



Our reference: SO-ENV-1327

29 November 2024

Your Ref: EA nr EM1/1 (c)/06/77

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Attention: Deputy Director: Environmental Impact Assessment

ENVIRONMENTAL AUTHORISATION EXTERNAL REPORT SUBMISSION

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

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

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

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

Attached, please find the compliance audit report for the MIBK2 project, Environmental Authorisation with reference EM1/1 (c)/06/77, dated October 2024.

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The Report indicates compliance at large with 96% compliance noted. The non-compliance relates to changes in operational procedure impacting the management action and not the impact objective included in the EMPr.

Summary of non-compliance

Condition	Finding	Recommendation	Response
Double mechanical seals will be used on pumps.	<p>The auditor was informed that double mechanical seals are not used on the pumps. Instead, canned pumps are used, as they have proven to be more efficient than double mechanical seals and are self-contained.</p> <p>Refer to commitment 27 below which allows for the use of canned pumps, where necessary.</p>	<p>It is recommended that Sasol amends this condition to reflect the equipment used.</p> <p>Timeframe: Medium term</p>	<p>As per regulation 36, change in operational condition was noted to the auditor prior to the Audit commencing. This constitutes a change in the impact management action. Different technologies is available to replace double mechanical seal pumps to prevent leaks. Sasol implements the best practical technologies. Self-containing pumps is used at the loading area where this condition is applicable</p>

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

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

Yours faithfully,

Signed by: Johann Van Wyk
Signed at: 2024-11-29 11:08:44 +02:00
Reason: I approve

Johann Van Wyk

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Annexure A

Audit report.

MIBK2 – ref EM1/1 (c)/06/77



Sasol South Africa Ltd

**METHYL ISO-BUTYL KETONE (MIBK 2)
ENVIRONMENTAL AUTHORISATION (REF. NO:
EM1/1 (C)/06/77) AND ENVIRONMENTAL
MANAGEMENT PROGRAMME AUDIT**

Compliance Audit Report: November 2019 - July
2024





Sasol South Africa Ltd

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DATE: OCTOBER 2024



Sasol South Africa Ltd

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Compliance Audit Report: November 2019 - July 2024

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QUALITY CONTROL

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Remarks	MiBK 2 Environmental Authorisation and Environmental management Programme Final Audit Report			
Date	October 2024			
Prepared by	Matilda Mbazo			
Signature				
Checked by	Anri Scheepers			
Signature				
Authorised by	Anri Scheepers			
Signature				
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AUDITOR CVS

1 INTRODUCTION

1.1 TERMS OF REFERENCE

WSP Group Africa (Pty) Ltd (WSP), as an independent environmental consultant, was appointed by 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)/06/77) for the construction of the Methyl Iso – Butyl Ketone (MiBK 2) and the associated Environmental Management Programme (EMPr), and to compile an audit report according to the requirements of the National Environmental Management Act (No. 107 of 1998), as amended (NEMA).

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

- EA for the construction of the MiBK 2 located at the Sasol One site (on the Sasol One site) in Sasolburg (reference number: EM1/1 (c)/06/77), dated 30 March 2007 and issued to Sasol Solvents, a division of Sasol South Africa Limited by the Department of Tourism, Environmental and Economic Affairs (DTEEA), now the Department of Economic, Small Business Development, Tourism and Environmental Affairs (DESTEA).
- The amendment of the construction of the MiBK 2 plant located at the Sasol One site in Sasolburg (reference number: E EM1/1 (c)/06/77)), dated 28 November 2017 and issued to Sasol South Africa Ltd by the DESTEA. The amendments include:
 - Location coordinates amendment.
 - Change the applicant details on the EA;
 - Owner of the EA
 - Contact details and address
 - Change of the holder of the EA.
 - Specific Condition (condition 2.3(e))
- The amendment of the construction of the MiBK 2 plant located at the Sasol One site in Sasolburg (reference number: E EM1/1 (c)/06/77)), dated 14 August 2020 and issued to Sasol South Africa Ltd by the DESTEA. The amendments include:
 - Change the applicant details on the EA;
 - Owner of the EA
 - Contact details and address
 - Specific Condition (condition 2.3 (a))
- EMPr included in the Scoping Report

1.2 SASOL SASOLBURG - METHYL ISO – BUTYL KETONE

Methyl Iso-Butyl Ketone (MIBK) is currently produced at the Sasolburg facility, which has an annual production capacity of approximately 25,000 tons. The MIBK 2 plant is set to increase this capacity

to 30,000 tons per year. MIBK is synthesized by reacting acetone and hydrogen in the presence of a suitable catalyst. Acetone is supplied via tankers from Secunda, while hydrogen is sourced from the ammonia plant in Sasolburg.

The plant utilises the same reactor technology as the existing facility, but the work-up section will transition from a five-column to a three-column design. Once operational, the total MIBK production at the site will reach 55,000 tons per year. The MIBK 2 plant is located adjacent to the existing Sasol Solvents plant at the Sasol One site, specifically in the Section 1200 tank farm.

MIBK is a water-white liquid with a sweet odour and is categorized as a ketone solvent, derived from acetone. It has a moderate evaporation rate and strong solvency properties, making it vital for various applications. The primary use of MIBK is as a solvent in industrial paints, where it dissolves solids to facilitate easy application as a liquid using brushes or spray techniques; approximately 55% of MIBK produced by Sasol Solvents is utilized in this capacity.

Additionally, MIBK is converted into other chemicals, including those used in rubber tires to prevent oxidation and extend tire lifespan, accounting for 23% of the MIBK produced. MIBK is also employed to extract valuable oils from plant seeds by dissolving the oil while leaving the solid residues behind, with recovery achieved through the evaporation of the MIBK.

1.3 PROJECT TEAM

WSP auditors, Yvette Mmanasoe and Matilda Mbazo, completed a site inspection of the MiBK 2 plant against the EA conditions (reference: EM1/1 (c)/06/77) at the Sasol One facility 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.

Audit Team	Role	Experience
Yvette Mmanasoe	Auditor	BSc Environmental Geography
		8 years' Experience
		Yvette has experience in environmental audits in different mining companies, compilation of ESIAs, application EAs, water use licenses, Section 24 G, Mining Rights and Prospecting Rights.

2 AUDIT SCOPE

WSP was appointed by Sasol to conduct the environmental compliance audit for the MiBK2 plant facility at the Sasol One site, Sasolburg. This report provides an overview of the level of compliance with the conditions contained in the EA, EA amendments and EMPr as indicated in **Section 1.1**.

The objective of the audit was to:

- Assess the level of compliance with the commitments of the EA and changes in the EA amendments for the MiBK2.
- Assess the level of compliance with the commitments of the EMPr that was submitted as part of the Scoping Report for the application for environmental authorisation for the MiBK2 plant facility, as agreed and approved by DESTEA;
- Assess the extent to which the avoidance, management and mitigation measures provided for in the EMPr for the operation of the MiBK2 plant was implemented.
- Identify and assess any new impacts and risks that result from undertaking the activity.
- Critically evaluate the effectiveness of the EA;
- Identify shortcomings in the EA and EMPr; and
- Identify the need for any changes to the avoidance, management and mitigation measures provided for in the EA and EMPr conditions.

The EIA Regulations are considered applicable to the MiBK2 plant. Regulation 34, of the EIA Regulations, provides for the auditing of an environmental authorisation, EMPr and closure plan. Furthermore, **Appendix 7** of Government Notice Regulation (GNR) 982 outlines the required audit report content. The 2014 Regulations, as amended, refer to a minimum audit frequency of five years. This audit is designed to meet the requirements of Regulation 34 of the EIA Regulations, 2014. **Table 2-1** indicates where the requirements of Section 34 and **Appendix 7** are met within this audit report.

