



Our reference: SO-ENV-1330

29 November 2024

Your Ref: EA nr EMS/1/(e) /07/76

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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.

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 establishment of the Sasol Cobalt Catalyst Manufacturing facility, Environmental Authorisation with reference EMS/1/(e) /07/76, dated October 2024.

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Company Secretary: M du Toit

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 Cobalt Catalyst Manufacturing Facility.

Yours faithfully,

Signed by: Johann Van Wyk
Signed at: 2024-11-29 11:05:59 +02:00
Reason: I approve

Johann Van Wyk

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Annexure A

Audit report.

Sasol Cobalt Catalyst Manufacturing– ref EMS/1/(e) /07/76



Sasol South Africa Ltd

**COBALT CATALYST MANUFACTURING
FACILITY ENVIRONMENTAL AUTHORISATION
(REF. NO: EMS/1(E)/07/76) AND
ENVIRONMENTAL MANAGEMENT PROGRAMME
AUDIT**

Compliance Audit Report: November 2019 - July
2024





Sasol South Africa Ltd

COBALT CATALYST MANUFACTURING FACILITY ENVIRONMENTAL AUTHORISATION (REF. NO: EMS/1(E)/07/76) AND ENVIRONMENTAL MANAGEMENT PROGRAMME AUDIT

Compliance Audit Report: November 2019 - July 2024

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Sasol South Africa Ltd

COBALT CATALYST MANUFACTURING FACILITY ENVIRONMENTAL AUTHORISATION (REF. NO: EMS/1(E)/07/76) AND ENVIRONMENTAL MANAGEMENT PROGRAMME AUDIT

Compliance Audit Report: November 2019 - 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 Environmental Authorisation (EA) (reference number EMS/1(e)/07/76) of the GTL (Gas to Liquid) Cobalt Catalyst Manufacturing facility 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, the amendment of the EA and the EMPr audited for compliance of the Cobalt Catalyst Manufacturing facility at the Sasol One Site are provided below:

- EA for the Cobalt Catalyst Manufacturing facility located at the Sasol One site) in Sasolburg (reference number: EMS/1(e)/07/76), dated 10 September 2008 by the Department of Tourism, Environmental and Economic Affairs now the Department of Economic, Small Business Development, Tourism and Environmental Affairs (DESTEA).
- The first amendment of the whole EA for the Cobalt Catalyst Manufacturing facility located at the Sasol One site) in Sasolburg (reference number: EMS/1(e)/07/76), dated 25 October 2009 and issued to Sasol by the DESTEA.
- The second amendment of the whole EA for Cobalt Catalyst Manufacturing facility located at the Sasol One site) in Sasolburg (reference number: EMS/1(e)/07/76), dated 17 November 2011 and issued to Sasol by the DESTEA.
- The third amendment of the whole EA for Cobalt Catalyst Manufacturing facility located at the Sasol One site) in Sasolburg (reference number: EMS/1(e)/07/76), dated 02 February 2015 and issued to Sasol by the DESTEA. The amendments include:
 - The applicant/ contact person of the EA
- The fourth amendment of the whole EA for Cobalt Catalyst Manufacturing facility located at the Sasol One site) in Sasolburg (reference number: EMS/1(e)/07/76), dated 29 October 2018 and issued to Sasol by the DESTEA. The amendments include:
 - Site coordinates correction
 - The holder of the EA
 - Removal of activity q
- The fifth amendment of the whole EA for Cobalt Catalyst Manufacturing facility located at the Sasol One site) in Sasolburg (reference number: EMS/1(e)/07/76), dated 09 November 2019 and issued to Sasol by the DESTEA. The amendments include:
 - The applicant/ contact person of the EA
 - The holder of the EA
 - Amendment of Conditions 7.2.2; 7.2.4;8.6.1;8.7.1;8.7.2; and 8.7.4.
- EMPr dated June 2008

1.2 PROJECT DESCRIPTION – COBALT CATALYST MANUFACTURING FACILITY

The Cobalt Catalyst Manufacturing Facility is located adjacent to the Tank Farm within the boundary fence of the existing Sasol One Site, in the Sasolburg Industrial Area in the Free State Province. The location is a 'brown fields' site which is surrounded by several existing Sasol plants.

Catalyst manufacturing takes place in a single plant warehouse, with transport between production steps by forklift, gravity of the elevator in the building. Several steps are used to produce catalyst, most of which are operated in batch mode. The steps are operated simultaneously which means that the longest step dictates the overall batch time. The nine steps involved in the Cobalt Catalyst are as follows:

- Step 1 – Support Modification;
- Step 2 – Calcination;
- Step 3 – Impregnation;
- Step 4 – Calcination;
- Steps 5 & 6 – Impregnation and Calcination;
- Step 7 – Reduction;
- Step 8 – Coating; and
- Step 9 – Packaging.

However, step one and two of the nine steps were discontinued as the parlox (step 1) and silicon (step 2) are manufactured in Sasol Germany. Sasol purchases siralox which consists of the parlox and silicon, hence the redundancy of step one and two. In the final step of the cobalt catalyst production process the catalyst will be moulded and packaged in cylindrical shapes that resembles candles known as 'candle machines'.

1.3 PROJECT TEAM

WSP auditors, Matilda Mbazo and Yvette Mmanasoe completed a site inspection of the Cobalt Catalyst Manufacturing facility against the EA conditions (reference: EMS/1(e)/07/76) at the Sasol One 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

Audit Team	Role	Experience
		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 2 years' 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
		8 Years' Experience
		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 Cobalt Catalyst manufacturing facility at the Sasol One site in Sasolburg. This report provides an overview of the level of compliance with the conditions contained in the EA, EA amendments 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 for the Cobalt Catalyst Manufacturing facility;
- Assess the level of compliance with the commitments of the EMPr that was submitted as part of the Scoping Report for the licencing of the Cobalt Catalyst Manufacturing facility, 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 Cobalt Catalyst Manufacturing facility 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 Cobalt Catalyst Manufacturing facility. 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 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	Section 4
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

Sub-Section	Requirement	Report Section Reference
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.	None received
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 were 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** where findings and observations were recorded and are summarised in **Section 4**. Key personnel interviewed during the audit included:

- Suyen Van Zyl; SHE Environmental Specialist;
- Monshe Samuels – Process Engineer;
- Steve Kutumela – Production Technician;
- Sarel Van De Watt – Senior Area Manager;
- Don Hauman – Area Manager.

3.3 INFORMATION CONSIDERED

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

- EA for the Cobalt Catalyst Manufacturing facility (reference number: EMS/1(e)/07/76), dated 10 September 2008;
- Amendments for the Cobalt Manufacturing facility (reference number: EMS/1(e)/07/76);
- EMPr dated June 2008;
- Notification of Change of Contact Details of the Business Representative (Ref: SO-env-1285) dated 08 July 2024;
- External Audit of EAs/EMP: Cobalt Catalyst Manufacturing Facility by Centre for Environmental Management (CEM) (Reference no: CEM 2019/078) dated November 2019;
- Acknowledgement for changes in production process (EM1/1(C)/00/132) dated 01 February 2019
- Air Emissions Licence (AEL) (Reference number: FDDM-MET-2013-22) dated 23 August 2023;
- Sasolburg and Ekandustria Operations Annual Emission Report (August 2023) to ensure compliance with the AEL conditions;
- Water Use Licence (WUL) (reference number: 14/C22K/FG/4958);
- Groundwater Monitoring Report: WUL Compliance (41105760) dated August 2023);
- Internal WUL Audit Report (14/C22K/FG/4958) dated 10 January 2024;
- Skyside Test Report: Compliance Monitoring at Cobalt Catalyst Plant (SAL238 PF) dated 28 June 2024;
- Procedure for the removal of waste from the SEO Sasolburg Sites (SS-S-014) dated 01 August 2022;
- Integrated Water and Waste Management Plan (IWWMP) Rev 7 – report number: SO-env-1192 (Sasolburg Operations, December 2023) that includes the:
 - Stormwater Management Plan (SWMP, 2023);
 - Rehabilitation Strategy and Implementation Plan (RSIP);
 - Water Conservation and Demand Management (WC/DM);
 - Malfunctions register;
 - Water management;
 - Groundwater management;
 - Waste management;
 - Contaminated Water and Wastewater Management;
 - Effluent Management; and

- Land management.
- Waste Management and Disposal Registers;
- Safety Data Sheets;
- Induction materials;
- Incidents register;
- Environmental Standards; and
- Other related approvals documents.

3.4 ASSESSMENT EVALUATION METHODOLOGY

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

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 compliance of Sasol with the conditions within the EA and amendments to the EA.

Table 4-1 - Environmental Authorisation (reference: EMS/1(e)/07/76 dated 10 September 2008) and Amendments (reference: EMS/1(e)/07/76 dated 25 October 2009, 17 November 2011, 02 February 2015, 29 October 2018 and 09 November 2019) Audit Findings

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
1. Decision				
	The Department is satisfied, on the basis of information available to it that, subject to compliance with the conditions of this environmental authorization, the applicant should be authorized to undertake the activity specified below.	N/A	Noted. The RoD was granted on 20 March 2009 and a few conditions were amended as stated in Section 1.1	None.
2. Activities Authorised				
	By virtue of the powers conferred on it by the National Environmental Management Act, 1998 (Act No. 107 of 1998) and Regulation Notice 385 and 386 passed pursuant thereto, the Department hereby authorizes - Sasol Cobalt Catalyst Manufacturing (Pty) Ltd With the following contact details - Mr. Rightwell Laxa	C	The Auditor was informed that the authorised activities for the Cobalt Catalyst Manufacturing facility has not changed since the changes in production process in 2019. The Auditor also observed that the operating facility is located in Sasol One site in Sasolburg, Free State as per the approved coordinates in the EA.	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	<p>SVP Sasolburg Operations</p> <p>Sasol South Africa (Pty) Ltd acting through its Sasolburg Operations P.O. Box 1</p> <p>Sasolburg,</p> <p>1947</p> <p>Tel: +27 16 960 8001</p> <p>To undertake the following activity -</p> <p>Establishment of a Gas to Liquid (GTL) catalyst manufacturing facility for the manufacturing of Sasol's proprietary GTL Catalyst and Modified Alumina Number 13 ('MA 13) 'listed under Regulations Notice 387 activities no 1(e) and q, described as:</p> <p>'The construction of facilities or infrastructure, including associated structures or infrastructure for</p> <p>(e) any process or activity which requires a permit or license in terms of legislation governing the generation or release of emission, pollution, effluent or waste and which is not identified in Government Notice No. R, 386 of 2006.</p> <p>(q) the incineration, burning, evaporation, thermal treatment, roasting or heat sterilization of waste or effluent, including the cremation of human or animal tissue.</p> <p>On a plot in Sasol One Complex, in the Sasolburg Industrial Area which falls within the jurisdiction of the District of Metsimaholo; hereafter referred to as the property/site:</p>		<p>However, based on the information provided, the accountable person and the contact details was changed from "Mr. Rightwell Laxa ", to the following:</p> <p>Ntokozo Gcabashe</p> <p>ntokozo.gcabashe@sasol.com</p> <p>016 960 2007</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation Google Earth Notification of Change of Contact Details of the Business Representative (Ref: SO-env-1285) dated 08 July 2024. Acknowledgement for changes in production process (EM1/1(C)/00/132) dated 01 February 2019 	

