



Our reference: SO-ENV-1324

29 November 2024

Your Ref: EA nr EMS/1(a),1(k),23(c),19(e),1(j),1(o)/08/80

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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.

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Attached, please find the compliance audit report for the establishment of the Expansion of Fischer Tropsch Wax Plant (FTWEP) facility, Environmental Authorisation with reference EMS/1(a),1(k),23(c),19(e),1(j),1(o)/08/80, dated October 2024.

We are pleased that the report indicates full compliance to the stipulated conditions.

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

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

No impact management outcome or impact management action requires amendment for the Expansion of the Fischer Tropsch Wax Plant (FTWEP) facility

Yours faithfully

Signed by: Johann Van Wyk  
Signed at: 2024-11-29 11:09:37 +02:00  
Reason: I approve

*Johann Van Wyk*

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

Expansion of Fischer Tropsch Wax Plant ref - EMS/1(a),1(k),23(c),19(e),1(j),1(o)/08/80



Sasol South Africa Ltd

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**EXPANSION OF FISCHER TROPSCH WAX  
PLANT (FTWEP) ENVIRONMENTAL  
AUTHORISATION (REF. NO:  
EMS/1(A),1(K)1(O),23(C),25,1(C),1(E),1(J),1(P)/08/  
80 AND ENVIRONMENTAL MANAGEMENT  
PROGRAMME AUDIT**

Compliance Audit Report: July 2019 - July 2024





Sasol South Africa Ltd

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**EXPANSION OF FISCHER TROPSCH WAX  
PLANT (FTWEP) ENVIRONMENTAL  
AUTHORISATION (REF. NO:  
EMS/1(A),1(K)1(O),23(C),25,1(C),1(E),1(J),1(P)/  
08/80 AND ENVIRONMENTAL MANAGEMENT  
PROGRAMME AUDIT**

Compliance Audit Report: July 2019 - July 2024

**TYPE OF DOCUMENT (VERSION) CONFIDENTIAL**

**PROJECT NO. 41106913**

**DATE: OCTOBER 2024**



Sasol South Africa Ltd

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**EXPANSION OF FISCHER TROPSCH WAX  
PLANT (FTWEP) ENVIRONMENTAL  
AUTHORISATION (REF. NO:  
EMS/1(A),1(K)1(O),23(C),25,1(C),1(E),1(J),1(P)/  
08/80 AND ENVIRONMENTAL MANAGEMENT  
PROGRAMME AUDIT**

Compliance Audit Report: July 2019 - July 2024

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# QUALITY CONTROL

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Remarks	Expansion of Fischer Tropsch Wax Plant (FTWEP) Final Audit Report			
Date	October 2024			
Prepared by	Matilda Mbazo			
Signature				
Checked by	Anri Scheepers			
Signature				
Authorised by	Anri Scheepers			
Signature				
Project number	41106913			
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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: EMS/1(a),1(k),1(o),23(c),25,1(c), 1(e),1(j), 1(p)/08/80) for the Expansion of the Fischer Tropsch Wax Plant (FTWEP) and the Environmental Management Programme (EMPr), and to compile an audit report according to the requirements of the National Environmental Management Act (No. 107 of 1998), as amended (NEMA).

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

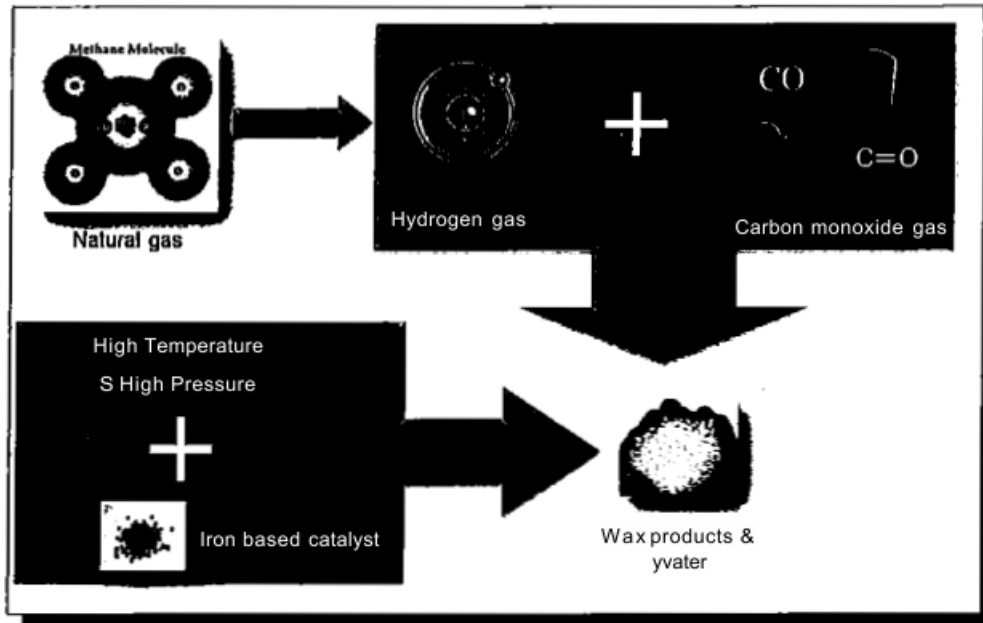
- EA for the Expansion of FTWEP facility located at the Sasol One site in Sasolburg (reference number: EMS/1(a),1(k),1(o),23(c),25,1(c), 1(e),10), 1(p)/08/80), dated 25 March 2009 and issued to Sasol by the Department of Tourism, Environmental and Economic Affairs (DTEEA), now the Department of Economic, Small Business Development, Tourism and Environmental Affairs (DESTEA);
- The amendment of the EA Expansion of FTWEP facility located at the Sasol One site in Sasolburg (reference number: EMS/1(a),1(k),1(o),23(c),25,1(c), 1(e), 1(j),1(p)/08/80), dated 16 September 2010 and issued to Sasol by the DESTEA;
- The amendment of the EA Expansion of FTWEP facility located at the Sasol One site in Sasolburg (reference number: EMS/1(a),1(k),1(o),23(c),25,1(c), 1(e),1(j), 1(p)/08/80), dated 18 September 2019 and issued to Sasol by the DESTEA. The amendments include:
  - Change of the activity authorised;
  - Change of location;
  - Change and removal of specific conditions:
    - Paragraph 1.16.1 was amended;
    - Paragraph 1.16.5 was hereby removed;
    - Paragraph 1.17.4 was amended;
    - Paragraph 1.18.1: was amended;
    - Paragraph 1.20.3 was amended;
    - Paragraph 1.20.4 was amended;
    - Paragraph 4 (e) was amended; and
    - Paragraph 4 (g) was amended.
- EMPr by Nemai Consulting dated August 2012.

## 1.2 PROJECT DESCRIPTION

Sasol Wax and Solvents is a division of Sasol Operations, which is a major company in Sasol's group of businesses. On the Sasol One Site, Sasol Wax operates Fischer-Tropsch-based

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technology for the manufacturing of synthetic waxes. The waxes are marketed and sold in commodity and speciality markets globally. Wax is produced from raw materials (natural gas, air, and steam) being transformed into a mixture of hydrogen and carbon monoxide (synthesis gases) in the presence of iron catalyst.



**Figure 1-1 - Wax Production Process**

The FTWEP process receives methane (CH<sub>4</sub>) from the ATR facility, which is then processed into a catalyst used in Section 4200. This catalyst is sent to Section 2600 to be stored in bins for wax synthesis. In Section 2600, gas is directed to Section 1600, where the liquid molten wax is further processed before being solidified into candle machines at Section 22000.

The EA regulates both Section 22000 and Section 2600, which are the focus of this audit.

### 1.3 PROJECT TEAM

WSP auditors, Matilda Mbazo and Yvette Mmanasoe, completed a site inspection of the FTWEP facility against the EA conditions (reference: EMS/1(a),1(k)1(o),23(c),25,1(c),1(e),10),1(p)/08/80) at the Sasol One facility on **18 July 2024**.

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

The project team is summarised in

**Table 1-1** and Curricula Vitae are included as **Appendix A**.

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

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

## 2 AUDIT SCOPE

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

The objective of the audit was to:

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

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

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

Sub-Section	Requirement	Report Section Reference
34 (2)a	The environmental audit report must be prepared by an independent person with the relevant environmental auditing expertise.	<b>Sub-section 1.3</b> and CV's 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>
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>

Sub-Section	Requirement	Report Section Reference
b	A declaration that the independent auditor is independent in a form as may be specified by the competent authority.	Sub-section 9
c	An indication of the scope of, and the purpose for which, the environmental audit report was prepared.	Sub-section 1.1 and Section 2
d	A description of the methodology adopted in preparing the environmental audit report.	Section 3
e	An indication of the ability of the EMPr, and where applicable, the closure plan to- (i) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis; (ii) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility; and (iii) ensure compliance with the provisions of environmental authorisation, EMPr, and where applicable, the closure plan.	Section 4
f	A description of any assumptions made, and any uncertainties or gaps in knowledge.	Sub-sections 0 and 2.2
g	A description of any consultation process that was undertaken during the course of carrying out the environmental audit report.	Sub-section 3.2
j	A summary and copies of any comments that were received during any consultation process.	Not applicable
k	Any other information requested by the competent authority.	None requested

## 2.1 DISCLAIMER

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

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

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

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

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

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

## 2.2 ASSUMPTIONS AND LIMITATIONS

WSP noted the following assumptions and limitations during the audit:

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

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

## 3 AUDIT METHODOLOGY

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



### 3.1 AUDIT CHECKLIST

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

### 3.2 SITE INSPECTION AND INTERVIEWS

An onsite inspection was conducted on **18 July 2024** during which findings and observations were recorded and are summarised in **Section 4**. Key personnel interviewed during the audit included:

- Suyen Van Zyl – SHE Environmental Specialist;
- Livingstone Mabasa – Area Manager (Section 2600);
- Sarel van der Watt– Administrator(Section 2600);
- Theophilus Neevar – Production Manager (Section 22000);
- Lutendo Maemu – Process Technician (Section 22000);
- Ruaan Jacobs – Senior Process Technician (Section 22000); and
- Haydn Johns – Production Foreman (Section 22000).

