



Our reference: SO-ENV-1341

29 November 2024

Your Ref: EA nr EM1/1(c)00/30

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Attention: Deputy Director: Environmental Impact Assessment

ENVIRONMENTAL AUTHORISATION EXTERNAL REPORT SUBMISSION

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

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

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

Attached, please find the compliance audit report for the establishment of the Sasol Upgrading SASCON road facility, Construction of OSB, Environmental Authorisation with reference EM1/1(c)00/30, dated October 2024.

Sasolburg and Ekandustria Operations

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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 Upgrading SASCON road facility, Construction of OSB.

Yours faithfully,

Signed by: Johann Van Wyk
Signed at: 2024-11-29 12:56:38 +02:00
Reason: I approve

Johann Van Wyk

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Annexure A

Audit report.

Upgrading SASCON road facility, Construction of OSB– ref [EM1/1(c)00/30]



Sasol South Africa Ltd

**ROAD LOADING FACILITY AND NEW OIL
SEPERATION BASIN (OSB) ENVIRONMENTAL
AUTHORISATION (REF. NO: EM1/1(C)/00/30)
AND ENVIRONMENTAL MANAGEMENT
PROGRAMME AUDIT**

Compliance Audit Report: November 2024 - July
2024





Sasol South Africa Ltd

**ROAD LOADING FACILITY AND NEW OIL
SEPERATION BASIN (OSB) ENVIRONMENTAL
AUTHORISATION (REF. NO: EM1/1(C)/00/30)
AND ENVIRONMENTAL MANAGEMENT
PROGRAMME AUDIT**

Compliance Audit Report: November 2024 - July 2024

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DATE: OCTOBER 2024



Sasol South Africa Ltd

ROAD LOADING FACILITY AND NEW OIL SEPERATION BASIN (OSB) ENVIRONMENTAL AUTHORISATION (REF. NO: EM1/1(C)/00/30) AND ENVIRONMENTAL MANAGEMENT PROGRAMME AUDIT

Compliance Audit Report: November 2024 - July 2024

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QUALITY CONTROL

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Checked by	Anri Scheepers			
Signature				
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AUDITOR CVS

1 INTRODUCTION

1.1 TERMS OF REFERENCE

WSP Group Africa (Pty) Ltd (WSP), as an independent environmental consultant, was appointed by Sasol Operations, a division of Sasol South Africa Limited, to undertake an external environmental compliance audit of the commitments contained in the Environmental Authorisation (EA) (reference number EM1/1(C)/00/30) for the Road Loading Facility (RLF) and the New Oil Separation Basin (OSB) and the associated Environmental Management Programme (EMPr), and to compile an audit report according to the requirements of the National Environmental Management Act (No. 107 of 1998), as amended (NEMA).

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

- RoD for the RLF and OSB unit located at the Sasol One site in Sasolburg (reference number: EM1/1(C)/00/30), dated 04 May 2000 and issued 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 for the RLF and OSB located at the Sasol One site in Sasolburg (reference number: EM1/1(C)/00/30), dated 12 February 2018 and issued by the DESTEA. The amendments include:
 - Change of the brief description of the activity;
 - Change of location;
 - Change the applicant details on the EA;
 - Owner of the EA
 - Contact details and address
 - Change of the last condition under key factors for the decision of the EA.
- The second amendment of the EA for the RLF and OSB located at the Sasol One site in Sasolburg (reference number: EM1/1(C)/00/30), dated 22 October 2019 and issued by the DESTEA. The amendments include:
 - Change of responsible person and company name (from Sasol South Africa (Pty) Ltd to Sasol South Africa Ltd)
- EMPr included in the Environmental Impact Assessment EIA Report, dated March 2000.

1.2 SASOL SASOLBURG – ROAD LOADING FACILITY AND THE NEW OIL SEPERATION BASIN

The Road Loading Facility (RLF) entails the routing of the vapours resulting from the top loading of road tankers from the loading racks installed at Sasol One Site, to a vapour control unit (VCU). The vapours are collected through a conical manifold at the loading racks and transported to the VCU

where they are ignited. The emissions from the unit are predominantly NO (nitrogen monoxide) and CO (carbon monoxide). A minimum of 99% of vapours is removed from the racks through this facility, making it highly effective.

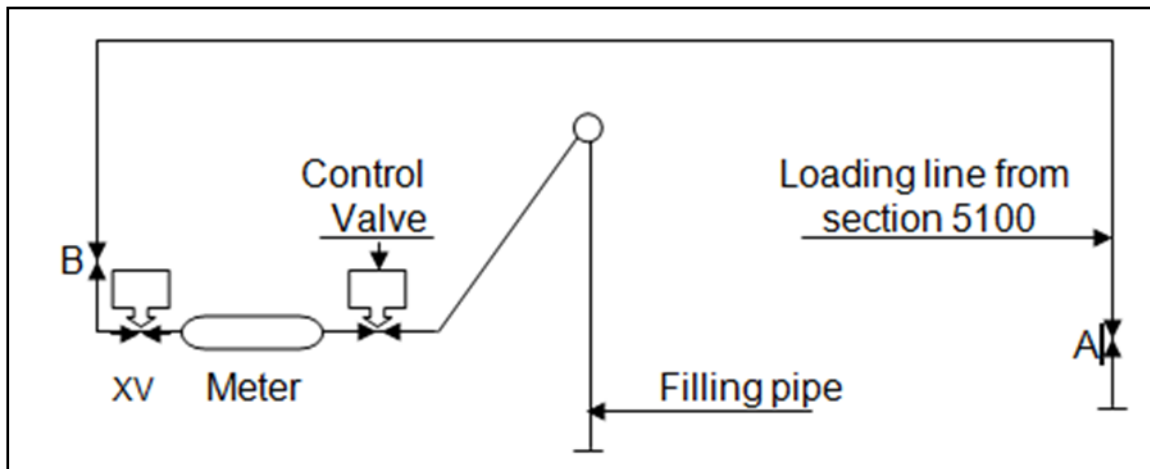


Figure 1-1 - Loading System at the facility

The Oil Separation Basin (OSB) was initially located on Sasol One site close to the RLF, hence the two facilities are administered on one EA. The New OSB is now located on the western side of the Sasol One Waste Site, next to the coarse ash and historical Fine Ash Dam (FAD) 1 facility. The New OSB receives wastewater and contaminated storm water from the main Sasol One Site.

The combined wastewater stream from the New OSB is routed directly to the Bioworks, or if it is out of specification and not suitable for direct treatment, it can be routed to either of the emergency dams for containment by opening and closing sluices. If the Industrial Sewer (IS) contains high levels of contaminants that can potentially harm the Bioworks operations, the stream can be rerouted to the New Emergency Dam where it can be contained and managed.

The basin is cleaned as and when required according to an operations and maintenance strategy.

1.3 PROJECT TEAM

WSP auditors, Matilda Mbazo and Yvette Mmanasoe, completed a site inspection of the RLF and OSB on **17 July 2024**.

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

The project team is summarised in

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

Table 1-1 - Details of the Audit Team

Audit Team	Role	Experience
Anri Scheepers	Review	BA (Hons) Geography
		15 Years' Experience
		Anri graduated from the University of Johannesburg with a BA honours in Geography in 2007 and has 15 years' work experience. Anri is qualified as a Lead Auditor and has undertaken legal compliance auditing, including environmental authorisations, waste management licences, water use licences and EMPs. In addition, she has undertaken general site assessments to determine compliance against local, provincial, and national environmental legislation
Matilda Mbazo	Auditor	BSc (Hons) Geography
		2 years' Experience
		Matilda graduated from the University of Wits with a BSc honours in Geography in 2023 and is currently completing her master's in environmental science. She has 1 year experience in environmental management and currently provides technical and strategic input on a diverse range project in environmental management and environmental compliance audits.
Yvette Mmanasoe	Auditor	BSc Environmental Geography
		8 Years 'Experience
		Yvette has 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 RLF and OSB at the Sasol One site, 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 for the RLF and OSB;
- Assess the level of compliance with the commitments of the EMPr that was submitted as part of the EIA Report for the licencing of the RLF and OSB, as agreed and approved by the DESTEA;
- Assess the extent to which the avoidance, management and mitigation measures provided for in the EMPr for the operation of the RLF and OSB was implemented;
- Identify and assess any new impacts and risks that result from undertaking the activity;
- Critically evaluate the effectiveness of the EMPr;
- Identify shortcomings in the EA and EMPr; and
- Identify the need for any changes to the avoidance, management and mitigation measures provided for in the EA and EMPr conditions.

The 2014 EIA Regulations (as amended) are considered applicable to the RLF and OSB unit 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 of 2014 (as amended) outlines the required audit report content. The 2014 EIA Regulations, as amended, refer to a minimum audit frequency of five years. This audit was conducted to meet the requirements of Regulation 34 of the EIA Regulations, 2014 (as amended). **Table 2-1** indicates where the requirements of Section 34 and **Appendix 7** are met within this audit report.

