



Our reference: SO-ENV-1328

29 November 2024

Your Ref: E/03/16

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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.

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

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

Attached, please find the compliance audit report for the establishment of the Oxidation Capacity Expansion Project, Environmental Authorisation with reference E/03/16, dated October 2024.

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 Oxidation Capacity Expansion Project.

Yours faithfully,

Signed by: Johann Van Wyk
Signed at: 2024-11-29 11:03:37 +02:00
Reason: I approve

Johann Van Wyk

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Annexure A

Audit report.

Oxidation capacity expansion – ref E/03/16



Sasol South Africa Ltd

**OXIDATION CAPACITY EXPANSION PROJECT
(REF. NO: E/03/16) AMENDED ENVIRONMENTAL
AUTHORISATION AND ENVIRONMENTAL
MANAGEMENT PROGRAMME AUDIT**

Compliance Audit Report: November 2019 - July
2024





Sasol South Africa Ltd

OXIDATION CAPACITY EXPANSION PROJECT (REF. NO: E/03/16) AMENDED ENVIRONMENTAL AUTHORISATION 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

OXIDATION CAPACITY EXPANSION PROJECT (REF. NO: E/03/16) AMENDED ENVIRONMENTAL AUTHORISATION AND ENVIRONMENTAL MANAGEMENT PROGRAMME AUDIT

Compliance Audit Report: November 2019 - July 2024

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AUDITOR CVS

1 INTRODUCTION

1.1 TERMS OF REFERENCE

WSP Group Africa (Pty) Ltd (WSP) as an independent auditor was appointed by Sasol Chemicals, a division of Sasol South Africa Limited, to undertake an external environmental compliance audit of the commitments contained in the Amended Environmental Authorisation (EA) (reference number E/03/16) of the Oxidation Capacity Expansion (OCE) Project 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 (initially Record of Decision (RoD)), the amendment of the EA and the EMPr audited for compliance of the OCE Project are provided below:

- RoD for the OCE in Sasolburg (reference number: E/03/16), dated 23 September 2003 by the Department of Tourism, Environmental and Economic Affairs now the Department of Economic, Small Business Development, Tourism and Environmental Affairs (DESTEA).
- The first amendment of the EA on the OCE Project (on the Sasol One site) in Sasolburg (reference number: E/03/16), dated 29 March 2018 by the DESTEA. The amendments include:
 - Brief description of the activity
 - Location of project
 - Applicant details:
 - Contact person
 - Contact numbers.
 - Address
- The second amendment of the EA on the OCE Project on the Sasol One site) in Sasolburg (reference number: E/03/16), dated 14 August 2020 by the DESTEA. The amendments include:
 - Change of the specific condition of the EA
 - Change the applicant details on the EA;
 - Accountable person of the EA
 - Company name
- EMPr included in the Scoping Report dated 29 August 2003.

1.2 PROJECT DESCRIPTION - OXIDATION CAPACITY EXPANSION

The hydrogenated wax is used as feed for the production of oxidised wax. The current facility has three operating reactors for this purpose. One reactor was replaced with a new larger reactor (D1678). The decommissioned reactor (D1676) was however not removed since it may be used again in future. By this replacement the capacity of the plant can be increased from 2250 tpa to approximately 3000 tpa. Apart from the new reactor a new centrifugal pump will be installed. Additional pipelines were required for the transportation of the feed materials and utilities to the new reactor. The wax is fed to the reactor and air is introduced by means of a sparger to commence the

oxidation reaction. During the reaction the temperature is maintained at 175°C. Upon completion of the reaction a mixture of lithium hydroxide (LiOH) is introduced to saponify the oxidised wax. This addition is however only done to 50% of the product. The final product is transferred from the reactor to road tankers by pressurising with nitrogen.

DESCRIPTION OF SUBSTANCE INVOLVED

Different grades of hard waxes will be oxidized in the expanded oxidation plant. These waxes are non-hazardous of nature. Air is used as the oxidizing agent.

Lithium hydroxide (LiOH), which is used to saponify the wax, is the only hazardous substance used in the process. The Material Safety Data Sheet of a typical hard wax. **Figure 1-1** illustrates the current operations at OCE.

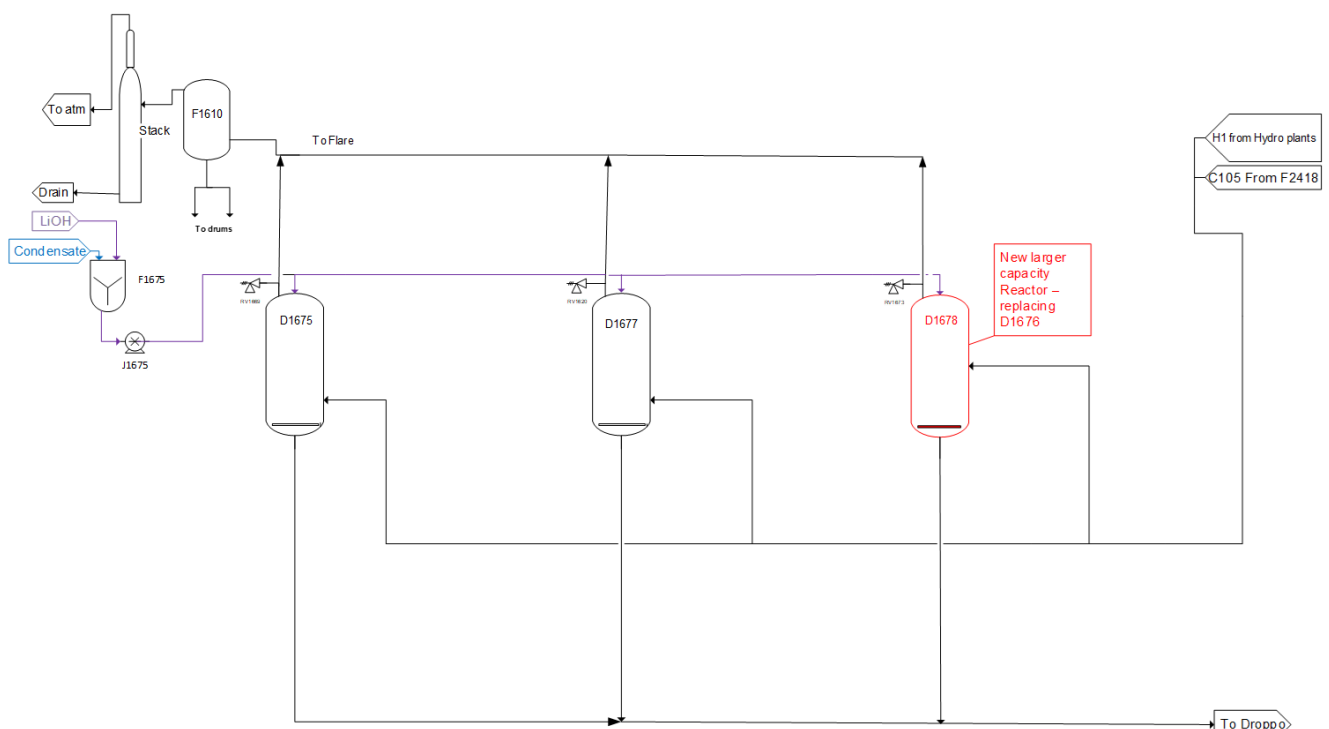


Figure 1-1 - Process of the OCE unit

1.3 PROJECT TEAM

Matilda Mbazo and Yvette Mmanasoe completed a site inspection of the Oxidation Capacity Expansion Project against the EA conditions (reference: E/03/16) at the Sasol One Site on **15 July 2024**

The draft external audit report was compiled in July 2024 and finalised in August 2024. This report will be submitted to the DETSEA by Sasol in December 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 8 years' experience in environmental audits in different mining companies, compilation of ESIAs, application EAs, water use licenses, Section 24 G, Mining Rights and Prospecting Rights.

2 AUDIT SCOPE

WSP was appointed by Sasol to conduct the environmental compliance audit for the OCE facility at the Sasol One site, Sasolburg. This report provides an overview of the level of compliance with the conditions contained in the EA and EMPr as indicated in **Section 1.1**. The site audit was undertaken on **15 July 2024** at the Sasol One Site, Sasolburg Plant.

The objective of the audit was to:

- Assess the level of compliance with the commitments of the EA for the OCE project;
- Assess the level of compliance with the commitments of the EMPr that was submitted as part of the Scoping Report for the licencing of the expansion of the OCE project, as agreed and approved by DESTEA;
- Assess the extent to which the avoidance, management and mitigation measures provided for in the EMPr for the OCE project 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 OCE project. Regulation 34, of the EIA Regulations, provides for the auditing of an environmental authorisation, EMPr and closure plan. Furthermore, **Appendix 7** of Government Notice Regulation (GNR) 982 outlines the required audit report content. The 2014 Regulations, as amended, refer to a minimum audit frequency of five years. This audit is designed to meet the requirements of Regulation 34 of the EIA Regulations, 2014. **Table 2-1** indicates where the requirements of Section 34 and **Appendix 7** are met within this audit report.

