



Our reference: SO-ENV-1326

29 November 2024

Your Ref: EA nr EMB/07/08/247

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Attention: Deputy Director: Environmental Impact Assessment

## **ENVIRONMENTAL AUTHORISATION EXTERNAL REPORT SUBMISSION**

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

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

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

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

Attached, please find the compliance audit report for the Construction of above ground storage tanks at the cobalt catalyst facility, Environmental Authorisation with reference EMB/07/08/247, dated October 2024.

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The Report indicates compliance at large with 94% compliance noted. The non-compliance relates to changes in operational procedure impacting the management action and not the impact objective included in the EMPr.

#### Summary of non-compliance

Condition	Finding	Recommendation	Response
Should an incident or spillage take place, all surface run-offs from the Tank Farm must go to the Oily Water Sewage System (OWS) under controlled conditions.	<p>The Auditor was informed that any spillage from the Tank Farm is not routed to the OWS, however, it is reported as an incident and cleaned on site.</p> <p><i>Evidence:</i></p> <p>○ Verbal Confirmation</p>	<p>It is recommended that this condition is amended to reflect the current spill management practices on site.</p> <p><i>Timeframe:</i></p> <p>Medium term – 6 to 12 months</p>	<p>As per regulation 36, change in operational condition was noted to the auditor prior to the Audit commencing. This constitutes a change in the impact management action. Sasol assess the spill inside the containment bund and the spill can either be sent to effluent control via the OWS or sucked out by third party waste management company and disposed of responsible.</p>

The Audit report noted sufficient mitigation of environmental impacts and level of compliance to the Environmental Authorisation and Environmental Management Program (EMPr).

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.

Yours faithfully,

Signed by: Johann Van Wyk  
Signed at: 2024-12-03 07:32:09 +02:00  
Reason: I approve

*Johann Van Wyk*

**Johann van Wyk**  
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**Annexure A****Audit report.**

Construction of above ground storage tanks at Cobalt catalyst facility – Ref EMB/07/08/247



Sasol South Africa Ltd

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**CONSTRUCTION OF TANKS FOR COBALT  
CATALYST MANUFACTURING FACILITY (REF.  
NO: EMB/07/08/247) AND ENVIRONMENTAL  
MANAGEMENT PROGRAMME AUDIT**

Compliance Audit Report: November 2019 - July  
2024





Sasol South Africa Ltd

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# CONSTRUCTION OF TANKS FOR COBALT CATALYST MANUFACTURING FACILITY (REF. NO: EMB/07/08/247) AND ENVIRONMENTAL MANAGEMENT PROGRAMME AUDIT

Compliance Audit Report: November 2019 - July 2024

TYPE OF DOCUMENT (VERSION) CONFIDENTIAL

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DATE: OCTOBER 2024



Sasol South Africa Ltd

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# CONSTRUCTION OF TANKS FOR COBALT CATALYST MANUFACTURING FACILITY (REF. NO: EMB/07/08/247) AND ENVIRONMENTAL MANAGEMENT PROGRAMME AUDIT

Compliance Audit Report: November 2019 - July 2024

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# QUALITY CONTROL

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Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Remarks	Construction of the Tanks for Cobalt Catalyst Manufacturing Facility_Final Audit Report			
Date	October 2024			
Prepared by	Matilda Mbazo			
Signature				
Checked by	Anri Scheepers			
Signature				
Authorised by	Anri Scheepers			
Signature				
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### APPENDIX A

#### AUDITOR CVS

# 1 INTRODUCTION

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## 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 EMB/07/08/247) for the Construction of the Tanks for Cobalt Catalyst Manufacturing Facility and the associated Environmental Management Programme (EMPr), and to compile an audit report according to the requirements of the National Environmental Management Act (No. 107 of 1998), as amended (NEMA).

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

- EA for the Construction of the Tanks for Cobalt Catalyst Manufacturing Facility located at the Sasol One site in Sasolburg (reference number: EMB/07/08/247), dated 20 March 2009 by the Department of Tourism, Environmental and Economic Affairs (DTEEA), now the Department of Economic, Small Business Development, Tourism and Environmental Affairs (DESTEA);
- The first amendment of the EA for the Construction of the Tanks for Cobalt Catalyst Manufacturing Facility located at the Sasol One site in Sasolburg (reference number: EMB/07/08/247), dated 15 December 2014 by the DESTEA. The amendments include:
  - Change the applicant details on the EA;
    - Owner of the EA
    - Contact details and address
- The second amendment of the EA for the Construction of the Tanks for Cobalt Catalyst Manufacturing Facility located at the Sasol One site in Sasolburg (reference number: EMB/07/08/247), dated 03 December 2018 by the DESTEA. The amendments include:
  - Amendment of condition 8.2.1; 8.2.2; 8.2.3 and 8.3.2.
  - Corrected site coordinates; and
  - Change of the holder of the EA.
- The third amendment of the EA for the Construction of the Tanks for Cobalt Catalyst Manufacturing Facility located at the Sasol One site in Sasolburg (reference number: EMB/07/08/247), dated 09 November 2019 by the DESTEA. The amendments include:
  - Change the applicant details on the EA;
    - Contact Person and
    - Change of the holder of EA.
  - Amendment of condition 8.6.1 and paragraph f.

## 1.2 SASOL SASOLBURG – CONSTRUCTION OF TANKS ON ABOVE GROUND TANK FARM

The Tank Farm is located adjacent to the Cobalt Catalyst Manufacturing Facility 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.

The facility produces a proprietary cobalt-based catalyst for the Fischer Tropsch (FT) reactor in the GTL process. The plant is designed to produce 1 500 tonnes/annum cobalt catalyst. Liquid feedstock that is not available on site for the GTL Catalyst Manufacturing Facility are brought to site via trucks and pumped into the storage tanks from a common loading bay within the Tank Farm. Furthermore, the Catalyst Facility is required for the supply to the GTL production which Sasol has developed into a world leading technology.

The process is a nine-step batch procedure with impregnation of raw materials followed by roasting (calcining) with activation (reduction) and encapsulation with wax which is the last stages of the process. The three tanks consist of cobalt nitrate, fresh ethanol and spent ethanol. 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. Therefore, the fresh ethanol and spent ethanol tanks were empty during the audit period as they were originally part of the discontinued steps. 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.

**Table 1-1** indicates the various liquid feedstock raw materials which is stored in the Tank Farm, as well as their description, packaging, storage types, design volumes and routing of vapours.

**Table 1-1 – Raw materials stored at Tank Farm**

Raw Material	Description, Packaging, Storage	Design Volume of Tank (m3)	Routing of vapours
Ethanol	Organic solvent delivered in trucks; intermediate storage in tank on site; supply to the plant by dedicated pump.	90	Routed to thermal oxidation unit on site.
Spent Ethanol	Organic solvent stored on tank plot; pumped to truck by a dedicated valve; delivered from site by trucks	90	Routed to thermal oxidation unit on site
Tetra Ethyl Otho Silicate (TEOS)	Organic solvent delivered to site in 1m <sup>3</sup> Intermediate Bulk Containers (IBC's); intermediate storage in warehouse on site;	35	N/A

Raw Material	Description, Packaging, Storage	Design Volume of Tank (m3)	Routing of vapours
	delivered to the IBC's by forklift and pumped to plant by a dedicated pump.		
Metal Salt	Salt solution delivered by truck; intermediate storage in tank on site and supply to the plant by dedicated pump.	140	Nitrogen blanketed
Ammonia	Solution delivered to site by truck; intermediate storage in tank on site; supply to the plant by dedicated pump.	90	Scrubber available on site

Each of the storage tanks are individually banded except for the TEOS, which is stored in 1 m<sup>3</sup> Intermediate Bulk Containers. All the chemicals in the Tank Farm are handled separately and are not mixed together. The total storage volume for the feedstock material is 445 m<sup>3</sup> however, each of the storage tanks are designed with a safety volume and the combined capacity of all storage tanks will not exceed 1000 m<sup>3</sup>.

### 1.3 PROJECT TEAM

WSP auditors, Matilda Mbazo and Yvette Mmanasoe completed a site inspection of the Cobalt Catalyst Tank Farm at the Sasol One facility on **16 July 2024**.

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

The project team is summarised in **Table 1-2** and Curricula Vitae are included as **Appendix A**.

**Table 1-2 - Details of the Audit Team**

Audit Team	Role	Experience
Anri Scheepers	Review	BA (Hons) Geography
		15 Years' Experience
		Anri graduated from the University of Johannesburg with a BA honours in Geography in 2007 and has 15 years' work experience. Anri is qualified as a Lead Auditor and has undertaken legal compliance auditing, including environmental authorisations, waste management licences, water use licences and EMPs. In addition, she has undertaken general site assessments to determine compliance against local, provincial, and national environmental legislation
Matilda Mbazo	Auditor	BSc (Hons) Geography

Audit Team	Role	Experience
		<p>2 Years' Experience</p> <p>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.</p>
Yvette Mmanasoe	Auditor	BSc Environmental Geography
		<p>8 Years' Experience</p> <p>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.</p>

## 2 AUDIT SCOPE

WSP was appointed by Sasol to conduct the environmental compliance audit for the Cobalt Catalyst Tanks at the Sasol One site, 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 and associated amendments for the Cobalt Catalyst Tanks;
- Assess the level of compliance with the commitments of the EMPr that was submitted as part of the Scoping Report for the authorisation of the Cobalt Catalyst Tank Farm, as 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 Tank Farm was implemented;
- 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 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 2014 EIA Regulations (as amended) are considered applicable to the Cobalt Catalyst Tank Farm operations. Regulation 34 of the Regulations provides for the auditing of an environmental authorisation, EMPr and closure plan. Furthermore, **Appendix 7** of Government Notice Regulation (GNR) 982 of 2014 (as amended) outlines the required audit report content. The 2014 EIA Regulations, as amended, refer to a minimum audit frequency of five years. This audit was conducted to meet the requirements of Regulation 34 of the EIA Regulations, 2014 (as amended). **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.	<b>Sub-section 1.3</b> and CVs provided in <b>Appendix A</b>
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 <b>Section 4</b>

Sub-Section	Requirement	Report Section Reference
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	<b>Section 4</b>
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.	<b>Section 4</b>
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	<b>Section 4</b>
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.	<b>Sub-section 1.3</b> CVs provided in <b>Appendix A</b>
b	A declaration that the independent auditor is independent in a form as may be specified by the competent authority.	<b>Sub-section 9</b>
c	An indication of the scope of, and the purpose for which, the environmental audit report was prepared.	<b>Sub-section 1.1 and Section 2</b>
d	A description of the methodology adopted in preparing the environmental audit report.	<b>Section 3</b>
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	<b>Section 4</b>



Sub-Section	Requirement	Report Section Reference
	(iii) ensure compliance with the provisions of environmental authorisation, EMP, and where applicable, the closure plan.	
f	A description of any assumptions made, and any uncertainties or gaps in knowledge.	<b>Sub-sections 2.2</b>
g	A description of any consultation process that was undertaken during the course of carrying out the environmental audit report.	Not applicable.
j	A summary and copies of any comments that were received during any consultation process.	Not applicable.
k	Any other information requested by the competent authority.	Not applicable.

## 2.1 DISCLAIMER

This Report was prepared by WSP on behalf and at the request of Sasol in terms of Regulation 34 of the 2014 EIA Regulations, as amended.

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

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

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

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

## 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

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

#### 3.2 SITE INSPECTION AND INTERVIEWS

An onsite inspection was conducted on **16 July 2024** during which findings and observations were recorded, as detailed 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; and
- Don Hauman – Area Manager.

