

#### SASOL SOUTH AFRICA LIMITED

## SASOL GNP GAS PIPELINE ENVIRONMENTAL AUTHORISATION AND ENVIRONMENTAL MANAGEMENT PLAN - EA REFERENCE 12/12/20/1067

**COMPLIANCE AUDIT REPORT** 



REF NO: 12/12/20/1067 AUGUST 2024



## SASOL SOUTH AFRICA LIMITED

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COMPLIANCE AUDIT REPORT

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APPENDIX A

ENVIRONMENTAL AUTHORISATION (REF NO: 12/12/20/1067)



#### 1 INTRODUCTION

#### 1.1 TERMS OF REFERENCE

Sasol South Africa Limited (Sasol) appointed WSP Group Africa (Pty) Ltd (WSP) to conduct a compliance audit of its Environmental Authorisation (EA), reference number 12/12/20/1067 and corresponding Environmental Management Programme (EMPr) for a gas pipeline that runs from Secunda to Sasolburg dated 12 October 2009. The pipeline is an underground pipeline that carries natural gas (methane) from the tank farms in Secunda and supplies Natref in Sasolburg.

The external compliance audit assessed compliance to conditions which is applicable during the operational phase only. All conditions applicable to the pre-construction, construction and closure phases were considered not applicable during this audit. This report focuses on the audit period from July 2020 to May 2024.

# 1.2 SASOL GAS PRODUCT PIPELINE (EA REFERENCE NUMBER: 12/12/20/1067)

The pipeline's starting point is at Sasol Synfuels site in Secunda where it is loaded with gas before it goes underground until it reaches Natref in Sasolburg to feed the relevant plant. The pipeline traverses 15 river crossings and 40 wetland crossings that are authorised by the EA from the Department of Environmental Affairs (DEA), now the Department of Environment, Forestry and Fisheries (DEFF). The EA was issued by the DEA on 12 October 2009 and authorised the following listed activities as per the National Environmental Management Act (NEMA):

- GNR 387 Activity 1; and
- GNR 386 Activities 1, 4, 7 12 and 15.

The pipeline is now in the operational phase, however, conditions that have tasks that should have been done prior, during or immediately after construction (except those that are strictly construction related) were evaluated to ensure that they were closed out prior to this audit. Maintenance operations have been assessed using construction conditions for the EA, however, assessment as per the EMPr was within the operational conditions. The locality of the map is indicated in **Figure 1-1** below.

#### 1.2.1 SITE OBSERVATIONS

The GNP gas pipeline runs in parallel to the SNI liquid pipeline and share the same servitude. Due to the nature of the gas product in the GNP pipeline, there is lesser risk of potential theft incidents as compared to the SNI pipeline.



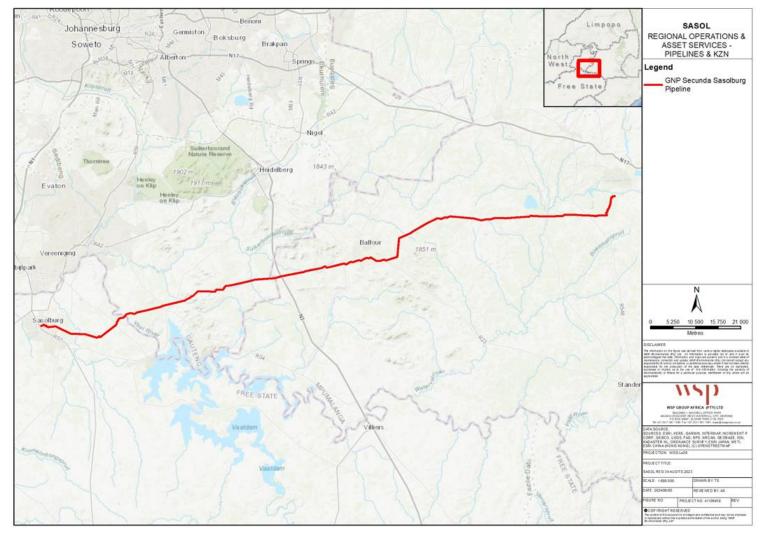


Figure 1-1: Pipeline Stream, River and Wetland Crossings from Sasol Synfuels (Secunda) to Sasolburg Industrial Are



#### 2 AUDIT SCOPE

The 7 April 2017 amendment to the Environmental Impact Assessment (EIA) regulations introduced the requirement for the auditing of all EAs and EMPrs in effect on 8 December 2014 and submission of the 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 July 2020 to May 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 against the conditions outlined in the EA and EMPr;
- Make recommendations in order to achieve compliance in terms of the EA and EMPr;
- Ensure the commitment contained in condition 1.2 of the EA is completed which states:
  - "The holder of this authorisation shall be responsible for ensuring compliance with the
    conditions of this authorisation by any person acting on his or her behalf, including but not
    limited to, an agent, sub-contractor, employee or person rendering a service to the holder of
    the authorisation."

#### 3 AUDIT METHODOLOGY

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 and commitments.

The audit process comprised the following:

- Compilation of the audit checklist;
- Site inspection (23 and 24 April 2024);
- Reguest and collection of information;
- Review of documentation relevant to the conditions of the license; and
- Compilation of an audit report.

#### 3.1 AUDIT CHECKLIST

WSP compiled an audit checklist to assist with the EA and EMPr compliance audit (Section 4). The checklist includes all conditions and commitments contained in the EA and EMPr.

#### 3.2 SITE INSPECTION

WSP Auditor, Jashmika Maharaj conducted the site inspection on 23 and 24 April 2024. The findings and observations of the site visit are recorded and summarised in Section 4 with photographic evidence included in **Table 4-1** for the EA and **Table 4-2** for the EMPr.

Key personnel interviewed included:

- Willem Burger (SHE: Environmental Risk & Compliance Senior Specialist); and
- Aaron Langa (Inland Operations Foreman).



#### 3.3 DOCUMENTATION CONSIDERED

The following documentation were provided or considered:

- SNI\_GNP Water Intersections;
- SNI & GNP Report
- (13) 1.11.1.6-ECO monitoring
- ROAS\_ISO14001\_BSI Ecertificate\_Exp20241227
- Ext WUL audit FAD6 2022-06-20
- Sasol South Africa Ltd Secunda Commencement notification
- 41102457 20200813 Sasol Gas GNP Pipeline EA & EMP Audit Report Final Signed
- 41102457 20200813 Sasol Gas GNP Pipeline WUL Audit Report Final Signed
- Incident register\_FY24
- (18)1.16-ROD\_2009 secunda-sasolburg\_GNP
- 1b-Leak detection (SCADA): GNP Control Philosophy Report Rev 1
- Pipeline Safety Awareness Presentation eMalahleni 19.10.2023
- ATTENDANCE REGISTERS FOR PIPELINE SAFETY AWARENESS SESSION 19.10.2023
- Pipeline Safety Awareness Presentation eMalahleni 15.11.2023
- ATTENDANCE REGISTERS FOR PIPELINE SAFETY AWARENESS SESSION 15.11.2023
- Sasol SharePoint Folders:
  - (10) 1.9.41- Rehab reports
  - (10) 1.9.42- Reinstatement report
  - (10) 1.9.43- ECO signed reports
  - (11) 1.9.44- Service crossings approval
  - (11) 1.9.45- Accidental services damaged
  - (11) 1.9.46- Damages claims
  - (11) 1.9.47- Service crossings methods
  - (11) 1.9.48- Private road use agreements
  - (11) 1.9.49- Construction speed limit
  - (11) 1.9.50- Private road rehab
  - (11) 1.9.51- Government approvals
  - (11) 1.9.52- No fence damages
  - (11) 1.9.53- Written consent for private fence
  - (11) 1.9.54- Reinstatement of fencing
  - (12) 1.10.1.1- MHI risk
  - (12) 1.10.1.2- Emergency plan
  - (12) 1.10.2-EMS management servitude
  - (13) 1.11.1.6-ECO monitoring
  - (13) 1.11.1.7-ECO quarterly report
  - (13)1.11.1.1- Apoint ECO
  - (13)1.11.1.10-Rehab report
  - (13)1.11.1.11-Sign reinstatements
  - (13)1.11.1.2- ECO date
  - (13)1.11.1.3-ECO induction
  - (13)1.11.1.4-Construction notice



- (13)1.11.1.5-ECO landovers details
- (13)1.11.1.8-ECO incident report
- (13)1.11.1.9.1- ECO site dairies
- (14)1.11.2.1-Operations audit reports
- (15)1.11.2.1- Audit reports for Department
- (15)1.12.1-Audit report letter
- (15)1.12.2-External audit reports
- (16)1.13.1-Construction notice letter
- (17)1.14.1-Notice to department Construction
- (17)1.14.2-Department notice
- (18)1.16-ROD
- (2) 1.2 Works information contract
- (2) 1.3-EIAR
- (2) 1.4- ROD amendments
- (2) 1.5- Construction- Commissioning dates
- (2) 1.6- Operating manual
- (2)1.1-Environmental Authorisation
- (2)1.6.1- Specialist study
- (2)1.6.2-EA amendments
- (3) 1.7- Interested and affected party notice
- (4) 1.9.1- EMP and EIA
- (4) 1.9.2-1.9.2.17- ECO weekly reports
- (4) 1.9.3- EMP amendments
- (4) 1.9.4- Apporved EA EMP amendments
- (5) 1.9.10- Waste bins part of works information
- (5) 1.9.11- No open fires Contract
- (5) 1.9.12-Pipe laydown servitudes
- (5) 1.9.13- Servitude rehab
- (5) 1.9.14- Rehab Method statement
- (5) 1.9.15- Protected species procedure
- (5) 1.9.16- Avoid large specimens
- (5) 1.9.5- Servitude agreements
- (5) 1.9.6- Route adjustments approved
- (5) 1.9.7- Construction work in servitude
- (5) 1.9.8- Construction workers reside
- (5) 1.9.9- Toilets provision works information contract
- (6) 1.9.17- Construction camp security
- (6) 1.9.18-Site Camp approval
- (6) 1.9.19- Recruitment
- (6) 1.9.20- Camp management
- (6) 1.9.21-Camp inspection
- (6) 1.9.22- Camp housekeeping
- (6) 1.9.23- No camp waste water releases



- (7) 1.9.24- Vehicle servicing
- (7) 1.9.25- Hydrocarbon storage
- (7) 1.9.26- Spills and rehab
- (7) 1.9.27- Breakdown of equipment
- (7) 1.9.28- Waste management
- (8) 1.9.29- Noise abatement
- (8) 1.9.30- Security lights at station
- (8) 1.9.31- Design of stations
- (8) 1.9.32- station ablutions
- (9) 1.9.33- Wetland and river crossings
- (9) 1.9.34- Approvals
- (9) 1.9.35- Method statements
- (9) 1.9.36- Wetland rehab
- (9) 1.9.37- Rehad method statements
- (9) 1.9.38- Vegetation methods
- (9) 1.9.39 Erosion protection
- (9) 1.9.40- Pollution prevention
- 1a- Trench drawing design
- 1b-Leak detection (SCADA)
- 1c- Water use license (River crossings)
- 1d- ECO report
- 1e-Heritage report
- 1f-MHI Report
- 1g- Construction servitude
- 2- Site laydown
- 3- Servitude road
- 4- Pipeline markers
- 6- ECO Weekly report
- Secunda-Sasolburg
- Site photos

#### 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 EMPr. Each condition was verified, either by reviewing documentation, interviewing employees and/or visually inspecting the pipeline servitude. 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 rating	Explanation
Compliant (C)	Condition/mitigation measure/commitment has been achieved, with evidence provided in the form of a document or site verification.  Opportunities for improvement (OFI) may be listed against compliant conditions
Non-compliant (NC)	Specified commitments, conditions and documents were not in place or implemented according to the requirements of the EA and associated EMPr. Noncomplaint conditions are given target completion dates, as follows:  Short term: 0 – 6 months.  Medium term: 6 – 12 months.  Long term: 12 - 18 months
Not applicable (N/A)	These are commitments that 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

Aaron Langa (Pipeline Controller) and Willem Burger (SHE: Environmental Risk & Compliance – Senior Specialist) hosted Consultant, Jashmika Maharaj for the duration of the Audit. WSP would like to express our gratitude for their time and attention during our visit. A brief summary of the external auditors' experience is provided below.

#### Auditor: Jashmika Maharaj

Jashmika holds Bachelor of Science Honours in Environmental Management Science: Jashmika has 9 years of professional work experience as an environmental consultant. Her qualifications include a BSc Environmental Science degree (2014) — University of KwaZulu-Natal and a BSc Honours in Environmental Management — University of South Africa (2019). Her role as an environmental consultant includes but is not limited to project management (project budgeting and costing, invoicing), compilation of Environmental Impact Assessments(EIAs), Basic Assessment Reports (BARs), Water Use Licence (WULAs), Environmental Audit reports, Environmental Management Programmes (EMPrs), Waste Management Licence Applications (WMLA), analysis of engineering reports and drawings, and environmental legislation, peer reviewing, stakeholder engagement, preparation of proposals and tenders, liaison with relevant competent authorities and clients.

#### Lead Auditor 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

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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 ongoing research or further work in this field, or pertaining to this investigation.

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#### **AUDIT FINDINGS** 4

#### 4.1 **ENVIRONMENTAL AUTHORISATION**

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

No.	Condition	Compliance Status	Finding	Recommendation
Scope o	of Authorisation			
1.1	Authorisation of the development is subject to the conditions contained in this authorisation, which conditions form part of the environmental authorisation and are binding on the holder of the authorisation.	N/A	Noted.	None
1.2	The holder of this authorisation shall be responsible for ensuring compliance with the conditions of this authorisation by any person acting on his or her behalf, including but not limited to, an agent, sub-contractor, employee or person rendering a service to the holder of the authorisation.	С	The EA holder (Sasol) keeps track record of any monitoring against the EA conditions to ensure compliance, including inspection schedules, external audit reports which are submitted to the Department.  Evidence:  SNI & GNP Report  (13) 1.11.1.6-ECO monitoring	None.
1.3	The authorised development may only be carried out at the property indicated above and as described in the EIAR dated 22 May 2009, and as	С	The development was carried out only at the authorised property and is now in the operational phase. The kmz file showing the pipeline pathway and relevant crossings was available for review.  Evidence:	None.

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No.	Condition	Compliance Status	Finding	Recommendation
	shown on the map set included in the EIAR.		■ Figure 1-1	
1.4	Any substantial changes to the project description set out in the EIAR, and authorised under this authorization must be approved, in writing, by the Department before such changes may be effected. in assessing whether to grant such approval or not, the Department may request such information as it deems necessary to evaluate the significance and impacts of such changes and it may be necessary for the holder of the authorisation to apply for further authorisation in terms of the regulations.	N/A	Outside of audit period. The only deviations undertaken with regards to the project were sought in May 2010 and approved in August 2010. The amended EA to authorise the deviations was available for review. No new deviations were conducted over the audit period.	None.
1.5	This development must commence within a period of five (5) years from the date of issue of this authorisation. If commencement of the development does not occur within that period, the authorisation lapses and a new application for environmental authorisation must be made in order for the development to be undertaken.	N/A	Outside of audit period. Pipeline is now operational. Therefore, this condition is not applicable.	None.
1.6	This authorisation does not negate the holder of the authorisation's responsibility to comply with any other	N/A	Noted. This audit does not form part of a legal audit, however, Sasol has a legal register to monitor compliance with its other legal responsibilities.	None.

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No.	Condition	Compliance Status	Finding	Recommendation
	statutory requirements that may be applicable to the development and associated infrastructure.			
1.6.1	Relevant legislation that must be complied with by the holder of this authorisation include but is not limited to:  Compliance with the requirements of Section 38 of the National Heritage Resources Act, Act 25 of tees, including any comments and recommendations of the relevant heritage resources authority responsible for the area in which the development is proposed.  Provisions of the Occupational Health and Safety Act, Act 85 of 1993.  Provisions of the Environment Conservation Act, Act 73 of 1989.  Provisions of the NEM: Air Quality Management Act, Act 39 of 2004.  Provisions of the NEM: Waste Management Act, Act 59 of 2008.  Provisions of the Conservation of Agricultural Resources Act, Act 43 of 11962.  Provisions of the National Forests Act, Act 84 of 1998.	N/A	Outside of audit period. The pipeline is now operational with excavations only done during maintenance. Therefore, this condition is not applicable.	None.

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No.	Condition	Compliance Status	Finding	Recommendation		
	Provisions of the National Water Act, Act 36 of 1998.					
	Provisions of the Hazardous Substances Act, Act 15 of 1973.					
	Provisions of the National Key Points Act, Act 102 of 1960.					
	Provisions of the Petroleum Pipelines Act, Act so of 2003.					
	Provisions of the Explosives Act, Act 26 of 1956.					
	Provisions of the Fencing Act, Act 31 of 1963.					
	Relevant local authority bylaws and regulations.					
	Should any activity be planned on site that is a listed activity in terms of the NEMA Regulations, 2006, which is not covered by this authorisation, a separate application for such activity must be lodged with the relevant competent authority.					
Appeal o	Appeal of Authorisation					
1.7	The holder of the authorisation must notify every registered interested and affected party (IAP), in writing and within 10 (TEN) calendar days, of	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.		

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No.	Condition	Compliance Status	Finding	Recommendation
	receiving notice of the Departments decision to authorise the development.			
1.8	The notification referred to in 1.7 must			
1.8.1	Specify the date on which the authorization was issued,	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.8.2	Inform the interested and affected party of the appeal procedure provided for in Chapter 7 of the regulations,	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.8.3	Advise the interested and affected party that a copy of the authorisation will be furnished on request, and	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.8.4	Give the reasons for the decision.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.9 Ma	anagement during the Construction Pha	se:		
1.9.1	The environmental management plan (EMP) for the construction phase included in the EIAR dated 22 May 2009, section 13 on page 117, and submitted to the Department, is hereby approved for implementation. The mitigation measures proposed in the EIAR dated 22 May 2009, and	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.