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

Sub-Section	Requirement	Report Section Reference
34 (2)a	The environmental audit report must be prepared by an independent person with the relevant environmental auditing expertise.	Sub-section 1.3 and CV's provided in Appendix A
34(2)b	The environmental audit report must provide verifiable findings, in a structured and systematic manner, on:	Audit checklist tables provided in Section 4

Sub-Section	Requirement	Report Section Reference
	<p>(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</p> <p>(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;</p>	
3(a)	<p>The environmental audit report must determine</p> <p>(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</p>	Section 4
3(b)	The environmental audit report must determine the level of compliance with the provisions of environmental authorisation, EMPr and where applicable, the closure plan.	Section 4
4(a)	<p>Where the findings of the environmental audit report indicate:</p> <p>(a) insufficient mitigation of environmental impacts associated with the undertaking of the activity</p> <p>(b) insufficient levels of compliance with the environmental authorisation or EMPr</p> <p>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</p>	Section 4
a	<p>Details of-</p> <p>(i) the independent person who prepared the environmental audit report; and</p> <p>(ii) the expertise of independent person that compiled the environmental audit report.</p>	<p>Sub-section 1.3</p> <p>CVs provided in Appendix A</p>
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	<p>An indication of the ability of the EMPr, and where applicable, the closure plan to-</p> <p>(i) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis;</p> <p>(ii) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility; and</p>	Section 4

Sub-Section	Requirement	Report Section Reference
	(iii) ensure compliance with the provisions of environmental authorisation, EMPr, and where applicable, the closure plan.	
f	A description of any assumptions made, and any uncertainties or gaps in knowledge.	Sub-sections 0 and 2.2
g	A description of any consultation process that was undertaken during the course of carrying out the environmental audit report.	Sub-section 3.2
j	A summary and copies of any comments that were received during any consultation process.	Not Applicable
k	Any other information requested by the competent authority.	None requested

2.1 DISCLAIMER

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

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

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

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

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

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

2.2 ASSUMPTIONS AND LIMITATIONS

WSP noted the following assumptions and limitations during the audit:

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

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

3 AUDIT METHODOLOGY

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 and EMPr (e.g. records, permits, certificates, maintenance logs, monitoring results, previous audit reports, specialist reports (where available and applicable), etc.); and
- Compilation of an audit report.

3.1 AUDIT CHECKLIST

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

3.2 SITE INSPECTION AND INTERVIEWS

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

- Karlien Scholtz – Area Manager
- Suyen van Zyl – SHE Environmental Specialist

3.3 INFORMATION CONSIDERED

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

- Application for Amendment of an Environmental Authorisation (Ref no: E/04/02) dated 18 August 2019;

- Area Emergency Response Plan for Solvents (Revision 3) dated 01 December 2023;
- Integrated Water and Waste Management Plan (IWWMP) (Ref: SO-env-1192) dated December 2023:
 - Stormwater Management Plan (SWMP, 2023);
 - Rehabilitation Strategy and Implementation Plan (RSIP);
 - Water Conservation and Demand Management (WC/DM);
 - Water management;
 - Groundwater management;
 - Waste management;
 - Contaminated Water and Wastewater Management;
 - Effluent Management; and
 - Land management.
- Other related approvals documents;
- SAPEC Reporting system;
- Sasol Operations EA training Attendance Register, 17 May 2024;
- Scoping Report, Methyl Iso-Butyl Ketone MiBK 2, dated July 2006;
- The MiBK2 Audit report, Date: 29 November 2019, ref: SO-env-619;
- The reporting, investigation and recording of environmental incidents (Sasolburg Operations, 2023); and
- Waste Management and Disposal manifest.

3.4 ASSESSMENT EVALUATION METHODOLOGY

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

Table 3-1 Levels of Compliance

Compliance Level	Definition
Compliant (C)	<p>When an activity or commitment has been implemented, completed, is on-schedule or is maintained on an ongoing basis.</p> <p>Condition/mitigation measure/commitment has been achieved with evidence provided in the form of a document or site verification.</p>
Non-compliant (NC)	<p>When an activity or commitment has not been complied with in its entirety/certain aspects thereof have not been addressed.</p> <p>When a commitment has not been undertaken, not been completed according to plan, or where any unlawful actions have been identified. Non-compliant conditions are given target completion dates as follows:</p> <ul style="list-style-type: none"> — Short term: 0 – 6 months. — Medium term: 6 – 12 months.

Compliance Level	Definition
	— 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)/W77) dated 30 March 2007) ,Amendment (reference: EM1/1 (c) /06/77 dated 28 November 2017) and amended (Reference: EM1/1 (c) /06/77 dated 14 August 2020 Audit Findings.

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
Decision				
	In terms of Section 22 of the Environment Conservation Act, 1989 (Act No. 73 of 1989) the MEC: Tourism, Environmental and Economic Affairs hereby grants authorisation for the execution of the activity described above, subject to the conditions of approval contained in this Record of Decision.	N/A	Noted. The ROD was granted on 30 March 2007 and a few conditions were amended on 18 September 2019.	None.
Specific Conditions				
1.	This authorisation has been granted solely for the purposes of undertaking the specified activity referred to above.	C	<p>The EA was granted by DESTEA for the MIBK 2 plant on the 30 March 2007.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> EA (EM1/1 (c)/W77) dated 30 March 2007 	None.

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
2.	The following mitigation measures and recommendations contained in the scoping report (Final Scoping Report, Methyl Iso-Butyl Ketone MiBK 2, dated July 2006) compiled by Nemai Consulting must be adopted and complied with:	C	<p>The auditor reviewed the EMP which incorporates the mitigation measures and recommendations that are stipulated in the Scoping Report. All relevant conditions stipulated were compiled to in Table 4-2.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Amended EMP for the MIBK 2 Project Scoping Report, Methyl Iso-Butyl Ketone MiBK 2, dated July 2006 	None.
2.1.a	Environmental Management Plan: a. Construction contractors must comply with the measures contained in the Environmental Management Plan (Final Scoping Report Methyl Iso-Butyl Ketone MIBK 2, dated July 2000, Appendix J);	N/A	The MIBK 2 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None.
2.2 Construction Phase				
a.	Proper storage facilities should be provided for the storage of oils, grease, fuels, chemicals and hazardous materials;	N/A	The MIBK 2 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None.
b.	In the event of a fire or chemical spill it should be cleaned up immediately. Any contaminated soil should be removed and disposed of at an appropriate disposal site;	N/A	The MIBK 2 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None.
c.	All stormwaters should be routed to the cement stormwater system at Sasol;	N/A	The MIBK 2 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None.

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
d.	No waste may be burned on site;	N/A	The MIBK 2 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None.
e.	Waste should be restricted to storage in specifically designated areas and removed regularly.	N/A	The MIBK 2 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None.
2.3 Operational Phase				
a	All off-loading areas of acetone must be bunded and provided with a sump;	C	<p>The off-loading area is equipped with bunding to contain potential spills. Additionally, there is a sump on-site designed to capture any incidental acetone spills, ensuring effective management of spill risks.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 	None
b.	All other process, loading and storage areas must be bunded;	C	<p>The auditor observed that other process areas are bunded in case of a spillage event.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 	None
c.	It must be ensured that all polluted run-offs are collected and re-processed in the plant	C	<p>The auditor was informed that all off-spec catalyst is collected and re-processed in the plant. No physical waste is produced from the MIBK 2 plant.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation Scoping Report, Methyl Iso-Butyl Ketone MiBK 2, dated July 2006 	None

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
d.	Ensure that all surfaces are concreted with watertight joints to reduce the possibility of groundwater pollution,'	C	The auditor observed that all the surfaces are impermeable and bunded to reduce the possibility of groundwater pollution. <i>Evidence:</i> <ul style="list-style-type: none"> Visual Site Observation 	None
e.	Sasol Operations (the applicant) must maintain a transparent relationship with the public, and all relevant Information must be made available to the public on request	N/A	This condition is noted by the holder of the authorisation.	None
3 The following conditions from Department of Tourism, Environmental and Economic Affairs must be adhered to:				
3.1 Storm Water Management				
a.	Ponding of water on the site, due to poor drainage, must be prevented and where it does occur, it must be drained immediately.	C	The auditor did not observe any ponding of water on site. The MiBK 2 Plant is fitted with drainage systems to direct stormwater to the stormwater management site (Bioworks). <i>Evidence:</i> <ul style="list-style-type: none"> Visual Site Observation IWWMP (SO-env-1192) dated December 2023 	None
3.2	Ensure that all applicable Regulations as included in the Occupational Health and Safety Act (Act 85 of 1993), SABS codes and other statutory requirements are complied with.	N/A	Noted. While the regulations under the Occupational Health and Safety Act are being followed, including the provision of personal protective equipment (PPE) to employees, Sasol Operations conducts Health and Safety audits as per the statutory requirements.	Sasol is recommended to amend the EA to omit this condition as it pertains to safety measures and not environmental measures. <i>Timeframe:</i>

