



Our reference: SO-ENV-1325

29 November 2024

Your Ref: EA nr EM1/1(c) /00/17

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Attention: Deputy Director: Environmental Impact Assessment

ENVIRONMENTAL AUTHORISATION EXTERNAL REPORT SUBMISSION

Environmental Authorisations of Sasol South Africa Limited, Sasolburg Operations was externally audited during July 2024. The external audits were conducted to comply to the requirement contained in Chapter 5 part 3 of the Environmental Impact Assessment Regulations.

Sub regulation 34 (6) of the regulations also requires the holder of the environmental authorisation to notify all potential and registered interested and affected parties of the submission of the report and make the report available on request to anyone and on a publicly accessible website, where available.

The external audit reports will be available on <https://www.sasol.com/esg/environmental-audit-reports>.

Sasolburg Operations appointed WSP to conduct the external audits on all Environmental Authorisations and accompanying Environmental Management Programs.

Attached, please find the compliance audit report for the Catalyst production increase at section 4200 [EM1/1(c) /00/17] dated October 2024.

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The Audit report noted sufficient mitigation of environmental impacts and level of compliance to the Environmental Authorisation and Environmental Management Program (EMPr) therefore no recommendations for improvement were made.

Further, in alignment with Chapter 5 Part 4 of the regulation, regulation 36 allows amendment to the impact management action of an EMPr to be affected immediately by the holder of the environmental authorisation and reflect it in the next environmental audit report. Annexure B contains the mitigation measures identified during the environmental impact assessment, for the operational phase of the project, defining the impact management outcome and impact management actions to enable compliance to this regulation.

No impact management outcome or impact management action requires amendment for the Catalyst production increase at section 4200.

Yours faithfully,

Signed by: Johann Van Wyk
Signed at: 2024-11-29 12:37:28 +02:00
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Annexure A

Audit report.

Catalyst Production Increase section 4200



Sasol South Africa Ltd

CATALYST PRODUCTION INCREASE - 4200 (REF. NO: EM1/1 (C)/00/17) AND ENVIRONMENTAL MANAGEMENT PROGRAMME AUDIT

Compliance Audit Report: November 2018 – July
2024





Sasol South Africa Ltd

CATALYST PRODUCTION INCREASE - 4200 (REF. NO: EM1/1 (C)/00/17) AND ENVIRONMENTAL MANAGEMENT PROGRAMME AUDIT

Compliance Audit Report: November 2018 – July 2024

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Sasol South Africa Ltd

CATALYST PRODUCTION INCREASE - 4200 (REF. NO: EM1/1 (C)/00/17) AND ENVIRONMENTAL MANAGEMENT PROGRAMME AUDIT

Compliance Audit Report: November 2018 – July 2024

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AUDITOR CVS

1 INTRODUCTION

1.1 TERMS OF REFERENCE

WSP Group Africa (Pty) Ltd (WSP), as an independent environmental consultant, was appointed by Sasol Operations, a division of Sasol South Africa Limited, to undertake an external environmental compliance audit of the commitments contained in the Amended Environmental Authorisation (EA) (reference number: EM1/1C/00/17) for the Catalyst Production Increase (CPI) at Section 4200 and the Environmental Management Programme (EMPr), and to compile an audit report according to the requirements of the National Environmental Management Act (No. 107 of 1998), as amended (NEMA).

The details of the EA (previously referred to as Record of Decision (RoD), the amendment of the EA and the EMPr, applicable to the current audit, are provided below:

- RoD for the CPI Unit in Sasolburg (reference number: EM1/1C/00/17), dated 22 February 2002 by the Department of Tourism, Environmental and Economic Affairs now the Department of Economic, Small Business Development, Tourism and Environmental Affairs (DESTEA).
- The amendment of the EA on the CPI (on the Sasol One site) in Sasolburg (reference number: EM1/1C/00/17), dated 28 November 2017 by the DESTEA. The amendments include:
 - Brief description of activity
 - Location
 - Applicant details
- The amendment of the EA on the CPI (on the Sasol One site) in Sasolburg (reference number: EM1/1C/00/17), dated 12 February 2018 by the DESTEA. The amendments include:
 - Brief description of activity
 - Location
 - Applicant details
- The amendment of the EA on the CPI (on the Sasol One site) in Sasolburg (reference number: EM1/1C/00/17), dated 22 October 2019 by the DESTEA. The amendments include:
 - Applicant

1.2 SASOL SASOLBURG – CATALYST PRODUCTION INCREASE (SECTION 4200)

This project is situated at Section 4200, Catalyst Preparation Plant, at the Sasol One site, Sasolburg.

Section 4200 has two distinct types of catalysts produced for the Arge and SSBP reactors. Due to shared equipment limitations up to the impregnation stage, these catalysts cannot be manufactured concurrently. The addition of activated carbon is specific to the Arge catalyst, while the SSBP catalyst is incompatible with carbon. This is to avoid contamination between the two processes, thorough system cleaning is required, which is time-consuming and leads to product loss.

To facilitate simultaneous catalyst production, modifications were made to the plant. This increased catalyst production at Section 4200, SCI, by 30%.

This enhancement ensured that the filter presses are adequately filled with precipitated slurry, resulting in a high-quality filter cake suitable for the impregnation step. Additionally, the wash water system was duplicated to enable each filter to operate independently.

1.3 PROJECT TEAM

WSP auditors, Matilda Mbazo and Yvette Mmanasoe, completed a site inspection of the CPI unit against the EA conditions (reference: EM1/1C/00/17) at the Sasol One Facility on **16 July 2024**.

Quality assurance is a critically important part of WSP's consulting services which aim to ensure both delivery of high-quality work and provide legal and commercial protection to the company. Quality assurance of this audit report was undertaken by Anri Scheepers.

The project team is summarised in **Table 1-1** and Curricula Vitae are included as **Appendix A**.

Table 1-1 - Details of the Audit Team

Audit Team	Role	Experience
Anri Scheepers	Review	BA (Hons) Geography
		15 Years' Experience
		Anri graduated from the University of Johannesburg with a BA honours in Geography in 2007 and has 15 years' work experience. Anri is qualified as a Lead Auditor and has undertaken legal compliance auditing, including environmental authorisations, waste management licences, water use licences and EMPs. In addition, she has undertaken general site assessments to determine compliance against local, provincial, and national environmental legislation
Matilda Mbazo	Auditor	BSc (Hons) Geography
		2 years' Experience
		Matilda graduated from the University of Wits with a BSc honours in Geography in 2023 and is currently completing her master's in environmental science. She has 1 year experience in environmental management and currently provides technical and strategic input on a diverse range project in environmental management and environmental compliance audits.
Yvette Mmanasoe	Auditor	BSc Environmental Geography
		Yvette has 8 years' experience in environmental audits in different mining companies, compilation of ESIAs, application EAs, water use licenses, Section 24 G, Mining Rights and Prospecting Rights.

2 AUDIT SCOPE

WSP was appointed by Sasol to conduct the environmental compliance audit for the CPI unit at the Sasol One site, Sasolburg. This report provides an overview of the level of compliance with the conditions contained in the EA, EA amendment and EMPr, as indicated in **Section 1.1**.

The objective of the audit was to:

- Assess the level of compliance with the commitments of the EA and changes in the EA amendment for the CPI Unit.
- Assess the level of compliance with the commitments of the EMPr that was submitted as part of the Scoping Report for the application for environmental authorisation, as agreed and approved by DESTEA;
- Assess the extent to which the avoidance, management and mitigation measures provided for in the EMPr for the operation of the CPI unit was implemented.
- Identify and assess any new impacts and risks that result from undertaking the activity.
- Critically evaluate the effectiveness of the EA;
- Identify shortcomings in the EA and EMPr; and
- Identify the need for any changes to the avoidance, management and mitigation measures provided for in the EA and EMPr conditions.

The EIA Regulations are considered applicable to the CPI unit operations. Regulation 34, of the EIA Regulations, provides for the auditing of an environmental authorisation, EMPr and closure plan. Furthermore, **Appendix 7** of Government Notice Regulation (GNR) 982 outlines the required audit report content. The 2014 Regulations, as amended, refer to a minimum audit frequency of five years. This audit is designed to meet the requirements of Regulation 34 of the EIA Regulations, 2014. **Table 2-1** indicates where the requirements of Section 34 and **Appendix 7** are met within this audit report.

