



Our reference: SO-ENV-1342

29 November 2024

Your Ref: EA nr Exemption 59

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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 Vapour control unit at the road loading facility, Environmental Authorisation with reference Exemption 59, dated October 2024.

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

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Further, in alignment with Chapter 5 Part 4 of the regulation, regulation 36 allows amendment to the impact management action of an EMP 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 Vapor control unit at the road loading facility.

Yours faithfully,

Signed by: Johann Van Wyk
Signed at: 2024-11-29 12:55:56 +02:00
Reason: I approve

Johann Van Wyk

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Annexure A

Audit report.

Sascon Vapour control unit– ref [Exemption 59]



Sasol South Africa Ltd

**VAPOUR CONTROL UNIT (VCU)
ENVIRONMENTAL AUTHORISATION (REF.
NO: EXEMPTION 59) AND ENVIRONMENTAL
MANAGEMENT PROGRAMME**

Compliance Audit Report: November 2019 - July
2024





Sasol South Africa Ltd

**VAPOUR CONTROL UNIT (VCU)
ENVIRONMENTAL AUTHORISATION (REF.
NO: EXEMPTION 59) AND ENVIRONMENTAL
MANAGEMENT PROGRAMME**

Compliance Audit Report: November 2019 - July 2024

TYPE OF DOCUMENT (VERSION) CONFIDENTIAL

PROJECT NO. 41106913

DATE: OCTOBER 2024



Sasol South Africa Ltd

VAPOUR CONTROL UNIT (VCU) ENVIRONMENTAL AUTHORISATION (REF. NO: EXEMPTION 59) AND ENVIRONMENTAL MANAGEMENT PROGRAMME

Compliance Audit Report: November 2019 - July 2024

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QUALITY CONTROL

Issue/revision	First issue	Revision 1	Revision 2	Revision 3
Remarks	Vapour Control Unit (VCU) Audit _Final Audit Report			
Date	October 2024			
Prepared by	Matilda Mbazo			
Signature				
Checked by	Anri Scheepers			
Signature				
Authorised by	Anri Scheepers			
Signature				
Project number	41106913			
Report number	01			
File reference	\\corp.pbwan.net\za\Central_Data\Projects\41100xxx\41106913 - SASOL A AUDITS 2024\41 EPA\01-Reports\01-Final\			

CONTENTS

1	INTRODUCTION	1
1.1	TERMS OF REFERENCE	1
1.2	SASOL SASOLBURG – VAPOUR CONTROL UNIT	1
1.3	PROJECT TEAM	2
2	AUDIT SCOPE	3
2.1	DISCLAIMER	5
2.2	ASSUMPTIONS AND LIMITATIONS	5
3	AUDIT METHODOLOGY	7
3.1	AUDIT CHECKLIST	7
3.2	SITE INSPECTION AND INTERVIEWS	7
3.3	INFORMATION CONSIDERED	7
3.4	ASSESSMENT EVALUATION METHODOLOGY	8
4	AUDIT FINDINGS	10
4.1	ENVIRONMENTAL AUTHORISATION	10
4.2	ENVIRONMENTAL MANAGEMENT PROGRAMME	18
5	PROGRESS AGAINST PREVIOUS AUDIT FINDINGS	25
6	SUMMARY OF THE AUDIT FINDINGS	26
6.1	SASOL SASOLBURG VCU EA COMPLIANCE	26
6.2	SASOL SASOLBURG VCU EMPR COMPLIANCE	29
7	RECOMMENDATIONS	32
8	EFFECTIVENESS OF THE EMPR	33

INDEPENDENT AUDITOR DECLARATION	34
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TABLES

Table 1-1 - Details of the Audit Team	2
Table 2-1 - Regulation 34 and Appendix 7 of the EIA Regulations (2014)	3
Table 3-1 Levels of Compliance	8
Table 4-1 - Environmental Authorisation (reference: Exemption 59 dated 12 December 2001) and Amendment (reference: Exemption 59 dated 28 November 2017) Audit Findings	10
Table 4-2 - Environmental Management Programme Audit Findings	18
Table 5-1 – Progress against previous findings	25
Table 6-1 - Summary of EA Compliance Audit Findings	26
Table 6-2 - Summary of EMPr Compliance Audit Findings	29

FIGURES

Figure 5-1 – Percentage comparison of Environmental Authorisation compliance levels from 2019 to 2024	25
Figure 6-1 - Number/Count contribution of findings made to the EA conditions per section	27
Figure 6-2 - Overall count findings on compliance to the EA commitments	27
Figure 6-3 - Overall percentage findings on compliance to the EA Commitments	28
Figure 6-4 - Overall count findings on compliance to the EMPr Commitments	30
Figure 6-5 - Number/Count contribution of findings made to the EMPr Commitments per Section	30
Figure 6-6 - Overall percentage findings on compliance to the EMPr Commitments	31
Figure 6-7 - Percentage contribution of findings made to the EMPr Commitments per Section	31

APPENDICES

APPENDIX A

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 Exemption 59) for the conversion of Vapour Control Unit (VCU) 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 VCU located at the Sasol One site in Sasolburg (reference number: Exemption 59), dated 12 December 2001 and issued by the Department of Tourism, Environmental and Economic Affairs now the Department of Economic, Small Business Development, Tourism and Environmental Affairs (DESTEA);
- First amendment of the EA for the VCU located at the Sasol One site in Sasolburg (reference number: Exemption 59), dated 28 November 2017 and issued by the DESTEA. The amendment included:
 - 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
- Second amendment of the EA for the VCU located at the Sasol One site in Sasolburg (reference number: Exemption 59), dated 22 November 2019 and issued to Sasol by the DESTEA. The amendment included:
 - Change of responsible person and company name (from Sasol South Africa (Pty) Ltd to Sasol South Africa Ltd)
- EMPr included in the Scoping Report, dated 02 July 2001.

1.2 SASOL SASOLBURG – VAPOUR CONTROL UNIT

The plant entails the routing of the vapours resulting from the top loading of road tankers from the adjacent loading racks at the road loading facility within the Sasol One site, to a VCU. The vapours are collected through a conical manifold at the loading racks and then transported to the VCU where they are ignited. The VCU contains burners inside on the incineration cylinder. The emissions from the unit will be predominantly NO (Nitrogen monoxide) and CO, (Carbon monoxide), CO₂ /NO. A minimum of 99 % of vapours would be removed from the racks through this project, making it highly effective.

There are various products handled at the VCU and are classified hazardous due to their toxicity and flammability nature, such as Methanol, Pentylol, MIBK, Acetone, Ethanol bottoms and Solumix to mention a few.

