borrow pits for rehabilitation purposes as stipulated in the identification of potential environmental impacts.	N/A	This condition is considered outside of the audit period. It is therefore considered not applicable.	
<b>6. Monitoring</b>				
6.1	All the relevant conditions for the monitoring of the pipeline and the transportation of natural gas from Malelane to Secunda in its entirety, as specified in the pipeline Environmental Management Plan (EMP) and conditions of approval stipulated in the authorisation that is to be issued by the National Department of Environmental Affairs and Tourism (NDEA&T) must be adhered to.	C	<p>The monitoring conditions for the natural gas pipeline from Malelane to Secunda is conducted according to the EA and EMPr that was issued and authorised for the pipeline. Furthermore, an external compliance audit of the EA and EMPr for the pipeline was conducted during April 2024.</p> <p><u>Evidence:</u></p> <ul style="list-style-type: none"> <li>A24/16/3/149 Secunda to Komatipoort Underground Natural Gas Pipeline External Audit Report, April 2024</li> <li>Sasol ROAS Secunda to Komatipoort Pipeline Maintenance Schedule and Tracker, 2024</li> <li>Sasol ROAS Secunda to Komatipoort Pipeline Strategy Work Schedule and Tracker, 2024.</li> </ul>	

Ref:	Commitment	Compliance	Finding	Recommendation
<b>7. Environmental Management</b>				
7.1	All the relevant conditional requirements relating to the implementation of EMP procedures in the management of environmental impacts associated with the interface project as stipulated in the authorisation referred to above, must be implemented and adhered to.	C	<p>The conditions of the EMPr are included in Sasol's operational, management and monitoring work schedules of the Secunda Interface.</p> <p>Furthermore, these conditions are included in the current external compliance audit of the Secunda Interface.</p> <p><u>Evidence:</u></p> <ul style="list-style-type: none"> <li>■ Sasol ROAS Secunda to Komatipoort Pipeline Strategy Work Schedule and Tracker, 2024.</li> </ul>	
<b>8. Reporting</b>				
8.1	Records relating to the compliance/non-compliance with the conditions of the Exemption must be kept in good order. Such records must be made available to this Department within seven (7) workdays of the date on a written request by this Department for such records.	C	<p>Records are maintained by Sasol to indicate compliance with the conditions of the EA and the EMPr. Records were not requested by the Department in the audit period.</p> <p><u>Evidence:</u></p> <ul style="list-style-type: none"> <li>■ Refer to Section 3.3.</li> </ul>	
8.2	Non-compliance with, or any deviation from the conditions as set out in this authorisation, is regarded as an offence and after reasonable provision has been made for remedial action, will be dealt with in terms of Section 29, 30 and 31A of the Act.	N/A	This condition is noted by Sasol. Zero non-conformances (NCs) were noted during the current external audit for the audit period, 2019 - 2024.	

Ref:	Commitment	Compliance	Finding	Recommendation
8.3	Any concerns raised by interested and affected parties should be investigated and addressed to the satisfaction of this Department.	N/A	<p>No concerns were raised by interested and affected parties or the public during the current audit period.</p> <p><u>Evidence:</u></p> <ul style="list-style-type: none"> <li>Complaints template, Revision 05, SGR-SHE-000022, May 2019</li> <li>Sasol online complaints register listing all complaints received, 2024.</li> </ul>	
8.4	Any complaints regarding the said development must be brought to the attention of this office within 24 hours after receiving the complaint. A complaints register must be kept up to date for inspection by members of the Department.	C	<p>A complaints register is maintained by SSO. No complaints were raised during the current audit period.</p> <p><u>Evidence:</u></p> <ul style="list-style-type: none"> <li>Complaints template, Revision 05, SGR-SHE-000022, May 2019</li> <li>Sasol online complaints register listing all complaints received, 2024.</li> </ul>	

**Table 4-2 - Audit Findings – Operational Environmental Management Programme**

	Management Measure	Compliance	Finding	Recommendation
1	<b>Legal Requirements and Standards</b>			
1.1	Sasol shall comply with the requirements of the Major Hazards Installation (MHI) regulations under the Occupational Health and Safety Act (Act 85 of 1993).	C	The recommendations of the major hazard installation risk assessor are applied by Sasol's management processes and procedures.	None.

	Management Measure	Compliance	Finding	Recommendation
			<u>Evidence:</u> <ul style="list-style-type: none"> <li>Process Safety, EOSO-SA-0059 HAZAOP Noting Form, Sasol Secunda site procedure for HAZOP studies, EOSO-WI-0173.</li> <li>ROAS Pipeline and KZN Wax Operations Risk Assessment and Management, June 2022</li> <li>Environmental Risk Assessment, Attendance Register, Sasol Secunda Industrial Complex, June 2020.</li> <li>Satellite Operations – Maintenance Philosophy For Transmission Pipeline Document number: SAT – PMAIN – PROC – 209 Rev003”, dated December 2016.</li> </ul>	
1.2	Sasol shall operate the pipeline in accordance with the standards of a recognised international Code of Practice for the Operation and Maintenance of High-Pressure Gas Pipelines, such as the American Society of Mechanical Engineers (ASME) Code B31.8.	C	Sasol operates the pipeline according to the American Society of Mechanical Engineers (ASME) Code B31.8 as detailed in the document: “Satellite Operations – Maintenance Philosophy for Transmission Pipeline Document number: SAT – PMAIN – PROC – 209 Rev003”.	None.
1.3	Sasol shall implement a recognised environmental management system for the project, supporting the principles of the ISO 14001 environmental standard for the management of environmental impacts associated with the operation of the pipeline.	C	Sasol has been certified in accordance with the requirements of ISO14001:2015 . Therefore, the site is operated under an Environmental Management System (EMS). Furthermore, Sasol undergoes annual system audits and maintains their certification for the various ISO standards. The 2023 ISO 14001 audit report was provided for review.	None.



	Management Measure	Compliance	Finding	Recommendation
			<u>Evidence:</u> <ul style="list-style-type: none"> <li>Sasol SA (Pty) Ltd ISO 14001:2015, ISO9001:2015: ISO45001:2028 Assessment Report, BSI, January 2023</li> <li>Sasol SA (Pty) Ltd Secunda Operations, ISO 14001:2015 Environmental Management System Certificate, DQS GmbH, February 2022 (valid until February 2025)</li> <li>Sasol – Regional Operations and Asset, Environmental Management System – ISO 14001:2015 Certificate of Registration, including MSP and ROMPCO operations RSA, BSI, October 2022 (valid until December 2024)</li> </ul>	
<b>2</b>	<b>Liaison with Local Authorities</b>			
2.1	<p>Sasol shall extend the contact already made with representatives of the affected local authorities along the pipeline route in order to:</p> <ul style="list-style-type: none"> <li>a) provide them with details of the change taking place;</li> <li>b) inform them of the final pipeline route alignment and show this on a map;</li> <li>c) define agreed servitudes;</li> <li>d) provide them with a contact point telephone number (24 hour);</li> <li>e) discuss any land-use planning issues (see below for specific constraints); and</li> </ul>	<b>C</b>	<p>This action occurred prior to the commencement of construction. Sasol continues to be in communication with the authorities and stakeholders affected by the pipeline to ensure that there is no communication barrier as the pipeline is an asset of national importance as well as Sasol's economic importance. Maintenance work required for the pipeline is also communicated to affected stakeholders timeously.</p> <p>An example of public sessions held by Sasol for pipeline safety awareness on 19 October 2023 and 11 November 2023 were provided.</p>	None.