Table 2-1 - Regulation 34 and Appendix 7 of the EIA Regulations (2014)

Sub-Section	Requirement	Report Section Reference
34 (2)a	The environmental audit report must be prepared by an independent person with the relevant environmental auditing expertise.	Sub-section 1.3 and CV's provided in Appendix A
34(2)b	The environmental audit report must provide verifiable findings, in a structured and systematic manner, on: (i) the level of performance against and compliance of an organisation or project with the provisions of the requisite environmental authorisation or EMPr and, where applicable, the closure plan; and (ii) the ability of the measures contained in the EMPr, and where applicable the closure plan, to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity;	Audit checklist tables provided in Section 4
3(a)	The environmental audit report must determine (a) the ability of the EMPr, and where applicable the closure plan, to sufficiently provide for the avoidance, management and mitigation of	Section 4

Sub-Section	Requirement	Report Section Reference
	environmental impacts associated with the undertaking of the activity on an ongoing basis and to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility; and	
3(b)	The environmental audit report must determine the level of compliance with the provisions of environmental authorisation, EMPr and where applicable, the closure plan.	Section 4
4(a)	Where the findings of the environmental audit report indicate: (a) insufficient mitigation of environmental impacts associated with the undertaking of the activity (b) insufficient levels of compliance with the environmental authorisation or EMPr the holder must, when submitting the environmental audit report to the competent authority submit recommendations to amend the EMPr or closure plan in order to rectify the shortcomings identified in the environmental audit report	Section 4
a	Details of- (i) the independent person who prepared the environmental audit report; and (ii) the expertise of independent person that compiled the environmental audit report.	Sub-section 1.3 CVs provided in Appendix A
b	A declaration that the independent auditor is independent in a form as may be specified by the competent authority.	Sub-section 9
c	An indication of the scope of, and the purpose for which, the environmental audit report was prepared.	Sub-section 1.1 and Section 2
d	A description of the methodology adopted in preparing the environmental audit report.	Section 3
e	An indication of the ability of the EMPr, and where applicable, the closure plan to- (i) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis; (ii) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility; and (iii) ensure compliance with the provisions of environmental authorisation, EMPr, and where applicable, the closure plan.	Section 4
f	A description of any assumptions made, and any uncertainties or gaps in knowledge.	Sub-sections 0 and 2.2
g	A description of any consultation process that was undertaken during the course of carrying out the environmental audit report.	Sub-section 3.2
j	A summary and copies of any comments that were received during any consultation process.	Not applicable

Sub-Section	Requirement	Report Section Reference
k	Any other information requested by the competent authority.	None requested

2.1 DISCLAIMER

This Report has been prepared by WSP on behalf and at the request of Sasol in terms of Regulation 34 of the EIA Regulations.

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

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

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

Although WSP exercises due care and diligence in rendering services and preparing documents, WSP accepts no liability, and Sasol, by receiving this document, indemnifies WSP and its directors, managers, agents and employees against all actions, claims, demands, losses, liabilities, costs, damages and expenses arising from or in connection with the services rendered, directly or indirectly by the use of the information contained in this document.

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

2.2 ASSUMPTIONS AND LIMITATIONS

WSP noted the following assumptions and limitations during the audit:

- The information provided by Sasol is up to date and accurately represents the Sasol Sasolburg operations.
- WSP viewed as much of the operational area as possible given the timeframe and access limitations.
- Findings made within the previous audit reports are correct; and
- Site photographs are not provided in the audit report due to the onsite Sasol Sasolburg policy that disallows any photographs being taken on site. Where conditions were deemed compliant, and

the evidence provided was onsite observation and verbal confirmation to support the findings.; this was observed by the Auditors.

This report has been prepared by WSP at the request of Sasol and the Terms of Reference as detailed in **Section 1.1**.

3 AUDIT METHODOLOGY

The International Organisation of Standardisation (ISO) 14010, ISO 14011 and ISO 14012 guideline documents were utilised as a template during the compliance audit process. This methodology ensures that the compliance audit was conducted in a systematic and independent manner that was documented and objectively evaluated to determine compliance to the EA commitments.

The audit process comprised the following:

- Confirmation of the audit checklist;
- Site inspection (**16 July 2024**);
- Review of documentation relevant to the commitments of the EA and EMPr (e.g. records, permits, certificates, maintenance logs, monitoring results, previous audit reports, specialist reports (where available and applicable), etc.); and
- Compilation of an audit report.

3.1 AUDIT CHECKLIST

WSP compiled a checklist of the EA and EMPr commitments, which was used as an auditing compliance tool. Refer to **Table 4.1** and **Table 4.2** for the audit checklist.

3.2 SITE INSPECTION AND INTERVIEWS

An onsite inspection was conducted on **16 July 2024** during which findings and observations were recorded and are summarised in **Section 4**. Key personnel interviewed during the audit included:

- Suyen Van Zyl – SHE Environmental Specialist;
- Don Hauman – Area Manager; and
- Sello Malifani – Process Engineer.

3.3 INFORMATION CONSIDERED

Information related to the following categorises was reviewed, where required, and used to evaluate compliance:

- Air Emissions Licence (AEL) (reference number: FDDM-MET-2013-24-R1);
- Application for Amendment of an Environmental Authorisation (Ref no: EM1/1 (C) /00/17) dated 28 November 2017, 12 February 2018 and 22 October 2019;
- Environmental Standards;
- External Audit of EA/RoD/EMP/EMPrs: W&S Catalyst Production Increase at S4200 (ref: CEM 2018/141) Draft Report November 2019;
- External report: Acknowledgement Letter from DESTEA dated 01 February 2021;
- Health and Safety Standards and Audits;

- Sasol HAZOP (Section 4200);
- Sasolburg and Ekandustria Operations Annual Emission Report dated 29 August 2023;
- The reporting, investigation and recording of environmental incidents (SSP-S-013) dated 25 July 2019;
- The reporting, investigation and recording of environmental incidents (SSP-S-013) dated 25 July 2019;
- Waste Management and Disposal Registers; and
- Water Use Licence (WUL) (reference number: 14/C22K/FG/4958)

3.4 ASSESSMENT EVALUATION METHODOLOGY

The consolidated report contains all commitments, which were formulated as part of the original and amended EA and EMPr. Each commitment contained in the audit checklist was assessed by reviewing site documentation, interviewing employees, and undertaking a site inspection. The implementation of the mitigation measures in the EMPr was assessed and the level of compliance rated (compliance categories contained in **Table 3-1**). The compliance of the operations listed in **Section 4** was assessed.

Table 3-1 Levels of Compliance

Compliance Level	Definition
Compliant (C)	<p>When an activity or commitment has been implemented, completed, is on-schedule or is maintained on an ongoing basis.</p> <p>Condition/mitigation measure/commitment has been achieved with evidence provided in the form of a document or site verification.</p>
Non-compliant (NC)	<p>When an activity or commitment has not been complied with in its entirety/certain aspects thereof have not been addressed.</p> <p>When a commitment has not been undertaken, not been completed according to plan, or where any unlawful actions have been identified. Non-compliant conditions are given target completion dates as follows:</p> <ul style="list-style-type: none"> — Short term: 0 – 6 months. — Medium term: 6 – 12 months. — Long term: 12 - 18 months
Not applicable (N/A)	<p>The condition, commitment and/or mitigation measure is not applicable or is to be revised in accordance with current practice.</p> <p>A “Not Applicable” finding is also noted in event where such condition, commitment and/or mitigation measure is not yet relevant but is still relevant for future activities.</p>

4 AUDIT FINDINGS

4.1 ENVIRONMENTAL AUTHORISATION

Table 4-1 below provides the level of compliance with the conditions within the EA and associated amendments.