#### 3.3 INFORMATION CONSIDERED

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

- Amendments of the Environmental Authorisation (EMB/07/08/247);
- Environmental Authorisation (EMB/07/08/247) dated 20 March 2009
- 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.
- Acknowledgement for changes in production process (EM1/1(C)/00/132) dated 01 February 2019;
- Notification of Change of Contact Details of the Business Representative (Ref: SO-env-1285) dated 08 July 2024;
- The Proposed Tank Farm for the GTL Catalyst Manufacturing Facility: Environmental Management Plan, dated October 2008;
- External Audit of EAs/EMP: Construction of Tanks for Cobalt Catalyst Manufacturing Facility by Centre for Environmental Management (CEM) (Reference no: CEM 2019/077) dated November 2019;
- Approval Letter for the Exemption Application: SO-env-613: Construction of tanks for Cobalt Catalyst Manufacturing facility Sasol 1 Complex;
- Standard Operating Procedure for Removal of wastes from the Sasolburg Operations sites (SSP-S-014) dated 01 August 2022;
- Submission of Groundwater Monitoring Report (SO-env-1157) dated 20 June 2023;
- Groundwater Monitoring Report: WUL Compliance (41104135) dated June 2023;
- Waste Manifests;
- Safety Data Sheet;
- Induction Materials;
- 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 implementation of the mitigation measures in 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 1.2** was assessed.

**Table 3-1 Levels of Compliance**

Compliance Level	Definition
<b>Compliant (C)</b>	When an activity or commitment has been implemented, completed, is on-schedule or is maintained on an ongoing basis.  Condition/mitigation measure/commitment has been achieved with evidence provided in the form of a document or site verification.
<b>Non-compliant (NC)</b>	When an activity or commitment has not been complied with in its entirety/certain aspects thereof have not been addressed.  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:  — Short term: 0 – 6 months.

Compliance Level	Definition
	<ul style="list-style-type: none"> <li>— Medium term: 6 – 12 months.</li> <li>— Long term: 12 - 18 months</li> </ul>
Not applicable (N/A)	<p>The condition, commitment and/or mitigation measure is not applicable or is to be revised in accordance with current practice.</p> <p>A “Not Applicable” finding is also noted in event where such condition, commitment and/or mitigation measure is not yet relevant but is still relevant for future activities.</p>

## 4 AUDIT FINDINGS

### 4.1 ENVIRONMENTAL AUTHORISATION

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

**Table 4-1 - Environmental Authorisation (reference: EMB/07/08/247 dated 20 March 2009) and Amendments (reference: EMB/07/08/247 dated 15 December 2014, 03 December 2018 and 09 November 2019) Audit Findings**

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
<b>1. Decision</b>				
	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 detailed in <b>Section 1.1.</b>	None.
<b>2. Activities Authorised</b>				
	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 -	C	The Auditor was informed that the authorised activities for the Cobalt Catalyst Farm Tanks has not changed since the changes in production process in 2019 which Sasol notified the Department and received an acknowledgement letter dated 01 February 2019. The Auditor also	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	<p>Mr. Rightwell Laxa SVP Sasolburg Operations Sasol South Africa (Pty) Ltd acting through its Sasolburg Operations P.O. Box 1 SASOLBURG, 1947 TEL: +27 16 960 8001 To undertake the following activity - Installation/construction of an above ground Tank Farm, listed under Regulations Notice 386 activities number 07, described as: The above ground storage of dangerous goods, including petrol diesel, liquid petroleum gas or paraffin, in containers with a combined capacity of more than 30 cubic meters but less than 1 000 cubic meters at any one location or site." On the Sasol One site Complex Farm Infrachem 465, Sasolburg which falls within the jurisdiction of the District of Fezile Dabi, hereafter referred to as the "property/site: Site co-ordinates: 26° 49' 32.0" S ; 27° 50' 20.9" E</p>		<p>observed that the operating facility is located in Sasol One site in Sasolburg, Free State as per the approved coordinates in the EA.</p> <p>However, based on the site-wide notification dated 08 July 2024, the accountable person and the contact details was changed from "Mr. Rightwell Laxa", to the following:</p> <p>Ntokozo Gcabashe ntokozo.gcabashe@sasol.com 016 960 2007</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> <li>Google Earth</li> <li>Notification of Change of Contact Details of the Business Representative (Ref: SO-env-1285), dated 08 July 2024</li> <li>Acknowledgement for changes in production process (EM1/1(C)/00/132) dated 01 February 2019</li> </ul>	

### 3.1 Scope of Authorisation

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
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 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 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 is provided to all staff, service provides, contractors and visitors.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> <li>Induction Materials</li> <li>Online Training Matrix</li> </ul>	None.
3.1.3	The authorized activity may only be carried out at the property/site indicated above.	C	<p>It was confirmed during the site assessment that the authorised activity is carried out at the Sasol One Complex, Farm Infrachem 465, as detailed in the EA.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>EA location details (reference number EMB/07/08/247)</li> <li>Google Earth</li> </ul>	None.



Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	
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. It was confirmed during the audit that there has not been any deviation from the project description 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 falls outside the audit period and refers to a requirement prior to commencement and was therefore not audited. The EA was issued in 2009 and the activity commenced within specified time. The facility was operational during the current 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. The current audit did not include a legal review of compliance of the Cobalt Catalyst Tank Farm and whether Sasol complies with all statutory requirements and are in possession of all the necessary permits, authorisations or any other official documents.	None.
<b>3.2 Appeal of authorisation</b>				

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
3.2.1	The holder of the authorization must notify all registered interested and affected party, in writing and within 7 (seven) calendar days, of the Department's decision to authorize the activity. (Date of issue, date when EA is faxed).	N/A	Noted. This condition is outside the current audit period and refers to a requirement prior to commencement and was therefore not audited.	None.
3.1.3	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 current audit period and refers to a requirement prior to commencement and was therefore not audited.	None.
<b>4. Management of Activity</b>				
4.1	The provision of the Environmental management Plan (EMP) included in the Basic Assessment Report dated (19 January 2009) are an extension to the conditions of authorization and non-compliance with the conditions of the EMP would accordingly constitute non-compliance with the conditions of this authorization.	C	Sasol Operations implemented SAP Environmental Compliance (SAP EC) as an environmental management system tool to ensure and capture proof of compliance with conditions in the EA, EMP and other environmental authorisations.  <i>Evidence:</i> <ul style="list-style-type: none"> <li>The Proposed Tank Farm for the GTL Catalyst Manufacturing Facility: Environmental Management Plan, dated October 2008</li> </ul>	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<ul style="list-style-type: none"> <li>External Audit of EAs/EMP: Construction of Tanks for Cobalt Catalyst Manufacturing Facility by Centre for Environmental Management (CEM) (Reference no: CEM 2019/077) dated November 2019.</li> </ul>	
4.2	The EMP must be included in all contract documentation for the construction phase of the development.	N/A	Noted. This condition is outside the current audit period and refers to a requirement prior to commencement and was therefore not audited.	None.
4.3	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 .	N/A	The Auditor was informed that there was no change of ownership and/or project developer of the Cobalt Catalyst Tanks.	None.
<b>5. Monitoring</b>				
5.1	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	Records of compliance/non-compliance with conditions of this authorisation were kept in good condition and were readily available on the SAP-EC system, therefore, should be readily available upon the Departments request. No request was made by the Department during the current 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.	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<i>Evidence:</i> <ul style="list-style-type: none"> <li>Visual Site Observation</li> <li>External Audit of EAs/EMP: Construction of Tanks for Cobalt Catalyst Manufacturing Facility by Centre for Environmental Management (CEM) (Reference no: CEM 2019/077) dated November 2019</li> </ul>	
5.2	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.
<b>6. Recording and Reporting</b>				
6.1	The Department hereby confirms that an audit of compliance with procedures mentioned can be conducted at any time. Records of monitoring and/or auditing must be made available for inspection to any relevant authority inspecting the development.	C	Noted. The Auditor confirms that all monitoring records are readily available on site and on the SAP-EC system.  <i>Evidence:</i> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
6.2	This environmental audit report must be compiled by an independent auditor .	C	The current audit report was compiled by WSP Group Africa, an independent auditor, as stated in <b>Section 1.1.</b>	None.
<b>Commissioning of Activity</b>				
7.1	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 current audit period and refers to a requirement prior to commencement of the construction phase and was therefore not audited.	None.
<b>8. Construction &amp; Operation</b>				
<b>8.1 Soil, land use and land capacity</b>				
8.1.1	All construction activities must be taken from the designated contractor laydown area and materials storage areas.	N/A	This condition is outside the current audit period and refers to a requirement prior to commencement of the construction phase and was therefore not audited.	None.
8.1.2	The contractor laydown area must be hardstanding in the form of compacted gravel and ensure pollution prevention measures are implemented, such as bunded storage areas for hazardous chemical and materials.	N/A	This condition is outside the current audit period and refers to a requirement prior to commencement of the construction phase and was therefore not audited.	None.
8.1.3	All incidents and spillages, such as mixing of liquid feedstock raw material, must be cleaned up.	N/A	This condition is outside the current 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
8.1.4	Industrial waste skips must be correctly labelled, covered and placed with the correct signage.	C	<p>As part of the external audit submission dated 29 November 2019, the condition was amended to state that "Sasolburg Operations' waste management procedure, SSP-S-014 was updated and requires waste signage and coverage of waste skips <b>where required</b> in line with NEM:WA part 5 section 21 regarding general requirements for the storage of waste."</p> <p>The amendment was approved on the 01 February 2021.</p> <p>The Auditor observed the skips were covered and abide to the requirements of the NEM:WA part 5 section 1 regarding storage, collection and transportation of waste.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Approval Letter for the Exemption Application: SO-env-613: Construction of Tanks for Cobalt Catalyst Manufacturing facility Sasol 1 Complex dated 01 February 2021.</li> <li>Visual Site Observation</li> </ul>	None.
8.1.5	Storage of hazardous and general waste must be compliant to the NEM:WA requirements, waste must be managed in such a manner that it does not endanger health or the environment or cause nuisance through noise, odour or visual impacts"	C	<p>Sasol One Site and Sasol Operations at large manages waste as per their standard operating waste procedure (SS-S-014) required by NEM:WA, along with the associated waste regulations, and the applicable norms and standards, as well as duty of care.</p> <p><i>Evidence:</i></p>	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<ul style="list-style-type: none"> <li>IWWMP (SO-env-1192) dated December 2023</li> <li>Procedure for the removal of waste from the SEO Sasolburg Sites (SSP-S-014) dated 01 August 2022</li> <li>Visual Site Observation</li> </ul>	
8.1.6	Should an incident or spillage take place, all surface run-offs from the Tank Farm must go to the Oily Water Sewage System (OWS) under controlled conditions.	NC	<p>The Auditor was informed that any spillage from the Tank Farm is not routed to the OWS, however, it is reported as an incident and cleaned on site.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> </ul>	<p>It is recommended that this condition is amended to reflect the current spill management practices on site.</p> <p><i>Timeframe:</i></p> <ul style="list-style-type: none"> <li>Medium term – 6 to 12 months</li> </ul>
<b>8.2 Effluent generation</b>				
8.2.1	Effluent from the facility must tie into the existing Sasol One effluent management system.	N/A	Noted. No effluent is produced from the storage tanks therefore, this condition is not auditable.	None.
8.2.2	Emergency Preparedness and Response Procedures must be provided should an incident or the spillage of hazardous chemicals occur, incorporated into the Sasol one site wide EPRP	C	<p>Environmental incidents such as spills and leaks at the Tank Farm are handled in accordance with the site wide SOP (The reporting, investigation and recording of environmental incidents (SSP-S-O13) and the Works Emergency Action Plan (SS-S-041)) . No incidents were noted for the Tank Farm during the audit period.</p> <p><i>Evidence:</i></p>	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<ul style="list-style-type: none"> <li>Incident and complaints registerThe reporting, investigation and recording of environmental incidents (SSP-S-013) dated 25 July 2019</li> <li>Works Emergency Action Plan (SSP-S-041)</li> </ul>	
8.2.3	All process chemicals and other hazardous materials that may pose a risk to human health or the environment (as reflected by the MSDS) must be stored in a designated area, 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 bunded, able to contain 110% volume of the largest volume stored and is impervious to the stored substance. The platinum is a valuable reactive metal that is stored in a high security vault.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> <li>SDS: <ul style="list-style-type: none"> <li>Nitrate dated 27 August 2021;</li> <li>Ammonia Anhydrous dated 04 November 2020;</li> <li>Substances Mixture dated 16 March 2020;</li> <li>Berusrhyn dated 29 May 2018;</li> <li>Siralox dated 11 December 2021; and</li> <li>Fuel gas dated 26 August 2020.</li> </ul> </li> </ul>	None.
<b>8.3 Spillages &amp; Incident</b>				
8.3.1	Regular inspections of the above ground storage Tank Farm must be undertaken.	C	<p>The Auditor was informed that inspections of the Tank Farm are conducted on a daily basis.</p> <p><i>Evidence:</i></p>	None.



Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<ul style="list-style-type: none"> <li>Verbal Confirmation</li> </ul>	
8.3.2	The necessary containment facilities, such as all the individual bunded areas are maintained in order to ensure integrity"	C	<p>The Cobalt Catalyst tank bunds form part of the planned maintenance system and are inspected on a daily basis. The Auditor observed that the bunds were well maintained. It was observed that the bunds contain coal dust from the overhead conveyor belt that runs across the Tank Farm from another plant. The coal dust is regularly swept and returned to the plant.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> <li>Visual Site Observation</li> </ul>	None.
8.3.3	Emergency Preparedness and Response Procedures must be provided should an incident or the spillage of hazardous chemicals	C	<p>Any environmental incidents such as spills and leaks at the Tank Farm are handled in accordance to the site wide SOP (The reporting, investigation and recording of environmental incidents (SSP-S-013) and the Works Emergency Action Plan (SS-S-041)) 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"> <li>Incident and complaints register;The reporting, investigation and recording of environmental incidents (SSP-S-013) dated 25 July 2019</li> </ul>	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<ul style="list-style-type: none"> <li>Works Emergency Action Plan (SSP-S-041)</li> </ul>	
8.3.4	All materials within the Tank Farm are to be stored in individual. Designated and bunded areas, where the bunded areas 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 that the Tank Farm was in an 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"> <li>Visual Site Observation</li> </ul>	None.
<b>8.4 Surface &amp; groundwater pollution</b>				
8.4.1	All construction activities must be taken from the designated contractor laydown area, which is clearly demarcated in the Sasol One footprint.	N/A	This condition is outside the current audit period and refers to a requirement prior to commencement of the construction phase and was therefore not audited.	None.
8.4.2	The contractor laydown area must allow for surface water run-off to flow directly to the OWS under controlled conditions, to ensure no potential contamination of surface- and groundwater. This includes all incidents and spillages that may take place from the Tank Farm.	N/A	This condition is outside the current audit period and refers to a requirement prior to commencement of the construction phase and was therefore not audited.	None.
8.4.3	Stormwater management measures must be applied to ensure that only clean stormwater routed via the Sasol One stormwater system.	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 to be treated for reuse	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<i>Evidence:</i> <ul style="list-style-type: none"> <li>SWMP (SO-env-1192) dated December 2023</li> <li>Verbal Confirmation</li> </ul>	
8.4.4	Ensure that the proposed project buildings are fully contained, lined and located on an impervious substance/base.	C	<p>The Auditor observed that project buildings consisting of offices and the control room is located on an impervious base.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	None.
<b>8.5 Waste Management</b>				
8.5.1	General waste disposal bin will be made available for disposal of all general waste to contractors and employees	C	<p>General waste bins are available across the Tank Farm facility. The waste is disposed in separate bins provided for general waste, steel waste and contaminated waste.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	None.
8.5.2	General waste bins will be correctly labelled	C	<p>General waste bins are available across the Tank Farm facility. The waste is disposed in separate colour coded wheelie bins labelled general waste, steel waste and contaminated waste.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
8.5.3	Waste will be temporarily stored on site (less than 90 days) before being disposed of appropriately at an approved waste disposal facility, or recycled where possible	C	<p>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.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>■ EnviroServ waste manifests</li> <li>■ Averda waste manifests</li> <li>■ EnviroServ Safe Disposal Certificates</li> <li>■ Waste register</li> <li>■ Verbal Confirmation</li> </ul>	None.
8.5.4	Hazardous materials will be generated if there are spillages. This waste will be cleaned up using absorbent material provided in spill kits on site and disposed of at hazardous chemical waste disposal site	C	<p>It was observed during the site assessment that spill kits are available around the site 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"> <li>■ SOP for Removal of wastes from the Sasolburg Operations sites (SSP-S-014) dated 01 August 2022</li> <li>■ Visual Site Observation</li> </ul>	None.
8.5.5	The storage area will be covered, where required labelled and well ventilated	C	As part of the external audit submission dated 29 November 2019, the condition was amended to state that "Sasolburg Operations' waste management procedure, SSP-S-014 was updated	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<p>and requires waste signage and coverage of waste skips where required in line with NEM:WA part 5 section 21 regarding general requirements for the storage of waste.”</p> <p>The amendment was approved on the 01 February 2021.</p> <p>The Auditor observed the skips were covered and abide to the requirements of the NEM:WA part 5 section 1 regarding general storage, collection and transportation of waste.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Approval Letter for the Exemption Application: SO-env-613: Construction of Tanks for Cobalt Catalyst Manufacturing facility Sasol 1 Complex dated 01 February 2021.</li> <li>Visual Site Observation</li> </ul>	
<b>8.6 Health &amp; Safety</b>				
8.6.1	All employees must be provided with the appropriate PPE for the activities they are required to undertake. contractors should provide their own PPE, unless by agreement with Sasol South Africa Limited"	N/A	Noted. The Auditor was informed that the DESTEA has no mandate over occupational health and safety conditions. Therefore, this condition was not audited.	None.
8.6.2	8.6.2 Appropriate health and safety training awareness must be provided.	N/A	Noted. The Auditor was informed that the DESTEA has no mandate over occupational health and	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			safety conditions. Therefore, this condition was not audited.	
<b>8.7 Closure and decommissioning</b>				
8.7.1	Rehabilitation Phase A rehabilitation plan must be compiled and should form part of the Environmental Management Plan for approval by this Department.	N/A	This condition is outside the current audit period and refers to a requirement of the closure and decommissioning phase and was therefore not audited.	None.
<b>9. General</b>				
9.1	A copy of this authorization must be kept at the property where the activity will be carried on. The 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.	C	The auditor observed that a copy of the authorisation was in place at the control room office and on the Sasol SAP-EC.  <i>Evidence:</i> ■ Onsite Observation	None.
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	According to the site-wide Department notification dated July 8, 2024, the Department has been informed of a change in the applicant's contact person. This does not involve a change of ownership. Changes in the details are provided below:  Ntokozo Gcabashe ntokozo.gcabashe@sasol.com	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			016 960 2007 <i>Evidence:</i> <ul style="list-style-type: none"> <li>Notification of Change of Contact Details of the Business Representative (Ref: SO-env-1285) dated 08 July 2024.</li> </ul>	
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.
<b>3.Findings</b>				
a)	All waste must be managed as stated in Section 8.5 of this document.	N/A	Noted. Refer to <b>Section 8.5</b> .	None.
b)	The OWS must be continuously monitored and maintained in order to ensure optimum performance	N/A	Noted.	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
c)	All construction activities must be undertaken from designated contractor laydown area, which is clearly demarcated in the Sasol One footprint	N/A	This condition is outside the current audit period and refers to a requirement prior to commencement of the construction phase and was therefore not audited.	None.
d)	Surface and groundwater must be managed as stated in Section 8.4 of this document.	N/A	Noted. Refer to <b>Section 8.4</b> .	None.
e)	Storm water must be managed as stated in Section 8.4 of this document.	N/A	Noted. Refer to <b>Section 8.4</b> .	None.
f)	Two boreholes designed for monitoring must be constructed up and down gradient of the site based on the geology of the area. Equally important, the boreholes must be monitored bi-annually and results of the groundwater monitoring samples must be forwarded to DWS, as DWS recommended.	C	<p>The Auditor observed two boreholes (up-gradient (A05-22S) and down-gradient (A7A) of the FT3 plant . These boreholes are monitored on a bi-annual basis and the results are submitted to the Department of Water and Sanitation (DWS). Although the EA does not stipulate compliance parameters for the two boreholes, these boreholes do meet all the historical WUL compliance parameters.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> <li>Submission of Groundwater Monitoring Report (SO-env-1157) dated 20 June 2023</li> <li>Groundwater Monitoring Report: WUL Compliance (41104135) dated June 2023</li> </ul>	None.





Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
g)	DWAF recommendations must be implemented and exercised.	N/A	Noted. The Holder of the Authorisation noted this condition.	None.



## 4.2 ENVIRONMENTAL MANAGEMENT PROGRAMME

**Table 4-2** below provides the level compliance with the conditions within the EMPr for the Cobalt Catalyst Tanks at Sasol One site in Sasolburg, dated October 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 EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
<b>4.1.1 Soil, Land Use and Land Capability</b>								
	All operational activities are to be undertaken from the designated project building and materials storage areas.	<b>C</b>	<p>The auditor observed that all operational activities associated with the Cobalt Catalyst Tanks are undertaken from the designated project building and materials storage areas.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"><li>Visual Site Observation</li></ul>	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)
	The necessary containment facilities, such as bunded areas must be well maintained in order to ensure integrity.	C	<p>The Cobalt Catalyst tanks bunds form part of the operational areas that are visually inspected on a daily basis. The auditor observed that the bunds were well maintained.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> <li>Visual Site Observation</li> </ul>	None.	N/A	N/A	N/A	N/A
	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.	C	<p>The Tank Farm is regularly inspected for leaks and when damage to the tank or the bund wall is noted, it is recorded and scheduled for maintenance.</p> <p>Any environmental incidents such as spills and leaks at the Tank Farm are handled in accordance with the site</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)
			<p>wide SOP ( The reporting, investigation and recording of environmental incidents (SSP-S-O13) and the Works Emergency Action Plan (SS-S-041)) in the event incidents occurs. No incidents were noted for the Tank Farm during the current audit period.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Incident and complaints register;</li> <li>The reporting, investigation and recording of environmental incidents (SSP-S-013) dated 25 July 2019</li> </ul> <p>Works Emergency Action Plan (SSP-S-041)</p>					