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
				<ul style="list-style-type: none"> Medium Term
3.3	<p>The holder of the authorisation must submit an environmental audit report to the Department, once after the construction phase of the facility (MiBK 2 Rant). The environmental audit report must -</p> <p>Contain the following:</p> <ul style="list-style-type: none"> Activity. Targets. Conformance/Non-conformance. Performance indicator Comments. 	N/A	The MIBK 2 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None.
3.4	In case of non-compliance with regulations the burden of proof rests with the applicant and/or the relevant contractor.	N/A	The MIBK 2 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None.
3.5	The Department hereby confirms that an audit of compliance with procedures mentioned can be conducted at any time. Records of monitoring and/or auditing must be made available for inspection to any relevant authority inspecting the development.	C	<p>Records of compliance/non-compliance with conditions of this authorisation are kept in good condition and were readily available and therefore should be readily available should the Department require such.</p> <p>No request was made by the Department during the current audit period for records or documents. In addition, the 2019 external EA and EMPr audit was provided with the records of compliance/non-compliance with conditions of this authorisation.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 	None

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<ul style="list-style-type: none"> Verbal Confirmation Sasol South Africa Ltd in Sasolburg, External Audits of EAs/RODs/EMPrs: W&S, MIBK 2 Project at Sasol One Site dated 11 November 2019 by Centre of Environmental Management 	
3.6	This Authorisation is granted in terms of Section 22 of the Environment Conservation Act, 1989 (Act No. 73 of 1989) and does not exempt the holder from compliance with other relevant legislation.	N/A	Noted. This audit scope did not cover a legal review of compliance of the MIBK 2 and the Sasol One Operations with all statutory requirements and whether they were in possession and compliance of all the necessary permits, authorisations or any other official documents	None
3.7	The holder of the authorisation must notify all registered interested and affected parties, within 7 (seven) calendar days of the Department's decision to authorise the activity.	N/A	The MIBK 2 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None
3.7 a.	An appeal to the minister or provincial authority under section 35(3) of the Act must be done in writing within 30 days from the date on which the record of decision was issued to the applicant in terms of regulation 10 (1);	N/A	The MIBK 2 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None
b.	An appeal must sit out all the facts as well as the grounds of appeal and must be accompanied by all relevant documents or copies of them, which are certified as true by a commissioner of oaths.	N/A	The MIBK 2 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None
3.7.2	Include the date on which the record of decision was issued to the applicant in terms of regulation 10(1) and the date by which appeals must reach the MEC.	N/A	The MIBK 2 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
3.8	This authorisation refers only to the project specified and described in the Record of Decision.	C	The EA was granted by DESTEA for the MIBK 2 plant on the 30 March 2007 and refers only to the MIBK 2 plant. <i>Evidence:</i> ▪ EA (EM1/1 (c)/W77) dated 30 March 2007	None.
a.	Changes in the proposal resulting in significant environmental Impacts are only permissible If approved in writing by the Department	N/A	The MIBK 2 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None
b.	The Department reserves the right to amend and review the conditions of authorisation every 5 years	N/A	This condition is noted by the holder of the authorisation.	None
3.9	The Department must be notified, within 30 days thereof, of any change of ownership and/or project developer. Conditions imposed in this Record of Decision must be made known to the new owner and/or developer and are binding on the new owner and/or developer.	N/A	Noted. The auditor was informed that there was not any change of ownership and/or project developer.	None
3.10	The Department must be notified of any change of address of the owner and/or developer.	N/A	Noted. The auditor was informed that the there is no change in the address of the owner and/or developer.	None
3.11	The conditions of the authorisation should be brought to the attention of all persons (employees, sub-consultants etc,) associated with the undertaking of this activity to bind such persons to these conditions.	C	Sasol, as the holder of the authorisation, acknowledges responsibility for ensuring compliance with the EA and provides environmental management awareness training to staff, service providers, contractors and visitors to ensure that everyone employed or acting on their behalf is aware that they need to comply with the EA and the EMPr conditions. Induction training is provided to all staff, service provides, contractors and visitors. <i>Evidence:</i>	None

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<ul style="list-style-type: none"> Verbal Confirmation Induction Materials Online Training Matrix Sasol Operations EA training attendance register, dated 17 May 2024 	
3.12	The owner and/or developer must notify the relevant authority, in writing, within 24 hours thereof if any condition of this authorisation is not adhered to.	C	<p>Sasol conducts internal and external performance audits according to Regulation 34 of the EIA Regulations, 2014 (as amended) for the operational phase of the MIBK 2. The last audit report was submitted to the Department on 29 November 2019.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation Sasol South Africa Ltd in Sasolburg, External Audits of EAs/RODs/EMPrs: W&S, MIBK 2 Project at Sasol One Site dated 11 November 2019 by Centre of Environmental Management 	None.
3.13	Records related to compliance/non-compliance with conditions of this authorisation must be kept in good order. Such records should be made available to this Department within seven (7) days from the date of written request from this Department.	C	<p>Records of compliance/non-compliance with conditions of this authorisation are kept in good condition and were readily available and therefore should be readily available should the Department require such. No request was made by the Department during the current audit period for records or documents.</p> <p>In addition, the 2019 external EA and EMPr audit was provided with the records of compliance/non-compliance with conditions of this authorisation.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation Verbal Confirmation 	None

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<ul style="list-style-type: none"> Sasol South Africa Ltd in Sasolburg, External Audits of EAs/RODs/EMPrs: W&S, MIBK 2 Project at Sasol One Site dated 11 November 2019 by Centre of Environmental Management 	
3.14	<p>Non-compliance with or any deviation from the conditions of this authorisation as set cut in the Record of Decision is regarded as an offence, and after reasonable provision has been given for remedial action, will be dealt with in terms of Section 29, 30 and 31A of the Environment Conservation Act (Act No. 73 of 1989) as well as any other appropriate legal mechanisms.</p>	N/A	Noted. No deviations from the stated conditions within the EA were noted during the current audit.	None
3.15	The applicant shall be responsible for all costs necessary to comply with the above conditions unless otherwise specified.	N/A	This condition is noted by the holder of this authorisation.	None
Duration and date of expiry				
I	This authorisation shall lapse if the activity does not commence within two years of the data of issue of this authorisation.	N/A	The MIBK 2 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None
Appeal				
	Section 35 of the Environment Conservation Act, 1988 (Act No. 73 of 1989), makes provision for appeal by any person who feels aggravated by a decision made by a relevant authority in terms of these regulations. 'Any person', therefore includes the applicant, interested party or member of the public.	N/A	The MIBK 2 plant is currently in operational phase. The condition is considered not applicable.	None



4.2 ENVIRONMENTAL MANAGEMENT PROGRAMME

Table 4-2 below provides the compliance of Sasol with the conditions within the EMP that were included in the Scoping Report for the MIBK2 at the Sasol Operations on the Sasol One site in Sasolburg.

