



Our reference: SO-ENV-1348

29 November 2024

Your Ref: EA nr E/04/07

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Attention: Deputy Director: Environmental Impact Assessment

ENVIRONMENTAL AUTHORISATION EXTERNAL REPORT SUBMISSION

The Environmental Authorisation applicable for Sasol South Africa Limited, Sasolburg Operations was externally audited during October 2023. The external audit was 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 establishment of the Construction of two HCI storage tanks authorisation with reference E/04/07, dated November 2023.

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

Further, in alignment with Chapter 5 Part 4 of the regulation, regulation 36 allows amendment to the impact management action of an EMPr to be affected immediately by the holder of the environmental authorisation and reflect it in the next environmental audit report. Annexure B contains the 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.

No impact management outcome or impact management action requires amendment for the Construction of two HCI storage tanks.

Yours faithfully

Signed by: Johann Van Wyk
Signed at: 2024-11-29 13:28:19 +02:00
Reason: I approve

Johann Van Wyk

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Sasol South Africa Ltd

**THE CONSTRUCTION OF TWO HCL
TANKS AT SASOL POLYMERS
ENVIRONMENTAL AUTHORISATION (REF.
NO: E/04/07) AND ENVIRONMENTAL
MANAGEMENT PROGRAMME AUDIT**

Compliance Audit Report: November 2023





Sasol South Africa Ltd

THE CONSTRUCTION OF TWO HCL TANKS AT SASOL POLYMERS ENVIRONMENTAL AUTHORISATION (REF. NO: E/04/07) AND ENVIRONMENTAL MANAGEMENT PROGRAMME AUDIT

Compliance Audit Report: November 2023

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Sasol South Africa Ltd

THE CONSTRUCTION OF TWO HCL TANKS AT SASOL POLYMERS ENVIRONMENTAL AUTHORISATION (REF. NO: E/04/07) AND ENVIRONMENTAL MANAGEMENT PROGRAMME AUDIT

Compliance Audit Report: November 2023

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Checked by	Matilda Mbazo	Matilda Mbazo		
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1 INTRODUCTION

1.1 TERMS OF REFERENCE

WSP Group Africa (Pty) Ltd (WSP) as an independent environmental consultant was appointed by Sasol South Africa Ltd (Sasol), to undertake an external environmental compliance audit of the commitments contained in the Environmental Authorisation (EA) (reference number: E/04/07) for the construction of two HCl storage tanks at Sasol Polymers and the commitments for the operational phase of the project contained in the Environmental Impact Assessment (EIA) (Scoping Report mitigation measures), 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 (initial Record of Decision (RoD)), its amendment and the commitments for the operational phase of the project contained in the Environmental Impact Assessment audited for compliance of the construction of two HCl storage tanks at Sasol Polymers at the Sasol One Site are provided below:

- EA for construction of two HCl storage tanks at Sasol Polymers in Sasolburg at the Sasol One Site (reference number: E/04/07), dated 16 August 2004 and issued to Sasol Polymers, by the then Department of Tourism, Environmental and Economic Affairs (now the Department of Economic, Small Business Development, Tourism and Environmental Affairs (DESTEA));
- The amendment of the EA for the construction of two HCl Storage Tanks (reference number: E/04/07), dated 28 November 2017 and issued to Sasol South Africa Ltd by the DESTEA. The amendments include:
 - Change of the brief description of the activity;
 - Change of location;
 - Change of the applicant's details on the EA;
 - Owner of the EA
 - Contact details and address
 - Change of the holder of the EA;
 - Management of EA and address
 - Changes of Specific Condition 6.
 - “Local Municipality disposal site” has been replaced with “licenced waste disposal facilities”.
- The amendment of the EA for the construction for the two HCl storage tanks, Sasolburg (reference number: E/04/07), dated 14 August 2020 and issued to Sasol South Africa Ltd by the DESTEA. The amendments include:
 - Change of the applicant's details on the EA;
 - Owner of the EA
 - Contact details and address
 - Change of the holder of the EA.

- Management of EA and address
- Scoping Report and EIR Mitigations.
- This external audit was undertaken in accordance with Regulation 34 of the Environmental Impact Assessment (EIA) Regulations, 2014 published in terms of the National Environmental Management Act 107 of 1998 (NEMA). This audit and report consider the period November 2019 to November 2023.

1.2 SASOL SASOLBURG – HCL STORAGE TANKS

The HCL storage tanks are found at a stand-alone plant from the rest of the Sasol One operations, and the main activity is to store Hydrochloric Acid (HCl). HCl is transported to the tanks by existing pipelines to the existing loading facilities where it will then be transferred to road tanker which distribute the product to individual clients as per normal procedures.

The tanks are lined with rubber and a bund wall is constructed around the tanks.

Operations run from 7am to 4pm and shutdown every evening. There are only two permanent personnel at the HCl plant.

1.3 PROJECT TEAM

Tshepho Mamashela and Matilda Mbazo completed a site inspection of the VMC Decanter against the EA conditions (reference: E/04/07) at the Sasol One on **31 October 2023**.

The draft external audit report was compiled in October 2023 and finalised in November 2023. The report will be submitted to the Department of Economic, Small Business Development, Tourism and Environmental Affairs (DESTEA) by Sasol in 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
Tshepho Mamashela	Auditor	BSc Hons Environmental Management
		6 Years' Experience
		Tshepho Mamashela is an Environmental Consultant currently working for WSP Group Africa at the Johannesburg, Waterfall office in the Environmental Planning and Advisory Department. She is an Environmental Management professional with over 5 years' experience in the private and public sector. Tshepho has experience in environmental management field with expertise in environmental impact assessment, environmental auditing, environmental management plans. She is registered with the Environmental Assessment Practitioners Association of South Africa (EAPASA: 2019/1846) and the South African Council for Natural Scientific Professions (SACNASP: 120878).
Matilda Mbazo	Auditor	BSc (Hons) Geography
		Matilda graduated from the University of Wits with a BSc honours in Geography in 2023 and is currently completing her Master's in

Audit Team	Role	Experience
		Environmental Science. She has over a year's experience in environmental management and currently provides technical and strategic input on a diverse range project in environmental management and environmental compliance audits. She is a registered Candidate Environmental Assessment Practitioner (EAP) with EAPASA (2023/6394).
Anri Scheepers	Review	<p>BA (Hons) Geography</p> <p>15 Years' Experience</p> <p>Anri graduated from the University of Johannesburg with a BA honours in Geography in 2007. Anri has been involved in numerous mining and industrial projects in South Africa, and has experience with diamond, gold, platinum, chrome, coal and manganese mining and processing operations. 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. Anri's roles and responsibilities include the management of Environmental Authorisation and Waste Management Licence processes (Basic Assessments and Scoping and Environmental Impact Assessment Reporting), Water Use Licence Application processes and auditing. She is registered with the Environmental Assessment Practitioners Association of South Africa (EAPASA: 2019/1528)</p>

2 AUDIT SCOPE

WSP was appointed by Sasol to conduct the environmental compliance audit for the conversion of the construction of two HCl storage tanks at Sasol Polymers, at the Sasol One site, Sasolburg. This report provides an overview of the level of compliance with the conditions contained in the EA and commitments for the operational phase of the project contained in the Environmental Impact Assessment as indicated in **Section 1.1**. The site audit was undertaken on 31 October 2023 at the Sasol One Site, Sasolburg Plant.