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	Site co-ordinates: 26° 49' 31.50"S 27° 50'16.6"E.			
3.1 Scope of Authorization				
3.1.1	Authorization of the activity is subject to the conditions contained in this document, which conditions form part of the environmental authorization and are binding on the holder of the authorization.	N/A	Noted. The Holder of the Authorisation and External Auditor noted this condition.	None.
3.1.2	The holder of the authorization shall be responsible for ensuring compliance with the conditions 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 authorization.	C	<p>Sasol as the holder of the authorisation acknowledges that responsibility for ensuring compliance with the EA and provides environmental management awareness training to staff, service providers, contractors and visitors to ensure that everyone employed or acting on their behalf is aware that they need to comply with the EA and the EMPr conditions. Induction training was provided to all staff, service provides, contractors and visitors.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation Induction Materials Online Training Matrix 	None.
3.1.3	The authorized activity may only be carried out at the property/site indicated above.	C	<p>The authorised activity is carried out at the Sasol One site Complex as within the EA location details.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> EA location details (reference number EMS/1(e)/07/76) Google Earth Visual Site Observation 	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
3.1.4	Any changes to, or deviations from, the project description set out in this authorization must be approved, in writing, by the Department before such changes or deviations 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 or deviations and it may be necessary for the holder of the authorization to apply for further authorization in terms of the regulations.	N/A	Noted. This audit confirmed that there has not been any deviation from the conditions set out in the authorisation documentation.	None.
3.1.5	This environmental authorization is valid for a period of 2 (two) years from the date of issue. If commencement of the activity does not occur within that period, the authorization lapses and a new application for an Environmental Authorization (EA) must be made.	N/A	Noted. This condition is outside the audit period and refers to a requirement prior to commencement and was therefore not audited. The EA was issued in 2008 and the activity commenced within specified time. The facility was operational during the audit period.	None.
3.1.6	This authorization does not negate the holder of the authorization's responsibility to comply with any other statutory requirements that may be applicable to the undertaking of the activity.	N/A	Noted. This audit did not cover a legal review of compliance of the Cobalt Catalyst Manufacturing facility and Sasol with all statutory requirements and whether they were in possession of all the necessary permits, authorisations or any other official documents.	None.
3.2 Appeal of Authorisation				
3.2.1	The holder of the authorization is drawn to the attention that an appeal may be lodged against the decision in terms of Chapter 7 of GNR available in circumstances of the decision.	N/A	Noted. This condition is outside the audit period and refers to a requirement prior to commencement and was therefore not audited.	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
3.2.2	The holder of the authorization must notify all registered and affected party, in writing and within 10 (ten) calendar days of the Department having reached a decision to authorize the activity (Date of issue: date when the applicant receive EA) of the, a. Outcome of the application; and b. The reasons for the decision	N/A	Noted. This condition is outside the audit period and refers to a requirement prior to commencement and was therefore not audited.	None.
3.2.3	The notification referred to in 3.2.1 must - a) Specify the date on which the authorization was issued; b) Inform the interested and affected party of the appeal procedure provided for regulation 62; and c) Advise the interested and affected party that a copy of the authorization and reasons for decision will be furnished on request	N/A	Noted. This condition is outside the audit period and refers to a requirement prior to commencement and was therefore not audited.	None.
3 Management of Activity				
3.1	Adherence to the Environmental Management Plan (EMP) which fulfils the requirements of this authorisation must be compiled and submitted to the Department for approval within fourteen (14) calendar days, of the Department's decision to authorize the activity.	N/A	Noted. This condition is outside the audit period and refers to a requirement prior to commencement and was therefore not audited.	None.
3.2	The Department must be notified, within 30 days thereof, of any change of ownership and/or project developer. Conditions imposed in this EA must be	N/A	The Auditor was informed that there was no change of ownership and/or project developer of the Cobalt Catalyst Manufacturing facility during the audit period.	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	made known to the new owner and/or developer and are binding on the new owner and/or developer.			
4 Monitoring				
4.1	Records related to compliance/non-compliance with conditions of this authorization must be kept in good order. Such records should be made available to this Department within seven (7) days from the date of written request from this Department.	C	<p>Records of compliance/non-compliance with conditions of this authorisation, which include the WUL and EA were kept in good condition and were readily available on SAP-EC system, therefore, should be readily available should the Department require them. No request was made by the Department during the audit period for records or documents. In addition, the previous audit was provided with the records of compliance/non-compliance with conditions of this authorisation.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation External Audit of EAs/EMP: Cobalt Catalyst Manufacturing Facility by Centre for Environmental Management (CEM) (Reference no: CEM 2019/078) dated November 2019 	None.
4.2	Non-compliance with any deviation from the conditions of this authorization as set out in the EA is regarded as an offence, and after reasonable provision has been given for remedial action, will be dealt with in terms of Section 24(f) of the National Environmental Management Act (Act No. 107 of 1998) as well as any other appropriate legal mechanisms.	N/A	Noted. No deviations from the stated conditions within the EA were noted during this audit.	None.
5. Recording and Reporting				

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
5.1.1	The holder of the authorization must submit an environmental audit report to the Department, once during operation of the facility (establishment of GTL Manufacturing Facility) and once during decommissioning of the facility.	C	<p>The external environmental audit by CEM was submitted to the Department for the operational phase in 2019.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> External Audit of EAs/EMP: Cobalt Catalyst Manufacturing Facility by Centre for Environmental Management (CEM) (Reference no: CEM 2019/078) dated November 2019 Notification letter for external audit submission (SO-env-614) dated 29 November 2019 	None.
5.1.2	<p>The environmental audit report must contain the following:</p> <ul style="list-style-type: none"> Activity, Targets, Conformance/non-conformance, Performance indicator; and comments. 	C	<p>This report meets the requirements stated in the EA.</p> <p>The following is contained in the following sections:</p> <ul style="list-style-type: none"> Activity stated in Section 1.2; Target stated in Figure 5-1; Conformance/non-conformance stated in Section 4; Performance indicator stated in Section 6; and Comments stated in Section 7 and Error! Reference source not found.. 	None
5.1.3	This environmental audit report must be compiled by an independent auditor.	C	This environmental audit report was compiled and completed by an independent Auditor, WSP Group Africa as per the team mentioned in Section 1.3 .	None.
6 Commissioning of the activity				
6.1	Seven (7) days prior written notice must be given to the Department that the activity will commence. The notice must include a date on which it is anticipated that the activity will commence.	N/A	This condition is outside the audit period and refers to a requirement prior to commencement of the construction phase and was therefore not audited.	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
7 Construction and Operation of the Facility				
7.1. Water Supply				
7.1.1	During construction, the contractor lay-down area must allow for surface water run-off to flow directly into the existing Sasol One facility surface water run-off system to ensure no potential contamination beyond the contractor lay-down area.	N/A	This condition is outside the audit period and refers to a requirement prior to commencement of the construction phase and was therefore not audited.	None.
7.1.2	During operational phase, water saving practices must be implemented through existing environmental management systems and consumption must be monitored and evaluated continuously.	C	<p>The water consumption and water quality on the Sasol One site is managed in accordance with the WUL to ensure saving practices on site. Moreover, the environmental management system is integrated in the SAP EC which is a management intranet tool to ensure and capture proof of compliance with conditions of all licences and authorisations obtained.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation WUL (14/C22K/FG/4958) Internal WUL Audit Report (14/C22K/FG/4958) dated 10 January 2024 	None.
7.2 Air Quality				
7.2.1	Appropriate dust suppression measures must be applied at the construction site to ensure minimal dust entrainment.	N/A	This condition is outside the audit period and refers to a requirement prior to commencement of the construction phase and was therefore not audited.	None.
7.2.2	Sources of emission associated with the operational phase, must be operated in accordance with their	C	The Auditor observed identified a stack during the audit, which is the main source of the emissions at the	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	design specification and all maintenance and repair requirements must be maintained to ensure the National Environmental Management Air Quality Act.		<p>facility. The Auditor was informed that the stack is operated in accordance with the Cobalt Catalyst Manufacturing Standard Operation Procedure (SSP-E-010). Emissions are monitored annually as per the AEL that is in accordance with the National Environmental Management Air Quality Act.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> ■ AEL (Reference number: FDDM-MET-2013-22) dated 23 August 2023 ■ Skyside Test Report: Compliance Monitoring at Cobalt Catalyst Plant (SAL238 PF) dated 28 June 2024 	
7.2.3	Air quality monitoring and modelling must be initiated for this facility to verify the emissions from the process at the start of commissioning.	N/A	<p>This condition is outside the audit period and refers to a requirement prior to commencement of the construction phase and was therefore not audited. However, an Air Dispersion Modelling was conducted pre-commissioning of the Cobalt Catalyst Manufacturing plant.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> ■ Air Dispersion modelling for the Sasol cobalt manufacturing plant, Sasolburg Operations 20191108-AC-MVN-MEM dated 08 November 2019 	None.
7.2.4	Air quality monitoring of the stacks at the Cobalt Catalyst Plant as part of the Cobalt Catalyst Manufacturing Facility, should be monitoring according to the requirements as set out in the National Environmental Management Air Quality Act.	C	<p>The Auditor observed identified a stack during the audit, which is the main source of the emissions at the facility. The Auditor was informed that the stack is operated in accordance with the Cobalt Catalyst Manufacturing Standard Operation Procedure (SSP-E-010). Emissions are monitored annually as per the AEL that is in</p>	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<p>accordance with the National Environmental Management Air Quality Act.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> ■ AEL (Reference number: FDDM-MET-2013-22) dated 23 August 2023 ■ Skyside Test Report: Compliance Monitoring at Cobalt Catalyst Plant (SAL238 PF) dated 28 June 2024 	
7.3 Noise Pollution				
7.3.1	A complaints register must be made available, and should any complaints be received, these should be logged in the complaints register and reported to the responsible person on site.	C	<p>All complaints and incident registers are kept on the SAP-EC system. All open incident or complaints tasks are managed by the area manager in liaison with the Sasol environmental department.</p> <p>No incidents or complaints were recorded for the Cobalt Catalyst Manufacturing facility during the audit period.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> ■ Incidents and complaints register ■ Verbal Confirmation 	None.
8.4 Waste				
8.4.1	Waste must not be stored more than 90 days on site before being disposed of appropriately at a permitted waste disposal facility or recycled where possible.	C	<p>Waste is collected before the skips get overfilled and disposed by waste service provider within less than 90 days. Waste catalyst is the only waste recovered and reused.</p> <p><i>Evidence:</i></p>	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<ul style="list-style-type: none"> EnviroServ waste manifests Averda waste manifests EnviroServ Safe Disposal Certificates Waste register Verbal Confirmation 	
8.4.2	Records of all waste being taken off site must be recorded and kept as evidence of correct disposal.	C	<p>The waste management plan is in accordance with the Sasolburg Site Procedure. The Auditor reviewed the waste manifests kept in the administration office.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Waste Manifests Procedure for the removal of waste from the SEO Sasolburg Sites (SS-S-014) dated 01 August 2022 	None.
8.4.3	Hazardous materials generated during spillages must be cleaned up using absorbent material provided in spill kits on site, and these absorbent materials must be disposed of in separate hazardous waste bins.	C	<p>There were spill kits observed around the site during the audit in case of a spillage event. Sasol Operations manages hazardous spillages in accordance with their SOP for 'Removal of wastes from the Sasolburg Operations sites'.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> SOP for Removal of wastes from the Sasolburg Operations sites (SSP-S-014) dated 01 August 2022 Visual Site Observation 	None.
8.5 Stormwater				
8.5.1	During operational phase, storm water management Pleasures must be applied to ensure that only clean	C	The stormwater management at the Tank Farm is managed in accordance with the Sasol One Stormwater	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	storm water is routed via the Sasol One storm water system.		<p>Management Plan. All water on site is considered 'dirty' water that is routed to Bioworks for reworking.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> SWMP (SO-env-1192) dated December 2023 Verbal Confirmation 	
8.6 Effluent Generation				
8.6.1	Effluent handling is to be undertaken in accordance with Sasol Standard Operating Procedures and the associated Safety Data Sheets (SDS's) for the effluent (where applicable).	C	<p>The Auditor was informed that effluent at the facility is handled in accordance with SOP for tank/ cobalt catalyst manufacturing effluent (SCCM-PRD-40082)and the associated SDS for the effluent were observed during the audit.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation Visual Site Observation SOP for tank/ cobalt catalyst manufacturing effluent - SCCM-PRD-40082 	None.
8.6.2	Effluent handling and storage facilities must be appropriately lined and banded to ensure that spillages are contained.	C	<p>The Auditor observed that all effluent handling and storage facilities are appropriately lined and banded to ensure that spillages of a maximum volume of 110% are contained.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
8.6.3	Record keeping of the effluent handling, storage and transfer must be kept up-to-date and accurate.	C	<p>The Auditor reviewed effluent records during the site audit and noted that all effluent handling, storage and transfer records are up-to-date and accurate.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 	None.
8.7 Safety				
8.7.1	All liquid process chemicals (chemicals used in the manufacturing/ process at the plant) and other hazardous must be stored in designated, bunded areas, where bunded area is impermeable and is impervious to the stored substance. The bunded area must also be able to contain 110% volume of the largest container stored.	C	<p>All process chemicals are stored in a designated area that is impermeably bunded (able to contain 110% volume) and is impervious to the stored substance. The platinum is a valuable reactive metal that is stored in a high security vault with a SDS displayed inside the vault.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation SDS: <ul style="list-style-type: none"> Nitrate dated 27 August 2021; Ammonia Anhydrous dated 04 November 2020; Substances Mixture dated 16 March 2020; Berusynth dated 29 May 2018; Siralox dated 11 December 2021; and Fuel gas dated 26 August 2020. 	None.
8.7.2	Safety Data Sheets must be displayed for all process chemicals (chemicals used in the manufacturing/ process at the plant) and hazardous material on site that may pose a risk to human health or the environment. This must take cognizance of the	C	<p>The SDS is displayed and also stored in a file in the offices adjacent to the Tank Farm.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 	