Table 4-1 - Environmental Authorisation (reference: EM1/1 (C)/00/17) dated 22 February 2002, Amendment (reference EM1/1 (c)/00/17) dated 28 November 2017, Amendment (reference: EM1/1 (C) /00/17) dated 12 February 2018, and Amendment (reference: EM1/1 (C) /00/17) dated 22 October 2019 Audit Findings

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
Specific Conditions				
i)	Mitigation measures outlined in the Scoping report must be implemented	C	The mitigation measures in the scoping report were incorporated as an EMP which were implemented and adhered to as assessed in Table 4-2.	None.
ii)	All waste produced during the construction phase must be removed and disposed of in a proper manner.	N/A	The project is currently in operational phase. The condition is considered not applicable.	None.
iii)	Emissions from the plant must be maintained within the acceptable emission standards as per Air Pollution Prevention Act.	C	Emissions from the CPI plant is managed in strict accordance with the conditions of the Atmospheric Emissions License (AEL) (reference number: FDDM-MET-2013-20-R1). The Annual Emission Report for 2023 has confirmed that all emission units at the Wax and Solvents division, which encompasses the CPI plant, are in full compliance with the stipulations of the AEL.	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<i>Evidence:</i> <ul style="list-style-type: none"> AEL (FDDM-MET-2013-20-R1) dated 01 April 2019 Annual Emission Report dated 29 August 2023 	
Standard Conditions				
i)	The Applicant must advertise this Record of Decisions.	N/A	Noted. The advertisement for the RoD was considered for the pre-construction and construction phase; this condition is outside the audit period and therefore not applicable.	None
ii)	This ROD does not exempt any person from the requirements of any other controlling authority or from any other law and does not purport to interfere with the right of any person who may have an interest in the property in question.	N/A	Noted. This current audit scope did not cover a legal review of compliance of the CPI unit and the Sasol One Operations with all statutory requirements and whether they were in possession and compliance of all the necessary permits, authorisations or any other official documents.	None
Key Factors in Decision				
i)	The applicant has complied with the regulations to the satisfaction of the department	N/A	<p>Noted. The previous external audit report was submitted to the Department on 29 November 2019. DESTEA acknowledged receipt of the audit report, and no comments were received thereafter.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> External Audit of EA/RoD/EMP/EMPrs: W&S Catalyst Production Increase at S4200 (ref: CEM 2018/141) Draft Report November 2019 External report: Acknowledgement Letter from DESTEA dated 01 February 2021 	None

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
ii)	There are no protected or red data plant and animal species on or near the site	N/A	<p>No protected or red data plant and animal species were observed or identified during the audit period.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation Visual Site Observation 	None
iii)	No historical, cultural or archaeological sites are found on the site	N/A	<p>No historical, archaeological features or cultural sites noted onsite.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 	None
iv)	There are no sensitive areas (e.g. wetlands) on the site where the plant will be located	N/A	<p>The CPI plant is located in Sasol One site which is a concrete paved and industrial area, therefore no sensitive areas are present on site.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 	None
v)	The unit will pose no visual impacts as the site is situated in an already industrialised area	N/A	<p>The CPI plant is located in Sasol One site which is a concrete paved and industrial area, therefore there is no expected visual impacts.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 	None
vi)	There will be no effect on ground water, surface water, fauna and flora as the plant will be put on existing plant within the existing Sasol Chemicals Industries factory.	N/A	<p>The CPI plant is located in Sasol One site which is a concrete paved and industrial area, therefore there will be</p>	None

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			no expected impact on ground water, surface water, fauna and flora. <i>Evidence:</i> ■ Visual Site Observation	
Duration and date of expiry				
	This ROD is valid for 5 years from the date of approval, unless the plant is modified and/or relocated, in which case it becomes invalid	N/A	Noted. The CPI plant has not been modified or relocated.	None
Appeal				
	An appeal under Section 35(3) of the Act, must be done in writing within 30 days from the date on which this ROD was approved and should be directed to: The MEC: DEAT Free State Province BLOEMFONTEIN 9300	N/A	Noted.	None



4.2 ENVIRONMENTAL MANAGEMENT PROGRAMME

Table 4-2 below provides the compliance of Sasol with the conditions within the EMP that were included in the Scoping Report for the Catalyst Production Increase at Section 4200 on the Sasol One site in Sasolburg, dated 27 January 2000.

Table 4-2 - Environmental Management Programme Audit Findings

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMP Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
6.2 Land, soil, groundwater								
	Because the modifications will take place within an industrial area there will be little effect on land and soil. The new equipment is placed in the existing structure. Because of the concrete floor beneath the equipment, there should be virtually no effect on groundwater if spills of NaNO ₃ (wash water) do occur. The modifications should actually result in less spills and leaks, thus again less likelihood of groundwater contamination	C	<p>The auditor observed that any potential spills from wash water will collect on concreted surfaces therefore the likelihood of groundwater contamination is very low. All spillages are reported and cleaned up in accordance with the Environmental Incident procedure (SSP-S-013).</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none">■ The Reporting, Investigation and Recording of Environmental Incidents	N/A	None	N/A	N/A	N/A

CATALYST PRODUCTION INCREASE - 4200 (REF. NO: EM1/1 (C)/00/17) AND ENVIRONMENTAL MANAGEMENT PROGRAMME AUDIT

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			(SSP-S-013) dated 25 July 2019 ■ Visual Site Observation					
6.3 Air quality								
	There will be no change in the air quality as a result of this project. The NOx that are generated in the process is absorbed in the Nitric Acid Plant. Therefore, the amount of NOx released to the atmosphere at S3600 will not increase.	C	<p>The auditor was informed that the recovered NOx from the CPI plant is routed to Section 3600 for the heat wax process and does not increase the NOx capacity at Section 3600.</p> <p>Emissions from the CPI plant is managed daily by the designated operator in strict accordance with the requirements of the Atmospheric Emissions License (AEL) (reference number: FDDM-MET-2013-20-R1). The Annual Emission Report for 2023 has confirmed that all emission units at the Wax and Solvents division, which encompasses the CPI plant, are in full compliance with the stipulations of the AEL.</p> <p><i>Evidence:</i></p>	N/A	None	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			<ul style="list-style-type: none"> AEL (FDDM-MET-2013-20-R1) dated 01 April 2019 Annual Emission Report dated 29 August 2023 Verbal Confirmation 					
6.4 Surface Water								
	The filter cake wash water that is generated is sent to the salt plant where it is utilised and recovered. The rest of the water will be integrated with the existing waste water for the plant.	C	<p>The auditor was informed that only the wash water from the filter cake is directed to the salt plant. All other wash water is channelled to sumps and/or drains, managed in compliance with the site's Water Use License. The majority of this water is utilised specifically for washing the filter cake.</p> <p>The Auditor was informed that Sasol intends to amend the EMPr in 2024.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation DFFE Notification of Amendment to EMPr form 	<p><i>OFI:</i></p> <p>IT is Recommended that Sasol amends this condition to accurately reflect the current routing if water.</p>	None	N/A	N/A	N/A
6.5 Solid/ Liquid wastes								

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
	Off-spec catalyst is removed by a licensed waste management company.	C	<p>The auditor was informed that off-spec catalyst is removed by a licensed waste service provider. In the past, off-spec catalyst was recycled; however, the current catalyst is no longer recycled and is instead handled by a licensed waste management company.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation DFFE Notification of Amendment to EMPR form 	N/A	None	N/A	N/A	N/A
6.6. Transportation of products								
	<p>Not applicable due to the nature of the project. As the modifications will take place in a dedicated industrial area, there will be no impact on this aspect of the environment.</p> <p>The transport routes will not be covered in the EIA.</p>	N/A	The project is currently in operational phase. The condition is considered not applicable.	N/A	None	N/A	N/A	N/A
6.6 Socio Economic Effect								