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)
1.4	Industrial waste skips must be correctly labelled, covered, where required, and placed with the correct signage.	C	<p>As part of the external audit submission dated 29 November 2019, the condition was amended to state that "Sasolburg Operations' waste management procedure, SSP-S-014 was updated and requires waste signage and coverage of waste skips where required in line with NEM:WA part 5 section 21 regarding general requirements for the storage of waste." The amendment was approved on the 01 February 2021.</p> <p>The Auditor observed the skips were covered and abide to the requirements of the NEM:WA part 5 section 1 regarding general</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)
			<p>storage, collection and transportation of waste.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Approval Letter for the Exemption Application: SO-env-613: Construction of Tanks for Cobalt Catalyst Manufacturing facility Sasol 1 Complex dated 01 February 2021.</li> <li>Visual Site Observation</li> </ul>					
1.5	The storage area for industrial waste/material must be within a designated and bunded area, 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 that the Tank Farm is in an impermeable bunded area that is impervious to the stored substance and able to contain 110% volume of the largest container stored.</p> <p><i>Evidence:</i></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)
			<ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>					
	Industrial waste must be collected and disposed of at an appropriate waste disposal facility	C	<p>Waste such as pallets, siralox bags and platinum containers are collected at the Hub to 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"> <li>EnviroServ and Averda Waste Manifests</li> <li>EnviroServ Safe Disposal Certificate (SP-24002101) dated 15/08/2023 and 27/05/2024</li> <li>Verbal Confirmation</li> </ul>	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)
	Records of all waste being taken off site must be recorded and kept as evidence	C	<p>It was observed during the site assessment that records of waste removed from site is recorded and kept as evidence. The Auditor reviewed the waste manifests kept in the administration office.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>■ EnviroServ and Averda Waste Manifests</li> <li>■ EnviroServ Safe Disposal Certificate (SP-24002101) dated 15/08/2023 and 27/05/2024</li> <li>■ Procedure for the removal of waste from the SEO Sasolburg Sites (SS-S-014) dated 01 August 2022</li> </ul>	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)
	Should an incident or spillage take place, all surface run-off from the tank Farm must go to the OWS under controlled conditions	NC	<p>The Auditor was informed that any spillages from the Tank Farm is not routed to the OWS. However, it is reported as an incident and cleaned on site.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> </ul>	<p>It is recommended that this condition is amended to reflect the operations on site.</p> <p><i>Timeframe:</i></p> <ul style="list-style-type: none"> <li>Medium term – 6 to 12 months</li> </ul>	N/A	This condition is practical to the Cobalt Tank Farms.	The non-compliance will have an environmental impact in the event of incident or spillage.	N/A
	The OWS must be continuously monitored and maintained in order to ensure optimum performance	C	<p>The Auditor was informed that the OWS monitored on a daily basis and maintenance is in accordance with the Sasol One planned maintenance schedule.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> </ul>	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)
	An OWS maintenance procedure must be implemented	C	<p>The OWS is operated and maintained in accordance with the Management of Water and Waste procedure (SSP-S-030) and the Tank / Cobalt Catalyst Manufacturing Effluent procedure (SCCM-PRD-40082).</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>■ SOP for the Tank/ Cobalt Catalyst Manufacturing Effluent (SCCM-PRD-40082)</li> <li>■ SOP for Management of Water and Waste on the Sasol One and Midlands site</li> </ul>	None.	N/A	N/A	N/A	N/A
	A Material Safety Datasheet (MSDS) should be displayed for all chemicals and hazardous materials (all the	C	The MSDS is displayed and available in a file in the offices adjacent to the Tank Farm.	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)
	liquid feedstock material). This must take cognizance of the storage, handling, transportation and disposal of these chemicals and hazardous materials.		<i>Evidence:</i> <ul style="list-style-type: none"> <li>Visual Site Observation</li> <li>MSDS: <ul style="list-style-type: none"> <li>Nitrate dated 27 August 2021;</li> <li>Ammonia Anhydrous dated 04 November 2020;</li> <li>Substances Mixture dated 16 March 2020;</li> <li>Berusynth dated 29 May 2018;</li> <li>Siralox dated 11 December 2021; and</li> <li>Fuel gas dated 26 August 2020.</li> </ul> </li> </ul>					
	The closure and rehabilitation of this facility must be planned in advance of decommissioning and closure	N/A	Noted. This condition is outside the current audit period and refers to a requirement during 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)
	and be undertaken in accordance with the rehabilitation and closure plans of the Sasol One Complex.		closure phase and not the operational phase, therefore it was not audited.					
	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 current 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
<b>4.1.2 Effluent Generation</b>								
	The effluent generation will be addressed through the treatment, re-cycling and re-use of effluent.	N/A	No effluent is produced from the storage tanks; therefore, this condition is not auditable.	None.	N/A	N/A	N/A	N/A
	All effluent handling is to be undertaken in accordance with Standard Operating Procedures and the associated MSDS for the	N/A	No effluent is produced from the storage tanks; therefore, this condition is not auditable.	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)
	hazard material (where applicable). This needs to take cognisance of storage, handling, transportation and disposal of any effluent.							
	Effluent handling and storage facilities must be appropriately lined and bunded to ensure that spillages are contained.	N/A	No effluent is produced from the storage tanks; therefore, this condition is not auditable.	None.	N/A	N/A	N/A	N/A
	Record keeping of the effluent handling, storage and transfer must be kept up-to-date and accurate.	N/A	No effluent is produced from the storage tanks; therefore, this condition is not auditable.	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	The Tank Farm is regularly inspected for leaks and when deviations to the tank or the bund wall is noted, it is recorded and scheduled for maintenance.  Any environmental incidents such as spills	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>and leaks at the Tank Farm are handled in accordance with the site wide SOP (The reporting, investigation and recording of environmental incidents (SSP-S-O13) and the Works Emergency Action Plan (SS-S-041)) 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"> <li>Incident and complaints register;</li> <li>The reporting, investigation and recording of environmental incidents (SSP-S-013) dated 25 July 2019</li> </ul>					

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"> <li>Works Emergency Action Plan (SSP-S-041)</li> </ul>					
	All materials within the Tank Farm 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 that the Tank Farm is in an impermeable bunded area that is impervious to the stored substance, and it was confirmed that it is able to contain 110% volume of the largest container stored.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> <li>Visual Site Observation</li> </ul>	None.	N/A	N/A	N/A	N/A
	MSDS's should be displayed for all chemicals contained in the Tank Farm. This must take cognisance of the storage, handling, transportation and disposal of chemicals and hazardous materials.	C	<p>The MSDS is displayed and available in a file in the offices adjacent to the Tank Farm.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	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"> <li>MSDS: <ul style="list-style-type: none"> <li>Nitrate dated 27 August 2021;</li> <li>Ammonia Anhydrous dated 04 November 2020;</li> <li>Substances Mixture dated 16 March 2020;</li> <li>Berusynth dated 29 May 2018;</li> <li>Siralox dated 11 December 2021; and</li> <li>Fuel gas dated 26 August 2020.</li> </ul> </li> </ul>					
<b>4.1.3 Spillage and Incidents</b>								
	All chemicals and other hazardous materials (the liquid feedstock material) are to be stored in individual, designated and bunded areas, where the bunded area	C	The Auditor observed the Tank Farm is in an impermeable bunded area that is impervious to the stored substance, and it was confirmed	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)
	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.		that it is able to contain 110% volume of the largest container stored. <i>Evidence:</i> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> <li>Visual Site Observation</li> </ul>					
	Regular inspections of the above ground storage Tank Farm must be undertaken.	C	The auditor was informed that visual inspections are conducted on a daily basis at the Tank Farm. <i>Evidence:</i> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> </ul>	None.	N/A	N/A	N/A	N/A
	The necessary containment facilities, such as all the individual bunded areas must be well maintained in order to ensure integrity.	C	The Cobalt Catalyst tanks bunds form part of the operational areas that are visually inspected on a daily basis. The auditor observed that the bunds were well maintained. It was observed that 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)
			<p>bunds contain coal dust from the overhead conveyor belt that runs across the Tank Farm from another plant. The coal dust is swept and returned to the plant.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> <li>Visual Site Observation</li> </ul>					
	MSDS's should be displayed for all chemicals and hazardous materials stored on site, including the liquid feedstock material. This must take cognisance of the storage, handling, transportation and disposal of chemicals and hazardous materials.	C	<p>The MSDS is displayed and available in a file in the offices (at Cobalt Catalyst Manufacturing) adjacent to the Tank Farm.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> <li>MSDS: <ul style="list-style-type: none"> <li>Nitrate dated 27 August 2021;</li> </ul> </li> </ul>	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"> <li>Ammonia Anhydrous dated 04 November 2020;</li> <li>Substances Mixture dated 16 March 2020;</li> <li>Berusynth dated 29 May 2018;</li> <li>Siralox dated 11 December 2021; and</li> <li>Fuel gas dated 26 August 2020.</li> </ul>					
	Emergency Preparedness and Response Procedures must be provided should an incident or the spillage of hazardous chemicals occur	C	<p>The Tank Farm is regularly inspected for leaks and when deviations to the tank or the bund wall is noted, they are recorded and que for maintenance.</p> <p>Emergency response ( Works Emergency Action Plan and the General Spillage</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)
			<p>Handling Procedure) 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"> <li>Incident and complaints register</li> <li>General spillage handling procedure (PE3-GEN-OTM-002)</li> <li>Works Emergency Action Plan (SS-S-041)</li> </ul>					
	Should an incident or spillage take place, all surface run-off from the Tank Farm must go to the OWS under controlled conditions.	NC	The auditor was informed that any spillages from the Tank Farm is not routed to the OWS, however, it is reported as an incident and cleaned on site.	It is recommended that this condition is amended to reflect the current	N/A	This condition is practical to the Cobalt Tank Farms.	The non-compliance will have an impact in the event of incident or spillage.	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)
			<i>Evidence:</i> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> </ul>	operations on site.  <i>Timeframe:</i> <ul style="list-style-type: none"> <li>Medium term – 6 to 12 months</li> </ul>				
	The OWS must be continuously monitored and maintained in order to ensure optimum performance.	C	The auditor was informed that the OWS is monitored on a daily basis and maintenance is based on the Sasol One planned maintenance schedule.  <i>Evidence:</i> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> </ul>	None.	N/A	N/A	N/A	N/A
	An OWS Maintenance Procedure must be implemented.	C	The OWS is operated and maintained in accordance with the Management of Water and Waste procedure (SSP-S-030) and the Tank/ Cobalt Catalyst Manufacturing Effluent	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>procedure (SCCM-PRD-40082).</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>■ SOP for the Tank/cobalt catalyst manufacturing effluent (SCCM-PRD-40082)</li> <li>■ SOP for Management of water and waste on the Sasol One and Midlands site</li> </ul>					
<b>4.1.4 Surface Water</b>								
	The contractor laydown area should allow for surface water run-off to flow directly to the OWS under controlled conditions, to ensure no potential contamination of surface water. This includes all incidents and spillages that may take place from the Tank Farm.	N/A	This condition is outside the current audit period and refers to a requirement prior to commencement of the construction phase and was therefore 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)
	The OWS must be continuously monitored and maintained in order to ensure optimum performance.	C	<p>The auditor was informed that the OWS is monitored on a daily basis and maintenance is based on the Sasol One planned maintenance schedule.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> </ul>	None.	N/A	N/A	N/A	N/A
	An OWS Maintenance Procedure must be implemented.	C	<p>The OWS is operated and maintained in accordance with the Management of Water and Waste procedure (SSP-S-030) and the Tank/ Cobalt Catalyst Manufacturing Effluent procedure (SCCM-PRD-40082).</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>SOP for the Tank/ cobalt catalyst manufacturing</li> </ul>	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)
			effluent (SCCM-PRD-40082) <ul style="list-style-type: none"> <li>SOP for Management of water and waste on the Sasol One and Midlands site</li> </ul>					
	The necessary containment facilities, such as all the individual bunded areas must be well maintained in order to ensure integrity	C	The Cobalt Catalyst tanks bunds form part of the operational areas that are inspected on a daily basis. The auditor observed that the bunds were well maintained. <i>Evidence:</i> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> <li>Visual Site Observation</li> </ul>	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	The Tank Farm is regularly inspected for leaks and when deviations to the tank or the bund wall is noted, they are recorded 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)
			<p>scheduled for maintenance.</p> <p>Emergency response ( Works Emergency Action Plan and the General Spillage Handling Procedure) 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"> <li>Incident and complaints register</li> <li>General spillage handling procedure (PE3-GEN-OTM-002)</li> </ul>					
	Storm water management measures must be applied to ensure that only clean storm water is routed via the Sasol	C	The stormwater at the Tank Farm is managed in accordance with the Sasol One Stormwater	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)
	One storm water system. Continue to monitor, record and evaluate water consumption		<p>Management Plan. All water on site is considered 'dirty' water that is routed to Bioworks for treatment to be reused.</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"> <li>SWMP ( SO-env-1192) dated December 2023</li> <li>Water volume log sheet</li> <li>Verbal Confirmation</li> </ul>					
	Implement water saving practices through existing environmental management systems	C	<p>The water on the Sasol One site is managed in accordance with the requirements of the WUL to ensure water saving practices on site. Moreover, the</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)
			<p>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"> <li>Visual Site Observation</li> <li>WUL (14/C22K/FG/4958)</li> <li>Internal WUL Audit Report (14/C22K/FG/4958) dated 10 January 2024</li> </ul>					
	The closure and rehabilitation of this facility must be planned in advance of decommissioning and closure	N/A	Noted. This condition is outside the current audit period and refers to a requirement during 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)
	and be undertaken in accordance with the rehabilitation and closure plans of the Sasol One Complex.		closure phase and not the operational phase, therefore it was not audited.					
	Rehabilitation and closure planning must ensure the protection and rehabilitation of surface water within the Sasol One Complex.	N/A	Noted. This condition is outside the current 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
<b>4.1.5 Groundwater</b>								
	Emergency Preparedness and Response Procedures must be provided should an incident or the spillage of hazardous chemicals occur.	C	The Tank Farm is regularly inspected for leaks and when deviations to the tank or the bund wall is noted, they are recorded and scheduled for maintenance.  Emergency response (Works Emergency)	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>Action Plan and the General Spillage Handling Procedure) to spills and leaks is available for implementation in the event incidents occurs.</p> <p>No incidents were noted for the Tank Farm during the audit period.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Incident and complaints register</li> <li>General spillage handling procedure (PE3-GEN-OTM-002)</li> </ul>					
	Ensure that the proposed project buildings are fully contained, lined and located on an impervious substance / base.	C	The auditor observed the Tank Farm is in an impermeable bunded area that is impervious to the stored substance and able to contain 110% volume of the largest container stored.	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)
			<i>Evidence:</i> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>					
<b>4.1.6 Waste Management</b>								
	General waste disposal bins will be made available for disposal of all general waste to contractors and employees	<b>C</b>	General waste bins are available across the Tank Farm facility. The waste is disposed in separate bins designated for general waste, steel waste and contaminated waste.  <i>Evidence:</i> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	None.	N/A	N/A	N/A	N/A
	General waste disposal bins must be correctly labelled	<b>C</b>	General waste bins are available across the Tank Farm facility. The waste is disposed in separate colour coded wheelie bins labelled for	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>general waste, steel waste and contaminated waste.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>					
	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	<p>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.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>EnviroServ waste manifests</li> <li>Averda waste manifests</li> <li>EnviroServ Safe Disposal Certificates</li> <li>Waste register</li> <li>Verbal Confirmation</li> </ul>	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)
	Records of all waste being taken off site must be recorded and kept as evidence, and evidence of correct disposal must be kept.	C	<p>Sasol One Site and Sasol Operations at large manages waste as per their standard operating waste procedure (SS-S-014) required by NEM:WA, along with the associated waste regulations, and the applicable norms and standards, as well as duty of care. The Auditor reviewed the waste manifests kept in the administration office.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Waste Manifests</li> <li>Procedure for the removal of waste from the SEO Sasolburg Sites (SS-S-014) dated 01 August 2022</li> </ul>	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)
	Hazardous materials generated during spillages must be cleaned up using absorbent material provided in spill kits on site.	C	<p>The auditor observed spill kits around the site during the audit that will be used 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"> <li>■ SOP for Removal of wastes from the Sasolburg Operations sites (SSP-S-014) dated 01 August 2022</li> <li>■ Visual Site Observation</li> </ul>	None.	N/A	N/A	N/A	N/A
	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	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)
			waste bins and skips to ensure separation of domestic and hazardous waste.  <i>Evidence:</i> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>					
	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 by any chemicals stored on site.  <i>Evidence:</i> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	None.	N/A	N/A	N/A	N/A
	The storage area should be covered, where required, labelled and well ventilated.	C	As part of the external audit submission dated 29 November 2019, the condition was amended to state that "Sasolburg Operations' waste	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>management procedure, SSP-S-014 was updated and requires waste signage and coverage of waste skips where required in line with NEM:WA part 5 section 21 regarding general requirements for the storage of waste.” The amendment was approved on the 01 February 2021.</p> <p>The Auditor observed the skips were covered and abide to the requirements of the NEM:WA part 5 section 1 regarding general storage, collection and transportation of waste.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Approval Letter for the Exemption Application: SO-env-613: Construction of</li> </ul>					