1.3 PROJECT TEAM

WSP auditors, Matilda Mbazo and Yvette Mmanasoe, completed a site inspection of the VCU at the Sasol One Site 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 2 years 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 ESIA's, application EAs, water use licenses, Section 24 G, Mining Rights and Prospecting Rights.

2 AUDIT SCOPE

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

The objective of the audit was to:

- Assess the level of compliance with the commitments of the EA for the VCU
- Assess the level of compliance with the commitments of the EMPr that was submitted as part of the Scoping Report for the authorisation of the conversion of the VCU, 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 VCU 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 VCU operations. Regulation 34 of the 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.	None requested

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 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, as detailed in **Section 4**. Key personnel interviewed during the audit included:

- Suyen Van Zyl – SHE Environmental Specialist;
- Shane Van Rooyen – Area Manager;
- Smanga Hlatshwayo - Area Manager.

3.3 INFORMATION CONSIDERED

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

- Environmental Authorisation (Reference number: Exemption 59) dated 12 December 2001;
- Amendment of an Environmental Authorisation (Reference number: Exemption 59) dated 28 November 2017;
- EMPr included in the EIA Scoping Report of the Sascon VCU dated 02 July 2001;
- Notification of Change of Contact Details of the Business Representative (Reference number: SO-env-1285) dated 08 July 2024;
- External Audit of EAs/EMP: Site Services: Sascon Vapour Recovery Unit by Centre for Environmental Management (CEM) (Reference number: CEM 2018/141) dated 28 August 2019;
- Air Emissions Licence (AEL) (Reference number: FDDM-MET-2013-22) dated 23 August 2023;
- Baseline Health Risk Assessment (Reference number: SEO-079-2023-CRS-HRA) dated 04 September 2023;
- Groundwater Monitoring Report (41105760) dated November 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;
 - Standard Operation Procedure to Operate the VCU (Reference number: SL-RRL-WI-036) dated 01 October 2019;
 - Sasol Annual Emissions Report (Reference number: FDDM-MET-2013-22-R1) dated 29 August 2023;
 - 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)	<p>When an activity or commitment has been implemented, completed, is on-schedule or is maintained on an ongoing basis.</p> <p>Condition/mitigation measure/commitment has been achieved with evidence provided in the form of a document or site verification.</p>
Non-compliant (NC)	<p>When an activity or commitment has not been complied with in its entirety/certain aspects thereof have not been addressed.</p> <p>When a commitment has not been undertaken, not been completed according to plan, or where any unlawful actions have been identified. Non-compliant conditions are given target completion dates as follows:</p> <ul style="list-style-type: none"> — Short term: 0 – 6 months. — Medium term: 6 – 12 months. — Long term: 12 - 18 months

Compliance Level	Definition
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: Exemption 59 dated 12 December 2001) and Amendment (reference: Exemption 59 dated 28 November 2017) Audit Findings

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
Brief Description of the Activity				
	Loading Operations at Sasol South Africa (Pty) Ltd acting through its Sasolburg Operations proposed to reroute the vapours (regularly flammable and toxic) resulting from the top loading of the road tankers from the loading racks. These vapours will then be transported to the Vapour Control Unit (VCU), where they will be ignited. The emissions from the unit will predominantly be Nitrogen monoxide, Carbon monoxide and Carbon dioxide.	C	<p>The auditor was informed that the VCU activity, as description in the EA and first amendment, has not changed.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation Visual Site Observation EA (Exemption 59) 	None
Location				

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	The work will be done within Sasol one Site that forms part of Sasol South Africa (Pty) Ltd acting through its Sasolburg Operations, on subdivisions 6 & 2 of Driefontein No. 2 subdivision 5 & 4 of Montrose and certain subdivisions of the farms Saltberry Plain, Roseberry Plain, Herewaarde and Antrim, in the Sasolburg magisterial district. The area on which work will be done is already being used for chemical processes.	C	<p>The authorised activity is carried out at the Sasol One site Complex, on sub-divisions 6 & 2 of Driefontein No. 2, sub-division 5 & 4 of Montrose, and certain sub-divisions of the farms Saltberry Plain, Roseberry Plain, Herewaarde and Antrim, in the Sasolburg magisterial district, as detailed in the EA location details.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> EA location details (reference number Exemption 59) 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	<p>The auditor noted based on the site-wide notification dated 08 July 2024, the accountable person and the contact details was changed from “Mr. Rightwell Laxa”, to the following :</p> <p>Ntokozo Gcabashe ntokozo.gcabashe@sasol.com 016 960 2007</p> <p><i>Evidence:</i></p>	None

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<ul style="list-style-type: none"> Notification of Change of Contact Details of the Business Representative (Ref: SO-env-1285) dated 08 July 2024. 	
Decision				
	The scoping report of the above-mentioned chemical plant development has been accepted and permission for the modification of the road tanker loading facility by installing a vapour combustion unit is granted.	C	<p>This statement is noted by the holder of the EA.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> EIA Scoping Report of the Sascon VCU dated 02 July 2001 	None.
Special Conditions				
	Jobs created during construction, shall preferably be allotted to local people in order to address soaring unemployment figures	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.
	The project team shall do Hazard and Operability Studies (HAZOPs).	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.
Standard Conditions				

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	The applicant must advertise the authorisation of this specific activity in terms of Section 22 of the Environment Conservation Act, 1989 (Act 73 Of 1989) : Schedule 1 of the Government Gazette No. R1182. Proof of this advertisement must be submitted to this Department within 14 (fourteen) from the (date of this authorisation	N/A	Noted. The advertisement of the RoD was considered for the pre-construction and construction phase; this condition is outside the current 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 Cobalt Catalyst Tank Farm and whether Sasol complies with all statutory requirements and are in possession of all the necessary permits, authorisations or any other official documents.	None.
	A copy of this exemption and a copy of the relevant Scoping report shall be made available at the site office at all times. Staff members and contractors shall be conversant with its content.	C	Sasol Operations implemented SAP Environmental Compliance (SAP EC) as an environmental management system tool to ensure and capture proof of compliance with conditions in the EA, EMP and other authorisations. The copy of the RoD, EA amendments and the Scoping report is available on site and on the SAP EC intranet. <i>Evidence:</i> <ul style="list-style-type: none"> Visual Site Observation 	None.
	The Department must be granted access to the property at any time to investigate any possible	N/A	Noted. The holder of the authorisation noted this condition.	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	environmental impacts that may be caused by this development.			
	The records of compliance/non-compliance with conditions of this authorisation must be kept in good order. Such records must be available to this Department within 7 (seven) days from the date of written registration from this Department.	C	<p>Records of compliance/non-compliance with conditions of this authorisation were kept in good condition and were readily available on the SAP-EC system, therefore, should be readily available upon the Departments request. No request was made by the Department during the current audit period for records or documents. In addition, the previous 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"> Onsite Observation External Audit of EAs/EMP: Site Services: Sascon Vapour Recovery Unit by CEM (Reference no: CEM 2018/141) dated 28 August 2019 	None.
	Non-compliance with or any deviation from the conditions of this authorisation as set out in this Record of Decision is regarded as an offence and will be dealt with in terms of Section 29, 30 and/or 31A of the Act.	N/A	This condition is noted by the holder of the EA. No deviations from the EA conditions were observed during the current audit.	None.
Key Factors for the Decision				