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

Sub-Section	Requirement	Report Section Reference
34 (2)a	The environmental audit report must be prepared by an independent person with the relevant environmental auditing expertise.	Sub-section 1.2 and CVs provided in Appendix A
34(2)b	The environmental audit report must provide verifiable findings, in a structured and systematic manner, on: (i) the level of performance against and compliance of an organisation or project with the provisions of the requisite environmental authorisation or EMPr and, where applicable, the closure plan; and (ii) the ability of the measures contained in the EMPr, and where applicable the closure plan, to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity;	Audit checklist tables provided in Section 4
3(a)	The environmental audit report must determine (a) the ability of the EMPr, and where applicable the closure plan, to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an ongoing basis and to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility; and	Section 4
3(b)	The environmental audit report must determine the level of compliance with the provisions of environmental authorisation, EMPr and where applicable, the closure plan.	Section 4
4(a)	Where the findings of the environmental audit report indicate: (a) insufficient mitigation of environmental impacts associated with the undertaking of the activity (b) insufficient levels of compliance with the environmental authorisation or EMPr the holder must, when submitting the environmental audit report to the competent authority submit recommendations to amend	Section 4

Sub-Section	Requirement	Report Section Reference
	the EMPr or closure plan in order to rectify the shortcomings identified in the environmental audit report	
a	Details of- (i) the independent person who prepared the environmental audit report; and (ii) the expertise of independent person that compiled the environmental audit report.	Sub-section 1.2 CVs provided in Appendix A
b	A declaration that the independent auditor is independent in a form as may be specified by the competent authority.	Sub-section 9
c	An indication of the scope of, and the purpose for which, the environmental audit report was prepared.	Sub-section 1.1 and Section 2
d	A description of the methodology adopted in preparing the environmental audit report.	Section 3
e	An indication of the ability of the EMPr, and where applicable, the closure plan to- (i) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis; (ii) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility; and (iii) ensure compliance with the provisions of environmental authorisation, EMPr, and where applicable, the closure plan.	Section 4
f	A description of any assumptions made, and any uncertainties or gaps in knowledge.	Sub-sections 0 and 2.2
g	A description of any consultation process that was undertaken during the course of carrying out the environmental audit report.	Sub-section 3.2
j	A summary and copies of any comments that were received during any consultation process.	None received
k	Any other information requested by the competent authority.	None requested

2.1 DISCLAIMER

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

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

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

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

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

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

2.2 ASSUMPTIONS AND LIMITATIONS

WSP noted the following assumptions and limitations during the audit:

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

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

3 AUDIT METHODOLOGY

The International Organisation of Standardisation (ISO) 14010, ISO 14011 and ISO 14012 guideline documents were utilised as a template during the compliance audit process. This methodology

ensures that the compliance audit was conducted in a systematic and independent manner that was documented and objectively evaluated to determine compliance to the EA commitments.

The audit process comprised the following:

- Confirmation of the audit checklist;
- Site inspection (**15 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 **15 July 2024** where findings and observations were recorded and are summarised in **Section 4**. Key personnel interviewed during the audit included:

- Suyen Van Zyl - SHE: Environment Specialist;
- Mandla Lehloo – Area Manager; and
- Petro De Bruin – Production Administrator.

3.3 INFORMATION CONSIDERED

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

- Amendments of the Environmental Authorisation (E/03/16) dated 29 March 2018 and 14 August 2020;
- Environmental Authorisation (E/03/16) dated 23 September 2003;
- HAZOP Study for Oxidation Cooling Capacity Expansion dated 19 December 2001;
- Incidents register;
- 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.

- Notification of Change of Contact Details of the Business Representative (Ref: SO-env-1285) dated 08 July 2024;
- Online Induction Training;
- Sweepings Delivery Notes dated 20 March and 14 July 2024; and
- Training Matrix.

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

4 AUDIT FINDINGS

4.1 ENVIRONMENTAL AUTHORISATION

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

Table 4-1 - Environmental Authorisation (reference: E/03/16 dated 23 September 2003), Amendment (reference: E/03/16 dated 29 March 2018), and Amendment (reference: E/03/16 dated 14 August 2020) Audit Findings

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
Brief Description of the Activity				
	<p>Sasol Wax, a business unit of Sasol Limited currently produces oxidised wax as one of their products. The current plant has three existing reactors for the production of oxidised wax. It is proposed to increase the current capacity of the plant by installing a new reactor.</p> <p>This will result in a capacity increase from 2250 tpa to approximately 3000 tpa.</p> <p>The following equipment will be involved:</p> <ul style="list-style-type: none"> ■ The installation of a new reactor; ■ The installation of a new centrifugal pump for steam condensate supply to the new reactor; ■ Additional piping. 	C	<p>The Auditor was informed that the OCE project activity description has not changed along with the equipment and utilities utilised as stated in the EA.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> ■ Verbal Confirmation ■ Visual Site Observation ■ EA (E/03/16) 	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	<ul style="list-style-type: none"> Substances involved; Different grades of hard wax (non-hazardous); Air for oxidising; Lithium hydroxide (LiOH) to saponify the wax (hazardous substance). <p>The following utilities will be required for the proposed project:</p> <ul style="list-style-type: none"> Plant air- Available on site; Instrument air - Available on site; Nitrogen - Available on site; Steam - Available on site; Condensate - Available on site; Electricity - Available on site; Storm water sewers - Available on site. 			
Location				
	The proposed expansion is proposed to be installed at Section 1600 on the Sasol One site in Sasolburg.	C	<p>The auditor observed that the operating OCE project is located in Section 1600 at Sasol One site in Sasolburg, Free State Province.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation Google Earth 	None.
Applicant				

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	Mr. Rightwell Laxa , SVP Sasolburg Operations, Sasol South Africa Ltd acting through its Sasolburg Operations, P. O. Box 1, SASOLBURG, 1947, Tel: +27 16 960 8001	C	<p>Based on the information provided, the accountable person and the contact details was changed from “Mr. Rightwell Laxa”, to the following:</p> <p>Ntokozo Gcabashe ntokozo.gcabashe@sasol.com 016 960 2007</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Notification of Change of Contact Details of the Business Representative (Ref: SO-env-1285) dated 08 July 2024. 	None.
Site Visit				
	Danie Krynauw from' this department accompanied by Adele Meyer from Environmental and Risk Engineering! did a visual inspection of the site and surrounding area on 28 August 2003.	N/A	Noted. No Department visits have been conducted to date.	None.
Decision				
	In terms of Section 22 of the Environment Conservation Act, 1989 (Act No. 73 of 1989) the, MEC: Tourism, Environmental and Economic Affairs hereby grants authorisation for the execution of the activity described above, subject to the conditions of approval contained in this Record of Decision.	N/A	Noted. The RoD was granted on 23 September 2003 and a few conditions were amended on 29 March 2018 and 14 August 2020.	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	<p>In addition to the above authorisation, exemption from compliance with the following regulation of Regulation No. 1183, dated 5 September 1997 is hereby granted by the MEC: Tourism, Environmental and Economic Affairs in terms of Section 28A, Regulation 3(1): The applicant - :</p> <p>(a) must appoint an independent consultant who must on behalf of the applicant comply with these regulations;</p> <p>(c) must ensure that the consultant has no financial interest in the undertaking of the proposed activity, except to the compliance with these regulations;</p> <p>(d) must ensure that the consultant, while complying with these regulations has -</p> <p>(i) expertise in the area of environmental concern being dealt with in the specific application;</p> <p>(ii) the ability to perform all the relevant tasks contemplated in these regulations;</p> <p>(iii) the ability to manage the public participation process contemplated in paragraph (f);</p> <p>(iv) the ability to timeously produce thorough, readable and informative documents;</p> <p>(v) adequate recording and reporting systems to ensure the preservation of all data gathered; and</p>			