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

Sub-Section	Requirement	Report Section Reference
34 (2)a	The environmental audit report must be prepared by an independent person with the relevant environmental auditing expertise.	Sub-section 1.3 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	Section 4

Sub-Section	Requirement	Report Section Reference
	(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	
3(b)	The environmental audit report must determine the level of compliance with the provisions of environmental authorisation, EMPr and where applicable, the closure plan.	Section 4
4(a)	Where the findings of the environmental audit report indicate: (a) insufficient mitigation of environmental impacts associated with the undertaking of the activity (b) insufficient levels of compliance with the environmental authorisation or EMPr the holder must, when submitting the environmental audit report to the competent authority submit recommendations to amend the EMPr or closure plan in order to rectify the shortcomings identified in the environmental audit report	Section 4
a	Details of- (i) the independent person who prepared the environmental audit report; and (ii) the expertise of independent person that compiled the environmental audit report.	Sub-section 1.3 CVs provided in Appendix A
b	A declaration that the independent auditor is independent in a form as may be specified by the competent authority.	Sub-section 9
c	An indication of the scope of, and the purpose for which, the environmental audit report was prepared.	Sub-section 1.1 and Section 2
d	A description of the methodology adopted in preparing the environmental audit report.	Section 3
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

Sub-Section	Requirement	Report Section Reference
f	A description of any assumptions made, and any uncertainties or gaps in knowledge.	Sub-sections 2.2
g	A description of any consultation process that was undertaken during the course of carrying out the environmental audit report.	Not applicable.
j	A summary and copies of any comments that were received during any consultation process.	Not applicable.
k	Any other information requested by the competent authority.	Not applicable.

2.1 DISCLAIMER

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

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

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

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

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

3.1 AUDIT CHECKLIST

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

3.2 SITE INSPECTION AND INTERVIEWS

An onsite inspection was conducted on **17 July 2024** during which findings and observations were recorded, as detailed in **Section 4**. Key personnel interviewed during the audit included:

- Suyen Van Zyl – SHE Environmental Specialist;
- Shane Van Rooyen – Area Manager (RLF);
- Smanga Hlatshwayo - Area Manager (RLF);
- Tommie Bezuidenhout – Area Manager (OSB).

3.3 INFORMATION CONSIDERED

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

- Environmental Authorisation (Reference number: EM1/1(C)/00/30) dated 04 May 2000;
- Amendment of an Environmental Authorisation (Reference number: EM1/1(C)/00/30) dated 12 February 2018 and 22 October 2019;
- EMPr included in the EIA dated March 2000;
- Notification of Change of Contact Details of the Business Representative (Reference number: SO-e Groundwater Monitoring Report: WUL Compliance (41105760) dated August 202nv-1285) dated 08 July 2024;
- SOP for Cleaning of Equipment in LBS with Plant Utilities (SL-LBS-SOP-022) dated 07 October 2023;
- Safe Disposal Certificate for OSB sludge dated 15/08/2022;
- External Audit of EA/RoD/EMP/EMPr: Site Services: Upgrading Sascon Road Facility, Construction of OSB-Dam (CEM2019/078) dated 11 November 2019;
- External Audit submission (SO-env0619) dated 29 November 2019;

- Baseline Health Risk Assessment (Ref: SEO-079-2023-CRS-HRA) dated 04 September 2023;
- Air Emissions Licence (AEL) (Reference number: FDDM-MET-2013-22) dated 23 August 2023;
- Integrated Water and Waste Management Plan (IWWMP) Rev 7 – report number: SO-env-1192 (Sasolburg Operations, December 2023) that includes the:
 - Stormwater Management Plan (SWMP, 2023);
 - Rehabilitation Strategy and Implementation Plan (RSIP);
 - Water Conservation and Demand Management (WC/DM);
 - Malfunctions register;
 - Water management;
 - Groundwater management;
 - Waste management;
 - Contaminated Water and Wastewater Management;
 - Effluent Management; and
 - Land management.
- Waste Management and Disposal Registers;
- Sasol Annual Emissions Report (Reference number: FDDM-MET-2013-22-R1) dated 29 August 2023;
- Groundwater Monitoring Report: WUL Compliance (41105760) dated August 2023;
- Leakers List Survey results by Enserve Environmental Services dated April 2024;
- Client Report by Enserve Environmental Services dated April 2024;
- Repair Orders by Enserve Environmental Services dated April 2024;
- Sasol Civil Structural Integrity Inspection (81474144) dated 07 December 2023;
- Test Report: Waste Classification for Disposal by UIS Organic Laboratory;
- Incidents register;
- Environmental Standards; and
- Other related approvals documents.

3.4 ASSESSMENT EVALUATION METHODOLOGY

The consolidated report contains all commitments, which were formulated as part of the original and amended EA and EMP. Each commitment contained in the audit checklist was assessed by reviewing site documentation, interviewing employees, and undertaking a site inspection. The implementation of the mitigation measures in the EMP was assessed and the level of compliance rated (compliance categories contained in **Table 3-1**). The compliance of the operations listed in **Section 1.2** was assessed.

Table 3-1 Levels of Compliance

Compliance Level	Definition
Compliant (C)	When an activity or commitment has been implemented, completed, is on-schedule or is maintained on an ongoing basis. Condition/mitigation measure/commitment has been achieved with evidence provided in the form of a document or site verification.

Compliance Level	Definition
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 level of compliance with the conditions within the EA and associated amendments to the EA.

Table 4-1 - Environmental Authorisation (reference: EM1/1(C)/00/30 dated 04 May 2000) and Amendment (reference: EM1/1(C)/00/30 dated 12 February 2018 and 22 October 2019) Audit Findings

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
Brief Description of the Activity				
	The proposed activity involves the upgrading of the existing Loading Operations at Sasolburg Operations (that forms part of Sasol South Africa (Pty) Ltd) - previously known as Loading Operations road loading facility). Currently there exist seven loading racks at Loading Operations . The proposal involves the removal of 6 of these loading racks, and replacing them with two new top loading racks, having 5 loading points. The new arrangement will enable Loading Operations to handle increased loading throughput if required in future. To make provision for the trucks to enter the new facility, the OSB-dam (Oil separator Basin-dam), situated to the west will be filled. The new dam will be constructed on the SCI waste	C	<p>Noted. The Auditor was informed that the stated activity has not changed.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation EA (EM1/1(C)/00/30) dated 04 May 2000 	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	<p>disposal area, in a section of the channel which is used to convey the effluent from the existing OSB dam to the effluent dams</p> <p>Nitrogen purging (for road tanker trucks that require purging) will occur at the loading facility. No additional, inspection racks will be constructed for nitrogen purging.</p>			
Location				
	Sasol One Site on Farm Infrachem 465, Sasolburg	C	<p>It was confirmed during the site assessment that the authorised activity is carried out at the Sasol One site Complex, Farm Infrachem 465, as stated in the EA.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> EA location details (reference number EMB/07/08/247) Google Earth Visual Site Observation 	None.
Applicant				
	Mr. Rightwell Laxa, SVP Sasolburg Operations Sasol South Africa Ltd acting through its Sasolburg Operations, P.O. Box 1, SASOLBURG, 1947, Tel: 016 960 8001	C	According to the site-wide Department notification dated July 8, 2024, the Department has been informed of a change in the applicant's contact person. This does not involve a change of ownership. The accountable person and the contact details is changed from "Mr. Rightwell Laxa ", to the following:	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<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. 	
Special Conditions				
	The mitigation measures outlined in the scoping report must be implemented	C	This audit report serves as a confirmation of compliance with the mitigation measures outlined in the scoping report.	None.
	All waste produced during the construction phase must be removed and disposed of in a proper manner.	N/A	Noted. This condition is outside the current audit period and refers to a requirement prior to commencement and was therefore not audited	None.
	Emissions from the loading facility must be maintained within the acceptable emission standards as per Air Pollution Prevention Act.	C	The Volatile Organic Compound (VOC) emissions at RLF are monitored for the lower and higher altitude emissions. The Occupational Health Risk Assessment, dated September 2023, assesses the lower level, and it is noted in the report that there was no new health risks associated with long-term occupational exposure to chemical, physical, ergonomics and biological hazards.	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<p>Periodic sampling of the higher altitude emissions is conducted. It is stated in the Annual Emissions Report for the Sasolburg and Ekandustria Operations, dated 29 August 2023, that the VOC concentrations are within the limits stated in the site's Atmospheric Emission Licence (AEL).</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> ■ AEL (Ref: FDDM-MET-2013-22) dated 23 August 2023 ■ Baseline Health Risk Assessment (Ref: SEO-079-2023-CRS-HRA) dated 04 September 2023 ■ Annual Emissions Report (FDDM-MET-2013-22-R1) dated 29 August 2023 	
Standard Conditions				
	The applicant must advertise this record of decision.	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.
	This record of decision does not exempt any person from the requirements of any provision of any other law and does not purport to interfere with rights of any person who may have interest on property.	N/A	Noted. The current audit did not include a legal review of compliance of the Sasol Operations with all statutory requirements and whether Sasol complies with all statutory requirements and are in possession of all the necessary permits, authorisations or any other official documents.	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
Key Factors for the Decision				
	The applicant has complied with the regulations to the satisfaction of the department.	N/A	Noted.	None.
	There are no protected or red data plant and animal species on or near the site.	N/A	Noted	None.
	No historical, cultural or archaeological sites are found on the site	N/A	Noted	None.
	There are no sensitive areas (e g. wetlands) on the site where the plant will be located.	N/A	Noted	None.
	The unit will pose no visual impacts as the site is situated in an already industrialised area.	N/A	Noted	None.
	There will be no effect on ground water, surface water, fauna and flora as the loading facility is on the existing loading facility within the Sasol South Africa (Pty) Ltd acting through its Sasolburg Operations factory.	N/A	Noted	None.
Duration and date of expiry				
	This ROD is valid for 5 years from the date of approval, unless the plant is modified and/or relocated, in which case it becomes invalid.	N/A	Noted. The Auditor was informed that RLF and OSB facility has not been modified or relocated since the ROD was approved.	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
Appeal				
	<p>An appeal under Section 35(3) of the Act, must be done in writing within 30 days from the date on which this ROD was approved and should be directed to:</p> <p>The MEC: DEAT Free State Province BLOEMFONTEIN, 9300</p>	N/A	Noted. This condition is outside the current 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 level compliance with the conditions within the EMP that were included in the EIA (Scoping Report) for the RLF at the Sasol One site in Sasolburg, dated March 2000.

