



Our reference: SO-ENV-1350

29 November 2024

Your Ref: EA nr EM1/1(c)/02/148

Department of Economic, Small Business Development, Tourism and Environmental Affairs  
113 Saint Andrews Street,  
St Andrews Building  
3<sup>rd</sup> Floor , Room 8  
Bloemfontein  
9301  
Free State

Delivered via e-mail: [mkhosana@destea.gov.za](mailto:mkhosana@destea.gov.za)  
[mathibea@destea.gov.za](mailto:mathibea@destea.gov.za)  
[seekoeis@destea.gov.za](mailto:seekoeis@destea.gov.za)

Attention: Deputy Director: Environmental Impact Assessment

## **ENVIRONMENTAL AUTHORISATION EXTERNAL REPORT SUBMISSION**

Environmental Authorisations of Sasol South Africa Limited, Sasolburg Operations was externally audited during 2023 and 2024. The external audits were conducted to comply to the requirement contained in Chapter 5 part 3 of the Environmental Impact Assessment Regulations.

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

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

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

Attached, please find compliance audit report for the establishment of the Polythene Plant 1&3, dated October 2024 Environmental Authorisation with reference EM1/1(c)/02/148.

### **Sasolburg and Ekandustria Operations**

1 Klasie Havenga Street Sasolburg 1947  
Telephone +27 (0)16 960 9111 [www.sasol.com](http://www.sasol.com)

### **Sasol South Africa Limited** 1968/013914/06

Sasol Place 50 Katherine Street Sandton 2146 South Africa Private Bag X10014 Sandton 2146 South Africa  
Telephone +27 (0)10 344 5000 Facsimile +27 (0)11 788 5092 [www.sasol.com](http://www.sasol.com)

Directors: VD Kahla (Chairman) BSM Backman B Baijnath T Booley GN Ndwammbi RM Laxa NP Magaqa Z Monnagotla CK Mokoena  
MS Solomon PM Vilakazi LB Zondo

Company Secretary: M du Toit

The complete report, dated October 2024, is attached hereto as Annexure A. 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 effected 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 Polythene Plant 1&3.

Yours faithfully,

Signed by: Johann Van Wyk  
Signed at: 2024-12-02 08:08:11 +02:00  
Reason: I approve

*Johann Van Wyk*

**Johann van Wyk**  
**Senior Manager Environment and Product Stewardship (acting)**

Tel: +27 16 960 2398  
Email: johann.vanwyk1@sasol.com

**Annexure A****Audit report.**

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



Sasol South Africa Ltd

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**POLYTHENE PLANT 1 & 3  
ENVIRONMENTAL AUTHORISATION (REF.  
NO: E/04/02) AND ENVIRONMENTAL  
MANAGEMENT PROGRAMME AUDIT**

Compliance Audit Report: November 2019 - July  
2024





Sasol South Africa Ltd

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# **POLYTHENE PLANT 1 & 3 ENVIRONMENTAL AUTHORISATION (REF. NO: E/04/02) AND ENVIRONMENTAL MANAGEMENT PROGRAMME AUDIT**

Compliance Audit Report: November 2019 - July 2024

**TYPE OF DOCUMENT (VERSION) CONFIDENTIAL**

**PROJECT NO. 41106913**

**DATE: OCTOBER 2024**



Sasol South Africa Ltd

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# **POLYTHENE PLANT 1 & 3 ENVIRONMENTAL AUTHORISATION (REF. NO: E/04/02) AND ENVIRONMENTAL MANAGEMENT PROGRAMME AUDIT**

Compliance Audit Report: November 2019 - July 2024

WSP

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

Phone: +27 11 254 4800

[WSP.com](http://WSP.com)



# QUALITY CONTROL

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# 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 Amended Environmental Authorisation (EA) (reference number EM/1/1C/02/148) for the Polythene 1 & 3 (Poly 1 & 3) plants and the Environmental Management Programme (EMPr), and to compile an audit report according to the requirements of the National Environmental Management Act (No. 107 of 1998), as amended (NEMA).

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

- RoD for the Poly 1&3 plants in Sasolburg (reference number: EM/1/1C/02/148), dated 25 August 2003 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 for the Poly 1 & 3 plants at the Sasol One site in Sasolburg (reference number: EM/1/1C/02/148), dated 28 November 2017 by the DESTEA. The amendment includes:
  - Applicant details:
    - Contact person
    - Contact numbers
    - Address
- The amendment of the EA for the Poly 1 & 3 plants at the Sasol One site in Sasolburg (reference number: EM/1/1C/02/148), dated 14 August 2020 by the DESTEA. The amendment includes:
  - Applicant details:
    - Contact person
    - Contact numbers.
    - Address
  - Specific conditions 6,10 and 11 was removed from the EA.
- The amendment of the EA for the Poly 1 & 3 plants at the Sasol One site in Sasolburg (reference number: EM/1/1C/02/148), dated 07 July 2023 by the DESTEA. The amendment include:
  - Specific conditions 4, 5 and 7 was removed from the EA.
  - Specific condition 3 and 9 was amended.
- Proposed Polythene 1 & 3 EMPr, dated March 2019.

## 1.2 PROJECT DESCRIPTION

Sasol Polymers is a subsidiary company owned by Sasol. Sasol Polymers is located at Sasol Midland site in Sasolburg.

Sasol Polymers has two plants that produce different types of polyethylene. The Poly 3 plant was commissioned in December 2005 and the plant produces Low Density Polyethylene with ten different grades. These polyethylene products are produced as pellets, which are put into bags and sold to customers in the plastics industry. Low density polyethylene and linear low-density polyethylene are used for different purposes in the plastics industry.

Polyethylene, which is also called polythene, is one of the main polymers used to manufacture plastic products, including:

- clear and printed packaging
- laminations
- pet food bags
- milk cartons
- industrial and household insulation
- plastic bags
- plastic containers
- moulded products such as plastic cups

The Poly 3 plant is world scale size and the technology that is utilised is much more efficient than the old Poly 1 plant, particularly in terms of reduced ethylene emissions and oil and peroxide usage per ton. It is however operated at a higher pressure (over 3000bar) and as such will use more electricity per ton.

Instead of an autoclave reactor, the technology uses long tubes, over 2.2 km long, through which the ethylene will be converted to polyethylene. Instead of a stirrer, it uses the mixing of the gas in the tubes to keep the reacting mixture well mixed. To control the temperature in the tubes, there is a system of cooling jackets around the tubes. Peroxide catalysts and other additives enter the tubes at different points and these streams will also be used to control the temperature profile in the tubes since they will be cooler.

### 1.3 PROJECT TEAM

WSP auditors, Matilda Mbazo and Yvette Mmanasoe, completed a site inspection of the Poly 3 plants against the EA conditions (reference: EM/1/1C/02/148) at the Sasol One facility on **19 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

Audit Team	Role	Experience
		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 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 Poly 1 & 3 plants 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 amendment and EMPr, as indicated in **Section 1.1**.

The objective of the audit was to:

- Assess the level of compliance with the commitments of the EA and changes in the EA amendment for the Poly 1 & 3 plants.
- Assess the level of compliance with the commitments of the EMPr that was submitted as part of the Scoping Report for the application for environmental authorisation, as agreed and approved by DESTEA;
- Assess the extent to which the avoidance, management and mitigation measures provided for in the EMPr for the operation of the Poly 1 & 3 plants 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 Poly 1 & 3 plant 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 (**19 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 **19 July 2024** where findings and observations were recorded and are summarised in **Section 4**. Key personnel interviewed during the audit included:

- Suyen Van Zyl – SHE Environmental Specialist;
- Chantelle Malele – Technician; and
- Risinga Mthombeni – Area Manager.