No.	Condition	Compliance Status	Finding	Recommendation
	requirements stipulated in the EMP as included in the EIAR, for environmental management during the construction phase forms part of the conditions of this environmental authorisation and must be implemented by the holder of this authorisation.			
1.9.2	The holder of this authorisation must ensure the following measures are implemented during the construction phases of the pipelines development:			
1.9.2.1	All contractor staff must undergo environmental awareness induction training with regard to protection of the natural environment, the conditions of the environmental authorisation, the requirements of the EMP and the respect of the rights of landowners on whose properties construction takes place.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.9.2.2	All contractor staff must be easily identifiable through the use of company overalls with company logos and all contractor staff must have an identity card to ensure unwanted elements can be identified to ensure security of the surrounding communities and landowners.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.

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No.	Condition	Compliance Status	Finding	Recommendation
1.9.2.3	Measures for waste avoidance and minimisation at all works areas, laydown areas and construction camps and disposal of construction waste at an appropriately registered facility.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.9.2.4	Measures for dust control during the construction phase.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.9.2.5	Measures for noise control during the construction period where construction activities occur close to residences or built-up areas to limit the nuisance factor of noise.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.9.2.6	Measures to ensure public access to any homesteads or amenities must at all times be guaranteed and shall not be restricted due to this development. Where use is made of private access roads to gain access to the construction site, use of such roads must be negotiated with the affected landowners and speed limits on such roads must be enforced on all construction vehicles. All access roads used by the contractors must be reinstated to their original condition if any damage is caused to such roads.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.



No.	Condition	Compliance Status	Finding	Recommendation
1.9.2.7	Archaeological remains, features and structures older than 60 years are protected by the National Heritage Resources Act, 1999 (Act No. 25 of 19991. Should any archaeological or palaeontological artefacts be exposed during excavation for the purpose of laying the pipelines, construction in the vicinity of the finding must be stopped. A heritage specialist must be called to the site for inspection. Under no circumstances shall any artefacts be destroyed or removed from the site. The South African Heritage Resource Agency must be informed of any new finds.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.9.3	The approved construction EMP will be seen as a dynamic document. Should the construction activities exceed any predicted impact levels, the EMP must be amended to include any additional requirements. However, any proposed amendment of the EMP must be submitted to the Department for approval in writing.	N/A	Noted. There have been no amendments to the EMPr during the audit period.	None.
1.9.4	Amendment of the EMP must be approved in writing by the Department before such changes can be implemented.	N/A	Noted. There have been no amendments to the EMPr during the audit period.	None.



No.	Condition	Compliance Status	Finding	Recommendation	
Servitude \	Servitude Works Area and Pipe Laydown Areas				
1 .9.5	This development is authorised on condition that Sasol Gas acquires the necessary servitude rights for the pipelines route. Sasol Gas must negotiate with affected landowners within the authorised corridor alignment prior to the start of construction activities. Proof of such negotiations must be made available to the Department on request should any dispute arise.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.	
1.9.6	In addition, any route adjustment, due to the specific; local circumstances, which deviates outside the authorised corridor alignment of 200m, must be assessed and submitted to the Department for authorisation in writing before implementation. Approval of such deviations outside the authorised corridor must be authorised in writing by the Department before such deviations may be implemented.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.	
1.9.7	All construction works are limited to the servitude area negotiated with the landowners, The works areas must be properly demarcated.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.	



No.	Condition	Compliance Status	Finding	Recommendation
1.9.8	No construction workers shall be allowed to reside on any site unless a written agreement with the affected landowner is obtained.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.9.9	All work areas must be supplied with proper sanitation facilities. Portable toilets (at least one for every twenty workers) must be deployed along the works areas and workers must use these facilities at all times. No use of the veld is allowed for sanitation purposes. Workers transgressing this condition must be fined or removed from site.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.9.10	All works areas must have waste bins for general waste and such bins must be serviced regularly. All bins must be supplied with lids to ensure littering is prevented. Bins must be secured to prevent wild animals from spreading litter from such bins. Workers littering the site must be fined or removed from site.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.9.11	No open fires are allowed on site for heating or cooking purposes. The Applicant must ensure that the contractor have firefighting equipment available at all work sites in the event of accidental fires, especially during	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.



No.	Condition	Compliance Status	Finding	Recommendation
	welding of the pipeline sections. Firefighting equipment must be tested regularly for operation and workers must be trained in the use of such equipment. The Applicant will be responsible for all claims emanating from run-away fires caused by the construction work teams.			
1.9.12	All pipe laydown areas outside the negotiated servitude area must be negotiated with the affected landowner and written agreement must be obtained. Proof of such negotiations and agreements must be made available to the Department on request should any dispute arise.	N/A	Outside of audit period. The pipeline is now operational. There have been no requests by the Department over the audit period.	None.
1.9.13	Servitude vegetation clearing must be done in accordance with the recommendations of the EIAR and a search and rescue operation of protected species must be done where the plants can be transplanted safely and with a reasonable success rate.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.9.14	Topsoil and spoil must be stored separately and topsoil must be stored in such a way as to ensure maximum protection of the quality of the topsoil	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.

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No.	Condition	Compliance Status	Finding	Recommendation
	to ensure the seed bank stays viable for rehabilitation.			
1.9.15	No protected species of vegetation may be destroyed without the required permit from the relevant competent authority.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.9.16	Where possible, large specimens of indigenous species within the construction servitude must be preserved if they will not interfere with or pose a danger to the future operation of the pipelines or cause a major obstacle during construction works.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
Construction	on Camps			
1.9.17	Construction camps must be sited taking into consideration the local community security concerns.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.9.18	No construction camp site on privately owned land may be established without written approval from the affected landowner.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.9.19	No labour recruitment may be done at construction camps. Recruitment offices for labour may be set up in	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.

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No.	Condition	Compliance Status	Finding	Recommendation
	towns in proximity to the works areas to allow local labour to apply for work.			
1.9.20	The holder of this authorisation must have a specific management plan for management of the day to day operation of each construction camp site, including measures for waste management, sanitation and water management.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None
1.9.21	Construction camps must be inspected weekly by the environmental control officer (see) for compliance with the management plan for camp sites.	N/A	Outside of audit period. The pipeline is now operational. The ECO was required during the construction phase.	None.
1.9.22	Construction camp sites must be kept neat and the visual impact of camp sites must be mitigated to acceptable levels through screening.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.9.23	No water may be abstracted from or affluent or waste water released into natural sources without the required permits from the DWA and Sasol Gas must have written agreements with landowners for use of any water from private boreholes or dams.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.



No.	Condition	Compliance Status	Finding	Recommendation	
Workshop	Workshop Areas at Construction Camps				
1.9.24	Workshop areas for vehicle servicing must have a concrete floor area for servicing of vehicles.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.	
1.9.25	All hydrocarbon containing fuels and lubricants must be stored inside a bunded area which can accommodate 110 percent of the stored liquids.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.	
1.9.26	All spills of hydrocarbon materials shall be contained and cleaned up immediately and polluted soils shall be disposed of in a registered waste site. Minor spills can be treated on site.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.	
1.9.27	Should it be necessary to service any vehicles or equipment in the servitude construction area due to a breakdown, a drip tray shall be used to prevent carbon spills onto the soil.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.	
1.9.28	All hydrocarbon waste material generated at the workshop shall be contained in proper storage drums for recycling or disposal at a registered waste site.	N/A	There are no workshop areas on the site and no vehicles are serviced on the site.	None.	



No.	Condition	Compliance Status	Finding	Recommendation
Pressure I	Reducing Station and Pigging Stations			
1.9.29	Noise abatement measures must be installed at all stations to reduce the impact of noise associated with pumping during the operational phase, especially in stations in close proximity to residential areas or homesteads.	С	The auditor was informed that all stations have noise abatement measures installed. There were no noises noticed during the site visit and there have been no complaints from the surrounding residents.  Evidence:  Environmental incident register FY20 Incident register_FY21 Incident register_FY22_1 Incident register_FY23 Incident register_FY23	None.
1.9.30	Security lighting installed at stations must be designed in such a way that light spill to the surrounding areas is minimised, especially where stations are constructed in rural areas with a high visual quality and where light spill may cause a significant aesthetical impact.	С	Security lighting at stations is designed in such a way that light spill to the surrounding areas is minimised. The setting is such that there is limited light spill to cause a significant aesthetical impact.  Although the site visit was done during the day, the light fixtures are oriented in a manner to limit any light spill as they are barely visible.  Evidence:  Onsite observation: The pump station located along the pipeline servitude.	None.



No.	Condition	Compliance Status	Finding	Recommendation
1.9.31	Landscaping and architectural design of station structures must be done to ensure that the station blend in with the surrounding area to minimise the visual impact of the station.	С	The landscaping around the station is that of the indigenous grass and vegetation which allows it to blend with the surrounding area. The area is maintained to allow for easy access and monitoring around the stations.  Evidence:  Onsite observation: Evidence of the blending of the Landscape at Stations	None



No.	Condition	Compliance Status	Finding	Recommendation
1.9.32	Stations must be fitted with the required ablution facilities for use by any on site security or operational and maintenance personnel.	С	All stations had the required ablution facilities for use by onsite security or operational and maintenance personnel as was observed during the site walk.  Evidence:  Onsite observation: Evidence of Ablution Facilities (Left) at Pressure Reducing Station	None.



No.	Condition	Compliance Status	Finding	Recommendation
Wetland, R	iver and Stream Crossings			
1.9.33	Construction at wetland, river and stream crossings shall be done in accordance with detailed design drawings for each specific crossing point.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.9.34	Where crossings are required, the approval of the DWA of the engineering design shall be obtained in writing before any construction commence on such sites.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.9.35	All perennial river and stream crossings must be done through	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.



No.	Condition	Compliance Status	Finding	Recommendation
	directional drilling unless otherwise authorised by the DWA. Any crossing by means other than directional drilling must take into consideration the scour effect of the water on the river or stream bottom over time to ensure that the pipe lines will be installed deep enough to remain stable for the lifespan of the pipe lines			
1.9.36	Special care shall be taken when doing any construction work in wetland areas and the area of disturbance shall be kept to the absolute minimum. Sheet flow in wetland areas must not be prevented and the necessary measures to ensure continued sheet flow must be implemented during design of wetland crossings.	N/A	Outside of audit period. The pipeline is now operational. Furthermore, no maintenance activities were observed at wetland, river or stream crossings. Therefore, this condition is not applicable.	None.
1.9.37	All wetland areas, river and stream crossings disturbed during construction must be rehabilitated and inspected by DWA upon completion. Once construction at river, stream or wetland crossings are completed, the relevant DWA official must sign a release form indicating that rehabilitation was done satisfactorily at each crossing point. The release forms must be made available to the	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.

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No.	Condition	Compliance Status	Finding	Recommendation
	Department on request should any dispute arise.			
1.9.38	Vegetation at river and stream bank crossings may be cut and treated with a suitable registered herbicide to prevent further growth and root development. Under no circumstances will de-stumping of trees on river and stream banks be allowed as this may lead to unacceptable erosion except where DWA approves an open trench design to cross a river or stream.	С	The auditor was informed that the inspection team removes vegetation along the servitude including at the river and stream bank crossings. Any exotic looking plants are first confirmed via the main office before they are removed in the correct manner. There was no evidence observed during the site visit of any destumping of trees along the river and stream banks and where trees are evident, specifically at the Vaal River crossing.  Evidence:  Onsite observation: Evidence of Trees at the Vaal River Crossing	None.
1.9.39	River and stream banks must be protected against possible erosion by carefully controlling access and construction activities in such areas.	С	Access control is available at all points leading to crossings with security present to monitor personnel who enter. Furthermore, there are usually at least two locked gates one has to pass before reaching crossings within farm areas.	None.



No.	Condition	Compliance Status	Finding	Recommendation			
			Gabion mattresses are installed on some of the crossings as a means of bank stabilisation and erosion prevention.  Evidence:  Onsite observation: Bermed and Vegetated Riverbanks				
1.9.40	Measures to ensure prevention of pollution or siltation of wetlands or rivers and streams during the construction phase must be implemented by the holder of this authorisation.	N/A	Outside of audit period. The pipeline is now operational. Furthermore, no maintenance activities were observed at wetland, river or stream crossings. Therefore, this condition is not applicable.	None.			
Rehabilitat	Rehabilitation of Works Areas, Laydown Areas and Construction Camps						
1.9.41	All areas disturbed during the construction phase of the project excluding those areas where permanent structures are erected must be rehabilitated fully in accordance with the	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.			



No.	Condition	Compliance Status	Finding	Recommendation		
	recommendations of the specialist ecologist and to the satisfaction of the landowner.					
1.9.42	All works areas must be fully rehabilitated and construction rubble such as overburden and rock excavated during the excavation of the trench must be disposed of or landscaped in such a manner that the servitude area blends in with the surrounding environment. No heaps of overburden may be left on site.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.		
1.9.43	Once construction is completed, all landowners must sign a release form with the ECO indicating that rehabilitation was done satisfactorily and that all outstanding issues or claims have been settled by Petroline. The release forms must be made available to the Department on request should any dispute arise.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.		
Service I	Service Infrastructure					
1.9.44	Disruption of service infrastructure must be kept to an absolute minimum. Should it be necessary to disrupt any services during the construction phase, the affected parties must be	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.		



No.	Condition	Compliance Status	Finding	Recommendation
	informed at least two (2) weeks in advance.			
1.9.45	Should any accidental damage to service infrastructure take place during construction activities, Sasol Gas must take immediate action to restore such disrupted service in the shortest time possible.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.9.46	Any claims for damage to service infrastructure by landowners due to construction activities must be addressed within 30 days from such claim being submitted.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.9.47	Road crossings of the pipe line must be done in accordance with a provincial toads department or South African National Roads Agency Limited (SANRAL) approved design drawing and directional drilling must be implemented at all national, provincial and district road crossings as a minimum to ensure no disruption of traffic.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.9.48	The use of existing roads to gain access to the servitude works area is preferred; however use of any private access roads must be agreed with the landowners in writing. All private roads	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.

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No.	Condition	Compliance Status	Finding	Recommendation
	not to be used for the purpose of construction must be marked clearly with no entry signs.			
1.9.49	Sasol Gas must ensure that contractors adhere to an agreed speed limit on private roads to prevent accidents and road damage.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.9.50	Upon completion of construction all private roads must be rehabilitated to their original condition and to the satisfaction of the landowner.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.9.51	Rail crossings and powerline crossings must be planned in conjunction with Transnet and Eskom and the necessary approvals from these parastatal companies must be obtained prior to construction at such crossings.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.9.52	No fences may be flattened for the purpose of construction without the consent from the landowner. All fence crossings shall be fitted with a proper servitude gate before construction commences to ensure access for the construction teams.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.9.53	Where required deviations of fences may be done with the written consent	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.

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No.	Condition	Compliance Status	Finding	Recommendation
	of the landowner to allow Mr construction activities.			
1.9.54	Upon completion of construction all damage to fencing shall be properly fixed to the satisfaction of the landowners.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None
1.10 Ma	nagement During the Operational Phas	е		
1.10.1	Before commencement of operation the following requirements for the operational phase must be complied with by Sasol Gas:			
1.10.1.1	A major hazard installation (MHI) risk assessment must be completed and approved by the relevant competent authority.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.10.12	Sasol Gas must ensure that all local authorities are aware of the commencement of operation and that the necessary emergency response plans for catastrophic events are in place and approved where required.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.10.2	The operational environmental management of the pipelines servitude must be included in the Sasol Gas environmental	С	Evidence of ISO 14001 certification was provided and confirms Sasol is ISO 14000 certified and has incorporated the EA requirements into the EMS for the management of the pipeline servitude.  Evidence:	None.



No.	Condition	Compliance Status	Finding	Recommendation
	management system (EMS) for pipeline servitudes.		ROAS_ISO14001_BSI Ecertificate_Exp20241227	
1.11 Mo	nitoring of the Construction Activities			
1.11.1	Monitoring of the activity during construction			
1.11.1 .1	The holder of this authorisation must appoint a suitably qualified and responsible person that will act as an environmental control officer (ECO) for the construction period that will have the responsibility of implementing the requirements of the approved construction EMP as well as the conditions of this authorisation.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable	None.
1.11 .1.2	The ECO must be appointed before the start of construction and the Department must be notified of the details and contact numbers of the appointee in writing for record and communication purposes.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable	None.
1.11.1.3	The ECO must compile and present the environmental awareness induction training referred to in 1.9.2.1 above	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable	None.
1.11.1.4	The ECO must inform as affected landowners of the commencement of	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable	None.

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No.	Condition	Compliance Status	Finding	Recommendation
	construction works on their properties at least one week prior to works commencing on their properties.			
1.11.1.5	The ECO must ensure that all landowners are informed of the ECO contact details and must strive to keep landowners informed regarding construction progress.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable	None.
1.11.1.6	The ECO must monitor the construction works on a full time basis to ensure the holder of this authorisation complies with the conditions of this authorisation. Records relating to compliance monitoring must be kept on site and made available for inspection to any relevant and competent authority in respect of this development.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable	None.
1.11.1.7	The ECO must submit a quarterly compliance report, in writing, to The Director: Environmental impact Evaluation and copy the holder of this authorisation with such report. This report shall include a description of all activities on site, problems identified, transgressions noted and remedial action implemented. The report must reflect the DEA reference number of the project on the cover page.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable	None.