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	Employees' safety will be enhanced as the volatile organic gasses will be captured and combusted.	N/A	<p>This statement is noted by the holder of the EA.</p> <p>The Volatile Organic Compound (VOC) emissions at VCU 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.</p> <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 ■ Sasol Annual Emissions Report (Reference number: FDDM-MET-2013-22-R1) dated 29 August 2023 ■ Baseline Health Risk Assessment (Ref: SEO-079-2023-CRS-HRA) dated 04 September 2023 	None.
	This project is an upgrading of an existing facility. The area is already actively used for loading chemicals.	N/A	This statement is noted by the holder of the EA.	None.

Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
			<p>The VCU is located adjacent to the existing road loading facility.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Observation 	
	Though the natural disturbance is inescapable, no major environmental harm will be inflicted to the environment.	N/A	<p>This statement is noted by the holder of the EA.</p> <p>The VCU facility is located within Sasol One Site which is in an industrial zoned area.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 	None
Duration and date of expiry				
	<p>The permit will continue to be valid for 5 years as long as:</p> <ul style="list-style-type: none"> a) Development shall have started within 2 years from the date of issue of the Record of Decision. b) The development does not pose itself as an environmental hazard 	N/A	<p>Noted. This condition is outside the current audit period and refers to a construction/development requirement of the activity and therefore was not audited.</p>	None.
Appeal				
	Should this record of decision be queried, an appeal under section 35(3) of the Act, may be done in writing within 30 (thirty) days from the	N/A	<p>Noted. This condition is outside the current audit period and refers to a requirement pre-</p>	None.



Ref.	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person
	<p>date on which this record of decision was advertised and must be directed to :</p> <p>The MEC: Department of Tourism, Environment and Economic Affairs</p> <p>Free State Province</p> <p>P.O. Box 264</p> <p>Bloemfontein</p> <p>9300</p>		<p>commencement of the activity and therefore was not audited.</p>	



4.2 ENVIRONMENTAL MANAGEMENT PROGRAMME

Table 4-2 below provides the compliance of Sasol with the conditions within the EMP that were included in the EIA Scoping Report for the VCU at the Sasol One site in Sasolburg, dated 10 July 2001.

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)
8.3 Effects on Air								
	<p>The project involves the further reduction of VOC emissions resulting from the road tanker loading at Sascon. These vapours cannot be reworked and pose an environmental & health hazard.</p> <p>The project to construct the new loading racks did address the emissions resulting from the racks through the installation of mass flow meters and new</p>	C	<p>The Volatile Organic Compound (VOC) emissions at VCU 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</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>pumps, but the loading process still results in VOC's emitted to atmosphere.</p> <p>The project would result in a further 99% decrease of VOC's emitted from this activity and would result in a health improvement to the operators of the loading racks.</p>		<p>exposure to chemical, physical, ergonomics and biological hazards.</p> <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- 					

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)
			HRA) dated 04 September 2023					
8.4 Effects on surface water								
	No expected impact as all surface water - additional stormwater - is to be treated through the existing system.	C	<p>The Auditor observed that there was no impact on the surface water at the VCU. All water at the Sasol One Site is considered 'dirty' water and is routed to Bioworks for reworking for reuse.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation IWWMP and SWMP (SO-env-1192) dated December 2023 	None.	N/A	N/A	N/A	N/A
8.5 Effects on groundwater								
	No final leachable quality will be expected.	C	The Auditor was informed that there is no leachable quality at 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)
			VCU. The groundwater monitoring report confirms no exceedances on Sasol One Site. <i>Evidence:</i> <ul style="list-style-type: none"> Verbal Confirmation Groundwater Monitoring Report (41105760) dated November 2023 					
8.6 Effects on land and soil								
	No effect on the current process where no solid wastes are produced or handled.	C	The Auditor was informed that there are no solid wastes produced or handled from the VCU process, as it is a supporting plant of the road loading facility. <i>Evidence:</i> <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)
			<ul style="list-style-type: none"> Verbal Confirmation SOP for Operate the VCU (SL-RRL-WI-036) dated 01 October 2019 					
8.6 Fauna and flora								
	The proposed project will be contained within Sasol I, situated within an industrial area. Thus, there will be no impact on fauna and flora.	C	<p>The VCU facility is located within Sasol One Site which is in an industrial area. Therefore, there is expected impact on fauna or flora.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Visual Site Observation 	None.	N/A	N/A	N/A	N/A
8.7 Socio-economic effects								
	There will be minor positive effects with the creation of temporary construction jobs for approximately 20 people.	N/A	Noted. This condition is outside the current audit period and refers to a requirement pre-	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 construction phase is expected to last for 2 to 3 weeks.		commencement of the activity and therefore was not audited.					
8.8 Safety and risk assessment								
	<p>Chronic health problems arising from these vapours will be reduced almost entirely. These vapours are also hazardous in terms of their flammability, which will be reduced as well with the proposed installation of this system.</p> <p>SASCON has HAZOP (Hazard and operability) and FMEA (Failure Mode Effect Analysis) procedures. These are studies where the whole process and all the equipment involved is reviewed in detail by the engineering design and operation team, and potential failures or departures in the normal</p>	N/A	The Auditor was informed that this condition is out of scope, therefore it was not audited.	None.	N/A	This condition is not practical to the scope of works of this audit.	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)
	mode of operation are assessed. Safety procedures are developed to cancel or lessen the effects of such equipment malfunctions/operator error. These procedures are still to be carried out on the proposed project.							

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 from the 2019 and 2024 audits are provided in **Figure 5-1** and **Table 5-1** below, and provides a summary of the audit findings for the previous and current audits (2019 and 2024). The 2024 audit identified zero non-compliant conditions.