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)
Ground water								
	No increase in groundwater flow is expected as a result of the proposed project, i.e. no direct incremental impact;	C	The Auditor was informed that there is no increase in groundwater flow as the facility is already established and the groundwater sampling is conducted as per the requirements of the site's WUL. Moreover, the Groundwater report confirms all groundwater monitoring wells at Sasol One Site to be in good condition and	None.	N/A	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			<p>show no exceedance in flow.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> WUL (Ref: 14/C22K/FG/4958) Groundwater Monitoring Report: WUL Compliance (41105760) dated August 2023 					
	The SASCON site is paved which will prevent groundwater contamination;	C	<p>The RLF site is fully paved with concrete to prevent any groundwater contamination.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 	None.	N/A	N/A	N/A	N/A
	Section 5100 (final tank area) which will be used during the construction period for loading is paved and	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB	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)
	equipped with a stormwater system.		was in the operational phase during the audit period.					
	The infrastructure to handle stormwater at Section 5100 during the construction period does exist. The risk of contamination will be managed by having enough SACON personnel available at all times of loading. Temporary lights will be installed during the construction period, and firefighting equipment (additional to those already available on the trucks! will be made available at each tanker. Those tanks identified to having the highest risk in terms of a spillage will be managed by constructing a bund of soil around the coupling point.	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB was in the operational phase during the audit period.	None.	N/A	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
	The new OSB-dam will be constructed before the old dam is being filled to ensure that plant effluent can be handled without disruption. The new OSB-dam will be concreted to prevent groundwater contamination.	C	<p>Noted. Part of the condition is outside the audit period and refers to a construction requirement. The OSB was in operational phase during the audit period.</p> <p>The OSB consists of two concreted basins to prevent groundwater pollution during the receiving of effluent and the filtering process.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 		N/A	N/A	N/A	N/A
	The new area at SASCON at the loading racks will be sloped to a central drain. A sloping line (underground) will connect this drain to a chemical sump. All stormwater, firewater and	C	The Auditor was informed that the central drain is located underground and sloped as per the facility's design to allow effluent to flow to the chemical	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)
	spills will end up in this 9m3 sump. The sump will have an overflow that will be connected to the stormwater sewer and will always be CLOSED in prevent stormwater pollution.		<p>sump which is a closed system to prevent any stormwater contamination.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Site design layout Verbal Confirmation 					
	<p>Advantage is being taken of the opportunity to upgrade old or outdated equipment and processes to newer technology which will:</p> <ol style="list-style-type: none"> reduce the risk of pollution or directly reduce the level of pollution resulting from the facility. 	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB was in the operational phase during the audit period.	None.	N/A	N/A	N/A	N/A
	The new OSB dam will be concreted to prevent ground water and soil contamination.	C	The OSB consists of two concreted basins to prevent groundwater pollution during the	None.	N/A	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			receiving of effluent and the filtering process. <i>Evidence:</i> <ul style="list-style-type: none"> Visual Site Observation 					
	Groundwater monitoring pits, which will be frequently monitored, will be dug at the new OSB dam to ensure that a leakage could be detected.	C	The sump block system and designated monitoring wells (MW1 and MW2) on site are monitored biannually. The leak detection is visually inspected to observe any signs of blockage or interference of waste such as sludge from the water, signs of film or sheen which are leak indicators. <i>Evidence:</i> <ul style="list-style-type: none"> Groundwater Monitoring Report: WUL Compliance (41105760) dated August 2023 	None.	N/A	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			<ul style="list-style-type: none"> Sasol Civil Structural Integrity Inspection (81474144) dated 07 December 2023 					
	New loading racks, mass flow meters, new pumps and SAPR3 (business software) will be installed which will maximize this positive impact.	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB was in the operational phase during the audit period.	None.	N/A	N/A	N/A	N/A
Surface Water								
	During the construction period, the loading will be conducted at Section 5100 - placing additional pressure on those utilities. The required utilities are available at Section 5100. An expected 30 tankers per day will require loading during the construction period at this area.	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB was in the operational phase during the audit period.	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)
	Low-pressure steam is required for cleaning of lines / vessels before cutting of lines during construction and operation, and steam tracing are furthermore required for 5 product lines.	C	<p>Purging and cleaning of equipment is conducted with a low pressure 2.7 bar nitrogen, with a flexible nitrogen hose. The nitrogen is used to clean equipment (on a daily basis) such as pipelines and tanks that contain flammable products or gasses for tasks such as welding that has to be done on tanks or pipelines.</p> <p>The Auditor was informed that the steam tracing only occurs on two product lines.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> SOP for Cleaning of Equipment in LBS with Plant Utilities (SL-LBS-SOP-022) dated 07 October 2023 	None.	N/A	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			<ul style="list-style-type: none"> Verbal Confirmation 					
	Firewater required in case of emergency is available both at SASCON and Section 5100.	C	<p>The deluge system is a spray water system that is utilised in firefighting during an emergency. It consists of a dry system (that uses levers to release water) and wet system (the installed glass is broken by water pressure to release water). The deluge system is tested monthly.</p> <p>There are also fire hoses and extinguishers on site for manual firefighting.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual onsite observation Verbal confirmation 	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)
	As with existing procedure, the effluent resulting from flushing, draining and disposal of oil will be routed to the OSB-dam.	C	<p>The oil effluent or wastewater flow is routed to the Oil Separation Basin (OSB). The OSB has two units that act as a filtering system to separate the water from the wastewater which then is routed to an effluent dam to be treated. Only one OSB unit was commissioned during the audit period while there was no activity at the other unit.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Onsite Observation IWWMP (SO-env-1192) dated December 2023 	None.	N/A	N/A	N/A	N/A
	All stormwater and spills will end up in a 9m ³ sump. The sump will have an overflow	C	The Auditor was informed that the central drain is located	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)
	that will be connected to the storm water sewer and will always be CLOSED.		<p>underground and sloped as per the facility design to allow effluent to flow to the chemical sump which is a closed system to prevent any contamination.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Site design layout Verbal Confirmation 					
	Before emptying of sump into either slop tank or OSB-dam, the effluent will be measured.	C	<p>The underground chemical sump is vacuumed, and the effluent is disposed by a waste management company or pumped into the system for reworking. The effluent is tested before treated so it does not contaminate the water in the closed system. However, the sump has no measuring equipment to measure</p>	None.	N/A	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			<p>the volume of effluent routed to the OSB. Any rainwater in the sump is routed to Bioworks and the oily effluent is routed to OSB.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation IWWMP (SO-env-1192) dated December 2023 					
	Flexible hoses will be used for loading into road tankers at Section 5100 during construction. Effluent resulting from draining of these hoses - approximately 25 litre per tanker -will be drained into drums, which will be transported back to the drum platform at SASCON for later usage by Fire Department for training purposes. This procedure	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB was in the operational phase during the audit period.	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)
	needs to be incorporated into the operation procedure.							
	As per current procedure, effluent resulting from lines emptied at LOADING operations will be disposed into a slop tank for disposal and removal by a licenced waste removal company. The licenced waste removal company will dispose the effluent from the lines according to legal waste requirements at a licenced landfill.	C	<p>The oily effluent at the RLF is routed to the OSB unit where it is filtered, and the water is rerouted to the effluent dam, while the oil is collected by a waste management service provider for disposal. The chemical effluent is vacuumed and disposed by waste service provider at the Vlaktefontein Hazardous Waste Facility.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Onsite Observation IWWMP (SO-env-1192) dated December 2023 SOP for Cleaning of equipment in LBS with plant utilities (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)
			SL-LBS-SOP-022) dated 10 October 2023 <ul style="list-style-type: none"> Averda Waste Manifests and Safe Disposal Certificates Vlakfontein Safe Disposal Certificates 					
	The new OSB-dam will be constructed before the existing dam will be filled, to ensure that effluents currently received by the OSB dam are dealt with during the construction phase of the SASCON facility.	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB was in the operational phase during the audit period.	None.	N/A	N/A	N/A	N/A
	Potential pollutants will be stored as appropriate based on their hazard rating and the environmental consequences should a leak/accident occur.	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB was in the operational phase during the audit period.	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)
	Cement would be stored on an impermeable substratum.	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB was in the operational phase during the audit period.	None.	N/A	N/A	N/A	N/A
	Containers of grease and oil and paint would be stored on an impermeable substratum.	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB was in the operational phase during the audit period.	None.	N/A	N/A	N/A	N/A
	Any spills would be cleaned immediately, and the contaminated material disposed of in an appropriate manner.	C	Spill kits were readily available onsite for use during a spill incident. No spillage incidents were recorded for the OSB during the current audit period. However, the following minor spill	None.	N/A	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			<p>incidents were recorded for the RLF:</p> <ul style="list-style-type: none"> Approximately 1 litre of paraffin was spilled at the West Gate weighbridge from a tanker on the 12 October 2022 – the tanker was returned, and the spill was cleaned by emergency personnel. Wax released from a tanker at LOC offloading area on the 15 August 2023. Product (raffinate) leaked from an isotainer on the 11 August 2023. Approximately 860kg of paraffin (C9-C11 n-paraffin) was released from a bunded area into the plant chemical sewer due to an open 					

