



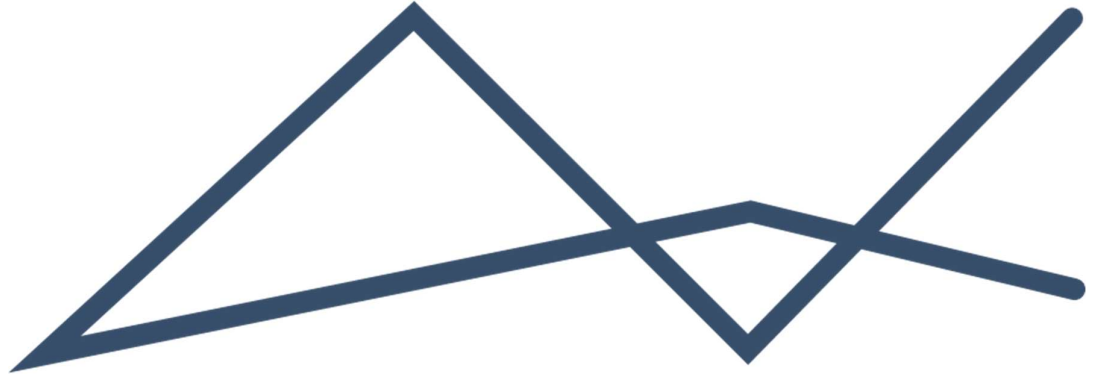
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ENVIRONMENTAL AUDIT REPORT

PETROSA OFFSHORE PRODUCTION RIGHT: BLOCK 9 – FA EM
PRODUCTION AREA





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List of Abbreviations

Abbreviation	Item
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EIMS	Environmental Impact Management Services (Pty) Ltd
EMPr	Environmental Management Programme Report
HSE	Health, Safety, and Environment
I&AP	Interested and Affected Party
MPRDA	Mineral and Petroleum Resources Development Act, Act 28 of 2002
NEMA	National Environmental Management Act, Act 107 of 1998
OSCP	Oil Spill Contingency Plan
PASA	Petroleum Agency of South Africa
PetroSA	Petroleum Oil and Gas Corporation of South Africa (Pty) Ltd
ROV	Remote Operated Vehicle
SANHO	South African Hydrographic Office
SAMSA	South African Maritime Safety Authority



EXECUTIVE SUMMARY

Environmental Impact Management Services (Pty) Ltd (EIMS) was appointed by the Petroleum Oil and Gas Corporation of South Africa SOC LTD (hereafter referred to as PetroSA) to undertake an Environmental Audit of the Record of Decision (RoD¹) and Environmental Management Programme (EMPr) for the FA-EM Production Operations in Block 9 off the South Coast of South Africa.

PetroSA's Block 9 licence area covers a surface area of 22,756km² and presently includes four production lease areas: FA-EM; South Coast Gas (SCG), FO-EM (Sable) and Oribi/Oryx. Each of these areas has its own EA (or RoD) and associated EMPr. **This audit report is relevant to the FA-EM Production Area and associated RoD and EMPr** (PASA ref: 12/4/1/05/2/2/2).

The FA gas field was discovered in 1980, and the Platform and associated Gas to Liquid (GTL) refinery were commissioned in 1992. The FA Satellite gas fields were commissioned in 1997 to feed gas to the FA platform. The EM gas field was commissioned in 2001 to supply gas to the FA platform. The FA-EM production area is currently operated in accordance with the 2010 EMPr prepared by Lwandle Technologies (Lwandle Technologies (Pty) Ltd, 2010).

Regulation 54(a)(2) of the Environmental Impact Assessment (EIA) Regulations (GNR982- EIA Regulations) requires all rights and permits issued in terms of the Mineral and Petroleum Resources Development Act, Act 28 of 2002 (MPRDA) and associated Environmental Management Plans to be subjected to the audit requirements stipulated in Part 3 of Chapter 5 of the Regulations. Part 3, Chapter 5 of the EIA Regulations in turn requires that compliance with the conditions of the EA, and the EMPr is audited and an environmental audit report be submitted to the relevant competent authority.