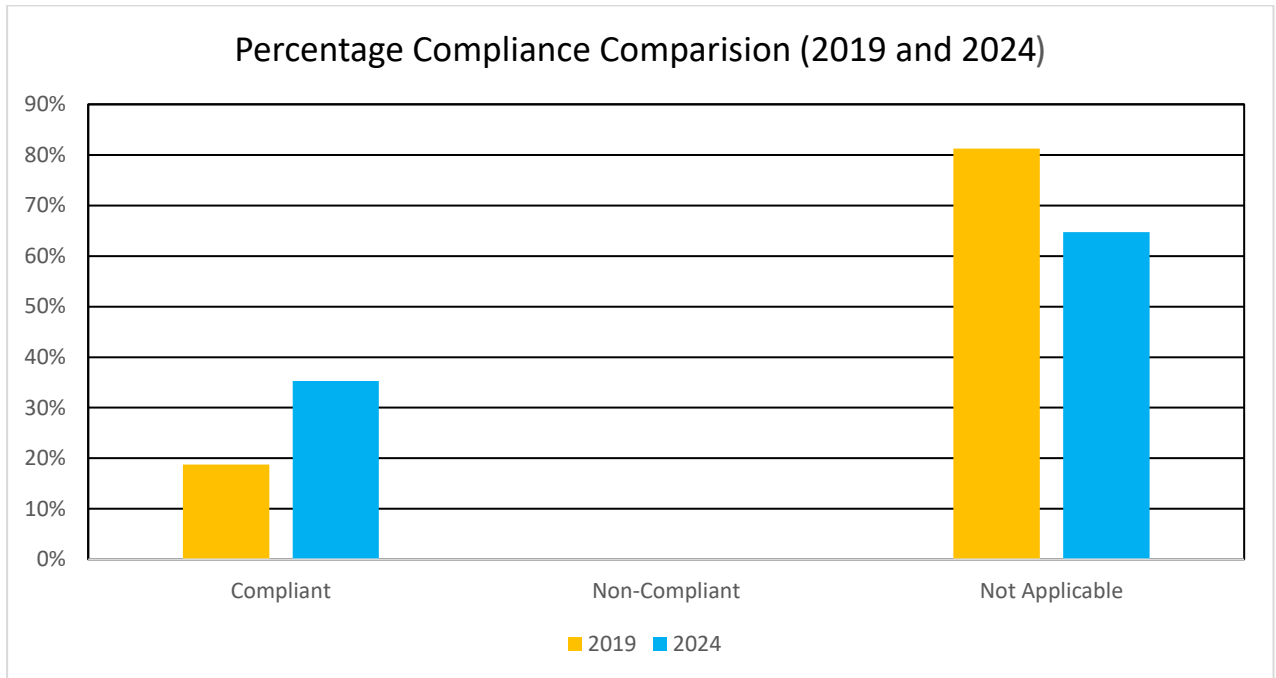


Figure 5-1 – Percentage comparison of Environmental Authorisation compliance levels from 2019 to 2024

Table 5-1 – Progress against previous findings

Ref	Commitment	2019 Status	2019 Finding	2023 Status	2022 Finding
EA Conditions					
Standard Conditions					
	The Department must be granted access to the property at any time to investigate any possible environmental impacts that may be caused by this development.	C	Compliant.	N/A	Noted. The holder of the authorisation noted this condition.

6 SUMMARY OF THE AUDIT FINDINGS

6.1 SASOL SASOLBURG VCU 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
Decision	1	1	0	0
Special Conditions	2	0	0	2
Standard Conditions	6	2	0	4
Key Factors in Decision	3	0	0	3
Duration and date of expiry	1	0	0	1
Appeal	1	0	0	1
Total	17	6	0	11
Total Percentage		35%	0%	65%
Percentage Compliance with Applicable Conditions	100%			

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

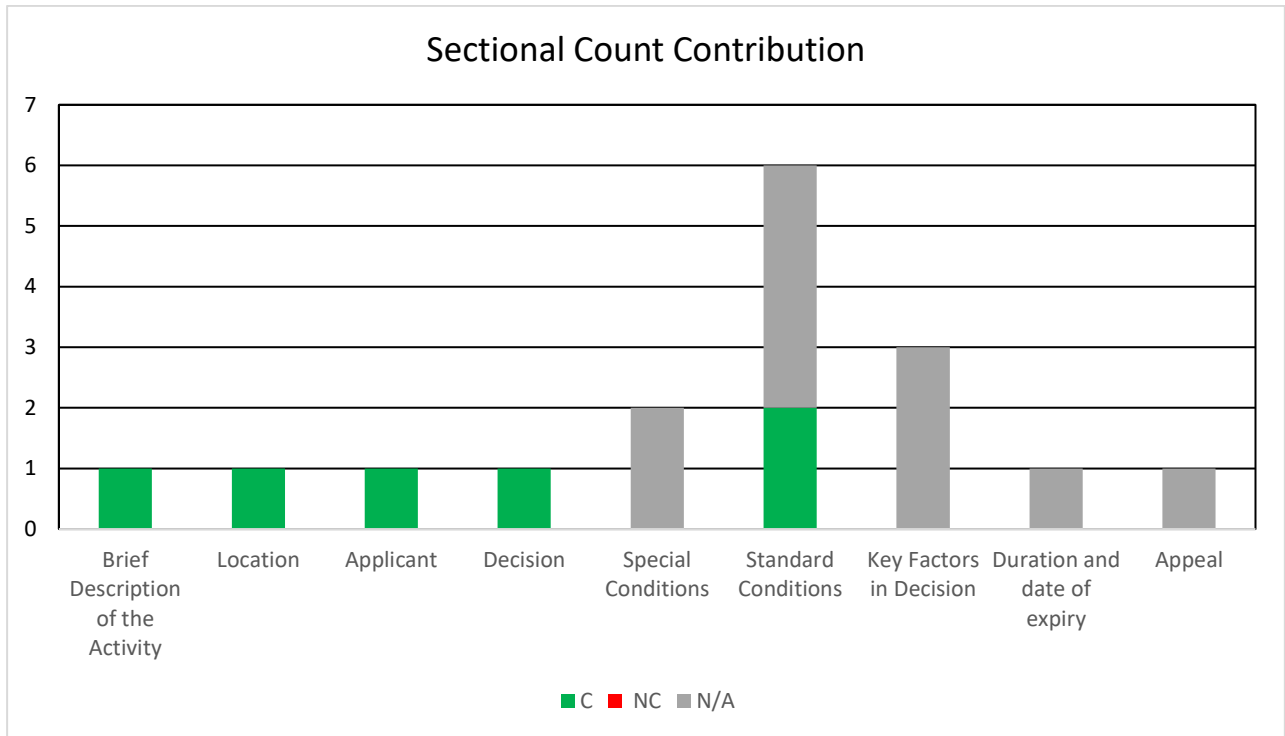


Figure 6-1 - Number/Count contribution of findings made to the EA conditions per section