### 3.3 INFORMATION CONSIDERED

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

- EA (EM/1/1c/02/148) dated 25 August 2003;
- Notification of Change of Contact Details of the Business Representative (Ref: SO-env-1285) dated 08 July 2024;
- Procedure for the removal of waste from the SEO Sasolburg Sites (SSP-S-014, Revision 7) dated 01 August 2022;
- Proposed Polythene 1 & 3 EMPr dated March 2019;
- Sasol South Africa Ltd in Sasolburg, External Audits of EAs/RODs/EMPrs: W&S, Poly 3 Project at Sasol One Site dated 11 November 2019 by Centre of Environmental Management;
- Improve smokelessness at Poly flare;
- Position of Gas detectors (Poly 3) drawing;
- Enserve Emission Rate Survey dated January 2024;
- Enserve Leakers List Survey for Poly 3 dated January 2024;
- Enserve Client report dated January 2024;
- LDAR Repair Order (211, 257, 36 and 50) dated 15 January 2024;
- Mechanical flow diagram waste water system DWG nr: U-ND-1-0209-001;
- Spillage Handling Procedure (PE3-GEN-OTM -002);
- Handbook: Polythene emergency preparedness and response (EOSEO-HB-0779) dated 17 October 2023;
- Storage of flammable and consumable fluids (SSP-S-059);
- Noise exposure verification and assessment for hearing conservation purposes (SEO-217-2022-EN-N) dated 08 March 2023;
- Integrated Water and Waste Management Plan (IWWMP) Rev 1 – report number: SO-env-1192 (Sasolburg Operations, December 2023) that includes the:
  - Stormwater Management Plan (SWMP, 2023);
  - Rehabilitation Strategy and Implementation Plan (RSIP);
  - Water Conservation and Demand Management (WC/DM);
  - Malfunctions register;
  - Water management;

- Groundwater management;
  - Waste management;
  - Contaminated Water and Wastewater Management;
  - Effluent Management; and
  - Land management.
- Waste Management and Disposal Registers;
  - Environmental Standards;
  - Health and Safety Standards and Audits; and
  - Other related approvals documents.

### 3.4 ASSESSMENT EVALUATION METHODOLOGY

The consolidated report contains all commitments, which were formulated as part of the original and amended EA and EMP. Each commitment contained in the audit checklist was assessed by reviewing site documentation, interviewing employees, and undertaking a site inspection. The application of the EMP was assessed and the level of compliance rated (compliance categories contained in **Table 3-1**). The compliance of the operations listed in **Section** Error! Reference source not found. was assessed.

**Table 3-1 Levels of Compliance**

Compliance Level	Definition
<b>Compliant (C)</b>	<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>
<b>Non-compliant (NC)</b>	<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"> <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>	<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: EM1/1(c)/02/148 dated 25 August 2003) and associated amendment (reference: EM1/1(c)/02/148 dated 28 November 2017, 14 August 2020 and 07 July 2023) Audit Findings**

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
<b>A. Brief Description of the Activity</b>				
	<p>Poly 3 plant, the proposed construction of a new plant will produce Linear Low Density Polyethylene pallets. The new Poly 3 plant will be an ExxonMobil (cannot produce special blend low density polyethylene) plant, producing 220 000 tons of LDPE per year.</p> <p>The raw materials used in these two plants are ethylene, peroxide catalyst and additives. The utilities used are raw water, steam, electricity, nitrogen air and firewater. Gas emissions will be restricted to only some un-reacted ethylene gas. This gas is lost to the atmosphere through vents. Waste streams will include dirty water from the plants and will be sent to the effluent treatment works via the Midlands site sewer system.</p>	<b>C</b>	<p>The auditor was informed that the description of the Poly 3 plant remains unchanged from the activity outlined in the EA. During the site audit, the activities were observed, and the auditor confirmed that the Poly 3 plant is located at the Midlands site, near other polythene plants.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> <li>Visual Site Observation</li> <li>EA (EM/1/1c/02/148) dated 25 August 2003</li> </ul>	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	The site location for the new Polythene Plant 3 is proposed to be in Sasolburg in proximity to the current Polythene plants so as to use existing resources and infrastructure.			
<b>B. Location</b>				
	The Sasol Polymers site is situated within the Sasol Midlands site in Sasolburg. Situated on subdivision of the farms Driefontein No. 2 and Zandfontein No. 259 in the administrative District of Sasolburg.	<b>C</b>	<p>The auditor confirmed that Sasol Polymers is situated within the Sasol Midlands site on the authorised farms.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> <li>Google Earth</li> <li>EA (EM/1/1c/02/148) dated 25 August 2003</li> </ul>	None.
<b>C. Applicant</b>				
	<p>Mr. Righwell Laxa</p> <p>SVP Sasolburg Operations</p> <p>Sasol South Africa Ltd acting through its Sasolburg Operations</p> <p>P.O. Box 1, SASOLBURG, 1947</p> <p>Tel: +27 16 960 8001</p>	<b>C</b>	<p>The auditor noted, based on the site-wide notification to the Department dated 08 July 2024, that the responsible person and the contact details was changed from Mr. Rightwell Laxa, to the following:</p> <p>Ntokozo Gcabashe</p> <p>ntokozo.gcabashe@sasol.com</p> <p>016 960 2007</p> <p><i>Evidence:</i></p>	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>	
<b>Specific Condition</b>				
1.	This authorisation has been granted solely for the purpose of undertaking the specified activity referred to above	C	<p>The EA was granted by DESTEA for the Poly 1 &amp; 3 plant on the 25 August 2003.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>EA (EM/1/1c/02/148) dated 25 August 2003</li> </ul>	None.
2.	An integrated waste management approach must be used that is based on best practices and should incorporate reduction, recycling, re-use and disposal where appropriate.	C	<p>The integrated waste management approach is stipulated in the 'Procedure for the removal of waste from the SEO Sasolburg Sites' (SSP-S-014) that incorporates the principles of waste management including recycling, re-use and disposal where required. Moreover, the IWWMP outlines the mandatory approach for best practices in waste management for all sites at Sasol. These practises were observed to be in place during the site visit to the plant at general waste storage facilities and hazardous waste storage facilities.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Procedure for the removal of waste from the SEO Sasolburg Sites (SSP-S-014, Revision 7) dated 01 August 2022</li> <li>IWWMP (SO-env-1192) dated December 2023</li> </ul>	None.
3.	The impact and mitigations in the current valid environmental Management plan must be adhered to.	C	The auditor reviewed the EMP which incorporates the impacts, mitigation measures and recommendations. All	None.

POLYTHENE PLANT 1 & 3 ENVIRONMENTAL AUTHORISATION (REF. NO: E/04/02) AND ENVIRONMENTAL MANAGEMENT PROGRAMME AUDIT

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			relevant conditions stipulated were complied to in <b>Table 4-2</b> . <i>Evidence:</i> <ul style="list-style-type: none"> <li>Proposed Polythene 1 &amp; 3 EMPr dated March 2019</li> </ul>	
8.	During the construction phase contracting companies must have a safety representative on site to ensure compliance with all relevant safety rules and emergency procedures.	N/A	The Poly 3 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None.
9.	Should the activity ever cease or become redundant the applicant shall undertake the required actions as prescribed by legislation at the time, in line with the identified future land use, and comply with all relevant legal requirements administered by any relevant and competent authority at that time.	N/A	The Poly 3 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None.
12.	A detailed incidence (spills, fire etc.) register must be kept and be available to authorities.	C	The auditor observed that a detailed incident register is kept on the Isometrix system that includes the responsible person to handle the incident, the detail of the incident and the close out of the incident which is readily available upon request. <i>Evidence:</i> <ul style="list-style-type: none"> <li>Isometrix system -Incident register 2022-2024</li> </ul>	None.
13.	All operations must cease if it becomes apparent that any assumption on which the application was based is incorrect.	N/A	No incorrect assumptions were identified during the current audit period.	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
14.	It is the responsibility of the applicant and the contractor on site to prevent any surface (stormwater) pollution.	N/A	This condition is noted by the holder of this authorisation.	None.
15.	In case of non-compliance with regulations the burden of proof rests with the applicant and/or the relevant contractor	N/A	This condition is noted by the holder of this authorisation.	None.
<b>General Conditions</b>				
16.	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 Poly 1 & 3 plant and SSO with all statutory requirements and whether they were in possession and compliance of all the necessary permits, authorisations or any other official documents.	None.
17.	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	The Poly 3 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None.
18.	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 Poly 3 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None.
19.	This authorisation refers only to the project specified and described in this Record of Decision:			
a.	Changes in the proposal resulting in significant environmental impacts are only permissible if approved in writing by the Department.	N/A	Noted. The advertisement of the RoD was considered for the pre-construction and construction phase; therefore, this condition is outside the audit period and was not audited.	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
b.	The Department reserves the right to amend and review the conditions of authorisation every 5 years.	N/A	This condition is noted by the holder of the authorisation.	None.
20.	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. The auditor was informed that there was not any change of ownership and/or project developer.	None.
21.	The Department must be notified of any change of address of the owner and/or developer.	N/A	Noted. The auditor was informed that the there is no change in the address of the owner and/or developer.	None.
22.	The conditions of the authorisation should be brought to the attention of all persons (employees, sub-consultants etc) associated with the undertaking of this activity to bind such persons to these conditions.	C	<p>Sasol, as the holder of the authorisation, acknowledges responsibility for ensuring compliance with the EA and provides environmental management awareness training to staff, service providers, contractors and visitors to ensure that everyone employed or acting on their behalf is aware that they need to comply with the EA and the EMPr conditions. Induction training is provided to all staff, service provides, contractors and visitors.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> <li>Induction Materials</li> <li>Online Training Matrix</li> </ul>	None.
23.	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.	C	Sasol conducts internal and external performance audits according to Regulation 34 of the EIA Regulations, 2014 (as amended) for the operational phase of the Poly 3	None.



Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<p>plant. The last audit report was submitted to the Department on 29 November 2019.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> <li>Sasol South Africa Ltd in Sasolburg, External Audits of EAs/RODs/EMPrs: W&amp;S, Poly 3 Project at Sasol One Site dated 11 November 2019 by Centre of Environmental Management</li> </ul>	
24.	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 of operations of the development (as appropriate)	N/A	The Poly 3 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None.
25.	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 the Department.	C	<p>Records of compliance/non-compliance with conditions of this authorisation are kept in good condition and were readily available and therefore should be readily available should the Department require such. No request was made by the Department during the current audit period for records or documents.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> <li>Verbal Confirmation</li> <li>Sasol South Africa Ltd in Sasolburg, External Audits of EAs/RODs/EMPrs: W&amp;S, Poly 1&amp;3 Project at Sasol One Site dated 11 November 2019 by Centre of Environmental Management</li> </ul>	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
26.	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. No deviations from the stated conditions within the EA were noted during the current audit.	None.
27.	The applicant shall be responsible for all costs necessary to comply with the above conditions unless otherwise specified.	N/A	This condition is noted by the holder of this authorisation.	None.
	Provincial Government, Local Authority, or committees appointed in terms of the conditions of the application or any other public authority or organization shall not be held responsible for any damages or losses suffered by the developer or his successor in title in any instance where construction or operation subsequent to construction be temporarily or permanently stopped for reasons of non-compliance by the developer with the conditions of approval as set out in this document or any other subsequent doc	N/A	This condition is noted by the holder of this authorisation.	None.
<b>Key Factors for the Decision</b>				
1.	Public participation was completed to the satisfaction of the Department of Tourism, Environmental, and Economic Affairs.	N/A	Noted. The advertisement of the RoD was considered for the pre-construction and construction phase; therefore, this condition is outside the audit period and was not audited.	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
2.	The proposed facility is within the existing industrial area of Sasolburg.	N/A	Noted. The Poly 1& 3 plants are located at the Sasol Midlands site which is an existing industrial zoned area at Sasolburg.	None.
3.	DEAT (Department of Environmental Affairs and Tourism) guidelines for carbon monoxide and oxides of nitrogen are not expected to be exceeded.	N/A	This condition is noted by the holder of this authorisation.	None.
4.	Odours from ethylene emissions will be well below the 25% threshold value.	N/A	This condition is noted by the holder of this authorisation.	None.
<b>1. Duration and date of expiry</b>				
	This authorisation shall lapse if the activity does not commence within five years of the date of issue of this authorisation.	N/A	The Poly 3 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None.
<b>2. Appeal</b>				
	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	The Poly 3 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None.



## 4.2 ENVIRONMENTAL MANAGEMENT PROGRAMME

**Table 4-2** below provides the compliance of Sasol with the conditions within the EMPr that were included in the Proposed Polythene 1 & 3 EMPr dated March 2019.

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

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPr Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
5.1 Air Quality								
	The possibility of reducing air pollution (smoke) originating from flare burning will be investigated	C	<p>During the audit, it was confirmed that Sasol Midlands conducted a Management of Change assessment to explore ways to reduce air pollution resulting from the flare burning off ethylene from the reactor.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"><li>Management of change, Improve smokelessness on Poly 2 flare, MOC No. PE2-2007-05, September 2007</li></ul>	None	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)
	Gas leak detection instruments will be installed to detect any gas leaks at an early stage	C	<p>The auditor observed various yellow <i>Honeywell</i> gas detectors around the Poly 1 &amp; 3 facility.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> <li>Position of Gas detectors (Poly 3) drawing</li> </ul>	None	None.	N/A	N/A	N/A
	Efficient operation of the plant will be managed within current operating procedures in order to minimize upset conditions which may lead to unscheduled flaring.	C	<p>Poly 3 plant is operated in line with the current operating procedures, including LDAR surveys, scheduled maintenance etc. Flaring only occurs during abnormal/emergency situations.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Enserve Emission Rate Survey dated January 2024</li> <li>Enserve Leakers List Survey for Poly 3 dated January 2024</li> <li>Enserve Client report dated January 2024</li> </ul>	None	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>LDAR Repair Order (211, 257, 36 and 50) dated 15 January 2024</li> </ul>					
<b>5.2 Consultation with Interested and Affected parties</b>								
	Open liaison channels should be established between the Sasol (developer), Polythene (operator), the contractors and Interested and Affected Parties (I&AP's) such that any queries, complaints or suggestions can be dealt with quickly and by the appropriate person(s).	<b>C</b>	<p>The auditor was informed that Sasol provides a toll-free number and holds regular community forums to address any complaints or suggestions. These inquiries are managed by the SHE representative.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> </ul>	None	None.	N/A	N/A	N/A
<b>5.3 Effluent Handling</b>								
	The clean and dirty water systems will be separated to prevent contaminated run-off from entering the surface and groundwater and soil.	<b>C</b>	<p>All stormwater and water separated from the oil is directed to the Sasol effluent control dam that is managed by the Utilities Department. The auditor observed this practice during the site audit.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	None	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>IWWMP (SO-env-1192) dated December 2023</li> <li>Mechanical flow diagram waste water system DWG nr: U-ND-1-0209-001</li> </ul>					
	All water effluent will be routed to the existing Midland effluent system	C	<p>As per Sasol's IWWMP, all effluent is routed to the existing Midland effluent dam.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>IWWMP (SO-env-1192) dated December 2023</li> </ul>	None	None.	N/A	N/A	N/A
	Should an accidental spill event occur, then the effluent will be contained and managed by means of the effluent collection pit.	C	<p>The effluent collection pit has water continuously running to ensure circulation and surfing of polythene plastic/beads so they're cleaned. The dirty water from the plant is sent to the effluent treatment works via the Midlands site sewer system to the effluent control dam.</p> <p>The oil containers are stored on an impermeable surface in case of a spill event. Various spill kits were observed around the Poly 3 facility.</p>	None	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>Spillage Handling Procedure (PE3-GEN-OTM -002)</li> </ul>					
	Contamination of the surface and ground water and soil will be prevented at the flare knock-out pot	C	<p>The flare knock-out pot's contents are collected in the flare sump, which is designed to hold the flare liquid. The sump is equipped with an auto-controlled pump that is regulated by a level detection system. When the liquid level rises, the pump activates to drain the sump and transfer the contents to the plant's oil sump.</p> <p>Once the level drops to a minimum, the pump automatically stops to prevent cavitation. This automatic level control helps prevent the flare sump from overflowing, thus avoiding potential ground contamination and underground water issues.</p> <i>Evidence:</i> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> </ul>	None	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>					
	Contamination of the surface and ground water and soil as a result of oil spills from the compressors will be minimized within current operational and maintenance procedures.	C	<p>All equipment, including compressors, is located in bunded areas or on concrete/paved surfaces to ensure safe handling of waste materials.</p> <p>Sasol has developed and implemented clean-up procedures in case of a spill event.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> <li>Spillage Handling Procedure ( PE3-GEN-OTM -002)</li> </ul>	None	None.	N/A	N/A	N/A
	Waste slop oil will be sold as burner oil as far as possible.	C	<p>The auditor was informed that all waste slop is sold to FFS Refiners for recycling.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> </ul>	None	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)
	All loading of products will be done in bunded areas to contain any possible spills.	C	<p>The auditor observed that the area where all loading activities take place is bunded and has drainage system to contain any possible spills.</p> <p>The oil containers are stored on an impermeable surface in case of a spill event. Various spill kits were observed around the Poly 3 facility.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Spillage Handling Procedure (PE3-GEN-OTM-002)</li> </ul>	None	None.	N/A	N/A	N/A
<b>5.4 Emergency Plan</b>								
	An emergency plan should be available for major environmental emergencies during operation activities (with consideration of air, groundwater, soil and surface water) and appropriate training must be provided therein.	C	<p>An emergency preparedness and response plan were developed and kept on file in the Polythene offices for each emergency. Staff received training on this.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Handbook: Polythene emergency preparedness and response (EOSEO-</li> </ul>	None	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)
			HB-0779) dated 17 October 2023					
	The Operator must report all major pollution incidents to DWAF within 24 hours of occurrence. Record(s) of environmental related incidents must be maintained.	N/A	<p>Noted. Ethylene gas leak incidents occurred on 31 July 2021, 01 August 2021, 27 December 2021 and 24 December 2022. On 20 August 2021, a puncture incident caused a spillage of iso-dodecane. The auditor was informed that all these incidents were classified as minor incidents in accordance with Sasol's incident management system therefore, they were not reported to the competent authority.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> <li>Isometrix system</li> <li>Incident register for 2021-2022</li> <li>Incident register 2023-2024</li> </ul>	None	None.	N/A	N/A	N/A
5.5 Fire Prevention and Control								