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)
General								
1.	The relevant mitigation measures proposed for the construction phase should be carried forward to operations, where potential environmental impacts may still occur.	N/A	The MIBK 2 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None	None.	N/A	N/A	N/A
2.	Special conditions relating to operations, as stipulated in the RoD, need to be adhered to	C	All conditions outlined in the RoD are detailed in Table 4-1 . The current report assesses compliance with these conditions, and no non-compliance issues were identified during this audit period.	None	None.	N/A	N/A	N/A
3.	Appropriate maintenance functions must be performed by	C	The SAPEC system is utilised to schedule and monitor	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)
	Sasol Solvents, as required, Responsible parties must be competent in the necessary maintenance tasks.		essential maintenance activities, clearly designating the responsible individual for each task. <i>Evidence:</i> <ul style="list-style-type: none"> Visual Site Observation Verbal Confirmation 					
4.	Feedback must be provided to the PSC and project proponent on a frequent basis.	N/A	The MIBK 2 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None	N/A	N/A	N/A	N/A
5.	Formal training of workers and drivers in the hazards of acetone to be transported by road. This will make personnel aware of the associated hazards in transporting acetone on the road and actions to take in case of an accident.	C	The auditor was provided with records documenting the induction and training of workers. Specific training such as handling of spillage, and handling of dangerous goods is recorded on the online matrix system. <i>Evidence:</i> <ul style="list-style-type: none"> Verbal Confirmation Induction Materials Online Training Matrix Sasol Operations EA training attendance register, dated 17 May 2024 	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)
6.	Making drivers and co- drivers aware of road hazards	N/A	The MIBK 2 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None.	None.	N/A	N/A	N/A
7.	Drivers should be educated to be more careful when approaching a hotspot	N/A	The MIBK 2 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None.	None.	N/A	N/A	N/A
8.	Ensure drivers driving at night or day are sober before undertaking the trip and have had enough rest.	N/A	The MIBK 2 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None.	None.	N/A	N/A	N/A
9.	Ensure drivers are familiar with the specific route deviation of a route may result in a higher risk	N/A	The MIBK 2 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None.	None.	N/A	N/A	N/A
10.	Ensure maintenance and inspections on the outgoing vehicles are performed during the day and the supervisor confirms the condition of the road tanker before leaving site.	N/A	The MIBK 2 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None.	None.	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
11.	Personnel should be trained on a regular base to ensure that they stick to the prescribed loading procedures to prevent overfilling of a road tanker. This will limit the probability for an unstable load, which may result in a turnover of the road tanker at a steep crinkle road or when the road is in a bad condition.	C	<p>Sasol, as the holder of the authorisation, acknowledges responsibility for ensuring compliance with the EA and provides environmental management awareness training to staff, service providers, contractors and visitors to ensure that everyone employed or acting on their behalf is aware that they need to comply with the EA and the EMPr conditions. Induction training is provided to all staff, service providers, contractors and visitors.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation Induction Materials Online Training Matrix Sasol Operations EA training attendance register, dated 17 May 2024 	None	N/A	N/A	N/A	N/A
12.	The supervisor should confirm the Load of the tanker before departure. This will prevent the possibility of overfilling of the vehicle, which may result in an unstable load during	C	The tanker's load is monitored from the digital control room, which is equipped with an instrument that detects the tanker's capacity to prevent overfilling.	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)
	transportation		<i>Evidence:</i> <ul style="list-style-type: none"> Verbal Confirmation Visual Site Observation 					
13.	Ensure the driver is licensed to drive road tankers on public roads.	C	<p>The auditor was informed that Sasol conducts thorough screenings of all their drivers to ensure they are authorised to operate vehicles carrying dangerous goods on public roads.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation 	None	N/A	N/A	N/A	N/A
14.	A proper and adequate emergency response plan needs to be developed, maintained and practiced.	C	<p>Sasol Solvents has a comprehensive emergency response plan that includes the MIBK 2 plant under the 'Area Emergency Response Plan for Solvents.'</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Area Emergency Response Plan for Solvents (Revision 3) dated 01 December 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)
15.	Emergency Management should be contacted to assist in developing this emergency plan for all possible releases, which may occur.	N/A	The MIBK 2 plant is currently in operational phase with an existing emergency plan. Therefore, the condition is considered not applicable.	None.	None.	N/A	N/A	N/A
16.	Local authorities should also be contacted to confirm their capacity in terms of Emergency Services to assist in case of an accident.	N/A	Noted. The auditor was informed that there has not been a major accident that required contacting the local authorities.	None	N/A	N/A	N/A	N/A
17.	Educate the different local authorities in the hazards of product, which will be transported by road and confirm actions to take in case of a spillage on the road.	C	<p>The auditor was informed that Sasol funds a road show, which educates local authorities on emergency response procedures for various chemicals transported.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation 	None	N/A	N/A	N/A	N/A
18.	Personnel handling products at the discharge areas should be trained how to handle and how to operate the supporting equipment and emergency equipment.	C	<p>The auditor was provided with records documenting the induction and training of workers. All types of training are recorded on the online matric system.</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"> Verbal Confirmation Induction Materials Online Training Matrix Sasol Operations EA training attendance register, dated 17 May 2024 					
19.	Restrict access to dangerous or contaminated areas until the cleanup actions have been completed in case of a spillage on the road or loading, and off-loading area.	N/A	Noted. The auditor did not observe any spillage on site; therefore this condition is not applicable.	None	N/A	N/A	N/A	N/A
20.	Ensure trained personnel or trained contractors conduct clean-up activities only.	N/A	The MIBK 2 plant is currently in operational phase. Therefore, the condition is considered not applicable.	None.	None.	N/A	N/A	N/A
21.	Wear adequate personal protective clothing and equipment where necessary	C	<p>All personnel on the MIBK 2 site were observed to wear adequate PPE.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 	None	N/A	N/A	N/A	N/A
22.	In case of an emergency on the site, contact the emergency service, who will contact the	C	Sasol always has an employee from the Environmental Department on standby in	None	N/A	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
	<p>Environmental standby. In the case of an emergency outside the Sasol boundaries, any Sasol employee or service provider should contact the Sasol call centre .The Southern African Emergency Call Centre serves as the 24/7 notification facility.</p> <p>The Call Centre fulfils a coordination role and will ensure that the correct notification process is adhered to, the appropriate business unit ER protocol is followed and that an effective response from the applicable response centre (typically Local Authority) is activated.</p> <p>(Also see - Sasol Regional Procedure for Emergency Response to Offsite Product Transportation Incidents)</p>		<p>case of an emergency within the facility or surrounding communities. Additionally, Sasol provides a toll-free number for reporting incidents, which is available 24 hours a day.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation Area Emergency Response Plan for Solvents (Revision 3) dated 01 December 2023 					
23.	Process, loading and storage areas should be bunded	C	<p>The auditor observed that other process areas are bunded in case of a spillage event.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 	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)
24.	A roof will be placed over parts of the storage areas at the MiBK2-plant to limit the amount of rainwater within the plant. Each storage tank at the tank farm has a fixed roof that cover the tank.	C	<p>The auditor observed that roofs have been installed over sections of the MIBK 2 plant to prevent rainwater ingress.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation 	None	N/A	N/A	N/A	N/A
25.	Double mechanical seals will be used on pumps.	NC	<p>The auditor was informed that double mechanical seals are not used on the pumps. Instead, canned pumps are used, as they have proven to be more efficient than double mechanical seals and are self-contained.</p> <p>Refer to commitment 27 below which allows for the use of canned pumps, where necessary.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation Visual Site Observation 	<p>It is recommended that Sasol amends this condition to reflect the equipment used.</p> <p><i>Timeframe:</i></p> <ul style="list-style-type: none"> Medium term 	N/A	This condition is not practical to the MIBK 2 plant.	This compliance will not have an impact; however it does not reflect what is currently used at the MIBK 2 facility.	N/A
26.	Nitrogen blanketing will be used in storage tanks and not in road tankers	C	The auditor observed that the nitrogen blanket in the digital control room is regularly	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)
			checked and maintained in the storage tanks. <i>Evidence:</i> <ul style="list-style-type: none"> Visual Site Observation 					
27.	Single seal centrifugal pumps are used for offloading acetone. Canned pumps are installed and there are only 2 mechanical seal pumps in area	C	It was confirmed during the site audit that canned pumps are installed and utilised at the MIBK 2 plant. <i>Evidence:</i> <ul style="list-style-type: none"> Verbal Confirmation Visual Site Observation 	None	N/A	N/A	N/A	N/A
28.	All spillages of chemicals will be sent to chemical sewers and storm water system	C	The auditor was informed that all spillages of chemicals will report to chemical sewers and storm water system (Bioworks). <i>Evidence:</i> <ul style="list-style-type: none"> Verbal Confirmation 	None	N/A	N/A	N/A	N/A
29.	All personnel must be familiar with safety and firefighting equipment.	C	The auditor was provided with records documenting the induction and training of workers. This includes training on the use of safety and firefighting equipment. All	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>training are recorded on the online matrix system.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation Induction Materials Online Training Matrix Sasol Operations EA training attendance register, dated 17 May 2024 					
30.	Safety induction must be expanded to include environmental risks and mitigation measures	C	<p>All inductions, including those for visitors, cover environmental risks and the associated mitigation measures.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visitors Induction Verbal Confirmation 	None	N/A	N/A	N/A	N/A
31.	Fire hydrants and monitors will be installed where applicable	C	<p>The auditor observed fire hydrants and monitors around the MIBK 2 facility.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 	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)
32.	Contaminated areas to be properly rehabilitated	N/A	Noted. No contaminated areas were observed during the site audit.	None	N/A	N/A	N/A	N/A
33.	All run-off will be routed to storm water systems.	C	<p>All run-off on the Sasol One site is routed through the stormwater systems to Bioworks for treatment and reuse.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> IWWMP (SO-env-1192) dated December 2023 	None	N/A	N/A	N/A	N/A
34.	Process area will be an impermeable surface within a bunded area	C	<p>The auditor observed that other process areas are bunded in case of a spillage event.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 	None	N/A	N/A	N/A	N/A
35.	All effluent (including rainwater) will be collected in a sump	C	<p>The auditor observed a sump designed to collect all effluent and stormwater at the MIBK 2 plant facility.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 	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)
36.	During operation of the plant, it must be ensured that all the polluted run-off will be collected and re processed in the plant Ensure that all surfaces are concreted with watertight joints to reduce the possibility of groundwater pollution.	C	<p>The tanker's load is monitored from the digital control room, which features an instrument that detects the tanker's capacity to prevent overfilling and potential runoff pollution. Additionally, the plant is situated on a concrete surface to prevent any seepage.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 	None	N/A	N/A	N/A	N/A