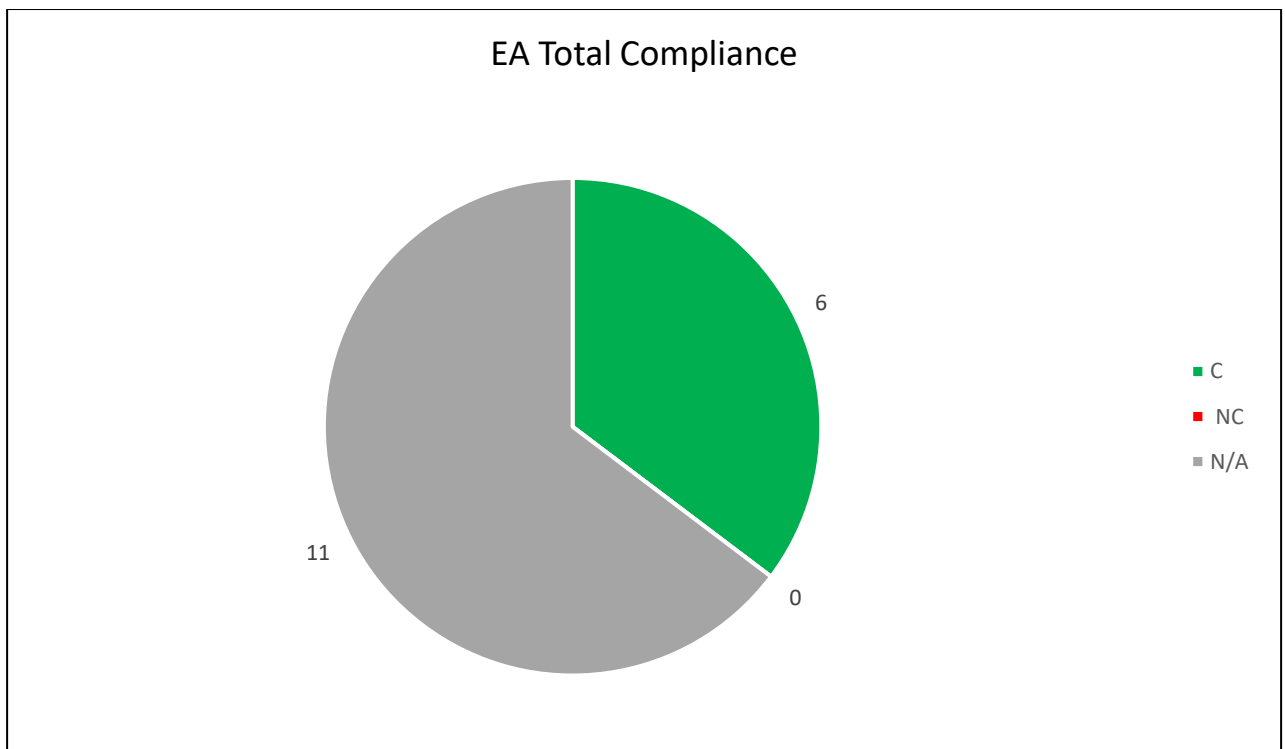


Figure 6-2 - Overall count findings on compliance to the EA commitments

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

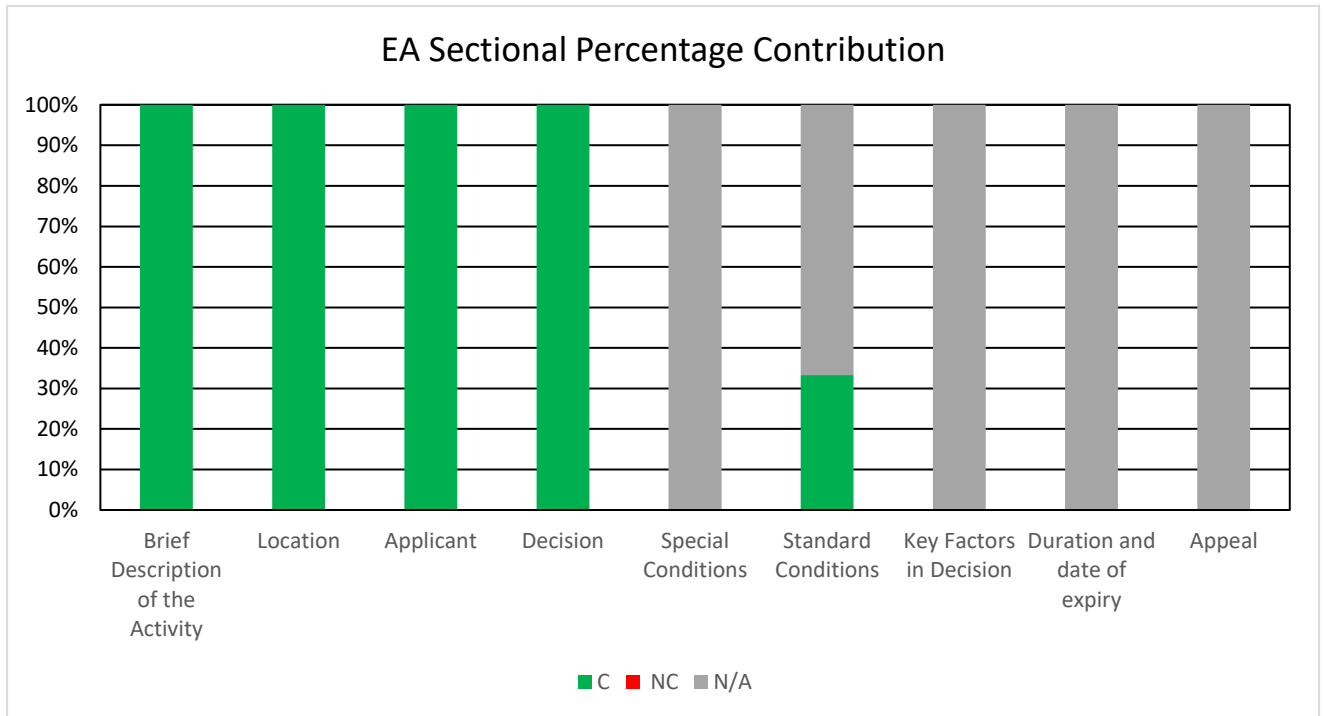


Figure 6-3 - Percentage contribution of findings made to the EA Commitments per Section