### 3.3 INFORMATION CONSIDERED

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

- Air Emissions Licence (FDDM-MET-2013-20) dated 31 March 2019;
- Annual Emission Report (FDDM-MET-2013-20-R1) dated 29 August 2023;
- Associated Amendments of an Environmental Authorisation (Ref no: EMS/1(a),1(k)1(o),23(c),25,1(c),1(e),10),1(p)/08/80) ;
- Declaration from RMM for waste dated June and July 2024;
- EA (EMS/1(a),1(k)1(o),23(c),25,1(c),1(e),10),1(p)/08/80) dated 25 March 2009;
- Environmental Standards;
- External Audits of EAs/RoDs/EMPrs: Sasol Wax & Solidification: Expansion of Fischer Tropsch Wax Plant (FTWEP) Audit Report by Centre for Environmental Management (CEM) (Reference no: CEM 2019/007) dated July 2019;
- Fischer-Tropsch Wax Expansion Project EMP dated August 2012;
- Health and Safety Standards and Audits;
- 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, 2021);
  - 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.
- Noise exposure verification and assessment for hearing conservation purposes (SEO-245-2023-LL-N) dated 01 February 2024;
- Notification of Change of Contact Details of the Business Representative (Ref: SO-env-1285), dated 08 July 2024;
- PPE Register 2024;
- Procedure for the removal of waste from the SEO Sasolburg Sites (SSP-S-014) dated 01 August 2022;
- Sasol Specifications (SP-20-07) Civil Design Criteria dated November 2013;
- Standard Operating Procedure: Handling of Liquid Wax Spillages (SOLID-S22000-PL-SOP-011) dated 31 October 2021; and
- The Reporting, Investigation and Recording of Environmental Incidents (SSP-S-013) dated 25 July 2019.

### 3.4 ASSESSMENT EVALUATION METHODOLOGY

The consolidated report contains all commitments, which were formulated as part of the original and amended EA and EMPr. Each commitment contained in the audit checklist was assessed by reviewing site documentation, interviewing employees, and undertaking a site inspection. The implementation of the mitigation measures in the EMPr was assessed and the level of compliance rated (compliance categories contained in **Table 3-1**). The compliance of the operations listed in **Section 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: <ul style="list-style-type: none"> <li>— Short term: 0 – 6 months.</li> <li>— Medium term: 6 – 12 months.</li> <li>— Long term: 12 - 18 months</li> </ul>
<b>Not applicable (N/A)</b>	The condition, commitment and/or mitigation measure is not applicable or is to be revised in accordance with current practice.  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.

## 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: EMS/1(a),1(k)1(o),23(c),25,1(c),1(e),10),1(p)/08/80 dated 25 March 2009) and associated Amendments (reference: EMS/1(a),1(k),1(o),23(c),25,1(c), 1(e),1(j), 1(p)/08/80 dated 16 September 2010 and 18 September 2019, Audit Findings**

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
<b>Scope of authorisation</b>				
1.1	Authorisation of the activity is subject to the conditions contained in this document, which conditions from part of the environmental authorisation and are binding on the holder of the authorisation.	N/A	Noted. This condition is noted by the holder of the authorisation.	None.
1.2	The holder of the authorisation 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 authorisation.	C	Sasol as the holder of the authorisation acknowledges that responsibility for ensuring compliance with the EA and provides environmental management awareness training to staff, service providers, contractors and visitors to ensure that everyone employed or acting on their behalf is aware that they need to comply with the EA and the EMPr conditions. Induction training was provided to all staff, service provides, contractors and visitors.  <i>Evidence:</i>	None

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<ul style="list-style-type: none"> <li>Verbal Confirmation</li> <li>Staff and visitors training material and registers</li> <li>Visual Site Observation of staff and visitors training.</li> </ul>	
1.3	The authorised activity may only be carried out at the property/site indicated above.	C	<p>The auditor observed that the authorised activity is carried out at Wax and Solvents at the Sasol One site.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> <li>Google Earth</li> <li>EA (EMS/1(a),1(k)1(o),23(c),25,1(c),1(e),10),1(p)/08/80) dated 25 March 2009</li> </ul>	None
1.4	Any changes to, or deviations from, the project description set out in this authorisation 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 authorisation to apply for further authorisation in terms of the regulations.	N/A	Noted. There were no changes or deviations noted in this audit period.	None
1.5	This environmental authorisation 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 authorisation lapses and a new application for an Environmental Authorisation (EA) must be made.	N/A	<p>Noted. This condition is outside the audit period and refers to a requirement prior to commencement and was therefore not audited.</p> <p>The EA was issued in 2009, and the activity commenced within specified time. The facility was operational during the audit period.</p>	None

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
1.6	The authorisation does not negate the holder of the authorisation's responsibility to comply with any other statutory requirements that may be applicable to the undertaking of the activity.	N/A	Noted. This audit did not cover a legal review of compliance of the FTWEP and SSO with all statutory requirements and whether they were in possession of all the necessary permits, authorisations or any other official documents.	None
<b>Appeal of Authorisation</b>				
1.7	The holder of the authorisation must notify all registered interested and affected parties, in writing and within 7 (seven) calendar days, of the Department's decision to authorise the activity.	N/A	Noted. This condition is outside the audit period and refers to a requirement prior to commencement and was therefore not audited.	None
1.8	The notification referred to in 1.7 must:			
1.8.1	specify the date on which the authorisation was issued;	N/A	Noted. This condition is outside the audit period and refers to a requirement prior to commencement and was therefore not audited.	None
1.8.2	inform the interested and affected party of the appeal procedure provided for in regulation 62; and	N/A	Noted. This condition is outside the audit period and refers to a requirement prior to commencement and was therefore not audited.	None
1.8.3	advise the interested and affected party that a copy of the authorisation and reasons for decision will be furnished on request.	N/A	Noted. This condition is outside the audit period and refers to a requirement prior to commencement and was therefore not audited.	None
<b>Management of the activity</b>				

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
1.9	The provisions of the Environmental Management Plan (EMP) which fulfils the requirement of this authorisation must be compiled and submitted to the Department for approval within 14 (fourteen) calendar days, of the Department's decision to authorise the activity.	N/A	Noted. This condition is outside the audit period and refers to a requirement prior to commencement and was therefore not audited.	None
1.10	The EMP must: -			
1.10.1	contain all the information specified in regulation 385 Section 34; and	C	<p>The EMPr includes the required information as specified in Section 24N (2) and (3) of NEMA (as amended), as well as Section 34 of EIA Regulation 385.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Fischer-Tropsch Wax Expansion Project EMP, dated August 2012</li> </ul>	None.
1.10.2	must specifically allude to detailed descriptions and measures for rehabilitation of the environment after closure of the facility.	C	<p>Section 2.4 of the EMPr alludes to detailed descriptions and measures for rehabilitation of the environment after closure of facility .</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Fischer-Tropsch Wax Expansion Project EMP dated August 2012</li> </ul>	None
1.11	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	Noted. There was no change in ownership and/or project developer in this current audit period.	None
Monitoring				

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
1.12	Records related to compliance/non-compliance with conditions or this authorisation must be kept in good order. Such record 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. Therefore, the reports should be readily available should the Department require them. No request was made by the Department during the audit period for records or documents.  <i>Evidence:</i> <ul style="list-style-type: none"><li>Visual Site Observation</li><li>External Audits of EAs/RoDs/EMPrs: Sasol Wax &amp; Solidification: Expansion of Fischer Tropsch Wax Plant (FTWEP) Audit Report by Centre for Environmental Management (CEM) (Reference no: CEM 2019/007) dated July 2019</li></ul>	None.
1.13	Non-compliance with or any deviation from the conditions of this authorisation 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 24F 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 conditions of the EA were noted during this audit.	None.
<b>Recording and reporting</b>				
1.14.1	The holder of the authorisation must submit an environmental audit report to the Department, once during operation of the facility and once during decommissioning of the facility.			
1.14.1	The environmental audit report must contain the following: <ul style="list-style-type: none"><li>Activity;</li><li>Targets;</li></ul>	C	It was confirmed that the previous external environmental audit report contained the required information.	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	<ul style="list-style-type: none"> <li>Conformance/non-conformance;</li> <li>Performance indicators;</li> <li>Comments</li> </ul>		<p>The required information is also included in the current external environmental audit report.</p> <p><i>Evidence</i></p> <ul style="list-style-type: none"> <li>External Audits of EAs/RoDs/EMPrs: Sasol Wax &amp; Solidification: Expansion of Fischer Tropsch Wax Plant (FTWEP) Audit Report by Centre for Environmental Management (CEM) (Reference no: CEM 2019/007) dated July 2019</li> </ul>	
1.14.2	This environmental audit report must be compiled by an independent auditor.	C	The environmental audit report was completed by an independent auditor, WSP Group Africa (Pty) Ltd.	None.
<b>Commissioning of the Activity</b>				
1.15	Seven (7) days prior written notice must be given to the Department that the activity will commence. The notice must include a date on which it is anticipated that the activity will commence.	N/A	This condition is outside the audit period and refers to a requirement prior to commencement of the construction phase and was therefore not audited.	
<b>1.16 Soil and Ground Water</b>				
1.16.1	Elevated fuel storage tanks must be provided with impermeable floors and bund wall to prevent pollution during accidental spillages. The outflow of the bunded area must be supplied with an wax trap. The bund wall must be of sufficient height to allow for the containment of 110% of the tank volume.	C	<p>The auditor observed that all storage tanks are on impermeable surfaces within a bund. Sasol personnel confirmed that the bunded area was able to contain 110% volume of the largest container stored on site.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> <li>Verbal Confirmation</li> </ul>	None



Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
1.16.2	In the event of spill, it must be cleaned immediately. Any contaminated soil must be removed and disposed of at an appropriate site. All workers must be trained in the correct handling procedures to prevent spillages from occurring.	C	<p>The auditor observed that any potential spills will collect on concreted surfaces therefore the likelihood of groundwater contamination is very low. All spillages are reported and cleaned up in accordance with the Environmental Incident procedure (SSP-S-013).</p> <p>Staff received various forms of training, including the handling of spillages, that is recorded on file and on the online training matrix.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>■ The Reporting, Investigation and Recording of Environmental Incidents (SSP-S-013) dated 25 July 2019</li> <li>■ Visual Site Observation</li> <li>■ Online Training Matrix</li> </ul>	None
1.16.3	Chemicals used for pre-commissioning activities must be disposed of correctly at a permitted site. A qualified waste disposal or chemical cleaning contractor must remove effluent in a safe and environmentally sound manner	N/A	Noted. This condition is outside the audit period and refers to a requirement prior to commencement and was therefore not audited.	None
1.16.4	Chemicals must be stored in such a manner that pollution spills are prevented. Clean up procedures must be in place for potential spillages	N/A	Noted. This condition is outside the audit period and refers to a requirement prior to commencement and was therefore not audited.	None
1.16.5	Used Arge catalyst must go to the station as per normal disposal methods.	N/A	Noted. This condition is outside the audit period and refers to a requirement prior to commencement and was therefore not audited.	None
<b>1.17 Surface Water</b>				

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
1.17.1	All storm water must be routed to the storm water facility.	C	<p>The auditor was informed that all stormwater runoff on site is captured through the stormwater drainage systems and routed to authorised wastewater discharge points for treatment.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>IWWMP (SO-env-1192) dated December 2023</li> <li>Verbal Confirmation</li> </ul>	None.
1.17.2	All building rubble or excavated material that are suspected to be contaminated must be analysed to determine contamination. Contaminated building rubble must be decontaminated prior to disposal or storage.	N/A	The FTWEP facility (Section 2600 & 22000) is currently in operational phase, therefore this condition is considered not applicable.	None.
1.17.3	Clean up measures must be implemented. Workers must be trained in these procedures. Hazardous waste resulting from the clean-up must be disposed of at a hazardous waste disposal site.	N/A	The FTWEP facility (Section 2600 & 22000) is currently in operational phase, therefore this condition is considered not applicable.	None.
1.17.4	Effluent must be routed via the underground gravity sewers to the bio-works for treatment	C	<p>All chemical, industrial and domestic effluent from the FTWEP facilities is routed to Bioworks for treatment and reuse at the Sasol One facility.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>IWWMP ( SO-env-1192) dated December 2023</li> </ul>	None
1.17.5	Spillages must be reported to the Safety, Health and Environmental (SH&E) manager of the business unit and be cleaned immediately	C	Sasol personnel confirmed that all spillages are reported to the SHE specialist to ensure that the spillages is cleaned and the incident is closed out. All business units	None

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<p>have a stand-by SHE representative in case of an incident.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> </ul>	
<b>1.18 Air Quality</b>				
1.18.1	Construction vehicles must be properly maintained to avoid unnecessary emissions.	N/A	The FTWEP facility (Section 2600 & 22000) is currently in operational phase, therefore this condition is considered not applicable.	None.
1.18.2	No equipment causing excessive smoke (above normal standards for specified equipment) must be allowed on site.	N/A	The FTWEP facility (Section 2600 & 22000) is currently in operational phase. Sasol personnel confirmed that there is no equipment on site and this was confirmed during the site audit. Therefore this condition is considered not applicable.	None
1.18.3	Site smoking policy must be adhered to. Smoking huts must be set-up in demarcated areas.	C	<p>The Sasol One site has multiples demarcated areas where smoking is allowed on-site.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	None
1.18.4	Sumps must be designed and managed properly in accordance to Sasol Standards and specifications.	C	<p>The auditor was informed that all existing sumps on site consist of pumps to control water flow within the stormwater system and these are managed in accordance with Sasol standards.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> </ul>	None

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<ul style="list-style-type: none"> <li>Sasol Specifications (SP-20-07) Civil Design Criteria dated November 2013</li> </ul>	
1.18.5	Emission from stack must adhere to legal point source compliance standards.	C	<p>Emissions in the Wax and Solvents division, including those from Section 2600 and Section 2200, have been confirmed to be in compliance with the requirements of the AEL.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>AEL (FDDM-MET-2013-20) dated 31 March 2019</li> <li>Annual Emission Report (FDDM-MET-2013-20-R1) dated 29 August 2023</li> </ul>	None
<b>1.19 Access</b>				
1.19.1	There is an already existing access road to the proposed site.	C	<p>The Auditor observed that the existing access road to the site is used.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	None.
<b>1.20 Noise</b>				
1.20.1	All machinery must be maintained to reduce noise levels.	C	<p>The auditor was informed that all plants and machinery are regular inspected. FTWEP has areas demarcated for single hearing and others for double hearing protection.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> <li>Verbal Confirmation</li> </ul>	None

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
1.20.2	Labourers must be provided with hearing protection.	C	It was observed that employees are required to wear required noise protection PPE when work was conducted in a noisy environment.  <i>Evidence:</i> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	None
1.20.3	All attempts must be made to keep noise levels to a minimum (not exceeding 85dB) during construction.	C	Sasol personnel confirmed that all operations meet noise standard requirements. Employees are required to wear noise protection PPE when work was conducted in a noisy environment.  <i>Evidence:</i> <ul style="list-style-type: none"> <li>Noise exposure verification and assessment for hearing conservation purposes (SEO-245-2023-LL-N) dated 01 February 2024</li> </ul>	None
1.20.4	Engineering control measures must be investigated in order to eliminate or reduce noise at its source, or the modification of the routes by which noise reaches workplaces. During the construction phase neighbours must be informed of potential noise increases.	N/A	The FTWEP facility (Section 2600 & 22000) is currently in operational phase, therefore this condition is considered not applicable.	None
<b>1.21 Traffic</b>				
	All the analysed key intersections have sufficient spare capacity to accommodate the additional development traffic without the need for upgrading or improvements.	N/A	Noted	None
<b>1.22 Solid Waste</b>				

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
1.22.1	Waste must be disposed of properly and in a legal manner.	C	<p>Spent catalyst containing some wax from Section 2600 is collected by an external service provider, who reprocesses the catalyst and returns the recovered wax to Sasol. Additionally, Section 2600 generates general waste, such as paper and bags, which are collected by an authorized waste service provider for disposal.</p> <p>In Section 22000, the waste produced includes general waste, pallets, dirty wax, and brown paper, all of which are also collected by an authorized waste service provider.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Interwaste wax paper bags and waste catalyst residue manifests</li> <li>Verbal Confirmation</li> <li>Declaration from RMM for waste dated June and July 2024</li> </ul>	None
1.22.2	During the demolition process, the services of an analytic contamination team must be made use of.	N/A	The FTWEP facility (Section 2600 & 22000) is currently in operational phase, therefore this condition is considered not applicable.	None
<b>1.23 Safety and Security</b>				
1.23.1	The area will be provided with relevant warning signage (e.g. No smoking and open fire extinguisher).	C	<p>It was observed during the site assessment that warning and safety signs are present at FTWEP Section 2600 and Section 22000.</p> <p><i>Evidence:</i></p>	None

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	
<b>1.24 Rehabilitation</b>				
1.24.1	A rehabilitation plan must be compiled and should form part of the Environmental Management Plan for approval by this department.	N/A	The FTWEP facility (Section 2600 & 22000) is currently in operational phase, therefore this condition is considered not applicable.	None
<b>General</b>				
1.25	A copy of this authorisation must be kept at the property where the activity will be carried on. The authorisation must be produced to any authorised official of the Department who requests to see it and must be made available for inspection by any employee or agent of the holder of the authorisation who works or undertakes work at the property.	C	<p>The auditor observed that a copy of the authorisation was available at the senior manager's office and on the Sasol SAPEC (intranet).</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	None
1.26	Where any or the applicant's contact details change, including the name of the responsible person, the physical or postal address and/or telephonic details, the applicant must notify the Department as soon as the new details become known to the applicant	C	<p>The auditor noted, based on the site-wide notification dated 08 July 2024, that the Department was informed of the change of the accountable person from "Mr. Rightwell Laxa", to:</p> <p>Ntokozo Gcabashe ntokozo.gcabashe@sasol.com 016 960 2007</p> <p><i>Evidence:</i></p>	None

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<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>	
1.27	The holder of the authorisation must notify the Department, in writing, within 7 (seven) days if a condition of this authorisation is not adhered to. Any notification in terms of this condition must be accompanied by reasons for the non-compliance.	N/A	Noted. No non-conformance to conditions in the authorisation were identified during the current audit period.	None
<b>4. Findings</b>				
a)	Spillages must be reported to the Safety, Health and Environmental manager and be cleaned up immediately	N/A	Noted. It was confirmed that there were no spillages reported during the current audit period.	None.
b)	Effluent must be recycled and the rest must be routed to bio-works for treatment	C	<p>All chemical, industrial and domestic effluent from the FTWEP facilities is routed to Bioworks for treatment and reuse at the Sasol One facility.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>IWWMP (SO-env-1192), December 2023</li> </ul>	None
c)	Any contaminated soil must be removed and disposed of at an appropriate site. Chemicals must be stored in a manner that will prevent pollution spills	N/A	<p>Noted. It was confirmed that there were no spillages reported during the audit period.</p> <p>The auditor observed that all chemicals are stored on an impermeable surface within a bunded area to prevent ground pollution,</p>	None.
	ii) Clean up procedures must be in place for potential spillages	C	The auditor observed that any potential spills will collect on concreted surfaces therefore the likelihood of	None



Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<p>groundwater contamination is very low. All spillages are reported and cleaned up in accordance with the Environmental Incident procedure (SSP-S-013) and handling of liquid wax spillages (SOLID-S22000-PL-SOP-011).</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>■ The Reporting, Investigation and Recording of Environmental Incidents (SSP-S-013) dated 25 July 2019</li> <li>■ Standard Operating Procedure: Handling of Liquid Wax Spillages (SOLID-S22000-PL-SOP-011) dated 31 October 2021</li> <li>■ Visual Site Observation</li> </ul>	
	iii Used Arge must go to the steam station as per normal disposal method"	N/A	Noted. The auditor was informed that used arge was applicable to the construction phase and not the current operational phase. Therefore, this condition is not applicable. w	None.
d)	Existing road must be used	C	<p>The Auditor observed that the existing access road to the site is used.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>■ Visual Site Observation</li> </ul>	None.
e)	Emission from stack must adhere to legal point source compliance standards. During construction no equipment causing excessive smoke must be allowed on site.	C	<p>Emissions in the Wax and Solvents division, including those from Section 2600 and Section 2200, have been confirmed to be in compliance with the requirements of the AEL.</p> <p><i>Evidence:</i></p>	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<ul style="list-style-type: none"> <li>AEL (FDDM-MET-2013-20) dated 31 March 2019</li> <li>Annual Emission Report (FDDM-MET-2013-20-R1) dated 29 August 2023</li> </ul>	
f)	Waste must be disposed of properly and legal manner	C	<p>Spent catalyst containing some wax from Section 2600 is collected by an external service provider, who reprocesses the catalyst and returns the recovered wax to Sasol. Additionally, Section 2600 generates general waste, such as paper and bags, which are collected by an authorized waste service provider for disposal.</p> <p>In Section 22000, the waste produced includes general waste, pallets, dirty wax, and brown paper, all of which are also collected by an authorized waste service provider.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Interwaste wax paper bags and waste catalyst residue manifest</li> <li>Verbal Confirmation</li> <li>Declaration from RMM for waste dated June and July 2024</li> </ul>	None



## 4.2 ENVIRONMENTAL MANAGEMENT PROGRAMME

**Table 4-2** below provides the compliance of Sasol with the conditions within the EMP that were included in the EMP for FTWEP (Section 2600 and Section 22000) at the Sasol Wax and Solvents on the Sasol One site in Sasolburg, dated August 2012.