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>Tanks for Cobalt Catalyst Manufacturing facility Sasol 1 Complex dated 01 February 2021.</p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>					
	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 the necessary PPE. The PPE issued by Sasol is suitable to handle hazardous materials. Sasol does not allow contractors and service providers to access the plant unless they wear the required PPE to handle hazardous materials.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>PPE Register</li> </ul>	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"> <li>Onsite Observation</li> <li>Verbal confirmation</li> </ul>					
<b>4.1.7 Flora and Fauna</b>								
	Weeds, alien and invasive vegetation must be removed should ingress occur.	N/A	Noted. The Tank Farms are located on an industrial area that is concreted. Therefore weeds, alien and invasive species are unlikely to occur.	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 of the Sasol One Complex.	N/A	Noted. This condition is outside the current audit period and refers to a requirement during the closure phase and not the operational phase, therefore this condition was not audited.	None.	N/A	N/A	N/A	N/A
<b>4.1.8 Air Quality</b>								
	Should any emissions arise from the project, they will be	N/A	Noted. The Auditor was informed that there are	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)
	dealt with in the DeNox (a unit that converts harmful nitrogen oxides to nitrogen and water) and the Volatile Organic Compound (VOC) units during the Operational Phase (the air permit is included into the larger project scope).		no emissions from the Tank Farm therefore this condition was not audited.					
<b>4.1.9 Noise</b>								
	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. Where necessary appropriate actions should be taken to mitigate the noise levels.	<b>C</b>	<p>All complaints and incident registers are kept on the SAP-EC system. The open incident or complaints items 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> <p><i>Evidence:</i></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)
			<ul style="list-style-type: none"> <li>Incidents and complaints register</li> <li>Verbal Confirmation</li> </ul>					

#### 4.1.10 Local Contractors and Suppliers

	Local contractors and suppliers should be informed of the proposed project.	N/A	Noted. This condition is outside the current audit period and refers to a requirement during the construction phase and not the operational phase, therefore this condition was not audited.	None.	N/A	N/A	N/A	N/A
	As far as possible local labourers will be appointed for skilled and semi-skilled temporary positions.	N/A	Noted. This condition is outside the current audit period and refers to a requirement during the construction phase and not the operational phase, therefore this condition was not audited.	None.	N/A	N/A	N/A	N/A

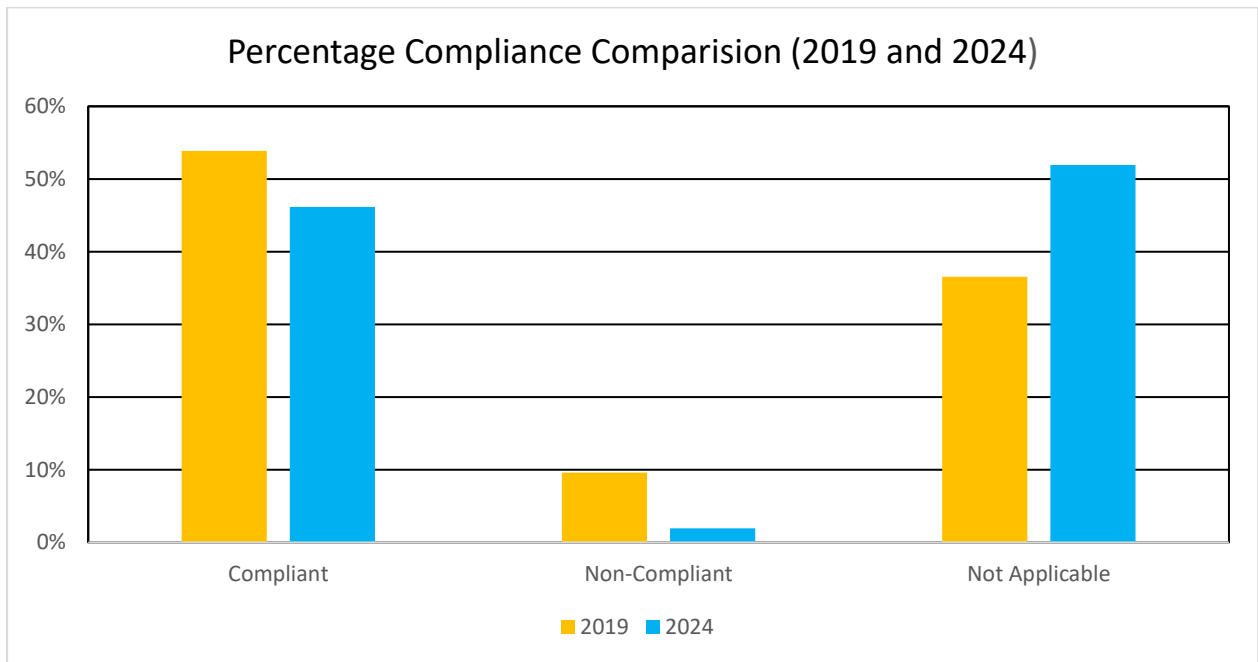
#### 4.1.11 Safety and Health Aspects

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 contractors and employees will be provided with the appropriate PPE for all phases of the project.  Appropriate health and safety training and awareness must be provided.	N/A	The Auditor was informed that this condition is out of scope, therefore it was not audited.	None.	N/A	N/A	N/A	N/A
	A forum for communication and engagement should be developed to ensure that concerns and issues raised by the community are managed, should significant concerns be raised by the community.	N/A	The Auditor was informed that this condition is out of scope, therefore it was not audited.	None.	N/A	N/A	N/A	N/A



## 5 PROGRESS AGAINST PREVIOUS AUDIT FINDINGS

The previous EA and EMPr compliance audit report was compiled by the Northwest University CEM in 2019. A comparison in the change of compliance rating between 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 three 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
<b>EA Conditions</b>					
<b>3.1 Scope of Authorisation</b>					
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	NC	During the audit evidence was found that the Cobalt manufacturing process was modified around 2012, where the process that was undertaken until 2015, deviated from the process authorised. However, no EA	N/A	Noted. This audit confirmed that there has not been any deviation from the conditions set out in the authorisation documentation.

Ref	Commitment	2019 Status	2019 Finding	2024 Status	2024 Finding
	<p>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.</p>		<p>amendment was done at the time. Evidence was found that an amendment application to modify the EA to reflect the modified process was submitted to the DESTEA on 12 October 2018 and approved on 1 February 2019.</p>		
<b>4. Management of Activity</b>					
4.1	<p>The provision of the Environmental management Plan (EMP) included in the Basic Assessment Report dated (19 January 2009) are an extension to the conditions of authorization and non-compliance with the conditions of the EMP would accordingly constitute non-compliance with the conditions of this authorization.</p>	N/A	Noted	C	<p>Sasol Operations implemented SAP Environmental Compliance (SAP EC) as an environmental management system tool to ensure and capture proof of compliance with conditions in the EA, EMP and other approved authorisations.</p>
4.3	<p>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 .</p>	C	<p>During the audit evidence was found that the Environmental Authorisation (EA) had been amended on 3 December 2018 to reflect the new location, and on 9 November 2019 to reflect the new owner of the EA, Mr Rightwell Laxa as Senior Vice President Sasolburg Operations, with effect from 1 February 2019 and that the</p>	N/A	<p>The Auditor was informed that there was no change of ownership and/or project developer of the Cobalt Catalyst Tanks.</p>