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 availability of sufficient firewater tie-in points and following of the requirements of Local Authorities must be ensured.	C	<p>The auditor observed various firewater pipelines and tie-in points (colour coded in red).</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	None	None.	N/A	N/A	N/A
<b>5.6 Materials handling</b>								
	Storage of flammable stocks must be in a secure area with proper fire fighting equipment and hazard signs.	C	<p>The flammable stocks for sale are stored in a secured bunded area with serviced firefighting equipment and appropriate hazard signs.</p> <p>This is also consistent with the requirements of the <i>Storage of Flammable and Consumable Fluids</i> procedure.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> <li>Storage of flammable and consumable fluids (SSP-S-059)</li> </ul>	None	None.	N/A	N/A	N/A
	When off-loading hazardous chemicals, all operations must be stopped immediately if a leak in	C	All operations are monitored via the digital control room where operations can	None	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)
	the connecting line occurs. This operation must not continue until the spillage has been removed.		<p>immediately be stopped in case of a spillage event. The auditor was informed that there are procedures in place for the clean up and remediation of spillages before operations continue.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> <li>Visual Site Observation</li> <li>Spillage Handling Procedure (PE3-GEN-OTM-002)</li> </ul>					
<b>5.7 Noise</b>								
	It must be ensured that equipment is in a good state of maintenance to prevent elevated noise levels	C	<p>During the audit, no equipment showed degradation that result in elevated noise levels.</p> <p>However, the perimeter noise survey indicates that Poly 3 plant exceeded with noise rating levels above the allowable limits hence, preventative control measures are implemented such as double ear protection.</p>	None	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>The Poly 3 plant noise surveys are conducted regularly according to a set schedule. The primary source of noise at the plant is steam leaks, and notifications are generated for each leak detected, followed by arrangements for repairs. Scheduled maintenance is organized using the SAP planned maintenance system to ensure the plant equipment remains in optimal working condition.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Noise exposure verification and assessment for hearing conservation purposes (SEO-217-2022-EN-N) dated 08 March 2023</li> <li>Verbal Confirmation</li> <li>Visual Site Observation</li> </ul>					
<b>5.8 Soil</b>								
	The site must be paved, where the highest potential environmental impacts will be, to	<b>C</b>	The auditor identified that the Poly 3 plant is located in a highly industrialised area of	None	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)
	manage the impact of the project on the ecology of the site.		<p>Midlands site, therefore any project impact on the environment or the ecology of the site is manageable.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> <li>Verbal Confirmation</li> </ul>					
<b>5.9 Solid Waste Management</b>								
	All waste material must be contained and disposed off according to the relevant legal requirements	<b>C</b>	<p>The auditor observed during the site visit that all the waste is contained and disposed of as per waste licenses and manifests to confirm disposal.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	None	None.	N/A	N/A	N/A
	All domestic waste generated must be disposed of in a proper manner at a licenced landfill site	<b>C</b>	Sasol Midlands follows the procedure for waste removal (SSP-S-014). This specific procedure adheres to an integrated waste management approach. The auditor observed various waste manifest for the current audit period.	None	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>Procedure for the removal of waste from the SEO Sasolburg Sites (SSP-S-014, Revision 7) dated 01 August 2022</li> </ul>					
	Polyethylene granule spillages will be contained and separated by skimmer in order to minimize the amount entering the water systems.	C	<p>The auditor noted that a skimmer is used to effectively capture polyethylene granules, preventing them from contaminating the water systems.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	None	None.	N/A	N/A	N/A
	Any equipment being removed from the site must be decontaminated prior to storage or disposal.	C	<p>The auditor was informed that this process is conducted in accordance with established Sasol procedures for the handling and removal of redundant or faulty equipment.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> </ul>	None	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)
	Any hazardous waste generated must be disposed off at an appropriately classified waste site (unless it is to be recycled by approved methods). Records should be kept of the disposal of all hazardous waste being disposed of or recycled.	C	<p>The catalyst and lagging material used for insulation is treated as hazardous waste – this applies to shut down. There is not hazardous waste during operation unless there is an upset condition at the Poly 3 plant. Waste is removed in accordance with established waste management procedure, and records are maintained through waste manifests.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> <li>Procedure for the removal of waste from the SEO Sasolburg Sites (SSP-S-014) dated 01 August 2022</li> </ul>	None	None.	N/A	N/A	N/A
	All sub-spec polyethylene product will be sold to plastic recyclers	C	<p>Sasol personnel confirmed that this practice is in place and all sub-spec product is sold to plastic recyclers</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> </ul>	None	None.	N/A	N/A	N/A

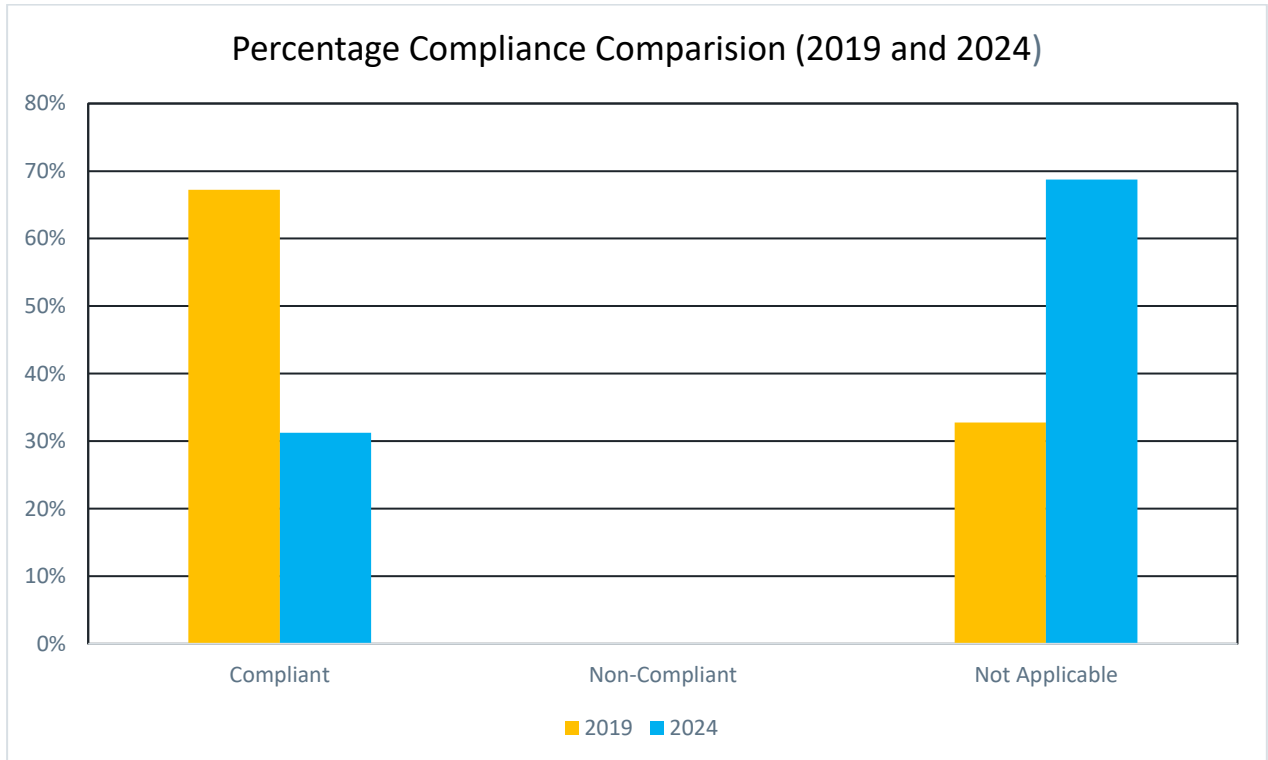
Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
	In general, littering, discarding or burying of any materials must not be allowed on site.	C	<p>No littering, discarding or burying of material was observed on site during the audit. There are skips and bins in various places on site to ensure appropriate disposal of waste</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	None	None.	N/A	N/A	N/A
	The operator should raise awareness under staff to the need to refrain from indiscriminate waste disposal and/or pollution of local soil and water resources.	C	<p>Sasol personnel confirmed that environmental management awareness training to staff, service providers, contractors and visitors is provided to ensure that everyone employed or acting on their behalf is aware that they need to comply with the EA and the EMPR conditions which includes waste and water compliance conditions.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Verbal Confirmation</li> <li>Induction Materials</li> <li>Online Training Matrix</li> </ul>	None	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>5.10 Storage Tanks and Equipment</b>								
	Regular monitoring of the tanks and pipelines must be undertaken to prevent pollution. Should contamination be detected, a rehabilitation plan must be compiled and executed.	C	<p>Focal monitoring occurs in the Digital Control system where the team observes the tanks and pipelines in real time. No visible contamination was evident during the audit period.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Incident register 2021-2022</li> <li>Incident register 2023-2024</li> <li>Visual Site Observation</li> </ul>	None	None.	N/A	N/A	N/A
	The leak detectors must be regularly tested and records kept.	C	<p>The auditor identified that there are gas detectors at the Poly 3 plant. Statutory inspections, Risk-Based Inspections (RBI), and daily plant inspections are conducted to maintain the equipment in optimal operating condition. If any defects are detected, the SAP system is utilised to document these issues.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	None	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)
	All machinery must be maintained in good working order as to prevent soil or water pollution from oil, fuel or other leaks.	C	<p>The Poly 3 plant has a concrete surface. All equipment that could cause a spill is contained within a bunded area with a concrete surface.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> <li>Visual Site Observation</li> </ul>	None	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**. No progress was noted from the 2019 report as there were no non-compliances reported. The 2024 audit identified zero non-compliant conditions.