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>offloading valve on a tanker being loaded on the 24 October 2023. The threshold exceedance was reported to authority.</p> <ul style="list-style-type: none"> Butanol leaked from a rail tanker after loading operations and it was returned to the plant for offloading on the 26 November 2023. <p>The Auditor was informed that all the incident tasks were resolved and closed and that the spill kits were cleaned and that the contaminated material were disposed of in an appropriate manner, where applicable.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Incidents Register Verbal Confirmation 					

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"> Visual Site Observation 					
	As mentioned previously, a 9m ³ -chemical sump will catch the initial runoff. The effluent contained in the sump will be measured before disposal.	C	<p>The Auditor was informed that the central drain is located underground and sloped as per the facility design to allow effluent to flow to the chemical sump which is a closed system to prevent any contamination.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Site Design layout Verbal Confirmation 	None.	N/A	N/A	N/A	N/A
	Excess stormwater will be conveyed via the stormwater sewer to SCI's water containment system. SCI has sufficient capacity to contain stormwater from the site so that its quality can be analysed prior to release.	C	<p>It was confirmed during the site assessment that excess stormwater on site is routed to Bioworks for quality check and reuse.</p> <p><i>Evidence:</i></p>	None.	N/A	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			<ul style="list-style-type: none"> Visual Site Observation Verbal Confirmation SWMP (SO-env-1192) dated December 2023 					
Air Quality								
	Increased VOC concentrations due to the project is predicted to be negligible due to improved technology (mass flow meters, new pumps ext.) that will be used.	C	The Volatile Organic Compound (VOC) emissions at the rail loading facility are monitored for the lower and higher altitude emissions. The Occupational Health Risk Assessment, dated September 2023, assesses the lower level, and it is noted in the report that there was no new health risks associated with long-term occupational exposure to chemical,	None.	N/A	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			<p>physical, ergonomics and biological hazards.</p> <p>Periodic sampling of the higher altitude emissions is conducted annually in accordance with the site's Atmospheric Emission Licence (AEL).Based on the results reported, Sasol's Site Logistics plant is in full compliance with its emission requirements for the financial year, as stipulated 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 ■ FY23 Annual Emissions Report (FDDM-MET-2013-22-R1) dated 29 August 2023 					

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"> Baseline Health Risk Assessment (Ref: SEO-079-2023-CRS-HRA) dated 04 September 2023 					
	During the construction period, the tankers will be loaded from the top. SASCON will ensure that the existing operation procedure is used to train the operators.	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB was in the operational phase during the audit period.	None.	N/A	N/A	N/A	N/A
	During cleaning of the OSB-dam, workers might be exposed to vapours from the dam. This exposure can be limit by ensuring wearing of safety equipment.	C	<p>The Auditor was informed that the OSB dam was last cleaned in July 2022. The workers wore full PPE to prevent direct contact with the oil/sludge and vapours from the OSB dam.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation 	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)
	During operation, fugitive emissions are possible from valves. The existing ball valves will however be replaced, and mass flow meters installed - which will reduce exposure to fumes.	C	<p>The Auditor observed mass flow metres on the RLF equipment. Leak detection tests are conducted every 3 years based on the maintenance schedule and continuation of valve testing is conducted on monthly basis.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Leakers List Survey results by Enserve Environmental Services dated April 2024 Client Report by Enserve Environmental Services dated April 2024 Repair Orders by Enserve Environmental 	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)
			Services dated April 2024					
	During construction, products will be loaded at S5100 by bottom loading. This will result in odours which will be limited to the loading area	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB was in the operational phase during the audit period.	None.	N/A	N/A	N/A	N/A
	Increased product throughput will result in increased vapours & odours of the same products. The additional of the mass flow meters will however mitigate this impact.	C	The Auditor observed the mass flow meters at the RLF. The meters measure the product that is loaded into the tankers that is monitored in the control room to relay the data to the weighbridge system and the customers that receive the product dispatch. The meters are also utilised to ensure correct loaded volumes of the product.	None.	N/A	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			<p>The increased vapours are incinerated at the VCU which acts as a 'safety' system for the increased vapours released at the RLF.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation Visual Site Observation 					
	Limited organic odours will result from the new OSB-dam situated within the SCI Waste disposal area. Keeping the oil separator unit at its existing location (next to the SASCON facility) will mitigate this effect on the neighbouring community, as the dam constructed in the waste disposal area will only serve as retention dam.	C	The Auditor noted that there were no odours from the OSB dam during the site visit. However, the auditor was informed that the oil separation mainly occurs at the API and the separation equipment at OSB is redundant although most of the oil is filtered through the OSB system	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)
			located within the waste disposal area. <i>Evidence:</i> <ul style="list-style-type: none"> Verbal Confirmation Visual Site Observation 					
Soils								
	Excavations will be required for the new loading racks and for the new OSB-dam in SCI's waste disposal area. The excavated soil at SASCON will be used as backfill for foundations. Existing SASOL procedures will be followed.	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB was in the operational phase during the audit period.	None.	N/A	N/A	N/A	N/A
	Disposal of all waste materials would be at a recognised appropriate dumping site as per existing procedures.	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB was in the operational	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)
			phase during the audit period					
	The sludge from the existing OSB-dam will be removed during the cleaning of the dam before the dam will be filled. The existing procedure of disposal (through Waste-tech) will be followed.	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB was in the operational phase during the audit period.	None.	N/A	N/A	N/A	N/A
	The six existing racks and various product lines will be disposed. If redundant, it will be cut into pieces, and disposed of via a scrap metal dealer.	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB was in the operational phase during the audit period.	None.	N/A	N/A	N/A	N/A
	Pipes are freed of products by recovering as much as possible into the storage tanks. Pipes that are to be replaced will be cleaned with	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB	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)
	steam before being cut. Once removed the pipe would be inspected for contamination. If the pipe contains no obvious oils or contaminants, it would be moved to the area established for redundant materials. If the pipe is contaminated it would be stored on an impermeable sub-stratum for appropriate disposal.		was in the operational phase during the audit period.					
	As with existing procedure, the effluent resulting from flushing, draining and disposal of oil will be routed to the OSB-dam.	C	The oil effluent or wastewater flow is routed to the OSB. The OSB has two units that act as a filtering system to separate the water from the wastewater which then is routed to an effluent dam to be treated. Only one OSB unit was commissioned during the audit period while there was not activity at the other unit.	None.	N/A	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			<i>Evidence:</i> <ul style="list-style-type: none"> Visual Onsite Observation IWWMP (SO-env-1192) dated December 2023 					
	All stormwater and spills will end up in a 9m ³ sump. The sump will have an overflow that will be connected to the storm water sewer and will always be CLOSED.	C	<p>The Auditor was informed that the central drain is located underground and sloped as per the facility design to allow effluent to flow to the chemical sump which is a closed system to prevent any contamination.</p> <i>Evidence:</i> <ul style="list-style-type: none"> Site Design layout Verbal Confirmation 	None.	N/A	N/A	N/A	N/A
	Before emptying of sump into either slop tank or OSB-dam, the effluent will be measured.	C	The oily effluent at the RLF is routed to the OSB unit where it is filtered, and the water is rerouted to the effluent	None.	N/A	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			<p>dam, while the oil is collected by a waste management service provider for disposal. The effluent at OSB is sampled and measured before it is routed to the dam. The chemical effluent at the RLF is vacuumed and disposed by waste management service provider at the Vlaktefontein Hazardous Waste Landfill facility.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Onsite Observation IWWMP (SO-env-1192) dated December 2023 SOP for Cleaning of equipment in LBS with plant utilities (SL-LBS-SOP-022) dated 10 October 2023 					

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"> Averda Waste Manifests and Safe Disposal Certificates Vlakfontein Safe Disposal Certificates Test Report: Waste Classification for Disposal by UIS Organic Laboratory 					
	Flexible hoses will be used for loading into road tankers at Section 5100 during construction. Effluent resulting from draining of these hoses - approximately 25 litre per tanker - will be drained into drums, which will be transported back to the drum platform at SASCON for later usage by Fire Department for training purposes. This procedure needs to be incorporated into the operation procedure.	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB was in the operational phase during the audit period.	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)
	As per current procedure, effluent resulting from lines emptied at SASCON will be disposed into a slop tank for disposal to Waste-tech.	N/A	The Auditor was informed that lines are not flushed. The nitrogen is purged back to storage tanks. No disposal of oil occurs at the RLF therefore, this condition was not audited.	It is recommended that this condition is amended to reflect the current operations. <i>Timeframe:</i> <ul style="list-style-type: none"> Medium term: 6 to 12 months 	N/A	N/A	N/A	N/A
Socio-economic Environment								
	Improve conditions of employment as a result of project due to improved technology used and larger area available for trucks to manoeuvre.	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB was in the operational phase during the audit period.	None.	N/A	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
	The existing facilities would be able to accommodate the additional workforce employed during construction.	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB was in the operational phase during the audit period.	None.	N/A	N/A	N/A	N/A
	Sufficient availability of electricity supply for the construction and operational phases of the project has been confirmed by the product team.	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB was in the operational phase during the audit period.	None.	N/A	N/A	N/A	N/A
	Approximately 20 temporary job opportunities will be created during the construction period. Hereby experienced can be gained and skills be transferred.	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB was in the operational phase during the audit period.	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)
	Employees will be trained in new operating procedures.	C	<p>Sasol employees are trained in new operating procedures during induction as per the training matrix schedule.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Attendance registers for training on the EA (EOSEO-SA-3429) dated 30/04/2024; Training on loading road tanker with flammable liquid product (EOSEO-PR-4673) dated 26/03/2024 	None.	N/A	N/A	N/A	N/A
	The demand for construction materials and supplies will have an effect on the community. This impact can be optimised by sourcing and purchasing materials locally and regionally wherever possible.	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB was in the operational phase during the audit period.	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)
Dust								
	The potential for generation of dust during construction will be very limited and restricted to excavations at SASCON and at SCI's waste disposal area. Movement of trucks on untarred roads will be limited.	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB was in the operational phase during the audit period.	None.	N/A	N/A	N/A	N/A
	The procedure for customers collecting product from SASCON will stay unchanged.	C	<p>The auditor was informed that the collection of various products at RLF is done as per the current version of the SOP for <i>Loading a Road Tanker with Flammable Chemical Liquid Product</i>.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> SOP for Loading a road tanker with flammable chemical liquid product (SL- 	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)
			RRL-WI-002) dated 02 March 2021					
Land Value decrease								
	To mitigate this impact, the new OSB-dam will be constructed in SCI's waste disposal area, in a section of the channel which is used to convey the effluent from the existing OSB dam to the effluent dams.	N/A	Noted. This condition refers to a construction requirement and was therefore not audited. The RLF and the OSB was in the operational phase during the audit period.	None.	N/A	N/A	N/A	N/A
Health, safety risk								
	Pipelines would be cleaned internally to first remove combustible material before cutting takes place as per the procedure currently in place at SASOL for work on piping and equipment.	N/A	The Auditor was informed that this condition is out of scope, therefore it was not audited.	None.	N/A	N/A	N/A	N/A