No.	Condition	Compliance Status	Finding	Recommendation
1.11.1.8	The ECO must report any significant environmental incident or non-conformance by the holder of this authorisation or any contractor to the Department, attention of the Director: Environmental Impact Evaluation, within 48 hours of such incident or non-conformance and copy the holder of this authorisation with such a report.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable	None.
1.11.1.9	The ECO must maintain the following on site:			
1.11.1.9.1	A site diary.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable	None.
1.11.1.9.2	Copies of all reports submitted to the Department.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable	None.
1.11.1.9.3	A complaints register of all public complaints and the remedies applied to such complaints.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable	None.
1.11.1.10	The ECO must compile a report on all rehabilitation measures implemented for future monitoring and measurement of success of the rehabilitation measures during the operational phase of the development.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable	None.

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No.	Condition	Compliance Status	Finding	Recommendation
1.11.1.11	The ECO must remain employed until all rehabilitation measures as well as site clean-up are completed, the release forms were signed by the landowners and the DWA and the site is handed over to the holder of the authorisation for operation.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable	None.
1.11.2 Mo	nitoring of the Activity During Operatio	n		
1.11.2.1	The holder of this authorization must monitor the operational phase of the development once operation commence as part of the Sasol Gas EMS. The operational phase commence when gas is pumped for the first time.	С	Sasol monitors the pipeline from an inspection and maintenance perspective. There are measures in place to detect any potential leaks and security issues during the operation phase. The gas is dosed with a compound to give it a specific smell for any stakeholders to notice and call the emergency numbers, however, it fizzes out into the atmosphere for majority of the time.  Furthermore, external audits are conducted against the approved Water Use Licence (WUL) for the pipelines every two years. The previous Nature and Business Alliance Africa and WSP external WUL audit reports were available for review.  Evidence:  Ext_WUL_audit_FAD6_2022-06-20  Sasol South Africa Ltd Secunda Commencement notification	None.
1.11.2.2	Should the responsibility for compliance with this authorisation be transferred to any other juristic	N/A	There has been no transfer of responsibility with regards to the EA.	None.

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No.	Condition	Compliance Status	Finding	Recommendation
	person, the transfer of the environmental authorisation from the initial holder of the authorisation to any other juristic person must be formally recorded in writing and a copy of the transfer document indicating the contact details of the juristic person must be submitted to the Director; Environmental Impact Evaluation for record purposes. The transfer document must clearly indicate the DEA reference number.			
Reportin	ng to the Department			
1.12	The holder of the authorisation must submit an environmental compliance audit report to the Department: Attention of the Director: Environmental Impact Evaluation, upon completion of the construction activities as planned for the establishment of the individual pipe lines and associated infrastructure. This report must be submitted after completion of each phase of pipe line construction.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.12.1	The environmental audit report must indicate the date of the audit, the name of the auditor, the DEA project reference number and the outcome of	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.

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No.	Condition	Compliance Status	Finding	Recommendation
	the audit in terms of compliance with the Environmental Authorisation conditions as well as the requirements of the EMP.			
1.12.2	The ECO may compile this report or the holder of this authorisation may appoint an external auditor to compile the report.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.13 Co	mmencement			
1.13.1	The authorised activities may not commence within thirty (30) days of date of signature of this authorisation. Commencement includes site establishment.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.13.2	Should you be notified by the Minister of a suspension of the authorisation pending any appeals decision on the authorised activities, you may not commence with the activities unless authorised by the Minister in writing.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
1.14 No	tification to Authorities			
1.14.1	Thirty (30) days written notice must be given to the Department that construction of the pipe lines will commence. Commencement for the purposes of this condition includes	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.

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No.	Condition	Compliance Status	Finding	Recommendation
	site preparation, The notice must include a date on which it is anticipated that the construction activity will commence.			
1.14.2	Thirty (30) days written notice must be given to the Department that the operational phase of the pipe lines will commence	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
Site Clos	ure and Decommissioning			
1.15	Should the pipe lines ever become redundant and have to be decommissioned, the holder of the authorisation at the time of decommissioning shall undertake the required actions as prescribed by legislation at the time and comply with all relevant legal requirements administered by any relevant and competent authority at that time for the decommissioning phase.	N/A	Outside of audit period. The pipeline is currently operational and not considered redundant. Therefore, this condition is not applicable.	None.
General				
1.16	A copy of this authorisation must be kept at the site office where the development will be undertaken. The authorisation must be produced to any authorized official of the Department who requests to see it and must be	С	Since the pipeline is now operational, there is no site office. The EA is available on the Sasol SharePoint at all times.  Furthermore, no official has requested to see the documentation during the audit period.	None.



No.	Condition	Compliance Status	Finding	Recommendation
	made available for inspection by any employee or agent of the holder of the authorisation who works or undertakes work at the property.			
1.17	Where any of the contact details of the holder of this authorisation change, including the name of the responsible person, the physical or postal address and or telephonic details, the holder of the authorisation must notify the Department as soon as the new details become known.	N/A	There have been no changes in the contact details of the holder over the audit period.	None.
1.18	Upon transfer of the management function of the development the future holder of the authorisation must take ownership of the implementation of the conditions of this environmental authorisation.	N/A	There has been no transfer of the management function of the development over the audit period.	None.
1.19	The holder of the authorisation must notify the Department, in writing and within 48 (forty eight) hours, if any condition of this authorisation cannot be or is not adhered to. Any notification in terms of this condition must be accompanied by reasons for the non- compliance. Non-compliance with a condition of this authorisation may result in criminal prosecution or other actions provided for in the	С	Evidence of previous internal and external audits against the conditions of the EA were provided. No significant incidents were recorded during the audit period for the GNP pipeline.  Evidence:  41102457_20200813_Sasol Gas GNP Pipeline_EA & EMP Audit Report_Final_Signed  41102457_20200813_Sasol Gas GNP Pipeline_WUL Audit Report_Final_Signed  Environmental incidents ROAS	None.

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No.	Condition	Compliance Status	Finding	Recommendation
	National Environmental Management Act, 1998 and the regulations.		<ul> <li>Environmental incident register FY20</li> <li>Incident register_FY21</li> <li>Incident register_FY22_1</li> <li>Incident register_FY23</li> <li>Incident register_FY24</li> </ul>	
1.20	National government, provincial government, local authorities or committees appointed in terms of the conditions of this authorisation or any other public authority shall not be held responsible for any damages or losses suffered by the holder of the authorisation or his successor in title in any instance where construction or operation subsequent to construction be temporarily or permanently stopped for reasons of noncompliance by the holder of the authorisation with the conditions of authorisation as set out in this document or any other subsequent document emanating from these conditions of authorisation.	N/A	Noted.	None.



## 4.2 **ENVIRONMENTAL MANAGEMENT PLAN**

**Environmental Management Plan Auditing Findings Table 4-2:** 

No.	Condition	Compliance Status	Finding	Recommendation		
PLAN	PLANNING AND DESIGN PHASE					
1	Integrity of the Pipelines					
1.1	Design the pipeline in accordance with the international ASMEB31.8 code for material, performance, pressure testing and population class specifications.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
1.2	Design the pipeline in accordance with the international PD8010 code for safety risk classification.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
1.3	Appoint a government approved independent inspection authority to verify the acceptability of construction materials and activities.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
2	2 Undermined Areas, Future Mining and Mineral Reserves					
2.1	Identify all current and future undermined areas along the proposed and alternative pipeline routes through consultation with Sasol Mining, Anglo Coal and South Gold Mining.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		

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No.	Condition	Compliance Status	Finding	Recommendation
2.2	Reroute the gas pipeline to avoid undermined areas.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
2.3	Consult with the Department of Minerals and Energy	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
2.4	The pipelines must not sterilise or influence mineral reserves.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
2.5	The pipelines must not influence future open cast or underground mining operations of Sasol Mining, Anglo Coal and South Gold Mining.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
3	Planning of new Eskom Lethaba	Power Station	between Sasolburg and Deneysville	
3.1	Consult with Eskom.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None
3.2	Avoid the potential locality of the new power station.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None
4	Proximity to Existing Gas Pipelin	nes		
4.1	Stay at least 400 meters away from the three existing gas pipelines (ethylene, ethane and propylene) of Sasol Gas, to avoid stray current interference on the cathodic corrosion protection systems	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None



No.	Condition	Compliance Status	Finding	Recommendation
4.2	Monitor the effectiveness of the cathodic corrosion protection system after commissioning.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None
5	Buying Out of Land			
5.1	If some landowners are not willing to allow servitude across their land, buying of the land by Sasol Gas or its nominee must be considered.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
5.2	The buying must take place on a willing buyer willing seller principle.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
5.3	An independent valuer must value the land.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
6	Planning of Future Roads			
6.1	Consultation must take place with the provincial roads departments of Mpumalanga, Gauteng and Free State.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
6.2	The pipelines' route must be planned in such a way that future road alignments are taken into consideration.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.



No.	Condition	Compliance Status	Finding	Recommendation
7	Localities of Cathodic Corrosion	Protection (Cl	P) System Components	
7.1	Minimum vegetation must be removed for the installation of the cathodic corrosion protection system.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None
7.2	The owner of the land where the components are to be installed must give written approval.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None
7.3	Appropriate servitudes must be negotiated with private landowners.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None
7.4	Right-of-way agreements must be obtained from provincial and municipal landowners.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
8	Locality of Pressure Reducing S	tations (PRS)		
8.1	Minimum vegetation must be removed for the installation of the PRS	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
8.2	The owner of the land where the station is to be installed must give written approval.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
8.3	Appropriate servitudes must be negotiated with private landowners.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.

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No.	Condition	Compliance Status	Finding	Recommendation	
8.4	Right-of-way agreements must be obtained from provincial and municipal landowners	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.	
9	Locality of Pigging Station				
9.1	Minimum vegetation must be removed for the installation of the pigging station	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.	
9.2	The owner of the land where the station is to be installed must give written approval.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.	
9.3	Appropriate servitudes must be negotiated with private landowners.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.	
9.4	Right-of-way agreements must be obtained from provincial and municipal landowners.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.	
9.5	The pigging station must be installed far enough removed from dwellings, to minimise the visual and venting noise impact.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.	
10	Environmental Control Officer (ECO)				
10.1	An environmental control officer must be appointed to do regular	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.	

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No.	Condition	Compliance Status	Finding	Recommendation
	environmental audits during each of the six phases of the project.			
10.2	The ECO must comply with the following requirements:	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
	He/she must be independent from the applicant.			
	He/she must have at least 5 years' experience as environmental assessment practitioner.			
	He/she must be registered with the SA Council for Natural Scientific Professions (SACNASP).			

## Occupational Safety and Health of Construction Workers

1	.1	All the requirements of the Occupational Health and Safety Act (Act No 85 of 1993) must be met.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
1	.2	All the requirements of the Construction Regulations (R.1010 of 18 July 2003) must be met.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
1	.3	The contractor must submit a Health and Safety Plan to Sasol Gas for approval prior to site establishment.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.

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No.	Condition	Compliance Status	Finding	Recommendation
1.4	Daily safety toolbox talks must be held with all construction workers and must be recorded in writing	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
1.5	All construction workers and visitors on site must wear the prescribed personal protective clothing and equipment.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
1.6	All daily inspection registers must be completed as required by the Construction Regulations.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
2	Possible Damage to Utility Servi	ces		
2.1	Right-of-way agreements must be obtained from provincial and municipal roads authorities.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
2.2	The construction contractor must locate all possible utility services prior to excavation work.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
2.3	Written approval for right-of-ways must be obtained from all utility service providers, including Transnet, Rand Water, Telkom, Eskom Transmission, Eskom Distribution, the various local municipalities (Secunda, Balfour and Sasolburg), Transnet Pipelines and Metrorail	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.

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No.	Condition	Compliance Status	Finding	Recommendation	
2.4	The owners of utility services must be notified before excavation is done and requested to send a supervisor to the site.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.	
2.5	If utility services are damaged, the owner of the service must be notified immediately and the service must be repaired to the satisfaction of the owner.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.	
3	Construction Noise				
3.1	Noise caused by construction activities must be minimised.	N/A	Outside of audit period. The pipeline is now operational Therefore, the condition is therefore considered not applicable	None.	
3.2	Construction activities must be limited to daylight hours, between 06:00 and 18:00.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.	
3.3	Adjacent landowners and inhabitants must be notified if excessive noise will be produced.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.	
4	Airborne Emissions				
4.1	All construction vehicles must be maintained in good order to ensure that minimum exhaust smoke and gases are emitted.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.	



No.	Condition	Compliance Status	Finding	Recommendation		
4.2	No open fires must be allowed on site.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
4.3	No waste may be burnt on site.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
4.4	Dust on dirt roads must be suppressed by means of water spraying. A 20% molasses solution may be used to enhance the effectiveness of the dust suppression.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
5	5 Offloading of Heavy Equipment and Machinery					
5.1	No bystanders must be allowed nearby.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
5.2	Traffic must be controlled to avoid disruption.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
5.3	If necessary, the traffic departments of Secunda, Balfour and Sasolburg must be requested for assistance.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
5.4	Roads and access ways must never be blocked.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
5.5	Material and equipment must be stored in a safe place with proper fencing around it and a lockable	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		

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No.	Condition	Compliance Status	Finding	Recommendation
	gate with proper security access control.			
6	Removal and Storage of Topsoil			,
6.1	The top 150 mm layer of soil contains valuable plant nutrients that must be preserved	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
6.2	Removed topsoil must be stored separately and must be replaced last, after bedding, padding and backfilling.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
6.3	Topsoil must be stored in such a manner that wind erosion would be minimised	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
6.4	Topsoil must be stored in such a manner that water erosion would be minimised.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
7	Security of Adjacent Properties			
7.1	Construction workers may not wander off site without permission.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
7.2	The construction contractor must keep a Complaints Register on site in which all complaints from adjacent landowners and inhabitants must be recorded with	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.



No.	Condition	Compliance Status	Finding	Recommendation
	an indication of how and when each complaint was resolve.			
7.3	Land may never be accessed without written approval from the owner or his/her designated representative.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
7.4	The construction worker camp must be located as far as possible away from private residences and buildings.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
7.5	Construction workers must be made aware of the fact that access top private properties without permission is forbidden	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
7.6	A Camp Supervisor must be appointed to manage the workers in the construction camp.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
8	Removal of Fences and Gates			
8.1	Where fences and gates have to be removed for access to the construction area, approval must be obtained from the landowner.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None
8.2	All removed fences and gates must be replaced in the same or better condition.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None

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No.	Condition	Compliance Status	Finding	Recommendation		
9	Damage to Artificial Water Drainage Systems					
9.1	Drainage lines, pipes and canals installed to control storm water flow, may not be damaged.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
9.2	If damage occurred, the owner of the system must be notified and the system must be repaired immediately to the satisfaction of the owner.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
10	Production of Construction Was	te and Spoil				
10.1	Construction waste such as soil, rocks, stones and waste vegetation must be stored separately and neatly where it can cause no harm to people and livestock	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
10.2	Waste vegetation may not be burnt on site	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None		
10.3	Waste trees such as Blue Gum, Black Wattle and Pine may be cut up and donated to local inhabitants as firewood.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None		
10.4	Waste soil must be used as backfill material.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		

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No.	Condition	Compliance Status	Finding	Recommendation	
10.5	Residual waste rocks and stones must be levelled in accordance with the requirements of the landowner and must blend into the natural environment.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.	
11	Xenobiotic Contamination by Fuel, Lubricants and Chemical Substances such as Paint and Solvents				
11.1	Spillages of xenobiotic materials on soil and in water must be avoided.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.	
11.2	If soil is contaminated, the spilled material must immediately be excavated immediately to a depth of 300 mm, segregated in a plastic container and taken to the Holfontein hazardous waste disposal site for further handling.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.	
11.3	Spilled materials may not be treated as general waste.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.	
11.4	No vehicles may be serviced on site.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.	
11.5	When construction vehicles are parked on site, drip trays must be placed under them to catch leaking oil or diesel.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.	



No.	Condition	Compliance Status	Finding	Recommendation
11.6	Xenobiotic substances may never be spilled into a natural water source. In the unlikely event of it happening, the Department of Water Affairs and Forestry must be notified immediately.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
12	Construction Worker Welfare Fac	cilities		
12.1	The construction camp facilities must comply with the Occupational Health and Safety Act.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
12.2	Males and females may not be accommodated in the same camp	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
12.3	Construction workers must be educated about the serious risks of HIV/AIDS and workers must have access to condoms.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
12.4	The conditions in the construction camp must be discussed with all workers during every safety toolbox talk and must be recorded in writing.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
12.5	The Camp Supervisor must complete a daily inspection register in which the following points are checked:	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.



No.	Condition	Compliance Status	Finding	Recommendation
	Food handling facilities.			
	Toilets.			
	Sleeping quarters.			
	Washing facilities, with hot and cold water.			
	No open fires.			
	Mixing of males and females.			
	Storage of dangerous materials.			
	Electrical connections.			
	Facilities to dry washed clothes.			
	Abuse of alcohol and other intoxicating substances.			
13	Visual Effects			
13.1	Equipment and materials must be stored in a demarcated area, as far as possible out of sight for members of the public.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
13.2	Excavated soil, rock and stones must be stored in low heaps to minimise the visual impact.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
13.3	All complaints from interested and affected parties must be recorded in the Complaints Register.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.



No.	Condition	Compliance Status	Finding	Recommendation			
14	14 Rehabilitation of the Construction Area and Spoil Management						
14.1	The construction area must be rehabilitated after completion of the installation of the pipelines and other equipment.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.			
14.2	Each landowner must sign off the rehabilitation work on their properties as acceptable.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.			
14.3	The ECO must sign off the rehabilitation work as acceptable, in accordance with the conditions of the environmental authorisation.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.			
15	Temporary Job Creation						
15.1	This is a positive impact.	N/A	Noted.	OFI:  Prepare an amendment to remove as this, as it is a statement and not a commitment.			
15.2	The construction contractor must endeavour, as far as reasonably practicable, to appoint local labourers for the construction work.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.			