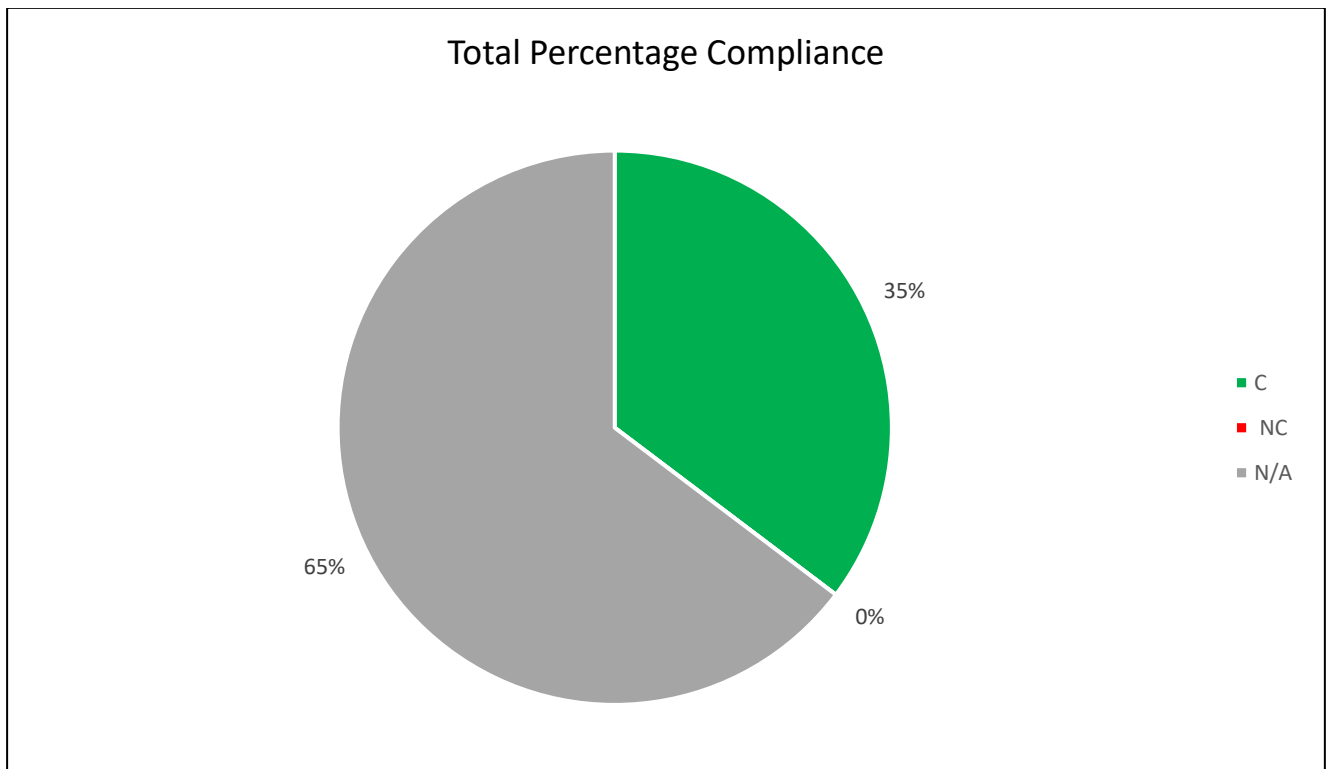


Figure 6-3 - Overall percentage findings on compliance to the EA Commitments

6.2 SASOL SASOLBURG VCU 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
Effects on air	1	1	0	0
Effects on surface water	1	1	0	0
Effects on groundwater	1	1	0	0
Effects on land and soil	1	1	0	0
Fauna and flora	1	1	0	0
Socio-economic effects	1	0	0	1
Safety and risk assessment	1	0	0	1
Total	7	5	0	2
Total Percentage		71%	0%	29%
Percentage Compliance with Applicable Conditions	100%			