Ref	Commitment	2019 Status	2019 Finding	2024 Status	2024 Finding
			will assume all responsibilities and accountabilities associated with the EAs that were issued by the DESTEA, including this EA.		
<b>8. Construction &amp; Operation</b>					
8.1.3	All incidents and spillages, such as mixing of liquid feedstock raw material, must be cleaned up.	C	<p>Incidents and spillages are dealt with in terms of the following:</p> <ul style="list-style-type: none"> <li>SSP-S-013 Procedure for the reporting, investigation and reporting of environmental incidents rev07 dated 2019/07/25</li> <li>SSP-S-041 Works Emergency Action Plan, Rev 06, dated 2016-11-14</li> <li>Area Emergency Action Plan FT3 Rev 01, dated 2019-05-30</li> </ul>	N/A	This condition is outside the current audit period and refers to a requirement prior to commencement of the construction phase and was therefore not audited.
8.1.4	Industrial waste skips must be correctly labelled, covered and placed with the correct signage .	NC	Industrial waste skips are colour coded to facilitate waste separation, but not labelled, covered and does not display any signage, as specified in the environmental authorisation	C	<p>As part of the external audit submission dated 29 November 2019, the condition was amended to state that "Sasolburg Operations' waste management procedure, SSP-S-014 was updated and requires waste signage and coverage of waste skips where required in line with NEM:WA part 5 section 21 regarding general requirements for the storage of waste." The amendment was approved on the 01 February 2021.</p> <p>The Auditor observed the skips were covered and abide to the requirements of the NEM:WA part 5 section</p>

Ref	Commitment	2019 Status	2019 Finding	2024 Status	2024 Finding
					1 regarding general storage, collection and transportation of waste.
8.1.6	Should an incident or spillage take place, all surface run-offs from the Tank Farm must go to the Oily Water Sewage System (OWS) under controlled conditions.	C	<p>Incidents and spillages from the tank farm that could pollute surface water run-offs are regulated by the following documents:</p> <ul style="list-style-type: none"> <li>SSP-S-030 Management of water and waste water on the Sasol One and Midland sites covers the handling of effluent (contaminated storm water runoff)</li> <li>Water and Effluent Agreement Sasol Infrachem Water and Waste and Sasol Cobalt Catalyst Manufacturing Plant (SCCM), dated March 2010 establishes water quality specifications and discharge volumes for permissible release of effluent to different sewer system</li> </ul>	NC	The Auditor was informed that any spillages from the Tank Farm is not routed to the OWS, however, it is reported as an incident and cleaned on site.
<b>8.2 Effluent generation</b>					
8.2.1	Effluent from the facility must tie into the existing Sasol One effluent management system.	C	<p>Incidents and spillages from the tank farm that could pollute surface water run-offs are regulated by the following documents:</p> <ul style="list-style-type: none"> <li>SSP-S-030 Management of water and waste water on the Sasol One and Midland sites covers the handling of effluent (contaminated storm water runoff)</li> <li>Water and Effluent Agreement Sasol</li> </ul>	N/A	Noted. No effluent is produced from the storage tanks therefore this condition is not auditable.

Ref	Commitment	2019 Status	2019 Finding	2024 Status	2024 Finding
			<p>Infrachem Water and Waste and Sasol Cobalt Catalyst Manufacturing Plant (SCCM), dated</p> <ul style="list-style-type: none"> <li>March 2010 establishes water quality specifications and discharge volumes for permissible release of effluent to different sewer system</li> </ul>		
<b>8.5 Waste Management</b>					
8.5.2	General waste bins will be correctly labelled.	NC	General waste bins are colour coded to facilitate waste separation, but not labelled, as specified in the environmental authorisation.	C	General waste bins are available across the Tank Farm facility. The waste is disposed in separate colour coded wheelie bins labelled for general waste, steel waste and contaminated waste.
8.5.5	The storage area will be covered, where required labelled and well ventilated.	NC	The waste storage area is well-ventilated, but not labelled and covered, while the waste bins are colour coded to facilitate waste separation.	C	<p>As part of the external audit submission dated 29 November 2019, the condition was amended to state that "Sasolburg Operations' waste management procedure, SSP-S-014 was updated and requires waste signage and coverage of waste skips where required in line with NEM:WA part 5 section 21 regarding general requirements for the storage of waste." The amendment was approved on the 01 February 2021.</p> <p>The Auditor observed the skips were covered and abide to the requirements of the NEM:WA part 5 section 1 regarding general</p>

Ref	Commitment	2019 Status	2019 Finding	2024 Status	2024 Finding
					storage, collection and transportation of waste.
<b>9. General</b>					
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.	NC	No evidence could be found during the audit that the Department has been notified of non-compliances to the conditions of the authorisation that was identified during the internal audit of the authorisation that was undertaken in July 2019.	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.

## 6 SUMMARY OF THE AUDIT FINDINGS

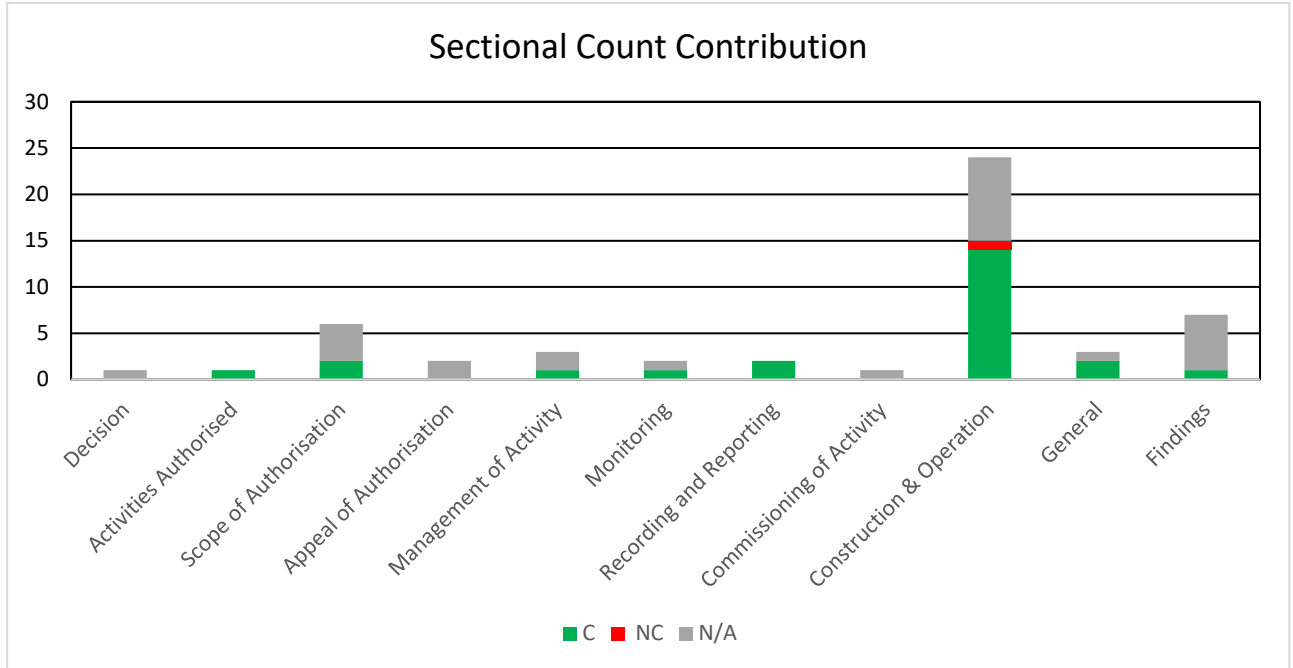
### 6.1 SASOL SASOLBURG COBALT CATALYST TANK FARM EA COMPLIANCE

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.

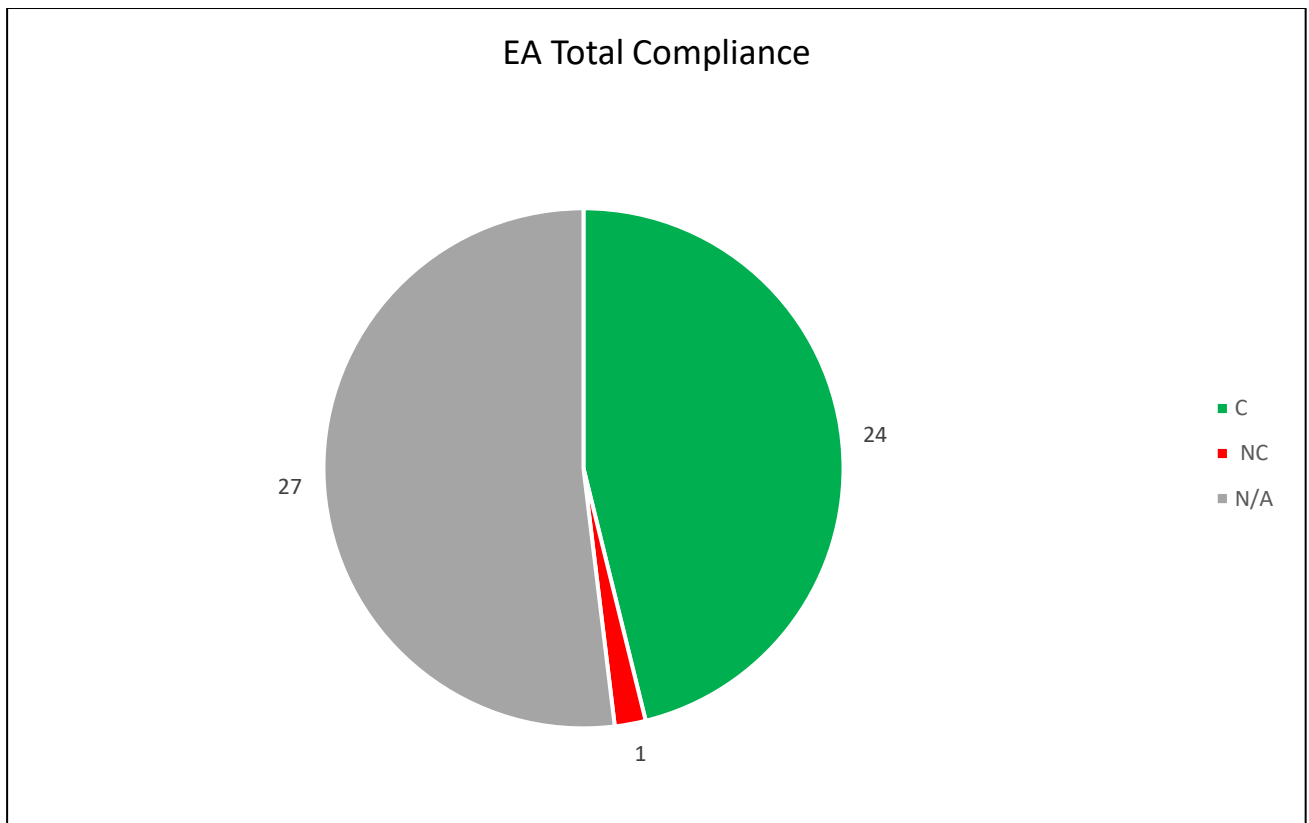
**Table 6-1 - Summary of EA Compliance Audit Findings**

Section of the EA	No. Commitments	C	NC	N/A
Decision	1	0	0	1
Activities Authorised	1	1	0	0
Scope of Authorisation	6	2	0	4
Appeal of Authorisation	2	0	0	2
Management of Activity	3	1	0	2
Monitoring	2	1	0	1
Recording and Reporting	2	2	0	0
Commissioning of Activity	1	0	0	1
Construction & Operation	24	14	1	9
General	3	2	0	1
Findings	7	1	0	6
Total	52	24	1	27
Total Percentage		46%	2%	52%
Percentage Compliance with Applicable Conditions	96%			