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

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMP Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
Employment								
1.	The operators of the new plants will be taught new skills.	N/A	The FTWEP facility (Section 2600 & 22000) is currently in operational phase and considered not new, therefore this condition is considered not applicable.	N/A	None	N/A	N/A	N/A
Cleaning of Equipment								
2.	Ensure that properly marked containers or places are provided which will be adequate and suitable for storage of chemicals. It must then within a reasonable time be disposed of in a responsible manner at a permitted site.	C	During the audit, it was noted that Section 22000 does not store any chemicals on site. However Section 2600 has a designated area for storage of chemicals. The disposal is handled by an	N/A	None	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			authorised waste service provider..					
3.	Ensure correct exposure control and personal protection.	C	<p>The auditor reviewed the PPE register and confirmed that all Sasol personnel, including all contractors and employees handling hazardous materials, are provided with the necessary PPE. SSO policies and procedures requires that all contractors and service providers wear the correct PPE before allowed to enter the Sasol One site.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>■ PPE Register 2024</li> <li>■ Visual Site Observation</li> </ul>	N/A	None	N/A	N/A	N/A
4.	Ensure availability of MSDS's for the relevant chemicals.	C	<p>The auditor observed the relevant MSDS's for FTWEP Section 2600 and Section 22000 during the site audit.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>■ Visual Site Observation</li> </ul>	N/A	None	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
5.	When recycling, ensure correct handling and safe temporary storage methods on impervious surfaces.	C	<p>The auditor was informed that FTWEP recycles recovered wax and spent catalyst which is utilised in thermal co-processing for cement production.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> </ul>	N/A	None	N/A	N/A	N/A
6.	Ensure that cleaning is done within contained area and on an impervious surface	C	<p>The auditor observed that cleaning on the FTWEP facilities is done within a bunded and concreted area to prevent pollution.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	N/A	None	N/A	N/A	N/A
7.	Effluent routed to bioworks	C	<p>All effluent on site is routed to Bioworks in accordance with the IWWMP.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> </ul>	N/A	None	N/A	N/A	N/A
Off-loading								

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)
8.	Off-loading only takes place inside contained area	C	<p>The auditor observed that catalyst is offloaded on an impermeable surface inside the plant area.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	N/A	None	N/A	N/A	N/A
9.	Spill control measures are in place	C	<p>All spillages are reported and cleaned up in accordance with the Environmental Incident procedure (SSP-S-013) and Handling of Liquid Wax Spillages (SOLID-S22000-PL-SOP-011). Moreover, there are spill kits on site in case of such an event.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>The Reporting, Investigation and Recording of Environmental Incidents (SSP-S-013) dated 25 July 2019</li> <li>Standard Operating Procedure: Handling of Liquid Wax Spillages (SOLID-S22000-PL-</li> </ul>	N/A	None	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			SOP-011) dated 31 October 2021 ■ Visual Site Observation					
10.	Emergency plan and auditing are in place and implemented	C	Emergency preparedness plan and credible scenarios for each emergency are kept on file in the administration office .  <i>Evidence:</i> ■ Visual Site Observation	N/A	None	N/A	N/A	N/A
11.	Ensure personnel tasked with offloading are properly trained	C	Staff receive various forms of training, including for offloading, handling of spillages etc., that is recorded on file and on the online training matrix .  <i>Evidence:</i> ■ The Reporting, Investigation and Recording of Environmental Incidents (SSP-S-013) dated 25 July 2019 ■ Visual Site Observation ■ Online Training Matrix	N/A	None	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
Vessels								
12.	Monitoring of employee's exposure to emissions during start-up	N/A	Noted. While the regulations under the Occupational Health and Safety Act are being followed, Sasol Operations conducts Health and Safety audits as per the statutory requirements.	Sasol is recommended to amend the EA to omit this condition as it pertains to safety measures and not environmental measures.  <i>Timeframe:</i> ■ Medium Term	None	N/A	N/A	N/A
13.	All employees should be issued with applicable PPE	C	The auditor reviewed the PPE register and confirmed that all Sasol personnel, including all contractors and employees handling hazardous materials, are provided with the necessary PPE. SSO policies and procedures requires that all contractors and service providers wear the correct PPE before allowed to enter the Sasol One site.	N/A	None	N/A	N/A	N/A



Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			<i>Evidence:</i> <ul style="list-style-type: none"> <li>PPE Register 2024</li> <li>Visual Site Observation</li> </ul>					
14.	Sumps must be designed and managed properly in accordance to Sasol Standards and specifications	C	<p>The auditor was informed that all existing sumps on site consist of pumps to control water flow within the stormwater system and are managed in accordance with Sasol standards.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> <li>Sasol Specifications (SP-20-07) Civil Design Criteria dated November 2013</li> </ul>	N/A	None	N/A	N/A	N/A
<b>Emissions</b>								
15.	Measures such as Flare Gas Recovery will be investigated outside the scope of this project	N/A	Noted. No measures were required to be investigated during the audit period.	N/A	None	N/A	N/A	N/A
16.	Increased flaring under upset conditions, will be handled as environmental incidents according to current procedures	C	The auditor was informed that there was no increased flaring during the current audit period. All	N/A	None	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			<p>incidents are handled in accordance with the Reporting, Investigation and Recording of Environmental Incidents procedure (SSP-S-013).</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>The Reporting, Investigation and Recording of Environmental Incidents (SSP-S-013) dated 25 July 2019</li> </ul>					
17.	NOx and Dust - plans to mitigate new facility- dust into filter.	N/A	<p>Emissions in the Wax and Solvents division, including those from Section 2600 and Section 2200, have been confirmed to be in compliance with the requirements of the AEL.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>AEL (FDDM-MET-2013-20) dated 31 March 2019</li> </ul> <p>Annual Emission Report (FDDM-MET-2013-20-R1) dated 29 August 2023</p>	N/A	None	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
18.	All new tanks must be designed in accordance with South African standards and the requirements of the National Environmental Management Air Quality Act (Act 39 of 2004)	C	Sasol personnel confirmed the auditor that all existing tanks are designed in accordance with South African standards and the requirements of the National Environmental Management Air Quality Act (Act 39 of 2004).  <i>Evidence:</i> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> </ul>	N/A	None	N/A	N/A	N/A
19.	Ensure correct valve and flange types are used as per design	C	Sasol personnel confirmed that the correct valve and flange types are utilised as per design. The auditor observed these during the site audit.  <i>Evidence:</i> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> <li>Visual Site Observation</li> </ul>	N/A	None	N/A	N/A	N/A
<b>Loading/off-loading</b>								
20.	Storage in bags	C	The auditor observed the products that are stored in bags in a designated area on site.	N/A	None	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			Evidence: ■ Visual Site Observation					
21.	Off loading inside contained area. Spill control measures are in place	C	The auditor observed that catalyst is offloaded on an impermeable surface inside the plant area.  Evidence: ■ Visual Site Observation	N/A	None	N/A	N/A	N/A
22.	Emergency plan is in place and implemented. Auditing is in place and implemented	C	An emergency preparedness plan and credible scenarios for each emergency are kept on file in the administration office .  Evidence: ■ Visual Site Observation	N/A	None	N/A	N/A	N/A
23.	Ensure personnel tasked with offloading are properly trained	C	Staff received various forms of training, including for the offloading and handling of spillages etc., that is recorded on file and on the online training matrix.  Evidence:	N/A	None	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			<ul style="list-style-type: none"> <li>The Reporting, Investigation and Recording of Environmental Incidents (SSP-S-013) dated 25 July 2019</li> <li>Visual Site Observation</li> <li>Online Training Matrix</li> </ul>					
Nitrogen Blanketing								
24.	Where applicable Nitrogen blanketing will be used in tanks to minimize releases of emission	C	<p>The auditor was informed that there is nitrogen blanketing within the tanks to minimise potential emissions.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	N/A	None	N/A	N/A	N/A
25.	All relieve valves will be routed to LP flare system where applicable	C	<p>Sasol personnel confirmed that there is a safety valve installed in case the plant system is under pressure to allow releases to the flare system.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> </ul>	N/A	None	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			<ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>					
<b>Storage</b>								
26.	Storage of feed material in designated are (i.e. tanks, hoppers, warehouses)	C	<p>The feed material is routed through the piping system. Feed catalyst is the only material that is stored in bags located in a designated area.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	N/A	None	N/A	N/A	N/A
27.	Catalyst to be stored in bags in dedicated area and hoppers	C	<p>Feed catalyst was observed to be stored in bags in a designated area.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	N/A	None	N/A	N/A	N/A
28.	Product and by-product to be stored in designated areas	C	<p>The auditor observed that the product and by-products are stored in bags in a dedicated area.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	N/A	None	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
<b>Disposal</b>								
29.	Existing Sasol Emergency procedures to be followed	C	An emergency preparedness plan and credible scenarios for each emergency are kept on file in the administration office .  <i>Evidence:</i> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	N/A	None	N/A	N/A	N/A
30.	In the event of a spill, it should be reported to the Safety Health and Environmental (SH&E) manager of the business unit and be cleaned immediately. Any contaminated soil should be removed and disposed of at an appropriate site.	N/A	Noted. There was no spill event noted during the audit period.	N/A	None	N/A	N/A	N/A
31.	Disposal via reputable waste removal company	C	Sasol's waste is disposed by an authorised waste service provider. The auditor viewed various waste manifest and safety disposal certificates.  Waste disposal is conducted in accordance with the procedure for the	N/A	None	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			removal of waste from the SEO Sasolburg Sites (SSP-S-014). <i>Evidence:</i> <ul style="list-style-type: none"> <li>Procedure for the removal of waste from the SEO Sasolburg Sites (SSP-S-014) dated 01 August 2022</li> </ul>					
<b>Stormwater Management</b>								
32.	All storm water to be routed to the storm water facility	C	All stormwater on site is considered 'dirty water' and therefore routed through the stormwater systems to Bioworks. <i>Evidence:</i> <ul style="list-style-type: none"> <li>IWWMP (SO-env-1192) dated December 2023</li> <li>Verbal Confirmation</li> </ul>	N/A	None	N/A	N/A	N/A
33.	Effluent to be recycled as far as possible and the rest to be routed to bioworks for treatment	C	All chemical, industrial and domestic effluent from the FTWEP facilities is routed to Bioworks for treatment and reuse at the Sasol One facility.	N/A	None	N/A	N/A	N/A