No.	Condition	Compliance Status	Finding	Recommendation
15.3	Local labourers must be trained in the following aspects: How to do the work. Safety and health in the workplace. Environmental protection on the site.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
16	Soil Erosion			
16.1	Soil must be stacked as low as possible to minimise erosion caused by wind.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
16.2	Adequate water drainage must be provided at the construction site to prevent erosion of soil caused by uncontrolled water flow, especially during rainy periods	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
16.3	Silting of natural water sources must be prevented in accordance with the requirements of the water use license issued by the Department of Water Affairs and Forestry.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.



No.	Condition	Compliance Status	Finding	Recommendation
17	Safety of Nearby Communities			
17.1	All open trenches must be barricaded to prevent members of the public and livestock from falling into it.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
17.2	Construction workers may not wander off from the construction site without permission.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
17.3	All construction workers must be made aware of the security requirements of private people.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
18	Crossing of Tar Roads			
18.1	Tar roads must be crossed in accordance with the requirements of the national, provincial and municipal roads authorities.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
18.2	Damage to tar road surfaces, caused by construction vehicles, must be prevented.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
18.3	If caterpillar track machines have to cross tar roads, used lorry tyres must be placed under the tracks to protect the tar surface	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.



No.	Condition	Compliance Status	Finding	Recommendation
18.4	Proper traffic control measures must be exercised to prevent traffic disruption and road accidents.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
19	Safety of Pedestrians Near the C	onstruction Si	te	
19.1	Pedestrian walkways must never be blocked.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
19.2	Adequate and safe bypasses must be provided for pedestrians, where necessary.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
19.3	All open holes and trenches must be barricaded to prevent pedestrians from falling into it.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
20	Allocation of Construction Contr	acts to Local (	Contractors	
20.1	This is a positive impact.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	OFI:  Prepare an amendment to remove as this, as it is a statement and not a commitment.
20.2	The construction contractor must endeavour to allocate subcontracts to local contractors, as far as reasonably practicable.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.

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No.	Condition	Compliance Status	Finding	Recommendation
20.3	The appointment of local subcontractors must be done with due cognisance of the requirements for safety and reliability of the liquid pipelines.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
21	Work Area Restriction			
21.1	Dangerous areas at the construction site must be barricaded to prevent people from entering these areas.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
21.2	Where sensitive areas have been identified such as wetlands or endangered habitat, these areas must be demarcated and barricaded to prevent access by construction workers.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
22	Training of Workers			
22.1	All construction workers must be trained in the following:	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
	How to do their work.			
	Safety and health at the workplace.			
	Environmental protection.			



No.	Condition	Compliance Status	Finding	Recommendation		
22.2	Proper records must be kept of such training.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
23	Interruption of Gas Supply to Customers					
23.1	The supply of gas to commercial and industrial users may not be interrupted.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
23.2	Existing gas pipelines must not be damaged by the construction activities.	N/A	Outside of audit period. The pipeline is now operational Therefore, the condition is therefore considered not applicable.	None.		
23.3	When the new liquid pipelines are tied in and commissioned, supply of gas to customers may not be interrupted.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
24	Disruption of Traffic Flow					
24.1	The normal flow of traffic may not be disrupted by construction activities.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
24.2	If necessary, the traffic departments of Secunda, Balfour or Sasolburg must be requested to assist with the management of traffic.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
24.3	Access roads may never be blocked.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None		

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No.	Condition	Compliance Status	Finding	Recommendation
25	Safety of Bystanders			'
25.1	The construction activities will have spectator value for members of the public and job seekers.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
25.2	Bystanders must be controlled to stay away from the construction activities.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
26	Removal of Vegetation			
26.1	Minimum vegetation must be removed for construction purposes.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
26.2	Waste vegetation may not be burnt on site.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
26.3	Waste vegetation must be taken to a registered waste disposal site for disposal.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
26.4	Waste trees such as Blue Gum, Black Wattle and Pine, may be cut up and provided to members of local communities for firewood	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
26.5	Alien vegetation must be removed manually and not through the use of chemical herbicides.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.

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No.	Condition	Compliance Status	Finding	Recommendation
26.6	Alien vegetation growth along the pipelines construction corridor must be controlled for at least 12 months after completion of construction.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
27	Obstruction of Access Roads			
27.1	Access roads to dwellings, farms, amenities, facilities and public places may not be blocked.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
27.2	If an access road has to be closed temporarily, an alternative safe and convenient route must be provided.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
27.3	All complaints from road users must be recorded in the Complaints Register.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
28	Sand Borrowing			
28.1	River grade sand d will be needed for bedding and padding in the pipelines' trench.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
28.2	Sand must be procured from commercial sand suppliers or excavated soil must be screened to comply the particle size specification.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.

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No.	Condition	Compliance Status	Finding	Recommendation
28.3	Sand borrow pits may not be created along the pipelines' route.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
29 Water Uses				
29.1	68 500 cubic metres of water will be used to test the pipelines hydrostatically.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
29.2	If water for hydrostatic testing of the liquid pipelines are to be abstracted from a natural source, the following written approvals are required:  The Landowner on whose property the water source is situated.  The Department of Water Affairs and Forestry.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
29.3	It is recommended that water for hydrostatic testing be purchased from the nearest local municipality (Secunda, Balfour or Sasolburg).	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
29.4	Water used for hydrostatic testing (waste water) may only be discharged into a natural water source after laboratory analysis has confirmed that the quality complies with the discharge	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.



No.	Condition	Compliance Status	Finding	Recommendation
	specifications of the Department of Water Affairs and Forestry.			
30	Requirements of Local Municipa	lities		
30.1	All the bylaws of local municipalities must be obeyed.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
30.2	All affected municipalities must provide written right-of-ways to the applicant regarding services such as roads, walkways, electricity lines, sewage pipelines and water pipelines.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
31	Crossing of Natural Watercourse	es (Rivers, Spr	uite and Wetlands)	
31.1	An integrated water use license must be obtained from the Department of Water Affairs and Forestry for the crossing of rivers, spruite and wetlands, in accordance with Sections 21 I and (i) of the National water Act (Act 36 of 1998).	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
31.2	All the conditions of the water use license must be met during all phases of the project.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.

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No.	Condition	Compliance Status	Finding	Recommendation
32	Disruption of Learner Activities			
32.1	Learners at farm schools, even in remote areas, may be affected by the construction of the pipelines, in the form of distraction or access to the school.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
32.2	All attempts must be made to avoid disruption of learner activities.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
33.3	If necessary, requirements must be negotiated with the principal of the school.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
34	Disruption of Sporting and Leisu	re Activities		
34.1	The construction of the pipelines and the movement of construction vehicles may affect sporting and leisure activities, such as jogging, quad biking, hiking and fishing.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
34.2	All complaints received from members of the public must be recorded in the Complaints Register and must be resolved immediately.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.



No.	Condition	Compliance Status	Finding	Recommendation		
35	Consent from Affected Landowners					
35.1	Private land may never be accessed without written consent from the landowner	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
35.2	The applicant must negotiate a servitude agreement with each affected landowner	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
35.3	The applicant must appoint an independent land valuer to conduct valuations on all affected land, in terms of land use, crop value and compensation.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
35.4	The applicant must register servitude against the title deed of each affected property.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
36	Directional Drilling					
36.1	Directional drilling must be used as far as reasonably practicable to cross roads, rivers and wetlands.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
36.2	Bentonite used as drilling agent must not be spilled into natural water sources.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		

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No.	Condition	Compliance Status	Finding	Recommendation
37	Disruption of Agricultural Activit	ies		
37.1	The applicant must negotiate a servitude agreement with each affected landowner.	N/A	Outside of audit period. The pipeline is now operational Therefore, the condition is therefore considered not applicable.	None.
37.2	The applicant must appoint an independent land valuer to conduct valuations on all affected land, in terms of land use, crop value and compensation.	N/A	Outside of audit period. The pipeline is now operational Therefore, the condition is therefore considered not applicable.	None.
37.3	Construction on private land may start only after the owner has given written approval.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
37.4	The pipelines must be buried deep enough to allow the farmer to continue with normal agricultural activities above the pipelines.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
37.5	The requirements of the Department of Agriculture must be met.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
38	Land Use			
38.1	The construction strip must be kept as narrow as reasonably practicable, to minimise the environmental footprint and temporary sterilisation of land	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.

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No.	Condition	Compliance Status	Finding	Recommendation
38.2	The construction and operation of the pipelines must not necessitate the rezoning of land.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
38.3	The pressure reducing station, valve boxes, telemetry equipment and pigging station must be located in an area where normal land use would not be affected.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
38.4	The contours of agricultural land must be preserved.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
38.5	Water drainage furrows constructed by landowners on agricultural land must not be altered or damaged in any way.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
39	Heritage Artefacts			
39.1	Archaeological artefacts discovered during construction must be labelled and preserved.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
39.2	If the presence of artefacts is noted during excavation of the trench, excavation work must be stopped immediately and the SA Heritage Resources Agency (SAHRA) must be notified.	N/A	Outside of audit period. The pipeline is now operational Therefore, the condition is therefore considered not applicable.	None.



No.	Condition	Compliance Status	Finding	Recommendation		
39.3	All further excavation work must be done under direct supervision of a qualified archaeologist or palaeontologist	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
39.4	Artefacts must never be destroyed or damaged.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
40	40 Heritage Sites					
40.1	The pipelines' route must avoid all gravesites.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
40.2	No heritage object may be removed or altered to make way for the liquid pipelines.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
40.3	The pipelines' route must avoid all heritage objects and sites.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		
41	41 Cathodic Corrosion Protection System					
41.1	The sacrificial beds must be installed in places away from rivers and wetlands so that aquatic species would not be affected.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.		



No.	Condition	Compliance Status	Finding	Recommendation
REH	ABILITATION PHASE			
1	The Construction Area must be l	Rehabilitated		
1.1	Rehabilitation must take place in accordance with all the requirements of the various authorities.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None
1.2	Written approval for all rehabilitation work must be obtained in writing from affected landowners	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
1.3	Rehabilitation must take place in accordance with all the conditions of the environmental authorisation.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
2	Management of Construction Sp	oil		
2.1	Excavated soil must be used as backfill for the trench, as far as possible.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
2.2	Residual soil must be landscaped in such a way that it blends in with the natural environment.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
2.3	Rocks and stones must be levelled and spread to blend in with the natural environment.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.



No.	Condition	Compliance Status	Finding	Recommendation
2.4	Residual soil must be used to create berms to control storm water flow and to prevent soil erosion.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
2.5	Soil must temporarily be stacked during construction in such a way that wind erosion will be minimised i.e. keep the stack height as low as possible.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.

### **COMMISSIONING PHASE**

#### Methane Gas will be Vented to Atmosphere to Purge the Pipeline 1

	3				
1.1	The estimated volume of methane that will be vented is 68 500 normal cubic metres.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.	
1.2	Methane is a greenhouse gas that contributes to global warming.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.	
1.3	The volume of methane vented must be kept as low as possible.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.	
1.4	Venting must be done when atmospheric conditions are unstable, such as during windy periods and at an elevated ambient temperature	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.	

SASOL GNP GAS PIPELINE ENVIRONMENTAL AUTHORISATION AND ENVIRONMENTAL MANAGEMENT PLAN - EA REFERENCE 12/12/20/1067



No.	Condition	Compliance Status	Finding	Recommendation
1.5	Venting must be avoided at night	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
1.6	Venting must be done under closely controlled conditions at points where there is no large concentration of people	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
1.7	The Chief Air Pollution Control Officer of the Department of Environmental Affairs and Tourism must be notified in writing about the venting at least 30 days in advance.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
2	Testing of Equipment at the Gas	User		
2.1	The applicant must certify the equipment at the endpoint gas user as suitable and compatible for use on the gas from the pipeline, prior to commissioning of the gas pipeline	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.
2.2	The applicant must ensure that all the user equipment is safe for use prior to commissioning of the gas pipeline.	N/A	Outside of audit period. The pipeline is now operational. Therefore, the condition is therefore considered not applicable.	None.



No.	Condition	Compliance Status	Finding	Recommendation
OPE	RATION PHASE			
1	Stormwater Run-off			
1.1	Storm water run-off from the construction strip, pigging station and pressure reducing station must be controlled at all times, especially during heavy rainfall periods.	С	Following the construction phase, the whole pipeline servitude was rehabilitated and stormwater runoff measures put in place to prevent uncontrolled runoff during heavy rainfall periods. The river banks were stabilised and the servitude is vegetated thus controlling stormwater flow. High risk areas such as crossings have gabion mattresses installed to control the flow of water as was observed during the site walk.  Evidence:  Onsite observation: Evidence of Gabion Mattress at Crossing	None.
1.2	Where slopes exist at the site after construction, berms must be built to channel storm water in the right	С	The whole pipeline servitude was rehabilitated and stormwater runoff measures put in place to prevent uncontrolled runoff during heavy rainfall periods. The river banks were stabilised and the servitude is vegetated thus	None



Condition	Compliance Status	Finding	Recommendation
direction so that soil erosion can be prevented.		controlling stormwater flow. High risk areas such as crossings have gabion mattresses installed to control the flow of water as was observed during the site walk.	
		Bank stabilisation ensured that the banks are bermed to help prevent soil erosion in conjunction with the surrounding vegetation.	
		Evidence:	
		<ul><li>Onsite observation: Evidence of Gabion Mattress at Crossing</li></ul>	
Rocks and stones from construction spoil can be used as barriers to retard and redirect storm water flow.	С	The auditor was informed that rocks and stones from construction spoil were used as part of rehabilitation to be barriers and retard and redirect stormwater flow as required. This was as observed during the site walk and Sasol confirmed this during the site visit.  Evidence:	None.
	Rocks and stones from construction spoil can be used as barriers to retard and redirect	Rocks and stones from construction spoil can be used as barriers to retard and redirect  Status  C	direction so that soil erosion can be prevented.  Controlling stormwater flow. High risk areas such as crossings have gabion mattresses installed to control the flow of water as was observed during the site walk.  Bank stabilisation ensured that the banks are bermed to help prevent soil erosion in conjunction with the surrounding vegetation.  Evidence:  Onsite observation: Evidence of Gabion Mattress at Crossing  Rocks and stones from construction spoil can be used as barriers to retard and redirect stormwater flow.  Construction spoil can be used as barriers to retard and redirect stormwater flow as required. This was as observed during the site walk and Sasol confirmed this during the site visit.

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No.	Condition	Compliance Status	Finding	Recommendation
1.4	All storm water control measures on private land must be approved in writing by the landowner before it may be implemented.	N/A	Stormwater control measures were approved during the construction phase. The pipeline is now operational after rehabilitation was completed before commissioning. Therefore, this condition is not applicable.	None.
2	Stimulation of the Economy			
2.1	This is a positive impact.	N/A	Noted. This is a statement and not a mitigation measure.	OFI: Prepare an amendment to remove as this, as it is a statement and not a commitment.
2.2	The applicant must expedite construction work to commission the pipelines as soon as possible, without compromising the quality of the work.	N/A	Outside of audit period. The pipeline is now operational Therefore, this condition is not applicable.	None.
2.3	The applicant must make all attempts to promote the use of natural gas as alternative industrial energy source in South Africa	С	The GNP gas pipeline was installed to help promote the use of natural gas as an alternative industrial energy source in South Africa. <u>Evidence:</u> (18)1.16-ROD_2009 secunda-sasolburg_GNP	None
3	Poverty Relief			
3.1	This is a positive impact.	N/A	Noted. This is a statement and not a mitigation measure.	OFI: Prepare an amendment to remove as this, as it is

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No.	Condition	Compliance Status	Finding	Recommendation
				a statement and not a commitment.
3.2	Temporary jobs must be created during construction.	N/A	Outside of audit period. The pipeline is now operational.	None
3.3	The skills of temporary workers must be developed.	N/A	Sasol has permanent operational teams from an inspection and maintenance perspective who are trained on their tasks. The only temporary workers are those of contractors who come to perform specialist activities, and these are trained within their own organisations.	None
3.4	The applicant must make all attempts to promote the use of natural gas as alternative household energy source in South Africa.	С	The GNP gas pipeline was installed to help promote the use of natural gas as an alternative industrial energy source in South Africa.  Evidence:  (18)1.16-ROD_2009 secunda-sasolburg_GNP	OFI: This is a duplication of commitment 2.3. An amendment can be sought to have this condition removed.
4	Soil Erosion			
4.1	Excavated soil must be stacked in heaps low enough to minimise wind erosion.	N/A	Outside of audit period. The pipeline is now operational. Therefore, this condition is not applicable.	None.
4.2	Silting of rivers and streams must be avoided.	С	Following the construction phase, the whole pipeline servitude was rehabilitated and stormwater runoff measures put in place to prevent uncontrolled runoff during heavy rainfall periods. The river banks were stabilised and the servitude is vegetated thus controlling stormwater flow. High risk areas such as crossings have gabion mattresses installed to control the flow of water as was observed during the site walk.	None.



No.	Condition	Compliance Status	Finding	Recommendation
			Bank stabilisation ensured that the banks are bermed to help prevent soil erosion in conjunction with the surrounding vegetation.  Evidence:  Onsite Observation: Evidence of Bermed and Vegetated River Banks	
4.3	Storm water must be controlled in such a way that it will not cause soil erosion.	С	Following the construction phase, the whole pipeline servitude was rehabilitated and stormwater runoff measures put in place to prevent uncontrolled runoff during heavy rainfall periods. The river banks were stabilised and the servitude is vegetated thus controlling stormwater flow. High risk areas such as crossings have gabion mattresses installed to control the flow of water as was observed during the site walk.  Bank stabilisation ensured that the banks are bermed to help prevent soil erosion in conjunction with the surrounding vegetation.  Evidence:  Onsite Observation: Evidence of Bermed and Vegetated River Banks	None.