5 PROGRESS AGAINST PREVIOUS AUDIT FINDINGS

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

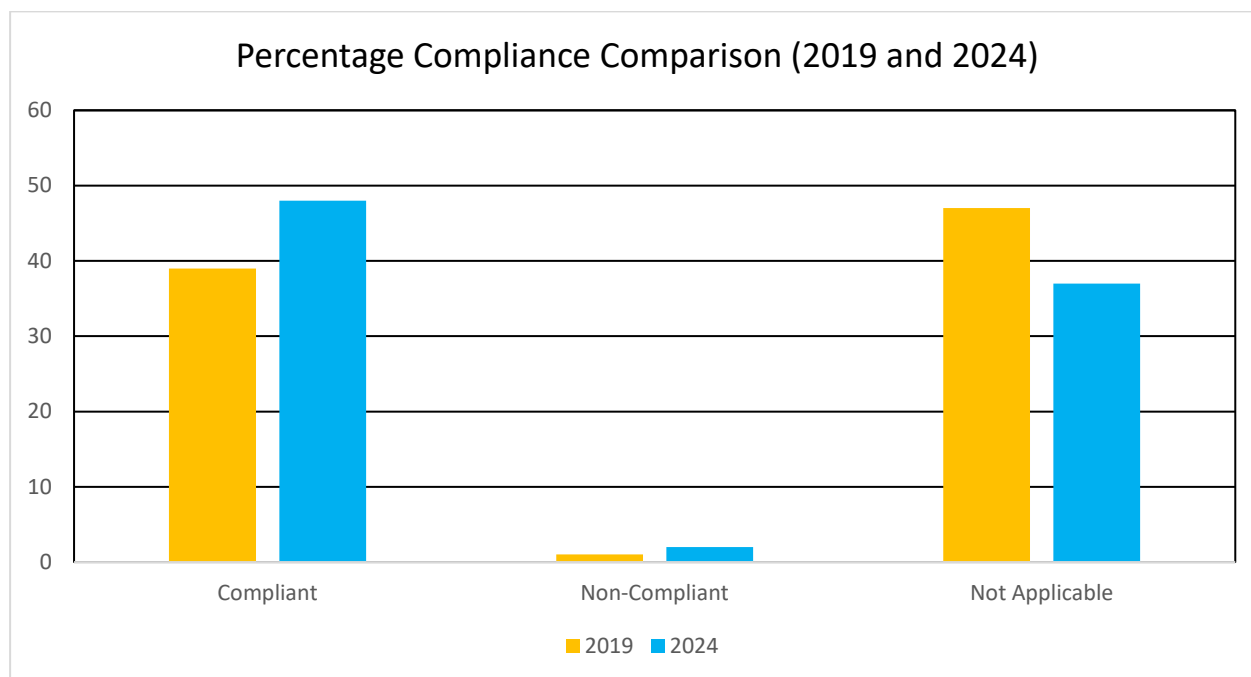


Figure 5-1 – Percentage comparison of Environmental Authorisation compliance levels from 2019 to 2024

Table 5-1 – Progress against previous findings

Ref	Commitment	2019 Status	2019 Finding	2024 Status	2024 Finding
EMPr Conditions					
General					
25.	Double mechanical seals will be used on pumps.	C	Canned pumps have been installed, which are purported to be a better technology than "double mechanical seals". See condition 27 below which allows for the use of canned pumps where necessary.	NC	The auditor was informed that double mechanical seals are not used on the pumps. Instead, can pumps are employed, as they have proven to be more efficient than double mechanical seals and are self-contained

6 SUMMARY OF THE AUDIT FINDINGS

6.1 SASOL SASOLBURG MIBK 2 EA COMPLIANCE

The audit findings have been summarised into the following categories: compliance, non-compliance and not applicable. The overall audit findings concerning compliance to the EA conditions are listed in **Table 6.1** below.

Table 6-1 - Summary of EA Compliance Audit Findings

Section of the EA	No. Commitments	C	NC	N/A
Decision	1	0	0	1
Specific Conditions	3	2	0	1
Construction Phase	5	0	0	5
Operational Phase	5	4	0	1
Stormwater Management	20	6	0	14
Duration and date of expiry	1	0	0	1
Appeal	1	0	0	1
Total	36	12	0	24
Total Percentage		33%	0%	67%
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.

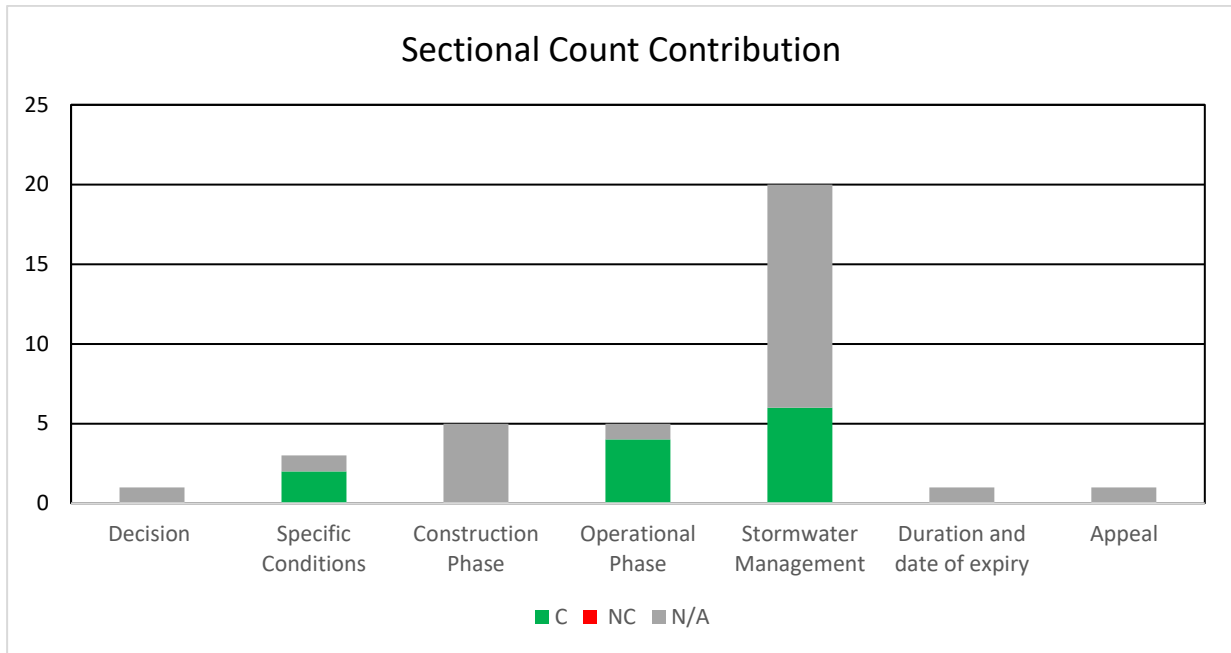


Figure 6-1 - Number/Count contribution of findings made to the EA conditions per section