The objective of the audit was to:

- Assess the level of compliance with the commitments of the EA for the construction of the two HCl storage tanks at Sasol Midlands;
- Assess the level of compliance with the commitments of the impact mitigations that was submitted as part of the Scoping Report for the licensing of the two HCl storage tanks, as agreed and approved by DESTEA;
- Assess the extent to which the avoidance, management and mitigation measures provided for in the scoping report for the operation of the two storage tanks 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 scoping report impact mitigations; and
- Identify the need for any changes to the avoidance, management and mitigation measures provided for in the EA conditions and scoping report impact mitigation.

The EIA Regulations of 2014 (as amended) are considered applicable to the two HCl storage tanks operations. Regulation 34, of the EIA Regulations, provides for the auditing of an environmental authorisation, EMPr and closure plan. Furthermore, **Appendix 7** of Government Notice Regulation (GNR) 982 outlines the required audit report content. The 2014 Regulations, as amended, refer to a minimum audit frequency of five years. This audit is designed to meet the requirements of Regulation 34 of the EIA Regulations of 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 CV's 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

Sub-Section	Requirement	Report Section Reference
3(a)	The environmental audit report must determine (a) the ability of the EMPr, and where applicable the closure plan, to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an ongoing basis and to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility; and	Section 4
3(b)	The environmental audit report must determine the level of compliance with the provisions of environmental authorisation, EMPr and where applicable, the closure plan.	Section 4
4(a)	Where the findings of the environmental audit report indicate: (a) insufficient mitigation of environmental impacts associated with the undertaking of the activity (b) insufficient levels of compliance with the environmental authorisation or EMPr the holder must, when submitting the environmental audit report to the competent authority submit recommendations to amend 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
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

Sub-Section	Requirement	Report Section Reference
j	A summary and copies of any comments that were received during any consultation process.	Comments received during the consultation process were included as comments in the audit checklist tables in Section 4.
k	Any other information requested by the competent authority.	None requested

2.1 DISCLAIMER

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

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

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

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

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

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

2.2 ASSUMPTIONS AND LIMITATIONS

WSP noted the following assumptions and limitations during the audit:

- The information provided by Sasol is up to date and accurately represents the Sasol Sasolburg operations;



- WSP viewed as much of the operational area as possible given the timeframe and access limitations;
- Findings made within the previous audit reports are correct; and
- Site photographs were not provided in the audit report due to the onsite Sasol Sasolburg policy that disallows any photographs being taken on site. Where conditions were deemed compliant, and the evidence cited was onsite observations and verbal confirmation, these findings were 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 (**31 October 2023**);
- Review of documentation relevant to the commitments of the EA and Scoping report mitigations (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 scoping report impact mitigation commitments, which was used as an auditing compliance tool. Refer to **Table 4.1** and **Table Error! Reference source not found.** for the audit checklist.

3.2 SITE INSPECTION AND INTERVIEWS

An onsite inspection was conducted on **31 October 2023** where findings and observations were recorded and are summarised in **Section 4**. Key personnel interviewed during the audit included:

- Suyen Van Zyl; and
- Trevor Ekkerd.

3.3 INFORMATION CONSIDERED

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

- Notification: To install Safety Signs at Monomers Plan (Ref: 30645718) dated 29 March 2023;
- Application for Amendment of an Environmental Authorisation (Ref no: E/04/02) dated 18 August 2019;
- Air Emissions Licence (AEL) (reference number: FDDM-MET-2013-24-R1);
- Sasolburg and Ekandustria Operations Annual Emission Report (August 2022) to ensure compliance with the AEL conditions;
- Water Use Licence (WUL) (reference number: 14/C22K/FG/4958);
- Groundwater Quality Monitoring Report: WUL Compliance, Sasolburg Operations: February 2022 (WSP, May 2022);
- Integrated Water and Waste Management Plan (IWWMP) Rev 1 – report number: SO-env-1075 (Sasolburg Operations, December 2022) that includes the:
 - Stormwater Management Plan (SWMP, 2022);
 - 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.
- Storm Water management Plan Sasolburg Operations (File no: 27/2/2C222/6/4) (Sasolburg Operations, December 2021);
 - Sasolburg and Ekandustria Operations ISO 45001:2018, ISO 9001:2015 and ISO 14001:2015 Recertification Audit Report (DQS Management Systems Solutions, November 2021);
 - Procedure for the management of waste on the Sasolburg Operations' Sites (document number: SSP-S-014) (Sasolburg Operations, January 2020)
 - The reporting, investigation and recording of environmental incidents (document number: SSP-S-013) (Sasolburg Operations, July 2019);
 - Noise survey and impact assessment for hearing conservation purposes, Sasolburg Operations Wax, Solvents and Chemicals, Cresol, S4300 (Sasol Approved Inspection Authority for Occupational Hygiene, March 2021);
 - Waste Management and Disposal Registers;
 - Environmental Standards;
 - Health and Safety Standards and Audits;
 - Other related approvals documents.

3.4 ASSESSMENT EVALUATION METHODOLOGY

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

Table 3-1 Levels of Compliance

Compliance Level	Definition
Compliant (C)	When an activity or commitment has been implemented, completed, is on-schedule or is maintained on an ongoing basis. Condition/mitigation measure/commitment has been achieved with evidence provided in the form of a document or site verification.
Non-compliant (NC)	When an activity or commitment has not been complied with in its entirety/certain aspects thereof have not been addressed. 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:

	<ul style="list-style-type: none"> — Short term: 0 – 6 months. — Medium term: 6 – 12 months. — Long term: 12 - 18 months
<p>Not applicable (N/A)</p>	<p>The condition, commitment and/or mitigation measure is not applicable or is to be revised in accordance with current practice.</p> <p>A “Not Applicable” finding is also noted in event where such condition, commitment and/or mitigation measure is not yet relevant but is still relevant for future activities.</p>

4 AUDIT FINDINGS

4.1 ENVIRONMENTAL AUTHORISATION

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

Table 4-1 - Environmental Authorisation (reference: E/04/07 dated 16 August 2002) and Amendment (reference: E/04/07 dated 28 November 2017 and 16 August 2020) Audit Findings

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe & Responsible Person
EA – EM1/1(c)/00/127 (as amended)				
Specific Conditions				
	The authorisation has been granted solely for the purpose of undertaking the specific activity referred above.	C	<p>The activity taking place is operation of the two HCl storage tank.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Onsite observation Verbal Communication 	None.
2	The applicant of the HCl storage Tank facility must conform to the mitigation measures as compiled by A.M, Meyer (Environmental and Risk Engineer) (Point 7.2 of the Scoping Report: Environmental Impact Assessment of the HCl Storage Tank project) dated 05	C	<p>Mitigation measures of the scoping report are implemented and therefore audited for compliance.</p> <p><i>Evidence:</i></p>	None.

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe & Responsible Person
	<p>March 2004, to ensure that all precautionary measures are followed during the construction and operation of the facility,</p> <p>Specifically, to ensure good practice especially during the pre-constriction and construction phase, SASOL FMEA risk study should be conducted to ensure that the whole project adhere to safety procedures.</p>		<ul style="list-style-type: none"> Verbal Communication External audit of the construction of the two HCl storage tank (2018). 	
	<p>It is the responsibility of the applicant and the contractor on site to prevent any surface (stormwater) pollution.</p>	C	<p>The two HCl storage tanks are located within a concrete bund with a clean and contaminated stormwater management system and an emergency response control plan in place at the Sasol One site. The SSO has an onsite water management system to control clean stormwater, and a water treatment</p>	None.