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

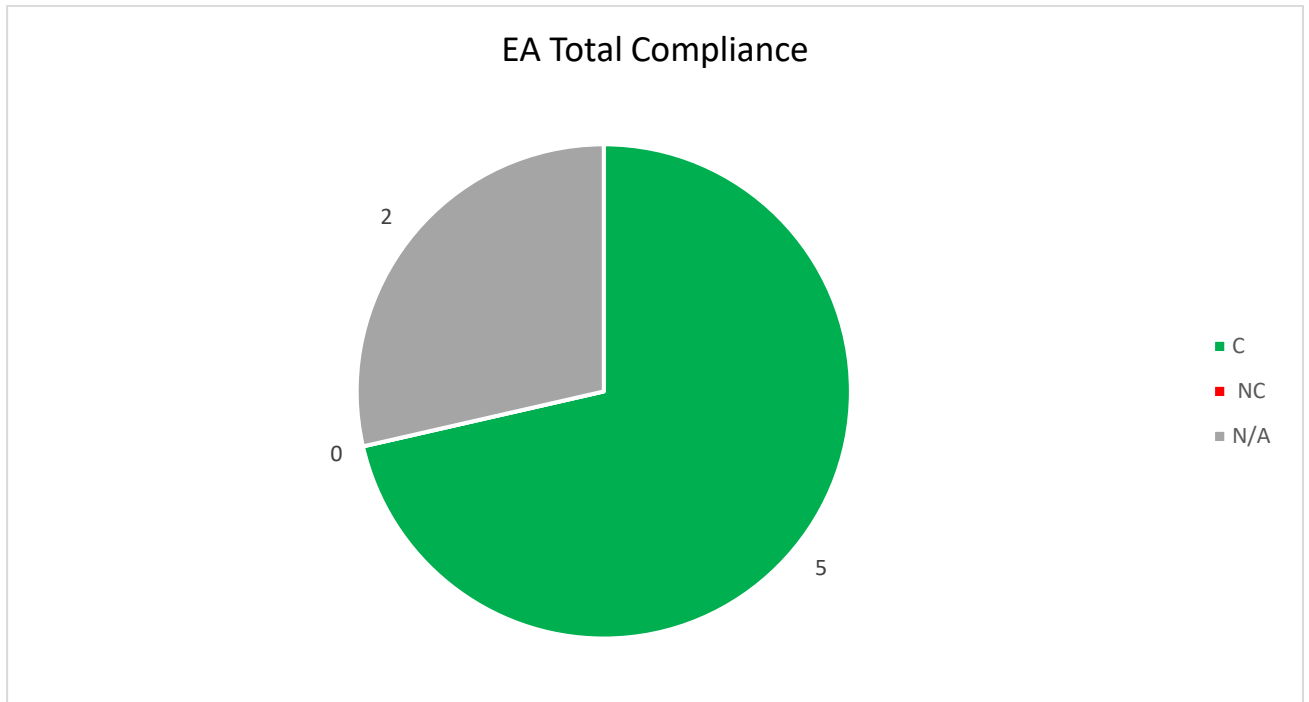


Figure 6-4 - Overall count findings on compliance to the EMPr Commitments

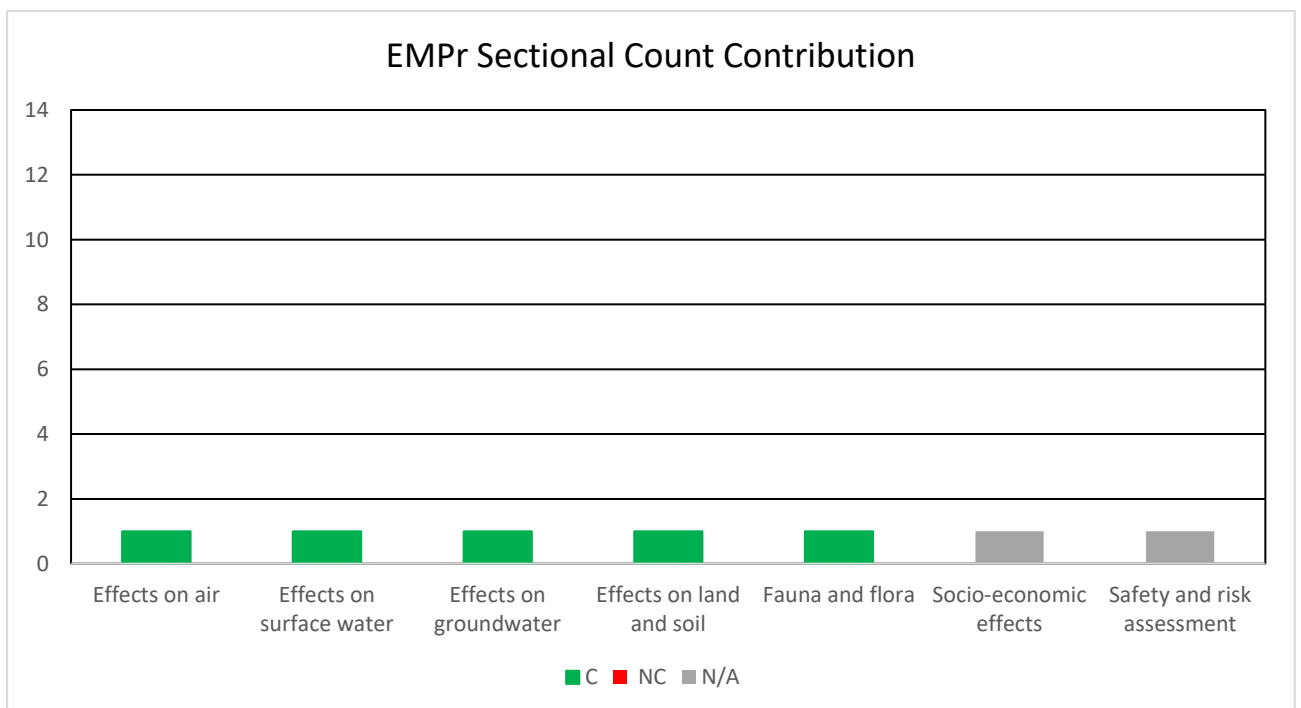


Figure 6-5 - Number/Count contribution of findings made to the EMPr Commitments per Section