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	<p>(vi) a good working knowledge of all relevant policies, legislation, guidelines, norms and standards.</p> <p>(e) must ensure that the consultant provides to the relevant authority access to, and opportunity for review of, all procedures, underlying data, reports and interviews with interested parties, whether or not such information may be reflected in a report required in terms of these regulations;</p> <p>(*in so far as where no consultant is appointed, the applicant must ensure access to the above information).</p>			
Specific Conditions				
1.	This authorisation has been granted solely for the purpose of undertaking the specified activity referred to above.	N/A	Noted. The Auditor audited the authorisation that was granted for the specified activity (OCE Project).	None.
2.	The applicant of the facility the facility must confirm to the mitigation measures as complied by Sasol Technology (Point 7.2 of the Scoping Report: Environmental impact assessment of the Oxidation Capacity Expansion Project) dated 29 August 2003, to ensure that all precautionary measures are followed during the construction and operation of the facility.	C	<p>This audit report serves as a confirmation of compliance of the applicant against section 7.2 of the Scoping Report: Environmental impact assessment of the OCE Project.</p> <p>A HAZOP study was conducted in December 2001 pre-construction of the OCE to ensure adherence to safety procedure.</p> <p><i>Evidence:</i></p>	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	Specifically, to ensure good practice especially during the pre-construction and construction phases, a Sasol Hazard and Operability Analysis (HAZOP) or risk assessment study conducted during pre-construction and operational phases to ensure that the whole project adhere to safety procedures.		<ul style="list-style-type: none"> HAZOP Study for Oxidation Cooling Capacity Expansion dated 19 December 2001 	
3.	It is the responsibility of the applicant and the contractor on site to prevent any surface (stormwater) pollution.	C	<p>The OCE facility is located within a concrete bund with a clean and contaminated stormwater management system and an emergency response control plan in place at the SSO site. The SSO has an onsite water management system to control stormwater, and a water treatment management system to control and manage contaminated stormwater or effluent. Sasol One Site is an industrial area, and protocols were in place to ensure no effect and impact on the surface and groundwater.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation; Verbal Confirmation; and IWWMP (report number: SO-env-929, December 2021) 	None.
4.	In case of non-compliance with regulations the burden of proof rests with the applicant and/or the relevant contractor.	N/A	Noted. This condition is noted by the applicant.	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
5.	The Department hereby confirms that an audit of compliance with procedures mentioned in 2, and 3 above can be conducted at any time.	N/A	Noted.	None.
General Conditions				
6.	This Authorisation Is granted in terms of Section 28A of the Environment Conservation Act, 1989 (Act No. 73 of 1989) and does not exempt the holder from compliance with other relevant Legislation.	N/A	Noted. This audit scope did not cover a legal review of compliance of the OCE and Sasol with all statutory requirements and whether they were in possession of all the necessary permits, authorisations or any other official documents.	None.
7.	The applicant must advertise this Record of Decision to notify interested and affected parties of this authorisation and their right to appeal against the Record of Decision, within 30 days from the approval date of the ROD.	N/A	Noted. The advertisement of the RoD was considered for the pre-construction and construction phase; this condition is outside the audit period and therefore was not audited.	None.
8.	The authorised activity, including site preparation, may not commence before the statutory 30-day appeal period expires. The 30-day appeal period starts from the date of advertising this Record of Decision.	N/A	The ROD was granted on 23 September 2003 and conditions were amended on 29 March 2018 and 14 August 2020. This condition is outside the audit period and refers to a requirement prior to commencement and was therefore not audited.	None.
9.	This authorisation refers only to the project specified and described in this Record of Decision.	C	The auditor confirmed that the approved authorisation refers to the project specified in the ROD. <i>Evidence:</i>	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	<p>a. Changes in the proposal resulting in significant environmental impacts are only permissible if approved in writing by the Department.</p> <p>b. The Department reserves the right to amend and review the conditions of authorisation every 5 years.</p>		<ul style="list-style-type: none"> EA (E/03/16) 	
10.	The Department must be notified, within 30 days thereof, of any change of ownership and/or project developer. Conditions imposed in this Record of Decision must be made known to the new owner and/or developer and are binding on the new owner and/or developer.	N/A	Noted. No change of ownership/project developer has been noted in the audit period.	None.
11.	The Department must be notified of any change of address of the owner and/or developer.	C	<p>The Department was notified about the change of the applicant and representative details; this was not a new owner. Changes in the details are provided below: Ntokozo Gcabashe ntokozo.gcabashe@sasol.com 016 9602007</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Notification of Change of Contact Details of the Business Representative (Ref: SO-env-1285) dated 08 July 2024. 	None.
12.	The conditions of the authorisation should be brought to the attention of all persons (employees,	C	Sasol has mandatory safety and environmental training and induction before commencement of any	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	sub-consultants etc.) associated with the undertaking of this activity to bind such persons to these conditions.		<p>work by staff, contractors, service providers or visitors. The WSP contracted auditors were also required to undertake an induction training prior the site audit.</p> <p>The employees training, including the EA and EMPr awareness training, is regulated through a Sasol Matrix training system.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation; Training Matrix; and Online Induction Training. 	
13.	The owner and/or developer must notify the relevant authority, in writing, within 24 hours thereof if any condition of this authorisation is not adhered to.	N/A	<p>Noted. The conditions of the exemption (EA) were adhered to and protocols to address onsite non compliances and implement corrective actions were in place. These are recorded on Sasol's internal electronic SHE management system. No significant environmental incidents occurred during the audit period.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Onsite Observation Verbal communication Incidents register 	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
14.	Proof of compliance with the conditions described in the Record of Decision must be forwarded to the Department one week prior to the commencement of construction or operation of the development (as appropriate).	N/A	Noted. This condition is outside the audit period and refers to a requirement prior to commencement and was therefore not audited.	None.
15.	Records related to compliance/ non-compliance with conditions of this authorisation 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	Noted. The Auditor noted that the records were kept in good condition onsite, therefore, should be readily available should the Department require them. No request was made by the Department during the audit period for records or documents. <i>Evidence:</i> <ul style="list-style-type: none">■ Onsite Observation■ Verbal communication	None.
16.	Non-compliance with or any deviation from the conditions of this authorisation as set out in the Record of Decision is regarded as an offence, and after reasonable provision has been given for remedial action, will be dealt with in terms of Section 29, 30 and 31A of the Environment Conservation Act (Act No. 73 of 1989) as well as any other appropriate legal mechanisms.	N/A	Noted. This audit confirmed that there has not been any deviation from the conditions set out in the authorisation documentation.	None.
17.	The applicant shall be responsible for all costs necessary to comply with the above conditions unless otherwise specified.	N/A	The applicant noted the condition.	None

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
Key Factors for the Decision				
1.	Public participation was completed to the satisfaction of the Department of Tourism, Environmental, and Economic Affairs.	N/A	Noted. This condition is outside the audit period and refers to a requirement prior to commencement and was therefore not audited	None.
2.	The proposed facility is within the existing industrial area of Sasolburg.	C	<p>The auditor observed that the OCE facility is within the existing industrial area of Sasol One site in Sasolburg.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation Google Earth Imagery 	None.
Duration and Date of Expiry				
	This authorisation shall lapse if the activity does not commence within two years of the date of issue of this authorisation.	N/A	Noted. This condition is outside the audit period and refers to a requirement prior to commencement and was therefore not audited. The OCE facility is currently operational.	None
Appeal				

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	Section 35 of the Environment Conservation Act, 1989 (Act No. 73 of 1989), makes provision for appeal by any person who feels aggravated by a decision made by a relevant authority in terms of; these regulations. "Any person", therefore includes the applicant, interested party or member of the public.	N/A	Noted. This condition is outside the audit period and refers to a requirement pre-commencement of the activity and therefore was not audited.	None.



4.2 ENVIRONMENTAL MANAGEMENT PROGRAMME

Table 4-2 below provides the compliance of Sasol with the conditions within the EMP that were included in the EIA for the Oxidation Capacity Project at the Sasol One site in Sasolburg, dated 29 August 2003.

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)
7.2.1 Land and Soil								
	Any excavated soil will be re-used for backfilling as far as possible.	N/A	Noted. This condition is outside the audit period as it refers to a construction requirement and was therefore not audited. The OCE facility is currently the operational phase.	None.	None.	The condition is not practical as the OCE facility exists, and no further excavations will be required to maintain the facility.	N/A	N/A
	Excess soil will be disposed of at a recognized disposal site	N/A	Noted. This condition is outside the audit period as it refers	None.	None.	The condition is not practical as the OCE facility exists,	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)
			to a construction requirement and was therefore not audited. The OCE facility is currently the operational phase.			and no further excavations will be required to maintain the facility.		
7.2.2 Surface and groundwater								
	During commissioning the new equipment will be cleaned with water. This is done to remove dust from the equipment. This does not pose any threat to the environment since the new equipment is not exposed to any contaminants at this stage. Since no contamination can occur, this water will go to the existing storm water sewers.	N/A	Noted. This condition is outside the audit period as it refers to a construction requirement and was therefore not audited. The OCE facility is currently the operational phase.	None.	N/A	Condition was not practical as equipment was commissioned and in operation.	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 whole existing area is paved and fitted with existing sewers to capture any effluent. The project will therefore have no negative effect on the surface and groundwater quality.	C	<p>The OCE facility is located on an existing concrete paved and bunded facility with fitted with existing sewers that route the effluent to Bioworks. Therefore, there was no negative effect on the surface and groundwater quality as all water on the Sasol One site is considered 'dirty water'.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation Verbal Confirmation 	None.	N/A	N/A	N/A	N/A
7.2.3 Air quality								