No.	Condition	Compliance Status	Finding	Recommendation
4.4	Where soil erosion could be a problem, such as against slopes and along riverbanks, berms must be created with construction spoil (soil, stones and rocks) to divert and retard the water flow.	С	Berms were created using soil and stones as was observed to prevent erosion specifically at stream crossings and at locations where vehicles cross over to the other side of the banks.  Evidence:  Onsite Observation: Stabilised Banks and Stormwater Control	None.



No.	Condition	Compliance Status	Finding	Recommendation
5	Handling of Emergency Situation	าร		
5.1	The applicant must update its existing Emergency Management Plan to make provision for the new gas pipelines.	N/A	There have been no new gas pipelines planned for the servitude, therefore, there is no requirement to update the Emergency Management Plan.	None.
5.2	Emergency situations along the gas pipelines must be managed by the applicant, in collaboration with the local authorities in Secunda, Balfour and Sasolburg.	N/A	There have been no emergency situations along the gas pipeline over the audit period.	None.
5.3	The recommendations of the major hazard installation risk assessor must be applied.	С	Safeguards have been put in place to manage the pipeline as required. Sasol monitors the pipeline from an inspection and maintenance perspective. There are measures in place to detect any potential leaks (SCADA stations) and security issues during the operation phase. The gas is dosed with a compound to give it a specific smell for any stakeholders to notice and call the emergency numbers, however, it fizzes out into the atmosphere for majority of the time.	None.
			Furthermore, pressure reducing stations are installed at intervals along the servitude to allow for isolation of the pipeline during maintenance and for any work to be conducted. Cathodic protections are in place to prevent possible flames / fires from developing due to static charges. Finally, Sasol engages with local communities in alerting them of the procedures to take in the case of emergency situations as well as providing emergency numbers along the pipeline servitude.	
			<ul> <li><u>Evidence:</u></li> <li>Onsite Observation: Evidence of Emergency Numbers Along the Servitude and Pumpstations</li> </ul>	

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No.	Condition	Compliance Status	Finding	Recommendation
			SNI & GNP REPORT  1b-Leak detection (SCADA): GNP Control Philosophy Report - Rev 1  GNE SNI Specialist Study MHI 18 Feb 09  Risk Register Worksheet rev 5	
6	Safe and Reliable Operation of the	ne Gas Pipeline	9	
6.1	The applicant must compile a maintenance schedule and register for the new gas pipelines.	С	Sasol have a maintenance team that focuses on fixing any defects along the pipeline servitude, however, the maintenance schedule was not available for review. An inspection schedule was provided as evidence, showing both route inspection and helicopter inspection dates.  Evidence:	None.
			SNI & GNP Report	
6.2	The pipelines must be inspected at least once per month by foot, vehicle or helicopter and the inspection findings must be recorded in a register.	С	The auditor was informed that inspections are conducted along the pipeline servitude mainly using vehicles. Findings are recorded on a register kept by the inspection team. However, the inspection schedule and register were not available to confirm that this is done on a monthly basis as required.  Evidence:	None.



No.	Condition	Compliance Status	Finding	Recommendation
			SNI & GNP Report	
6.3	The pipelines must be pigged with intelligent pig in accordance with the maintenance schedule.	С	The auditor was informed that the pipeline is pigged with intelligent pigs as per the schedule.  Evidence:  SNI & GNP Report	None.
6.4	The applicant must consider the installation of solar-powered gas detectors at residences that are located close to the gas pipeline.	N/A	Sasol reviewed this and saw it as unnecessary due to the measures it had put in place along the servitude are considered sufficient. However, regular engagement is conducted with residents to ensure they are aware of the emergency procedure.	OFI:  Motivate to have this condition removed through an amendment process.
6.5	The applicant must consider the provision of safety equipment such as gas masks to inhabitants of houses near the gas pipeline	N/A	Sasol reviewed this and saw it as unnecessary due to the measures it had put in place along the servitude are considered sufficient. However, regular engagement is conducted with residents to ensure they are aware of the emergency procedure.	OFI:  Motivate to have this condition removed through an amendment process.
6.6	The applicant must consider the placement of warning signs at houses that are located near the gas pipeline.	С	Signs are placed at the pipeline markers along the servitude and at the gates of some of the private areas used to gain access to the site. This was as observed during the site visit.  Evidence:  Onsite Observation: Signs Along Pipeline Markers	None.

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No.	Condition	Compliance Status	Finding	Recommendation
6.7	The applicant must consider the provision of abbreviated emergency procedures to inhabitants of houses or public facilities that are located near the gas pipeline, including emergency contact numbers.	С	The auditor was informed that Sasol conducts in-depth consultation and issues brochures and information pamphlets when any information changes. Furthermore, pipeline markers at regular intervals have emergency information signs on them for use by local residents.  Evidence:  Onsite Observation: Signs Along Pipeline Markers	None.
6.8	The applicant must design a communication campaign and implement it on a continuous basis, to inform and educate members of communities along	С	The auditor was informed that Sasol conducts in-depth consultation and issues brochures and information pamphlets when any information changes. Evidence of the ongoing Environmental Awareness Training has been provided accompanied by the respective attendance registers., showing that community members were in attendance.	None.



No.	Condition	Compliance Status	Finding	Recommendation
	the pipelines' route about the following aspects:  Advantages and disadvantages of the pipelines.  Dangers related to the pipelines.  Roles and responsibilities of the communities in case of a safety emergency.  Involvement of the communities in emergency drills.  Continuous liaison with the applicant.		<ul> <li>Evidence:</li> <li>Pipeline Safety Awareness Presentation eMalahleni 19.10.2023</li> <li>ATTENDANCE REGISTERS FOR PIPELINE SAFETY AWARENESS SESSION 19.10.2023</li> <li>Pipeline Safety Awareness Presentation eMalahleni 15.11.2023</li> <li>ATTENDANCE REGISTERS FOR PIPELINE SAFETY AWARENESS SESSION 15.11.2023</li> </ul>	
7	Control of Alien Vegetation			
7.1	Alien vegetation along the construction strip must be eradicated manually.	N/A	The pipeline has been in operation for years and the required eradication of alien vegetation and subsequent inspection, 12 months after construction of the pipeline, falls outside the current audit period.	None
7.2	Chemical herbicides may not be used.			
7.3	The pipelines construction strip must be inspected 12 months after completion of construction, to ensure that all alien vegetation has been eradicated from the disturbed soil.			



No.	Condition	Compliance Status	Finding	Recommendation
8	Permanent Servitudes			
8.1	Permanent servitudes must be registered against the title deeds of private properties, with the written consent of the landowner.	N/A	Outside of audit period. This was done during the planning phase. Therefore, this condition is not applicable.	None
8.2	The conditions of the servitude would be binding on the landowner.	N/A	Noted.	None.
8.3	The landowners are not allowed to build any structures on the servitude strip.	С	There were no structures along the servitude strips as observed during the site visit.  Evidence:  Onsite Observation: Example of No Structures Along Servitude Strip	None.
8.4	Normal agricultural activities may continue above the buried pipelines.	С	Normal agricultural activities are still ongoing above the buried pipelines as was observed during the site visit. <u>Evidence:</u>	



No.	Condition	Compliance Status	Finding	Recommendation
			Onsite Observation: Maize Field Over Buried Pipeline	
8.5	No deep-rooted trees may be planted in the servitude strip, because it may damage the pipelines in time.	С	There were no deep-rooted trees observed along the servitude trips. Furthermore, there have been no incidents related to damage from any plant roots.  Evidence:  Onsite Observation: no deep-rooted trees observed along the servitude trips	None.



No.	Condition	Compliance Status	Finding	Recommendation			
1	Flushing of the Redundant Pipel	Flushing of the Redundant Pipelines					
1.1	Decommissioning of the new liquid pipelines are unlikely to occur in 30 years after commissioning.	N/A	Outside of audit period. There are no plans to decommission the pipeline is the foreseeable future. Therefore, this condition is not applicable.	None.			
1.2	All methane must be flushed from the pipeline through the use of nitrogen. Air may not be used for methane flushing	N/A	Outside of audit period. There are no plans to decommission the pipeline is the foreseeable future. Therefore, this condition is not applicable.	None.			
1.3	All residual nitrogen must be flushed from the pipelines with air.	N/A	Outside of audit period. There are no plans to decommission the pipeline is the foreseeable future. Therefore, this condition is not applicable.	None			
1.4	Gas measurements must be done on the pipeline contents to ensure that all methane has been removed.	N/A	Outside of audit period. There are no plans to decommission the pipeline is the foreseeable future. Therefore, this condition is not applicable.	None			
1.5	Flushing of methane must be done during unstable atmospheric conditions such as a windy period and an elevated ambient temperature.	N/A	Outside of audit period. There are no plans to decommission the pipeline is the foreseeable future. Therefore, this condition is not applicable.	None.			
1.6	Methane flushing must not be done during the night. Methane flushing must not be done at points where a large number of people are gathered.	N/A	Outside of audit period. There are no plans to decommission the pipeline is the foreseeable future. Therefore, this condition is not applicable.	None.			
2	Safety of the Abandoned Pipelin	е					



No.	Condition	Compliance Status	Finding	Recommendation		
2.1	The empty pipelines, flushed from methan,e must be declared safe by an approved inspection authority.	N/A	Outside of audit period. There are no plans to decommission the pipeline is the foreseeable future. Therefore, this condition is not applicable.	None.		
2.2	The end points of the pipelines and all tie-in points must be welded and sealed.	N/A	Outside of audit period. There are no plans to decommission the pipeline is the foreseeable future. Therefore, this condition is not applicable.	None.		
2.3	The cathodic corrosion control system must be disconnected and removed from the pipelines.	N/A	Outside of audit period. There are no plans to decommission the pipeline is the foreseeable future. Therefore, this condition is not applicable.	None.		
3	Creation of an Artificial Water Duct					
3.1	Water must not be allowed to enter the unused pipelines.	N/A	Outside of audit period. There are no plans to decommission the pipeline is the foreseeable future. Therefore, this condition is not applicable.	None.		
3.2	The applicant must inspect the pipelines at least once every six months to look for signs of water flow through it.	N/A	Outside of audit period. There are no plans to decommission the pipeline is the foreseeable future. Therefore, this condition is not applicable.	None.		
4	Alternative Use of the Redundant Pipeline					
4.1	The applicant must consider donating the redundant pipelines to a local municipality for water transportation, provided that the municipality would declare the water quality safe for its intended use.	N/A	Outside of audit period. There are no plans to decommission the pipeline is the foreseeable future. Therefore, this condition is not applicable.	None.		

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No.	Condition	Compliance Status	Finding	Recommendation
4.2	The servitude across the land for the pipelines must be deregistered against the title deed.	N/A	Outside of audit period. There are no plans to decommission the pipeline is the foreseeable future. Therefore, this condition is not applicable.	None.



#### 5 SUMMARY OF THE AUDIT FINDINGS

#### 5.1 **ENVIRONMENTAL AUTHORISATION**

The results of the audit are outlined in full in **Section 4**. This summary provides a brief overview of the key findings regarding compliance with the EA conditions, with associated timeframes recommended for compliance.

A total of 103 conditions were audited for compliance. As indicated below, 91 of the conditions were noted as not applicable, leaving 12 applicable conditions audited. Table 5-1 shows the overall compliance levels noted because of the audit findings outlined in this report.

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

Section of the EA	No. Commitments	С	NC	NA
Scope of Authorisation	7	2	0	5
Appeal of Authorisation	5	0	0	5
Management during the Construction Phase	10	0	0	10
Servitude Works Area and Pipe Laydown Areas	12	0	0	12
Construction Camps	7	0	0	7
Workshop Areas at Construction Camps	5	0	0	5
Pressure Reducing Stations and Pigging Stations	4	4	0	0
Wetland, River and Stream Crossings	8	2	0	6
Rehabilitation of Works Areas, Laydown Areas and Construction Camps	3	0	0	3
Service Infrastructure	11	0	0	11
Management During the Operational Phase	3	1	0	2
Monitoring of the Construction Activities	13	0	0	13
Monitoring of the Activity During Operation	2	1	0	1
Reporting to the Department	3	0	0	3
Commencement	2	0	0	2
Notification to Authorities	2	0	0	2
Site Closure and Decommissioning	1	0	0	1
General	5	2	0	3
Total Count	103	12	0	91
Total Percentage		12%	0%	88%
Compliance with Applicable Conditions		100%		

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Figure 5-1 below illustrates the number/count contribution of the findings of the EA per section.

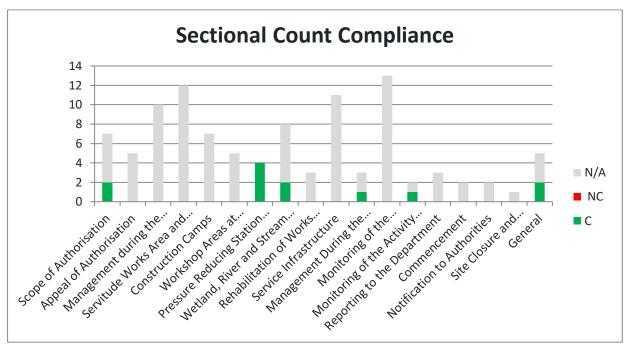


Figure 5-1: Number/Count contribution of findings made to the EAAA conditions per Section

Figure 5-2 below presents the total proportion of compliance for the pipeline.

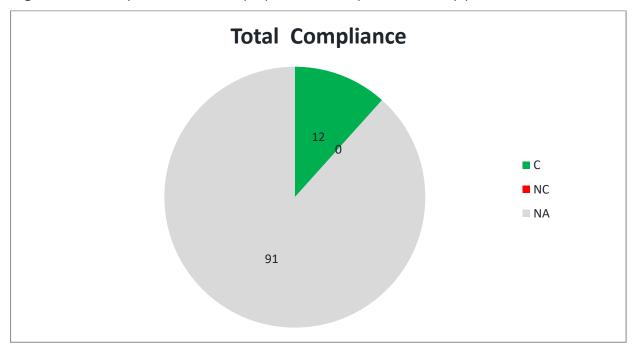


Figure 5-2: Overall count findings on compliance to the EA conditions

Figure 5-3 below illustrates the percentage contribution of the findings of the EA conditions.



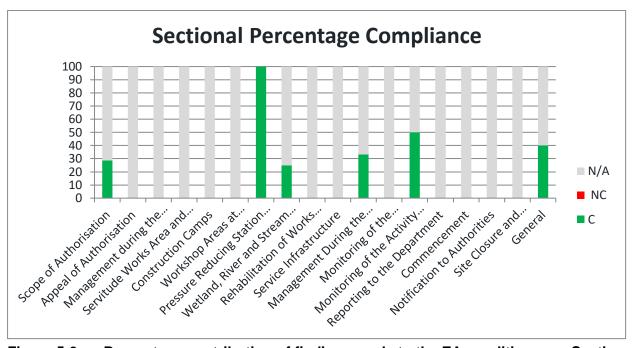
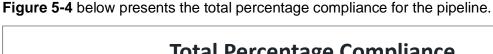


Figure 5-3: Percentage contribution of findings made to the EA conditions per Section



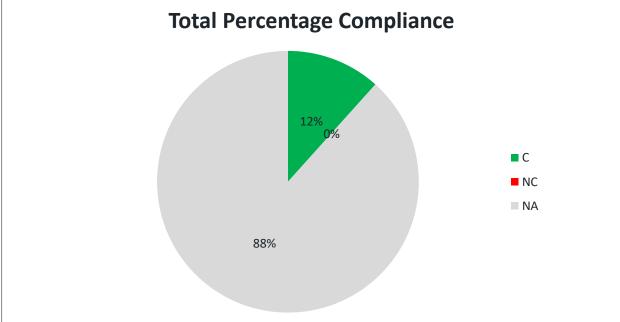


Figure 5-4: Overall percentage findings on compliance to the EA conditions

The non-compliant findings and observations should be investigated, and corrective and preventative actions should be conveyed to the external auditor during the next EA audit.



# 5.2 ENVIRONMENTAL MANAGEMENT PROGRAMME

The results of the audit are outlined in full in **Section 4**. This summary provides a brief overview of the key findings regarding compliance with the EMPr conditions, with associated timeframes recommended for compliance.

A total of 235 conditions were audited for compliance. As indicated below, 215 of the conditions were noted as not applicable, leaving 20 applicable conditions audited. **Table 5-2** shows the overall compliance levels noted because of the audit findings outlined in this report.