**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.



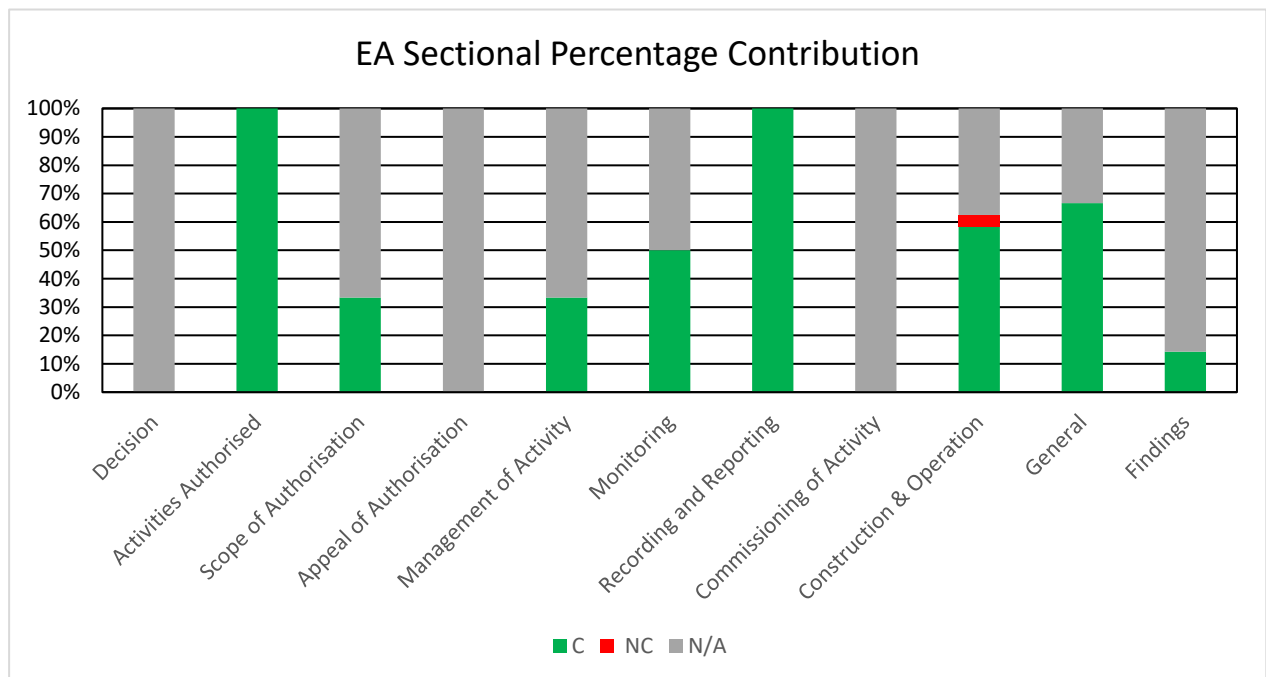
**Figure 6-1 - Number/Count contribution of findings made to the EA conditions per section**



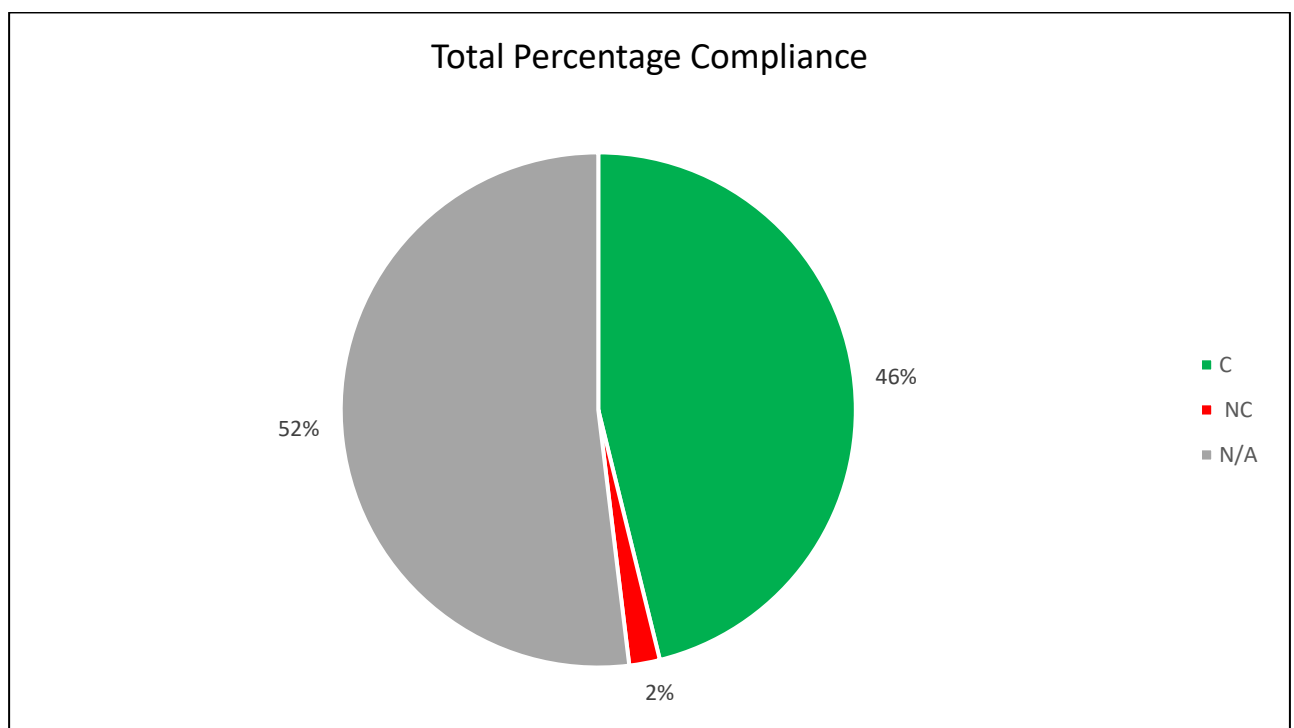
**Figure 6-2 - Overall count findings on compliance to the EA commitments**



**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**

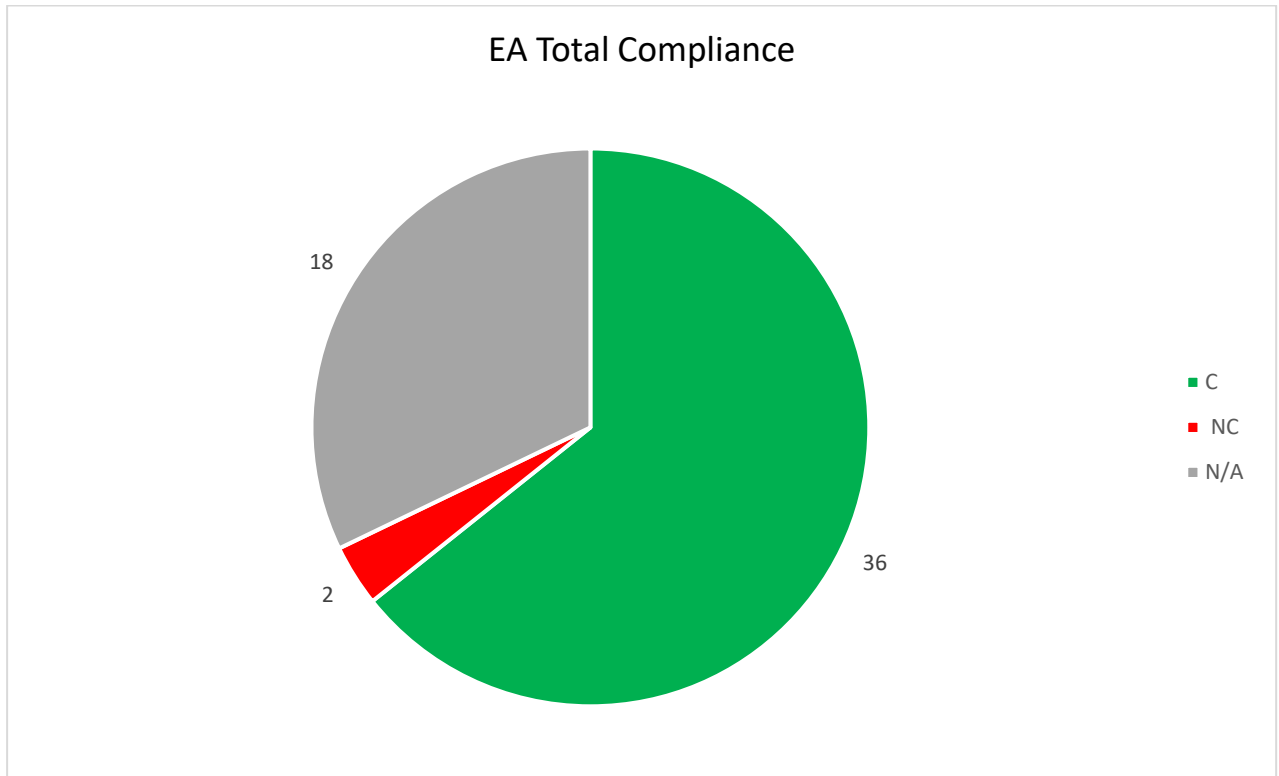
## 6.2 SASOL SASOLBURG COBALT CATALYST TANK FARM EMPR COMPLIANCE

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.

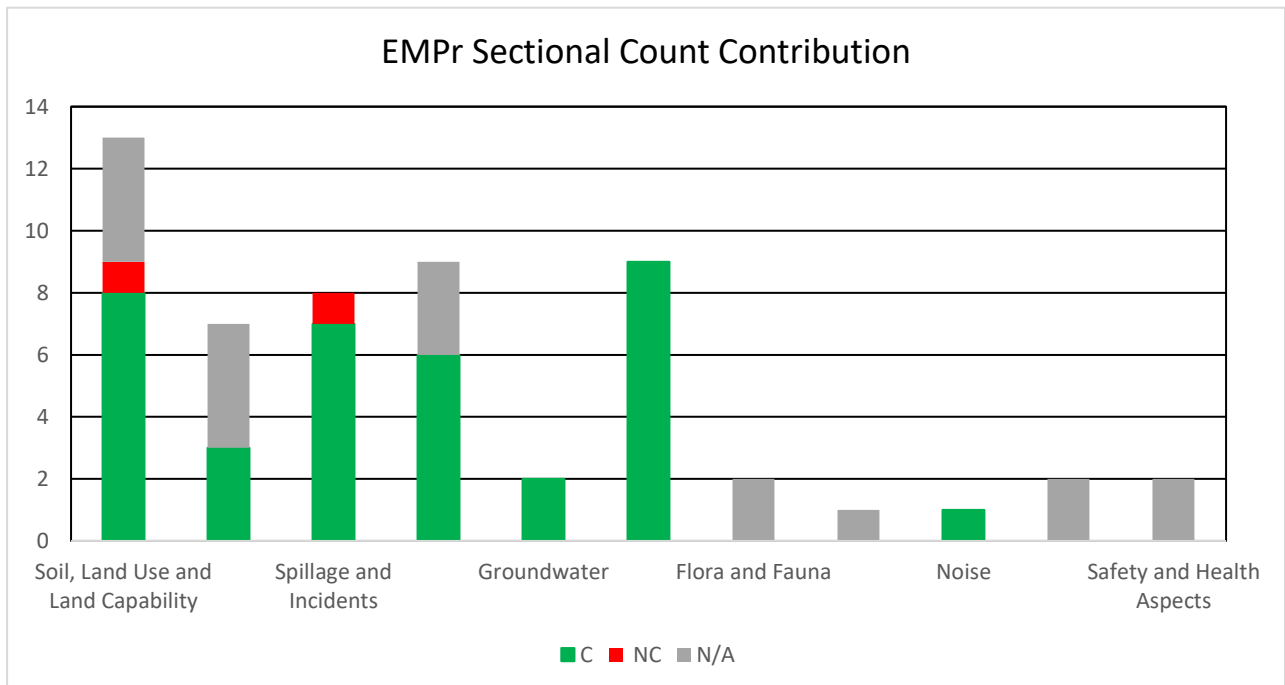
**Table 6-2 - Summary of EMPr Compliance Audit Findings**

Section of the EMPr	No. Commitments	C	NC	N/A
Soil, Land Use and Land Capability	13	8	1	4
Effluent Generation	7	3	0	4
Spillage and Incidents	8	7	1	0
Surface Water	9	6	0	3
Groundwater	2	2	0	0
Waste Management	9	9	0	0
Flora and Fauna	2	0	0	2
Air Quality	1	0	0	1
Noise	1	1	0	0
Local Contractors and Suppliers	2	0	0	2
Safety and Health Aspects	2	0	0	2
Total	57	36	2	18
Total Percentage		63%	4%	32%
Percentage Compliance with Applicable Conditions	92%			