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

## 6 SUMMARY OF THE AUDIT FINDINGS

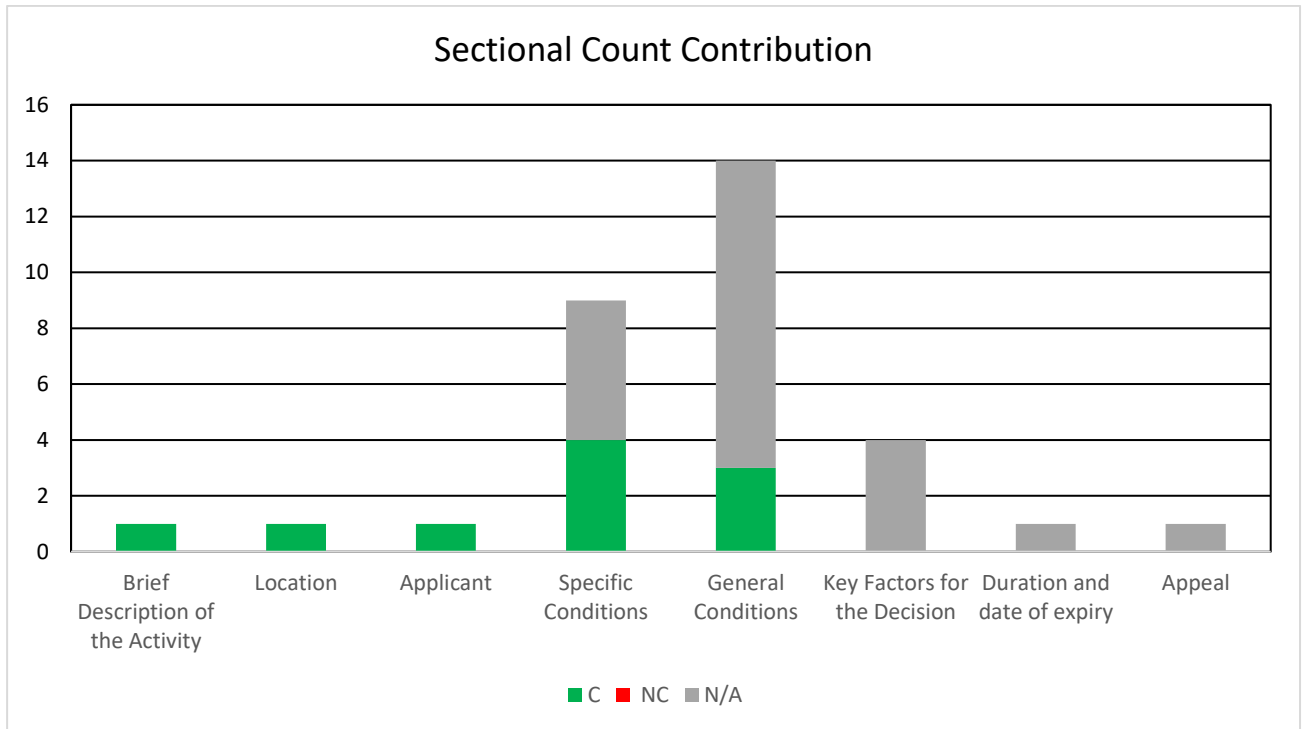
### 6.1 SASOL SASOLBURG POLY 1 & 3 EA COMPLIANCE

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.

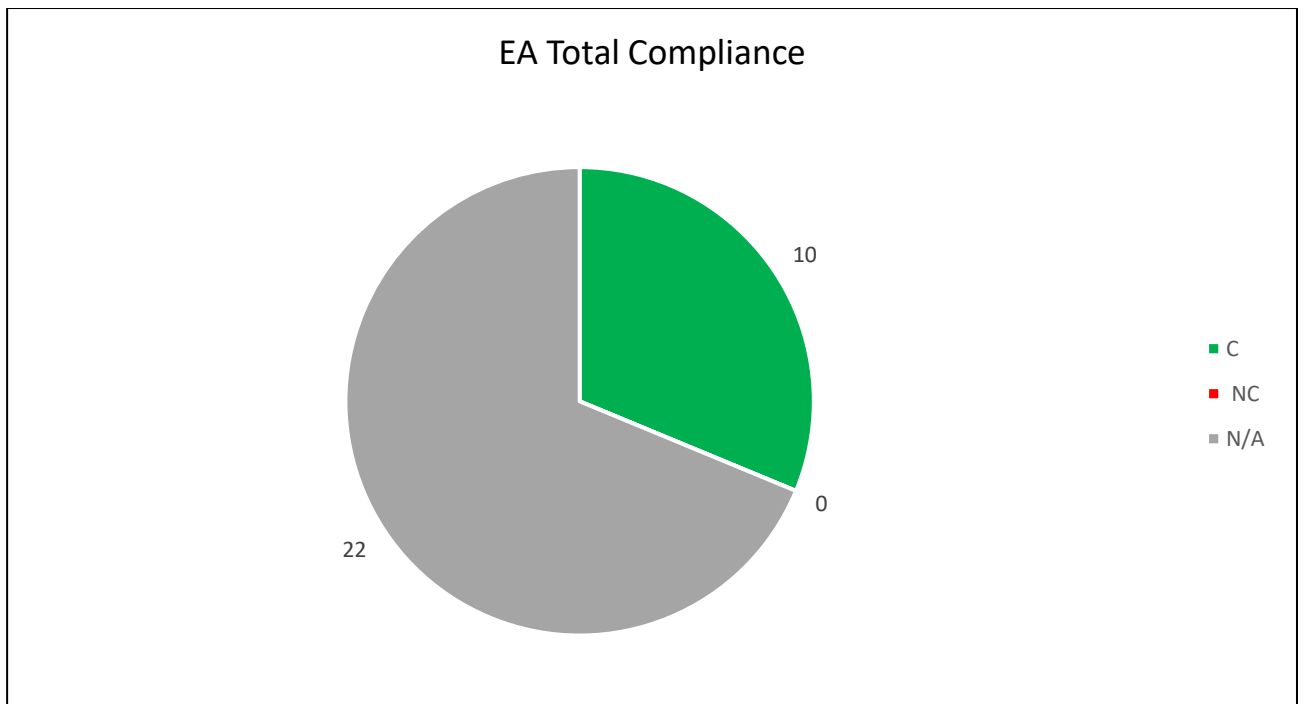
**Table 6-1 - Summary of EA Compliance Audit Findings**

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
Specific Conditions	9	4	0	5
General Conditions	14	3	0	11
Key Factors for the Decision	4	0	0	4
Duration and date of expiry	1	0	0	1
Appeal	1	0	0	1
Total	32	10	0	22
Total Percentage		31%	0%	69%
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.