Table 5-2: Summary of EMPr Compliance Audit Findings

Section of the EMPr	No. Commitments	С	NC	NA
Planning and Design Phase	32	0	0	32
Construction Phase	139	0	0	139
Rehabilitation Phase	8	0	0	8
Commissioning Phase	9	0	0	9
Operation Phase	32	18	0	14
Decommissioning / Closure Phase	13	0	0	13
Total Count	233	18	0	215
Total Percentage		8%	0%	92%
Compliance with Applicable Conditions		100%		

**Figure 5-5** below illustrates the number/count contribution of the findings of the EMPr per section.

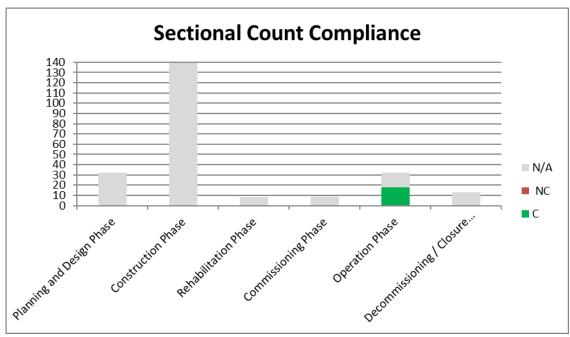


Figure 5-5: Number/Count contribution of findings made to the EMPr conditions per Section



**Figure 5-6** below presents the total proportion of compliance for the pipeline.

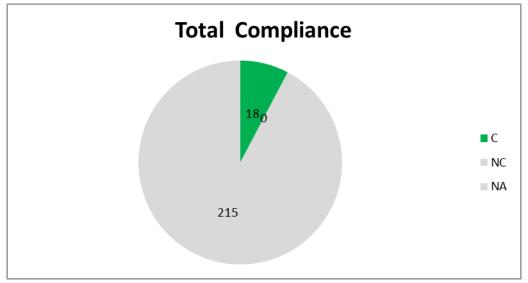


Figure 5-6: Overall count findings on compliance to the EMPr conditions

**Figure 5-7** illustrates the percentage contribution of the findings of the EMPr conditions.

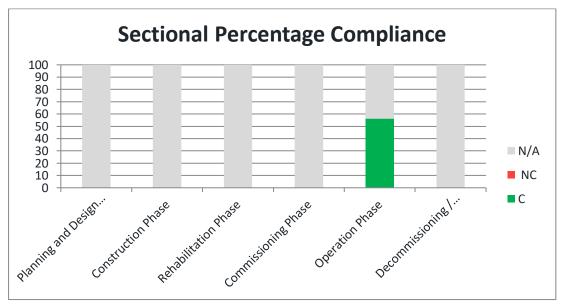


Figure 5-7: Percentage contribution of findings made to the EMPr conditions per Section



**Figure 5-8** below presents the total percentage compliance for the pipeline.

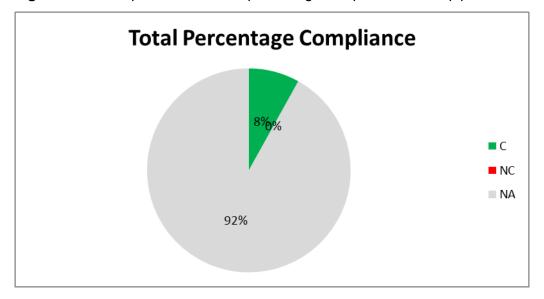


Figure 5-8: Overall percentage findings on compliance to the EMPr conditions

The non-compliant findings and observations should be investigated and corrective and preventative actions should be conveyed to the external auditor during the next EMPr audit.

# 5.3 CLOSE OUT OF PREVIOUS AUDIT FINDINGS

## 5.3.1 ENVIRONMENTAL AUTHORISATION

**Figure 5-9** provides a summary of the audit findings from the 2020 and the current audit (2024). The graph below shows that compliance has improved with the pipeline being fully compliant.

The audit findings are included in **Table 5-3**.

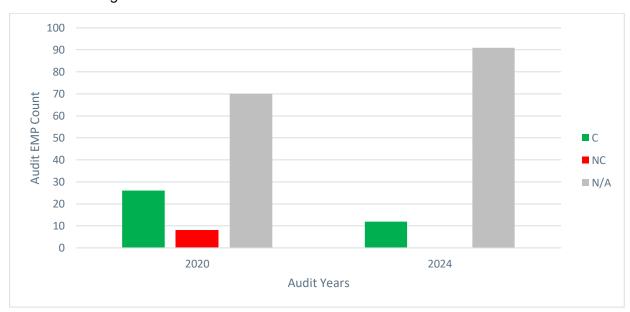


Figure 5-9 - Compliance Comparison EA (2020 - 2024)



Table 5-3 - Compliance comparison EA (2020-2024)

Condition	Previous Compliance Level	Current Compliance Level	Finding and Recommendation (2024)
Condition 1.2 The holder of this authorisation shall be responsible for ensuring compliance with the conditions of this authorisation by any person acting on his or her behalf, including but not limited to, an agent, sub-contractor, employee or person rendering a service to the holder of the authorisation.	NC	С	Sasol keeps track record of any monitoring against the EA conditions to ensure compliance, including inspection schedules, external audit reports. No further recommendations are required.
Condition 1.9.2.6  Measures to ensure public access to any homesteads or amenities must at all times be guaranteed and shall not be restricted due to this development. Where use is made of private access roads to gain access to the construction site, use of such roads must be negotiated with the affected landowners and speed limits on such roads must be enforced on all construction vehicles. All access roads used by the contractors must be reinstated to their original condition if any damage is caused to such roads.	С	N/A	Compliance with this condition is not applicable since the pipeline is now operational.
Condition 1.9.41 All areas disturbed during the construction phase of the project excluding those areas where permanent structures are erected must be rehabilitated fully in accordance with the recommendations of the specialist ecologist and to the satisfaction of the landowner.	С	N/A	Compliance with this condition is not applicable since the pipeline is now operational.
Condition 1.9.48 The use of existing roads to gain access to the servitude works area is preferred; however, use of any private access roads must be agreed	С	N/A	Compliance with this condition is not applicable since the pipeline is now operational.



Condition	Previous Compliance Level	Current Compliance Level	Finding and Recommendation (2024)
with the landowners in writing. All private roads not to be used for the purpose of construction must be marked clearly with no entry signs.			
Condition 1.10.2 The operational environmental management of the pipelines servitude must be included in the Sasol Oil environmental management system (EMS) for pipeline servitudes.	NC	С	Evidence of ISO 14001 certification was provided and confirms Sasol is ISO 14000 certified and has incorporated the EA requirements into the EMS for the management of the pipeline servitude. No further recommendations are required.
Condition 1.16 A copy of this authorisation must be kept at the site office where the development will be undertaken. The authorisation must be produced to any authorized official of the Department who requests to see it and must be made available for inspection by any employee or agent of the holder of the authorisation who works or undertakes work at the property.	N/A	С	Since the pipeline is now operational, there is no site office. The EA is available on the Sasol SharePoint at all times. Furthermore, no official has requested to see the documentation during the audit period.
Condition 1.19 The holder of the authorisation must notify the Department, in writing and within 48 (forty eight) hours, if any condition of this authorisation cannot be or is not adhered to. Any notification in terms of this condition must be accompanied by reasons for the non- compliance. Non-compliance with a condition of this authorisation may result in criminal prosecution or other actions provided for in the National Environmental Management Act, 1998 and the regulations.	N/A	С	Evidence of previous internal and external audits against the conditions of the EA were provided. No significant incidents were recorded during the audit period for the GNP pipeline.



### 5.3.2 ENVIRONMENTAL MANAGEMENT PLAN

Figure 5-14 provides a summary of the audit findings from the 2020 and the current audit (2024). The graph below shows that compliance improved with only one condition being identified as non-compliant.

The audit findings are included in **Section 4.2** of this report.

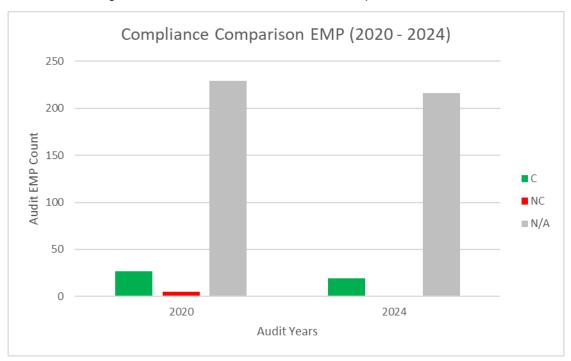


Figure 5-10 - Compliance Comparison EMP (2020 - 2024)

Table 5-4 - Compliance comparison EMP (2020-2024)

Condition	Previous Compliance Level	Finding and Recommendation (2020)	Current Compliance Level	Finding and Recommendation (2024)
Condition 6.1  The applicant must compile a maintenance schedule and register for the new gas pipelines.	NC	Sasol have a maintenance team that focuses on fixing any defects along the pipeline servitude, however, the maintenance schedule was not available for review. Provide the maintenance schedule and register as required.	С	Sasol have a maintenance team that focuses on fixing any defects along the pipeline servitude, however, the maintenance schedule was not available for review. An inspection schedule was provided as evidence, showing both route inspection and helicopter inspection dates. No further recommendations required.



Condition 6.2  The pipelines must be inspected at least once per month by foot, vehicle or helicopter and the inspection findings must be recorded in a register.		The auditor was informed that inspections are conducted along the pipeline servitude mainly using vehicles. Findings are recorded on a register kept by the inspection team. However, the inspection schedule was not available to confirm that this is done on a monthly basis as required.  Provide the inspection schedule to indicate the frequency at which inspections are conducted.	С	The auditor was informed that inspections are conducted along the pipeline servitude mainly using vehicles. Findings are recorded on a register kept by the inspection team and was provided as evidence. No further recommendations required.
Condition 6.3  The pipelines must be pigged with intelligent pigs in accordance with the maintenance schedule.	NC	The auditor was informed that the pipeline is pigged with intelligent pigs as per the schedule, however, the maintenance schedule was not available for review.  Provide the maintenance schedule and register as required.	С	The auditor was informed that the pipeline is pigged with intelligent pigs as per the schedule provided. No further recommendations required.
Condition 6.8  The applicant must design a communication campaign and implement it on a continuous basis, to inform and educate members of communities along the pipelines' route about the following aspects:  Advantages and disadvantages of the pipelines.  Dangers related to the pipelines.  Roles and responsibilities of the communities in case of a safety emergency.  Involvement of the communities		The auditor was informed that Sasol has a communication plan to be implemented on a continuous basis to inform and educate members of communities along the pipelines' route. However, this plan was not provided for review.  Provide the communication campaign plan and proof of recent communication with the stakeholders.	С	The auditor was informed that Sasol conducts in-depth consultation and issues brochures and information pamphlets when any information changes. Evidence of the ongoing Environmental Awareness Training has been provided accompanied by the respective attendance registers., showing that community members were in attendance. No further recommendations required.



in emergency drills.  Continuous liaison with the applicant.					
Condition 7.1  Alien vegetation along the construction strip must be eradicated manually.	С	Alien vegetation is removed along the pipeline servitude during servitude inspections as per the inspection schedule. This is done manually as required. The majority of the pipeline servitude was observed to be free of alien vegetation.	N/A	The pipeline has been in operation for years and the required eradication of alien vegetation and subsequent inspection, 12 months after construction of the pipeline, falls outside the current audit period.	
Condition 7.2 Chemical herbicides may not be used.	С	Alien vegetation was observed throughout the pipeline servitude. However, Sasol did inform the auditor that the removal of alien vegetation is done manually as required and is removed as per the inspection schedule. However, there was no signs of use of chemical herbicides in the form of evidence of chemical remnants, therefore the condition is noted as complaint.	N/A		

### 5.3.3 EFFECTIVENESS OF THE EMPR

Section 34 and Appendix 7 of the EIA Regulations 2014 (as amended) requires an assessment of the adequacy and effectiveness of the EMPr as part of the audit scope, as follows:

- Assess the extent to which the avoidance, management and mitigation measures provided for in the EMPr, 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 EMPr;
- Identify shortcomings in the EMPr; and
- Identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr.

The EMPr compliance audit has identified that approximately 91% of the listed measures are no longer applicable, as these mostly related to the planning, construction, rehabilitation and commissioning phases only. The original EMPr document was designed pre-operation principally to govern these construction phase impacts, and has been superseded during the operational phase by Sasol Business Unit-specific risk assessments; compliance with the EA, and other relevant authorisations; and through Sasol's choice to comply with the ISO 14001 Environmental Management international standard. It is however recommended that the operational phase



measures are updated to clearly reflect the need to management potential impacts along the servitude strip as opposed to the construction strip currently referred to in some instances.

The EIA Regulations 2014 (as amended) requires that the EA and EMPr is audited only at least every five years, and Sasol has systems in place which are considered to be more robust for monitoring compliance and implementing changes than through the EMPr audits; including the annual audit of each business unit to meeting ISO 14001 standards.

New impacts and risks are continually identified and assessed by Sasol by its Governance SHE Risk and Assurance department; which assesses environmental risks and drives improvement implementation. The SHE Environment department facilitates Environmental Risk Assessments per business entity to ensure that gaps are addressed through implementation of mitigation measures via the Integrated Management System. Sasol further addresses all Key Undesirable Events (KUEs) from a group perspective. Risk documentation is hosted on Sasol's Information Management System.

In conclusion, WSP considers that for the duration that Sasol continues to operate each business unit under ISO 14001 standards and meet licence compliance (EA, WUL, AEL), this is effective as mitigation against any gaps in the EMPr and as a means to regularly identify new impacts and risks. In the event that Sasol elects to no longer comply with ISO standards, an alternative system must be implemented. Such an alternative may involve updates to the EMPr and regular (annual) audits against these updates.

# Appendix A

ENVIRONMENTAL AUTHORISATION (REF NO: 12/12/20/1067)





Private Bag X 447· PRETORIA · 0001· Fedsure Building · 315 Pretorius Street · PRETORIA Tel (+ 27 12) 310 3911 · Fax (+ 2712) 322 2682

Reference: 12/12/20/1067 Enquiries: Mr John Geeringh

Telephone: (012) 310 3491 Fax: (012) 320 7539 E-mail: jgeeringh@deat.gov.za

Mr Stanley Bracey Sasol Gas Ltd P O Box 123961 ALRODE 1451

Fax no: 011 522 1913

PER FACSIMILE / MAIL

Dear Mr Bracey

APPLICATION FOR AUTHORISATION: R. 387: SASOL GAS LTD: CONSTRUCTION OF A NATURAL GAS PIPE LINE BETWEEN SECUNDA AND SASOLBURG (REFERENCE NUMBER: 12/12/20/1067).

The environmental impact assessment report (EIAR), dated 22 May 2009 and addendum report dated 9 August 2009, for the abovementioned project, submitted to the Department refers. Please be advised that the Department has accepted the EIAR and has decided to grant authorisation. The environmental authorisation and reasons for the decision are attached herewith. The environmental management plan (EMP) submitted with the EIAR is approved for implementation and the requirements stipulated in the EMP forms part of the conditions of authorisation.

In terms of regulation 10(2) of the Environmental Impact Assessment Regulations, 2006, you are instructed to notify all registered interested and affected parties (IAPs), in writing and within ten (10) calendar days of the date of this letter, of the Department's decision in respect of your application as well as the provisions regarding the making of appeals that are provided for in the regulations.

Your attention is drawn to Chapter 7 of the Regulations which regulates appeal procedures. Attached please find a simplified copy of the appeals procedure to be followed. Kindly include a copy of this procedure with the letter of notification to IAPs.

A copy of the official appeal form can be obtained from:

Mr PKM Retief, Appeals Administrator, Tel: 012 310 3705, <a href="mailto:pretief@deat.gov.za">pretief@deat.gov.za</a>; or

Mr H Grovè, Appeals Administrator, Tel: 012 310 3070, <a href="mailto:pretief@deat.gov.za">pretief@deat.gov.za</a>; at the Department.

Should you wish to appeal any aspect of the decision, you must, *inter alia*, lodge a notice of intention to appeal with the Minister, within 10 days of receiving notice of the decision, by means of one of the following methods:

By facsimile:

(012) 320 7561;

By post:

Private Bag X447, Pretoria, 0001; or

By hand:

2<sup>nd</sup> Floor, Fedsure Form Building, North Tower, cor. Van der Walt and Pretorius

Streets, Pretoria,

Should the Applicant decide to appeal, the Applicant must serve a copy of its notice of intention to appeal on all registered IAPs as well as a notice indicating where, and for what period, the appeal submission will be available for inspection.

Please include the Department, attention of the Director: Environmental Impact Evaluation, in the list of IAPs, notified through your notification letter of the decision, for record purposes.

The authorised activities may not commence within thirty (30) days of the date of signature of the authorisation. Please further note that the Minister may, on receipt of appeals against the authorisation or conditions thereof suspend the authorisation pending the outcome of the appeals procedure.

Yours sincerely

Ms Lize McCourt

Chief Director: Environmental Impact Management

Department of Environmental Affairs
Date: 12 October 2009

CC:

Mr Alfonso Niemand

Nature & Business Alliance

Fax: 086 609 0677

Copy to:

Mr Herman Grove

DEA

# APPEALS PROCEDURE IN TERMS OF CHAPTER 7 OF R. 385 OF 2006 TO BE FOLLOWED BY THE APPLICANT AND INTERESTED AND AFFECTED PARTIES UPON RECEIPT OF NOTIFICATION OF AN ENVIRONMENTAL AUTHORISATION

APPLICANT	INTERESTED AND AFFECTED PARTIES (IAPs)
Receive notice of Environmental Authorisation from the relevant Competent Authority	Receive notice of Environmental Authorisation from Applicant/Consultant
<ol><li>Within 10 days of receipt of notification, notify the relevant Competent Authority and all IAPs of intention to appeal</li></ol>	<ol><li>Within 10 days of receipt of notification, notify the relevant Competent Authority of intention to appeal</li></ol>
Notification served by the Applicant must include:     3.1.A copy of the notice of intention to appeal; and     3.2.A notice indicating where and for what period the appeal submission will be available for inspection by all IAPs	Appellant must serve on the Applicant     3.1. A copy of the notice of intention to appeal     3.2. A notice indicating where and for what period the appeal submission will be available for inspection by the applicant
The appeal must be submitted to the relevant Competent Authority or delegated organ of State within 30 days of lodging of the notice of intention to appeal	<ol> <li>The appeal must be submitted to the relevant Competent Authority or delegated organ of State within 30 days of lodging of the notice of intention to appeal</li> </ol>
5. A person or organ of state that receives notice of an appeal may submit a responding statement to the relevant Competent Authority or delegated organ of state within 30 days from the date that the appeal submission was made available for inspection by the appellant	5. An Applicant that receives notice of an appeal may submit a responding statement to the relevant Competent Authority or delegated organ of State within 30 days from the date the appeal submission was made available for inspection by the appellant

#### NOTES:

#### 1. An appeal against a decision must be lodged with:-

- a) the Minister of Water and Environmental Affairs if the decision was issued by the Director-General of the Department of Environmental Affairs (or another official) acting in his/ her capacity as the delegated Competent Authority;
- b) the MEC if the decision was issued by the Head of Department (or another official) acting in his/ her capacity as the delegated Competent Authority;
- c) the delegated organ of state where relevant.