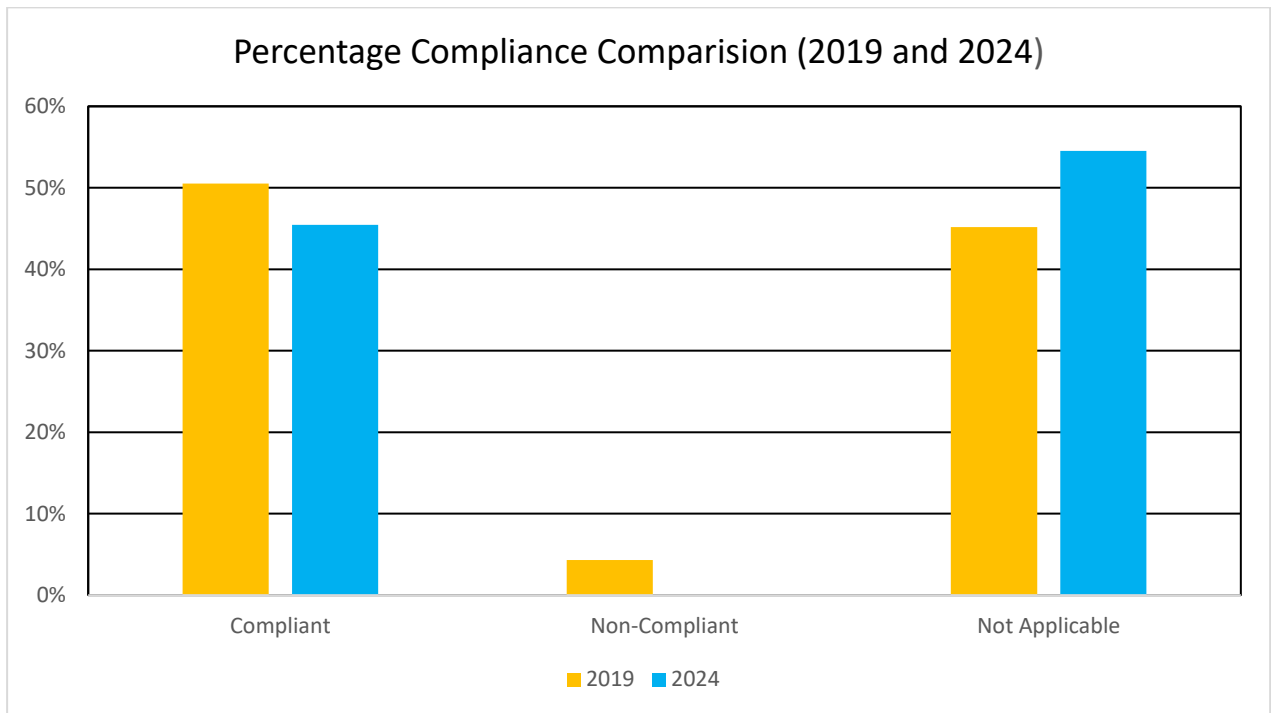


Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			<i>Evidence:</i> <ul style="list-style-type: none"> <li>IWWMP ( SO-env-1192) dated December 2023</li> </ul>					
34.	Change-over plan to be develop for first start-up	N/A	The FTWEP facility (Section 2600 & 22000) is currently in operational phase, therefore this condition is considered not applicable.	N/A	None	N/A	N/A	N/A
<b>Liquid Effluent</b>								
35.	Effluent to be recycled as far as possible, and the rest to be routed to bio-works for treatment.	C	All chemical, industrial and domestic effluent from the FTWEP facilities is routed to Bioworks for treatment and reuse at the Sasol One facility.  <i>Evidence:</i> <ul style="list-style-type: none"> <li>IWWMP ( SO-env-1192) dated December 2023</li> </ul>	N/A	None	N/A	N/A	N/A
<b>Flaring</b>								
36.	Change-over plan to be developed for first start-up	N/A	The FTWEP facility (Section 2600 & 22000) is	N/A	None	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			currently in operational phase, therefore this condition is considered not applicable.					
Rehabilitation								
37.	Environmental impacts will be remediated, as per the internal Sasol One site procedure for reporting environmental incidents (SSP-S-013). A detailed rehabilitation plan will be drafted prior to the demolition of the facility.	N/A	The FTWEP facility (Section 2600 & 22000) is currently in operational phase, therefore this condition is considered not applicable.	N/A	None	N/A	N/A	N/A
38.	Financial provision will be made by Sasol Wax if environmental impacts arise from the operations that cannot be addressed in the short-term. This is done in accordance with the internal procedure (SSP-S-046)	N/A	This condition is noted by the holder of the EA.	N/A	None	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 zero non-compliant conditions.



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

**Table 5-1 – Progress against previous findings**

Ref	Commitment	2019 Status	2019 Finding	2024 Status	2024 Finding
<b>EA Conditions</b>					
<b>1.17 Surface Water</b>					
1.17.2	All building rubble or excavated material that are suspected to be contaminated must be analysed to determine contamination. Contaminated building	NC	At the time of the audit, no evidence could be obtained of any arrangements in place to ensure that building rubble is analysed to determine contamination.	N/A	The FTWEP facility (Section 2600 & 22000) is currently in operational phase, therefore this condition is considered not applicable.

Ref	Commitment	2019 Status	2019 Finding	2024 Status	2024 Finding
	rubble must be decontaminated prior to disposal or storage.		It is noted that Sasol Ltd is in the process of amending this specific condition (see Internal Audit Action Plan 2019).  (Only applicable to Section 22000)		
<b>Management of the activity</b>					
1.11	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.	NC	During the audit evidence was found that the Environmental Authorisations (EA) had been amended on 4 April 2019 to reflect the new location, the owner of the EA in 2017, Mr Louis Fourie, as well as a number of other amendments. Evidence was also found that Sasol notified the DESTEA on 16 January 2019 (LetterSO-env-450) that Mr Rightwell Laxa, have been appointed as Senior Vice President Sasolburg Operations, with effect from 1 February 2019 and that he will assume all responsibilities and accountabilities associated with the EAs that were issued by the DESTEA, including this EA. Although this is in compliance with the condition of the Environmental Authorisation, the 2014 EI A regulations (GNR 982) requires a Part 1 amendment to the EA, where the amendment relate to a change of ownership or transfer of rights and obligations. This had not been done at the time of the audit.  (Only applicable to Section 2600)	N/A	Noted. There were no changes in ownership and/or project developer of the EA noted in this audit period.
<b>1.17 Surface Water</b>					
1.17.2	All building rubble or excavated material that are suspected to be contaminated must be analysed to determine	NC	At the time of the audit, no evidence could be found of any arrangements in place to ensure that building rubble or excavated <i>material is</i>	N/A	The FTWEP facility (Section 2600 & 22000) is currently in operational phase, therefore this

Ref	Commitment	2019 Status	2019 Finding	2024 Status	2024 Finding
	contamination. Contaminated building rubble must be decontaminated prior to disposal or storage.		<i>analysed to determine contamination.</i> This requirement is not included in the Sasolburg Site Procedure SSP-S-014 procedure for the Removal of Wastes from the Sasolburg Operations sites. Evidence was found that corrective action has been formulated that still needs to be implemented, i.e. amend the EMPr. Evidence was also found of communication with DESTEA regarding their agreement on the appropriate public participation process required for the amendment of Environmental Management Plans. In similar communication with the DEA, the agreement has been received, but the agreement from the DESTEA is still outstanding, despite the first communication that was submitted in February 2019. (Only applicable to Section 2600).		condition is considered not applicable.
1.17.2	Clean up measures must be implemented. Workers must be trained in these procedures. Hazardous waste resulting from the clean-up must be disposed of at a hazardous waste disposal site.	NC	At the time of the audit, evidence was found that chemical spills are identified as emergencies that would require responses that involve the clean-up of chemical spills, reporting of environmental incidents and disposal of hazardous waste in the Area Emergency Response Plan for Synthesis B S2600 (ERP/ SYN B (Rev 02). However, the plan does not include any chemical spill scenario that would require environmental related emergency response. As training on emergency response procedures at wax synthesis is primarily done through emergency response simulations/exercises, the absence of a chemical spill scenario means that workers are also not trained in emergency spill clean-up procedures, as required by	N/A	The FTWEP facility (Section 2600 & 22000) is currently in operational phase, therefore this condition is considered not applicable.

Ref	Commitment	2019 Status	2019 Finding	2024 Status	2024 Finding
			condition 1.17.3 (Surface water) of the EA.  (Only applicable to Section 2600)		
<b>EMPr Conditions</b>					
<b>Loading/off-loading</b>					
22.	Emergency plan is in place and implemented. Auditing is in place and implemented	NC	At the time of the audit, evidence was found that chemical spills are identified as emergencies that would require responses that involve the clean-up of chemical spills, reporting of environmental incidents and disposal of hazardous waste in the Area Emergency Response Plan for Synthesis B S2600 (ERP/ SYN B (Rev 02). However, the plan does not include any chemical spill scenario that would require environmental related emergency response and is therefore not implemented from an environmental perspective. This is non-compliance against the commitment regarding product/by-product loading/off-loading that an emergency plan is in place and implemented.  (Only applicable to Section 2600)	C	Emergency preparedness plan and credible scenarios are kept on file in the administration office at the for each emergency.