The period of assessment for this audit is June 2015 – June 2025. The scope of the audit is to assess compliance with the requirements of the RoD and EMPr for the FA-EM Production area currently held by PetroSA, and to confirm the continued adequacy of the EMPr. The purpose of the audit is to determine and report on:

- The level of performance against and compliance of the conditions with the provisions of the requisite approved EMPr; and
- The ability of the measures contained in the EMPr, to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the applicable exploration activities.

Compliance with the requirements was evaluated using the pre-determined scoring criteria (described in Section 6.2) and the results of the audit are described in detail in Section 7 of this report. A straight compliance of 37% and a weighted compliance of 63% was achieved against the requirements of the EMPr. A straight compliance of 40% and a weighted compliance of 70% was achieved against the requirements of the RoD.

The Auditor also undertook an evaluation of the adequacy of the EMPr to determine the ability of the EMPr's, to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an ongoing basis. It is the auditors opinion that the 2010 EMPr does, in large part, sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an ongoing basis. However, certain shortcomings have been identified which should be amended.

1 INTRODUCTION

The Petroleum Oil and Gas Corporation of South Africa (Pty) Ltd (PetroSA) is the holder of a converted Production Right for petroleum issued in accordance with the Minerals and Petroleum Resources Development Act (Act 28 of 2002-MPRDA). PetroSA is required to implement the production activities in accordance with the requirements of the approved Record of Decision (RoD) (Petroleum Agency South Africa, 2011) and associated

¹ Please note that the EIA and subsequent approval of the EMPr predates the requirement for an Environmental Authorization under the National Environmental Management Act.



Environmental Management Programme (EMPr) (Lwandle Technologies (Pty) Ltd, 2010). Regulation 34 of the National Environmental Management Act (Act 107 of 1998-NEMA), Environmental Impact Assessment Regulations (GNR982) requires that the holder of an approved EMPr must, for the period during which the EMPr remains valid, ensure that the compliance with the conditions of the EMPr and RoD are audited.

This report aims to comply with these obligations to audit compliance with the RoD and associated EMPr and submit the findings of the audit to the relevant competent authority, in this case the Petroleum Resources Agency of South Africa (PASA).

2 ACTIVITY DESCRIPTION

PetroSA's Block 9 licence area covers a surface area of 22,756km² and presently includes four production lease areas: FA-EM; South Coast Gas (SCG), FO and Oribi/Oryx. Each of these areas has its own EMPr, and in some instances EA's or RoD's. This audit report is relevant to the FA-EM Production Area and associated RoD and EMPr. The FA-EM production area comprises the FA Production Platform, the FA well field, the FA Satellite field, and the EM field.

The location of the FA-EM production area within the context of the other production areas in Block 9 is illustrated in Figure 1. The location of the FA-EM Production area is presented in Figure 2. The FA-EM production area is made up of the FA gas fields (close to the FA Platform), and the adjoining FA Satellites gas fields (~16 km to the north of the FA Platform), and EM-fields (~50 km to the west of the FA Platform).

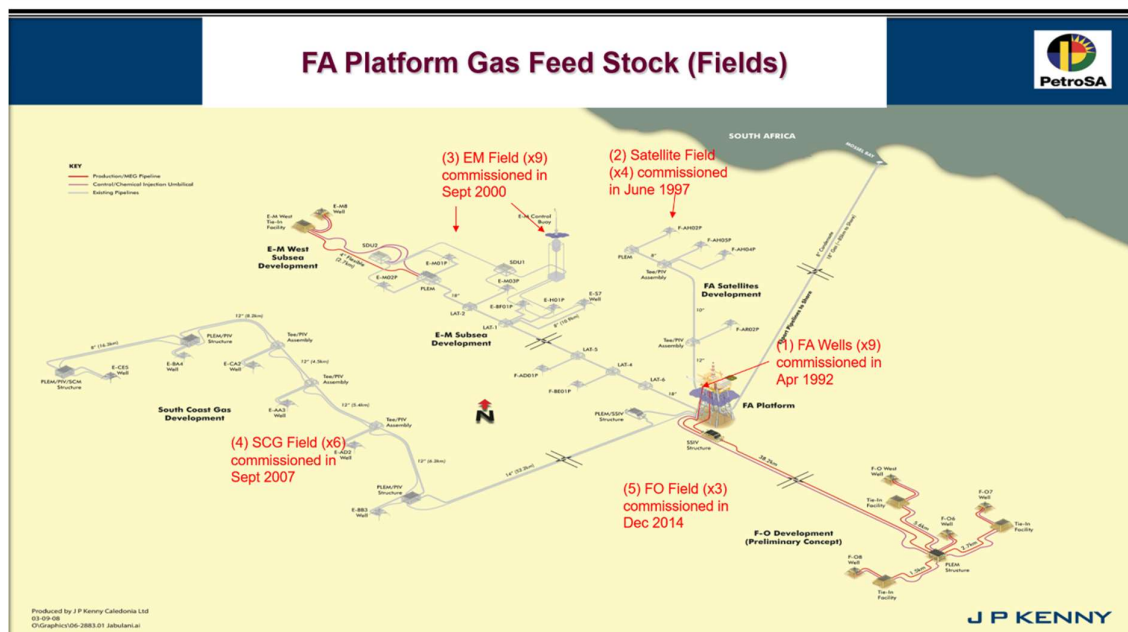
Each well field comprises the following number of wells:

- FA Field: 9 wells, last well shut-in in February 2024.
- FA Satellite Field: 3 wells, last well shut-in in December 2020.
- EM Field: 7 wells, last well shut-in in August 2022.

The well fields are connected to the FA Platform via sub-sea pipelines and associated infrastructure. Three wells from the EM field are operated from the FA via the EM Control Buoy, located approximately at the centre of the reservoir areas. Gas and condensate from the well fields is controlled, processed, and separated at the FA Platform, before being exported to the PetroSA Gas-to-liquids (GTL) plant at Mossel Bay, through an export pipeline.

The FA Platform is a fixed manned platform in the FA field situated approximately 85 km south of the coastal town of Mossel Bay. The nearest point to shore from the platform is the Gouritz River mouth about 74 km away.

The FA Platform is currently in a state of care and maintenance. Production at the platform ceased in February 2024.



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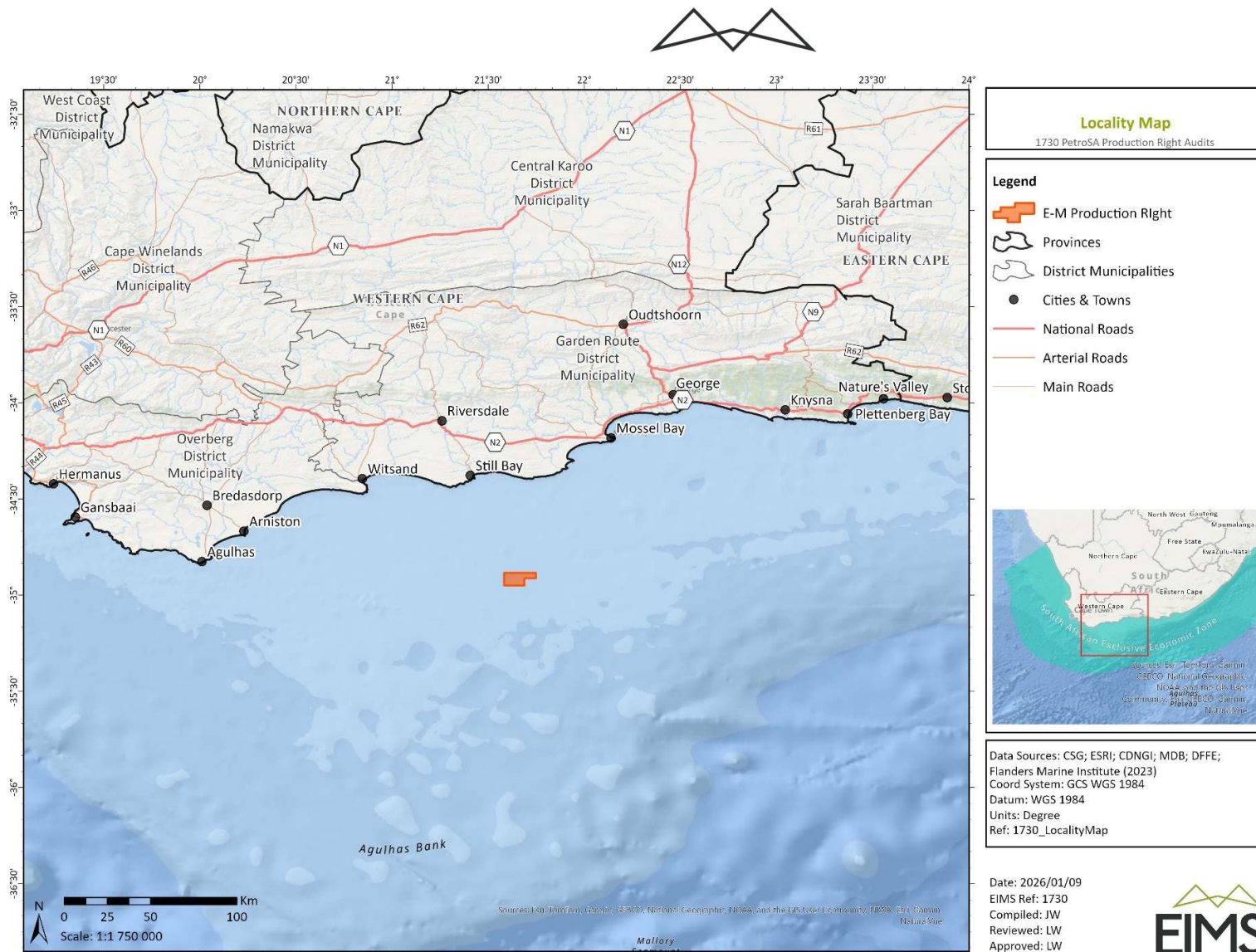