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe & Responsible Person
			<p>management system to control and manage contaminated stormwater or effluent. Sasol One site is an industrial area and protocols were in place to ensure no effect and impact on the surface and groundwater.</p> <p>Additionally, the HCl tanks have a spill detector that notifies the Digital Control System (DCS) of sudden level drop. These are observed every 4 hours.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal confirmation Onsite observation DCS manifests. 	
4	In case of non-compliance with regulations the burden of proof rests with the applicant and/or the relevant contractor.	N/A	The Holder of the Authorisation and External Auditor	None.

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe & Responsible Person
			noted this condition.	
5	The department hereby confirms that an audit of compliance with procedures mentioned in 2 and 3 above can be conducted at any time	C	<p>Sasol conducts external performance audit according to regulation 34 of the EIA Regulations for the operation phase of the HCl.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Communication External audit of the construction of the two HCl storage tank (2018). 	None.
6	All packaging material, domestic waste and other non-hazardous waste must be disposed of at the local Municipality disposal site licenced waste disposal facility	N/A	There is no packaging material, domestic waste and other non-hazardous waste produced by the operation of the two HCl storage tanks.	None.
General Conditions				

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe & Responsible Person
	This authorisation is granted in terms of Section 28A of the Environmental Conservation Act, 1989 (Act No.73 of 1989) and does not exempt the holder from compliance with other relevant Legislation.	C	<p>Sasol Midland site enforces other requirements from other authorities on site.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> ■ Onsite observation ■ Verbal communication ■ AEL ■ WUL 	None.
	The applicant must advertise this Record of Decision to notify interested and affected parties of this authorisation and their right to appeal against the ROD, within 30 days from the approval date of the ROD	N/A	Noted. This condition is outside the audit period and refers to a requirement prior to commencement and was therefore not audited.	None.
	The authorised activity, including site preparation, may not commence before the statutory 30-day appeal period expires. The 30-days appeal period starts from the date of the advertising of the ROD.	N/A	Noted. This condition is outside the audit period and refers to a requirement prior to commencement and was therefore not audited.	None.

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe & Responsible Person
	<p>This authorisation refers only to the project specified and described in this ROD.</p> <p>a. Changes in the proposal resulting in significant environmental impacts are only permissible if approved in writing by the Department.</p> <p>The Department reserves the right to amend and review the conditions of the authorisations every 5 years.</p>	N/A	Noted. No changes in the authorised activity have taken place.	None.
	<p>The Department must be notified, within 30 days thereof, of any changes of ownership and/or project developer. Conditions imposed in this ROD must be made known to the new owner and/or developer and are binding to the new owner and/or developer.</p>	C	<p>The Department has been notified of any changes of the contact person of the authorisation through the amendment process. The contact person is aware of the EA conditions.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Communication Amendment to the EA (28 	None.

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe & Responsible Person
			<p>November 2017)</p> <ul style="list-style-type: none"> Amendment to the EA (16 August 2020) 	
	The Department must be notified if any changes of address of the owner and/or developer.	C	<p>The Department has been notified of any changes of the contact person of the authorisation through the amendment process. The contact person is aware of the EA conditions.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Communication Amendment to the EA (28 November 2017) Amendment to the EA (16 August 2020) 	None.
	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	C	<p>Conditions of the EA are displayed in some areas onsite for personnel to read.</p>	None.

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe & Responsible Person
	bind such persons to these conditions.		EA training for personnel also takes place. <i>Evidence:</i> <ul style="list-style-type: none">■ Verbal Communication■ Onsite observation of the displayed EA conditions	
	The owner and/or developer must notify the relevant authority, in writing, within 24 hours thereof if any condition of this authorisation is not adhered to.	C	Sasol conducts internal and external performance audit according to regulation 34 of the EIA Regulations for the operation phase of the HCI. The audit reports are submitted to the Department. <i>Evidence:</i> <ul style="list-style-type: none">■ Verbal Communication■ External audit of the construction of the two HCI	None.

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe & Responsible Person
			storage tank (2018).	
	Proof of compliance with the conditions described in the ROD must be forwarded to the Department one week prior to the commencement of construction or operation of the development (as appropriate).	C	<p>Sasol conducts external performance audit according to regulation 34 of the EIA Regulations for the operation phase of the HCI. The audit reports are submitted to the Department.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Communication External audit of the construction of the two HCI storage tank (2018). 	None.
	Records related to compliance/noncompliance 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	C	Sasol conducts external performance audit according to regulation 34 of the EIA Regulations for the operation phase of	None.

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe & Responsible Person
	date of written request from the Department.		<p>the HCI. The audit reports are submitted to the Department.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Communication External audit of the construction of the two HCI storage tank (2018). 	
	Non-compliance with or deviation from the conditions of this authorisation as set out in the ROD is regarded as an offence, and after reasonable provisions has been given for remedial action, will be dealt with in terms of Section 29, 30 and 31A of the Environmental Conservation Act (Act No.73 of 1989) as well as any other appropriate legal mechanism.	N/A	The Holder of the Authorisation and External Auditor noted this condition.	None.
	The applicant shall be responsible for all cost necessary to comply with the above conditions unless otherwise specified.	N/A	The Holder of the Authorisation and External Auditor noted this condition.	None.

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe & Responsible Person
	Provincial Government, Local Authority, or committees appointed in terms of the conditions of the application or any other public authority or organisation shall not be held responsible for any damages or losses suffered by the developer or his successor in title in any instance where construction or operation subsequent to construction be temporarily or permanently stopped for reasons of non-compliance by the developer with the conditions of approval as set out in this document or any other subsequent document emanating from these conditions of approval.	N/A	The Holder of the Authorisation and External Auditor noted this condition.	None.
Key factor for the decision				
	The department's authorisation is based upon a review of the Environmental Impact Assessment Scoping Report dated 05 May 2004. The scoping report concludes that provided the applicant implements the mitigation measures and recommendations as outlined and contained in the report, the proposed development will have	N/A	The Holder of the Authorisation and External Auditor noted this condition.	None.

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe & Responsible Person
	a negligible impact on the natural environment.			
	The environmental impact assessment complies with the requirements of the EIA regulations. Information submitted is deemed to be sufficient and adequate to make an informed decision.	N/A	The Holder of the Authorisation and External Auditor noted this condition.	None.
	Negative environmental impacts associated with the project can be sufficiently mitigated, provided the conditions in this ROD are implemented and adhered to.	C	<p>Mitigation measures of the scoping report are implemented and therefore audited for compliance.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Communication External audit of the construction of the two HCl storage tank (2018). 	None.
Duration and date of expiry				
	This authorisation shall lapse if the activity does not commence within two years of the date of the issue of this authorisation.	N/A	Noted. This condition is outside the audit period and refers to a requirement prior	None.