#### 2. An appeal lodged with:-

- a) the Minister of Water and Environmental Affairs must be submitted to the Department of Environmental Affairs;
- b) the MEC must be submitted to the provincial department responsible for environmental affairs;
- c) the delegated organ of state, where relevant, must be submitted to the delegated organ of state.

#### 3. An appeal must be:-

- a) on an official form obtainable or published by the relevant department;
- b) accompanied by:
- a statement setting out the grounds of appeal;
- supporting documentation which is referred to in the appeal and is not available to the relevant Competent Authority;
- a statement that the appellant has complied with regulation 62 (2) or (3) together with copies of the notices referred to in regulation 62;
- the prescribed appeal fee, if any.

#### 4. A copy of the official appeal form can be obtained from:

See authorisation cover letter.



# **Environmental Authorisation**

Authorisation register number:

12/12/20/1067

Last amended:

Holder of authorisation:

Location of activity:

SASOL GAS LTD

SECUNDA TO SASOLBURG

#### Decision

The Department of Environmental Affairs (DEA) (hereafter referred to as the "Department") is satisfied, on the basis of information available to it and subject to compliance with the conditions of this environmental authorisation, that the applicant should be authorised to undertake the activity specified below.

Details regarding the basis on which the Department reached this decision are set out in Annexure 1.

# **Activities authorised**

By virtue of the powers conferred on it by the National Environmental Management Act, 1998 (Act No. 107 of 1998) and the Environmental Impact Assessment Regulations, 2006 the Department hereby authorises –

Sasol Gas Ltd

with the following contact details -

Mr Stanley Bracey Sasol Gas Ltd P O Box 123961

**ALRODE** 

1451

Tel no: 011 865 8500 Fax no: 011 522 1913

to undertake the following activities (hereafter referred to as the "development") applied for: GN R. 387:

- The construction of facilities or infrastructure, including associated structures or infrastructure, for —
  - (e) any process or activity, which requires a permit or license in terms of legislation governing the generation or release of emissions, pollution, effluent or waste and which is not identified in Government notice no r. 386 of 2006; and
  - (j) the bulk transportation of dangerous goods using pipelines, funiculars or conveyors with a throughput capacity of 50 tons or 50 cubic metres or more per day;



GN R. 386;

- The construction of facilities or infrastructure, including associated structures or infrastructure, for-
  - (m) any purpose within the one and ten year flood line of a river or stream, or within 32 meters from the bank of a river or stream where the flood line is unknown, excluding purposes associated with existing residential use, but including canals, channels, bridges, dams or weirs;
- The dredging, excavation, infilling, removal or moving of soil, sand or rock exceeding 5 cubic meters from a river, tidal lagoon, tidal river, lake, in-stream dam, floodplain or wetland;
- 12.. The transformation or removal of indigenous vegetation of 3 hectares or more, or of any size where the transformation or removal would occur within a critically endangered or an endangered ecosystem listed in terms of Section 52 of the National Environmental Management: Biodiversity Act, 2004 (Act No 10 of 2004); and
- 15. The construction of a road that is wider than 4m or that has a reserve wider than 6m, excluding roads that fall within the ambit of another listed activity or which are access roads of less than 30m long;

for the construction of a new natural gas pipe line, as described in the environmental impact assessment report (EIAR), dated 22 May 2009 and addendum EIAR report dated 9 August 2009, submitted to the Department on 11 August 2009.

The pipe line will be installed between Secunda and Sasolburg within the jurisdiction of the Govan Mbeki, Dipaleseng and Metsimaholo Municipalities, which falls within the Mpumalanga, Gauteng and Free State Provinces, hereafter referred to as "the property", as described in the EIAR dated 22 May 2009.

## Description of the development

The development of the pipe line must take place along the route corridor approximately 400 meters south of the existing gas pipe lines and parallel to the proposed new liquid fuel pipe lines, as shown on the maps included in the EIAR in figure 2.2, page 30 of the EIAR dated 22 May 2009, over the properties listed on page 32 in the EIAR, within a corridor width of 100m



either side of the centre line indicated on the maps outside built up areas (to allow for minor adjustment due to localised constraints), and will consist of the following major components:

- 1. The installation of a new 762mm diameter steel pipe line of approximately 169km.
  - a. The pipe line must be buried at a minimum depth of 1 metre along its entire length with a fibre optic cable for operational management and control as well as cathodic protection to prevent corrosion, installed with the pipe line as detailed in the EIAR in accordance with the provisions of SANS 10089 and other applicable standards as listed in the EIAR on page 19.
  - Leak detection systems must be installed as part of this project to ensure any gas leaks from the pipe line are detected quickly and remedial work is done immediately.
  - c. The final pipe line design route crossings at water bodies must be approved by the Department of Water Affairs (DWA) as part of the Water Use License issued to the holder of this authorisation.
  - d. Where the pipe line crosses agricultural land used for crop production, the pipe line must be buried deep enough to allow for agricultural activities and crop production to continue after construction is completed to minimise the impact on food production as food security is a very high priority for the country.
  - e. The final pipe line design route must be inspected by a registered heritage specialist to determine the requirements for permits in relation to destruction of such sites and the specific management / protection measures required for such sites prior to construction commencing on such sites.
  - f. The final pipe line design route must be subjected to a Major Hazard Installation (MHI) risk assessment and the emergency response plans of the affected local authorities must be updated to accommodate the new pipe line in their respective emergency response plans before operation commences.
  - g. The construction servitude will be a maximum of 30m wide where space is available but less where confined due to other existing infrastructure.
- Establishment of associated construction camps, lay down areas for pipe sections prior to assembly and installation.
- Establishment of an access road for construction along the servitude.
- 4. The final pipe line position must be marked with markers at regular intervals and at points where the pipe line change direction, as well as distance markers and markers visible from the air for aerial inspection by helicopter during the operational phase.

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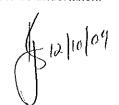
- 5. Construction of a pressure reducing station at Sasol Chemical Industries (SCI) and pigging stations along the route each with associated buildings, pumps, electrical infrastructure, fire protection and water management structures within the perimeter security fence of the station at the approximate locations as shown on the map included in Figure 2.2 on page 30 of the EIAR dated 22 May 2009.
- 6. Rehabilitation works upon completion of construction to restore the environment to its natural condition prior to construction.

The granting of this environmental authorisation is subject to the conditions set out below.

### **Conditions**

#### Scope of authorisation

- 1.1 Authorisation of the development is subject to the conditions contained in this authorisation, which conditions form part of the environmental authorisation and are binding on the holder of the authorisation.
- 1.2 The holder of this authorisation shall be responsible for ensuring compliance with the conditions of this authorisation by any person acting on his or her behalf, including but not limited to, an agent, sub-contractor, employee or person rendering a service to the holder of the authorisation.
- 1.3 The authorised development may only be carried out at the property indicated above and as described in the EIAR dated 22 May 2009, and as shown on the map set included in the EIAR.
- 1.4 Any substantial changes to the project description set out in the EIAR, and authorised under this authorisation must be approved, in writing, by the Department before such changes may be effected. In assessing whether to grant such approval or not, the Department may request such information as it deems necessary to evaluate the significance and impacts of such changes and it may be necessary for the holder of the authorisation to apply for further authorisation in terms of the regulations.
- 1.5 This development must commence within a period of five (5) years from the date of issue of this authorisation. If commencement of the development does not occur within that period, the authorisation lapses and a new application for environmental authorisation must be made in order for the development to be undertaken.



- 1.6 This authorisation does not negate the holder of the authorisation's responsibility to comply with any other statutory requirements that may be applicable to the development and associated infrastructure.
  - 1.6.1 Relevant legislation that must be complied with by the holder of this authorisation include but is not limited to:
    - Compliance with the requirements of Section 38 of the National Heritage Resources Act, Act 25 of 1999, including any comments and recommendations of the relevant heritage resources authority responsible for the area in which the development is proposed.
    - Provisions of the Occupational Health and Safety Act, Act 85 of 1993.
    - Provisions of the Environment Conservation Act, Act 73 of 1989.
    - Provisions of the NEM: Air Quality Management Act, Act 39 of 2004.
    - Provisions of the NEM: Waste Management Act, Act 59 of 2008.
    - Provisions of the Conservation of Agricultural Resources Act, Act 43 of 1983.
    - Provisions of the National Forests Act, Act 84 of 1998.
    - Provisions of the National Water Act, Act 36 of 1998.
    - Provisions of the Hazardous Substances Act, Act 15 of 1973.
    - Provisions of the National Key Points Act, Act 102 of 1980.
    - Provisions of the Petroleum Pipelines Act, Act 60 of 2003.
    - Provisions of the Explosives Act, Act 26 of 1956.
    - Provisions of the Fencing Act, Act 31 of 1963.
    - Relevant local authority bylaws and regulations.
    - Should any activity be planned on site that is a listed activity in terms of the NEMA Regulations, 2006, which is not covered by this authorisation, a separate application for such activity must be lodged with the relevant competent authority.

#### Appeal of authorisation

1.7 The holder of the authorisation must notify every registered interested and affected party (IAP), in writing and within 10 (TEN) calendar days, of receiving notice of the Department's decision to authorise the development.



- 1.8 The notification referred to in 1.7 must
  - 1.8.1 Specify the date on which the authorisation was issued;
  - 1.8.2 Inform the interested and affected party of the appeal procedure provided for in Chapter 7 of the regulations;
  - 1.8.3 Advise the interested and affected party that a copy of the authorisation will be furnished on request, and
  - 1.8.4 Give the reasons for the decision.

#### 1.9 Management during the construction phase:

- 1.9.1 The environmental management plan (EMP) for the construction phase included in the EIAR dated 22 May 2009, section 13 on page 117, and submitted to the Department, is hereby approved for implementation. The mitigation measures proposed in the EIAR dated 22 May 2009, and requirements stipulated in the EMP as included in the EIAR, for environmental management during the construction phase forms part of the conditions of this environmental authorisation and must be implemented by the holder of this authorisation.
- 1.9.2 The holder of this authorisation must ensure the following measures are implemented during the construction phases of the pipe line development:
  - 1.9.2.1 All contractor staff must undergo environmental awareness induction training with regard to protection of the natural environment, the conditions of the environmental authorisation, the requirements of the EMP and the respect of the rights of landowners on whose properties construction takes place.
  - 1.9.2.2 All contractor staff must be easily identifiable through the use of company overalls with company logos and all contractor staff must have an identity card to ensure unwanted elements can be identified to ensure security of the surrounding communities and landowners.
  - 1.9.2.3 Measures for waste avoidance and minimisation at all works areas, lay down areas and construction camps and disposal of construction waste at an appropriately registered facility.
  - 1.9.2.4 Measures for dust control during the construction phase.

- 1.9.2.5 Measures for noise control during the construction period where construction activities occur close to residences or built-up areas to limit the nuisance factor of noise.
- 1.9.2.6 Measures to ensure public access to any homesteads or amenities must at all times be guaranteed and shall not be restricted due to this development. Where use is made of private access roads to gain access to the construction site, use of such roads must be negotiated with the affected landowners and speed limits on such roads must be enforced on all construction vehicles. All access roads used by the contractors must be reinstated to their original condition if any damage is caused to such roads.
- 1.9.2.7 Archaeological remains, features and structures older than 60 years are protected by the National Heritage Resources Act, 1999 (Act No. 25 of 1999). Should any archaeological or palaeontological artefacts be exposed during excavation for the purpose of laying the pipe lines, construction in the vicinity of the finding must be stopped. A heritage specialist must be called to the site for inspection. Under no circumstances shall any artefacts be destroyed or removed from the site. The South African Heritage Resource Agency must be informed of any new finds.
- 1.9.3 The approved construction EMP will be seen as a dynamic document. Should the construction activities exceed any predicted impact levels, the EMP must be amended to include any additional requirements. However, any proposed amendment of the EMP must be submitted to the Department for approval in writing.
- 1.9.4 Amendment of the EMP must be approved in writing by the Department before such changes can be implemented.

#### Servitude works area and pipe lay down areas

1.9.5 This development is authorised on condition that Sasol Gas acquires the necessary servitude rights for the pipe line route. Sasol Gas must negotiate with affected landowners within the authorised corridor alignment prior to the start of construction activities. Proof of such negotiations must be made available to the Department on request should any dispute arise.



- 1.9.6 In addition, any route adjustment, due to the specific local circumstances, which deviates outside the authorised corridor alignment of 200m, must be assessed and submitted to the Department for authorisation in writing before implementation. Approval of such deviations outside the authorised corridor must be authorised in writing by the Department before such deviations may be implemented.
- 1.9.7 All construction works are limited to the servitude area negotiated with the landowners. The works areas must be properly demarcated.
- 1.9.8 No construction workers shall be allowed to reside on any site unless a written agreement with the affected landowner is obtained.
- 1.9.9 All work areas must be supplied with proper sanitation facilities. Portable toilets (at least one for every twenty workers) must be deployed along the works areas and workers must use these facilities at all times. No use of the veld is allowed for sanitation purposes. Workers transgressing this condition must be fined or removed from site.
- 1.9.10 All works areas must have waste bins for general waste and such bins must be serviced regularly. All bins must be supplied with lids to ensure littering is prevented. Bins must be secured to prevent wild animals from spreading litter from such bins. Workers littering the site must be fined or removed from site.
- 1.9.11 No open fires are allowed on site for heating or cooking purposes. The Applicant must ensure that the contractor have fire fighting equipment available at all work sites in the event of accidental fires, especially during welding of the pipe line sections. Fire fighting equipment must be tested regularly for operation and workers must be trained in the use of such equipment. The Applicant will be responsible for all claims emanating from run-away fires caused by the construction work teams.
- 1.9.12 All pipe lay down areas outside the negotiated servitude area must be negotiated with the affected landowner and written agreement must be obtained. Proof of such negotiations and agreements must be made available to the Department on request should any dispute arise.
- 1.9.13 Servitude vegetation clearing must be done in accordance with the recommendations of the EIAR and a search and rescue operation of protected species must be done where the plants can be transplanted safely and with a reasonable success rate.



- 1.9.14 Topsoil and spoil must be stored separately and topsoil must be stored in such a way as to ensure maximum protection of the quality of the topsoil to ensure the seed bank stays viable for rehabilitation.
- 1.9.15 No protected species of vegetation may be destroyed without the required permit from the relevant competent authority.
- 1.9.16 Where possible, large specimens of indigenous species within the construction servitude must be preserved if they will not interfere with or pose a danger to the future operation of the pipe line or cause a major obstacle during construction works.

#### Construction camps

- 1.9.17 Construction camps must be sited taking into consideration the local community security concerns.
- 1.9.18 No construction camp site on privately owned land may be established without written approval from the affected landowner.
- 1.9.19 No labour recruitment may be done at construction camps. Recruitment offices for labour may be set up in towns in proximity to the works areas to allow local labour to apply for work.
- 1.9.20 The holder of this authorisation must have a specific management plan for management of the day to day operation of each construction camp site, including measures for waste management, sanitation and water management.
- 1.9.21 Construction camps must be inspected weekly by the environmental control officer (ECO) for compliance with the management plan for camp sites.
- 1.9.22 Construction camp sites must be kept neat and the visual impact of camp sites must be mitigated to acceptable levels through screening.
- 1.9.23 No water may be abstracted from or effluent or waste water released into natural sources without the required permits from the DWA and Sasol Gas must have written agreements with landowners for use of any water from private boreholes or dams.



#### Workshop areas at construction camps

- 1.9.24 Workshop areas for vehicle servicing must have a concrete floor area for servicing of vehicles.
- 1.9.25 All hydrocarbon containing fuels and lubricants must be stored inside a bunded area which can accommodate 110 percent of the stored liquids.
- 1.9.26 All spills of hydrocarbon materials shall be contained and cleaned up immediately and polluted soils shall be disposed of in a registered waste site. Minor spills can be treated on site.
- 1.9.27 Should it be necessary to service any vehicles or equipment in the servitude construction area due to a breakdown, a drip tray shall be used to prevent carbon spills onto the soil.
- 1.9.28 All hydrocarbon waste material generated at the workshop shall be contained in proper storage drums for recycling or disposal at a registered waste site.

#### Pressure reducing station and pigging stations

- 1.9.29 Noise abatement measures must be installed at all stations to reduce the impact of noise associated with the operational phase, especially in stations in close proximity to residential areas or homesteads.
- 1.9.30 Security lighting installed at stations must be designed in such a way that light spill to the surrounding areas is minimised, especially where stations are constructed in rural areas with a high visual quality and where light spill may cause a significant aesthetical impact.
- 1.9.31 Landscaping and architectural design of station structures must be done to ensure that the station blend in with the surrounding area to minimise the visual impact of the station.
- 1.9.32 Stations must be fitted with the required ablution facilities for use by any on site security or operational and maintenance personnel.

#### Wetland, river and stream crossings

1.9.33 Construction at wetland, river and stream crossings shall be done in accordance with detailed design drawings for each specific crossing point.