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	storage, handling, transportation and disposal of chemicals and hazardous materials.		<ul style="list-style-type: none"> ■ SDS: <ul style="list-style-type: none"> • Nitrate dated 27 August 2021; • Ammonia Anhydrous dated 04 November 2020; • Substances Mixture dated 16 March 2020; • Berusynth dated 29 May 2018; • Siralox dated 11 December 2021; and • Fuel gas dated 26 August 2020. 	
8.7.3	All storage facilities must be appropriately lined, maintained and must not seep.	C	<p>The Auditor observed that all effluent handling and storage facilities are appropriately lined and bunded to ensure that spillages of a maximum volume of 110% are contained.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> ■ Visual Site Observation 	None.
8.7.4	All employees must be provided with the appropriate PPE for the activities they required to undertake.	C	<p>The Auditor reviewed the PPE register and confirmed that all Sasol personnel were provided with necessary PPE. The PPE issued by Sasol was able to handle hazardous materials. Sasol does not allow access to workers, contractors and service providers to the plant unless they wear the required PPE to handle hazardous materials.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> ■ PPE Register ■ Visual Site Observation ■ Verbal Confirmation 	None.
8.7.5	Emergency Preparedness and Response Procedures must be provided should an incident or the spillage of hazardous chemicals occur	C	<p>Emergency response for spills and leaks is available for implementation in the event that an incident occurs. Disposal of hazardous chemicals is managed in</p>	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<p>accordance with the SOP for waste. Moreover, there are spill kits managed by Spill Tech around the facility and in the warehouse.</p> <p>No incidents were noted for the Cobalt Catalyst Manufacturing facility during the audit.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation Procedure for the removal of waste from the SEO Sasolburg Sites (SS-S-014) dated 01 August 2022 	
8.8 Site closure and decommissioning				
8.8.1	The closure and rehabilitation of this facility must be planned in advance of decommissioning; and closure must be undertaken in accordance with the rehabilitation and closure plans of the Sasol One Complex.	N/A	This condition is outside the audit period and refers to a requirement of the closure and decommissioning phase and was therefore not audited.	None.
8.10.2	Rehabilitation and closure planning must ensure the protection and rehabilitation of air quality resources both within the Sasol One Complex and the surrounding area.	N/A	This condition is outside the audit period and refers to a requirement of the closure and decommissioning phase and was therefore not audited.	None.
8.10.3	Rehabilitation and closure planning must ensure the protection of surface water and groundwater resources.	N/A	This condition is outside the audit period and refers to a requirement of the closure and decommissioning phase and was therefore not audited.	None.
9 General				
9.1	A copy of this authorization must be kept at the property where the activity will be carried on. The	C	The Auditor identified that a copy of the authorisation was in place on site and on the Sasol SAP-EC.	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	authorization 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 authorization who works or undertakes work at the property.		<i>Evidence:</i> <ul style="list-style-type: none"> Visual Site Observation 	
9.2	Where any of the applicant's contact details change, including the name of the responsible person, the physical or postal address and/ or telephonic details, the applicant must notify the Department as soon as the new details become known to the applicant.	C	<p>The Department was notified about the change of the contact person; this was not a new owner. Changes in the details are provided below:</p> <p>Ntokozo Gcabashe ntokozo.gcabashe@sasol.com 016 960 2007</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Notification of Change of Contact Details of the Business Representative (Ref: SO-env-1285) dated 08 July 2024. 	None.
9.3	The holder of the authorization must notify the Department, in writing and within 24 (twenty-four) hours, if condition 7.1 of this authorization cannot be or is not adhered to. In all other cases, the holder of the authorization must notify the Department, in writing, within 7 (seven) days if a condition of this authorization is not adhered to. Any notification in terms of this condition must be accompanied by reasons for the non-compliance.	N/A	Noted. This report will serve to notify the Department of any non-compliances to this EA. However, condition 7.1 of this EA is applicable to the pre-commencement phase and not the operational phase, therefore the condition is not auditable.	None.
4. Findings				

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
a	All waste generated must be appropriately separated and graded and disposed of at designated and appropriate permitted land fill site.	C	<p>All waste including siralox bags, pallets, platinum containers, and contaminated waste generated on site is separated according to 'high value' and 'low value' categories.</p> <p>The waste is disposed of by a selected waste service provider (EnviroServ, Averda or Interwaste) and disposed at either the Holfontein or Vlaktefontein landfill.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation Waste Manifests 	None.
b	Air quality monitoring and modelling must be continuous at the facility.	C	<p>The Auditor was informed that air quality monitoring is conducted annually although there no AEL for this facility.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Skyside Test Report: Compliance Monitoring at Cobalt Catalyst Plant (SAL238 PF) dated 28 June 2024 	None.
c	Effluent generation must be addressed through treatment, re-cycling and re-use of effluent and record keeping of effluent handling, storage and transfer must be kept up-to-date and accurate.	C	<p>The Auditor reviewed effluent records during the site audit and noted that all effluent handling, storage and transfer records are up-to-date and accurate.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 	None.
4.d	Water saving practices must be implemented and surface water and groundwater resources must be protected by ensuring that the proposed project	C	<p>The water on the Sasol One site is managed in accordance with the WUL to ensure saving practices on site. Moreover, the environmental management system is</p>	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	buildings are fully contained, lined and located on an impervious based.		<p>integrated in the SAP EC which is a management intranet tool to ensure and capture proof of compliance with conditions of all licences and authorisations obtained.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation WUL (14/C22K/FG/4958) Internal WUL Audit Report (14/C22K/FG/4958) dated 10 January 2024 	
4.e	Storm water management measures must be applied ensure that only clean storm water is routed via the Sasol One storm water system.	C	<p>The stormwater management at the Tank Farm is managed in accordance with the Sasol One Stormwater Management Plan. All water on site is considered 'dirty' water that is routed to Bioworks for reworking.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> SWMP (SO-env-1192) dated December 2023 Verbal Confirmation 	None.
4.f	Material Safety Datasheets must be displayed for all chemicals and hazardous materials stored on site and Emergency Preparedness and Response Procedures must be provided in case of incident or the spillage of hazardous chemicals. Contractors and employees must be provided with the appropriate PPE for handling hazardous materials.	C	<p>Emergency response for spills and leaks is available for implementation in the event that an incident occurs. No incidents were noted for the Tank Farm during the audit period.</p> <p>The SDS is displayed and also stored in a file in the offices.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation SDS: <ul style="list-style-type: none"> Nitrate dated 27 August 2021; Ammonia Anhydrous dated 04 November 2020; 	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<ul style="list-style-type: none"> Substances Mixture dated 16 March 2020; Berusynth dated 29 May 2018; Siralox dated 11 December 2021; and Fuel gas dated 26 August 2020. 	
4.g	Employment must be undertaken in accordance with Sasol's employment policy and the labour and recruitment policy must be developed, displayed and implemented by the construction phase contractor	N/A	This condition is outside the audit period and refers to a requirement prior to commencement of the construction phase and was therefore not audited.	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 EMP for the GTL Catalyst Cobalt Manufacturing facility at Sasol One site in Sasolburg, dated June 2008.