Figure 2: Locality map.



3 LEGISLATIVE FRAMEWORK

Regulation 54A(2) of the EIA Regulations requires all rights and permits issued in terms of the Mineral and Petroleum Resources Development Act, Act 28 of 2002 (MPRDA) and associated Environmental Management Plans/ programmes to be subjected to the audit requirements stipulated in Part 3 of Chapter 5 of the EIA Regulations.

Regulation 54A(2) states that: *Where a right or permit issued in terms of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002) and the associated Environmental Management Programme or Environmental Management Plan approved in terms of the Mineral and Petroleum Resources Development Act, 2002 (Act No. 28 of 2002) is still in effect after 8 December 2014, the requirements contained in Part 3 of Chapter 5 of these Regulations apply to such Environmental Management Programmes or Environmental Management Plans, and where-*

(a) the audit or performance assessment cycle of the Environmental Management Programme or Environmental Management Plan exceeds five years, an audit report will be required to be submitted at least every five years commencing from the date of submission of the last audit, for the period during which the right or permit remains in effect; or

(b) no audit or performance assessment requirement was set in the Environmental Management Programme or Environmental Management Plan, an audit report will be required to be submitted to the competent authority no later than 7 December 2021 and at least every 5 years thereafter for the period during which the right or permit remains in effect.

Part 3 of Chapter 5 of the Regulations refers to requirements for auditing and amendment of an Environmental Authorisation or Environmental Management Programme. This audit was undertaken in line with these requirements.

4 DETAILS OF THE AUDITOR

The environmental audit was undertaken by Liam Whitlow from EIMS.

4.1 EXPERTISE OF THE AUDITOR

Liam Whitlow is an experienced Environmental Scientist with a B.Sc. Honours in Environmental Management and over 25 years of professional experience. Liam is a registered Environmental Assessment Practitioner and Professional Natural Scientist. His expertise includes environmental impact assessments, project management, and environmental monitoring, with significant experience in the oil and gas, mining and infrastructure sectors.

4.2 DECLARATION OF INDEPENDENCE

I, Liam Whitlow, declare that –

- I act as the independent Environmental Auditor;*
- I will perform the work relating to the environmental audits in an objective manner, even if this results in views and findings that are not favourable to the Client;*
- I declare that there are no circumstances that may compromise my objectivity in performing such work;*
- I have expertise in conducting environmental audits, including knowledge of the environmental Acts, regulations and any guidelines that have relevance to the audited operations;*
- I will comply with the relevant Acts, regulations, and all other applicable legislation;*
- I have no, and will not engage in, conflicting interests in the audit process;*
- I realise that a false declaration is an offence in terms of regulation 48 and is punishable in terms of section 24F of the NEMA; and*



- *I do not have and will not have any vested interest (either business, financial, personal, or other) in the audit other than remuneration for work performed.*

Signature of Auditor

5 SCOPE, PURPOSE AND OBJECTIVE OF THE AUDIT

The scope of the audit is to assess compliance with the conditions of the RoD and approved EMPr and to confirm the continued adequacy of the EMPr. The purpose of the audit is to ensure compliance with the requirement of the RoD and EMPr and the NEMA EIA Regulation 34 to undertake scheduled compliance audits. The objectives of the audit are to determine:

- The level of performance against and compliance with the provisions of the requisite RoD and EMPr; and
- The ability of the measures contained in the EMPr, to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the authorised activities.