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe & Responsible Person
			to commencement and was therefore not audited. The facility was operational.	
Appeal				
	<p>Section 35(3) of the Environment Conservation Act, 1989 (Act No. 73 of 1989), makes provision for appeal by any person who feels aggravated by a decision made by a relevant authority in terms of these regulations. "Any person", therefore included the applicant, interested party or member of the public.</p> <p>Appeal to the MEC (Department of Tourism, Environmental and Economic Affairs) under section 35 (3) of the Environment Conservation Act, 1989 (Act No. 73 of 1989) must be done in writing within 30 days from the date in which the ROD was issued to the applicant in terms of regulation 10 (1) should be directed to:</p>	N/A	Noted. This condition is outside the audit period and refers to a requirement prior to commencement and was therefore not audited. The facility was operational.	None.



Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe & Responsible Person
	The MEC: Department of Environmental Affairs and Tourism Free State Province P.O. Box 264 Bloemfontein 9300			



4.2 SCOPING REPORT MITIGATIONS

Table 4-2 below provides the compliance of Sasol with the mitigation of the Scoping Report for the construction of two HCl storage tanks at the Sasol Polymers, dated April 2004.

Table 4-2 – Scoping Report Mitigation Audit Findings

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
Air Quality								
	The tanks will be equipped with scrubber system to absorb any fumes. Existing procedures will be followed to fill the tankers to prevent fumes from escaping.	C	The tanks on site are equipped with scrubber systems that act as fume absorbers. <i>Evidence:</i> ■ Onsite observation	None	N/A	N/A	N/A	N/A
Surface Water								
	During commissioning, the new equipment will be flushed, and pressure tested with water. This does not pose any threat to the environment, since the new equipment is not exposed to any contaminants at this stage. Since no contamination can occur, thus	C	The HCl tanks are located within a concrete bund with a clean and contaminated stormwater management system and an emergency response control plan in place at the Sasol Midland site. The Midland site has an onsite	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>water will go to the existing storm water sewers.</p> <p>The area around the tanks will be bunded and fitted with a sump to contain any spillages that can cause contamination.</p>		<p>water management system to control clean stormwater, and a water treatment management system to control and manage contaminated stormwater or effluent. Sasol Midland site is an industrial area and protocols were in place to ensure no effect and impact on the surface and groundwater, or vegetation.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation Onsite observation 					
Ground water								
	<p>During commissioning, the new equipment will be flushed, and pressure tested with water. This does not pose any threat to the environment, since the new equipment is not exposed to any contaminants at this stage. Since no contamination can occur, thus water will go to the existing storm water sewers.</p>	C	<p>The area around the HCl storage tanks is located on concrete with functional stormwater drains that direct any storm water to plant reservoir.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Onsite observation Verbal communication 	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 area around the tanks will be bunded and fitted with a sump to contain any spillages that can cause contamination.							
Liquid effluent								
	No effluent is generated since the project entails a storage and distribution facility. During shutdown the remaining product will be routed to clients or other tanks and no disposal of any product will therefore be required.	C	<p>The facility is for storage and distribution of HCl. As a result, no liquid effluent is produced.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Onsite observation Verbal communication 	None.	N/A	N/A	N/A	N/A
	The scrubber system will generate small volumes of effluent. This will be routed to nearby tanks for recycling. Contaminated rainwater from the bunds will be collected and manually transported to the Chlorine plant where it will be handled by the existing effluent handling system.	C	<p>The Midland site has an onsite water management system to control clean stormwater, and a water treatment management system to control and manage contaminated stormwater or effluent. Sasol Midland site is an industrial area and protocols were in place to ensure no effect and impact on the surface and groundwater, or vegetation.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation 	None.	N/A	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			<ul style="list-style-type: none"> Onsite observation 					
Solid effluent								
	Waste generated from the construction process will be disposed of at recognised sites. All packaging material, domestic and other non-hazardous waste will be disposed of at the Metsimaholo Municipal disposal site.	N/A	No solid waste is generated by the operation of the two HCl tanks. Therefore, this condition is outside the audit period and refers to a requirement during the construction phase and not the operational phase, therefore it was not audited.	None.	N/A	N/A	N/A	N/A
Land and soil								
	The development will take place at the Sasol Midland site, on an industrial area. Excavation will be required for the construction of the bund wall. Excavated soil will be re-used for backfilling as far as possible. Otherwise, it will be disposed at a recognised disposal site	N/A	This condition is outside the audit period and refers to a requirement during the construction phase and not the operational phase, therefore it was not audited.	None.	N/A	N/A	N/A	N/A
Fauna and Flora								
	There will be no significant effect on the biological environment as the proposed project is within an existing industrial site.	C	The two HCl storage tanks were constructed within an industrial area. No vegetation	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)
			is impacted by the operation of the tanks. <i>Evidence:</i> ■ Onsite observation.					
Visual								
	The facility is existing and there will not be any visual impact as a result of this project.	C	The two HCl storage tanks were constructed within an industrial area. No visual impacts occurred by the operation of the tanks. <i>Evidence:</i> ■ Onsite observation.	None.	N/A	N/A	N/A	N/A
Noise								
	Construction activities are usually for a certain period characterised with limited noise pollution. This will however be limited to the construction sites.	N/A	This condition is outside the audit period and refers to a requirement during the construction phase and not the operational phase, therefore it was not audited.	None.	N/A	N/A	N/A	N/A
Socio-economic								
	During the construction phase approximately 30 additional labourers will be required.	N/A	This condition is outside the audit period and refers to a requirement during the	None.	N/A	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
			construction phase and not the operational phase, therefore it was not audited.					
Health, Safety and risk								
	An internal Sasol risks study namely Failure Mode Effect Analysis (FMEA) will be conducted on the proposed project. Safety procedures are developed to cancel or ameliorate the effect of equipment malfunction/operation error.	C	<p>Sasol Midland has HAZOP (Hazard and operability and FMEA (Failure Mode Effect Analysis) procedures, which 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 mode of operation are assessed.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation 	None.	N/A	N/A	N/A	N/A
	During construction phase, strict rules will apply for welding/grinding. All contractors working on the site will undergo safety training as per Sasol existing procedure. Each contracting company would have a safety representative who will undertake regular inspection of	N/A	This condition is outside the audit period and refers to a requirement during the construction phase and not the operational phase, therefore it was not audited.	None.	N/A	N/A	N/A	N/A

Ref	Condition	Compliance Status	Findings	Recommendation, Timeframe and Responsible Person	Measures Implemented to Address Non-Compliance	Practicality of the EMPR Commitments	Is the Non-Compliance Administrative or will it have an impact	Historical/New Non-Compliance (Administrative measures)
	the workplace to enforce the wearing of protective clothing and to ensure compliance with the relevant safety rules. All contractors and employees would furthermore be made aware of the existing emergency procedures and responsibilities where applicable.							
	All workers will be trained and will undergo safety training prior to commencing work at the facility.	C	<p>Sasol has safety protocols in place for employees and any entering the site. Protective clothes and equipment are required.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation Onsite observation 	None.	N/A	N/A	N/A	N/A

5 PROGRESS AGAINST PREVIOUS AUDIT FINDINGS

The previous compliance audit report against the consolidated EA and Scoping Report Mitigations was compiled by the Northwest University CEM in November 2018. A comparison in the change of compliance rating from the 2018 and 2023 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 (2018 and 2023). The 2018 and 2023 audit identified zero non-compliant conditions.