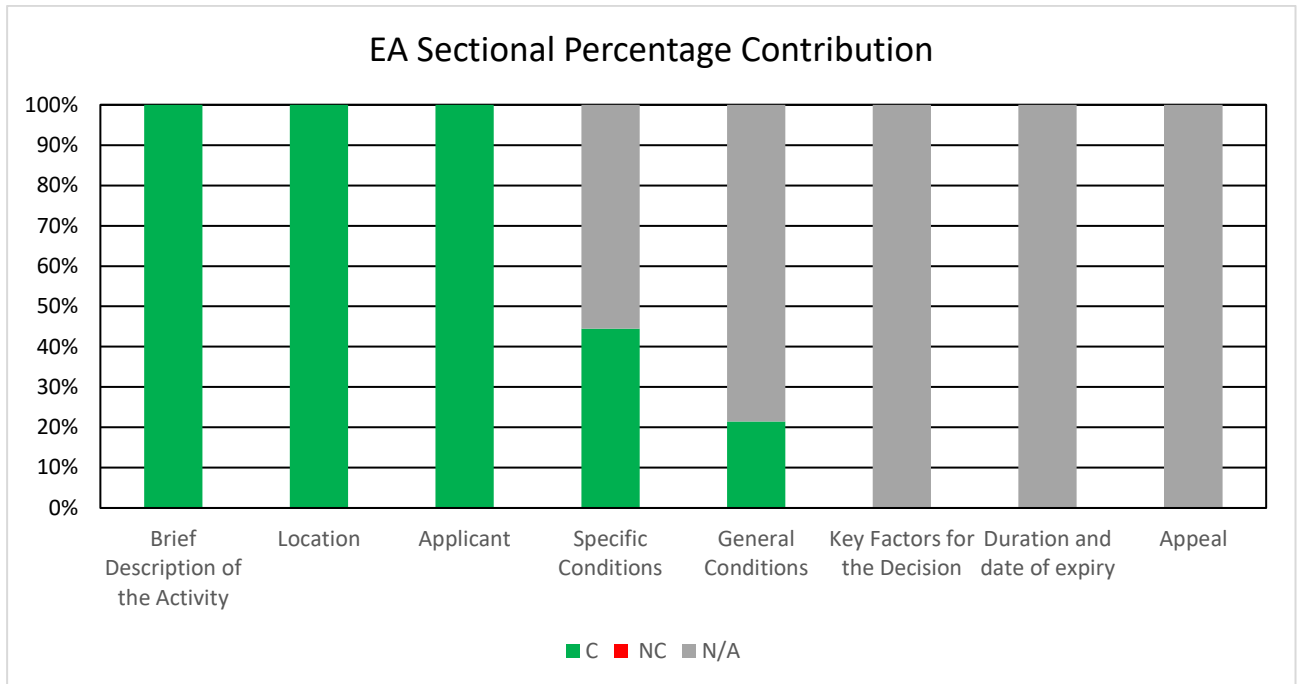


**Figure 6-1 - Number/Count contribution of findings made to the EA conditions per section**

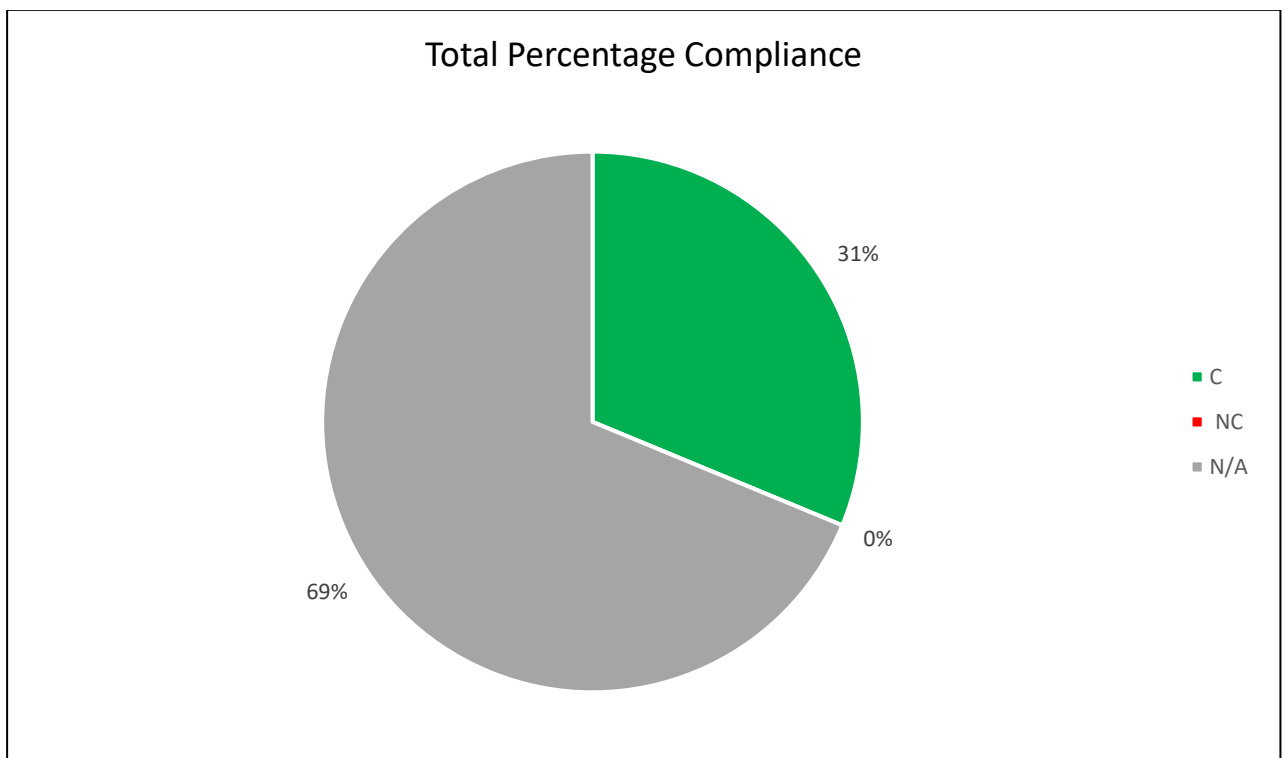


**Figure 6-2 - Overall count findings on compliance to the EA commitments**

**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**



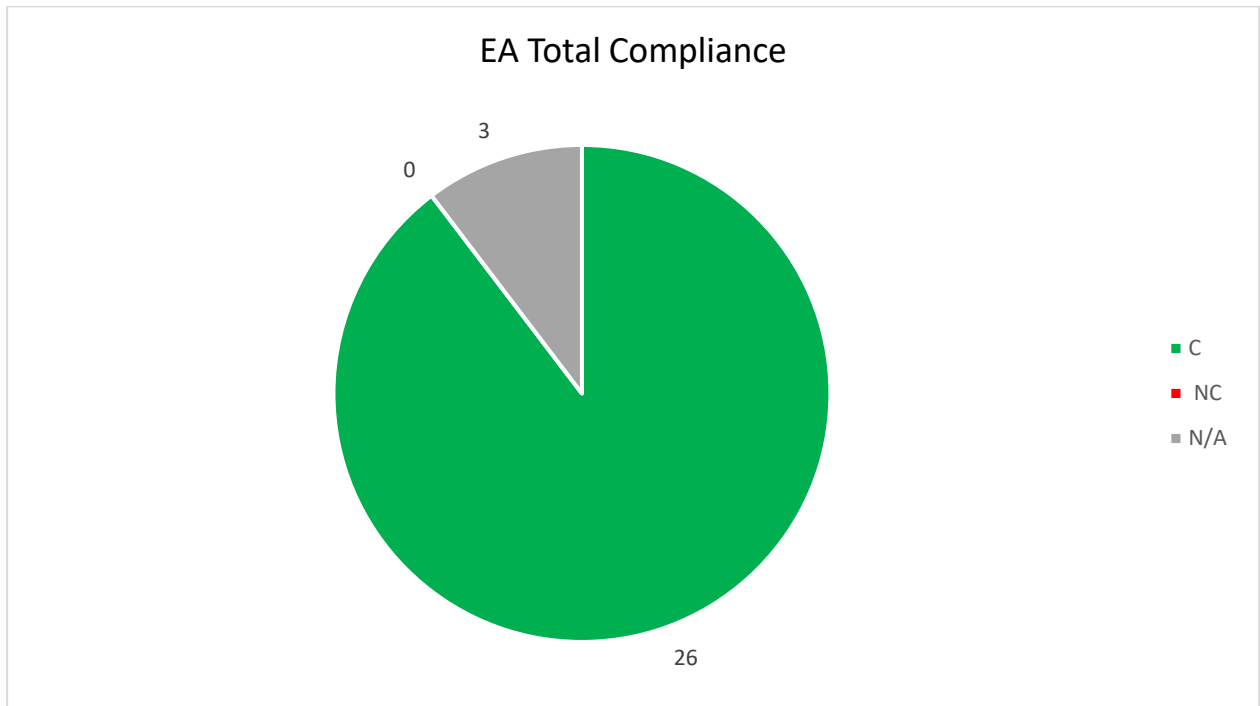
## 6.2 SASOL SASOLBURG POLY 1 & 3 EMPR COMPLIANCE

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.