The scope of the audit is defined by the activities that were undertaken for each area during the defined audit period June 2015 to December 2025. Auditing compliance with the following documents is included:

- Current approved EMPr (Lwandle Technologies (Pty) Ltd, 2010); and
- RoD (Petroleum Agency South Africa, 2011).

6 AUDIT METHODOLOGY

6.1 PROCEDURE FOR THE AUDIT

Initial documentation was obtained and reviewed in preparation for the audit. A checklist was prepared based on the requirements of the RoD and EMPr respectively. Compliance was verified through selected documentation review, interviews, or site inspection. Compliance with the requirements was evaluated using the pre-determined scoring criteria as described in Section 6.2 and the results of the audit are described in Section 7 of this report.

The Environmental Audit is primarily a Compliance Audit against the conditions of the RoD and approved EMPr. Findings from the audit that did not relate to a RoD or EMPr condition did not contribute to the audit score. However, where deficiencies have been identified that do not necessarily correspond to specific EMPr conditions, these findings have been used to provide recommendations for improvement. Various documentation and records were required during the audit to confirm compliance with the requirements and were made available electronically for review.

There is wide variety of South African environmental legislation, and the organisation is required to comply with all relevant legislation. Whilst consideration was given to the relevant environmental legislation, a full comprehensive legal compliance audit is beyond the scope of this audit.

6.2 EVALUATION CRITERIA USED DURING THE AUDIT

Compliance scoring is based on a pre-determined system, with each EMPr condition weighted equally. The audit used the following compliance scoring criteria:

- Fully Compliant: Indicating that the condition was fully complied with and provided with a compliance rate score of 4.



- Partially Compliant: Indicating that the condition has not been fully complied with and that additional measures are required to obtain full compliance. Partial compliances were provided with a compliance rating score of 2.
- Non-Compliant: Indicating that the condition has not been complied with and provided with a compliance rating score of 0.
- Not Applicable (N/A): Indicating that the condition is not currently applicable. Not applicable conditions were removed from the total number of conditions from which the compliance score was calculated during this reporting period.
- Not Verified: Where the auditor could not confirm compliance due to insufficient, incomplete or unavailable evidence, the term “Not Verified” has been used as an evidentiary status. This does not constitute a formal compliance rating and does not replace the rating categories defined above. Where the absence of evidence relates to a condition that requires active implementation, record keeping, labelling, monitoring or reporting, the auditor may, depending on the nature of the condition and the available evidence, rate the condition as Partially Compliant or Non-Compliant. “Not Verified” is therefore used only to explain the evidentiary basis for the finding and should not be interpreted as confirmation of compliance.

It is noted that the overall compliance is presented in both a straight compliance (i.e. strict compliant/ non-compliant) as well as the weighted compliance (i.e. where partial compliance is represented).

6.3 CONSULTATION PROCESS UNDERTAKEN

The findings of this assessment are based on meetings / interviews and documentation reviewed. A physical site inspection of the FA Platform was undertaken on the 16th to the 17th of December 2025. Various PetroSA representatives were interviewed and engaged during the audit, including:

- Nomphele Cele (First Aid);
- Mmaphefo Maqhashalala (waste collection);
- Japie Mars (control room);
- Phillip Sibanda (production operator);
- Khangelani Samente (Radio room);
- Patrick (Xolile) Malashe (Upstream Reliability Manager);
- Raynard Pearce (SHEQ Officer);
- Dian John (Environmental leader); and
- Renay Pillay (HSEQ: Environment representative).

As per Regulation 34 of the EIA Regulations, 2014, all potential and registered interested and affected parties should be notified of the submission of the report to the authorities and the report should be made available to anyone on request and it should be made available on a publicly accessible website, where the holder has such a website.