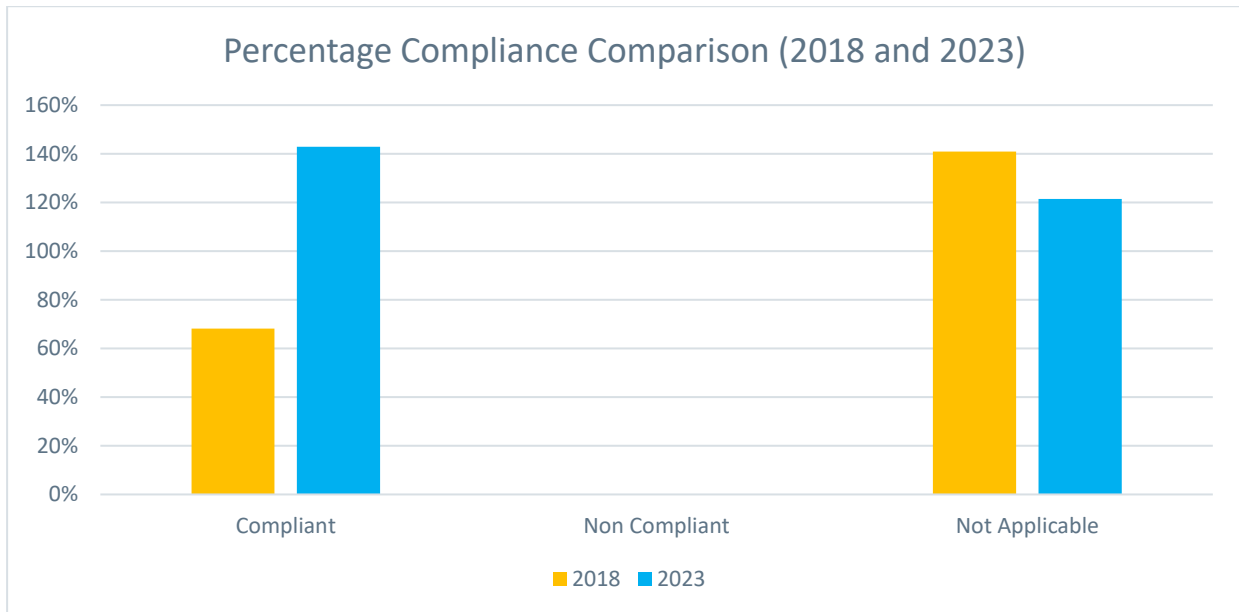


Figure 5-1 – Percentage comparison of compliance levels from 2018 to 2023

Table 5-1 – Progress against previous findings

Ref	Commitment	2018 Status	2018 Finding	2023 Status	2023 Finding
EA Conditions					
1. Specific Conditions					
1.	The authorisation has been granted solely for the purpose of undertaking the specific activity referred above.	N/A	Not relevant for the operational phase.	C	The activity taking place is operation of the two HCl storage tank. <i>Evidence:</i> <ul style="list-style-type: none"> Onsite observation Verbal Communication.
2.	The applicant of the HCl storage Tank facility must conform to the mitigation	N/A	Not relevant for the operational phase.	C	Mitigation measures of the scoping report are

Ref	Commitment	2018 Status	2018 Finding	2023 Status	2023 Finding
	measures as compiled by A.M, Meyer (Environmental and Risk Engineer) (Point 7.2 of the Scoping Report: Environmental Impact Assessment of the HCl Storage Tank project) dated 05 March 2004, to ensure that all precautionary measures are followed during the construction and operation of the facility, Specifically, to ensure good practice especially during the pre-construction and construction phase, SASOL FMEA risk study should be conducted to ensure that the whole project adhere to safety procedures.				implemented and therefore audited for compliance. <i>Evidence:</i> <ul style="list-style-type: none"> Verbal Communication External audit of the construction of the two HCl storage tank (2018).
3.	The department hereby confirms that an audit of compliance with procedures mentioned in 2 and 3 above can be conducted at any time	N/A	Not relevant for the operational phase.	C	Sasol conducts external audits to measure their level of compliance with the EA conditions according to regulation 34 of the EIA Regulations. The audit reports are submitted to the relevant competent authority. <i>Evidence:</i> <ul style="list-style-type: none"> Verbal Communication External audit of the construction of the two HCl storage tank (2018).
General Conditions					
7.	This authorisation is granted in terms of Section 28A of the Environmental Conservation Act, 1989 (Act No.73 of 1989) and does not exempt the holder from compliance with other relevant Legislation.	N/A	Not relevant for the operational phase.	C	Sasol Midland site enforces other requirements from other authorities on site. <i>Evidence:</i> <ul style="list-style-type: none"> Onsite observation Verbal communication AEL WUL
Key factors for the decision					

Ref	Commitment	2018 Status	2018 Finding	2023 Status	2023 Finding
	Negative environmental impacts associated with the project can be sufficiently mitigated, provided the conditions in this ROD are implemented and adhered to.	N/A	Not relevant for the operational phase.	C	<p>Mitigation measures of the scoping report are implemented and therefore audited for compliance.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Communication External audit of the construction of the two HCl storage tank (2018).
Scoping Report Mitigations					
Solid effluent					
	Waste generated from the construction process will be disposed of at recognised sites. All packaging material, domestic and other non-hazardous waste will be disposed of at the Metsimaholo Municipal disposal site.	C	Domestic waste is managed in terms of the Sasol Sasolburg Operations Sote SSP-S-014 dated 2016/12/01. Sasol Midland uses Interwaste to collect domestic.	N/A	No solid waste is generated by the operation of the two HCl tanks. Therefore, this condition is outside the audit period and refers to a requirement during the construction phase and not the operational phase, therefore it was not audited.
Fauna and Flora					
	There will be no significant effect on the biological environment as the proposed project is within an existing industrial site.	N/A	Not relevant for the operational phase.	C	<p>The two HCl storage tanks were constructed within an industrial area. No vegetation is impacted by the operation of the tanks.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Onsite observation.
Health, Safety and Risk					
	An internal SASOL's risk study, namely FMEA (Failure Mode Effect Analysis) will be conducted on the proposed project. This is a study where the whole project and all the equipment involved is reviewed in detail by the engineering design and operation team, and potential failures or departures in the normal mode of operation are assessed. Safety	N/A	Not relevant for the operational phase.	C	<p>Sasol Midland has HAZOP (Hazard and operability and FMEA (Failure Mode Effect Analysis) procedures, which 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 mode of operation are assessed.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation

Ref	Commitment	2018 Status	2018 Finding	2023 Status	2023 Finding
	procedures are developed to cancel or ameliorate the effects of such equipment malfunctions / operator error(s).				
	All workers will be trained and will undergo safety training prior to commencing work at the facility.	N/A	Not auditable.	C	<p>Sasol has safety protocols in place for employees and any entering the site. Protective clothes and equipment are required.</p> <p><i>Evidence:</i></p> <ul style="list-style-type: none"> Verbal Confirmation Onsite observation

6 SUMMARY OF THE AUDIT FINDINGS

6.1 SASOL SASOLBURG TWO HCL STORAGE TANKS 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
Specific conditions	6	4	0	2
General conditions	13	7	0	6
Key factors for the decision	2	0	0	2
Duration and date of expiry	1	0	0	1
Appeal	1	0	0	1
Total	23	12	0	11
Total Percentage		52%	0%	48%
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.