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)
4.1.1 Soil, land Use and Land Capability								
	All operational activities are to be undertaken from the designated project building and materials storage areas.	C	The Auditor observed that all operational activities of the Cobalt Catalyst Manufacturing facility are undertaken from the designated project building and materials storage areas. <i>Evidence:</i> ■ Visual Site Observation	None.	N/A	N/A	N/A	N/A
	The necessary containment facilities, such as bunded areas must be well maintained in order to ensure integrity.	C	The Cobalt Catalyst Manufacturing facility bunds form part of the items that are inspected on a daily basis. The Auditor observed that the bunds were well maintained. <i>Evidence:</i>	None.	N/A	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"> Verbal Confirmation Visual Site Observation 					
	All incidents and spillages, such as mixing of liquid feedstock raw material, must be cleaned up, the area rehabilitated, and the incident closed out in accordance with the Emergency Response and Preparedness Procedure.	C	<p>All complaints and incident registers are kept on the SAP-EC system. The open incident or complaints tasks are managed by the area manager in liaison with the Sasol environmental department.</p> <p>No incidents or complaints were recorded for the Cobalt Catalyst Manufacturing facility during the audit period.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Incidents and complaints register Verbal Confirmation 	None.	N/A	N/A	N/A	N/A
	The closure and rehabilitation of this facility must be planned in advance of decommissioning and closure and be undertaken in accordance with the rehabilitation and closure plans for Sasol One Complex.	N/A	Noted. This condition is outside the audit period and refers to a requirement during the closure and decommissioning phase and not the operational phase, therefore it was not audited.	None.	N/A	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)
	Rehabilitation and closure planning must ensure the protection and rehabilitation of soil and land use resources both within the Sasol One Complex and the surrounding area.	N/A	Noted. This condition is outside the audit period and refers to a requirement during the closure phase and not the operational phase, therefore it was not audited.	None.	N/A	N/A	N/A	N/A
4.1.2 Flora and Fauna								
	The closure and rehabilitation of this facility must be planned in advance of decommissioning and closure and be undertaken in accordance with the rehabilitation and closure plans for Sasol One Complex.	N/A	Noted. This condition is outside the audit period and refers to a requirement during the closure phase and not the operational phase, therefore it was not audited.	None.	N/A	N/A	N/A	N/A
	Rehabilitation and closure planning must ensure the protection and rehabilitation of soil and land use resources both within the Sasol One Complex and the surrounding area.	N/A	Noted. This condition is outside the audit period and refers to a requirement during the closure phase and not the operational phase, therefore it was not audited.	None.	N/A	N/A	N/A	N/A
4.1.3 Surface Water								

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)
	All chemicals and other hazardous materials (the liquid feedstock material) are to be stored in individual, designated and bunded areas, where the bunded area is impermeable and is impervious to the stored substance. The bunded area must also be able to contain 110% volume of the largest container stored.	C	<p>The Auditor observed the facility was in an impermeable bunded area that was impervious to the stored substance and able to contain 110% volume of the largest container stored.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 	None.	N/A	N/A	N/A	N/A
	Material Safety Datasheets should be displayed for all chemicals and hazardous materials stored on site. This must take cognisance of the storage, handling, transportation and disposal of chemicals and hazardous materials.	C	<p>The SDS is displayed and also stored in a file in the offices.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation MSDS: <ul style="list-style-type: none"> Nitrate dated 27 August 2021; Ammonia Anhydrous dated 04 November 2020; Substances Mixture dated 16 March 2020; Berusynth dated 29 May 2018; Siralox dated 11 December 2021; and 	None.	N/A	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"> Fuel gas dated 26 August 2020. 					
	Emergency Preparedness and Response Procedures must be provided should an incident or the spillage of hazardous chemicals occur	C	<p>The emergency response to spills and leaks is available for implementation in the event incidents occurs. No incidents were noted for the Tank Farm during the audit period.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Incident and complaints register 	None.	N/A	N/A	N/A	N/A
	Storm water management measures must be applied to ensure that only clean storm water is routed via the Sasol One storm water system. Continue to monitor, record and evaluate water consumption	C	<p>The stormwater management at the facility is managed in accordance with the Sasol One Stormwater Management Plan. All water on site is considered 'dirty' water that is routed to Bioworks for reworking.</p> <p>The water volumes on site are monitored via the Digital Control System (DCS) in the control room.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> SWMP (SO-env-1192) dated December 2023 Water volume log sheet 	None.	N/A	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"> Verbal Confirmation 					
	Implement water saving practices through existing environmental management systems	C	<p>The water on the Sasol One site is managed in accordance with the WUL to ensure saving practices on site. Moreover, the environmental management system is integrated in the SAP EC which is a management intranet tool to ensure and capture proof of compliance with conditions of all licences and authorisations obtained.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation WUL (14/C22K/FG/4958) Internal WUL Audit Report (14/C22K/FG/4958) dated 10 January 2024 	None.	N/A	N/A	N/A	N/A
4.1.4 Groundwater								
	All liquid process chemicals (chemicals used in the manufacturing/ process at the plant) and other liquid hazardous material must be stored in designated, bunded areas, where bunded area is impermeable and is	C	The Auditor observed the liquid chemicals used for the manufacturing process is stored in designated and impermeable bunded area that was impervious to the stored substance and able to contain	None.	N/A	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)
	impervious to the stored substance. The bunded area must also be able to contain 110% volume of the largest container stored.		110% volume of the largest container stored. <i>Evidence:</i> <ul style="list-style-type: none"> Visual Site Observation 					
	Material Safety Datasheets should be displayed for all chemicals and hazardous materials stored on site. This must take cognisance of the storage, handling, transportation and disposal of chemicals and hazardous materials.	C	The SDS is displayed and also stored in a file in the offices. <i>Evidence:</i> <ul style="list-style-type: none"> Visual Site Observation SDS: <ul style="list-style-type: none"> Nitrate dated 27 August 2021; Ammonia Anhydrous dated 04 November 2020; Substances Mixture dated 16 March 2020; Berusynth dated 29 May 2018; Siralox dated 11 December 2021; and Fuel gas dated 26 August 2020. 	None.	N/A	N/A	N/A	N/A
	Ensure that any storage facilities are appropriately lined, maintained and do not seep.	C	The Auditor observed the facility was in an impermeable area that was impervious to the	None.	N/A	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)
			stored substances therefore, seepage cannot occur. <i>Evidence:</i> <ul style="list-style-type: none"> Visual Site Observation 					
	Emergency Preparedness and Response Procedures must be provided should an incident or the spillage of hazardous chemicals occur. Ensure that the proposed project buildings are fully contained, lined and located on an impervious substance / base.	C	The emergency response to spills and leaks is available for implementation in the event incidents occurs. No incidents were noted for the Tank Farm during the audit period. <i>Evidence:</i> <ul style="list-style-type: none"> Incident and complaints register 	None.	N/A	N/A	N/A	N/A
4.1.5 Effluent Generation								
	The effluent generation will be addressed through the treatment, re-cycling and re-use of effluent.	C	The generated effluent is routed to Bioworks for treatment, recycling and reuse of effluent. <i>Evidence:</i> <ul style="list-style-type: none"> IWWMP (SO-env-1192) dated December 2023 	None.	N/A	N/A	N/A	N/A
	All effluent handling is to be undertaken in accordance	C	All effluent is handled in accordance to the SOP for tank/	None.	N/A	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)
	with Standard Operating Procedures and the associated Material Safety Datasheet for the hazard material (where applicable). This needs to take cognisance of storage, handling, transportation and disposal of any effluent.		<p>cobalt catalyst manufacturing effluent - SCCM-PRD-40082. The SDS is displayed and also stored in a file in the offices.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> ■ Visual Site Observation ■ SOP for tank/ cobalt catalyst manufacturing effluent - SCCM-PRD-40082 ■ SDS: <ul style="list-style-type: none"> • Nitrate dated 27 August 2021; • Ammonia Anhydrous dated 04 November 2020; • Substances Mixture dated 16 March 2020; • Berusynth dated 29 May 2018; • Siralox dated 11 December 2021; and • Fuel gas dated 26 August 2020. 					
	Effluent handling and storage facilities must be appropriately lined and bunded to ensure that spillages are contained.	C	The Auditor observed the Tank Farm was in an impermeable bunded area that was impervious to the stored substance and able to contain	None.	N/A	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)
			<p>110% volume of the largest container stored.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 					
	Record keeping of the effluent handling, storage and transfer must be kept up-to-date and accurate.	C	<p>The Auditor reviewed effluent records during the site audit and noted that all effluent handling, storage and transfer records are up-to-date and accurate.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 	None.	N/A	N/A	N/A	N/A
	Emergency Preparedness and Response Procedures must be provided should an incident or the spillage of hazardous chemicals occur.	C	<p>The emergency response to spills and leaks is available for implementation in the event incidents occurs. No incidents were noted for the Tank Farm during the audit period.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Incident and complaints register Emergency Response Plan for Catalyst Manufacturing (ERP/CAT Revision 8) dated 17 August 2022 	None.	N/A	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)
4.1.6 Waste Management								
	General waste disposal bins will be made available for disposal of all general waste to contractors and employees	C	General waste disposal wheelie bins are made available across the facility. The waste is disposed in separate bins including general waste, steel waste and contaminated waste. <i>Evidence:</i> <ul style="list-style-type: none"> Visual Site Observation 	None.	N/A	N/A	N/A	N/A
	Waste will be temporarily stored on site (less than 90 days) before being disposed off appropriately at an approved waste disposal facility, or recycled where possible.	C	Waste is collected before the skips get overfilled and disposed by Averda or EnviroServ within less than 90 days. Waste catalyst is the only waste recovered and reused. <i>Evidence:</i> <ul style="list-style-type: none"> EnviroServ waste manifests Averda waste manifests EnviroServ Safe Disposal Certificates Waste register Verbal Confirmation 	None.	N/A	N/A	N/A	N/A
	Records of all waste being taken off site must be recorded and kept as	C	The waste management plan is in accordance with the Sasolburg Site Procedure. The	None.	N/A	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)
	evidence, and evidence of correct disposal must be kept.		<p>Auditor reviewed the waste manifests kept in the administration office.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Waste Manifests Procedure for the removal of waste from the SEO Sasolburg Sites (SS-S-014) dated 01 August 2022 					
	Hazardous materials generated during spillages must be cleaned up using absorbent material provided in spill kits on site.	C	<p>There were spill kits observed around the site during the audit in case of a spillage event. Sasol Operations manages hazardous spillages in accordance with their SOP for 'Removal of wastes from the Sasolburg Operations sites'.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> SOP for Removal of wastes from the Sasolburg Operations sites (SSP-S-014) dated 01 August 2022 Visual Site Observation 	None.	N/A	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)
	Absorbent materials used to clean up spillages should be disposed off in a separate hazardous waste bin.	C	The Auditor observed spill kits used to clean up spillages and contaminated/hazardous wheelie bins and skips to ensure separation of waste. <i>Evidence:</i> <ul style="list-style-type: none"> Visual Site Observation 	None.	N/A	N/A	N/A	N/A
	The storage area for hazardous material must be an area that takes cognisance of chemical compatibility.	C	The storage area is on an impermeable surface to ensure that there is no ground contamination of any chemicals on site. <i>Evidence:</i> <ul style="list-style-type: none"> Visual Site Observation 	None.	N/A	N/A	N/A	N/A
	The storage area should be covered, where required, labelled and well ventilated.	C	The Auditor observed the skips were covered and abide to the five requirements of the NEM:WA part 5 section 1 (storage, collection and transportation of waste). <i>Evidence:</i> <ul style="list-style-type: none"> Approval Letter for the Exemption Application: SO-env-613: Construction of tanks for Cobalt Catalyst 	None.	N/A	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)
			<p>Manufacturing facility Sasol 1 Complex dated 01 February 2021</p> <ul style="list-style-type: none"> Visual Site Observation 					
	All employees will be provided with the appropriate PPE for handling hazardous material.	C	<p>The Auditor reviewed the PPE register and confirmed that all Sasol personnel were provided with necessary PPE. The PPE issued by Sasol was able to handle hazardous materials. Sasol does not allow access to contractors and service providers to the plant unless they wear the required PPE to handle hazardous materials.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> PPE Register Onsite Observation Verbal confirmation 	None.	N/A	N/A	N/A	N/A
4.1.7 Air Quality								
	Air quality monitoring of the stacks at the Cobalt Catalyst plant as part of the Catalyst Manufacturing facility should be monitored according to the requirements as set out in the	C	<p>The Auditor was informed that air quality monitoring is conducted annually as set out in the National Environmental Management Air Quality Act although there no AEL for this facility.</p>	None.	N/A	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)
	National Environmental Management Air Quality Act.		<i>Evidence:</i> <ul style="list-style-type: none"> Skyside Test Report: Compliance Monitoring at Cobalt Catalyst Plant (SAL238 PF) dated 28 June 2024 					
4.1.8 Noise								
	A complaints register must be made available, and should any complaints be received, these should be logged in the complaints register and reported to the responsible person on site.	C	<p>All complaints and incident registers are kept on the SAP-EC system. The open incident or complaints tasks are managed by the area manager in liaison with the Sasol environmental department.</p> <p>No incidents or complaints were recorded for the Cobalt Catalyst Tank Farm during the audit period.</p> <i>Evidence:</i> <ul style="list-style-type: none"> Incidents and complaints register Verbal Confirmation 	None.	N/A	N/A	N/A	N/A
4.1.9 Spillages and Incidents								