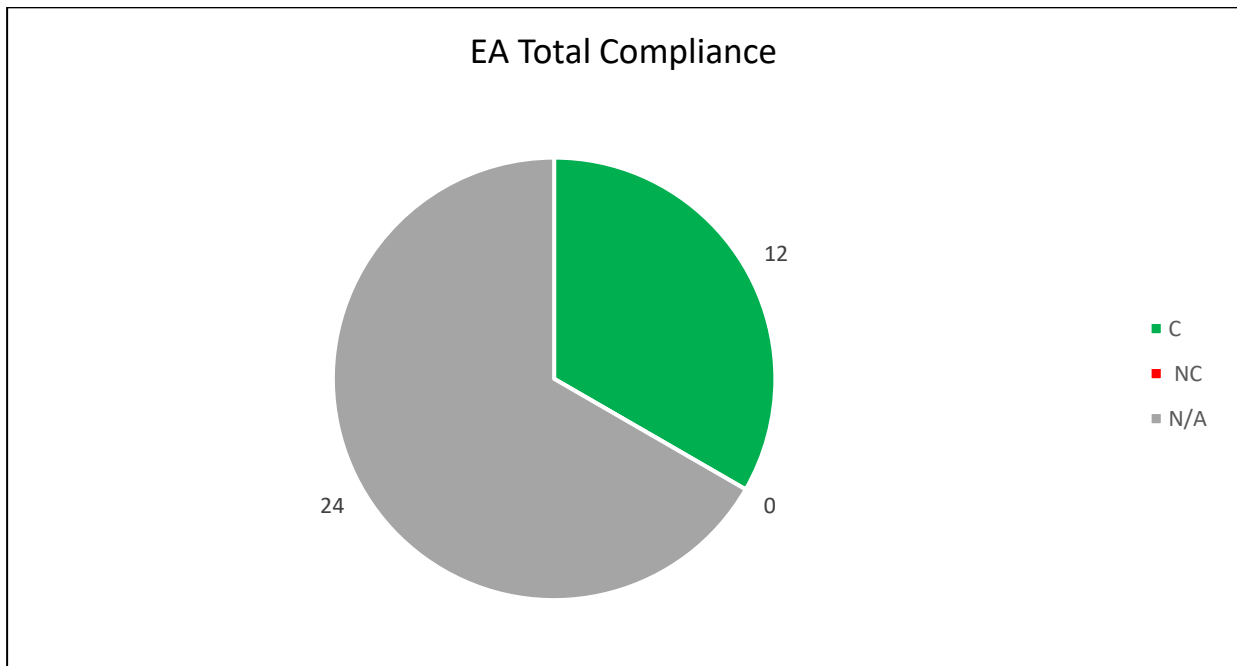


Figure 6-2 - Overall count findings on compliance to the EA commitments

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.

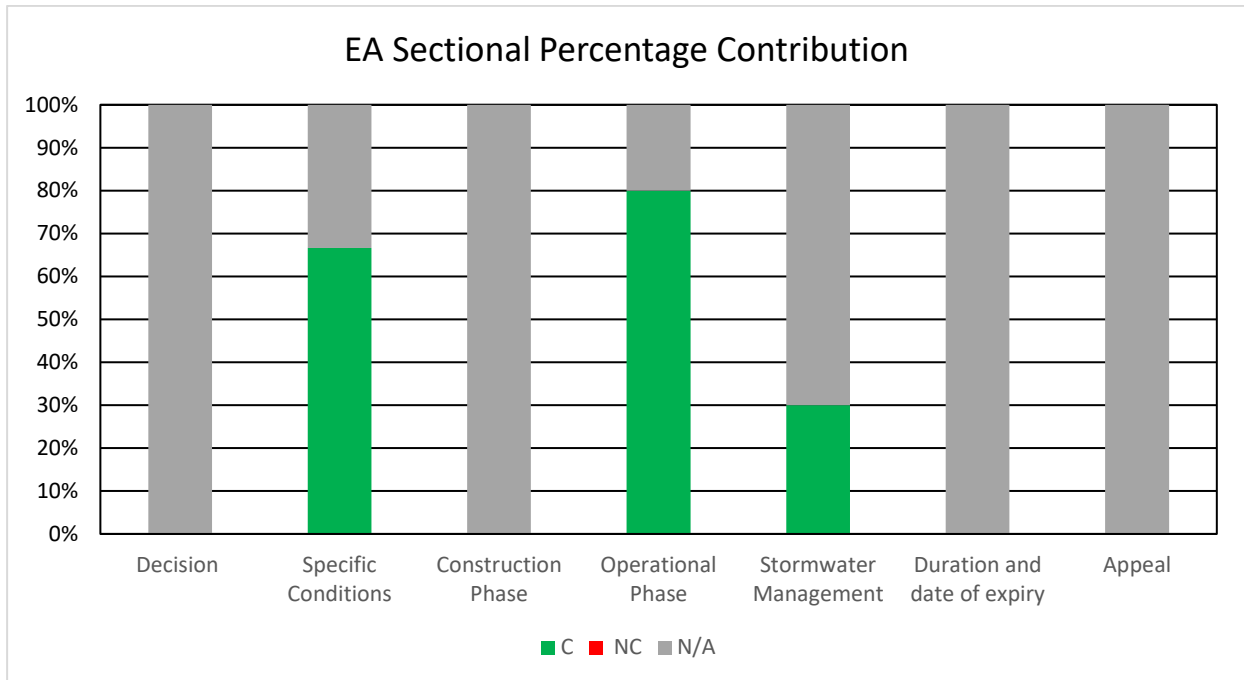


Figure 6-3 - Percentage contribution of findings made to the EA Commitments per Section