	Management Measure	Compliance	Finding	Recommendation
	f) discuss with them the updated risk assessment and its relevance to the areas under the local authority's jurisdiction.		<u>Evidence:</u> <ul style="list-style-type: none"> <li>Attendance Registers for Pipeline Safety Awareness Session, 15 November 2023;</li> <li>Attendance Registers for Pipeline Safety Awareness Session, 19 October 2023;</li> <li>Pipeline Safety Awareness Presentation eMalahleni, 15 November 2023; and,</li> <li>Pipeline Safety Awareness Presentation eMalahleni 19 October 2023.</li> </ul>	
<b>3</b>	<b>Compliance with MHI Regulations</b>			
3.1	Sasol shall prepare an analysis of social risk in the areas of local authority jurisdiction based on actual population density and land use planning information taken from the aerial photography flown for the project and from information provided by these authorities;	N/A	This condition relates to the natural gas pipeline and not the interface to the SSC. The SSC existed prior to construction of the natural gas pipeline interface and this facility was developed within the boundary of the SSC. There is therefore no social risk associated with the Secunda natural gas pipeline interface.	
3.2	Sasol shall review specialist geo-technical reports prepared for the pipeline river crossings and undermined areas and existing servitude crossings (Eskom, road and rail) with regard to acceptable risk and shall update the risk assessment prepared for the EIA in accordance with this information in order to ensure that the design of the pipeline meets acceptable international risk criteria;	N/A	This condition relates to the construction phase and is considered outside of the audit period. It is therefore considered not applicable.	None.
3.3	Sasol shall include any necessary measures in the pipeline design to reduce impacts at areas of greater risk;	N/A	This condition relates to the construction phase and is considered outside of the audit period. It is therefore considered not applicable.	None.

	Management Measure	Compliance	Finding	Recommendation
3.4	Sasol shall place an advertisement calling for comment in a local newspaper in each of the local authorities through which the pipeline is routed, in accordance with the standard.	N/A	This condition relates to the construction phase and is considered outside of the audit period. It is therefore considered not applicable.	None.
3.5	Sasol shall submit the above analysis to the affected local authorities, together with any other information required, in fulfilment of the requirement for the preparation of a risk assessment in terms of Major Hazard Installation regulations under the Occupational Health and Safety Act (Act 85 of 1993).	N/A	This condition relates to the construction phase and is considered outside of the audit period. It is therefore considered not applicable.	None.
4	Pipeline Maintenance			
4.1	<p>Sasol shall prepare a Maintenance Plan for the operation of the pipeline. This plan shall meet the requirements of ASME B31.8 and shall include, but not be limited to, the following:</p> <p>(a). detailed instructions for employees covering maintenance procedures for the pipeline during normal operations and repairs.</p> <p>(b). details of pipeline surveillance requirements including methods, personnel frequency and record keeping.</p> <p>(c). particular reference to those portions of the pipeline presenting the greatest hazard to the public in the event of an emergency or because of construction or extraordinary maintenance requirements.</p> <p>(d). procedures for monitoring of the pipeline for evidence of accelerated erosion or invasion of the servitude by noxious weeds during the rehabilitation period.</p>	C	<p>Sasol compiled and implemented a maintenance plan and schedule which includes these requirements outlined in the EMP.</p> <p><u>Evidence:</u></p> <ul style="list-style-type: none"> <li>■ Satellite Operations – Maintenance Philosophy for Transmission Pipeline Document number: SAT – PMAIN – PROC – 209 Rev003, as adopted on 18 December 2016</li> <li>■ ROAS Pipeline and KZN Wax Operations Risk Assessment and Management, June 2022</li> <li>■ Sasol ROAS Secunda to Komatipoort Pipeline Maintenance Schedule and Tracker, 2024</li> <li>■ Sasol ROAS Secunda to Komatipoort Pipeline Strategy Work Schedule and Tracker, 2024</li> </ul>	None.

	Management Measure	Compliance	Finding	Recommendation
			<ul style="list-style-type: none"> <li>International code of practice: ASME B31.8c, MSP, undated</li> <li>Process Maintenance Training Registers; 2024.</li> </ul>	
<b>5</b>	<b>Emergency Preparedness</b>			
5.1	<p>Sasol shall establish an Emergency Plan that will govern all activities related to the response to an emergency. The plan shall:</p> <p>(a) establish a system for receiving, identifying and classifying emergencies which require immediate response by the operating company;</p> <p>(b) identify emergency response authorities along the route, with all emergency contact details and the procedures necessary to ensure rapid and effective response from these authorities.</p> <p>(c) Identify emergency response resources, including specialised equipment and materials, to be deployed to assist emergency response authorities in the case of an accident.</p> <p>(d) establish a procedure to ensure prompt and adequate handling of all calls which concern emergencies whether they are from customers, the public, company employees, or other sources.</p> <p>(e) establish a procedure to ensure the prompt and effective response to a notice of each type of emergency including the action to be taken by all personnel involved and the first employee at the scene;</p>	<b>C</b>	<p>Sasol compiled, adopted and implemented the following Emergency Plan documents:</p> <ul style="list-style-type: none"> <li>Satellite Operations – Emergency Management Procedure Document number: SAT – POPER – PROC – 001 Rev05, and</li> <li>Satellite Operations –Secunda-Natref Integration (SNI) Pipeline Emergency Response Plan Document number: SAT – PPROD – PROC – 22 Rev03.</li> <li>Work instruction: Security access control requirements, CGI-SHE-000011, Revision 07, Sasol Secunda Complex, undated (valid until May 2029)</li> <li>Procedure: Emergency Preparedness, Secunda Complex, CGR-SHE-000002, Rev 09, Sasol, November 2021 (valid until 1 November 2026)</li> <li>Procedure: Sasol Secunda On-Site Works Emergency Procedure, CGR-SHE-000048, Rev 07, Sasol, December 2021 (valid until 02 December 2026)</li> <li>Training Material - Sasol SHE Induction Module 3: Environment</li> <li>Training Material - Sasol SHE Induction Module 4: Process Safety Management</li> </ul>	None.