**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.

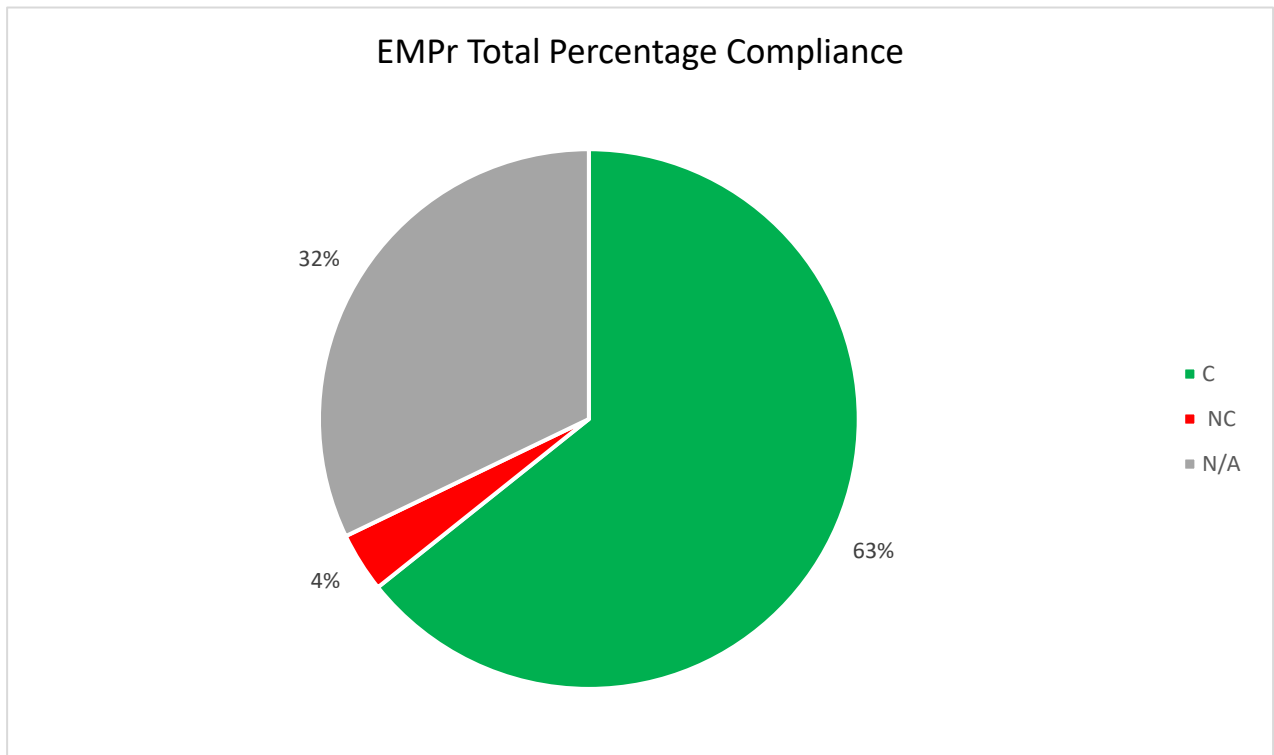


**Figure 6-4 - Overall count findings on compliance to the EMPr Commitments**

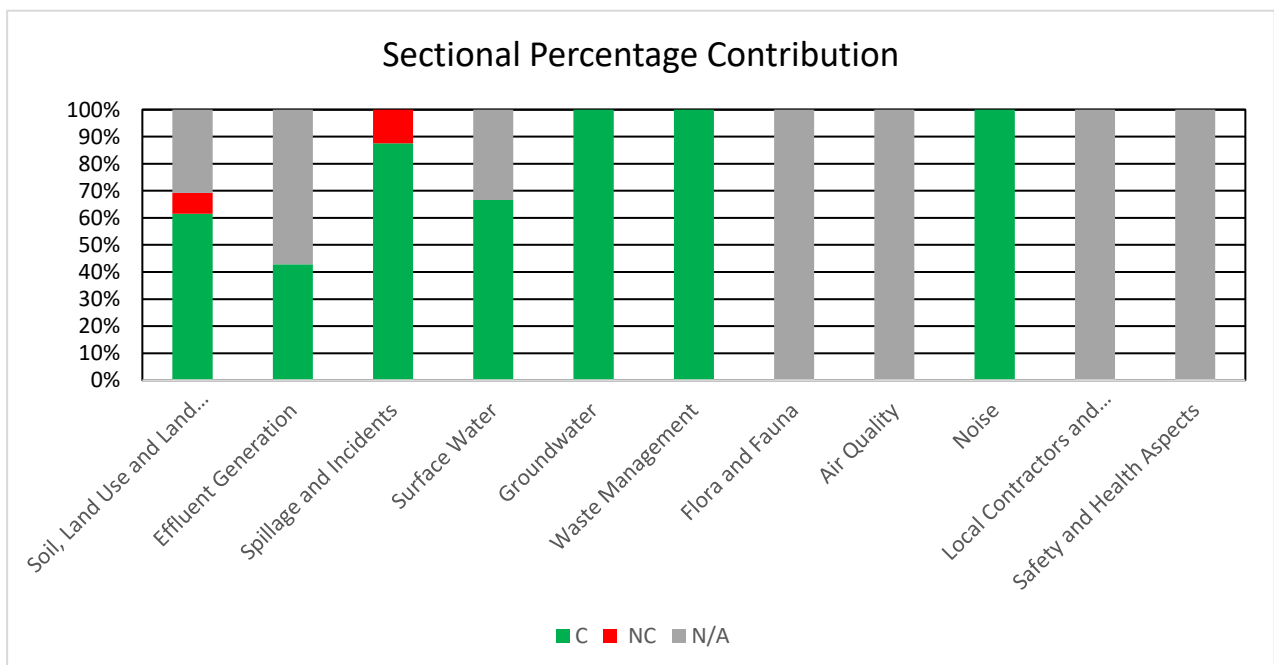


**Figure 6-5 - Number/Count contribution of findings made to the EMPr Commitments per Section**

**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

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Three non-compliances in terms of the EA conditions and EMPr commitments were observed during the audit. The recommendation as outlined in **Table 4-1** and **Table 4-2** should be implemented as soon as practicable, and in line with the stated timeframes. Sasol is advised to adhere to implemented recommendations to achieve 100% for the EA and EMPr audit and is urged to continue to implement the environmental mitigation measures within the EA and EMPr.

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

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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

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### 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 Tanks and compared the operations to the approved EMPr and compiled this report to the best of my knowledge. This section should be read with **Section 2.**

Signed at \_\_\_\_\_Midrand\_\_\_\_\_ on this the \_\_\_\_\_07 November\_\_\_\_\_2024

\_\_\_\_\_

SIGNATURE OF INDEPENDENT AUDITOR

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

# Appendix A

## AUDITOR CVS





## Matilda Mbazo

Earth and Environment, Environmental Planning & Advisory, Graduate Consultant

### CAREER SUMMARY

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



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**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.



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#### 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 – Above ground storage tanks at catalyst productions

### 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.

Activity	Impact Management Outcome	Impact Management Action
1. soil, Land use, land capability	Ensure sound environmental management regarding soil, and land use and land capability during all phases 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 all the individual bunded areas must be well maintained in order to ensure integrity
		1.3 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.
		1.4 Industrial waste skips must be correctly labelled, covered, where required, and placed with the correct signage.
		1.5 The storage area for industrial waste/material must be within a designated and bunded area, 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.
		1.6 Industrial waste skips must be correctly labelled, covered, where required, and placed with the correct signage
		1.7 Records of all waste being taken off site must be recorded and kept as evidence
		1.8 Should an incident or spillage take place; Sasol will assess the spill inside the containment bund and the spill can either be sent to effluent control via the OWS or sucked out by third party waste management company and disposed of responsible.
		1.9 The OWS must be continuously monitored and maintained in order to ensure optimum performance.



		1.10 An OWS Maintenance Procedure must be implemented
		1.11 A Safety Datasheet (SDS) should be displayed for all chemicals and hazardous materials (all the liquid feedstock material). This must take cognizance of the storage, handling, transportation and disposal of these chemicals and hazardous materials.
<b>2. Effluent Generation</b>	Ensure sound environmental management regarding effluent generation and management at the facility during all phases of the project.	2.1 Emergency Preparedness and Response Procedures must be provided should an incident or the spillage of hazardous chemicals occur
		2.1 All materials within the Tank Farm 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.
		2.3 SDS's should be displayed for all chemicals contained in the Tank Farm. This must take cognizance of the storage, handling, transportation and disposal of chemicals and hazardous materials.
<b>3. Spillages and incidents</b>	Ensuring sound environmental management regarding spillages and incidents should they occur during all phases of the project	3.1 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.
		3.2 Regular inspections of the above ground storage Tank Farm must be undertaken
		3.3 The necessary containment facilities, such as all the individual bunded areas must be well maintained in order to ensure integrity.
		3.4 SDS's should be displayed for all chemicals and hazardous materials stored on site, including the liquid feedstock material. This must take cognizance of the storage, handling, transportation and disposal of chemicals and hazardous materials.
		3.5 Emergency Preparedness and Response Procedures must be provided should an incident or the spillage of hazardous chemicals occur.
		3.6 Should an incident or spillage take place; Sasol will assess the spill inside the

		containment bund and the spill can either be sent to effluent control via the OWS or sucked out by third party waste management company and disposed of responsibly.
		3.7 The OWS must be continuously monitored and maintained in order to ensure optimum performance.
		3.8 An OWS Maintenance Procedure must be implemented.
<b>4. Surface water</b>	Ensure sound environmental management regarding surface water during all phases of the project	4.1 The OWS must be continuously monitored and maintained in order to ensure optimum performance.
		4.2 An OWS Maintenance Procedure must be implemented.
		4.3 The necessary containment facilities, such as all the individual bunded areas must be well maintained in order to ensure integrity
		4.4 Emergency Preparedness and Response Procedures must be provided should an incident or the spillage of hazardous chemicals occur.
		4.5 Storm water management measures must be applied to ensure that only clean storm water is routed via the Sasol One storm water system.
		4.6 Implement water saving practices through existing environmental management systems
<b>5. Groundwater</b>	Ensure sound environmental management regarding groundwater during all phases of the project	5.1 Emergency Preparedness and Response Procedures must be provided should an incident or the spillage of hazardous chemicals occur.
		5.2 Ensure that the proposed project buildings are fully contained, lined and located on an impervious substance/base
<b>6. Waste management</b>	Ensure sound environmental management regarding waste management on site during all phases of the project	6.1 General waste disposal bins should be made available for disposal of all general waste to contractors and employees.
		6.2 General waste disposal bins must be correctly labelled.
		6.3 Records of all waste being taken off site must be recorded and kept as evidence, and evidence of correct disposal must be kept.
		6.4 Hazardous materials will be generated if there are spillages. This waste should be cleaned up using absorbent material provided in spill kits on-site and disposed of at an appropriate hazardous chemical waste disposal site.

		6.5 Absorbent materials used to clean up spillages should be disposed of in a separate hazardous waste bin
		6.6 The storage area will be covered, where required labelled and well ventilated
		6.7 Waste will be temporarily stored on site (less than 90 days) before being disposed of appropriately at an approved waste disposal facility, or recycled where possible
<b>7. Flora and Fauna</b>	Ensure sound environmental management regarding the fauna and flora during all phases of the project	7.1 Weeds, alien and invasive vegetation must be removed should ingress occur
<b>8. Noise</b>	Ensure sound Environmental management regarding the noise level during all phases of the project	8.1 A complaints register must be made available, and should any complaints be received, these should be logged on the complaints register and reported to the responsible person on site.