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)
	Strict safety rules will apply for welding/grinding.	N/A	The Auditor was informed that this condition is out of scope, therefore it was not audited.	None.	N/A	N/A	N/A	N/A
	SASCON to ensure provision and proper utilisation, maintenance and disposal of toilet, wash and waste facilities.	N/A	The Auditor was informed that this condition is out of scope, therefore it was not audited.	None.	N/A	N/A	N/A	N/A
	Due to construction activities, certain areas may, for certain periods, be subjected to noise pollution. As a rule, hearing protection aids would be used in demarcated areas (occupational health and safety).	N/A	The Auditor was informed that this condition is out of scope, therefore it was not audited.	None.	N/A	N/A	N/A	N/A
	Accident precautions must be determined and put in place.	N/A	The Auditor was informed that this condition is out of	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)
			scope, therefore it was not audited.					
	Rubble would not be stored on or in close proximity to access routes of people or vehicles.	N/A	The Auditor was informed that this condition is out of scope, therefore it was not audited.	None.	N/A	N/A	N/A	N/A
	Sufficient safety equipment would be worn by employees while handling of sludge following from the OSB-dam cleaning;	C	<p>The Auditor was informed that the OSB dam was last cleaned in July 2022. The workers wore full PPE to prevent direct contact with the oil and vapours from the OSB dam.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation Safe Disposal Certificate for OSB sludge dated 15/08/2022 	None.	N/A	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
	Continued adherence to NOSA, ISO 14001 and all other guidelines and standards currently complying to.	N/A	The Auditor was informed that this condition is out of scope, therefore it was not audited.	None.	N/A	N/A	N/A	N/A
	Sufficient and suitable firewater tie-in points during construction have been confirmed.	N/A	The Auditor was informed that this condition is out of scope, therefore it was not audited.	None.	N/A	N/A	N/A	N/A
	All contractors would undergo safety training as per SASOL's existing procedure;	N/A	The Auditor was informed that this condition is out of scope, therefore it was not audited.	None.	N/A	N/A	N/A	N/A
	Each contracting company would have a safety representative who is to undertake regular inspections of the workplace, to enforce the wearing of protective clothing and to ensure	N/A	The Auditor was informed that this condition is out of scope, therefore it was not audited.	None.	N/A	N/A	N/A	N/A



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)
	compliance with all relevant safety rules.							
	All contractors and employees would make aware of existing emergency procedures and responsibilities.	N/A	The Auditor was informed that this condition is out of scope, therefore it was not audited.	None.	N/A	N/A	N/A	N/A

5 PROGRESS AGAINST PREVIOUS AUDIT FINDINGS

The previous EA and EMPr compliance audit report was compiled by the Northwest University CEM in 2019. A comparison in the change of compliance rating between the 2019 and 2024 audits are provided in **Figure 5-1** and Error! Reference source not found. below, and provides a summary of the audit findings for the previous and current audits (2019 and 2024). The 2019 audit identified zero non-compliant conditions.

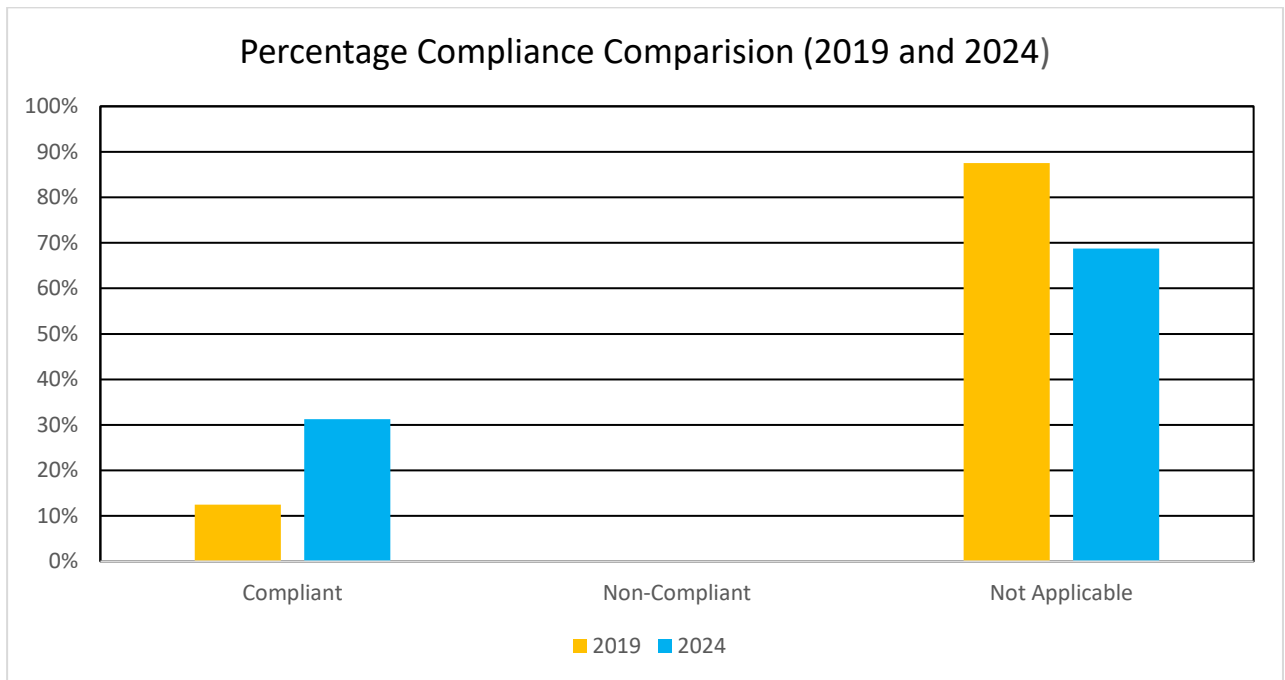


Figure 5-1 – Percentage comparison of Environmental Authorisation compliance levels from 2019 to 2022

6 SUMMARY OF THE AUDIT FINDINGS

6.1 SASOL SASOLBURG RLF AND OSB 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
Special Conditions	3	2	0	1
Standard Conditions	2	0	0	2
Key Factors in Decision	6	0	0	6
Duration and date of expiry	1	0	0	1
Appeal	1	0	0	1
Total	16	5	0	11
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.

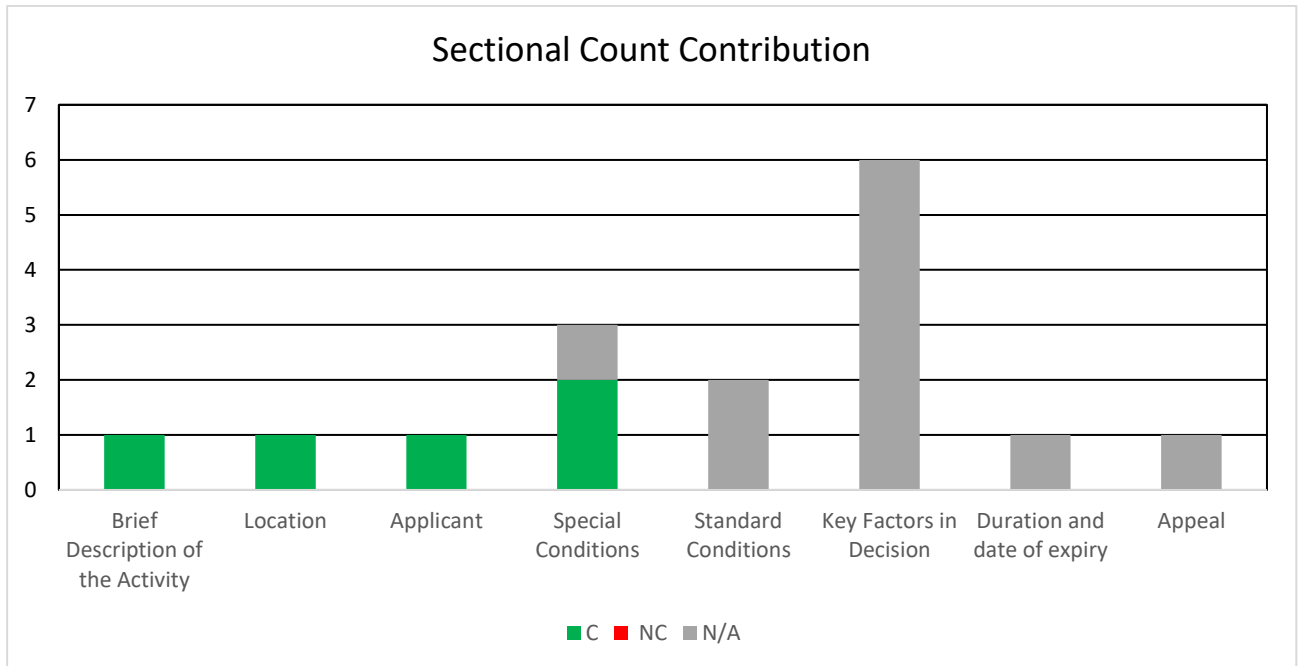


Figure 6-1 - Number/Count contribution of findings made to the EA conditions per section