	Management Measure	Compliance	Finding	Recommendation
	<p>(f) indicate clearly the responsibility for training employees to respond effectively and in accordance with the emergency procedures;</p> <p>(g) indicate clearly those responsible for updating the information contained in the Emergency Plan;</p> <p>(h) establish a procedure for responding to community and media enquiries and to the disseminate information to the public;</p> <p>(i) establish reporting procedures for documenting an emergency</p>		<ul style="list-style-type: none"> <li>Training Material - Sasol SHE Induction Module 6: Emergency management</li> <li>SHE Training, Area Specific SHE Training, and Technical Training Registers, 2024</li> </ul> <p>It was confirmed that these documents include the outlined conditions.</p>	
5.2	Sasol shall undertake regular (yearly) table-top exercises of the Emergency Plan involving key parties and regular (2 - 3 yearly) full scale exercises involving key parties.	C	<p>All Sasol staff, visitors and contractors entering the Sasol Secunda Complex, which includes the natural gas pipeline interface area, are required to undergo the SHE induction process. All training is done through the SHE Regional Learning and Development Department. Records of training are maintained by Sasol.</p> <p>Sasol conducts emergency drills at least once every three months to ensure that the staff are aware of the actions required from them during emergencies.</p> <p><u>Evidence:</u></p> <ul style="list-style-type: none"> <li>Emergency plan training registers available on Sasol's online information management system</li> <li>SHE Training, Area Specific SHE Training, and Technical Training Registers, 2024.</li> </ul>	None.

## 5 SUMMARY OF THE AUDIT FINDINGS

### 5.1 ENVIRONMENTAL AUTHORISATION

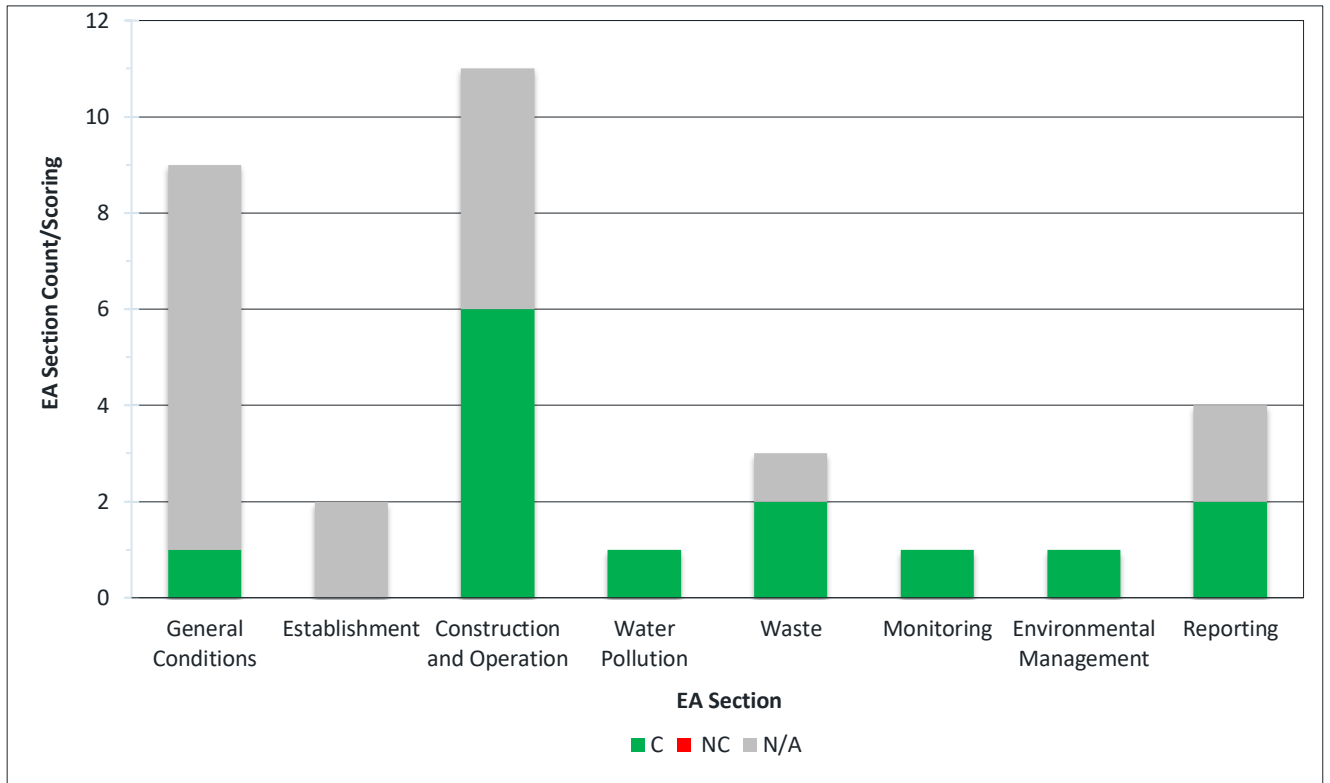
The audit findings have been summarised into the following categories: compliance, non-compliance and not applicable. The overall audit findings concerning compliance to the EA conditions are as listed in Error! Reference source not found. below.

**Table 5-1 - Summary of EA Compliance Audit Findings**

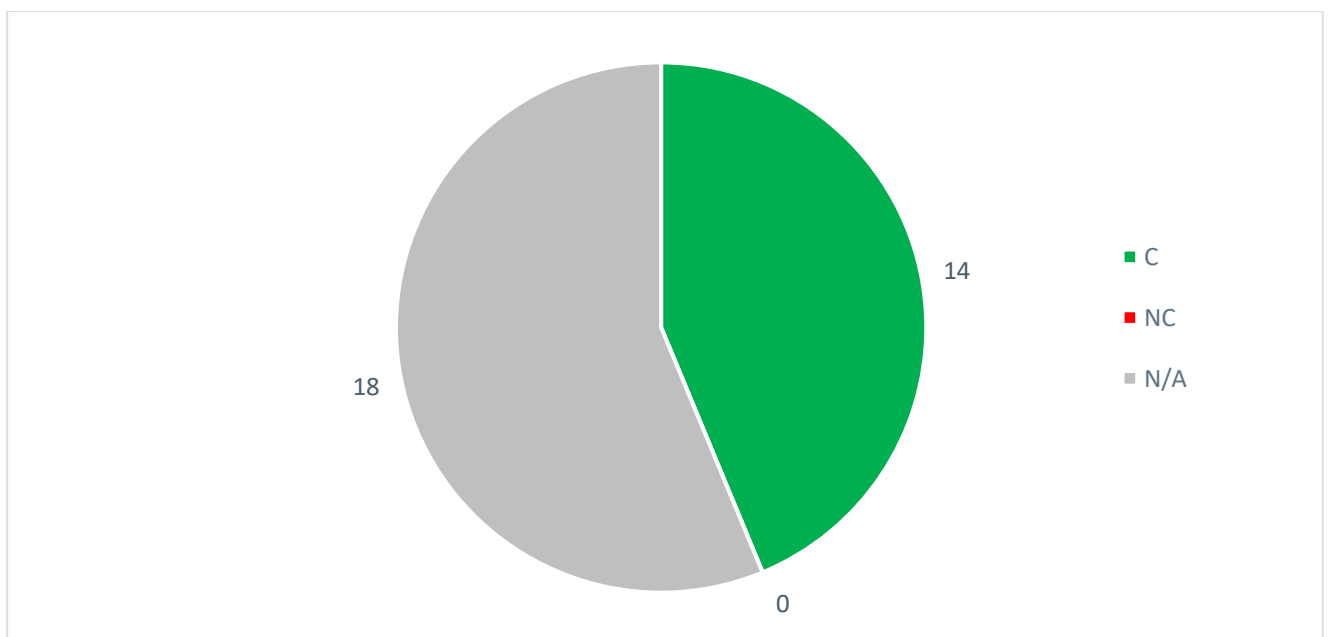
Section of the EA	No. Commitments	C	NC	N/A
General Conditions	9	1	0	8
Establishment	2	0	0	2
Construction and Operation	11	6	0	5
Water Pollution	1	1	0	0
Waste	3	2	0	1
Monitoring	1	1	0	0
Environmental Management	1	1	0	0
Reporting	4	2	0	2
<b>Total Count</b>	<b>32</b>	<b>14</b>	<b>0</b>	<b>18</b>
<b>Total Percentage</b>		<b>44%</b>	<b>0%</b>	<b>56%</b>
<b>Percentage Compliance with Applicable Conditions</b>	<b>100%</b>			