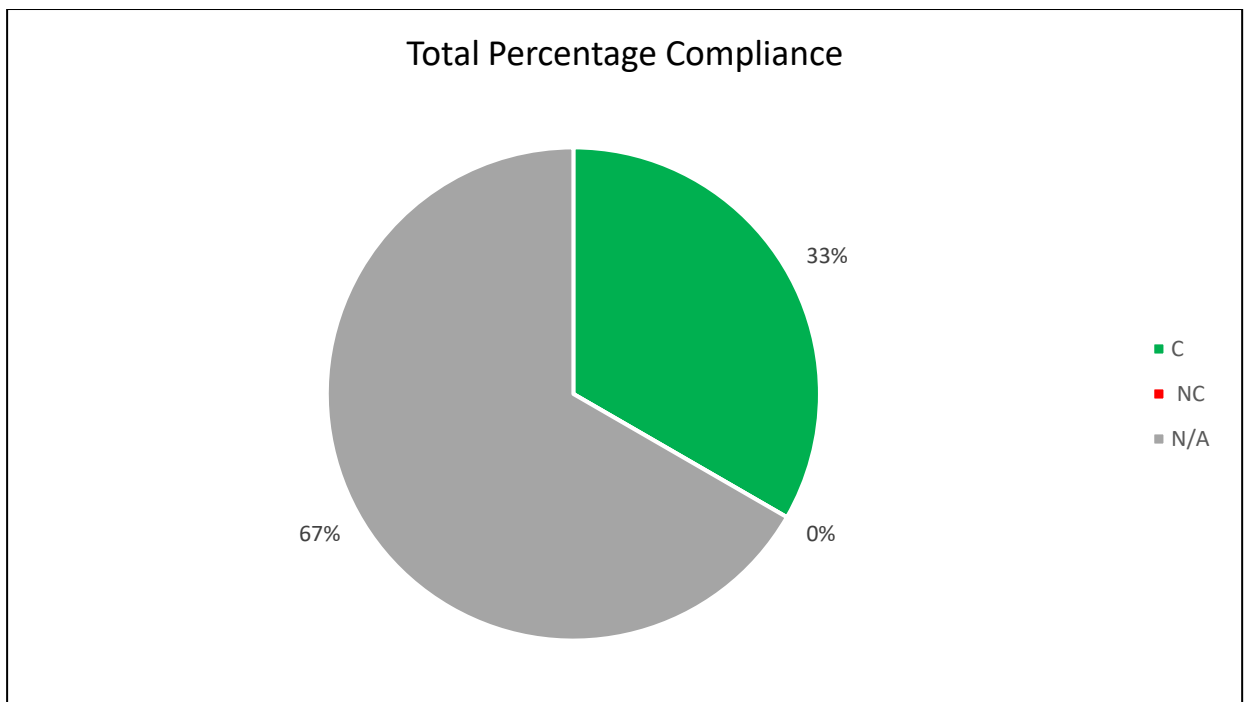


Figure 6-4 - Overall percentage findings on compliance to the EA Commitments

6.2 SASOL SASOLBURG MIBK 2 EMPR COMPLIANCE

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

Table 6-2 - Summary of EMPr Compliance Audit Findings

Section of the EMPr	No. Commitments	C	NC	N/A
General	36	23	1	12
Total	36	23	1	12
Total Percentage		64%	3%	33%
Percentage Compliance with Applicable Conditions	96%			

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.

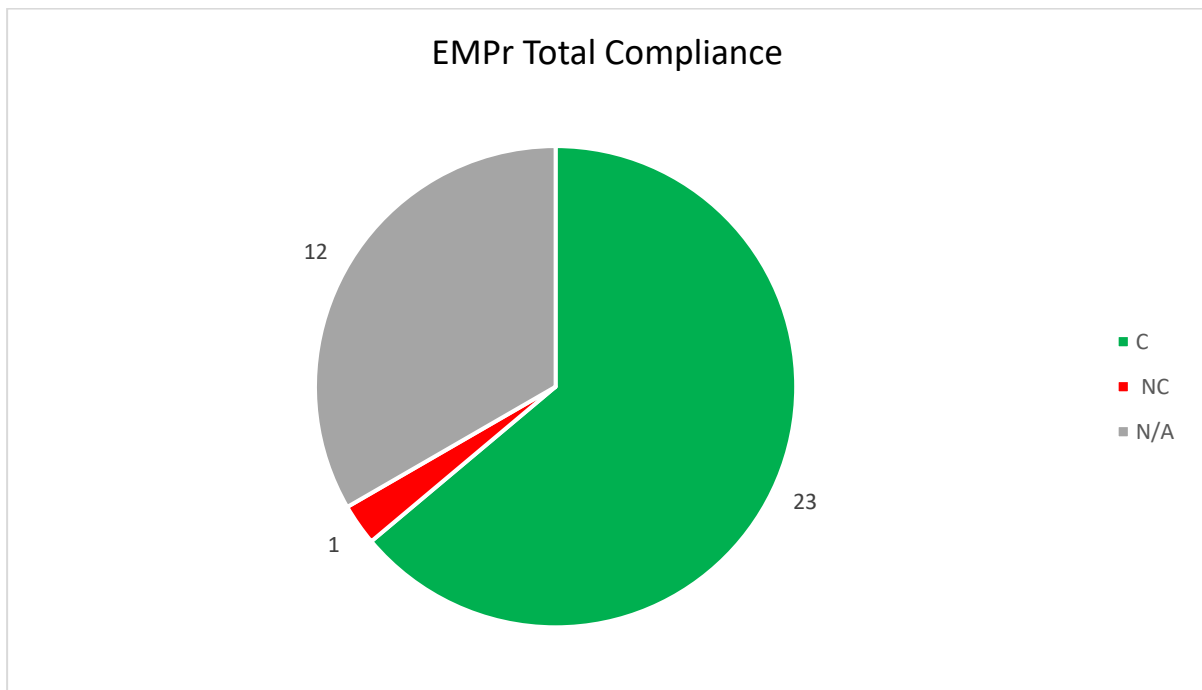


Figure 6-5 - Overall count findings on compliance to the EMPr Commitments

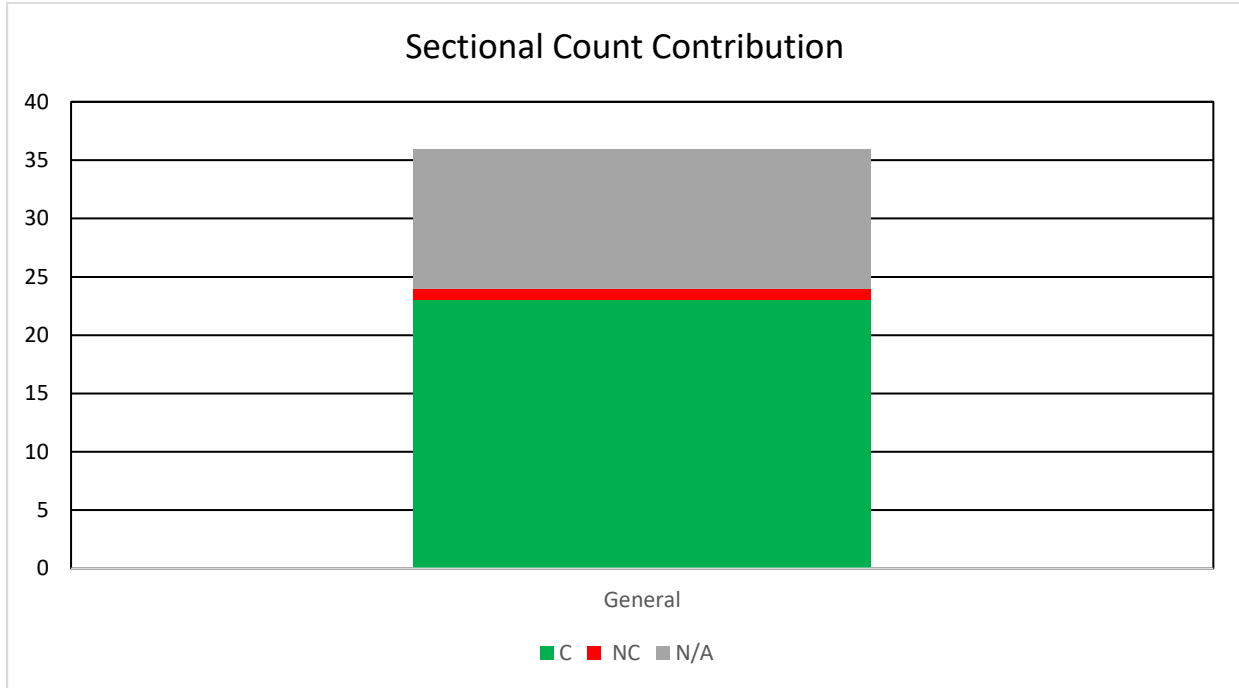


Figure 6-6 - Number/Count contribution of findings made to the EMPr Commitments per Section

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.