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
	<p>There will be a minor positive impact on this aspect of the environment, as there will be an increased employment of people during the construction phase of the project.</p> <p>There will be no impact on the surrounding community as the project is within SCI boundaries.</p>	N/A	Noted	N/A	None	N/A	N/A	N/A
7. Fauna and Flora								
	As the modifications will take place in a dedicated industrial area, there will be no impact on this aspect of the environment	N/A	The project is currently in operational phase. The condition is considered not applicable.	N/A	None	N/A	N/A	N/A
8. Safety Risk and Risk Assessment								
	SASOL's FMEA (Failure Mode Effect Analysis) was conducted on catalyst production increase project. These are studies where the whole process and all the equipment involved is reviewed in detail by the engineering design and operation team, and potential failures or departures in the normal mode of operation are assessed. Safety procedures are	N/A	<p>This condition is outside the audit period and therefore was not audited.</p> <p>This condition was applicable during pre-construction and construction to inform the design of the CPI plant.</p> <p>However, risk assessments are done to identify and mitigate any potential risks.</p>	N/A	None	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
	developed to cancel or ameliorate the effects of such equipment malfunctions/operator error		<i>Evidence:</i> <ul style="list-style-type: none"> Sasol HAZOP (Section 4200) 					
9 Legal Requirements and Public Participation								
	The EIA regulations state that it is a legal requirement to conduct an EIA on the construction or upgrading of transportation routes and structures, and manufacturing, storage, handling or processing facilities for any substance which is dangerous or hazardous and is controlled by national legislation". As mentioned in Section 5.1 copper, iron and nitric acid are listed as Hazardous Chemicals under the Hazardous Substances Act, 1973 (Act No 15 of 1973) and the OSH Act, 1993 (Act No 85 of 1993). The EIA report on such an activity must be submitted for approval and authorization to proceed with the activity to the Free State Department of Environmental Affairs and Tourism (FSDEAT). It was to be	N/A	The project is currently in operational phase. The condition is considered not applicable.	N/A	None	N/A	N/A	N/A



Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
	also thought not necessary to have public participation because the project will have no negative impact on the public outside of Sasol.							

5 PROGRESS AGAINST PREVIOUS AUDIT FINDINGS

The previous EA and EMPr compliance audit report was compiled by the Northwest University CEM in 2018. A comparison in the change of compliance rating between the 2018 and 2024 audits are provided in **Figure 5-1** and **Table 5-1** below, and provides a summary of the audit findings for the previous and current audits (2019 and 2024). The 2024 audit identified zero non-compliant conditions.

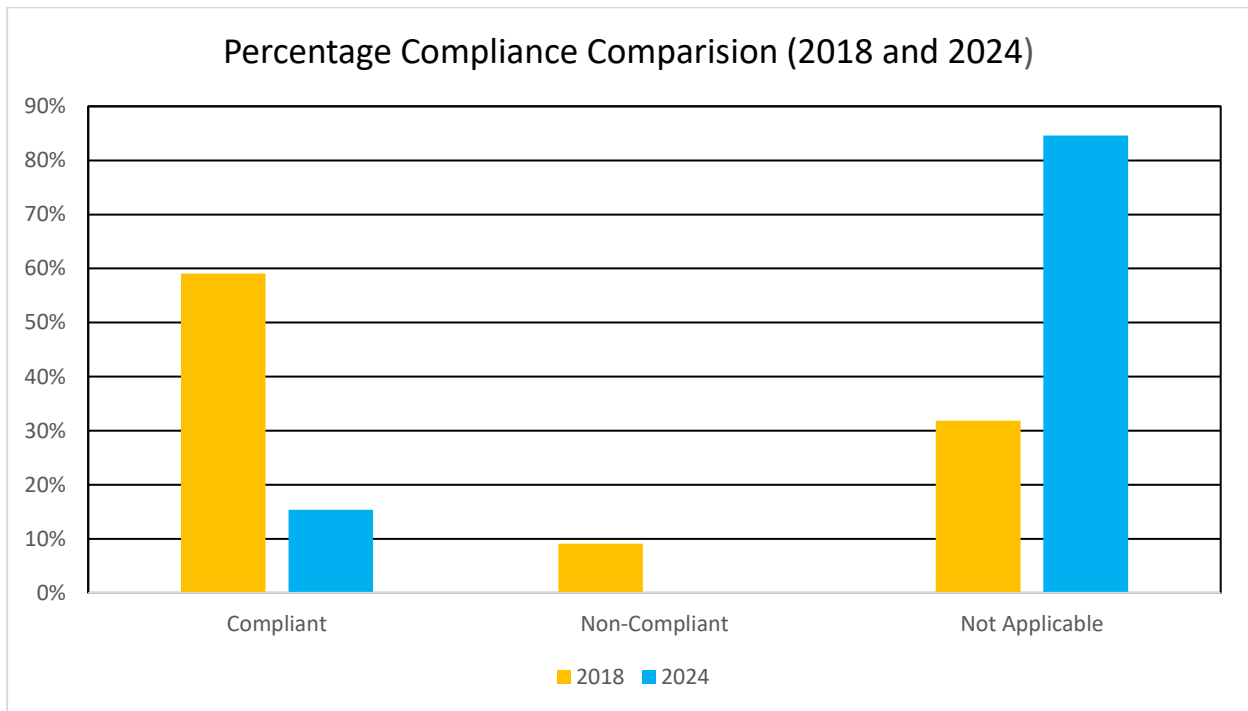


Figure 5-1 – Percentage comparison of Environmental Authorisation compliance levels from 2018 to 2024

Table 5-1 – Progress against previous findings

Ref	Commitment	2018 Status	2018 Finding	2024 Status	2024 Finding
EMPr Conditions					
6.4 Surface Water					
	The filter cake wash water that is generated is sent to the salt plant where it is utilised and recovered. The rest of the water will be integrated with the existing waste water for the plant	NC	At the time of the audit it was communicated to the auditor that only filter cake wash water that is generated is sent to the salt plant where it is utilised and recovered. The other wash water is sent to the sumps and/or drains. This is a non-compliance to	C	The auditor was informed that only the wash water from the filter cake is directed to the salt plant. All other wash water is channelled to sumps and/or drains, managed in compliance with the site's Water Use License. The

Ref	Commitment	2018 Status	2018 Finding	2024 Status	2024 Finding
			condition 6.4: Surface water quality and utilization (page 8 of 22) of the EIA Scoping Report for Catalyst Production Increase at Section 4200 which requires that the wash water that is generated is sent to the salt plant where it is utilized. It is recommended that this condition in the said scoping report be amended to reflect the practice on the ground.		majority of this water is utilised specifically for washing the filter cake. The auditor was informed that Sasol intends to amend the EMPr in 2024.
6.5 Solid/ Liquid wastes					
	Off-spec catalyst is removed by a licensed waste management company.	NC	At the time of the audit it was communicated to the auditor that off-specification catalyst is not recycled. The off-specification catalyst is removed from the site by a licenced waste removal company and disposed of at a non-hazardous landfill site. This is a non-compliance to condition 6.5: Soil/liquid wastes (page 8 of 22) of the EIA Scoping Report for Catalyst Production Increase at Section 4200 which requires recycling of off specification and catalyst fines (X974) is the project that will look after any off specification catalyst that will be produced. It is recommended that this condition in the said scoping report be amended to reflect the practice on the ground.	C	The auditor was informed that off-spec catalyst is now removed by a licensed waste service provider. In the past, off-spec catalyst was recycled; however, the current catalyst is no longer recycled and is instead handled by a licensed waste management company.

6 SUMMARY OF THE AUDIT FINDINGS

6.1 SASOL SASOLBURG CPI SECTION 4200 EA COMPLIANCE

The audit findings have been summarised into the following categories: compliance, non-compliance and not applicable. The overall audit findings concerning compliance to the EA conditions are listed in **Table 6.1** below.

Table 6-1 - Summary of EA Compliance Audit Findings

Section of the EA	No. Commitments	C	NC	N/A
Specific Conditions	3	2	0	1
Standard Conditions	2	0	0	2
Key Factors in Decision	6	0	0	6
Duration and date of expiry	1	0	0	1
Appeal	1	0	0	1
Total	13	2	0	11
Total Percentage		15%	0%	85%
Percentage Compliance with Applicable Conditions	100%			

Figure 6-1 illustrates the number/count contribution of the findings of the EA conditions per section while **Figure 6-2** presents the total proportion of compliance for the EA.