**Figure 5-1** illustrates the number/count contribution of the findings of the EA per section while **Figure 5-2** presents the total proportion of compliance for the facility.



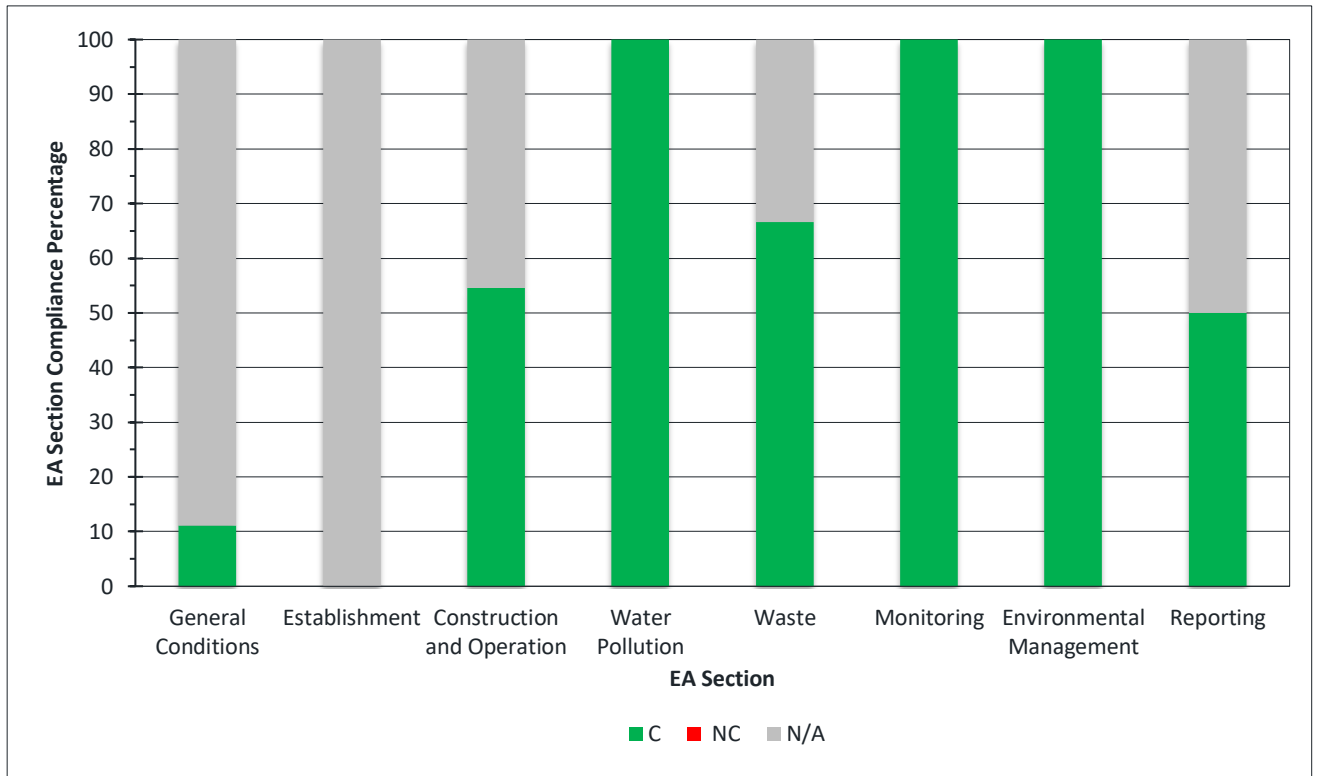


**Figure 5-1: Number/Count contribution of findings made to the EA conditions per Section**

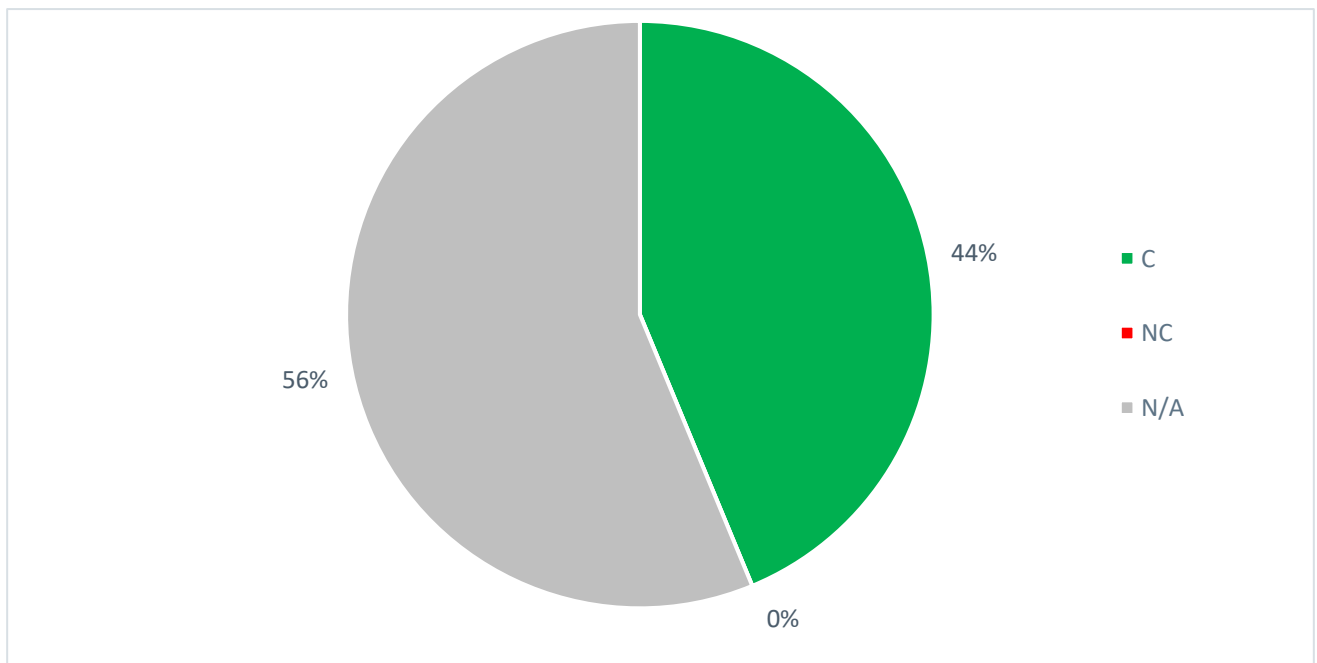


**Figure 5-2: Overall count findings on compliance to the EA conditions**

**Figure 5-3** illustrates the percentage contribution of the findings of the EA conditions. **Figure 5-4** presents the total percentage compliance for the facility.



**Figure 5-3: Percentage contribution of findings made to the EA conditions per Section**



**Figure 5-4: Overall percentage findings on compliance to the EA conditions**

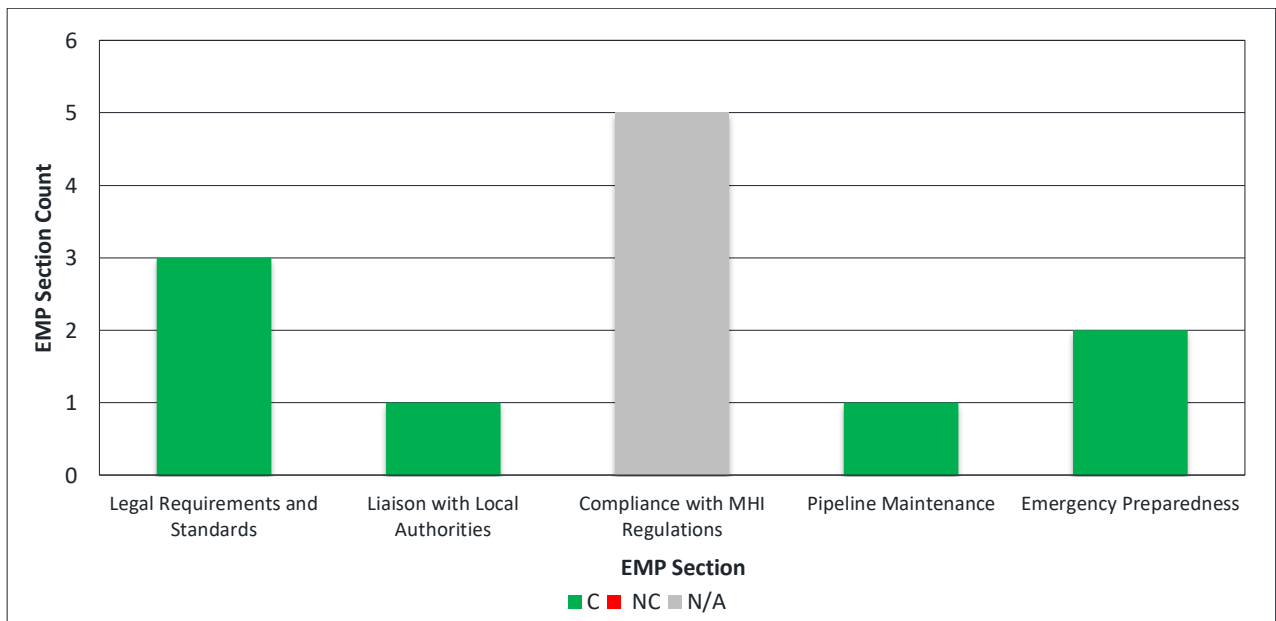