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 facility has an existing stack for the release of emissions. It will be able to handle the capacity increase without any modification required. An increase of approximately 15-20 % in emissions is expected. This includes formic acid, alcohols, paraffins, acetic acid and traces of hydrocarbons. The level will however still be within the limits of the current air permit. There will therefore be no significant effect on the air quality as result of this project.	C	<p>The existing stack is monitored annually in accordance with the AEL every August. The 2023 annual report confirms that Sasolburg Operations complied fully with its emission limits contained within its AEL.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> ■ AEL (Ref: FDDM-MET-2013-22) dated 23 August 2023 ■ Annual Emissions Report (FDDM-MET-2013-22-R1) 	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)
			dated 29 August 2023					
7.2.4 Effluents								
7.2.4.1 Liquid effluent								
	Water may be used to wash, and pressure test the pipelines during the PRE-COMMISSIONING phase of the project. This water will be handled by the existing storm water system, as the equipment will be new, and no contamination is expected. The rest of the operation will continue using the existing cleaning procedures.	C	The Auditor was informed that cleaning of the OCE is per the standard operating procedures. <i>Evidence:</i> ■ Verbal Confirmation	None.	N/A	N/A	N/A	N/A
	The manufacturing process itself does not create any by-product	C	The Auditor was informed that the OCE unit does	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)
	effluents that requires disposal.		not generate by-products that require disposal. <i>Evidence:</i> ■ Verbal Confirmation					
7.2.4.2 Solid Effluent								
	Waste generated from the construction processes will be disposed at recognized sites	N/A	Noted. This condition is outside the audit period as it refers to a construction requirement and was therefore not audited. The OCE facility is currently the operational phase.	None.	N/A	Condition was not practical as it refers to the construction phase and OCE is in operation.	N/A	N/A
	No solid waste is produced from the manufacturing process. All packaging material, domestic and other non-hazardous	C	The Auditor was informed that no solid waste is produced from the OCE manufacturing	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 will be disposed of at a licenced landfill.		<p>process. Off-spec product is sold to third parties as 'sweepings and scrap materials is auctioned by Redundant Material Management (RMM).</p> <p>Domestic waste on site is routed by the Hub to either EnviroServ, Interwaste or Averda for disposal at a licenced landfill (Holfontein or Vlaktefontein landfill).</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation Visual Site Observation 					

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"> Sweepings Delivery Notes dated 20 March and 14 July 2024. 					
	In the event of off-spec product it will either be sold as sub-spec product or routed to Natref to be used as fuel: As a last resort it will be disposed of at the existing Sasol One disposal site.	C	<p>The Auditor was informed that the off-spec product is routed to the off-tank regarded as 'sweepings' which are sold and not routed to Natref.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation 	None.	N/A	N/A	N/A	N/A
7.2.5 Fauna and Flora								
	There will be no significant effect on the biological environment as the proposed project is within an existing industrial site.	C	The OCE unit is located in the SSO site which was an industrial area with no biological	None.	N/A	The condition was practical to the OCE unit	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>environment. The entire site was cleared prior to the development of the unit and there was no significant and immediate effect on fauna and flora on site. The unit was in a closed concreated system and there was minimal exposure to fauna and flora.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> ■ Onsite observation ■ Verbal confirmation 					
7.2.6 Visual								
	The proposed plant will be situated within an established	C	The OCE facility is located in the SSO site which is	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)
	industrial area and will therefore not result in any visual impact.		<p>an industrial area with no visual impact to the immediate surrounds.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Onsite observation Verbal confirmation 					
7.2.7 Noise								
	Construction activities are usually, for certain periods, characterise with limited noise pollution. This will however be limited to the construction sites.	N/A	Noted. This condition is outside the audit period as it refers to a construction requirement and was therefore not audited. The OCE facility is currently the operational phase.	None.	N/A	Condition was not practical as it refers to the construction phase and OCE is in operation.	N/A	N/A
7.2.8 Socio-Economic								

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)
	During the construction phase additional labourers will be required. Local on-site contractors will be used	N/A	Noted. This condition is outside the audit period as it refers to a construction requirement and was therefore not audited. The OCE facility is currently the operational phase.	None.	N/A	Condition was not practical as it refers to the construction phase and OCE is in operation.	N/A	N/A
7.2.9 Health, Safety and Risk Assessment								
	An internal SASOL's risk study, namely FMEA (Failure Mode Effect Analysis) will be conducted on the proposed project. This is a study where the whole project and all the equipment involved is reviewed in detail by the engineering design and operation team, and potential failures or departures in the	C	Sasol did not provide proof of the FMEA report or records for the OCE facility. However, the HAZOP was developed prior to the construction and operation of any unit at Sasol. The plant manager and SSO SHE	None.	N/A	The condition was practical to the OCE unit.	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)
	normal mode of operation are assessed.		<p>representative advised that the required safety procedures that were developed to cancel or ameliorate the effects of any failures or onsite malfunctions identified in the study HAZOP were in place and that no failures or malfunctions had occurred at this unit since operation. A safety and maintenance management plan were in place for the OCE.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> HAZOP Study for Oxidation Cooling Capacity 					

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)
			Expansion dated 19 December 2001					
	During the construction phase, strict safety rules will apply for welding / grinding.	N/A	Noted. This condition is outside the audit period as it refers to a construction requirement and was therefore not audited. The OCE facility is currently the operational phase.	None.	N/A	The condition was not practical to the OCE unit.	N/A	N/A
	Contractors working on the site will undergo safety training as per SASOL procedure	N/A	Noted. This condition is outside the audit period as it refers to a construction requirement and was therefore not audited. The OCE facility is currently the operational phase.	None.	N/A	The condition was not practical to the OCE unit.	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)
	Each-contracting company would have a safety representative who will undertake regular inspections of the workplace, to enforce the wearing of protective clothing and to ensure compliance with all relevant safety rule	N/A	Noted. This condition is outside the audit period as it refers to a construction requirement and was therefore not audited. The OCE facility is currently the operational phase.	None.	N/A	The condition was not practical to the OCE unit.	N/A	N/A
	All contractors would furthermore be made aware of the existing emergency procedures and responsibilities where applicable:	N/A	Noted. This condition is outside the audit period as it refers to a construction requirement and was therefore not audited. The OCE facility is currently the operational phase.	None.	N/A	The condition was not practical to the OCE unit.	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)
	All employees would furthermore be made aware of the existing emergency procedures and responsibilities where applicable.	C	<p>Sasol has mandatory safety and environmental training and induction before commencement of any work by staff.</p> <p>The employees training is regulated through a Sasol Matrix training system.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation; Training Matrix. 	None.	N/A	The condition was practical to the OCE unit.	N/A	N/A
	All workers will be trained and will undergo safety training prior to commencing work at the facility	N/A	Noted. This condition was specific to the pre-commissioning phase and was outside the audit	None.	N/A	The condition was not practical to the OCE unit.	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)
			period and therefore was not audited. However, the auditor was informed that all employees undertook induction and safety training.					

5 PROGRESS AGAINST PREVIOUS AUDIT FINDINGS

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

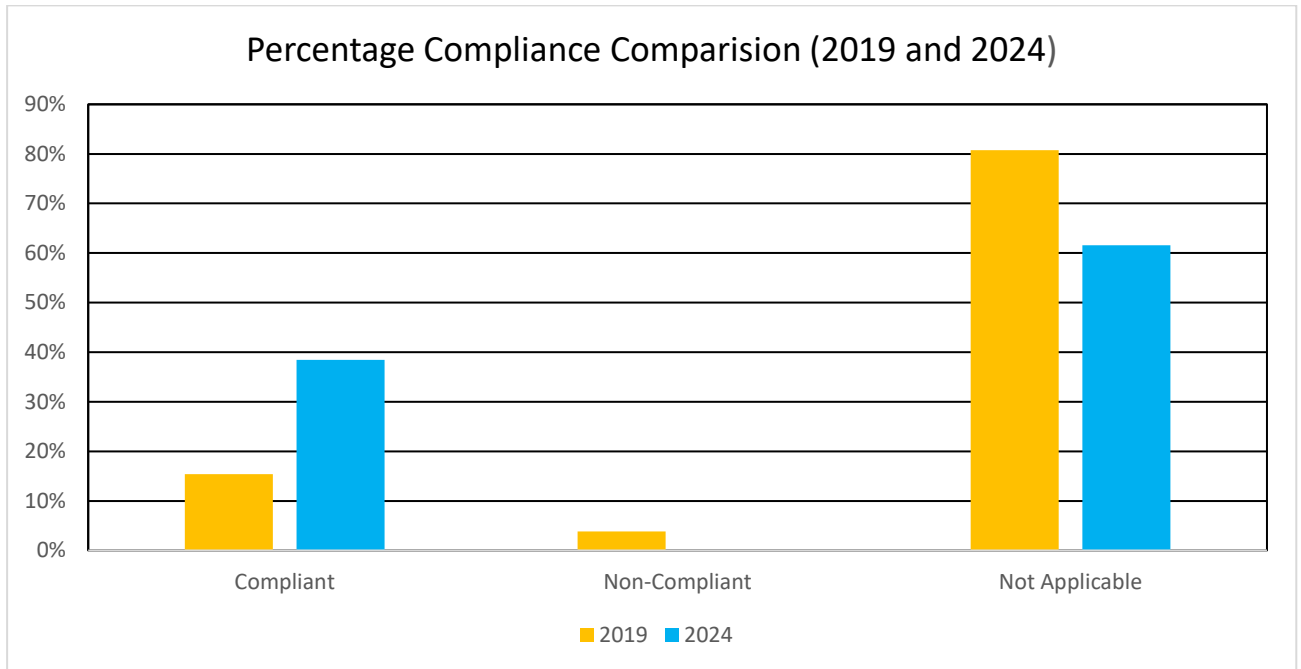


Figure 5-1 – Percentage comparison of Environmental Authorisation compliance levels from 2019 to 2024