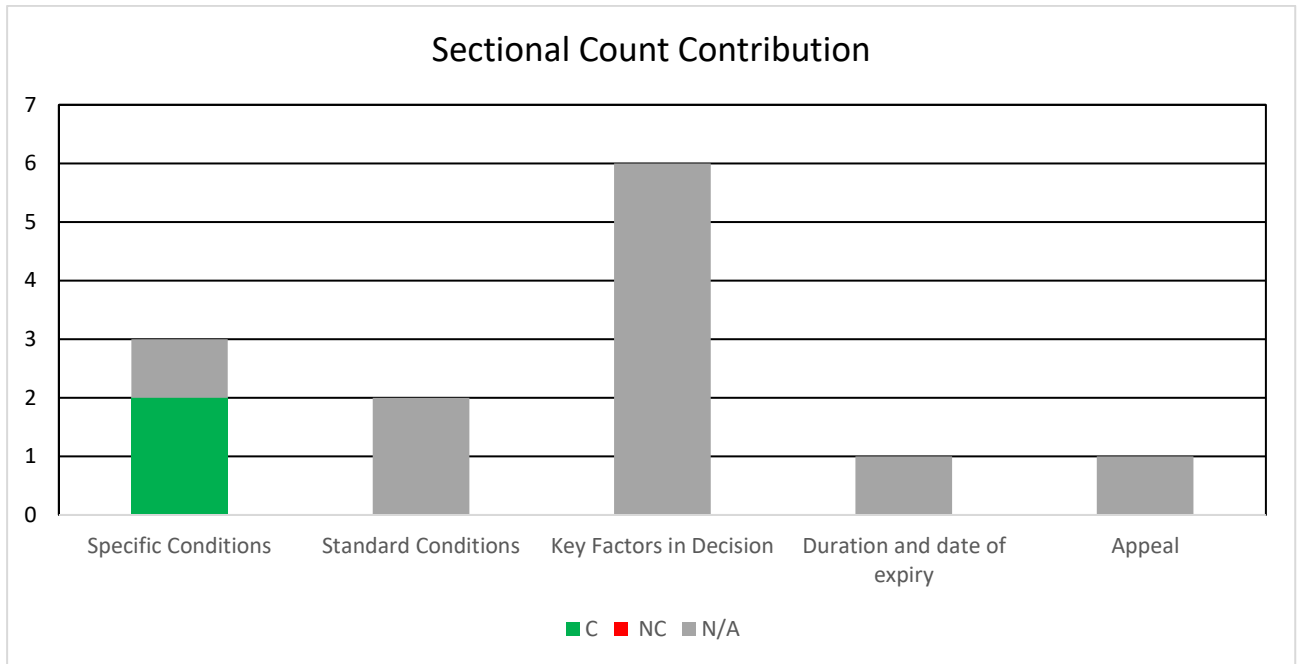


Figure 6-1 - Number/Count contribution of findings made to the EA conditions per section

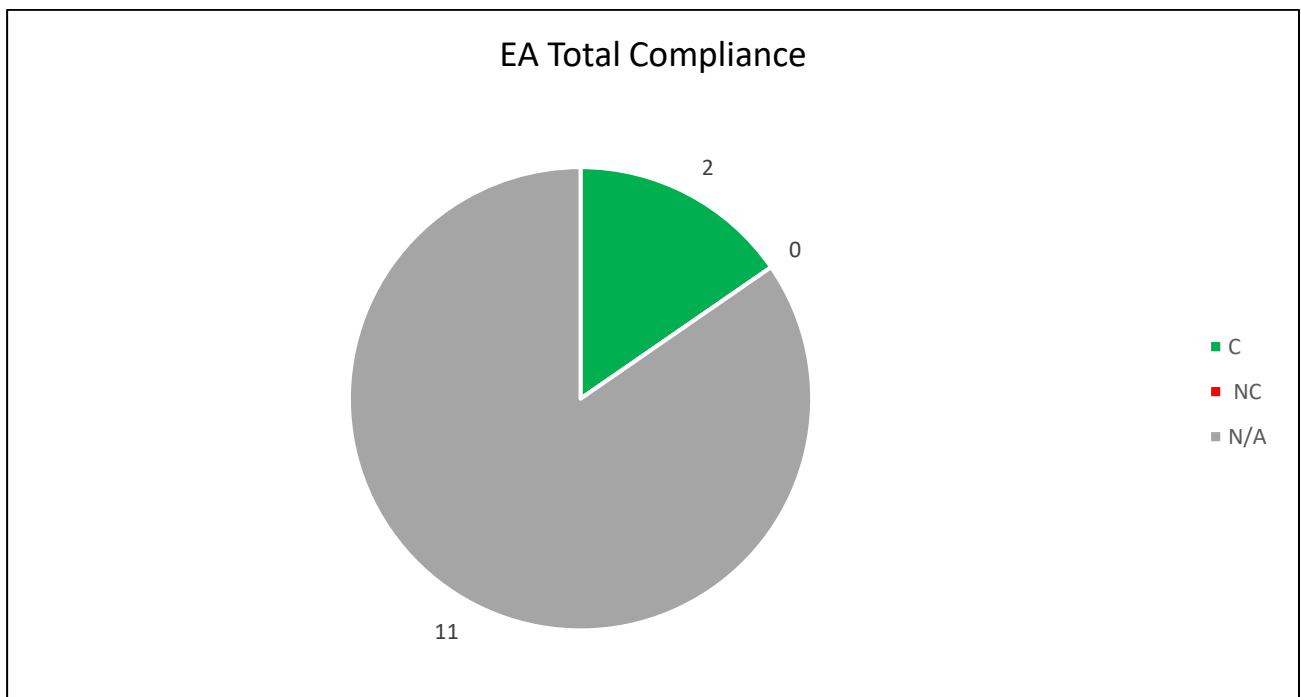


Figure 6-2 - Overall count findings on compliance to the EA commitments

Figure 6-3 illustrates the percentage contribution of the findings of the EA commitments and **Figure 6-4** presents the total percentage compliance for the facility.

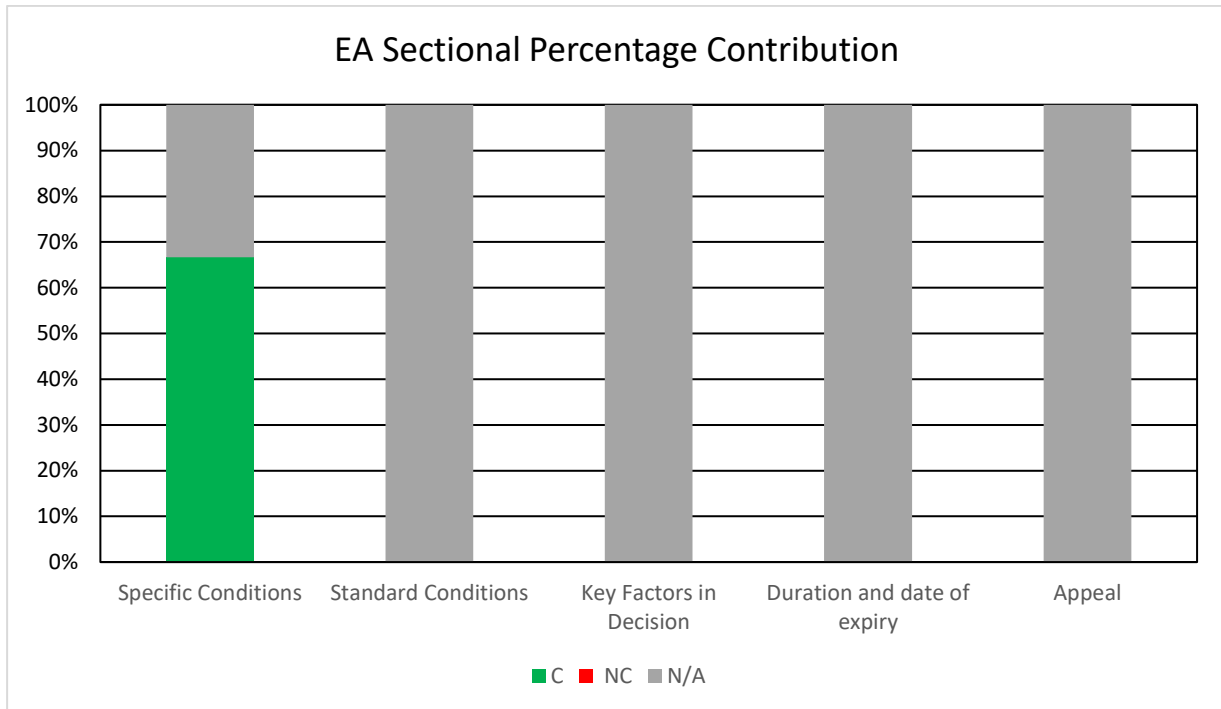


Figure 6-3- Percentage contribution of findings made to the EA Commitments per Section