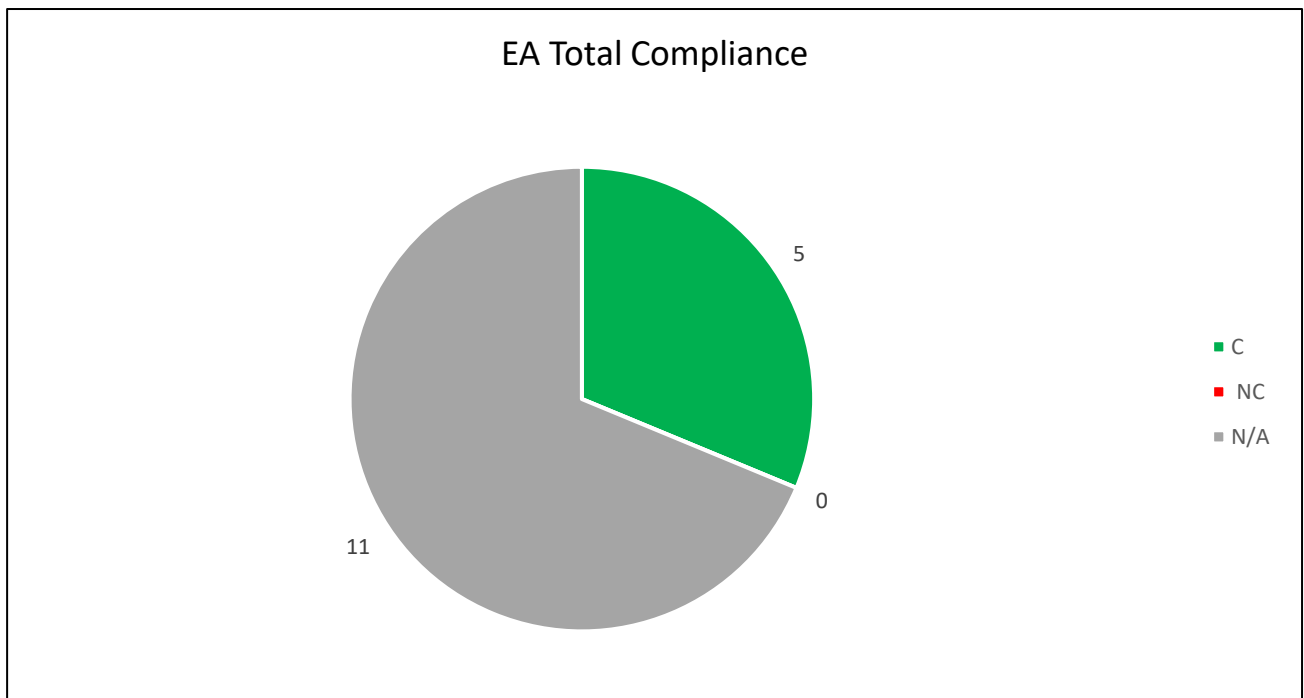


Figure 6-2 - Overall count findings on compliance to the EA commitments

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.

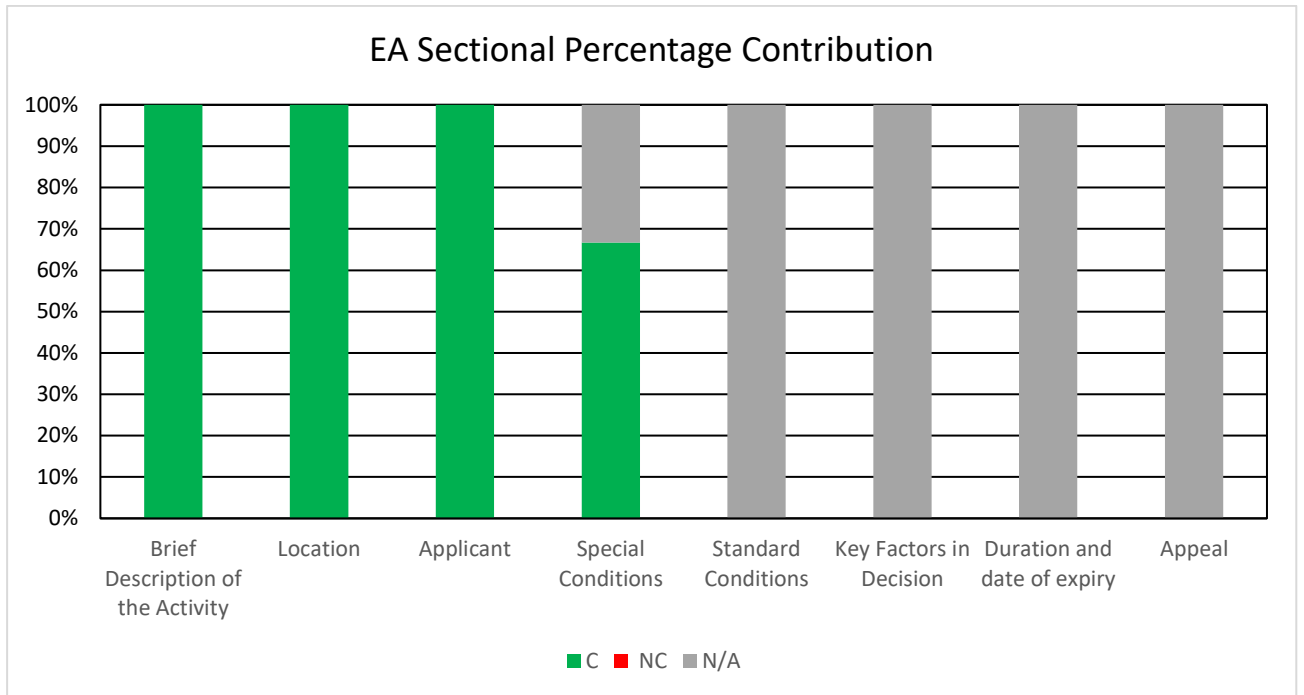


Figure 6-3 - Percentage contribution of findings made to the EA Commitments per Section

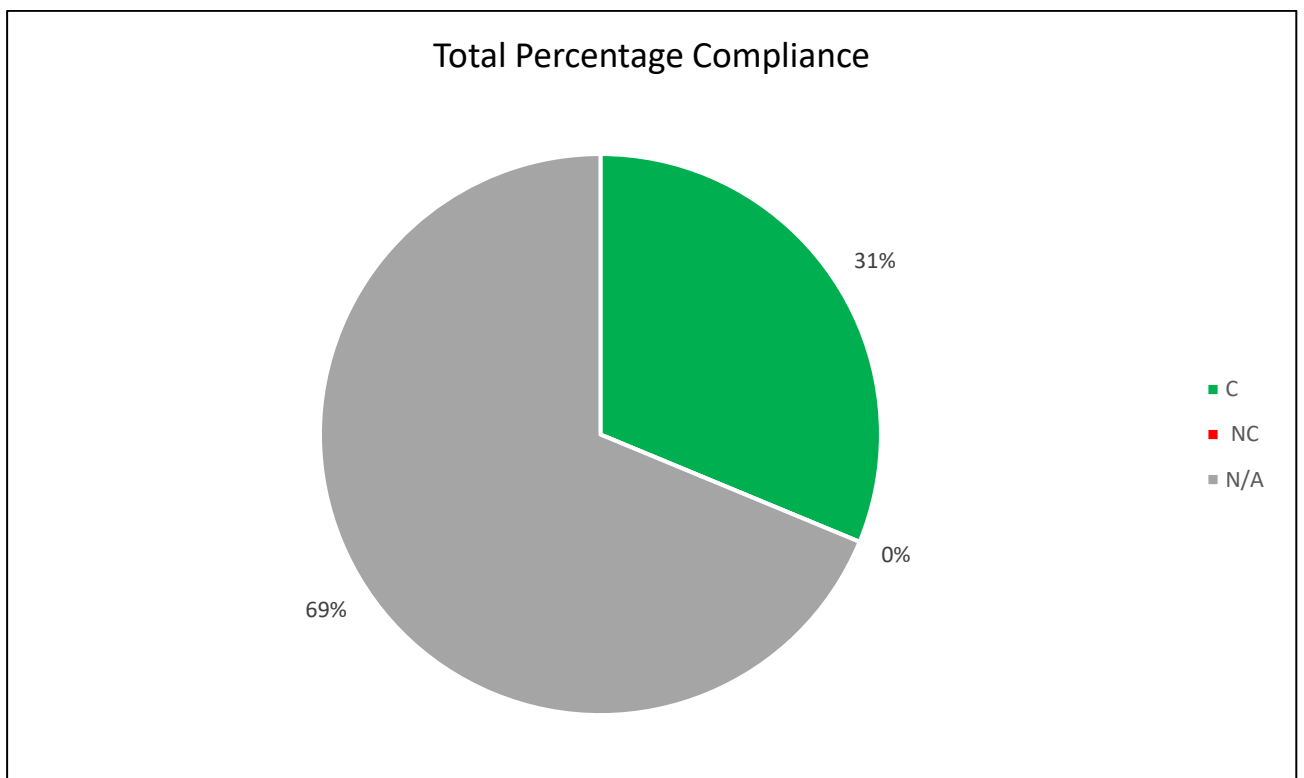


Figure 6-4 - Overall percentage findings on compliance to the EA Commitments

6.2 SASOL SASOLBURG RLF AND OSB EMPR COMPLIANCE

The audit findings have been summarised into the following categories: compliance, non-compliance and not applicable. The overall audit findings concerning compliance with 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
Groundwater	10	6	0	4
Surface Water	15	9	0	6
Air Quality	7	5	0	2
Soils	10	3	0	7
Socio-economic Environment	6	1	0	5
Dust	2	1	0	1
Land Value Decrease	1	0	0	1
Health, Safety Risk	12	1	0	11
Total	63	26	0	37
Total Percentage		41%	0%	59%
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.