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)
	All liquid chemicals and other liquid hazardous materials are to be stored in designated and bunded areas.	C	<p>The Auditor observed the Tank Farm was in an impermeable bunded area that was impervious to the stored substance and able to contain 110% volume of the largest container stored.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 	None.	N/A	N/A	N/A	N/A
	Material Safety Datasheets should be displayed for all chemicals and hazardous materials stored on site. This must take cognisance of the storage, handling, transportation and disposal of chemicals and hazardous materials.	C	<p>The SDS is displayed and also stored in a file in the offices.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation SDS: <ul style="list-style-type: none"> Nitrate dated 27 August 2021; Ammonia Anhydrous dated 04 November 2020; Substances Mixture dated 16 March 2020; Berusynth dated 29 May 2018; Siralox dated 11 December 2021; and Fuel gas dated 26 August 2020. 	None.	N/A	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)
4.2.3 Safety and Health Aspects								
	All employees must be provided with the appropriate PPE for handling of hazardous materials.	C	<p>The Auditor reviewed the PPE register and confirmed that all Sasol personnel were provided with necessary PPE. The PPE issued by Sasol was able to handle hazardous materials. Sasol does not allow access to contractors and service providers to the plant unless they wear the required PPE to handle hazardous materials.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> ■ PPE Register ■ Onsite Observation ■ Verbal confirmation 	None.	N/A	N/A	N/A	N/A

5 PROGRESS AGAINST PREVIOUS AUDIT FINDINGS

The previous compliance audit report against the consolidated EA and EMPr was compiled by the Northwest University CEM in 2019. A comparison in the change of compliance rating from the 2019 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.

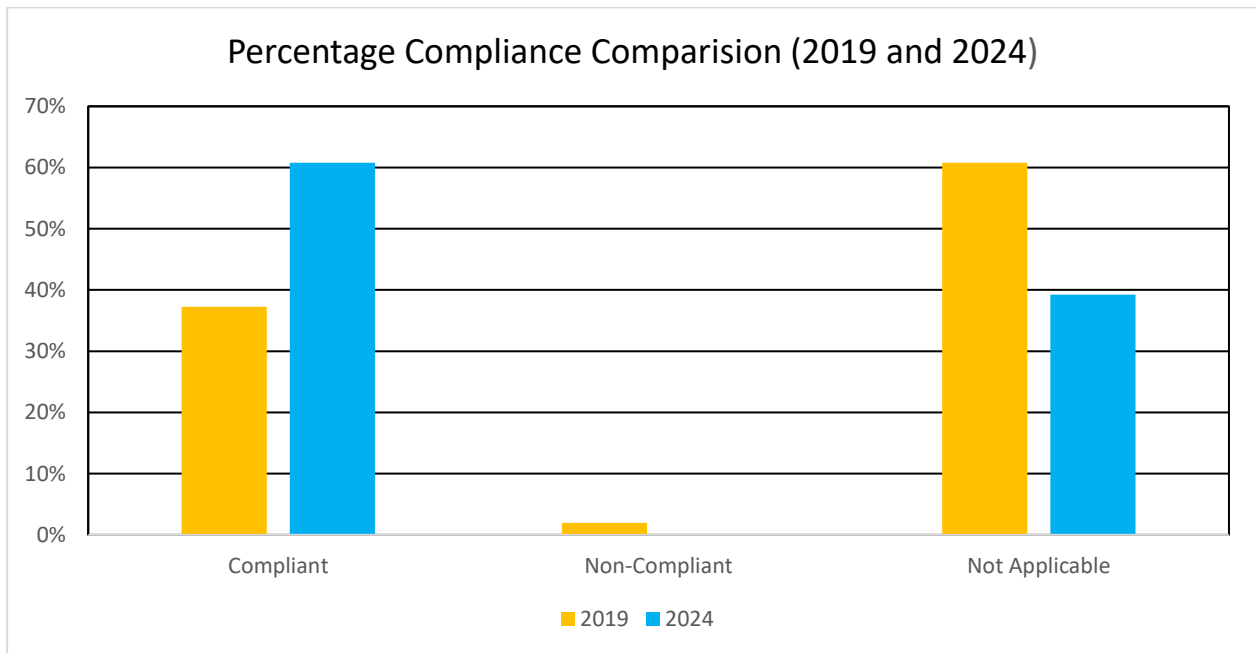


Figure 5-1 – Percentage comparison of Environmental Authorisation compliance levels from 2019 to 2024

Table 5-1 – Progress against previous findings

Ref	Commitment	2019 Status	2019 Finding	2024 Status	2024 Finding
EA Conditions					
3.1 Scope of Authorization					
3.1.2	The holder of the authorization shall be responsible for ensuring compliance with the conditions by any person acting on his or her behalf, including but not limited to, an agent, sub-contractor, employee or person rendering a	N/A	Noted.	C	Sasol as the holder of the authorisation acknowledges that responsibility for ensuring compliance with the EA and provides environmental management awareness training to staff, service providers, contractors and visitors to ensure that

Ref	Commitment	2019 Status	2019 Finding	2024 Status	2024 Finding
	service to the holder of the authorization.				everyone employed or acting on their behalf is aware that they need to comply with the EA and the EMP conditions. Induction training was provided to all staff, service providers, contractors and visitors.
3.1.3	The authorized activity may only be carried out at the property/site indicated above.	N/A	Noted.	C	The authorised activity is carried out at the Sasol One site Complex as within the EA location details.
3 Management of Activity					
3.2	The Department must be notified, within 30 days thereof, of any change of ownership and/or project developer. Conditions imposed in this EA must be made known to the new owner and/or developer and are binding on the new owner and/or developer.	C	The necessary amendments have been addressed via a formal process (see Application for amendment of an EA dated 2019/11/09). Also see Application for EA amendment Sasol cobalt manufacturing Ret EMS/1(E)/07/76 - SO-ENV-569.	N/A	The Auditor was informed that there was no change of ownership and/or project developer of the Cobalt Catalyst Manufacturing facility during the audit period.
5. Recording and Reporting					
	The environmental audit report must contain the following: <ul style="list-style-type: none"> Activity, Targets, Conformance/non-conformance, Performance indicator; and comments. 	NC	The submitted external audit report does not cover the specifications as prescribed in the EA 05. Recording and Reporting to the DSTEA 5.1.2.	C	This report meets the requirements stated in the EA.
7.2 Air Quality					
7.2.3	Air quality monitoring and modelling must be initiated for this facility to verify the emissions from the process at the start of commissioning.	C	Air quality impact assessment for the proposed Sasol GTL Catalyst Manufacturing Facility in Sasolburg Report No: APP/0B/SAS-01 Rev 0.0 date April 2008. See Air Dispersion modelling for the Sasol cobalt manufacturing plant, Sasolburg Operations	N/A	This condition is outside the audit period and refers to a requirement prior to commencement of the construction phase and was therefore not audited. However, an Air Dispersion Modelling was conducted pre-commissioning of the

Ref	Commitment	2019 Status	2019 Finding	2024 Status	2024 Finding
			20191108-AC-MVN-MEM dated 2019/11/08.		Cobalt Catalyst Manufacturing plant.
4. Findings					
4.d.	Water saving practices must be implemented and surface water and groundwater resources must be protected by ensuring that the proposed project buildings are fully contained, lined and located on an impervious based.	N/A	Noted	C	The water on the Sasol One site is managed in accordance with the WUL to ensure saving practices on site. Moreover, the environmental management system is integrated in the SAP EC which is a management intranet tool to ensure and capture proof of compliance with conditions of all licences and authorisations obtained.
4.e.	Storm water management measures must be applied ensure that only clean storm water is routed via the Sasol One storm water system.	N/A	Noted	C	The stormwater management at the Tank Farm is managed in accordance with the Sasol One Stormwater Management Plan. All water on site is considered 'dirty' water that is routed to Bioworks for reworking.
4.f.	Material Safety Datasheets must be displayed for all chemicals and hazardous materials stored on site and Emergency Preparedness and Response Procedures must be provided in case of incident or the spillage of hazardous chemicals. Contractors and employees must be provided with the appropriate PPE for handling hazardous materials.	N/A	Noted	C	Emergency response for spills and leaks is available for implementation in the event that an incident occurs. No incidents were noted for the Tank Farm during the audit period. The MSDS is displayed and also stored in a file in the offices.
EMPr Conditions					
4.1.4 Groundwater					
	All liquid process chemicals (chemicals used in the manufacturing/ process	NC	FNJM-002 - At the time of the audit it was observed that only liquid hazardous chemicals are stored within	C	The Auditor observed the liquid chemicals used for the manufacturing process is stored in designated and

Ref	Commitment	2019 Status	2019 Finding	2024 Status	2024 Finding
	at the plant) and other liquid hazardous material must be stored in designated, bunded areas, where bunded area is impermeable and is impervious to the stored substance. The bunded area must also be able to contain 110% volume of the largest container stored.		<p>the bunded areas. This is a non-compliance in due to the commitment that states all chemicals and other hazardous materials must be stored in bunded areas. It was noted during the audit that non liquid materials are stored in a warehouse with impermeable and impervious surface.</p> <p>It is recommended that the commitment/condition is amended.</p> <p>Take note that on 2019/02/01 the DESTEA instructed Sasol Operations to update the conditions in the EMPr for the Sasol Cobalt Catalyst Manufacturing (Pty) Ltd EMS/1(e)/07/76.</p>		impermeable bunded area that was impervious to the stored substance and able to contain 110% volume of the largest container stored.