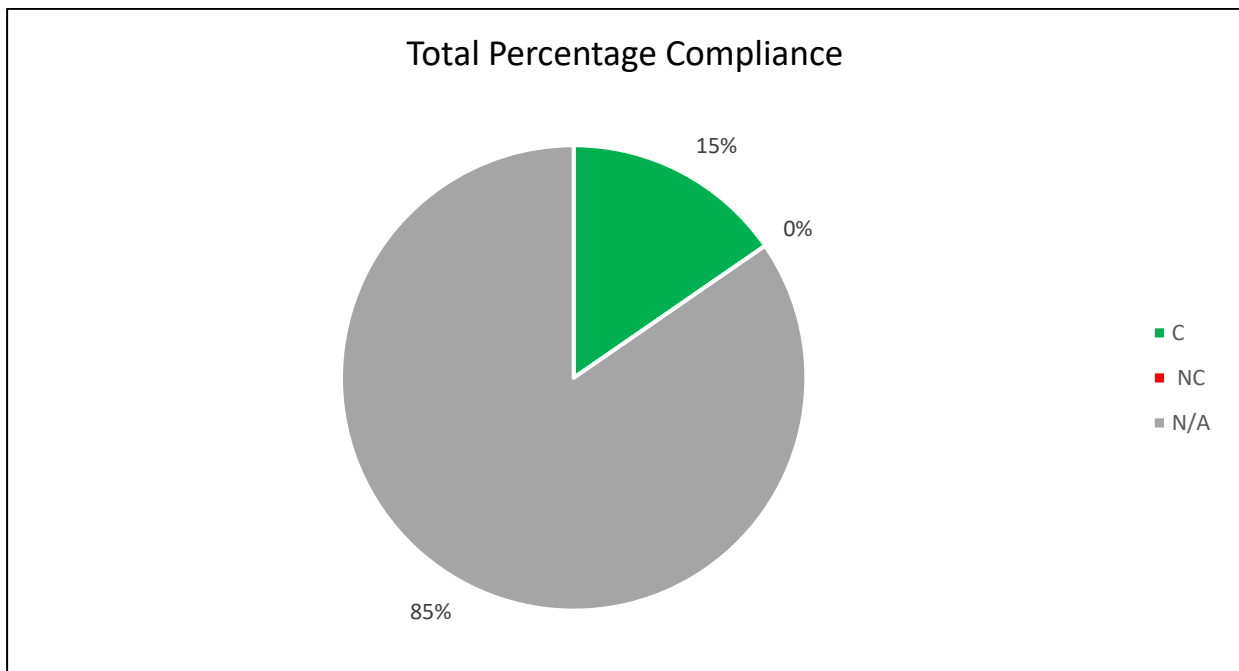


Figure 6-4 - Overall percentage findings on compliance to the EA Commitments

6.2 SASOL SASOLBURG CPI SECTION 4200 EMPr COMPLIANCE

The audit findings have been summarised into the following categories: compliance, non-compliance and not applicable. The overall audit findings concerning compliance to the EMPr conditions are listed in **Table 6-2** below.

Table 6-2 - Summary of EMPr Compliance Audit Findings

Section of the EMPr	No. Commitments	C	NC	N/A
Land and Soil	1	1	0	0
Air quality	1	1	0	0
Surface Water	1	1	0	0
Solid/ Liquid wastes	1	1	0	0
Transportation of products	1	0	0	1
Socio Economic Effect	1	0	0	1
Fauna and Flora	1	0	0	1
Safety Risk and Risk Assessment	1	0	0	1
Legal Requirements and Public Participation	1	0	0	1
Total	9	4	0	5
Total Percentage		44%	0%	56%
Percentage Compliance with Applicable Conditions	100%			