## 5.2 ENVIRONMENTAL MANAGEMENT PLAN

The audit findings have been summarised into the following categories: compliance, non-compliance and not applicable. The overall audit findings concerning compliance to the EMPr conditions are as listed in **Table 5-2** below.

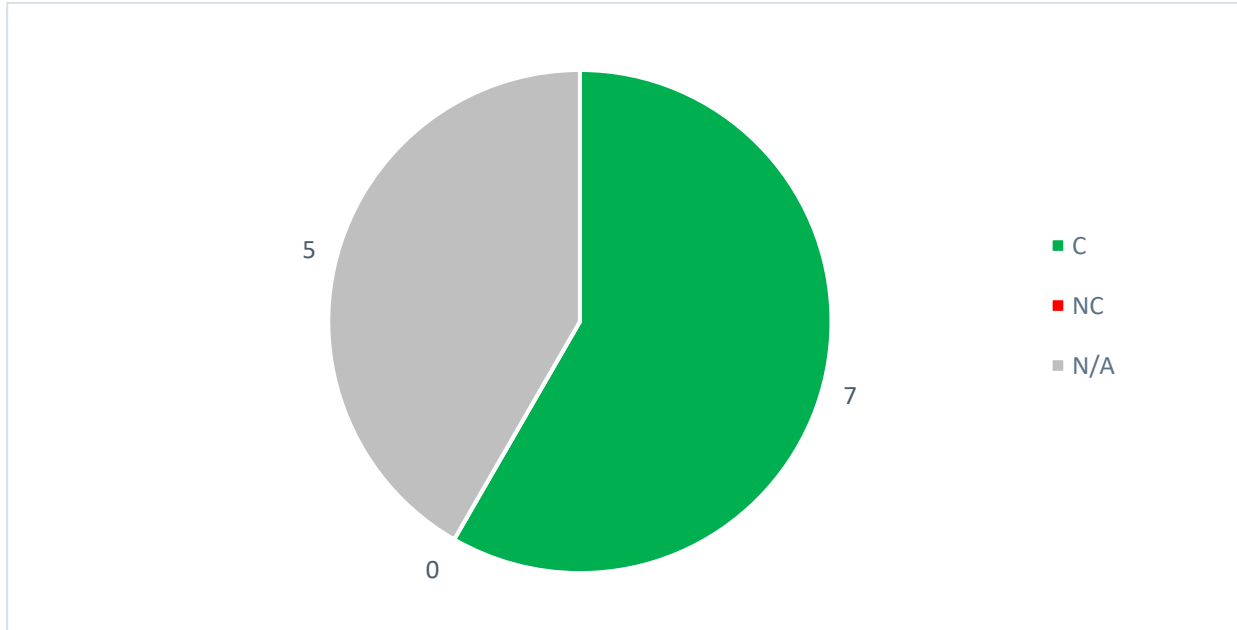
**Table 5-2 - Summary of EMPr Compliance Audit Findings**

Section of the EMPr	No. Commitments	C	NC	N/A
Legal Requirements and Standards	3	3	0	0
Liaison with Local Authorities	1	1	0	0
Compliance with MHI Regulations	5	0	0	5
Pipeline Maintenance	1	1	0	0
Emergency Preparedness	2	2	0	0
<b>Total Count</b>	<b>12</b>	<b>7</b>	<b>0</b>	<b>5</b>
<b>Total Percentage</b>	<b>-</b>	<b>58%</b>	<b>0%</b>	<b>42%</b>
<b>Percentage Compliance with Applicable Conditions</b>	<b>100%</b>			

**Figure 5-5** illustrates the number/count contribution of the findings of the EMPr per section while **Figure 5-6** presents the total proportion of compliance for the facility.