Table 5-1 – Progress against previous findings (*TN – Take Note)

Ref	Commitment	2019 Status	2019 Finding	2024 Status	2022 Finding
EA Conditions					
1. Specific Conditions					
2.1.	The applicant of the facility the facility must confirm to the mitigation measures as complied by Sasol Technology (Point 7.2 of the Scoping Report: Environmental impact assessment of the	TN	Not all requirements as set put in the scoping report section 7.2 are complied with.	C	This audit report serves as a confirmation of compliance of the applicant against section 7.2 of the Scoping Report: Environmental impact assessment of the Oxidation Capacity Expansion Project.

Ref	Commitment	2019 Status	2019 Finding	2024 Status	2022 Finding
	<p>Oxidation Capacity Expansion Project) dated 29 August 2003, to ensure that all precautionary measures are followed during the construction and operation of the facility.</p> <p>Specifically, to ensure good practice especially during the pre-construction and construction phases, a Sasol Hazard and Operability Analysis (HAZOP) or risk assessment study conducted during pre-construction and operational phases to ensure that the whole project adhere to safety procedures.</p>				A HAZOP study was conducted in December 2001 pre-construction of the OCE to ensure adherence to safety procedure.
2. General					
10.	The Department must be notified, within 30 days thereof, of any change of ownership and/or project developer. Conditions imposed in this Record of Decision must be made known to the new owner and/or developer and are binding on the new owner and/or developer.	N/C	The name on the authorisation still reflects that of Louis Fourie. The address is outdated.	N/A	Noted. No change of ownership/project developer has been noted in the audit period.
EMPr Conditions					
7.2.3 Air Quality					
	The facility has an existing stack for the release of emissions. It will be able to handle the capacity increase without any	TN	EMPr to be amended to reflect reference to AEL and to remove reference to Air permit.	C	The existing stack is monitored annually in accordance with the AEL every August. The 2023 annual report confirms that Sasolburg

Ref	Commitment	2019 Status	2019 Finding	2024 Status	2022 Finding
	modification required. An increase of approximately 15-20 % in emissions is expected. This includes formic acid, alcohols, paraffins, acetic acid and traces of hydrocarbons. The level will however still be within the limits of the current air permit. There will therefore be no significant effect on the air quality as result of this project.				Operations complied fully with its emission limits contained within its AEL.
7.2.4 Effluent					
	No solid waste is produced from the manufacturing process. All packaging material, domestic and other non-hazardous waste will be disposed of at a licenced landfill.	TN	Waste is however contracted out. Consider changing the EMP condition to remove Metsimaholo condition.	C	<p>The Auditor was informed that no solid waste is produced from the OCE manufacturing process. Off-spec product is sold to third parties as 'sweepings and scrap materials is auctioned by Redundant Material Management (RMM).</p> <p>Domestic waste on site is routed by the Hub to either EnviroServ, Interwaste or Averda for disposal at a licenced landfill (Holfontein or Vlakfontein landfill).</p>
7.2.9 Health, Safety and Risk Assessment					
	An internal SASOL's risk study, namely FMEA (Failure Mode Effect Analysis) will be conducted on the proposed project. This is a study where the whole project and all the equipment involved is reviewed in detail by the	TN	No objective evidence to prove that the FMEA was completed. However, evidence observed to prove that a HAZOP dated January 2003 was conducted.	C	<p>Sasol did not provide proof of the FMEA report or records for the OCE facility.</p> <p>However, the HAZOP was developed prior to the construction and operation of any unit at Sasol. The plant manager and SSO SHE representative advised</p>

Ref	Commitment	2019 Status	2019 Finding	2024 Status	2022 Finding
	engineering design and operation team, and potential failures or departures in the normal mode of operation are assessed.				that the required safety procedures that were developed to cancel or ameliorate the effects of any failures or onsite malfunctions identified in the study HAZOP were in place and that no failures or malfunctions had occurred at this unit since operation. A safety and maintenance management plan were in place for the OCE.

6 SUMMARY OF THE AUDIT FINDINGS

6.1 SASOL SASOLBURG OCE PROJECT 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
Brief Description of the Activity	1	1	0	0
Location	1	1	0	0
Applicant	1	1	0	0
Site Visit	1	0	0	1
Decision	1	0	0	1
Specific Conditions	5	2	0	3
General Conditions	12	4	0	8
Key Factors in Decision	2	1	0	1
Duration and Date of Expiry	1	0	0	1
Appeal	1	0	0	1
Total	26	10	0	16
Total Percentage		38%	0%	62%
Percentage Compliance with Applicable Conditions	100%			

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

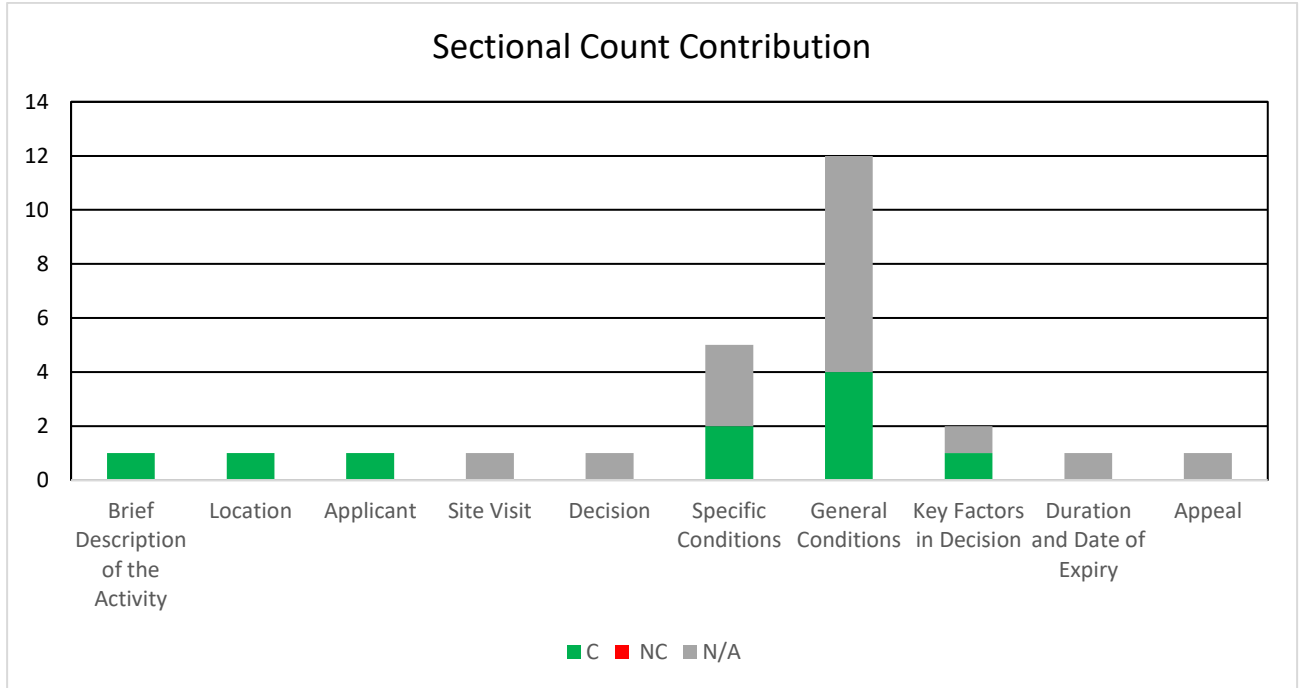


Figure 6-1 - Number/Count contribution of findings made to the EA conditions per section