## 6 SUMMARY OF THE AUDIT FINDINGS

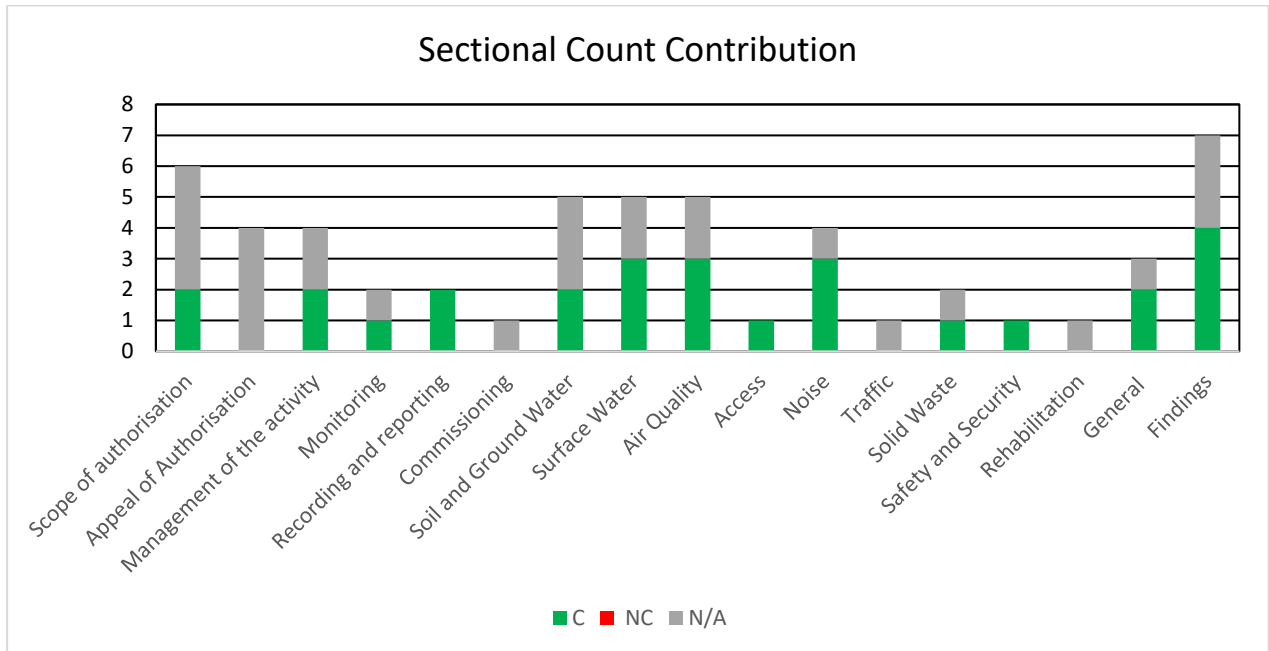
### 6.1 SASOL SASOLBURG FTWEP EA COMPLIANCE

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.

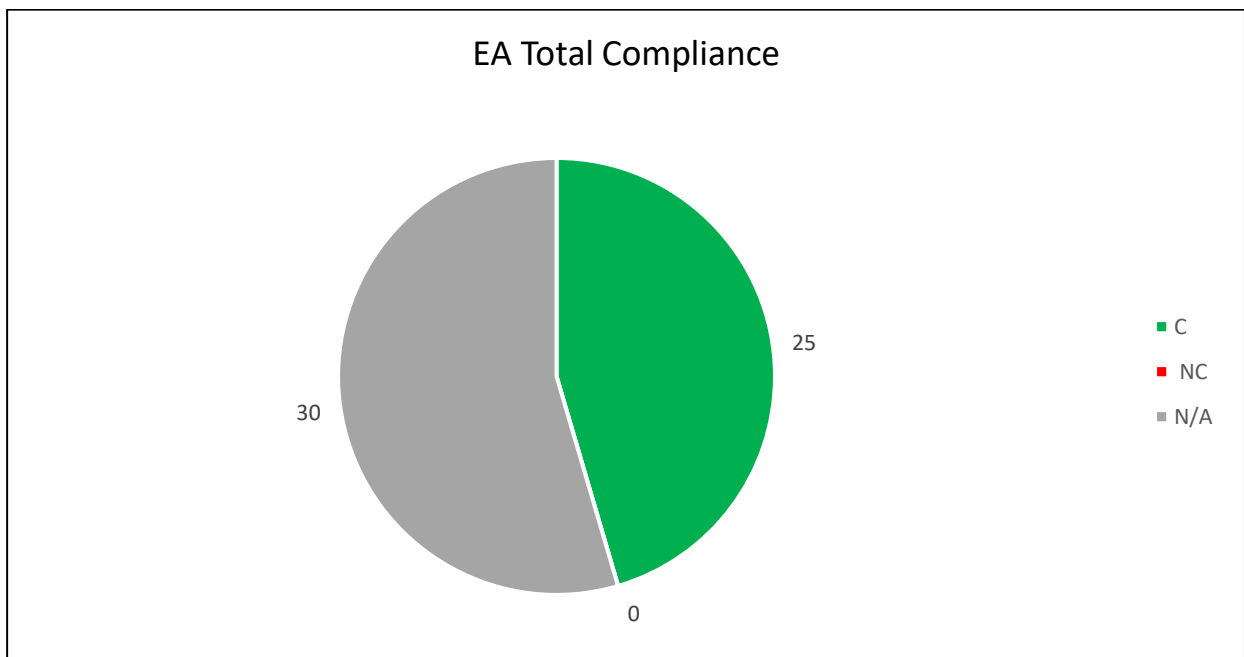
**Table 6-1 - Summary of EA Compliance Audit Findings**

Section of the EA	No. Commitments	C	NC	N/A
Scope of authorisation	6	2	0	4
Appeal of Authorisation	4	0	0	4
Management of the activity	4	2	0	2
Monitoring	2	1	0	1
Recording and reporting	2	2	0	0
Commissioning	1	0	0	1
Soil and Ground Water	5	2	0	3
Surface Water	5	3	0	2
Air Quality	5	3	0	2
Access	1	1	0	0
Noise	4	3	0	1
Traffic	1	0	0	1
Solid Waste	2	1	0	1
Safety and Security	1	1	0	0
Rehabilitation	1	0	0	1
General	3	2	0	1
Findings	8	4	0	3
Total	55	25	0	30
Total Percentage		45%	0%	55%
Percentage Compliance with Applicable Conditions	100%			

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



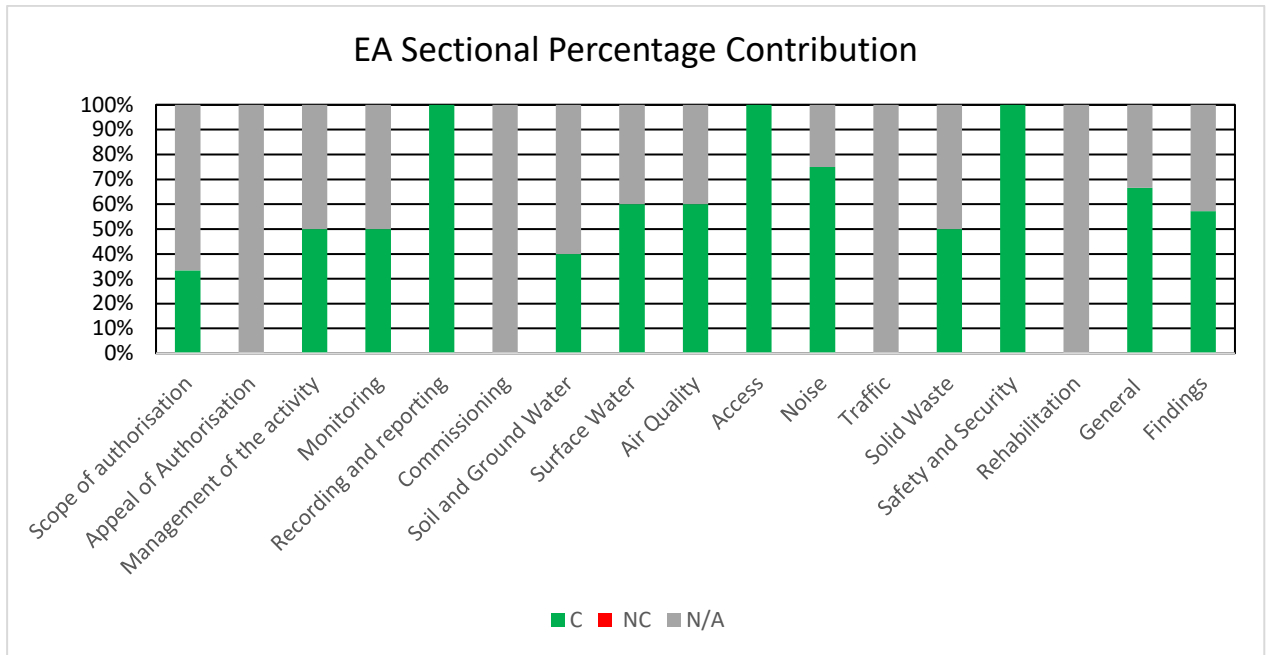
**Figure 6-1 - Number/Count contribution of findings made to the EA conditions per section**