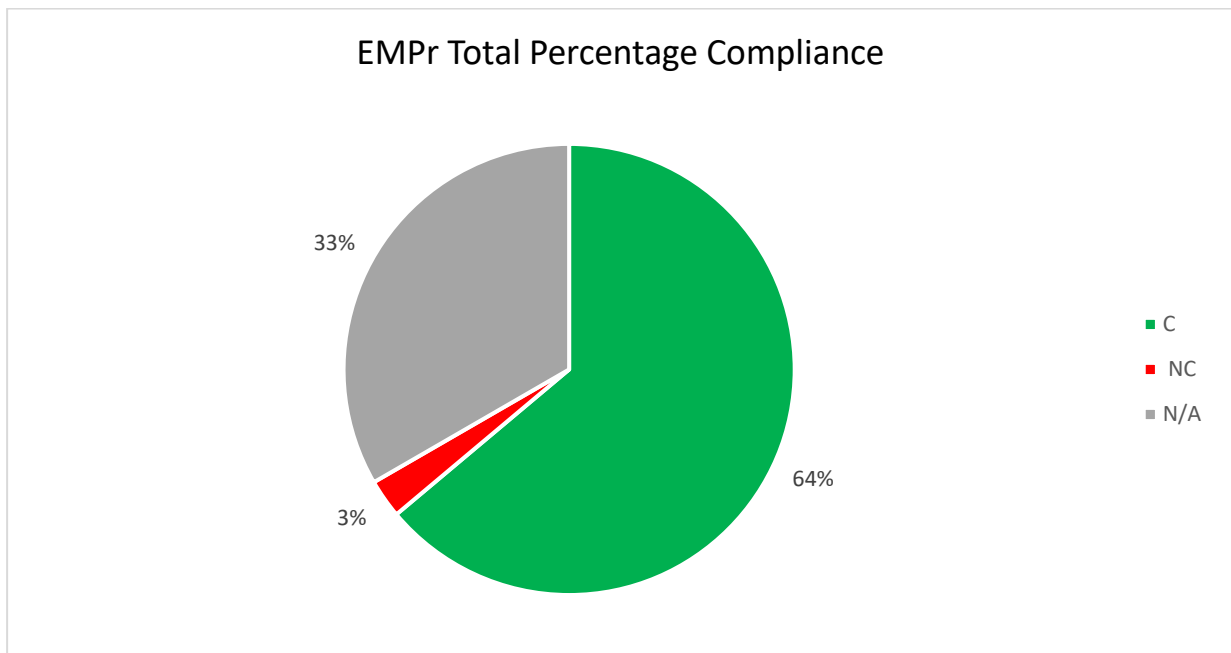


Figure 6-7 - Overall percentage findings on compliance to the EMPr Commitments

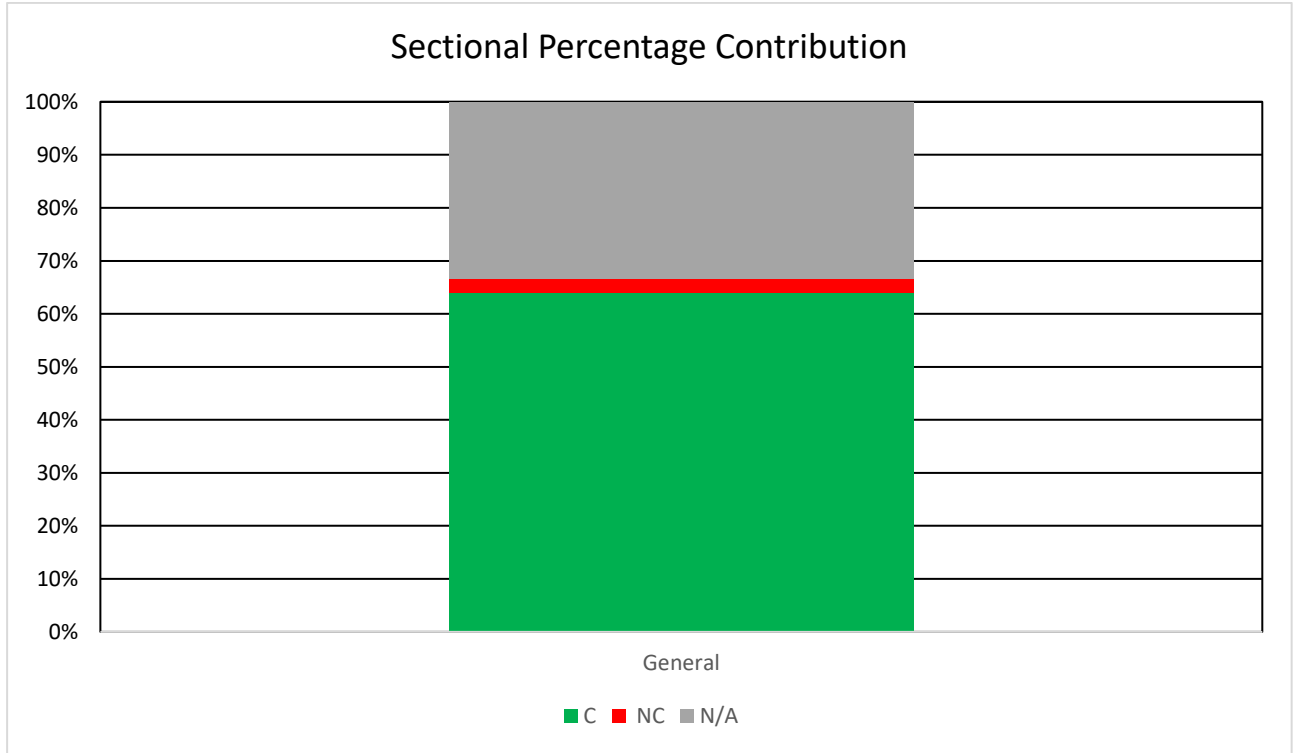


Figure 6-8 - Percentage contribution of findings made to the EMP commitments per Section

7 RECOMMENDATIONS

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

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

8 EFFECTIVENESS OF THE EMPR

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 MiBK2 plant at Sasol One Facility and compared the operations to the approved EMPr and compiled this report to the best of my knowledge. This section should be read with **Section 2.**

Signed at _____Midrand_____ on this the _____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 – MIBK2 Project

Environmental Management Programme Operational Phase

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

	Impact Management Outcome	Impact Management Action
1. General	Maintenance	1.1 Appropriate maintenance functions must be performed by Sasol Solvents, as required, Responsible parties must be competent in the necessary maintenance tasks.
2. handling and loading of products	Awareness of personnel of the associated hazards in transporting acetone on the road and actions to take in case of an accident.	2.1 Formal training of workers in the hazards of acetone to be transported by road.
	limit the probability for an unstable load, which may result in a turnover of the road tanker at a steep crinkle road or when the road is in a bad condition.	2.2 Personnel should be trained on a regular base to ensure that they stick to the prescribed loading procedures to prevent overfilling of a road tanker.
	prevent the possibility of overfilling of the vehicle, which may result in an unstable load during transportation	2.3 The supervisor should confirm the Load of the tanker before departure.
	Awareness of personal of the associated hazards in offloading acetone	2.4 Personnel handling products at the discharge areas should be trained how to handle and how to operate the supporting equipment and emergency equipment.
3 Emergency response plan	Emergency preparedness.	3.1 A proper and adequate emergency response plan needs to be developed, maintained and practiced.
		3.2 Notify Emergency services of any accidental scenarios which take place on the public road and on site
4. Soil and soil erosion	Manage impact on Soil	4.1 There will be no area of exposed soil
		4.2 The site will be paved in the process areas
5 Surface water	Contamination of rainwater	5.1 Process, loading and storage areas will be bunded
		5.2 A roof will be placed over parts of the storage areas at the plant to limit the amount of rainwater within the plant. Each storage tank at the tank

	Prevent accidental spillage when offloading acetone	farm has a fixed roof that cover the tank.
		5.3 Additional water will go to the sump and storm water
		5.4 Restrict access to dangerous or contaminated areas until the clean-up action have been completed. Incase of the spillage on the road or loading/ offloading area
		5.5 Ensure trained personal or trained contractors conduct clean-up activities.
		5.6 Self containing pump will be used (Double mechanical seals, canned pumps or similar technology)
		5.7 Nitrogen blankets will be used in storage tanks
		5.8 Self containing pump will be used (Double mechanical seals, canned pumps or similar technology)
		5.9 All spillages of chemicals will be sent to chemical sewers and storm water system
6 Ground water	Ground water may be contaminated through percolation of contaminants as a result of spillages	6.1 Contaminated areas to be properly rehabilitated
		6.2 Measures to contain and manage spills of chemical and wastewater
		6.3 All run- off to be routed to storm water systems
	Loading bays may be susceptible for spills. Rainwater that becomes contaminated and is not properly managed may also be a source of groundwater pollution	6.4 Process areas will be an impermeable surface within a bunded area
		6.5 All effluent (including rainwater) will be collected in a sump
		6.6 During operation of the plant, it must be ensured that all the polluted run-offs will be collected and reprocessed in the plant. Ensure all surfaces are concreted with watertight joints to reduce the possibility of groundwater pollution