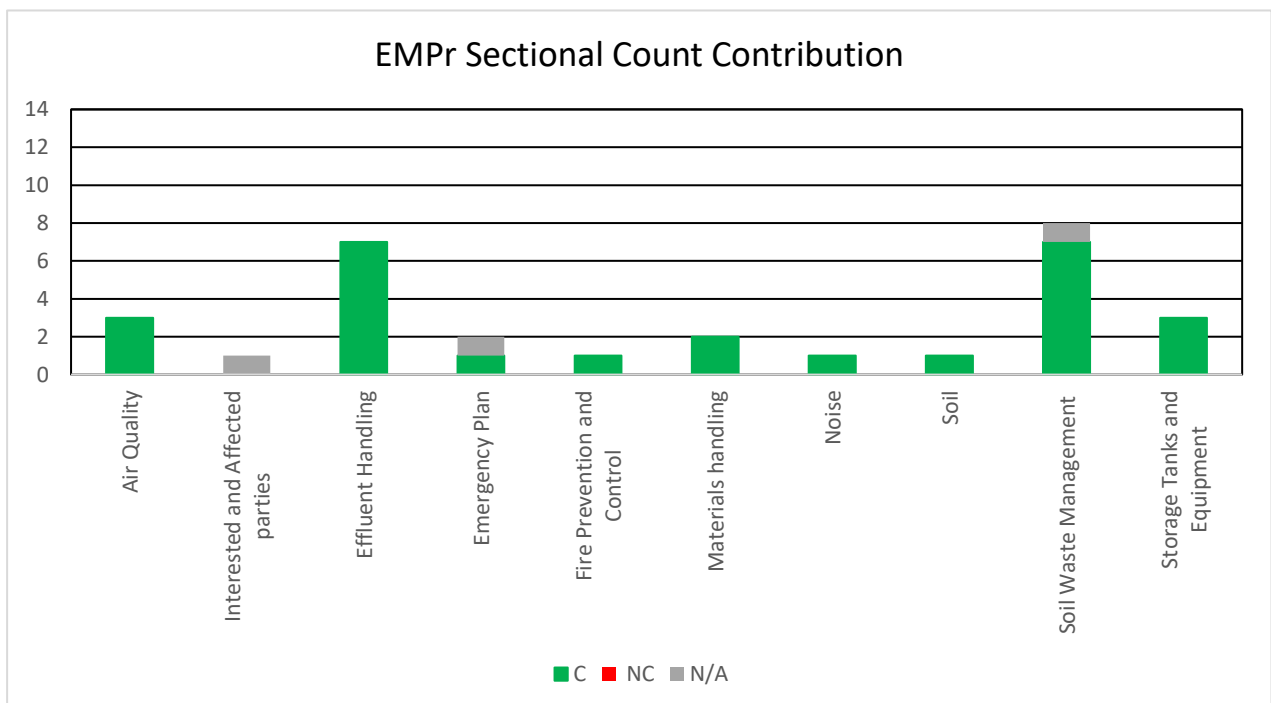
**Table 6-2 - Summary of EMPr Compliance Audit Findings**

Section of the EMPr	No. Commitments	C	NC	N/A
Air Quality	3	3	0	0
Interested and Affected parties	1	0	0	1
Effluent Handling	7	7	0	0
Emergency Plan	2	1	0	1
Fire Prevention and Control	1	1	0	0
Materials handling	2	2	0	0
Noise	1	1	0	0
Soil	1	1	0	0
Soil Waste Management	8	8	0	0
Storage Tanks and Equipment	3	3	0	0
Total	29	27	0	2
Total Percentage		90%	0%	10%
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.

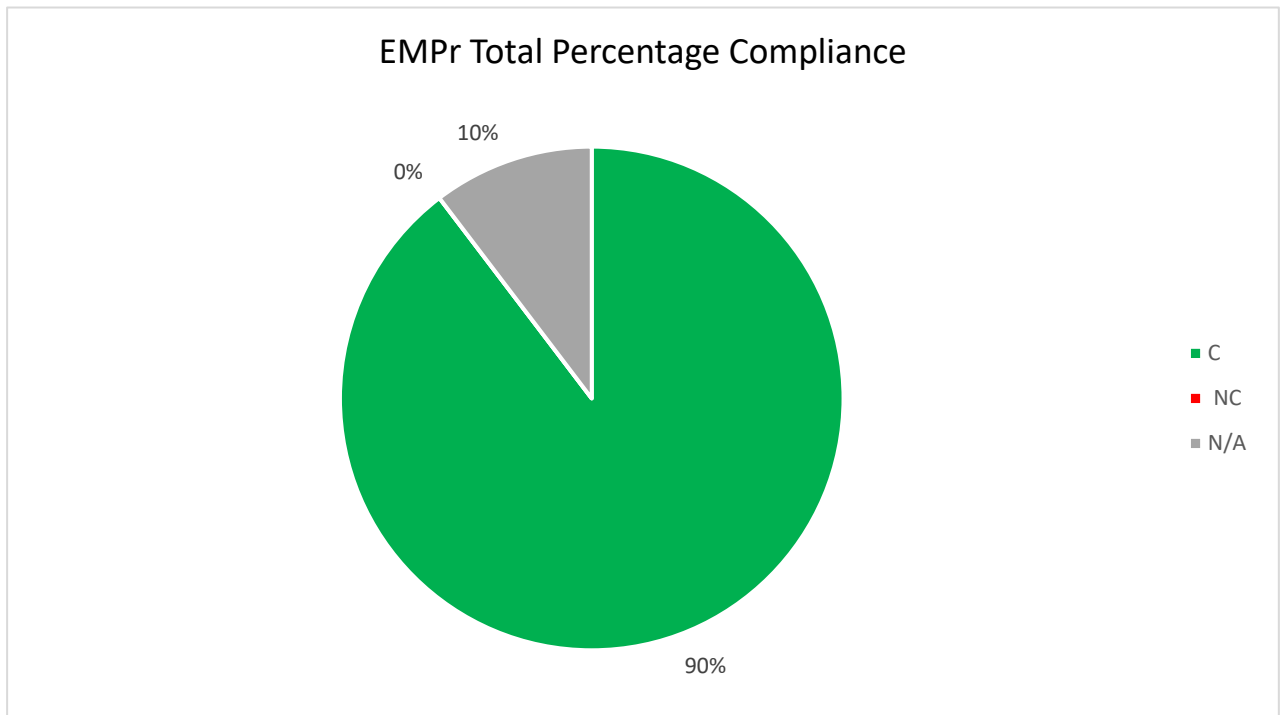


**Figure 6-5 - Overall count findings on compliance to the EMPr Commitments**

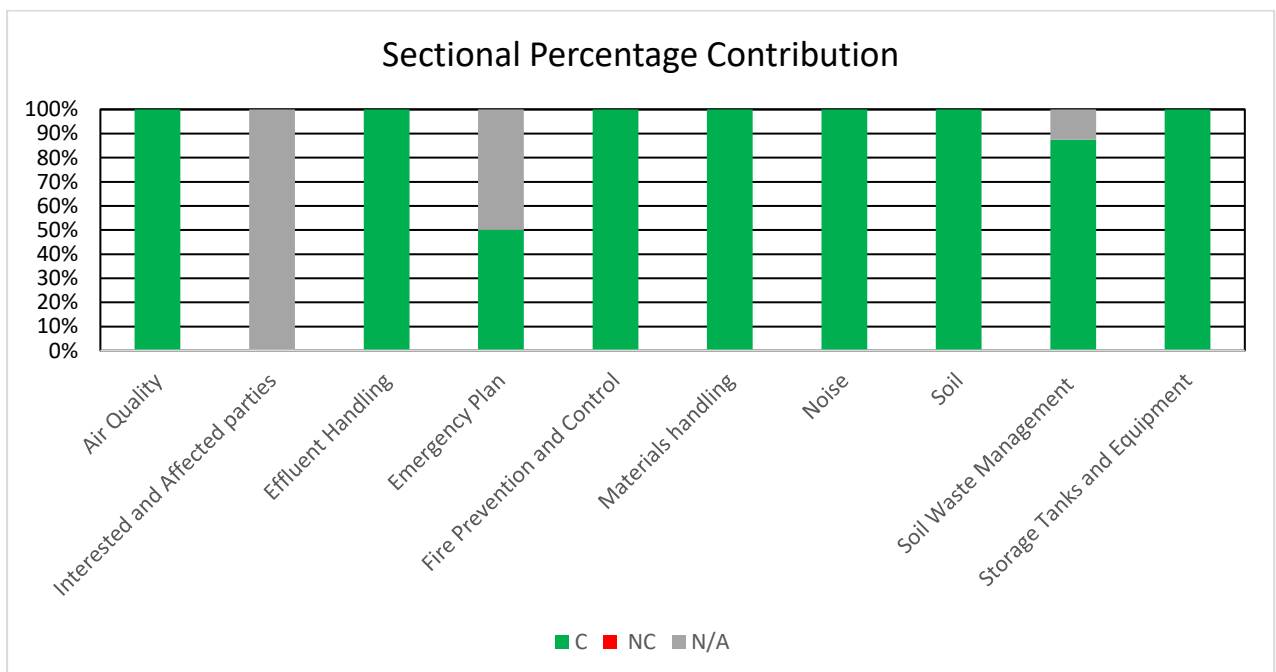


**Figure 6-6 - Number/Count contribution of findings made to the EMPr Commitments per Section**

**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 and EMP conditions. Sasol is advised to continue to ensure compliance with the EA and EMP conditions.