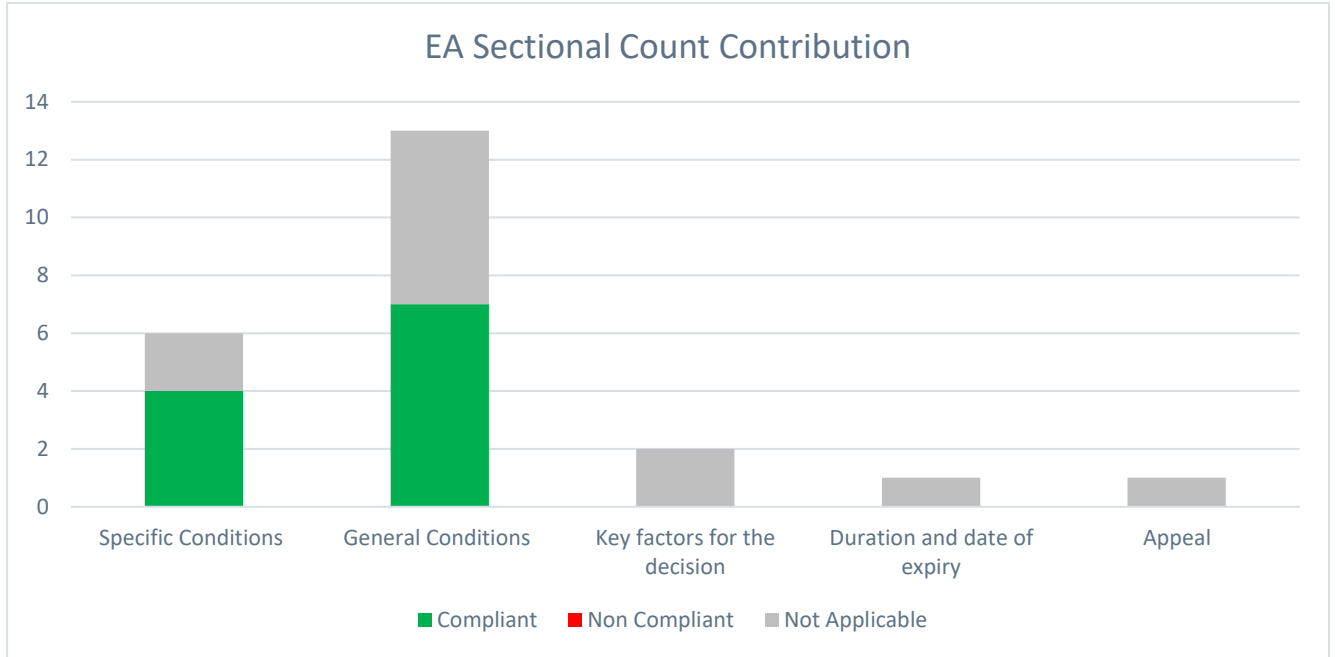


Figure 6-1 - Number/Count contribution of findings made to the EA conditions per section

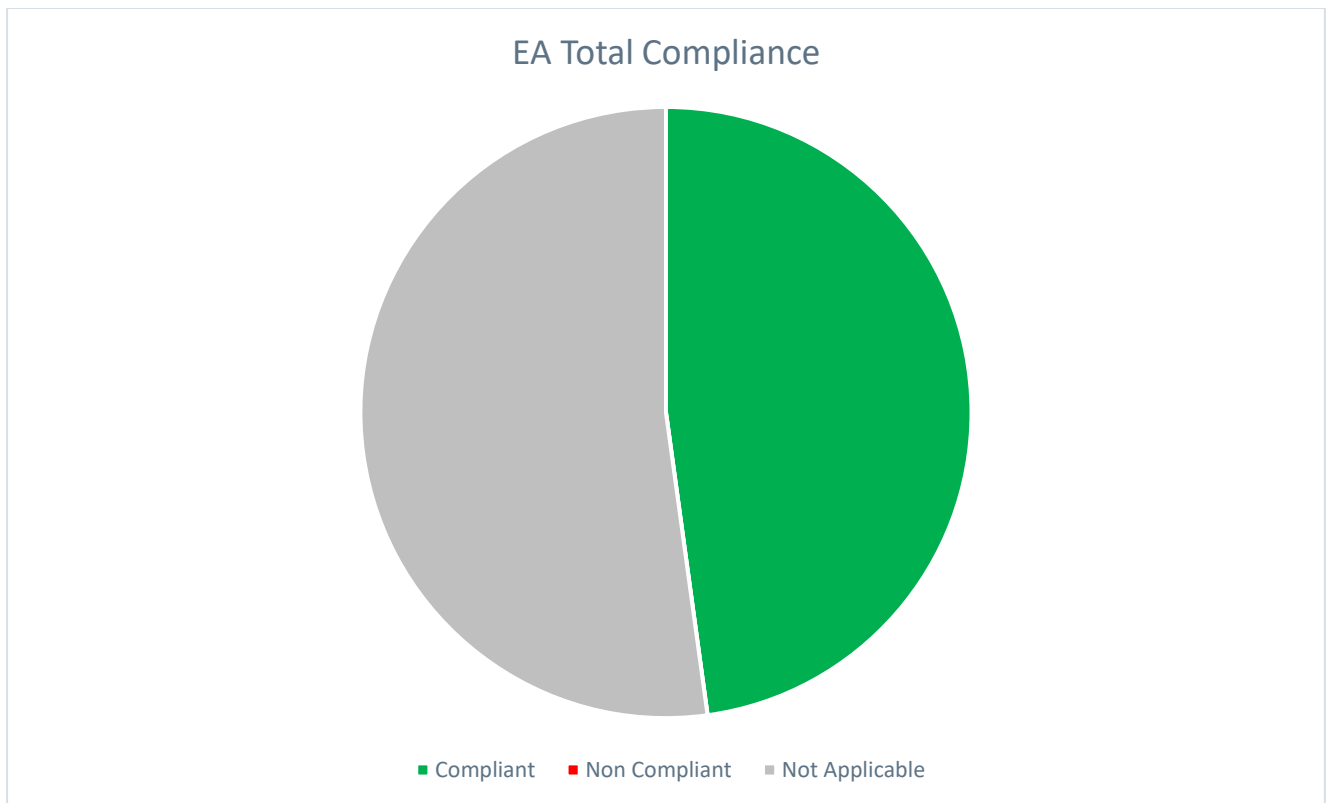


Figure 6-2 - Overall count findings on compliance to the EA commitments

6.2 SASOL SASOLBURG TWO HCL STORAGE TANKS SCOPING REPORT MITIGATION 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 scoping report mitigations are listed in **Table 6-2** below.