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

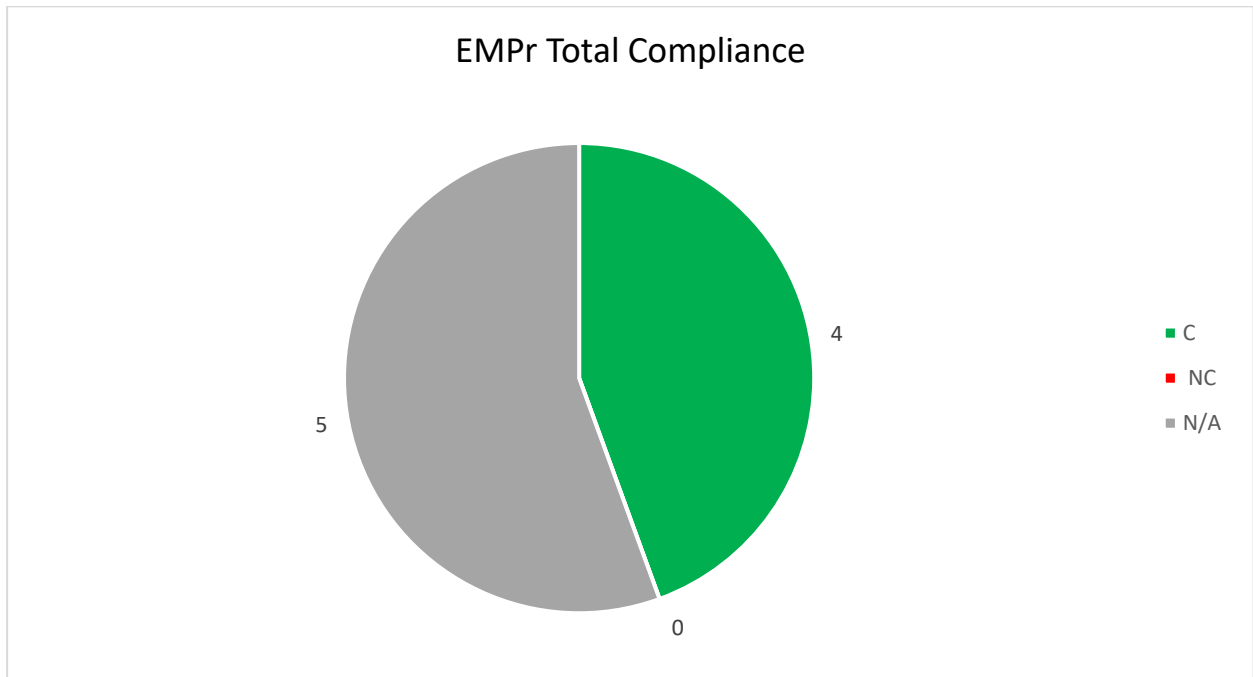


Figure 6-5 - Overall count findings on compliance to the EMPr Commitments

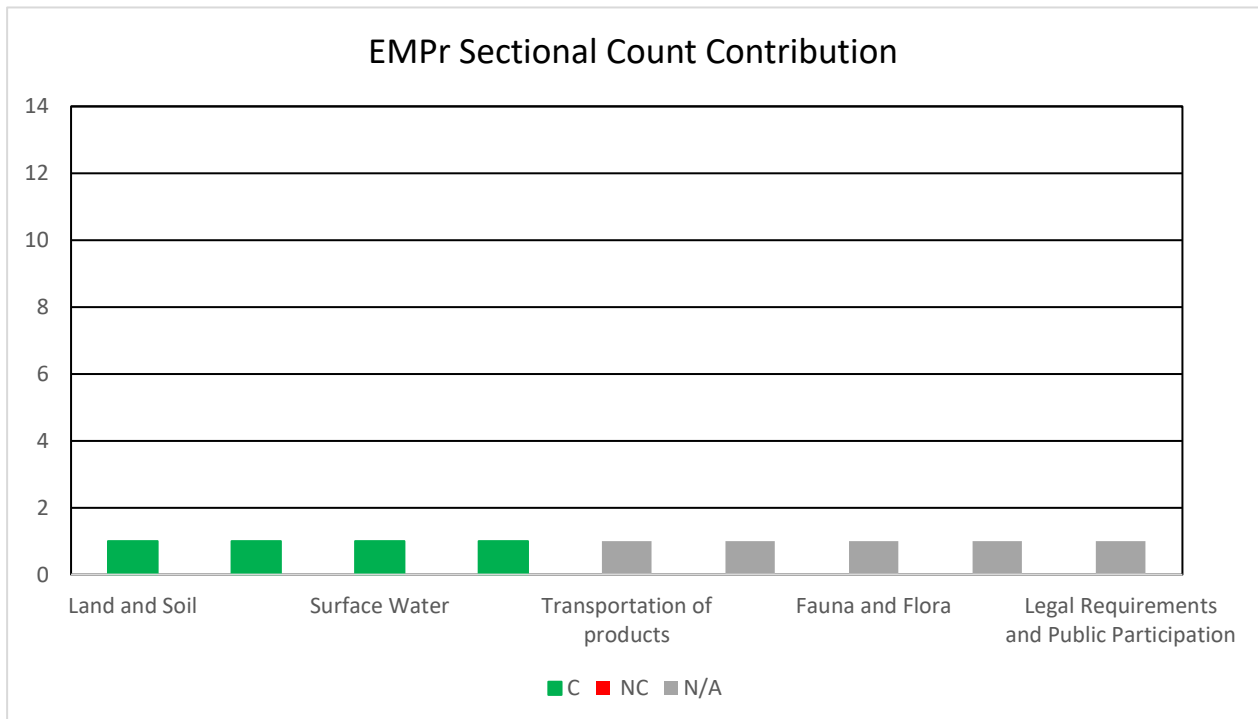


Figure 6-6 - Number/Count contribution of findings made to the EMPr Commitments per Section

Figure 6-7 presents the total percentage compliance for the facility and **Figure 6-8** illustrates the percentage contribution of the findings of the EMPr commitments.

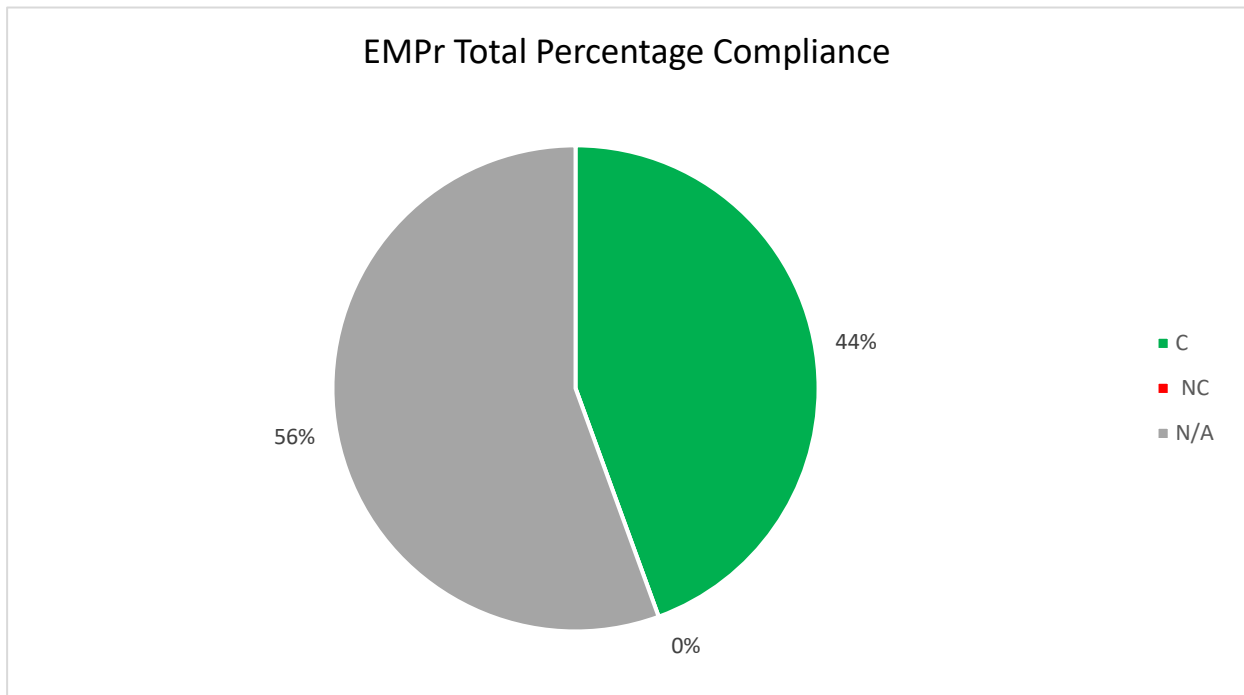


Figure 6-7 - Overall percentage findings on compliance to the EMPr Commitments

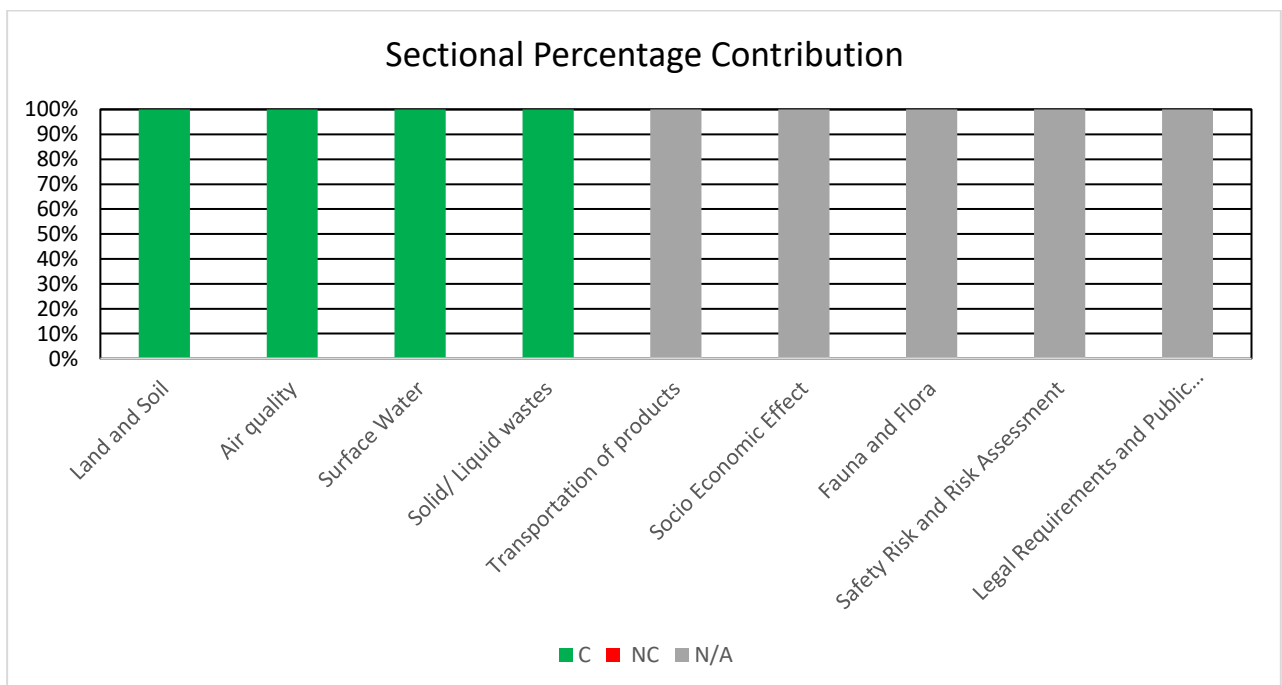


Figure 6-8 - Percentage contribution of findings made to the EMPr Commitments per Section

7 RECOMMENDATIONS

There were no recommendations for improvement as 100% compliance was achieved for the EA conditions and EMPr mitigations. Sasol is advised to continue to ensure compliance with the EA conditions and EMPr mitigations.

Sasol is advised to continue with the comprehensive EMS and strategy for detecting environmental risks and resolving incidents and non-compliances identified on site, and to utilize the audit report as an indicator of all areas that need attention.

8 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 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.

9 DECLARATIONS

INDEPENDENT AUDITOR DECLARATION

Appendix 7 of GNR 982 refers to the need for the independent auditor to declare his/her independence of the holder of the EA.