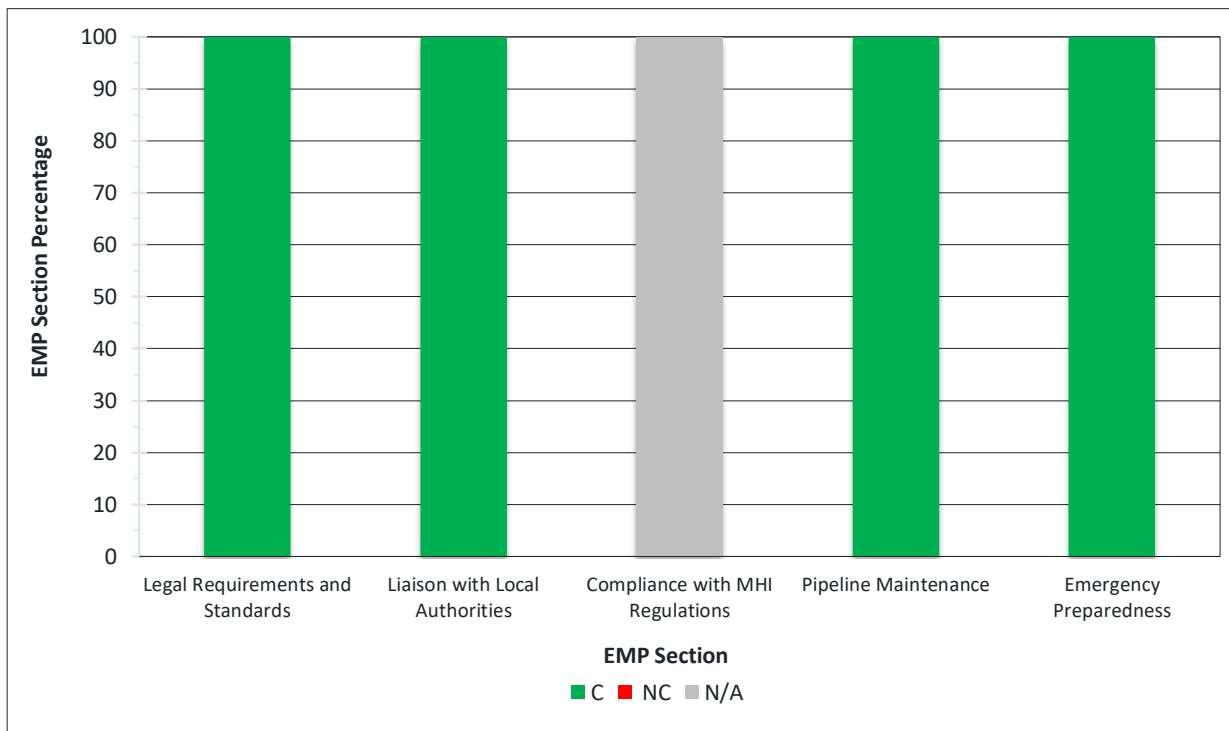


**Figure 5-5: Number/Count contribution of findings made to the EMPr conditions per Section**

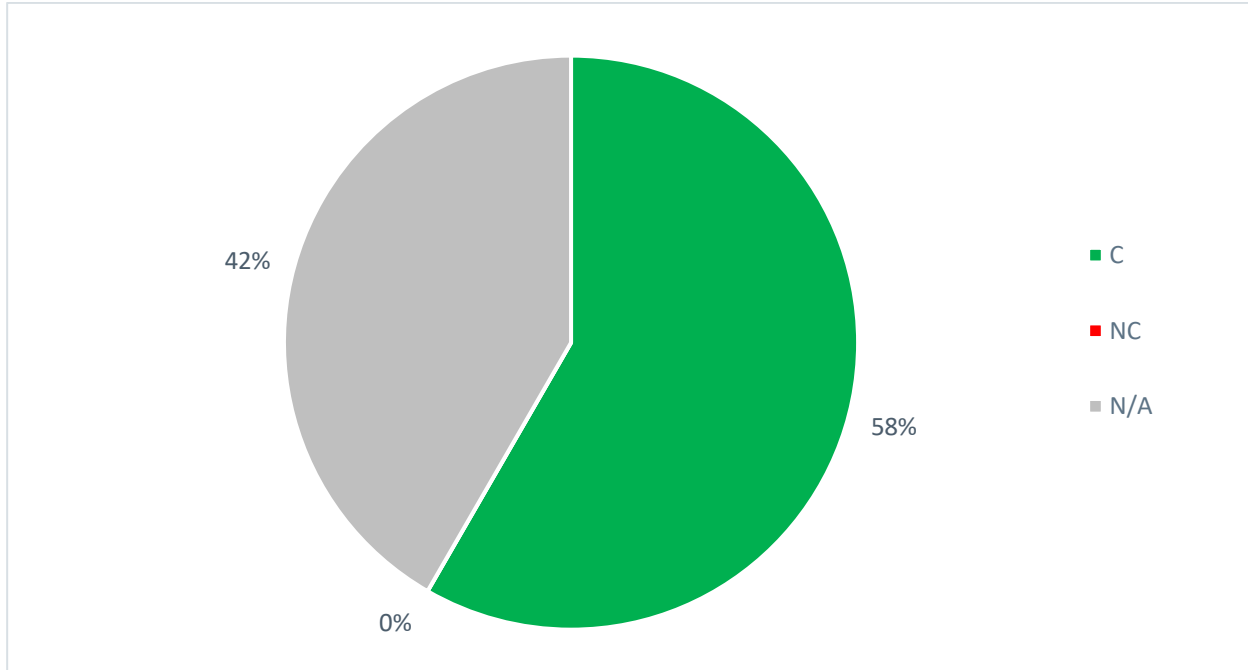


**Figure 5-6: Overall count findings on compliance to the EMP conditions**

**Figure 5-7** illustrates the percentage contribution of the findings of the EMP conditions. **Figure 5-8** presents the total percentage compliance for the facility.