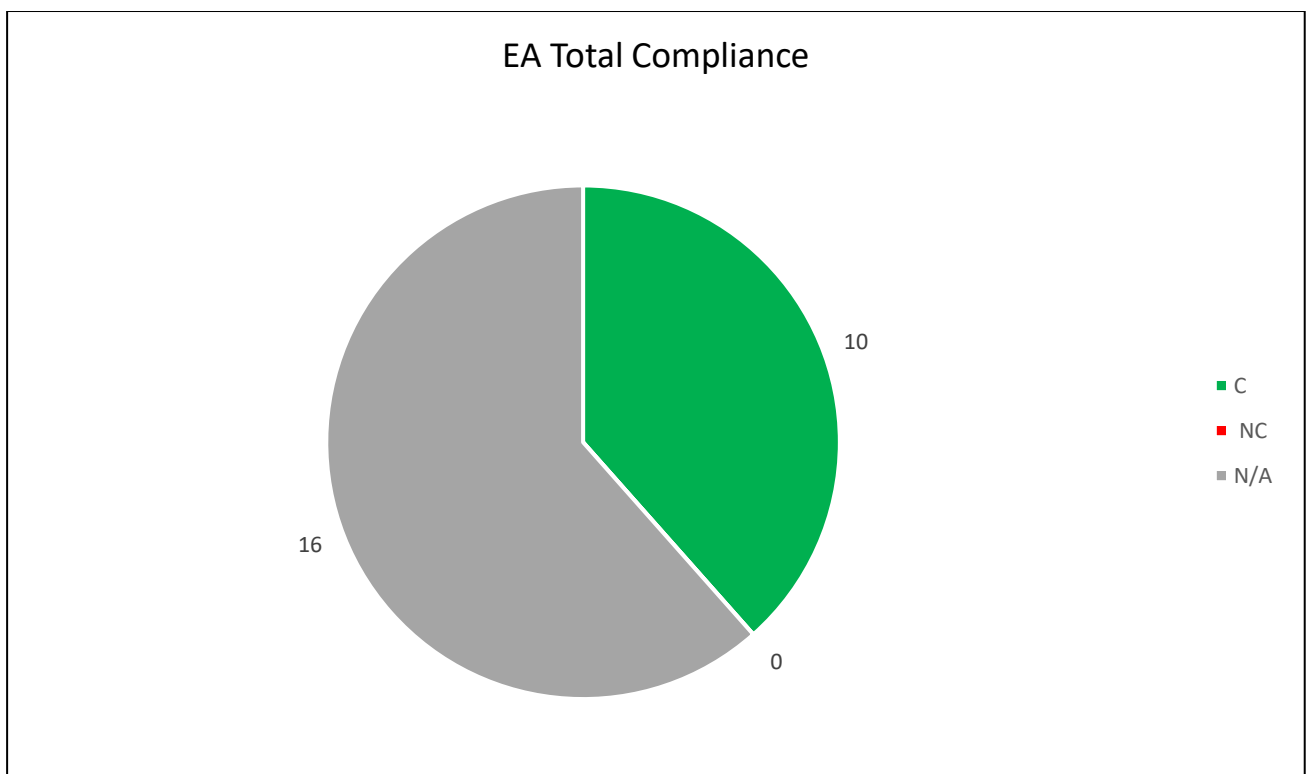


Figure 6-2 - Overall count findings on compliance to the EA commitments

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

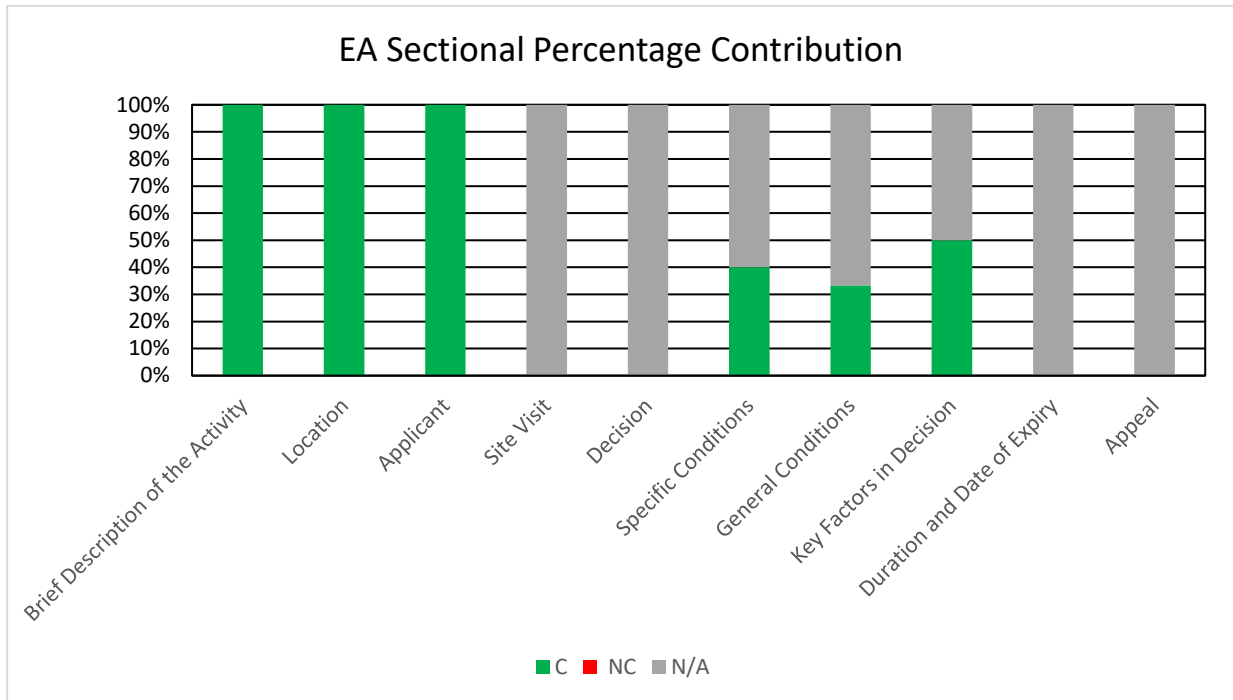


Figure 6-3 - Percentage contribution of findings made to the EA Commitments per Section

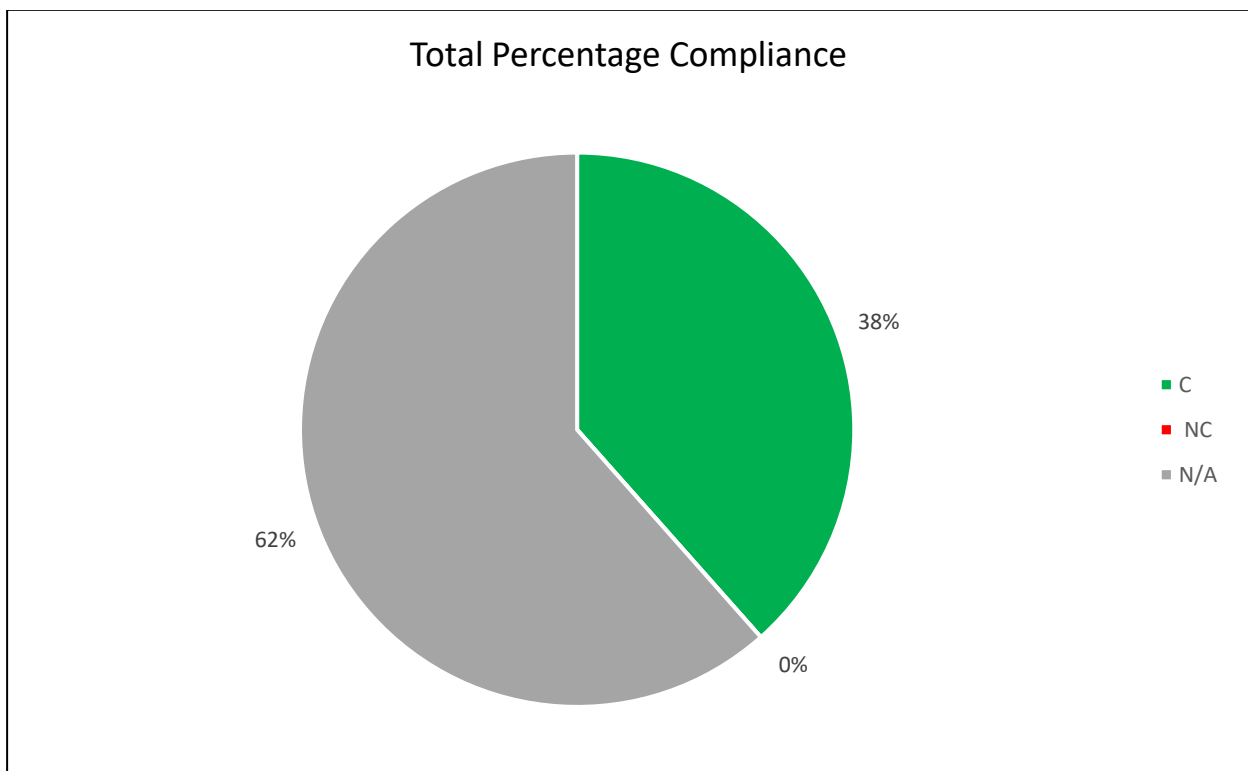


Figure 6-3 - Overall percentage findings on compliance to the EA Commitments

6.2 SASOL SASOLBURG OCE PROJECT EMPR COMPLIANCE

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

Table 6-2 - Summary of EMPr Compliance Audit Findings

Section of the EMPr	No. Commitments	C	NC	N/A
Land and Soil	2	0	0	2
Surface Water and Ground Water	2	1	0	1
Air Quality	1	1	0	0
Effluents	5	4	0	1
Fauna and Flora	1	1	0	0
Visual	1	1	0	0
Noise	1	0	0	1
Socio-economy	1	0	0	1
Health, Safety and Risk Assessment	7	2	0	5
Total	21	10	0	11
Total Percentage		48%	0%	52%
Percentage Compliance with Applicable Conditions	100%			