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

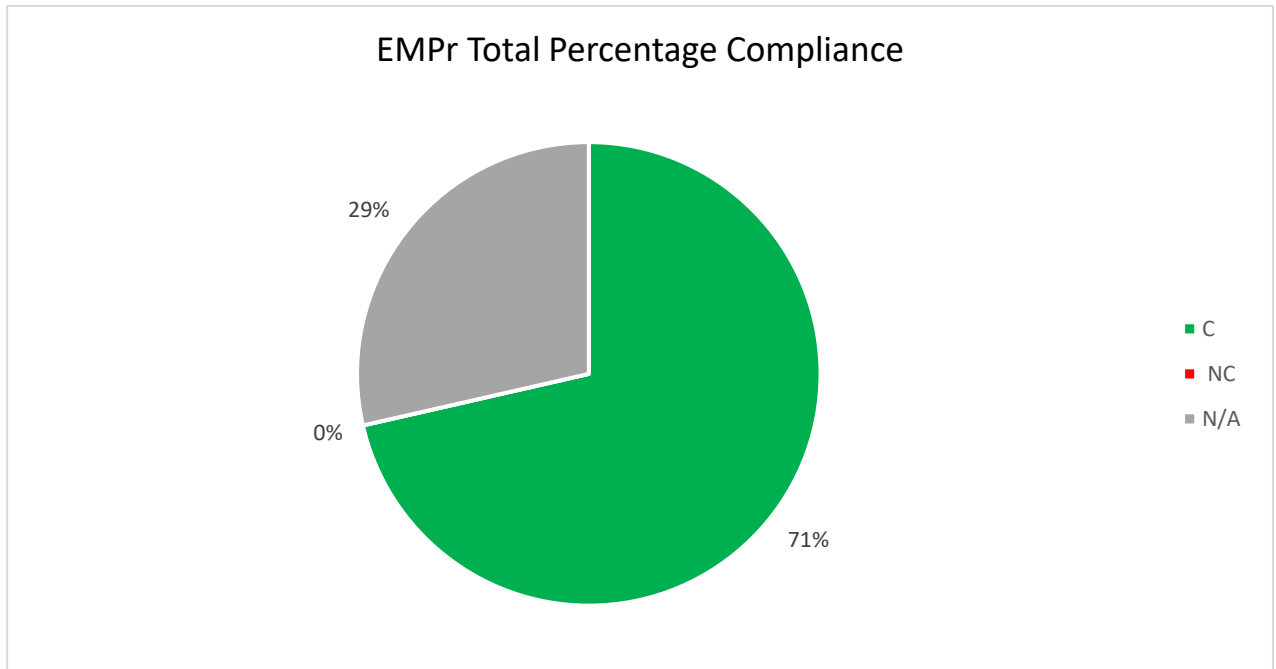


Figure 6-6 - Overall percentage findings on compliance to the EMPr Commitments

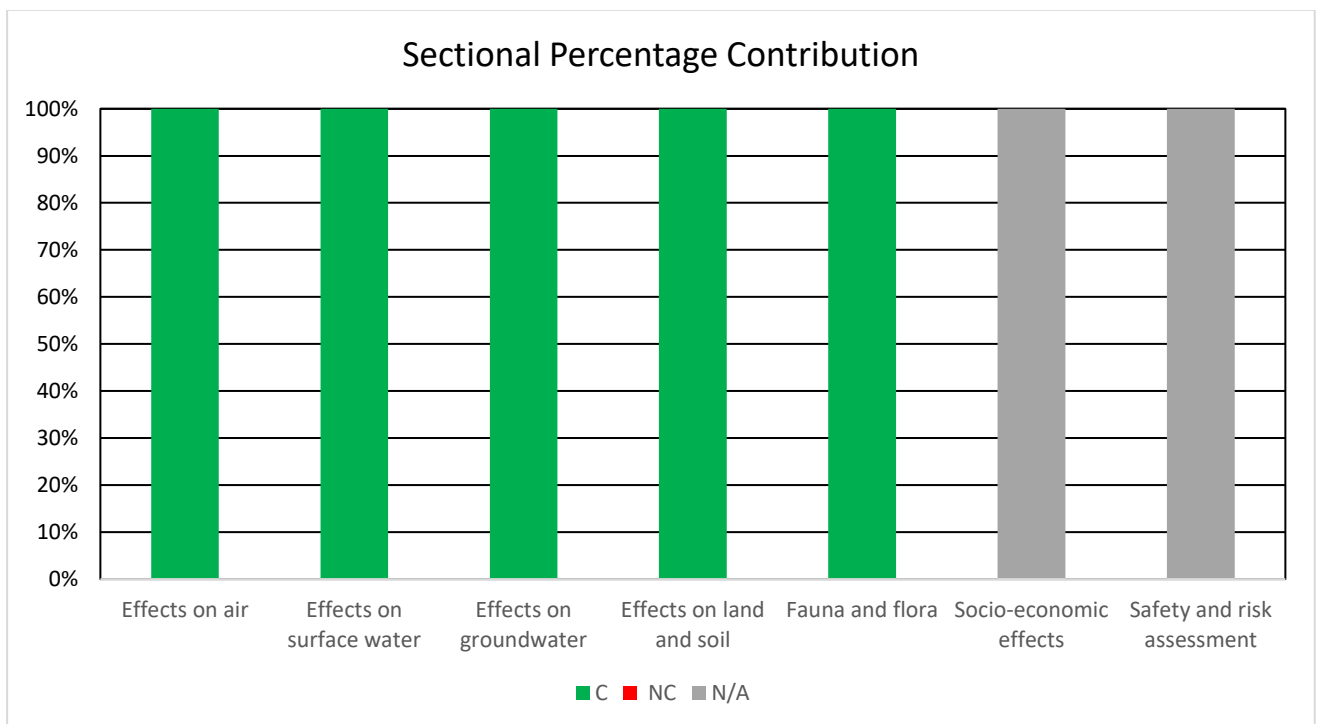


Figure 6-7 - Percentage contribution of findings made to the EMPr Commitments per Section

7 RECOMMENDATIONS

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

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

Signed at _____Midrand_____ on this the _____07 November_____2024

SIGNATURE OF INDEPENDENT AUDITOR

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

Appendix A

AUDITOR CVS



Matilda Mbazo

Earth and Environment, Environmental Planning & Advisory, Graduate Consultant

CAREER SUMMARY

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



2 > years with WSP

Language

Afrikaans, English, Tswana, Ndebele, and Zulu

EDUCATION

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

PROFESSIONAL MEMBERSHIPS

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

PROFESSIONAL HISTORY

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

PROFESSIONAL EXPERIENCE

Environmental Authorisation Audits

FFS Chloorkop Fired Heater



July 2022 to June 2023

ECO: EA and EMPR Compliance Audit

Environmental Auditor : EA and EMPr Annual Compliance Audit

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

October 2022

October 2023

July 2024

Environmental Auditor

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

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

November 2023

Environmental Auditor : EA and EMPr Compliance Audit

Impala Platinum Holdings Limited

June 2024

Environmental Auditor : Norms and Standards Audit

Sasol South Africa Limited and Wood

July 2024 – July 2025

ECO: EA and EMPR Compliance Audit

Sasol Ekandustria Operations

September 2024 – September 2025

ECO: EA, EMPR and WUL Compliance Audit

Investchem (Pty) Ltd

September 2024

Environmental Auditor : EA and EMPr Compliance Audit

Environmental Management Plans

ArcelorMittal South Africa, South Africa

April 2024

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

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

June 2024



Environmental Management Plan for the proposed Hybrid Project.

ENERTRAG, South Africa

2024

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

Legal Audits

Sasol South Africa Limited

March 2024

Undertaken the Regulation 34 Compliance Audits for various Third Parties

Barloworld Ingrain

April 2024

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

Renewables

ENERTRAG, South Africa

2024

Scoping and Environmental Impact Assessment for Impumelelo Wind Facility

Eskom Holdings SOC Ltd

September 2024

Part 2 amendment of an EA for a solar facility

Dissertations and Research Projects

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

2023-2024

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

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

2022

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



Yvette Mmanasoe

Senior Consultant

CAREER SUMMARY

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



1 years with WSP

8 years of experience

Area of expertise

Public Participation Process
Social Impact Assessment
IFC Principles

Language

English, Sepedi, Afrikaans, Sesotho, Setswana, Zulu

EDUCATION

BSc Environmental Geography	2015
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ADDITIONAL TRAINING

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

PROFESSIONAL MEMBERSHIPS

IAIASA
2023



Yvette Mmanasoe

Senior Consultant

PROFESSIONAL HISTORY

WSP Group Africa (Pty) Ltd

August 2023 – present

Agron Moosrivier (Pty) Ltd

July 2015 – April 2023

PROFESSIONAL EXPERIENCE

Area of expertise

Sub-area (if required)

Thungela Resources, Zibulo Underground Extension Mine, RSA

Year 2021/2022

Role

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

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

Year 2019/2020

Role

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

Kriel Housing Development, Kriel Housing Development, RSA

Year 2019/2022

Role

Conduct SIA for the BAR Process



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

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Annexure B – Sascon Vapour control unit– ref [Exemption 59]

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. Air Management of VOC emissions from road tanker loading to minimise the risk on the environment and health hazard The loading process results in VOC's emitted to atmosphere.	The project involves the further reduction of VOC emissions resulting from the road tanker loading at Sascon.
2. Effects on surface water	No expected impact as all surface water - additional stormwater - is to be treated through the existing system.
3. Effects on Groundwater	No final leachable quality will be expected.
4. Effects on land and soil	No effect on the current process where no solid wastes are produced or handled.
5. Fauna and flora	The proposed project will be contained within Sasol I, situated within an industrial area. Thus, there will be no impact on fauna and flora.