Table 6-2 - Summary of Scoping Report Mitigation Compliance Audit Findings

Section of the EMP	No. Commitments	C	NC	N/A
Air quality	1	1	0	0
Surface Water	1	1	0	0
Groundwater	1	1	0	0
Liquid effluent	2	2	0	0
Solid effluent	1	0	0	1
Land and soil	1	0	0	1
Flora and Fauna	1	1	0	0
Visual	1	1	0	0
Noise	1	0	0	1
Socio-economic	1	0	0	1
Safety and risk	3	2	0	1
Total	14	8	0	6
Total Percentage		57%	0%	43%
Percentage Compliance with Applicable Conditions	100%			

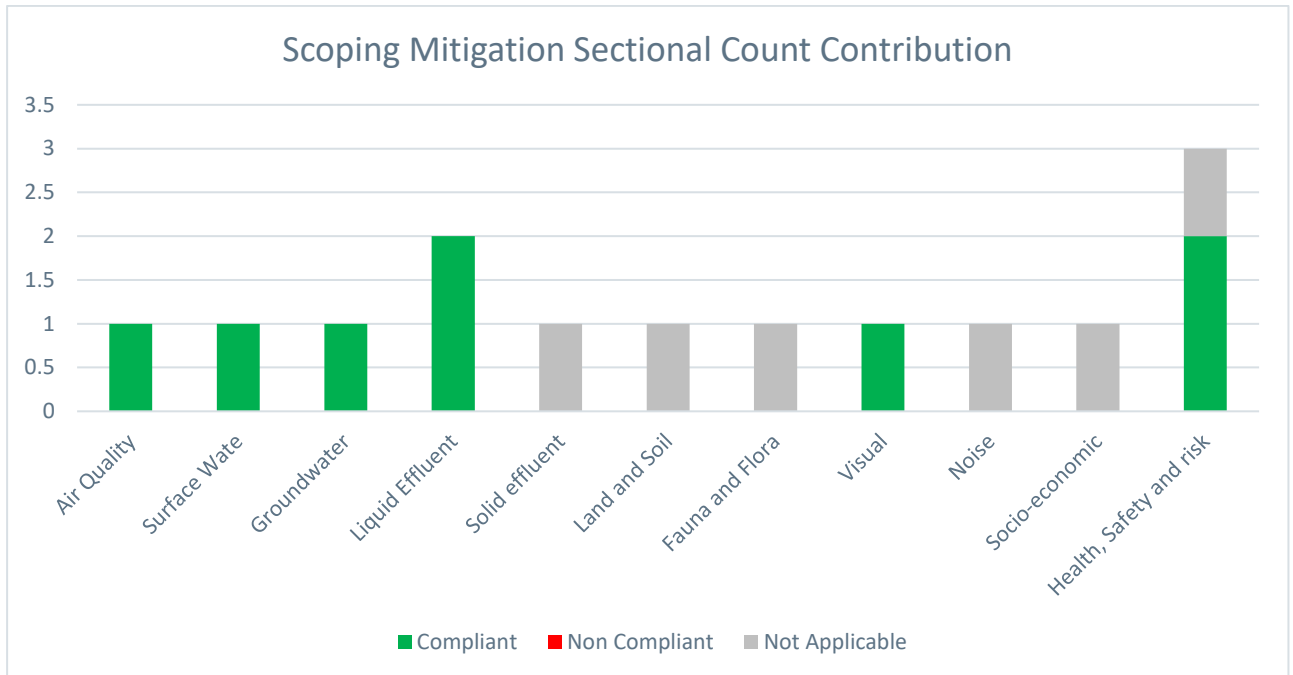


Figure 6-3 - Number/Count contribution of findings made to the Scoping report mitigation Commitments per Section

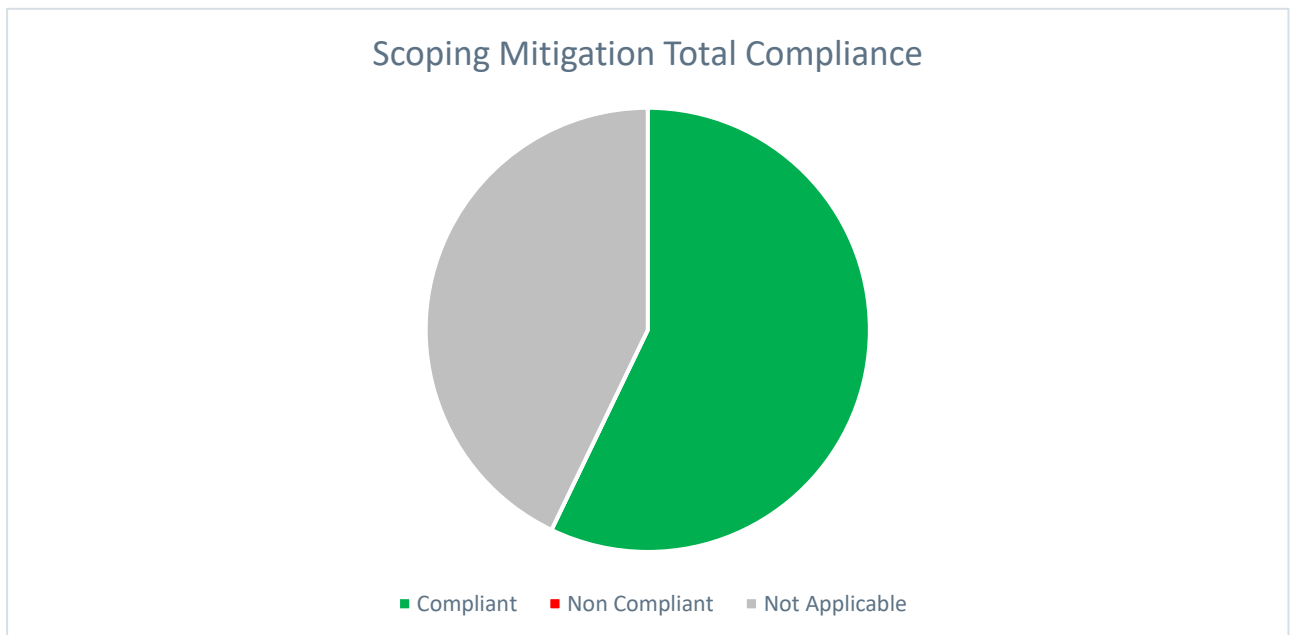


Figure 6-4 - Overall count findings on compliance to the Scoping Report Mitigation Commitments

7 RECOMMENDATIONS

Zero non-compliances of the EA and scoping report mitigations was noted during the audit. Sasol is commended for achieving 100% compliance for the EA and scoping report mitigation audit and is urged to continue to implement the environmental mitigation measures within the EA and Scoping report. In addition, Sasol should continue to implement their EMS for their onsite operations and to identify new environmental risks due to changes in operations, and address these when identified on site.

Sasol is advised to continue with their 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 CONCLUSION

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

- Assess the level of compliance with the conditions of the EA.

The EA compliance audit has identified that the EA commitments remain applicable, and the EA is considered effective. As such, WSP does not recommend any amendment of the EA as it is sufficient in managing environmental impacts.

WSP do acknowledge that Sasol has systems in place which are considered to be more robust for monitoring compliance and implementing changes than through the EA audit; this includes the annual audit of each business unit to meeting the ISO 14001 standards. New impacts and risks are continually identified and assessed by Sasol's Environmental Department, which assesses environmental risks and drives improvement implementation. This Department facilitates Environmental Risk Assessments per business unit to ensure that gaps are addressed through implementation of mitigation measures via an Integrated Management System.

In conclusion, WSP recommends that Sasol continues to operate each business unit under an Environmental Management System and meet the licence compliance conditions (EA, EMP, WUL, AEL, etc). This is effective for mitigation against any gaps in the EMP and to regularly identify new environmental impacts and risks that should be addressed on site.