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 utilise 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 Poly 1&3 and compared the operations to the approved EMPr and compiled this report to the best of my knowledge. This section should be read with **Section 2**.

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

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

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

# Appendix A

## AUDITOR CVS



## Matilda Mbazo

Earth and Environment, Environmental Planning & Advisory, Graduate Consultant

### CAREER SUMMARY

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



**2 > years with WSP**

#### Language

Afrikaans, English, Tswana, Ndebele, and Zulu

### EDUCATION

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

### PROFESSIONAL MEMBERSHIPS

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

### PROFESSIONAL HISTORY

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

### PROFESSIONAL EXPERIENCE

#### Environmental Authorisation Audits

FFS Chloorkop Fired Heater





July 2022 to June 2023

**ECO:** EA and EMPR Compliance Audit

**Environmental Auditor :** EA and EMPr Annual Compliance Audit

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

October 2022

October 2023

July 2024

**Environmental Auditor**

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

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

November 2023

**Environmental Auditor :** EA and EMPr Compliance Audit

**Impala Platinum Holdings Limited**

June 2024

**Environmental Auditor :** Norms and Standards Audit

**Sasol South Africa Limited and Wood**

July 2024 – July 2025

**ECO:** EA and EMPR Compliance Audit

**Sasol Ekandustria Operations**

September 2024 – September 2025

**ECO:** EA, EMPR and WUL Compliance Audit

**Investchem (Pty) Ltd**

September 2024

**Environmental Auditor :** EA and EMPr Compliance Audit

**Environmental Management Plans**

**ArcelorMittal South Africa, South Africa**

April 2024

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

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

June 2024



Environmental Management Plan for the proposed Hybrid Project.

**ENERTRAG, South Africa**

2024

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

**Legal Audits**

**Sasol South Africa Limited**

March 2024

Undertaken the Regulation 34 Compliance Audits for various Third Parties

**Barloworld Ingrain**

April 2024

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

**Renewables**

**ENERTRAG, South Africa**

2024

Scoping and Environmental Impact Assessment for Impumelelo Wind Facility

**Eskom Holdings SOC Ltd**

September 2024

Part 2 amendment of an EA for a solar facility

**Dissertations and Research Projects**

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

**2023-2024**

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

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

**2022**

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



## Yvette Mmanasoe

Senior Consultant

### CAREER SUMMARY

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



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#### *1 years with WSP*

#### *8 years of experience*

#### *Area of expertise*

Public Participation Process  
Social Impact Assessment  
IFC Principles

#### *Language*

English, Sepedi, Afrikaans, Sesotho, Setswana, Zulu

### EDUCATION

BSc Environmental Geography	2015
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### ADDITIONAL TRAINING

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

### PROFESSIONAL MEMBERSHIPS

IAIASA  
2023



## Yvette Mmanasoe

Senior Consultant

### PROFESSIONAL HISTORY

WSP Group Africa (Pty) Ltd

August 2023 – present

Agron Moosrivier (Pty) Ltd

July 2015 – April 2023

### PROFESSIONAL EXPERIENCE

#### Area of expertise

#### Sub-area (if required)

**Thungela Resources, Zibulo Underground Extension Mine, RSA**

**Year 2021/2022**

#### Role

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

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

**Year 2019/2020**

#### Role

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

**Kriel Housing Development, Kriel Housing Development, RSA**

**Year 2019/2022**

#### Role

Conduct SIA for the BAR Process



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

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## Annexure B – Sasol Polythene Plant 3

### Environmental Management Programme Operational Phase

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

Impact management Objective	Impact management Actions
<b>1. Air Quality</b> Minimise the potential for deterioration of air quality	1.1. Gas leak detection instruments will be installed to detect any gas leaks at an early stage
	1.2. Efficient operation of the plant will be managed within current operating procedures in order to minimize upset conditions which may lead to unscheduled flaring
<b>2. Effluent Handling</b> Minimise the use of clean water and avoid water wastage Prevent the contamination of surface and ground water as a result of Polythene 2's activities	2.1. Clean stormwater systems should be kept separate from potentially contaminated stormwater and wastewater streams, as per current operations. All water effluent will be routed to the existing Midland effluent system
	2.2. Polyethylene granule spillages will be contained and cleaned-up in order to minimize the amount entering the water systems.
	2.3. Should an accidental spill event occur, then the effluent will be contained and managed by means of the chemical sewer.
	2.4. Contamination of the surface and ground water and soil will be prevented at the flare knock-out pot.
	2.5. Contamination of the surface and ground water and soil as a result of oil spills from the compressors will be minimized within current operational and maintenance procedures. .
	2.6. Waste slop oil will be sold as burner oil as far as possible
	2.7. All loading of products will be done in bunded areas to contain any possible spills.
<b>3. Emergency Plan</b> Ensure that an appropriate Emergency Procedure is in place to safeguard the environment	3.1. An emergency plan should be available for major environmental emergencies during operation activities (with consideration of air, groundwater, soil and surface water) and appropriate training must be provided therein.
<b>4. Fire prevention and control</b> Ensure that an appropriate Emergency Procedure is in place to safeguard the environment	4.1. Ensure the availability of sufficient firewater tie-in points and following
	4.2. Training must be provided to the staff members in the use of the appropriate fire-fighting equipment.

<p>5. <b>Materials handling</b> Manage and use land, raw materials and resources responsibly in order to minimise the disturbance of the prevailing ecology</p>	<p>5.1. Storage of flammable stocks for sale must be in a secure area with proper firefighting equipment and hazard signs</p>
	<p>5.2. When off-loading hazardous chemicals all operations must be stopped immediately if a leak in the connecting line occurs. This operation must not continue until the spillage has been removed.</p>
<p>6. <b>Noise</b> Avoid “disturbing” noise levels</p>	<p>6.1. It must be ensured that equipment is in a good state of maintenance to prevent elevated noise levels.</p>
<p>7. <b>Soil</b> Prevent the contamination of surface and ground water as a result of</p>	<p>7.1. The site must be paved, where the highest environmental impacts will be, to manage the impact of the project on the ecology of the site.</p>
<p>8. <b>Solid Waste</b> Prevent the contamination of surface and ground water</p>	<p>8.1. All waste material must be contained and disposed of according to the relevant legal requirements</p>
	<p>8.2. All domestic waste generated must be disposed of in a proper manner at a licenced landfill stie</p>
	<p>8.3. Polyethylene granule spillages will be contained and separated by skimmer in order to minimize the amount entering the water systems.</p>
	<p>8.4. Any hazardous waste generated must be disposed of at an appropriately classified waste site (unless it is to be recycled by approved methods). Records should be kept of the disposal of all hazardous waste being disposed of or recycled.</p>
	<p>8.5. All sub spec polyethylene product will be sold to plastic recyclers.</p>
	<p>8.6. In general, littering, discarding or burying of any materials must not be allowed on site.</p>
	<p>8.7. The operator should raise awareness under staff to the need to refrain from indiscriminate waste disposal and/or pollution of local soil and water resources.</p>
<p>9. <b>Storage Tanks</b> Prevent the contamination of surface and ground water and air</p>	<p>9.1. Regular monitoring of the tanks and pipelines must be undertaken to prevent pollution. Records of monitoring must be kept and made available to the FS-DTEEA / DWS on request. Should contamination be detected, a rehabilitation plan must be compiled and executed</p>
	<p>9.2. The leak detectors must be regularly tested, and records kept.</p>
	<p>9.3. All machinery must be maintained in good working order as to prevent soil or water pollution</p>