NAME OF INDEPENDENT AUDITOR: _____Matilda Mbazo_____

UNDERTAKING

I, _____Matilda Mbazo_____, the undersigned and duly authorized thereto, by WSP, have studied Sasol CPI Section 4200 and compared the operations to the approved EMPr and compiled this report to the best of my knowledge. This section should be read with **Section 2.**

Signed at _____Midrand_____ on this the _____07 November_____2024

SIGNATURE OF INDEPENDENT AUDITOR

SIGNED IN LINE WITH THE REQUIREMENTS OF NEMA, GNR 982, APPENDIX 7, AS PUBLISHED UNDER THE NATIONAL ENVIRONMENTAL MANAGEMENT ACT (NO. 107 OF 1998), AS AMENDED, READ WITH GNR SECTION 55 OF THE MINERAL AND PETROLEUM RESOURCES DEVELOPMENT ACT, 2002.

Appendix A

AUDITOR CVS



Matilda Mbazo

Earth and Environment, Environmental Planning & Advisory, Graduate Consultant

CAREER SUMMARY

Matilda Mbazo graduated from Monash South Africa with a BSc in Social Sciences (cum laude) in 2021 and completed her BSc Hons in Geography at University of Witwatersrand in 2022. Matilda is currently pursuing her MSc in Environmental Sciences at University of Witwatersrand. Matilda is a Graduate Consultant in the Environmental Planning and Advisory Division of WSP Group Africa based in the Waterfall office. Matilda has close to two years' experience in the environmental field and currently provides technical and strategic input on a diverse range project in the environmental management field, including environmental audits.



2 > years with WSP

Language

Afrikaans, English, Tswana, Ndebele, and Zulu

EDUCATION

Monash South Africa – Bachelor's degree in Social Sciences	3 years
University of Witwatersrand - Bachelor of Science Honours (Geography)	1 year
University of Witwatersrand – Master of Science (Environmental Sciences)	current

PROFESSIONAL MEMBERSHIPS

EAPASA – Environmental Assessment Practitioner Association of South Africa- Registration No. 2023/6394

PROFESSIONAL HISTORY

WSP - Graduate Consultant	current
WSP - Intern	2023
WSP - Vacation Student	2021 - 2022
IIE MSA - Administration Assistant	2020 - 2021
Cotton On Group - Sales Associate	2020 - 2021

PROFESSIONAL EXPERIENCE

Environmental Authorisation Audits

FFS Chloorkop Fired Heater



July 2022 to June 2023

ECO: EA and EMPR Compliance Audit

Environmental Auditor : EA and EMPr Annual Compliance Audit

Sasol South Africa Limited, Sasol Sasolburg EA Audits, South Africa

October 2022

October 2023

July 2024

Environmental Auditor

At the Sasol One and Midlands Complex in Sasolburg, various operations were subject to an external compliance audit against their EA and EMPr criteria.

South 32: Wessels and Mamatwan Mine, EA and EMPr Audits

November 2023

Environmental Auditor : EA and EMPr Compliance Audit

Impala Platinum Holdings Limited

June 2024

Environmental Auditor : Norms and Standards Audit

Sasol South Africa Limited and Wood

July 2024 – July 2025

ECO: EA and EMPR Compliance Audit

Sasol Ekandustria Operations

September 2024 – September 2025

ECO: EA, EMPR and WUL Compliance Audit

Investchem (Pty) Ltd

September 2024

Environmental Auditor : EA and EMPr Compliance Audit

Environmental Management Plans

ArcelorMittal South Africa, South Africa

April 2024

Environmental Management Plan for the proposed Logistics Hub in the Western Cape.

National Petroleum Refiners of SA (Pty) Ltd (NATREF)

June 2024



Environmental Management Plan for the proposed Hybrid Project.

ENERTRAG, South Africa

2024

Amendments/updates of existing EMPs for two wind facilities, one solar facility and a grid connection.

Legal Audits

Sasol South Africa Limited

March 2024

Undertaken the Regulation 34 Compliance Audits for various Third Parties

Barloworld Ingrain

April 2024

Environmental, Health, and Safety Due Diligence (EHS DD) for three facilities

Renewables

ENERTRAG, South Africa

2024

Scoping and Environmental Impact Assessment for Impumelelo Wind Facility

Eskom Holdings SOC Ltd

September 2024

Part 2 amendment of an EA for a solar facility

Dissertations and Research Projects

**Department of Geography, Archaeology and Environmental Studies, University of Witwatersrand,
Master of Science Dissertation.**

2023-2024

To quantify the interactive effects of extreme drought, fire frequency, and mega-herbivory on tree density in a Marula-Knobthorn savanna using Geographic Information Systems and Remote Sensing.

**Department of Geography, Archaeology and Environmental Studies, University of Witwatersrand,
Bachelor of Science (Geography), Research Project**

2022

Assessment of flood impact at the Hennops river, streaming from Tembisa to Centurion, using Remote Sensing and Geographic Information System.



Yvette Mmanasoe

Senior Consultant

CAREER SUMMARY

has 8 years of experience in environmental and social assessments within the agriculture, mining and building industries. She holds a BSc in Environmental Geography from the University of the Free State, an Occupational Health and Safety certificate from the University of Cape Town, a Sustainable Development Goals certificate from the University of Johannesburg and an Introduction to Environmental, Social and Governance (ESG) Certificate from the Corporate Finance Institute. She has experience in applying the International Finance Corporation (IFC) Performance Standards, Public Participation Processes coordination, Stakeholder Engagements, development of Social and Labour Plans, undertaking Social Impact Assessments, and applications for environmental authorisations and licencing.



1 years with WSP

8 years of experience

Area of expertise

Public Participation Process
Social Impact Assessment
IFC Principles

Language

English, Sepedi, Afrikaans, Sesotho, Setswana, Zulu

EDUCATION

BSc Environmental Geography	2015
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ADDITIONAL TRAINING

Occupational Health & Safety	2016
Introduction to ESG	2023
Sustainable Development	2023

PROFESSIONAL MEMBERSHIPS

IAIASA
2023



Yvette Mmanasoe

Senior Consultant

PROFESSIONAL HISTORY

WSP Group Africa (Pty) Ltd

August 2023 – present

Agron Moosrivier (Pty) Ltd

July 2015 – April 2023

PROFESSIONAL EXPERIENCE

Area of expertise

Sub-area (if required)

Thungela Resources, Zibulo Underground Extension Mine, RSA

Year 2021/2022

Role

Coordinate public participation in the EIA process for the environmental authorisation application.

Mafube Coal Mine, Ward 7 & 9 Cemetery ESIA, RSA

Year 2019/2020

Role

Coordinate public participation and conduct the social impact baseline aspect in the Environmental SIA for environmental authorisation to develop a cemetery.

Kriel Housing Development, Kriel Housing Development, RSA

Year 2019/2022

Role

Conduct SIA for the BAR Process



Building 1, Maxwell Office Park
Magwa Crescent West, Waterfall City
Midrand, 1685
South Africa

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Annexure B - 4200

Environmental Management Programme Operational Phase

Mitigations measures identified during the environmental impact assessment, for the operational phase of the project, defining the impact management outcome and impact management actions to enable compliance to this regulation.

Impact management Objective	<i>Impact management Action</i>
1. Land, soil, groundwater Because the modifications will take place within an industrial area there will be little effect on land and soil. The new equipment is placed in the existing structure. Because of the concrete floor beneath the equipment, there should be virtually no effect on groundwater if spills of NaNO ₃ (wash water) do occur. The modifications should result in less spills and leaks, thus again less likelihood of groundwater contamination.	1.1 Any spills of wash water (NaNO ₃) that occurs will be on the concreted floor. Spillages must be reported and cleaned appropriately.
2. Air quality There will be no change in the air quality because of this project. The NO _x that are generated in the process is absorbed in the Nitric Acid Plant. Therefore, the amount of NO _x released to the atmosphere at S3600 will not increase.	2.1 Emissions from the plant must be maintained within the acceptable emission standards as per Air Emission Licence.
3. Surface Water The filter cake wash water that is generated is sent to the salt plant where it is utilised and recovered. The rest of the water will be integrated with the existing wastewater for the plant.	3.1 The filter cake wash water that is generated is sent to the salt plant where it is utilised and recovered. The rest of the water will be integrated with the existing waste water for the plant.
4. Solid/ Liquid wastes Off-spec catalyst is removed by a licensed waste management company	4.1 Off spec catalyst is removed by a licensed waste management company