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

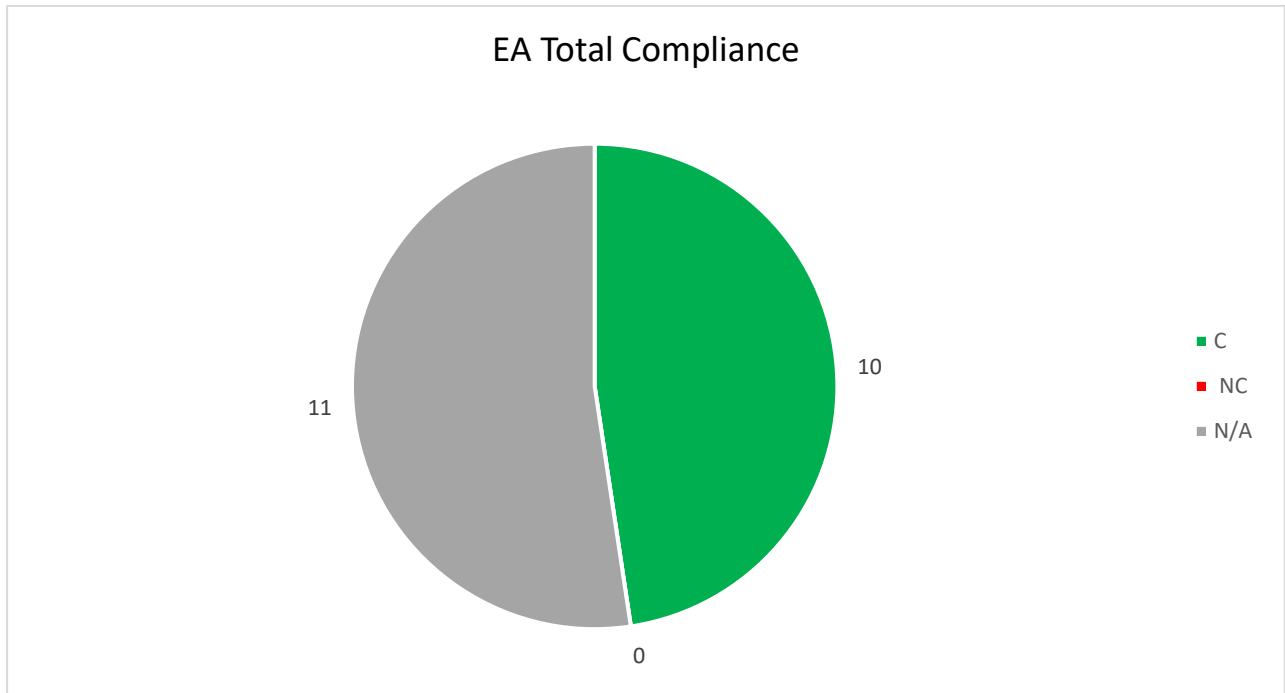


Figure 6-4 - Overall count findings on compliance to the EMPr Commitments

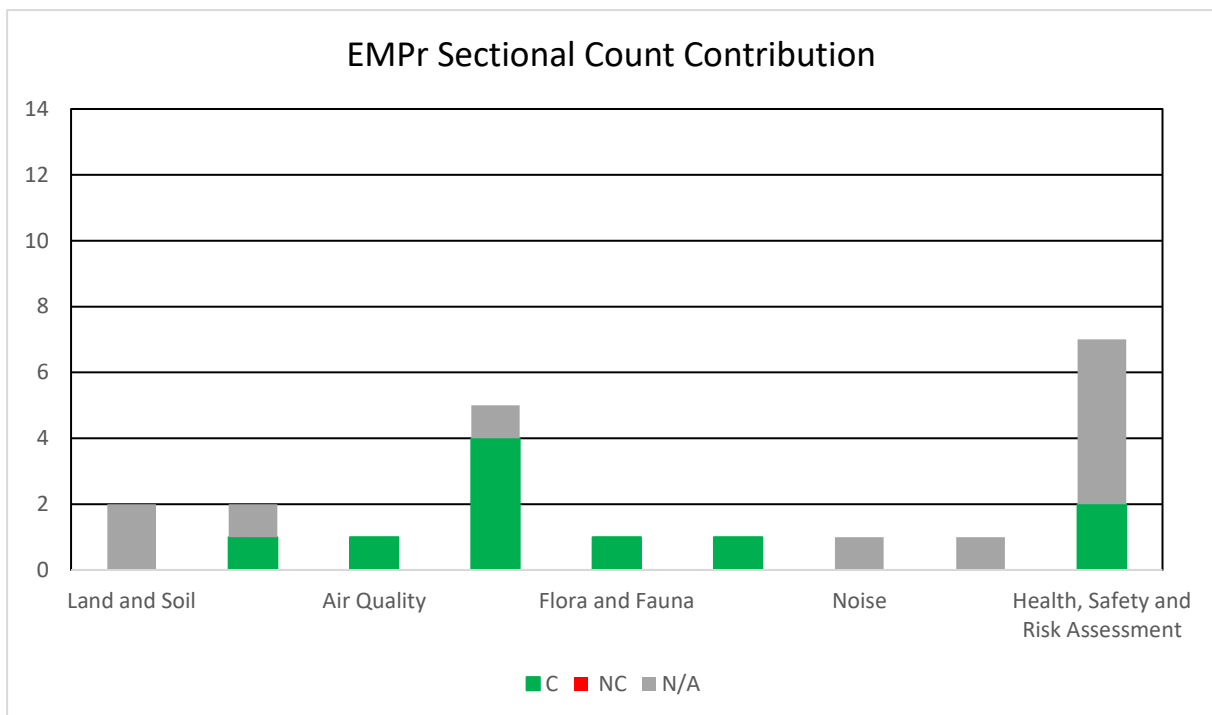


Figure 6-5 - Number/Count contribution of findings made to the EMPr Commitments per Section