- 1.9.34 Where crossings are required, the approval of the DWA of the engineering design shall be obtained in writing before any construction commence on such sites.
- 1.9.35 All perennial river and stream crossings must be done through directional drilling unless otherwise authorised by the DWA. Any crossing by means other than directional drilling must take into consideration the scour effect of the water on the river or stream bottom over time to ensure that the pipe line will be installed deep enough to remain stable for the lifespan of the pipe line.
- 1.9.36 Special care shall be taken when doing any construction work in wetland areas and the area of disturbance shall be kept to the absolute minimum. Sheet flow in wetland areas must not be prevented and the necessary measures to ensure continued sheet flow must be implemented during design of wetland crossings.
- 1.9.37 All wetland areas, river and stream crossings disturbed during construction must be rehabilitated and inspected by DWA upon completion. Once construction at river, stream or wetland crossings are completed, the relevant DWA official must sign a release form indicating that rehabilitation was done satisfactorily at each crossing point. The release forms must be made available to the Department on request should any dispute arise.
- 1.9.38 Vegetation at river and stream bank crossings may be cut and treated with a suitable registered herbicide to prevent further growth and root development. Under no circumstances will de-stumping of trees on river and stream banks be allowed as this may lead to unacceptable erosion except where DWA approves an open trench design to cross a river or stream.
- 1.9.39 River and stream banks must be protected against possible erosion by carefully controlling access and construction activities in such areas.
- 1.9.40 Measures to ensure prevention of pollution or siltation of wetlands or rivers and streams during the construction phase must be implemented by the holder of this authorisation.

#### Rehabilitation of works areas, lay down areas and construction camps

1.9.41 All areas disturbed during the construction phase of the project excluding those areas where permanent structures are erected must be rehabilitated



fully in accordance with the recommendations of the specialist ecologist and to the satisfaction of the landowner.

- 1.9.42 All works areas must be fully rehabilitated and construction rubble such as overburden and rock excavated during the excavation of the trench must be disposed of or landscaped in such a manner that the servitude area blends in with the surrounding environment. No heaps of overburden may be left on site.
- 1.9.43 Once construction is completed, all landowners must sign a release form with the ECO indicating that rehabilitation was done satisfactorily and that all outstanding issues or claims have been settled by Petroline. The release forms must be made available to the Department on request should any dispute arise.

#### Service infrastructure

- 1.9.44 Disruption of service infrastructure must be kept to an absolute minimum. Should it be necessary to disrupt any services during the construction phase, the affected parties must be informed at least two (2) weeks in advance.
- 1.9.45 Should any accidental damage to service infrastructure take place during construction activities, Sasol Gas must take immediate action to restore such disrupted service in the shortest time possible.
- 1.9.46 Any claims for damage to service infrastructure by landowners due to construction activities must be addressed within 30 days from such claim being submitted.
- 1.9.47 Road crossings of the pipe line must be done in accordance with a provincial roads department or South African National Roads Agency Limited (SANRAL) approved design drawing and directional drilling must be implemented at all national, provincial and district road crossings as a minimum to ensure no disruption of traffic.
- 1.9.48 The use of existing roads to gain access to the servitude works area is preferred; however use of any private access roads must be agreed with the landowners in writing. All private roads not to be used for the purpose of construction must be marked clearly with no entry signs.
- 1.9.49 Sasol Gas must ensure that contractors adhere to an agreed speed limit on private roads to prevent accidents and road damage.



- 1.9.50 Upon completion of construction all private roads must be rehabilitated to their original condition and to the satisfaction of the landowner.
- 1.9.51 Rail crossings and power line crossings must be planned in conjunction with Transnet and Eskom and the necessary approvals from these parastatal companies must be obtained prior to construction at such crossings.
- 1.9.52 No fences may be flattened for the purpose of construction without the consent from the landowner. All fence crossings shall be fitted with a proper servitude gate before construction commences to ensure access for the construction teams.
- 1.9.53 Where required deviations of fences may be done with the written consent of the landowner to allow for construction activities.
- 1.9.54 Upon completion of construction all damage to fencing shall be properly fixed to the satisfaction of the landowners.

#### 1.10 Management during the operational phase.

- 1.10.1 Before commencement of operation the following requirements for the operational phase must be complied with by Sasol Gas:
  - 1.10.1.1 A major hazard installation (MHI) risk assessment must be completed and approved by the relevant competent authority.
  - 1.10.1.2 Sasol Gas must ensure that all local authorities are aware of the commencement of operation and that the necessary emergency response plans for catastrophic events are in place and approved where required.
- 1.10.2 The operational environmental management of the pipe lines servitude must be included in the Sasol Gas environmental management system (EMS) for pipe line servitudes.

#### 1.11 Monitoring of the construction activities

#### 1.11.1 Monitoring of the activity during construction

1.11.1.1 The holder of this authorisation must appoint a suitably qualified and responsible person that will act as an environmental control officer (ECO) for the construction period that will have the responsibility of



implementing the requirements of the approved construction EMP as well as the conditions of this authorisation.

- 1.11.1.2 The ECO must be appointed before the start of construction and the Department must be notified of the details and contact numbers of the appointee in writing for record and communication purposes.
- 1.11.1.3 The ECO must compile and present the environmental awareness induction training referred to in 1.9.2.1 above.
- 1.11.1.4 The ECO must inform all affected landowners of the commencement of construction works on their properties at least one week prior to works commencing on their properties.
- 1.11.1.5 The ECO must ensure that all landowners are informed of the ECO contact details and must strive to keep landowners informed regarding construction progress.
- 1.11.1.6 The ECO must monitor the construction works on a full time basis to ensure the holder of this authorisation complies with the conditions of this authorisation. Records relating to compliance monitoring must be kept on site and made available for inspection to any relevant and competent authority in respect of this development.
- 1.11.1.7 The ECO must submit a quarterly compliance report, in writing, to The Director: Environmental Impact Evaluation and copy the holder of this authorisation with such report. This report shall include a description of all activities on site, problems identified, transgressions noted and remedial action implemented. The report must reflect the DEA reference number of the project on the cover page.
- 1.11.1.8 The ECO must report any significant environmental incident or non-conformance by the holder of this authorisation or any contractor to the Department, attention of the Director: Environmental Impact Evaluation, within 48 hours of such incident or non-conformance and copy the holder of this authorisation with such a report.
- 1.11.1.9 The ECO must maintain the following on site:
  - 1.11.1.9.1 A site diary.
  - 1.11.1.9.2 Copies of all reports submitted to the Department.
  - 1.11.1.9.3 A complaints register of all public complaints and the remedies applied to such complaints.



- 1.11.1.10 The ECO must compile a report on all rehabilitation measures implemented for future monitoring and measurement of success of the rehabilitation measures during the operational phase of the development.
- 1.11.1.11 The ECO must remain employed until all rehabilitation measures as well as site clean-up are completed, the release forms were signed by the landowners and the DWA and the site is handed over to the holder of the authorisation for operation.

#### 1.11.2 Monitoring of the activity during operation

- 1.11.2.1 The holder of this authorisation must monitor the operational phase of the development once operation commence as part of the Sasol Gas EMS. The operational phase commence when gas is pumped for the first time.
- 1.11.2.2 Should the responsibility for compliance with this authorisation be transferred to any other juristic person, the transfer of the environmental authorisation from the initial holder of the authorisation to any other juristic person must be formally recorded in writing and a copy of the transfer document indicating the contact details of the juristic person must be submitted to the Director: Environmental Impact Evaluation for record purposes. The transfer document must clearly indicate the DEA reference number.

#### Reporting to the Department

- 1.12 The holder of the authorisation must submit an environmental compliance audit report to the Department: Attention of the Director: Environmental Impact Evaluation, upon completion of the construction activities as planned for the establishment of the individual pipe lines and associated infrastructure. This report must be submitted after completion of each phase of pipe line construction.
  - 1.12.1 The environmental audit report must indicate the date of the audit, the name of the auditor, the DEA project reference number and the outcome of the audit in terms of compliance with the Environmental Authorisation conditions as well as the requirements of the EMP.



1.12.2 The ECO may compile this report or the holder of this authorisation may appoint an external auditor to compile the report.

#### 1.13 Commencement

- 1.13.1 The authorised activities may not commence within thirty (30) days of date of signature of this authorisation. Commencement includes site establishment.
- 1.13.2 Should you be notified by the Minister of a suspension of the authorisation pending any appeals decision on the authorised activities, you may not commence with the activities unless authorised by the Minister in writing.

#### 1.14 Notification to authorities

- 1.14.1 Thirty (30) days written notice must be given to the Department that construction of the pipe line will commence. Commencement for the purposes of this condition includes site preparation. The notice must include a date on which it is anticipated that the construction activity will commence.
- 1.14.2 Thirty (30) days written notice must be given to the Department that the operational phase of the pipe line will commence.

#### Site closure and decommissioning

1.15 Should the pipe line ever become redundant and have to be decommissioned, the holder of the authorisation at the time of decommissioning shall undertake the required actions as prescribed by legislation at the time and comply with all relevant legal requirements administered by any relevant and competent authority at that time for the decommissioning phase.

#### General

1.16 A copy of this authorisation must be kept at the site office where the development will be undertaken. The authorisation must be produced to any authorised official of the Department who requests to see it and must be made available for inspection by any employee or agent of the holder of the authorisation who works or undertakes work at the property.



- 1.17 Where any of the contact details of the holder of this authorisation change, including the name of the responsible person, the physical or postal address and / or telephonic details, the holder of the authorisation must notify the Department as soon as the new details become known.
- 1.18 Upon transfer of the management function of the development the future holder of the authorisation must take ownership of the implementation of the conditions of this environmental authorisation.
- 1.19 The holder of the authorisation must notify the Department, in writing and within 48 (fourty eight) hours, if any condition of this authorisation cannot be or is not adhered to. Any notification in terms of this condition must be accompanied by reasons for the non-compliance. Non-compliance with a condition of this authorisation may result in criminal prosecution or other actions provided for in the National Environmental Management Act, 1998 and the regulations.
- 1.20 National government, provincial government, local authorities or committees appointed in terms of the conditions of this authorisation or any other public authority shall not be held responsible for any damages or losses suffered by the holder of the authorisation or his successor in title in any instance where construction or operation subsequent to construction be temporarily or permanently stopped for reasons of non-compliance by the holder of the authorisation with the conditions of authorisation as set out in this document or any other subsequent document emanating from these conditions of authorisation.

Date of environmental authorisation: 12 October 2004

Ms Lize McCourt

Chief Director: Environmental Impact Management

**Department of Environmental Affairs** 

Date:

#### **Annexure 1: Reasons for Decision**

#### 1. Background

The applicant, Sasol Gas Ltd, applied for authorisation to undertake the following activities:

#### GN R. 387:

- 1. The construction of facilities or infrastructure, including associated structures or infrastructure, for -
  - (e) any process or activity, which requires a permit or license in terms of legislation governing the generation or release of emissions, pollution, effluent or waste and which is not identified in Government notice no r. 386 of 2006; and
  - (j) the bulk transportation of dangerous goods using pipelines, funiculars or conveyors with a throughput capacity of 50 tons or 50 cubic metres or more per day;

#### GN R. 386:

- 1. The construction of facilities or infrastructure, including associated structures or infrastructure, for-
  - (m) any purpose within the one and ten year flood line of a river or stream, or within 32 meters from the bank of a river or stream where the flood line is unknown, excluding purposes associated with existing residential use, but including canals, channels, bridges, dams or weirs;
- 4. The dredging, excavation, infilling, removal or moving of soil, sand or rock exceeding 5 cubic meters from a river, tidal lagoon, tidal river, lake, in-stream dam, floodplain or wetland;
- 12. The transformation or removal of indigenous vegetation of 3 hectares or more, or of any size where the transformation or removal would occur within a critically endangered or an endangered ecosystem listed in terms of Section 52 of the National Environmental Management: Biodiversity Act, 2004 (Act No 10 of 2004); and
- 15. The construction of a road that is wider than 4m or that has a reserve wider than 6m, excluding roads that fall within the ambit of another listed activity or which are access roads of less than 30m long; 12/10/09

for the construction of a new natural gas pipe line, as described in the environmental impact assessment report (EIAR), dated 22 May 2009 and addendum EIAR report dated 9 August 2009, submitted to the Department on 11 August 2009.

In terms of NEMA, section 24 C (2) and regulation GN R. 385: 3 the national department becomes the competent authority to issue an environmental authorisation, as the activity will take place over a provincial boundary.

The applicant appointed Nature & Business Alliance (Pty) Ltd (NBA) to undertake a scoping / EIA process and to compile an EIAR as required by regulation GN R. 385: 27. NBA appointed various specialists whom compiled specialist studies and assessed the various potential impacts identified. Mitigation measures to mitigate potential impacts were identified and included in the EIAR.

#### 2. Information considered in making the decision

In reaching its decision, the Department took, inter alia, the following into consideration -

- a) The information contained in the revised SR and POSEIA dated 12 May 2008 as accepted by the Department;
- b) The comments and responses document included in the EIAR in Volume 3 of the EIAR which includes comments from interested and affected parties (IAPs);
- c) The information contained in the final EIAR, dated 22 May 2009 and addendum report dated 9 August 2009, submitted to the Department on 11 August 2009;
- The information contained in the specialist studies as included in the EIAR dated 22 May 2009, Volume 2;
- e) Comments received from the provincial department of Gauteng on the final EIAR;
- f) Comments received from the Directorate: Biodiversity and Heritage;
- g) Minutes of meetings held between the consultants and the IAPs in all affected provinces;
- h) Route maps as included in the final EIAR;
- A site visit by helicopter on the proposed final pipe line route on 28 August 2009 attended by Mr Geeringh of the Department; and



(n) The objectives and requirements of relevant legislation, policies and guidelines, including section 2 of the National Environmental Management Act, 1998 (Act No. 107 of 1998).

#### 3. Key factors considered in making the decision

All information presented to the Department was taken into account in the Department's decision on the EIAR and EMP. Factors considered in making the decision are the following:

- The need and desirability for the construction of the proposed new pipe line is clearly understood. The demand for gas supply will soon outstrip the supply capacity of the existing pipe lines.
- The potential impacts of the construction, operational and decommissioning of the proposed pipe line is assessed in detail and no fatal flaws were identified on the proposed route of the pipe line and the positions of the pressure reducing station and pigging stations.
- Feasible and reasonable alternative options including the no-go option were investigated as part of the assessment process.
- A sufficient public participation process was undertaken and the consultant has satisfied the minimum requirements as prescribed in the EIA regulations, 2006 for public involvement.
- The consultant appointed various specialists to assist with the assessment of potential impacts and the specialists have recommended feasible and implement able mitigation measures to minimise potential impacts.
- No significant environmental degradation will result directly from the activities applied for and authorised in this authorisation if the approved EMP and proposed mitigation measures in the EIAR which form part of this authorisation is implemented.
- The applicant has the ability to implement the conditions of this authorisation and the requirements of the EMP.
- The requirements of the Regulations, 2006, have been complied with in respect of this application for authorisation for construction of the proposed pipe lines.

A summary of the potential impacts identified which, in the Department's view, were of the most significance is set out below. 12/10/09

#### Pressure reducing station and pigging stations:

- a) The potential impacts on air quality, noise pollution and waste management.
- b) The potential impacts on land use.
- c) The potential impacts on heritage resources.
- d) The potential impacts on wetlands and biodiversity.

#### Pipe line:

- a) The potential impacts on safety, health and security of the people in the vicinity of the pipe line.
- b) The potential impacts on air quality, noise pollution and waste management.
- c) The potential social impacts associated with the relocation of people.
- d) The potential impacts on land use and farming operations.
- e) Potential impact on property values.
- f) The potential impacts on heritage resources.
- g) The potential impacts on wetlands, rivers and biodiversity.
- h) Potential erosion impacts.
- i) The technical constraints to the placement of a pipe line.
- j) The potential impacts on water resources due to wetland, river and stream crossings.
- k) The future development of surrounding land and land use.

All impacts identified were assessed in detail and mitigation measures were proposed to mitigate those impacts that could not be avoided in total to acceptable levels. The implementation of the mitigation measures as part of the EMP is crucial to ensure that the project execution will have the minimum impact of the environment. The mitigation measures have been included in the draft EMP submitted with the EIAR dated 22 May 2009 are feasible and can be implemented. No fatal flaws were identified by any specialist in relation to the proposed final route alignment of the pipe line or the positions of the pressure reducing station and pigging stations. Re-routing of the pipe line route was done regularly throughout the study as information became available to ensure that areas where significant impacts were identified are bypassed.

#### 4. Findings

After consideration of the information and factors listed above, the department made the following findings -

- The proposed development is required to address the fuel supply needs of South Africa, especially the inland regions of the Free State, Gauteng, Mpumalanga and North West into the future. The need for the proposed development is clearly demonstrated and justified.
- The natural gas pipe line would have a positive impact on securing fuel supply to central South Africa.
- A detailed public participation process was undertaken and the consultant has satisfied the minimum requirements as prescribed in the EIA Regulations, 2006 for public involvement.
- The procedure followed for the EIA process has been adequate and compliant to the requirements of the Regulations, 2006.
- The information contained in the EIAR and addendum report is deemed accurate and credible.
- The assessment of impacts is detailed and has indicated no fatal flaws with regard to the final proposed route, pressure reducing station and pigging stations.
- There area proposed for the development is already somewhat disturbed due to existing infrastructure, servitudes or agricultural activities and the proposed mitigation measures will ensure that the potential impact of the proposed pipe line is minimised.
- The proposed development is compatible with the proposed site for the development, especially in the light of existing infrastructure and new planned fuel pipe lines in very close proximity to the proposed pipe line route.
- Legal and procedural requirements have been met.
- Comments raised by IAPs are included in the EIAR in a comments and response addendum and the consultant has responded on issues and comments.
- A draft EMP that complies with the requirements of the Regulations, 2006: 34 was included in the EIAR submitted to the Department for approval.
- The Applicant is capable of implementing the proposed conditions of the environmental authorisation and proposed mitigation measures.
- The principles of NEMA can largely be upheld.

In view of the above, the Department is satisfied that, subject to compliance with the conditions contained in the environmental authorisation, the proposed activity will not conflict with the general objectives of integrated environmental management laid down in Chapter 5 of the National Environmental Management Act, 1998 and that any potentially detrimental environmental impacts resulting from the proposed activity can be mitigated to acceptable levels. The application is accordingly authorised.



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