**Figure 5-7: Percentage contribution of findings made to the EMP conditions per Section**



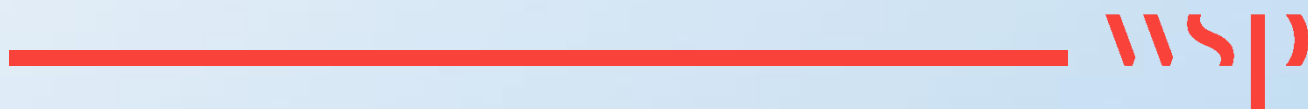
**Figure 5-8: Overall percentage findings on compliance to the EMP conditions**

### 5.3 CLOSE OUT OF PREVIOUS AUDIT FINDINGS

This audit report represents the first external compliance audit of the EA and EMP, therefore there is no close out or comparison with previous audit findings.

# Appendix A

**ENVIRONMENTAL AUTHORISATION  
SASOL SECUNDA PIPELINE  
INTERFACE (REFERENCE NO.  
16/4/4L/2001/14)**



Drum Rock Complex  
On R40 between Nelspruit &  
White River  
Nelspruit 1200  
Republic of South Africa



Private Bag x 11233  
Nelspruit. 1200  
South Africa  
Tel: (013) 759 4112  
Fax: (013) 759 4015

## DEPARTMENT OF AGRICULTURE, CONSERVATION AND ENVIRONMENT

### LOWVELD REGIONAL OFFICE Environmental management

Litho Letehli ma,  
Kcnigrwa Kwernveto,

CepjincmiTil wn L;idl: .: <i,  
Sewering en Qmgewing

Umnijngs? 'l.'dokiJiniM,  
Ukullhagonyet a hveTivelo.  
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Enquiries: Rinus Stroebe  
Tel: (013) 768-1201  
E-mail: mstroebe@nel.mpu.gov.za

Ref No: 16/4/4/L/2001/14

Sasol Technology  
Privatebag X1034  
Secunda  
2302  
Tel: (017)619-2978  
Fax: (017)619-2860

To Whom It May Concern,

#### **AUTHORISATION TO UNDERTAKE A LISTED ACTIVITY IN TERMS OF SECTION 22 OF THE ENVIRONMENT CONSERVATION ACT, 1989 (ACT 73 OF 1989)**

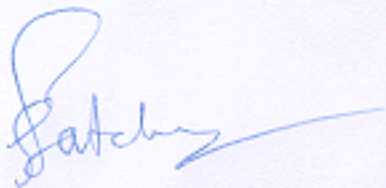
After due consideration of the facts presented to the administrators of the Department of Agriculture, Conservation & Environment in Mpumalanga, I the undersigned, through the powers vested to me in terms of Section 33(1) of the Environment Conservation Act, 1939 (Act 73 of 1989) (hereafter referred to as the Act), hereby grant exemption in terms of Section 28A of the Act and Government Notice R29 of 7 April 1995, from Section 22(2) of the Act and Government Notice R1183 of 5 September 1997.

In terms of Section 22(1) of the Act I authorise **the construction of the Sasol Gas Pipeline Interface Project at the Sasol Complex in Secunda (Activity 2(c) in terms of Government Notice R1182 of 5 September 1997)**, as described in, and with conditions as set out in the Record of Decision.



The MEC for Agriculture, Conservation and Environment may however, in terms of Section 22(4) of the Act, withdraw this authorisation at any time if any of the conditions specified in this authorisation is not or has not been met., after 30 days written notice and after furnishing good reasons for the decision.

The Record of Decision and Conditions to be complied with are attached.



**Dr G.R, BATCH KIOR**

**For: MEC: AGRICULTURE, CONSERVATION AND ENVIRONMENT**

2001.12.24

**Date**



# Mpumalanga Provincial Government

Drum Rock Complex  
On R40 between Nelspruit &  
White River  
Nelspruit 1200  
Republic of South Africa



Private Bag x 11233  
Nelspruit. 1200  
South Africa  
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## DEPARTMENT OF AGRICULTURE, CONSERVATION AND ENVIRONMENT

### LOWVELD REGIONAL OFFICE Environmental management

Liliko Letekulima,  
Konigrwa Kwawalo.

Departemant! van Lanotjou.  
Rimviiling nn Qnigi ing

Urnyjirgn Wnz< kulima,  
Ukullhogcnye wa kwemvelo,  
NebhoduVlwg

**ENQUIRIES:** Rinus Stroebe  
**TEL:** (013) 763-1201  
**E-mail:** mstroebel@nel.mpu.gov.za

Ref No: 16/4/4/L/2001/14

#### RECORD OF DECISION

##### Brief Description of Activity

Natural gas will be transported to Secunda via an underground pipeline with a diameter of 660mm from the Pande and Temane gas fields in Mozambique over an estimated distance of 860km. The natural gas pipeline interface covers the integration of the natural gas pipeline with the Sasol Synthetic Fuels (SSF) complex within the boundaries of the Sasol complex in Secunda.

The pressure of the gas will be reduced prior to entering the SSF complex. During this phase it will furthermore be filtered and heated at the Pressure Protection Station (PPS). The pipeline will, down stream of the PPS, be reduced to 600mm, prior to entering the SSF complex on its eastern side from where it will follow existing pipeline racks to unit 42. At unit 42 the gas will be odourised and thereafter reticulated to Sasol's clients.

The PPS will contain the following<sup>1</sup>:

- It will make allowance for a future pig receiver;
- A shut down valve;
- Two (2) filters to remove dust particles;
- Two (2) flow meters;

<sup>1</sup> as described in the application for exemption.



- A gas heating system that will counteract the Joule-Thompson effect that occurs when pressure in the pipeline is reduced.
- As well as pressure control valves with an independent shut valve.

### **Location**

The Sasol gas supply interface project will be located on portions of the farm Goedehoop 290IS, Twistdraai 285IS and Middelbult 284IS in the Highveld Ridge district as described in the application for exemption documentation relating to the interface project.

### **Applicant**

Sasol Technology  
Private bag X1034  
Secunda  
2302  
Tel: (017)619-2978  
Fax: (017)619-2860

Contact Person; Mr. W. Petrick

### **Site Visit**

A site visit was conducted by Mr. R. Stroebel (DACE) and Messrs. W. Petrick and S. Manana of Sasol Technology on the 11<sup>th</sup> of October 2001.

### **DECISION**

After an application has been received from the applicant for the said development, and after due consideration of the facts presented to the Department of Agriculture, Conservation and Environment (hereafter referred to as the or this Department), authorisation is granted in terms of Section 22 (3) of the Environment Conservation Act 1989 (Act 73 of 1989) (hereafter referred to as the Act) for the construction and operation of the Sasol gas interface project in Secunda.

### **Conditions**

Refer to Annexure A to this Record of Decision.