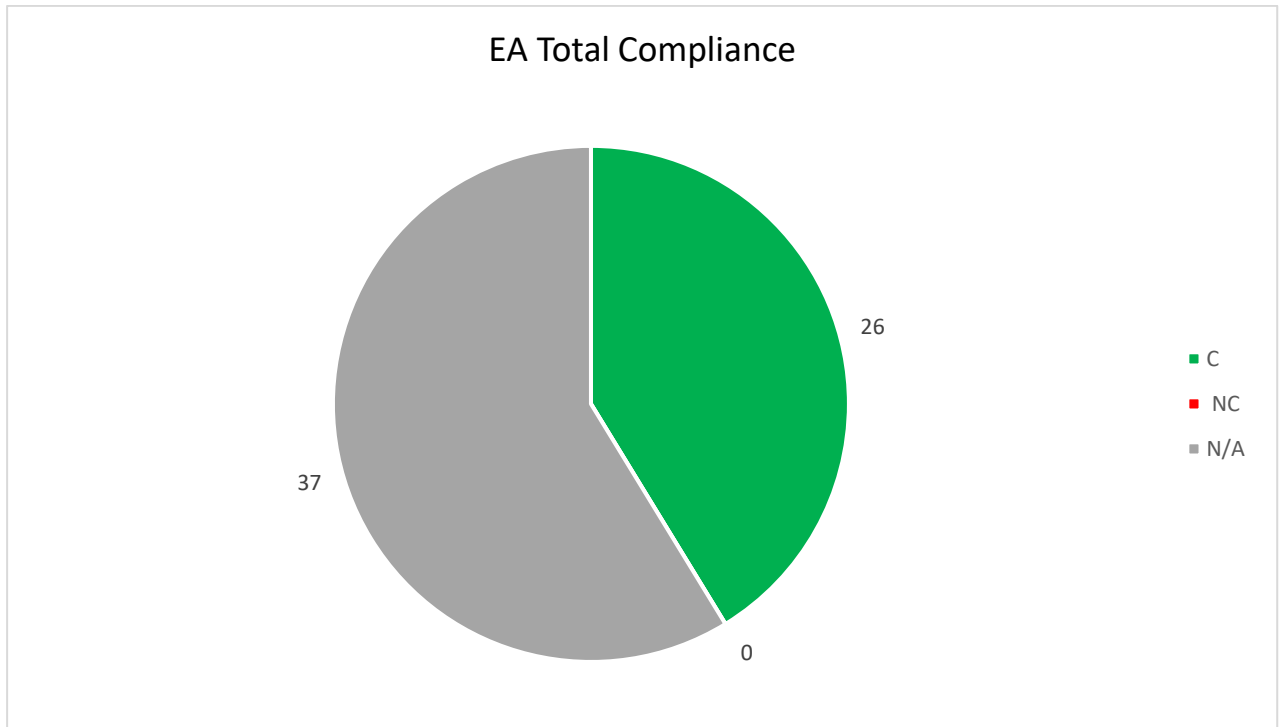


Figure 6-5 - Overall count findings on compliance to the EMPr Commitments

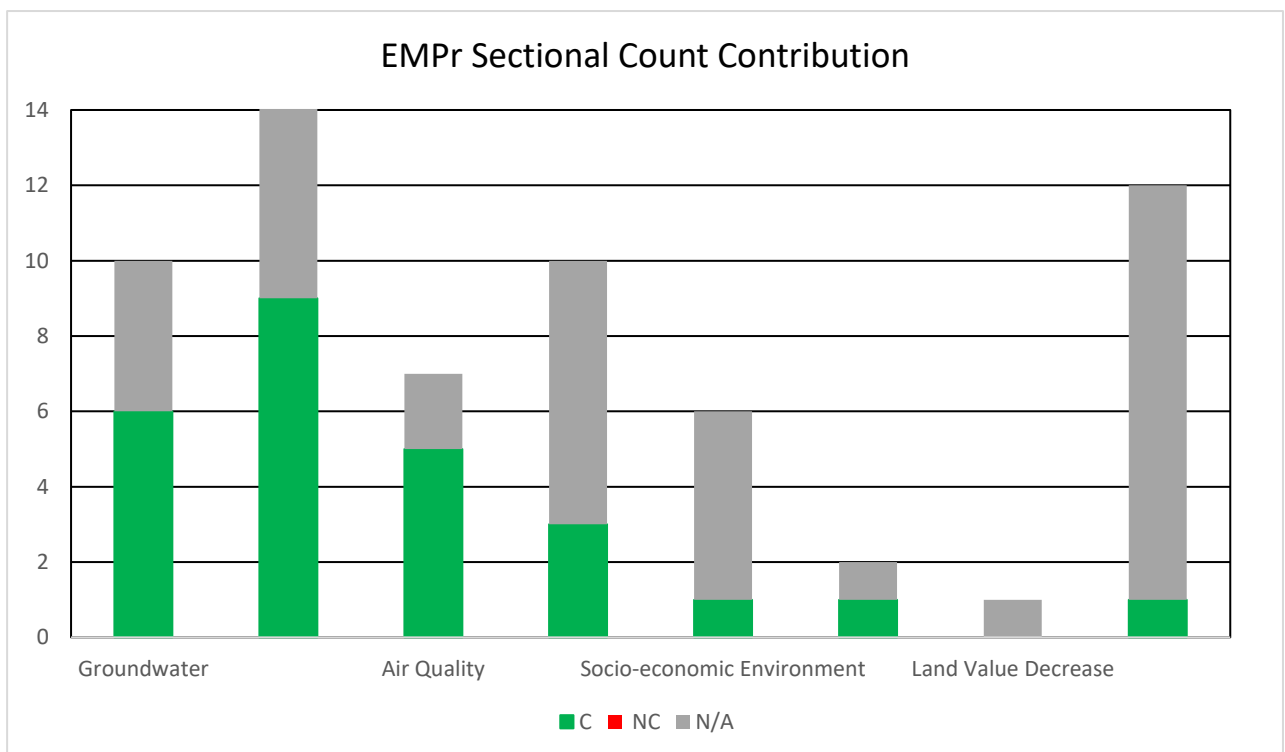


Figure 6-6 - Number/Count contribution of findings made to the EMPr Commitments per Section

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.