6 SUMMARY OF THE AUDIT FINDINGS

6.1 SASOL SASOLBURG COBALT CATALYS MANUFACTURING FACILITY 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
Decision	1	0	0	1
Activities Authorised	1	1	0	0
Scope of Authorization	6	2	0	4
Appeal of Authorisation	3	0	0	3
Management of Activity	2	0	0	2
Monitoring	2	1	0	1
Recording and Reporting	3	3	0	0
Commissioning of the activity	1	0	0	1
Construction and Operation	19	16	0	3
Site closure and decommissioning	3	0	0	3
General	3	2	0	1
Findings	7	6	0	1
Total	51	31	0	20
Total Percentage		61%	0%	39%
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.

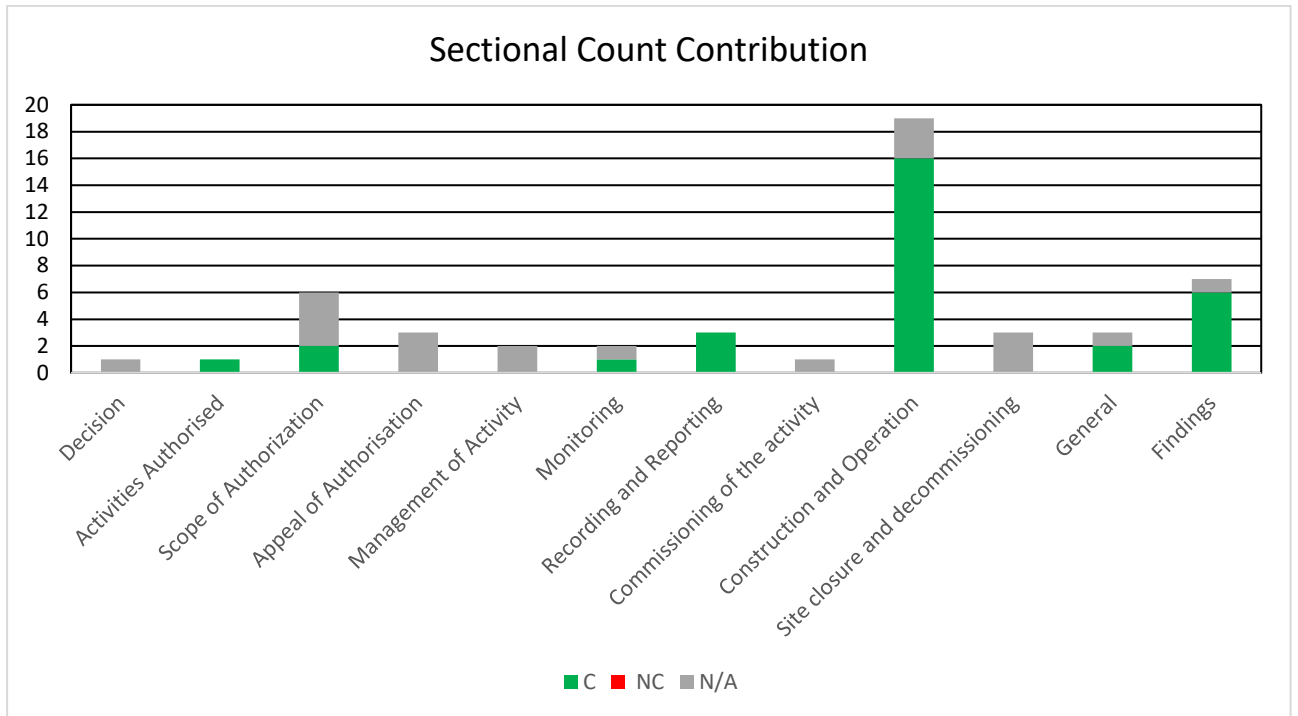


Figure 6-1 - Number/Count contribution of findings made to the EA conditions per section

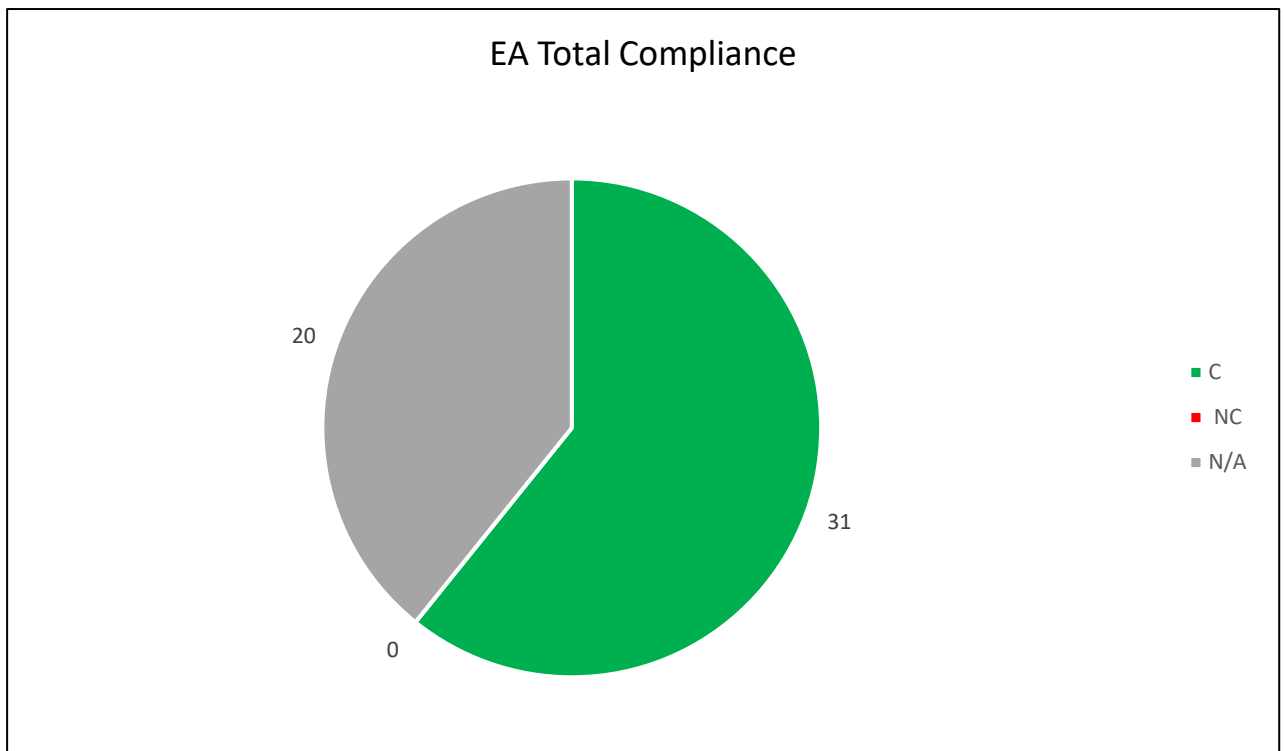


Figure 6-2 - Overall count findings on compliance to the EA commitments

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.

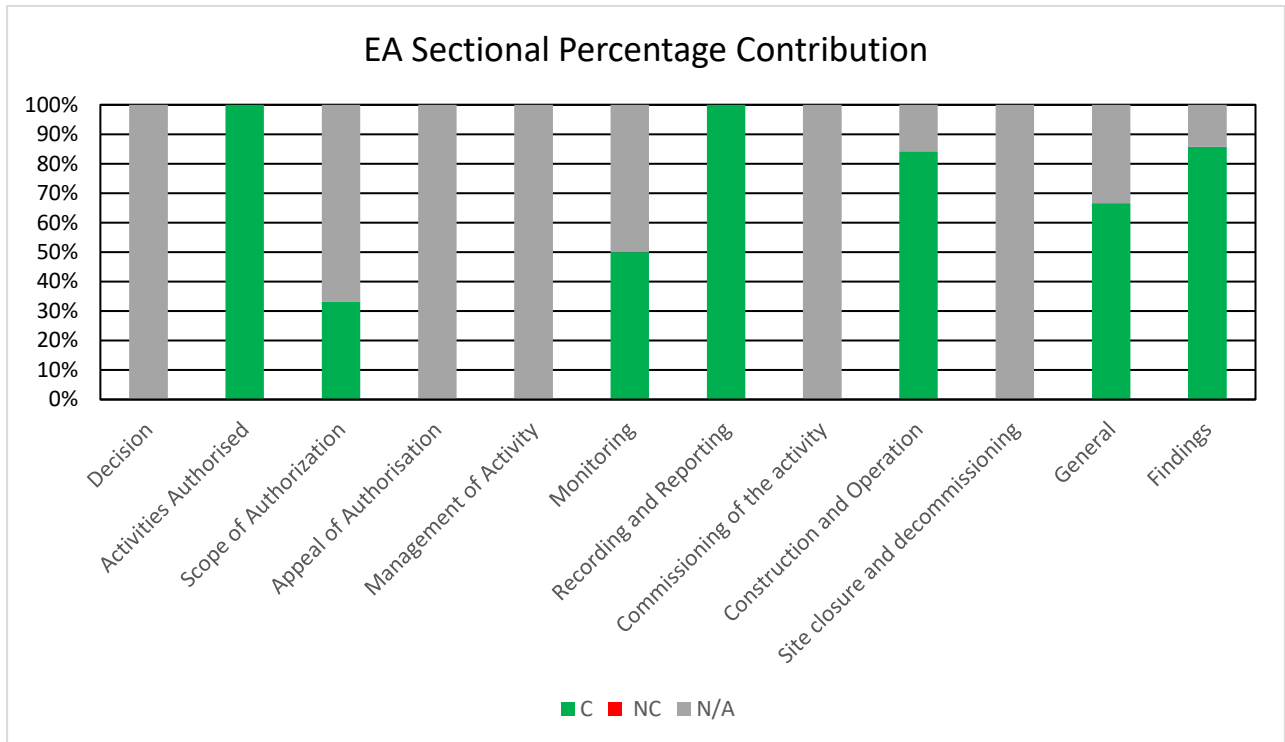


Figure 6-3 - Percentage contribution of findings made to the EA Commitments per Section