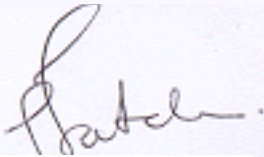
### **Key factors for the Decision**

1. The overall impact of the Sasol gas supply project has been addressed in a separate application for authorisation that has been lodged at the National Department of Environmental Affairs and **Tourism**(NDEA&T).
2. Public participation in the decision making process associated with the overall **gas** pipeline project was enabled during the application mentioned above.
3. The pipeline route within the boundaries of the Sasol complex, mainly follow existing pipe racks as described in the layout of the pipeline routing as stipulated in the motivation for exemption documentation.
4. The FPS will be monitored and controlled from the Sasol Gas Control Room without the presence of on-site operators, **giving** an indication of the low maintenance as well as low impact of the interface section of the pipeline seen in its entirety.



5. The process of cleaning the pipeline and venting off-gasses containing dust particles are not considered as a scheduled process by the NDEA&T.
6. The internal risk assessment that Sasol conducted gave an indication of the acceptability of the routing of the pipeline on some of the existing pipe racks as indicated in the interface pipeline route description.

Any appeal regarding the Department's decision can be directed to the MEC, Department Agriculture, Conservation & Environment, Private Bag X 11233, Nelspruit, 1200, within 30 days of the date of this authorisation, An appeal to the Minister or provincial authority under section 35 (3i) of the Act. must be done in writing within 30 days from the date on which this record of decision was issued to the applicant.



**Dr, G.RBATCHELOR**

**For: MEC: AGRICULTURE, CONSERVATION AND ENVIRONMENT**

24 / 12 / 2001.

**Date**





**ANNEXURE A; TO THE RECORD OF DECISION FOR THE CONSTRUCTION OF  
THE SASOL GAS PIPELINE INTERFACE PROJECT AT  
SECUNDA**

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**CONDITIONS**

**1. General Conditions**

- 1.1. This authorisation refers only to the project specified above and described in the Record of Decision, hereafter referred to as "the interface project" or "development". Separate applications for authorisation or exemption must be lodged for any other development and/or activity at or near the proposed development, which is covered by Section 21 and 22 of the Act and Government Notice R1182 and R1183 of 5 September 1997.
- 1.2. Authorisation is only granted in terms of Section 22 of the Environment Conservation Act 1969 (Act 73 of 1989) and does not exempt the holder from compliance with any other relevant legislation.
- 1.3. No development may take place on the area of concern without the necessary permits/approvals and/or service agreements, where it is relevant, from or between all other relevant authorities- These authorities include, but may not be limited to the following:
  - 1.3.1. The relevant Local Council.
  - 1.3.2. Department of Water Affairs & Forestry.
  - 1.3.3. Chief Air Pollution Control Officer
- 1.4. Copies of the relevant permits/approvals and/or service agreements must be forwarded to this Department for record keeping purposes.
- 1.5. This Department may add to, change and/or amend any of the conditions in this authorisation in terms of Section 31A(b) of the Environment Conservation Act (Act 73 of 1989) and/or Section 28(4) of the National Environmental Management Act (Act 107 of 1998) if, in the opinion of the Department, it is environmentally justified and after consulting with the relevant parties involved.
- 1.6. Control and mitigation measures specified in all the relevant documentation submitted to the Department as part of the application for authorisation, must be strictly adhered to.

**2. Establishment**

- 2.1. This authorisation is repealed if the project has not commenced within two (2) years from the date of this authorisation.
- 2.2. If any changes need to be made to the design of the interface project, this Department must **be** informed thirty (30) days **in** advance, to be able to **decide** whether the changes need authorisation.

**3. Construction and operation**

- 3.1. No construction or raw materials should be stored within any area where runoff water might reasonably be expected to pass through.
- 3.2. The pollution of adjacent areas due to improper storage of construction and/or raw materials as well as other hazardous substances should be prevented.
- 3.3. Sufficient steps must be taken to prevent soil pollution through oil spillage.



- 3.4. Sufficient provision must be made **in** the contractor's budget for the mitigation of environmental impacts during the construction period.
- 3.5. Fill material should only be obtained from a registered borrow pit if and when such fill material is required.
- 3.6. The following conditions relate to the sections of the interface pipeline that will be routed underground:
  - 3.6.1. Appropriate soil erosion prevention measures must be taken along the pipeline corridor.
  - 3.6.2. Topsoil must be removed and stored separately from subsoil in specifically designated areas.
  - 3.6.3. After compaction the disturbed surface should be at the same level as the adjacent area, to avoid accumulation of water run-off and erosion resulting from it.
  - 3.6.4. Weed control measures must be implemented.
- 3.7. Adequate ablution facilities must be provided for construction workers through the use of chemical toilets.

#### **4. Water Pollution**

Water pollution must be prevented as far as possible and no chemicals or waste associated with the interface project may be allowed to pollute the soil, the surrounding **area** or **any** open or underground water.

#### **5. Waste**

- 5.1. All waste generated during construction and operation of the interface project shall be stored and handled **in** an environmentally acceptable way **and** as directed by this Department or any other relevant authority.
- 5.2. **All** waste generated during construction and operation of the interface project shall be disposed of at an approved waste site that is permitted to handle the relevant types of waste.
- 5.3. Stripped topsoil must be used at the borrow pits for rehabilitation purposes as stipulated in the identification of potential environmental impacts.

#### **6. Monitoring**

- 6.1. All the relevant conditions for the monitoring of the pipeline and the transportation of natural gas from Malelane to Secunda in its entirety, as specified in the pipeline Environmental Management Plan (EMP) and conditions of approval stipulated in the authorisation that is to be issued by the National Department of Environmental Affairs and Tourism (NDEA&T) must be adhered to.

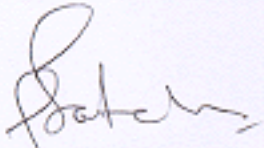
#### **7. Environmental Management**

- 7.1. All the relevant conditional requirements relating to the implementation of EMP procedures in the management of environmental impacts associated with the interface project as stipulated in the authorisation referred to above, must be implemented and adhered to.



## **S. Reporting**

- 8.1. Records relating to the compliance/non-compliance with the conditions of the Exemption must be kept in good order. Such records must be made available to this Department within seven (7) workdays of the date on a written request by this Department for such records.
- 8.2. Non-compliance with, or any deviation from the conditions as set out in this authorisation, is regarded as an offence and after reasonable provision has been made for remedial action, will be dealt with in terms of Section 29, 30 and 31A of the Act.
- 8.3. Any concerns raised by interested and affected parties should be investigated and addressed to the satisfaction of this Department.
- 8.4. Any complaints regarding the said development must be brought to the attention of this office within 24 hours after receiving the complaint. A complaints register must be kept up to date for inspection by members of the Department.



**Dr. G.R. BATCHELOR**

**For: MEC: AGRICULTURE, CONSERVATION AND ENVIRONMENT**

2001. (Z. 24

Date





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