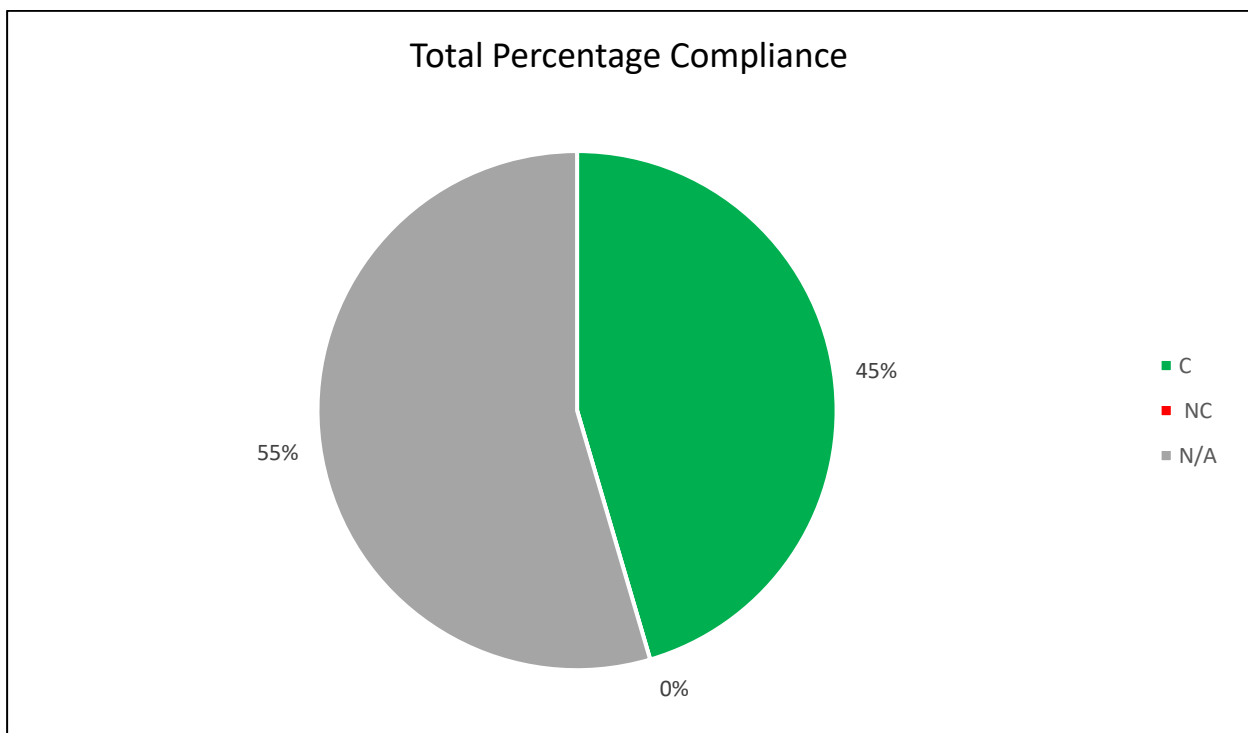
**Figure 6-2 - Overall count findings on compliance to the EA commitments**

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





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



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

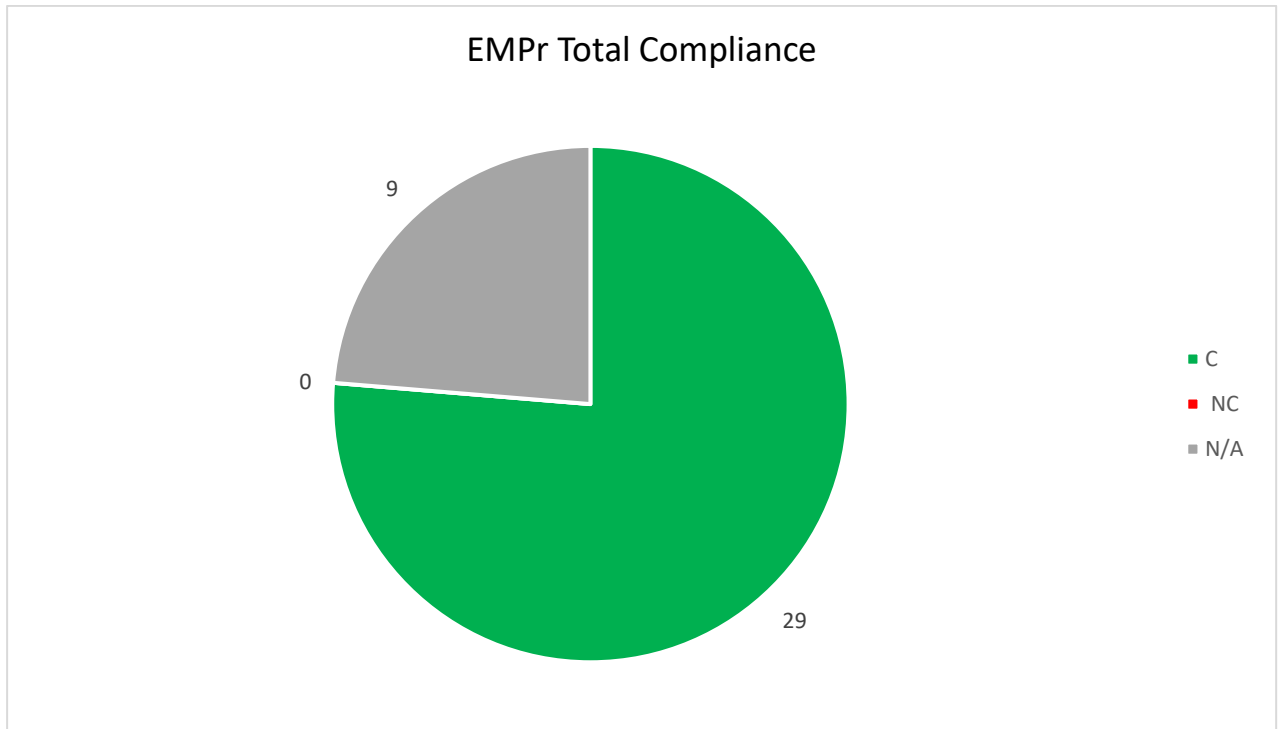
## 6.2 SASOL SASOLBURG FTWEP EMPR COMPLIANCE

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.

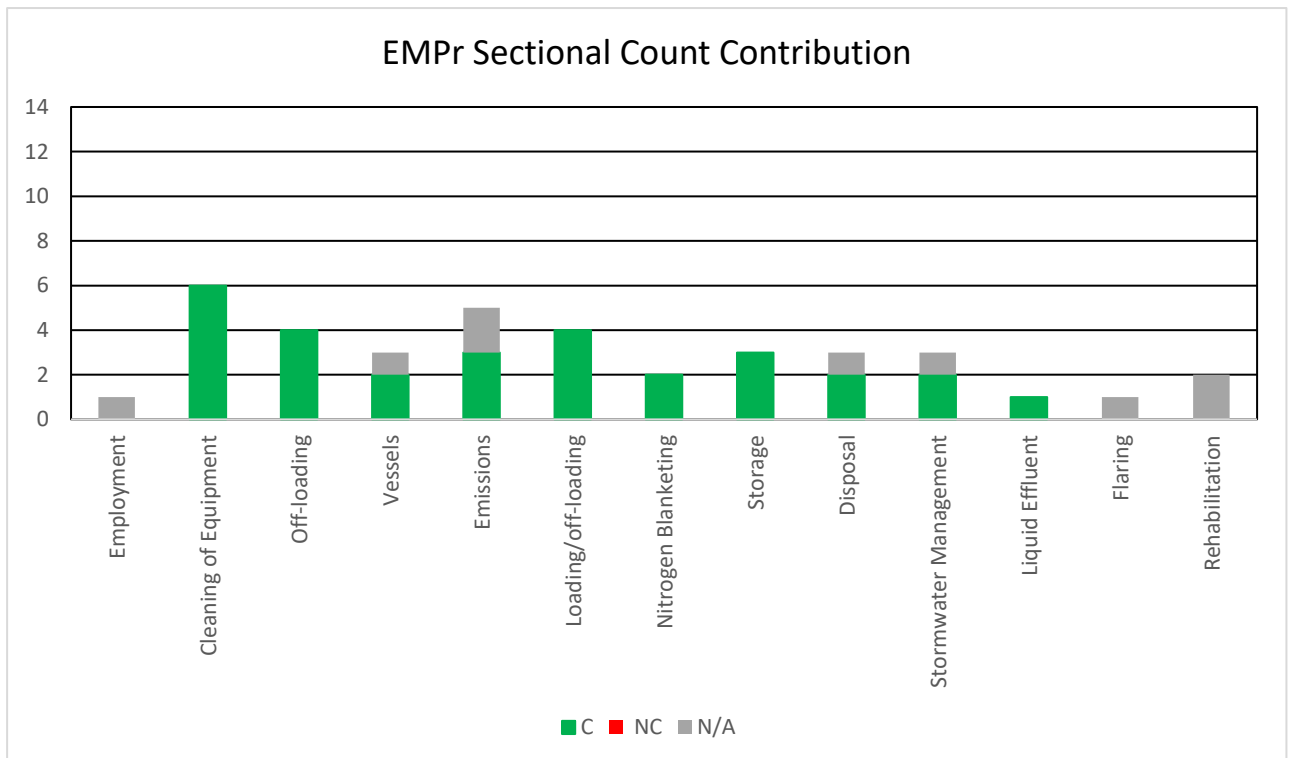
**Table 6-2 - Summary of EMPr Compliance Audit Findings**

Section of the EMPr	No. Commitments	C	NC	N/A
Employment	1	0	0	1
Cleaning of Equipment	6	6	0	0
Off-loading	4	4	0	0
Vessels	3	2	0	1
Emissions	5	3	0	2
Loading/off-loading	4	4	0	0
Nitrogen Blanketing	2	2	0	0
Storage	3	3	0	0
Disposal	3	2	0	1
Stormwater Management	3	2	0	1
Liquid Effluent	1	1	0	0
Flaring	1	0	0	1
Rehabilitation	1	0	0	2
Total	38	29	0	9
Total Percentage		76%	0%	24%
Percentage Compliance with Applicable Conditions	100%			