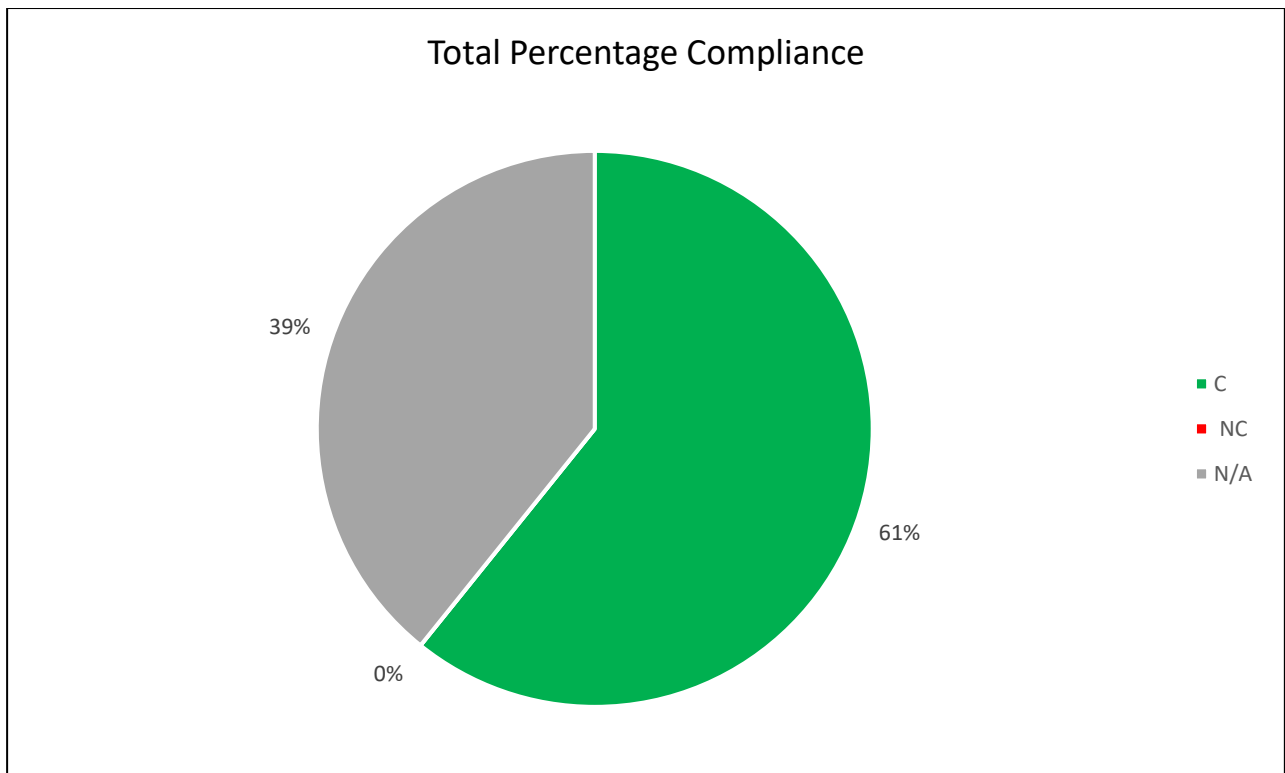


Figure 6-3 - Overall percentage findings on compliance to the EA Commitments

6.2 SASOL SASOLBURG COBALT CATALYS MANUFACTURING FACILITY 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
Soil, land Use and Land Capability	5	3	0	2
Flora and Fauna	2	0	0	2
Surface Water	5	5	0	0
Groundwater	4	4	0	0
Effluent Generation	5	5	0	0
Waste Management	8	8	0	0
Air Quality	1	1	0	0
Noise	1	1	0	0
Spillages and Incidents	2	2	0	0
Safety and Health Aspects	1	1	0	0
Total	34	30	0	4
Total Percentage		88%	0%	12%
Percentage Compliance with Applicable Conditions	100%			

Figure 6-4 presents the total proportion of compliance for the facility and **Figure 6-5** illustrates the number/count contribution of the findings of the EMPr per section.

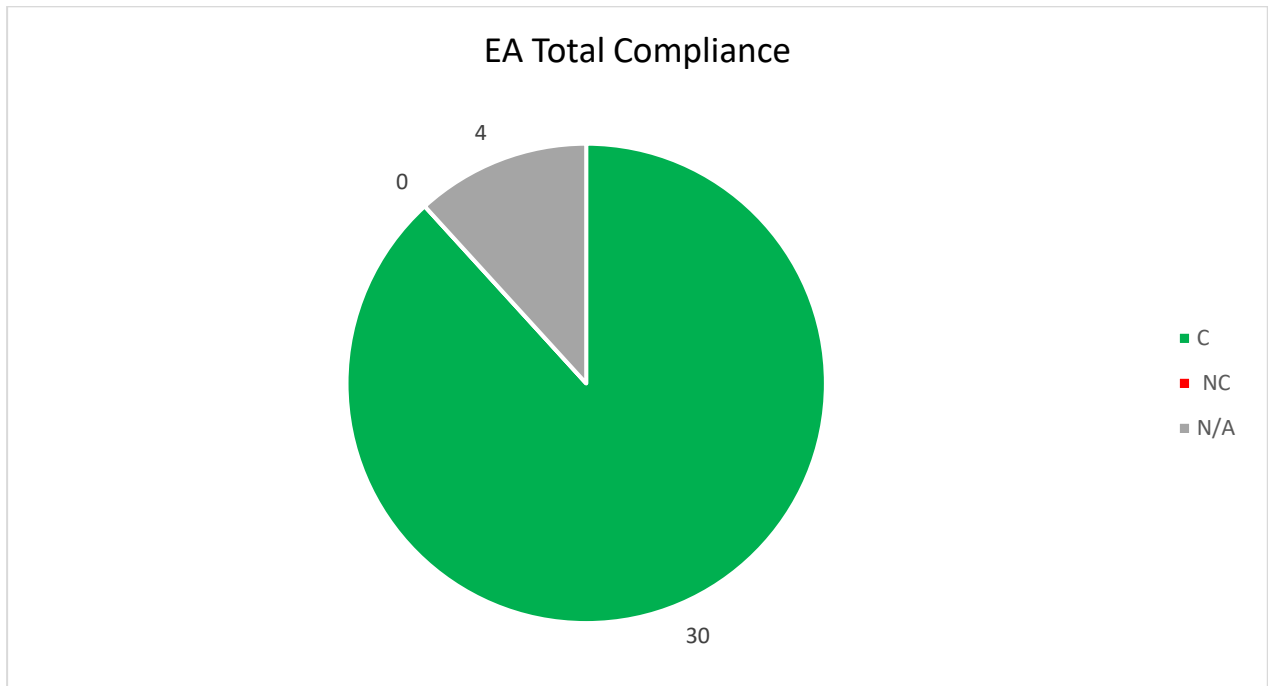


Figure 6-4 - Overall count findings on compliance to the EMPr Commitments

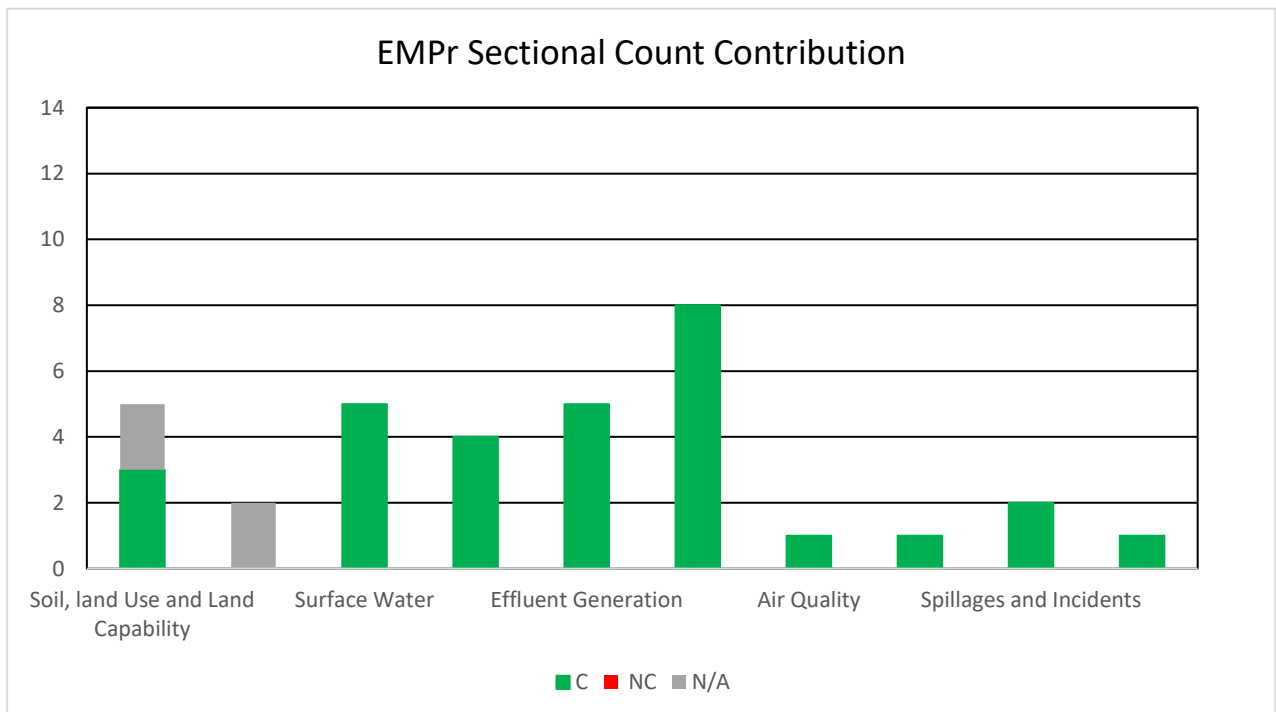


Figure 6-5 - Number/Count contribution of findings made to the EMPr Commitments per Section