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: _____Tshepho Mamashela_____

UNDERTAKING

I, _____Tshepho Mamashela_____, the undersigned and duly authorized thereto, by WSP, have studied Two Sasol HCl Storage Tanks and compared the operations to the approved Scoping Report Mitigations and compiled this report to the best of my knowledge. This section should be read with **Section 2**.

Signed at _____Midrand_____ on this the _____January_____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.

Appendix A

AUDITOR CVS





Matilda Mbazo

Earth and Environment, Environmental Planning & Advisory, Intern

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 an Intern in the Environmental Planning and Advisory Division of WSP Group Africa based in the Waterfall office. Matilda has less than a year 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.



1 < 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 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

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 to October 2023

Environmental Auditor



At the Sasol One Complex in Sasolburg, nine unit 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

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.



Tshepho Mamashela

Earth & Environment - Environmental Consultant

CAREER SUMMARY

Tshepho Mamashela is an Environmental Consultant currently working for WSP Group Africa at the Johannesburg, Waterfall office in the Environmental Planning and Advisory Department. She is an Environmental Management professional with over 5 years' experience in the private and public sector. Tshepho has experience in environmental management field with expertise in environmental impact assessment, environmental auditing, environmental management plans.



<1 years with WSP

6 years of experience

Area of expertise

Environmental Management
Environmental Impact Assessment
Compliance Auditing

Language

English

EDUCATION

Bachelor of Science (Honours), Environmental Management, University of South Africa	2019
Bachelor of Science, Geography, University of Pretoria	2017

ADDITIONAL TRAINING

Esri ArcGIS Basic	2019
Esri ArcGIS Standard	2019

PROFESSIONAL MEMBERSHIPS

EAPASA – Environmental Assessment Practitioner Association of South Africa- Registration No. 2019/18	2019
	2022
SACNASP – South African Council for Natural Scientific Professional - Certified Natural Scientist – Registration No. 120878	2021

PROFESSIONAL HISTORY

WSP Group Africa (Pty) Ltd	2023 - present
Mills and Otten	2023 – 2023
Environmental Consultant International	2021 -2022
Esri South Africa	2019 -2020
Limpopo Department of Economic Development Environment and Tourism	2018 -2019



Tshepho Mamashela

Earth & Environment - Environmental Consultant

Mabyoko Environmental Projects

2017 -2018

PROFESSIONAL EXPERIENCE

Environmental Impact Assessment Process

McCormick Property Development, Development of a New Shopping Centre, Motor City, Private Hospital and Housing in Dan Limpopo Province, South Africa

2023

EAP

Compile the Scoping Report and the Environmental Impact Report.

Cubisol Investments, Replacement of an existing sewer pipeline BA Gauteng Province, South Africa

2023

EAP

Compile the BA report and conduct public participation.

L Gromer, Expansion of egg processing facility, North West, South Africa

2023

EAP

Compile the BA.

Engen Petroleum, Upgrade and Expansion of the Engen Impala Filling Station, Limpopo, South Africa

2023

EAP

Compile the BA report, application forms and conduct public participation.

African Realty Trust, Construction of six in-stream storage dams at Letaba Estate, Limpopo, South Africa

2022

EAP

Assisted with compiling scoping report, application and related public participation documents.

Garonga Safari Camp, S24G Application for Garonga Safari Camp, Limpopo, South Africa

2021/2022

EAP

Assisted with compiling scoping report, application and related public participation documents.

McCormick Property Developers, Development of shopping centre and filling station at Madombizha, Limpopo Province, South Africa

2018/2019

Case officer

Review the BA for decision making process.

KHPJ Property Developers, Mixed-use development at Tiyani-B, Limpopo Province, South Africa

2018

Case Officer

Review the Scoping Report and Environmental Impact Report for decision making process.

Thulamela Local Municipality, Demarcation of 500 sites at Maphefeni, Limpopo Province, South Africa
Year from/to

2018

Review the Scoping Report and Environmental Impact Report for decision making process.



Tshepho Mamashela

Earth & Environment - Environmental Consultant

L. P Mogobobye Hydraulics, Filling station at Sifikile Village, Bojanala, North West Province, South Africa

2017/2018

EAP

Assisted in compiling the BA and supporting documentation including application forms and public participation material.

Compliance Auditing

Total Energies, Filling Moutse Mall Filling Station, Limpopo Province, South Africa

2023

Environmental Control Officer

Provided Environmental Control Officer (ECO) services by conducting monthly EMPr and EA audit for the construction of the filling station.

Sasol, Sasol Ammonia Storage Facility Upgrade, Free State Province, South Africa

2023

Environmental Control Officer

Provided Environmental Control Officer (ECO) services by conducting monthly EMPr and EA audit for the construction of the ammonia storage facility.

Cubusol Investment, Soshanguve Mall Upgrade, Gauteng Province, South Africa

2023

Environmental Control Officer

Provided Environmental Control Officer (ECO) services by conducting monthly EMPr and EA audit for the construction of the mall.

Alley Road, Residential Construction at Meyerton, Gauteng Province, South Africa

2023

Environmental Control Officer

Provided Environmental Control Officer (ECO) services by conducting monthly EMPr and EA audit for the construction of the residential complex.

Lynx Construction Group, Thatchfield Mall Construction, Gauteng, South Africa

2023

Environmental Control Officer

Provided Environmental Control Officer (ECO) services by conducting monthly EMPr and EA audit for the construction of the mall.

Emfuleni Estate Homeowners Association, Annual Water Use License Compliance, Free State Province, South Africa

2023

Environmental Control Officer

Provided Environmental Control Officer (ECO) services by conducting annual WUL audit.

Engen Petroleum, Annual Compliance Audit for Gauteng Site, Gauteng Province, South Africa

2023

Environmental Control Officer

Provided Environmental Control Officer (ECO) services by conducting monthly EMPr and EA audit for the operation of the filling stations. The following filling station were audited:

- Engen Hazeldene Convenience
- Engen Vega Service Station
- Engen Silver Lakes Convenience



Tshepho Mamashela

Earth & Environment - Environmental Consultant

- Engen R511 Tanganani
- Engen Wierda Park Motors
- Engen Lombardy Convenience Centre
- Engen Country View Service



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Annexure B – Construction of two HCl storage tanks - E/04/07

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 Outcome
1.Land and Soil The development will take place on the Sasol Midland site, on an industrial area.	1.1 The area around the tanks will be bunded and fitted with a sump to contain any spillages that may cause contamination.
2.Surface water and ground water The area around the tanks will be bunded and fitted with a sump to contain any spillages that may cause contamination. The project will therefore have no negative effect on the surface and ground water quality	2.1 The area around the tanks will be: - bunded and - fitted with a sump to contain any spillage that may cause contamination
3. Air quality Existing procedures will be followed to fill the tanks to prevent fumes from escaping.	3.1 The tanks will be equipped with a scrubber system to absorb any fumes
	3.2 Existing procedures will be followed to fill the tanks to prevent fumes from escaping.
4. Liquid effluent Since this project entails a storage and distribution facility no effluent will be generated during normal operation of this activity	4.1 Liquid effluent: i) During shutdowns the remaining product will be routed to: - clients - or other tanks - and no disposal of any product will therefore be required
	4.2 The scrubber system will generate small volumes of effluent. This will be routed to nearby tanks for recycling
	4.3 Contaminated rainwater from the bunds will be collected and manually transported to the Chlorine plant where it will be handled by the existing effluent handling system.