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

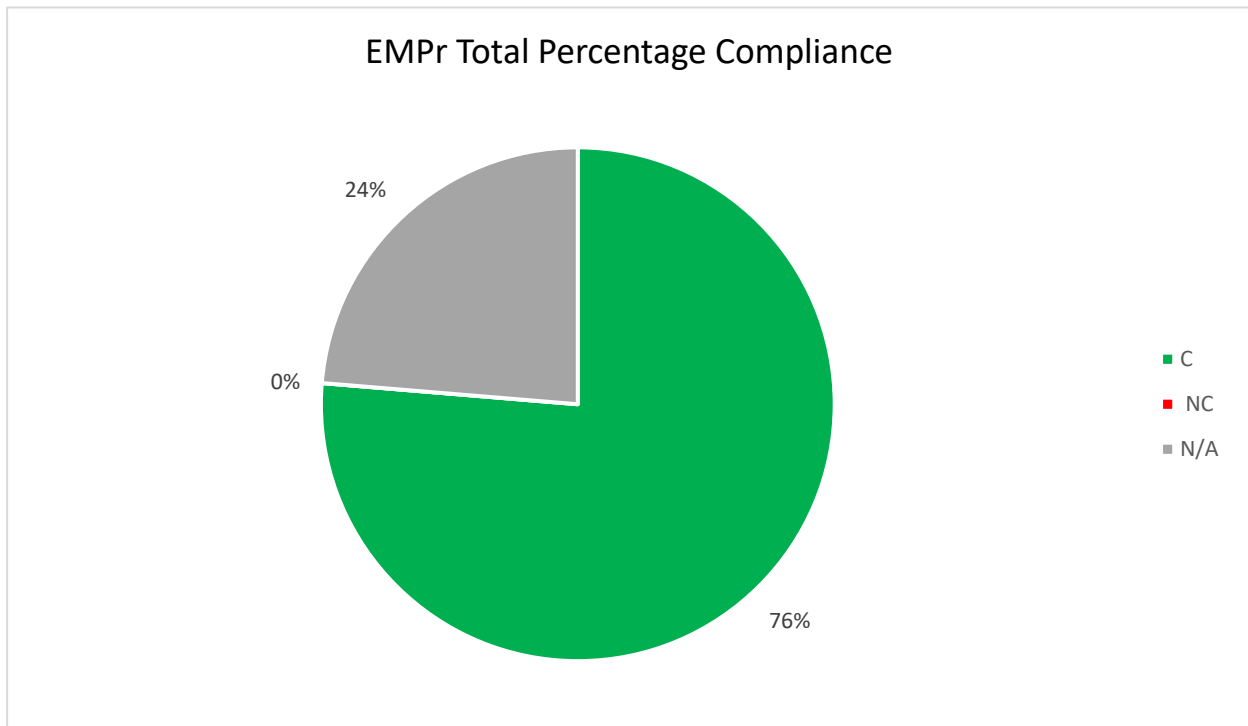


**Figure 6-5 - Overall count findings on compliance to the EMPr Commitments**

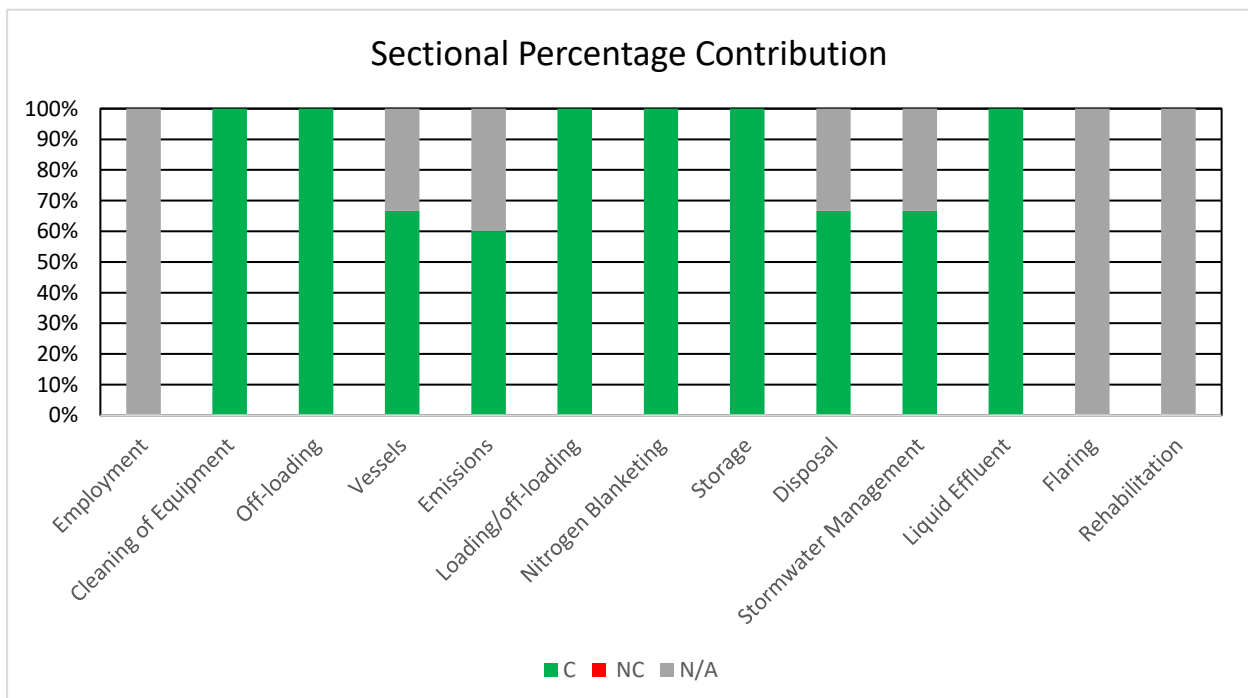


**Figure 6-6 - Number/Count contribution of findings made to the EMPr Commitments per Section**

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



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



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

## 7 RECOMMENDATIONS

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

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

## 8 EFFECTIVENESS OF THE EMPR

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

Signed at \_\_\_\_\_Midrand\_\_\_\_\_ on this the \_\_\_\_\_06 November\_\_\_\_\_2024

\_\_\_\_\_  
SIGNATURE OF INDEPENDENT AUDITOR

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

# Appendix A

## AUDITOR CVS







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

**wsp.com**

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## Annexure B

### 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
<b>1. Cleaning of equipment</b>	1.1 Cleaning of Equipment Groundwater soil surface water pollution prevention through proper disposal of chemicals	1.1.1 Ensure that properly marked containers or places are provided which will be adequate and suitable for storage of chemicals
		1.1.2 Chemical waste must be disposed of in a responsible manner at a permitted site
		1.1.3 Ensure correct exposure control and personal protection
		1.1.4 Ensure availability of MSDS for relevant chemicals
		1.1.5 When recycling, ensure correct handling and safe temporary storage methods on impervious surfaces
	1.2 Management of water used when cleaning equipment. Prevent incorrect disposal of effluents	1.2.1 Ensure that cleaning is done within contained area and on an impervious surface
		1.2.2 Effluent routed to bio works
<b>2. Off-loading (feed, catalyst)</b>	2.1 Prevent and contain spillages during off-loading	2.1.1 04. 1.) Off-loading only takes place inside contained area
		2.1.2 04. 2. Spill control measures are in place
		2.1.3 04. 3. Emergency plan and auditing are in place and implemented
		2.1.4 04. 4 Ensure personnel tasked with offloading are properly trained
<b>3. Draining of vessels during shut down Draining of effluent to sump causing</b>	3.1 Draining of Vessels Sumps must be designed and managed properly;	3.1.1 Monitoring of employee's exposure to emissions during start-up
		3.1.2 Sumps must be designed and managed properly in accordance

<b>vapours</b>	identify, evaluate and eliminate if necessary	with Sasol Standards and specifications
<b>4. Filling up Vessels Displacement of air/nitrogen</b>	4.1 Purging of Vessels Identify, evaluate and eliminate if necessary	4.1.1 Monitoring of employees' exposure to emissions during start-up
		4.1.2 All employees should be issued with the applicable PPE
<b>5. Purging of vessels during shutdowns</b>	5.1 Venting to atmosphere Identify evaluate and eliminate if necessary	5.1.1 Monitoring of employee's exposure to emissions during start-up
		5.1.2 All employees should be issued with applicable PPE
<b>6. Venting of vessels under positive pressure during shutdown</b>	6.1 Venting of vessels Identify evaluate and eliminate if necessary	6.1.1 Monitoring employee's exposure to emissions during start-
		6.1.2 All employees should be issued with applicable PPE
<b>7. Emissions to atmosphere from flare</b>	7.1 Venting to atmosphere from flare /Identify evaluate and eliminate if necessary	7.1.1 Increased flaring under upset conditions, will be handled as environmental incidents according to current procedures
<b>8. Fugitive emissions from compressors, valves and other equipment</b>	8.1 Emissions to atmosphere/Identify, evaluate and eliminate if necessary	8.1.1 All new tanks must be designed in accordance with South African standards and the requirements of the National Environmental Management Air Quality Act (Act 39 of 2004)
		8.1.2 Ensure correct valve and flange types are used as per design
<b>9. Product/by-product loading and off loading</b>	9.1 Identify, evaluate and eliminate if necessary	9.1.1 Storage in bags
		9.1.2 Offloading inside contained area. Spill control measures are in place
		9.1.3 Emergency plan is in place and implemented. Auditing is in place and implemented
		9.1.4 Ensure personnel tasked with offloading are properly trained
<b>10. Nitrogen blanketing in tanks</b>	10.1 Identify, evaluate and eliminate if necessary	10.1.1 Where applicable Nitrogen blanketing will be used in tanks to minimize releases of emission
<b>11. Relieve valves</b>	11.1 Emissions to atmosphere/Identify, evaluate and eliminate if necessary	11.1.1 All relieve valves will be routed to LP flare system where

		tify, evaluate and eliminate if necessary	applicable
<b>12. Storage (feed, catalyst, product, by product)</b>	12.1	Groundwater soil surface water pollution prevention through Incorrect storage	12.1.1 Storage of feed material in designated are (i.e. tanks, hoppers, warehouses)
			12.1.2 Catalyst to be stored in bags in dedicated area and hoppers
			12.1.3 Product and by-product to be stored in designated areas
<b>13. Disposal (catalyst, product, by product)</b>	13.1	Disposal in an Environmentally responsible manner	13.1.1 Existing Sasol Emergency procedures to be followed
			13.1.2 In the event of a spill, it should be reported to the Emergency management.
			13.1.3 Disposal via reputable waste removal company
<b>14. Stormwater management</b>	14.1	Contaminated stormwater not disposed of / routed correctly	14.2 1All storm water to be routed to the storm water facility
<b>15. Testing of equipment</b>	15.1	Management of used water	15.2 All storm water to be routed to the storm water facility
<b>16. Liquid effluent</b>	16.1	Liquid effluent not disposed of correctly	16.2 1Effluent to be recycled as far as possible and the rest to be routed to bio works for treatment