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

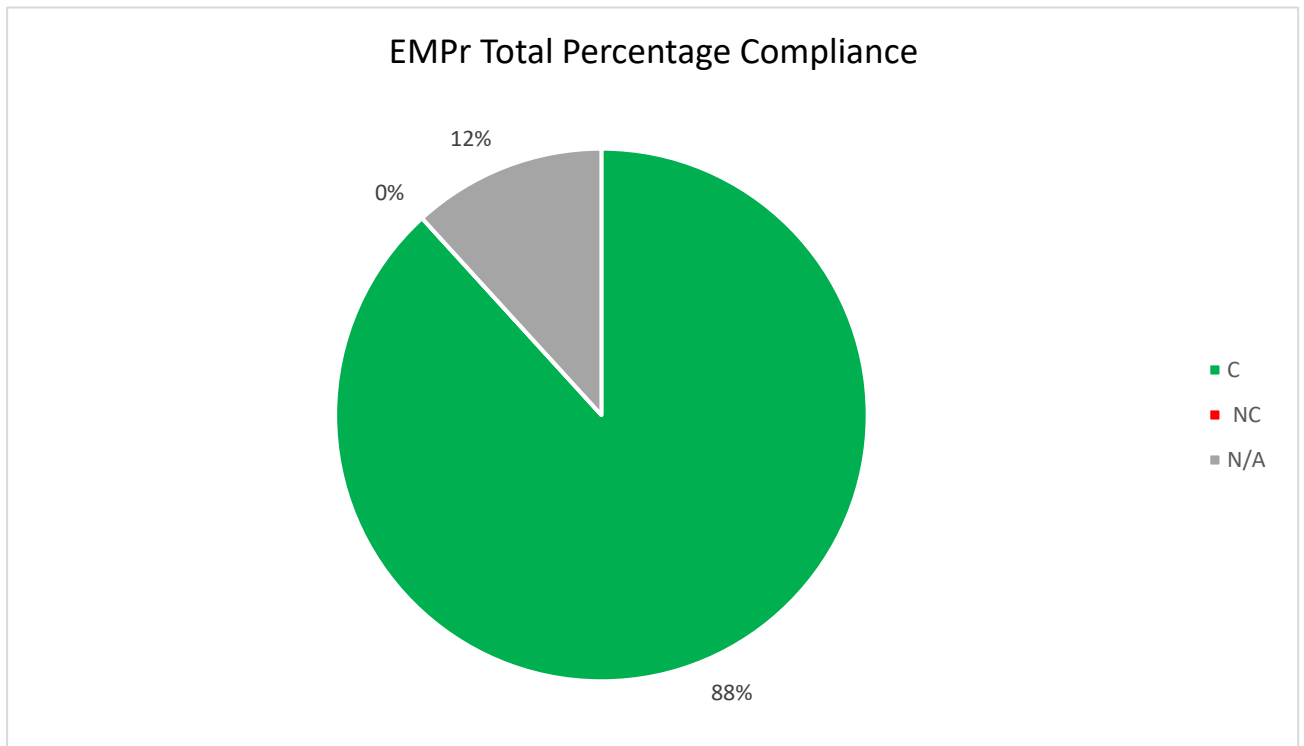


Figure 6-6 - Overall percentage findings on compliance to the EMPr Commitments

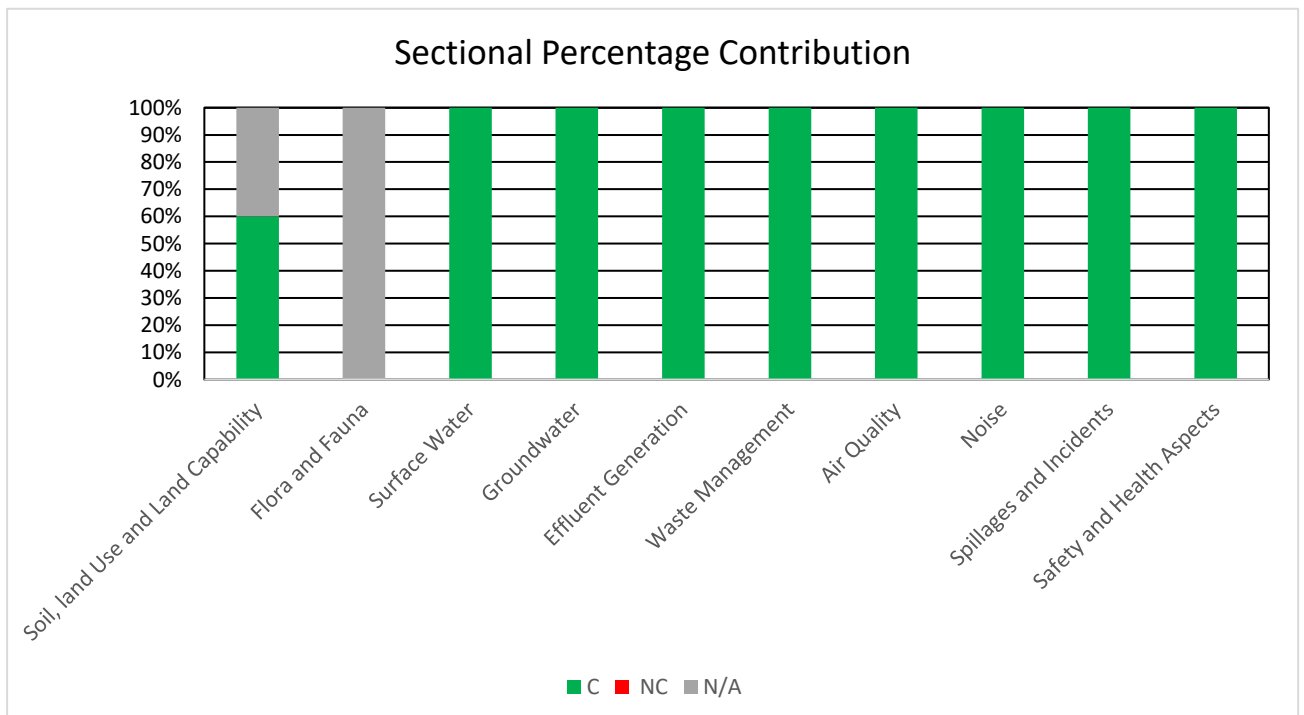


Figure 6-7 - Percentage contribution of findings made to the EMPr Commitments per Section

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 Cobalt Catalyst Manufacturing Facility 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 _____06 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 – Sasol Cobalt Catalyst Manufacturing

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	Impact Management Objective	Impact Management Action
1. Soil Land use and land Capability	Ensure sound environmental management regarding soil, land use and land capability during the operational phase of the project	1.1 All operational activities are to be undertaken from the designated project building and materials storage areas.
		1.2 The necessary containment facilities, such as bunded areas must be well maintained to ensure integrity.
		1.3 All incidents and spillages must be cleaned up, the area rehabilitated, and the incident closed out in accordance with the Emergency Response and Preparedness procedure.
2. Surface water	Ensure sound environmental management regarding surface water during the operational phase of the project	2.1 All liquid process chemicals (chemicals used in the manufacturing/ process at the plant) and other liquid hazardous material must be stored in designated, bunded areas, where bunded area is impermeable and is impervious to the stored substance. The bunded area must also be able to contain 110% volume of the largest container stored
		2.2 Safety Datasheets should be displayed for all chemicals and hazardous materials stored on site. This must take cognisance of the storage, handling, transportation and disposal of chemicals and hazardous materials.
		2.3 Emergency Preparedness and Response Procedures must be provided should an incident

		or the spillage of hazardous chemicals occur.
		2.4 Storm water management measures must be applied to ensure that only clean storm water is routed via the Sasol One storm water system. Continue to monitor record and evaluate water consumption.
		2.5 Implement water saving practices through existing environmental management systems.
3. Groundwater	Ensure sound environmental management regarding groundwater during the operational phase of the project	3.1 All liquid process chemicals (chemicals used in the manufacturing/ process at the plant) and other liquid hazardous material must be stored in designated, bunded areas, where bunded area is impermeable and is impervious to the stored substance. The bunded area must also be able to contain 110% volume of the largest container stored
		3.2 Material Safety Datasheets should be displayed for all chemicals and hazardous materials stored on site. This must take cognisance of the storage, handling, transportation and disposal of chemicals and hazardous materials.
		3.3 Ensure that any storage facilities are appropriately lined, maintained, and do not seep.
		3.4 Emergency Preparedness and Response Procedures must be provided should an incident or the spillage of hazardous chemicals occur.
4. Effluent generation	Ensure sound environmental management regarding effluent generation and management at	4.1 The effluent generation will be addressed through the treatment, re-cycling, and re-use of effluent.

	the facility during the operational phase	4.2	All effluent handling is to be undertaken in accordance with Standard Operating Procedures and the associated Safety Datasheet for the hazard material (where applicable). This needs to take cognisance of storage, handling, transportation, and disposal of any effluent.
		4.3	Effluent handling and storage facilities must be appropriately lined and bunded to ensure that spillages are contained.
		4.4	Record keeping of the effluent handling, storage and transfer must be kept up-to-date and accurate.
		4.5	Emergency Preparedness and Response Procedures must be provided should an incident or the spillage of hazardous chemicals occur.
5. Waste management	Ensure sound environmental management regarding air quality during all phases of the project	5.1	General waste disposal bins will be made available for disposal of all general waste to contractors and employees
		5.2	Records of all waste being taken off site must be recorded and kept as evidence, and evidence of correct disposal must be kept.
		5.3	Hazardous materials generated during spillages must be cleaned up using absorbent material provided in spill kits on site.
		5.4	Absorbent materials used to clean up spillages should be disposed of in a separate hazardous waste bin.
		5.5	The storage area for hazardous material must be an area that takes cognisance of chemical compatibility
		5.6	The storage area should be covered, where required, labelled, and well ventilated
		5.7	Waste will be temporarily stored on site before being

		disposed of appropriately at an approved waste disposal facility, or recycled where possible
6. Air Quality	Ensure sound environmental management regarding air quality during operational phase	6.1 Air quality monitoring of the stacks at the Cobalt Catalyst plant as part of the Catalyst Manufacturing facility should be monitored according to the requirements as set out in the National Environmental Management Air Quality Act
		6.2 Air quality monitoring and modelling must be initiated for this facility to verify the emissions from the process at the start of commission. Air quality monitoring and modelling must be continuous at the facility as part of Sasol air quality monitoring program.
7. Noise	Ensure Sound environmental management regarding noise levels during operation	7.1 A complaints register must be made available, and should any complaints be received, these should be logged in the complaints register and reported to the responsible person on site
8. spillages and incidents	Ensure sound environmental management regarding spillages and incidents should they occur during operational phase	8.1 All liquid chemicals and other liquid hazardous materials are to be stored in designated and bunded areas
		8.2 Safety Datasheets should be displayed for all chemicals and hazardous materials stored on site. This must take cognisance of the storage, handling, transportation and disposal of chemicals and hazardous materials