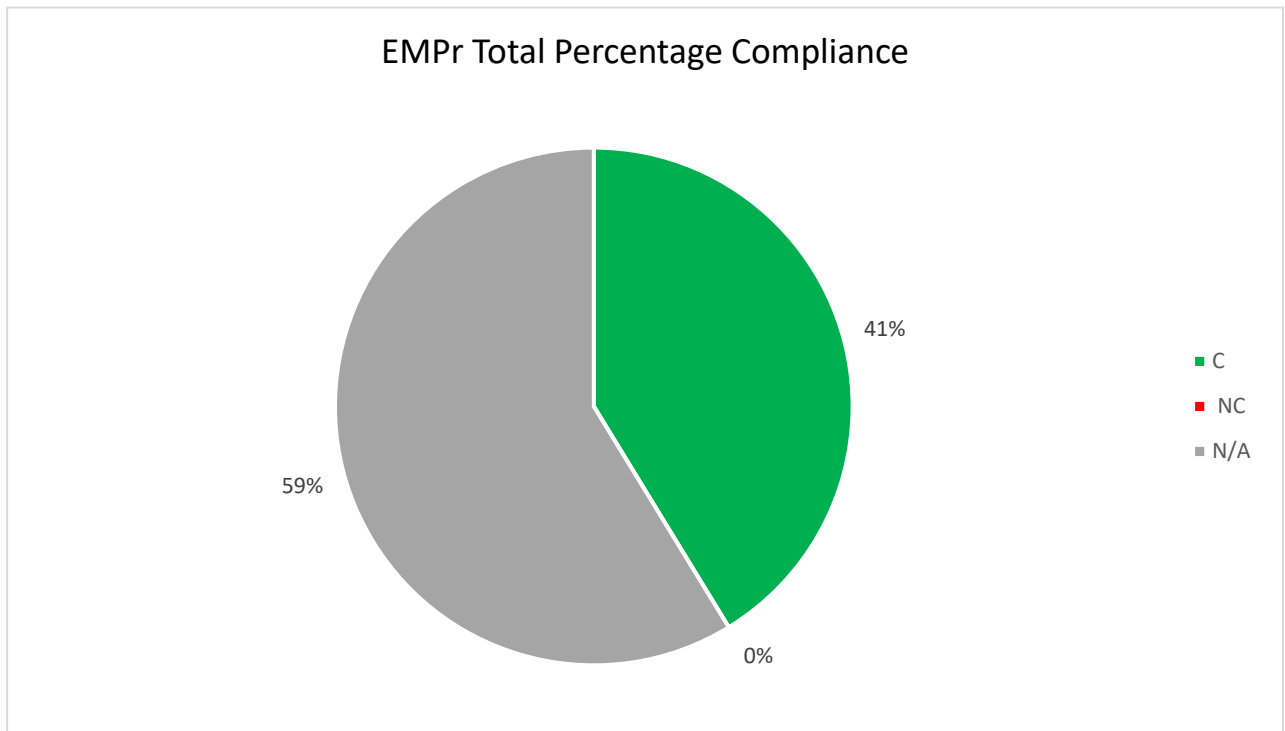


Figure 6-7 - Overall percentage findings on compliance to the EMPr Commitments

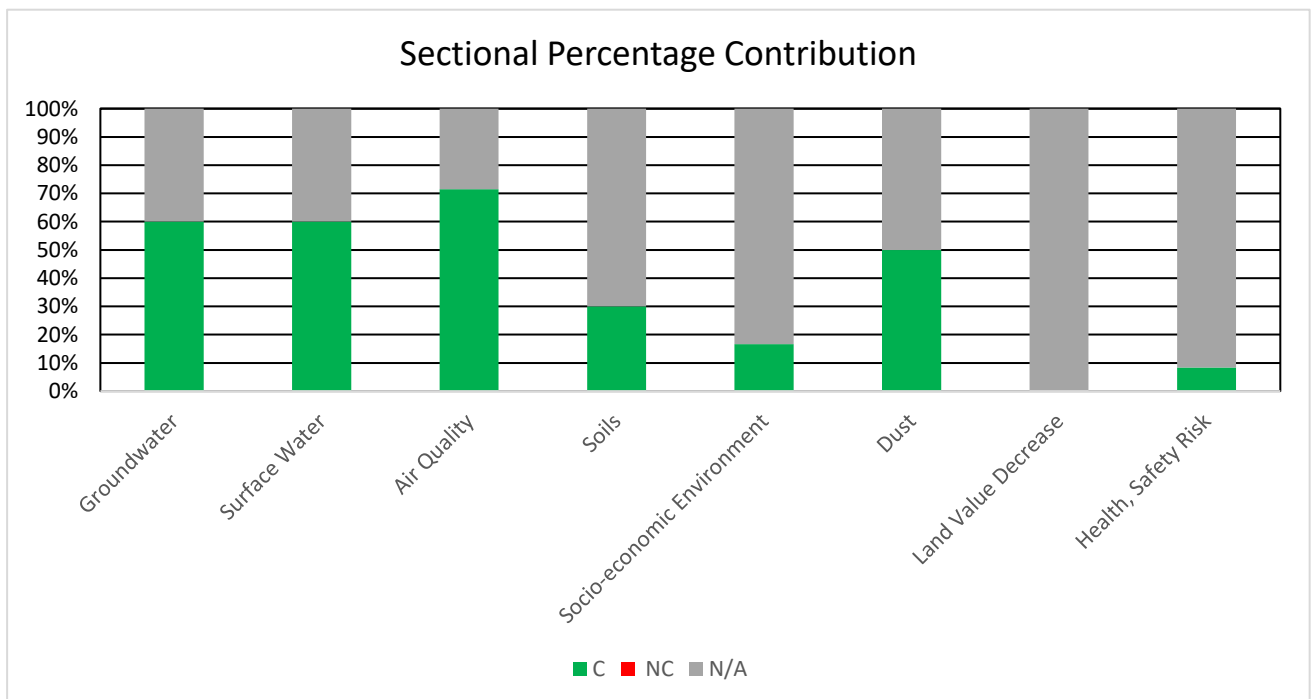


Figure 6-8 - Percentage contribution of findings made to the EMPr Commitments per Section

7 RECOMMENDATIONS

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.

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 Road Loading facility and OSB 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.



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 – Upgrading SASCON road facility, Construction of OSB– ref [EM1/1(c)00/30]

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 Outcome	Activity	Impact management action
1. Ground water Indirect risk of groundwater pollution from failure of the reticulation system or drains.	All activities involving increased water use including routing/disposal of process effluent routing of stormwater control of contaminated water routing of plant wash water routing of firewater disposal of water used for hydro-testing routing of process effluent handling of contaminated equipment measuring of product loading of products management and operation of equipment flushing draining and disposal of oil	1.1. Groundwater monitoring pits, which will be frequently monitored, will be dug at the new OSB dam to ensure that a leakage could be detected
		1.2. RSE business software is being used and not SAPR3 - no environmental impact
		1.3. The Road loading site is paved which will prevent groundwater contamination
		1.4. Firefighting equipment (additional to those already available on the trucks) will be made available at each tanker. Those tanks identified to having the highest risk in terms of a spillage will be managed by constructing a bund of soil around the coupling point.
		1.5. The new OSB-dam will be concreted to prevent groundwater contamination.
		1.6. The new area at road loading at the loading racks will be sloped to a central drain. A sloping line (underground) will connect this drain to a chemical sump. All stormwater, firewater and spills will end up in this sump. The sump will have an overflow that will be connected to the stormwater sewer and will always be CLOSED to prevent stormwater pollution
		1.7. The new OSB dam will be concreted to prevent groundwater and soil contamination
2. Surface water Containment of contaminated fire water Handling of increased effluent - potential for contamination of water resources Release of stormwater effluent to the OSB dam	All activities involving increased water use including potable water usage steam use in process wash water from cleaning equipment fire fighting shut down: safe making and plant washing routing/disposal of process effluent routing of stormwater control of contaminated water routing of plant wash water routing of firewater routing of process effluent handling of contaminated equipment measuring of product loading of products management and operation of equipment flushing draining and disposal of oil Stormwater management	2.1. Firewater required in case of emergency is available both at road loading facility
		2.2. The area at the new loading racks will be sloped to a chemical sump. Initial contaminated run-off could be collected and dispose of.
		2.3. Any water used on site to fight a fire will be contained within Sasol Operations' water management systems.
		2.4. The new loading racks will be equipped with an improved firefighting system
		2.5. As with existing procedure, the effluent resulting from flushing, draining and disposal of oil will be routed to the OSB-dam
		2.6. All stormwater and spills will end up in a slump. The sump will have an overflow that will be connected to the storm water sewer and will always be CLOSED.
		2.7. Before emptying of sump into either slop tank or OSB-dam, the effluent will be measured

		<p>2.8. As per current procedure, effluent resulting from lines emptied at road loading will be disposed into a slop tank for disposal to licenced waste removal company</p> <p>2.9. chemical sump will catch the initial runoff. The effluent contained in the sump will be measured before disposal.</p> <p>2.10. Excess stormwater will be conveyed via the stormwater sewer to Sasol Operations' water containment system. Sasol Operations has sufficient capacity to contain stormwater from the site so that its quality can be analysed prior to release.</p>
<p>3. Air</p> <p>Increase in VOC emissions</p> <p>Odours</p>	<p>Loading of products</p> <p>venting of purge gas</p> <p>fugitive emissions</p> <p>loading products</p> <p>treatment of Sasol Operations effluent at OSB dam</p>	<p>3.1. Increased VOC concentrations due to the project is predicted to be negligible due to improved technology (mass flow meters. new pumps ext. that will be used.</p> <p>3.2. During cleaning of the OSB-dam, workers might be exposed to vapours from the dam. This exposure can be limit by ensuring wearing of safety equipment.</p> <p>3.3. During operation, fugitive emissions are possible from valves. The existing ball valves will however be replaced, and mass flow meters installed which will reduce exposure to fumes.</p> <p>3.4. Increased product throughput will result in increased vapours & odours of the same products. The additional of the mass flow meters will however mitigate this impact.</p> <p>3.5. Limited organic odours will result from the new OSB-dam situated within the Sasol Operations Waste disposal area. Keeping the oil separator unit at its existing location (next to the road loading facility) will mitigate this effect on the neighbouring community, as the dam constructed in the waste disposal area will only serve as retention dam</p>
<p>4. Soils</p> <p>Pollution of soil and or water by oil hydrocarbons, chemicals and or other products used</p> <p>pollution of soil and or water by effluent from the site</p>	<p>Measuring of product</p> <p>disposal of packing material</p> <p>Loading of product</p> <p>flushing draining and disposal of oil</p> <p>routing of fire water</p> <p>routing of contaminated stormwater</p>	<p>4.1. Disposal of all waste materials would be at a recognised appropriate dumping site as per existing procedures</p> <p>4.2. As with existing procedure, the effluent resulting from flushing, draining and disposal of oil will be routed to the OSB-dam</p> <p>4.3. All stormwater and spills will end up in sump. The sump will have an overflow that will be connected to the storm water sewer and will always be CLOSED.</p> <p>4.4. Before emptying of sump into either slop tank or OSB-dam, the effluent will be measured</p> <p>4.5. As per current procedure, effluent resulting from lines emptied at road loading will be disposed into a slop tank for disposal to licenced waste removal company.</p>
<p>5. Emergency response plan</p> <p>Spill response plan</p>	<p>Incident management</p>	<p>5.1. Employees will be trained in new operating procedures</p> <p>5.2. Accident precautions must be determined and put in place</p>