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

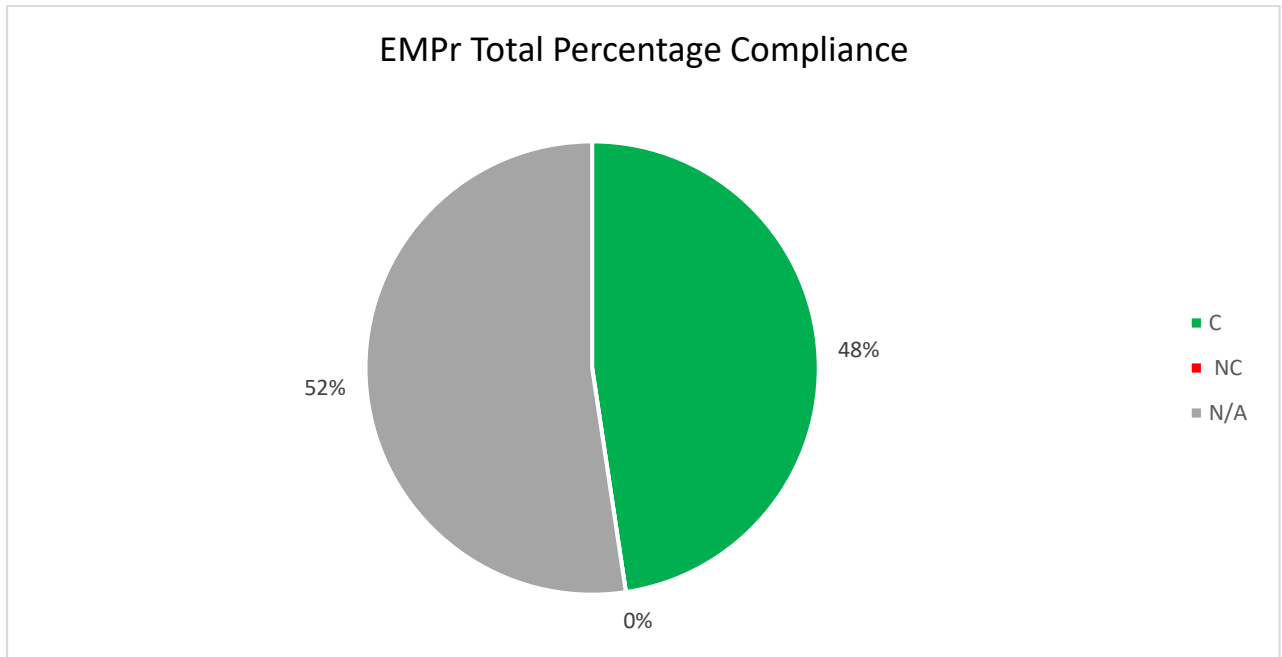


Figure 6-6 - Overall percentage findings on compliance to the EMPr Commitments

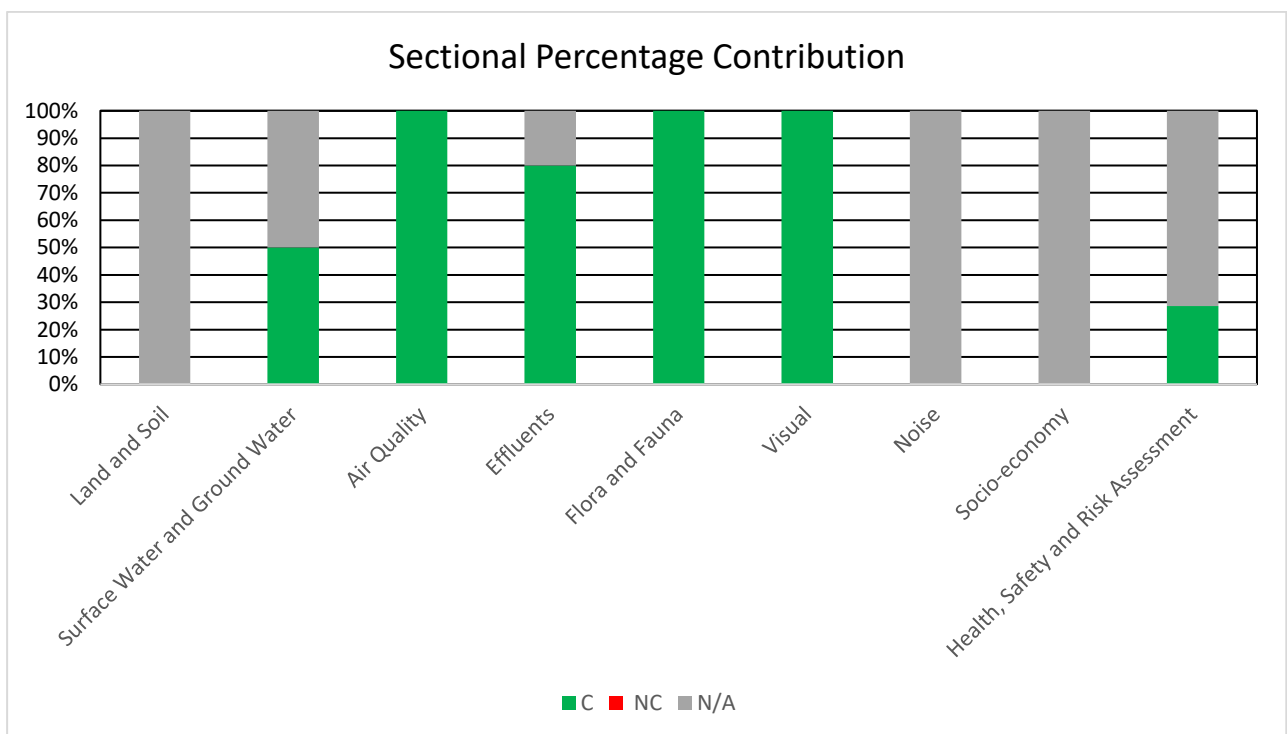


Figure 6-7 - Percentage contribution of findings made to the EMPr Commitments per Section

7 RECOMMENDATIONS

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

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

8 EFFECTIVENESS OF THE EMPR

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

- Assess the extent to which the avoidance, management and mitigation measures provided for in the EMPr, achieve the objectives and outcomes laid out in these documents;
- Identify and assess any new impacts and risks that result from undertaking the activity;
- Critically evaluate the effectiveness of the EMPr;
- Identify shortcomings in the EMPr; and
- Identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr.

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

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

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

9 DECLARATIONS

INDEPENDENT AUDITOR DECLARATION

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

NAME OF INDEPENDENT AUDITOR: _____Matilda Mbazo_____

UNDERTAKING

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

Signed at _____Midrand_____ on this the _____07 November_____2024

SIGNATURE OF INDEPENDENT AUDITOR

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

Appendix A

AUDITOR CVS



Matilda Mbazo

Earth and Environment, Environmental Planning & Advisory, Graduate Consultant

CAREER SUMMARY

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



2 > years with WSP

Language

Afrikaans, English, Tswana, Ndebele, and Zulu

EDUCATION

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

PROFESSIONAL MEMBERSHIPS

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

PROFESSIONAL HISTORY

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

PROFESSIONAL EXPERIENCE

Environmental Authorisation Audits

FFS Chloorkop Fired Heater



July 2022 to June 2023

ECO: EA and EMPR Compliance Audit

Environmental Auditor : EA and EMPr Annual Compliance Audit

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

October 2022

October 2023

July 2024

Environmental Auditor

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

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

November 2023

Environmental Auditor : EA and EMPr Compliance Audit

Impala Platinum Holdings Limited

June 2024

Environmental Auditor : Norms and Standards Audit

Sasol South Africa Limited and Wood

July 2024 – July 2025

ECO: EA and EMPR Compliance Audit

Sasol Ekandustria Operations

September 2024 – September 2025

ECO: EA, EMPR and WUL Compliance Audit

Investchem (Pty) Ltd

September 2024

Environmental Auditor : EA and EMPr Compliance Audit

Environmental Management Plans

ArcelorMittal South Africa, South Africa

April 2024

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

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

June 2024



Environmental Management Plan for the proposed Hybrid Project.

ENERTRAG, South Africa

2024

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

Legal Audits

Sasol South Africa Limited

March 2024

Undertaken the Regulation 34 Compliance Audits for various Third Parties

Barloworld Ingrain

April 2024

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

Renewables

ENERTRAG, South Africa

2024

Scoping and Environmental Impact Assessment for Impumelelo Wind Facility

Eskom Holdings SOC Ltd

September 2024

Part 2 amendment of an EA for a solar facility

Dissertations and Research Projects

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

2023-2024

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

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

2022

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



Yvette Mmanasoe

Senior Consultant

CAREER SUMMARY

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



1 years with WSP

8 years of experience

Area of expertise

Public Participation Process
Social Impact Assessment
IFC Principles

Language

English, Sepedi, Afrikaans, Sesotho, Setswana, Zulu

EDUCATION

BSc Environmental Geography	2015
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ADDITIONAL TRAINING

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

PROFESSIONAL MEMBERSHIPS

IAIASA
2023



Yvette Mmanasoe

Senior Consultant

PROFESSIONAL HISTORY

WSP Group Africa (Pty) Ltd

August 2023 – present

Agron Moosrivier (Pty) Ltd

July 2015 – April 2023

PROFESSIONAL EXPERIENCE

Area of expertise

Sub-area (if required)

Thungela Resources, Zibulo Underground Extension Mine, RSA

Year 2021/2022

Role

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

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

Year 2019/2020

Role

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

Kriel Housing Development, Kriel Housing Development, RSA

Year 2019/2022

Role

Conduct SIA for the BAR Process



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

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Annexure B – Oxidation capacity expansion

Environmental Management Programme Operational Phase

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

Impact Management Outcome		Impact Management Action
1.Surface and groundwater.	The whole existing area is paved and fitted with existing sewers to capture any effluent. The project will therefore have no negative effect on the surface and groundwater quality.	1.1 The whole existing area is paved and fitted with existing sewers to capture any effluent.
2. Air Quality management	The facility has an existing stack for the release of emissions. It will be able to handle the capacity increase without any modification required. This includes formic acid, alcohols, paraffins, acetic acid and traces of hydrocarbons. The level will however still be within the limits of the current AEL. There will therefore be no significant effect on the air quality as result of this project	2.1 The existing stack is operated and managed within the limits contained in the existing AEL
3. Liquid effluent management	<p>Water may be used to wash, and pressure test the pipelines during the PRE-COMMISSIONING phase of the project. This water will be handled by the existing storm water system, as the equipment will be new, and no contamination is expected. The rest of the operation will continue using the existing cleaning procedures.</p> <p>The manufacturing process itself does not create any by-product effluents that requires disposal</p>	3.1 Effluent generated during cleaning will be routed to the existing effluent system on site and utilise existing cleaning procedures

4. Solid effluent management	Solid waste produced within the manufacturing process is disposed of via the standard waste disposal procedures at licenced landfills. All packaging material, domestic and other non-hazardous waste will be disposed of at a licenced landfill.	4.1 No solid waste is produced from the manufacturing process. All packaging material, domestic and other non-hazardous waste will be disposed of at the Metsimaholo municipal landfill 4.2 In the event of off-spec product it will either be sold as sub-spec product or routed to Natref to be used as fuel: As a last resort it will be disposed of through a licenced third-party waste management company.
5. Emergency preparedness	Emergency preparedness	5.1 All employees must be made aware of the existing emergency procedures and responsibilities where applicable.