7 RESULTS OF THE AUDIT

This section of the report details the audit results. It comprises a summary of compliance with the RoD and EMPr requirements, the compliance evaluation results, a summary of findings, and an analysis of the ongoing adequacy of the EMPr.

A total of 95 conditions (commitments) were identified in the EMPr. Eighteen of these conditions were considered not applicable to the current phase of the project. Of the applicable conditions 32 were regarded as



being compliant, and the remaining 45 as non-compliant (of which 38 were regarded as being partially compliant).

A total of 13 conditions (commitments) were identified in the RoD. Three of these conditions were considered not applicable to the current phase of the project. Of the applicable conditions 4 were regarded as being compliant, and the remaining 6 as non-compliant (all 6 of which were regarded as being partially compliant).

The level of compliance for each commitment was calculated according to the methodology described in section 6.2. Utilising this scoring system, the following compliance scores were obtained:

- EMPr Compliance:
 - Straight compliance: 42%
 - Weighted compliance: 66%
- RoD Compliance:
 - Straight compliance: 40%
 - Weighted compliance: 70%



7.1 COMPLIANCE EVALUATION

7.1.1 EMPr

The compliance evaluation of the EMPr is provided in Table 1. The conditions were rated according to the compliance evaluation criteria described in 6.2.

Table 1: Compliance evaluation of the relevant EMPr conditions.

Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
Activity 1: ACTIVITY 1. LEAK/ SPILL PREVENTION: Objectives: · To check the integrity of all pipe work and equipment on the platform and sea bed in a systematic and scheduled manner to minimise the risk of rupture or leakage which could cause pollution of the sea · To replace, repair and maintain all pipe work and equipment on the platform and sea bed in a systematic and scheduled manner to minimise the risk of rupture or leakage which could cause pollution of the sea · To detect any leaks or ruptures so that they can be repaired speedily · To formally and critically evaluate the circumstances of any ruptures and leaks in order to plan for prevention of recurrence.					
Activity 1.1: Subsea Infrastructures Maintenance and Monitoring					
EMPr	201 1_1 .1.1	All undersea structures including pipe works and valves shall be subject to scheduled inspection and maintenance as per the flow diagram below.	N	2	The EMPr requires that inspection schedules should ensure inspection at intervals of no greater than 5 years. The auditee noted that inspections on the subsea infrastructure are undertaken at certain intervals determined using a risk based programme . The Risk Based Sub-sea Inspection Record indicates the following: - FA Platform Jacket critical welds inspection from 0-50m Sea Depth was undertaken in March 2025; - FA Platform Jacket Critical Welds Inspection from 50m to 110m Sea depth was undertaken in March 2025; and - Intelligent Pigging of 8" Export Condensate Pipelines from FA Platform to Refinery was undertaken in March 2024. No other sub-sea inspections were recorded to have taken place in the last 5 years as required by the EMPr. Outstanding inspections apply to the export gas pipeline, sub-sea infrastructure ROV inspections, and EM Field Buoy. It is noted in the 2015 ROV Survey for FA Satellites and SCG



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
					infield infrastructure (MDC; 2015), that certain aspects required attention, e.g. insufficient cathodic protection, damaged and missing piggy back straps. Evidence was provided that the cathodic protection was subsequently addressed in 2016. No confirmation was provided that the remaining aspects were addressed. The 2024 condensate export pipeline inspection also notes anomalies. No evidence was provided that these repairs or maintenance tasks on the condensate export pipeline were subsequently addressed. It is however noted that the export pipelines are not presently in operation and do not contain any product which could be discharged. Based on discussions with the auditee, it is understood that since cessation of operations that undersea pipelines connecting the wells to the platform have not been flushed. These therefore pose a risk of release to the environment should the pipeline containment be compromised. A risk assessment should be undertaken to inform steps to address this risk or release of residual hydrocarbons.
EMPr	201 1_1 .1.2	The results of the scheduled inspections surveys shall be subject to systematic, documented review.	N	0	No evidence of systematic, documented review was provided.
EMPr	201 1_1 .1.3	Any repairs shall be reported in The Monthly Report	N	0	No evidence was provided that the repairs undertaken have been included in the Monthly Reports.
EMPr	201 1_1 .1.4	Any leak or spill of liquids, be they on the surface or sub-sea, shall be regarded as an incident and/ or emergency and dealt with according to the incident procedure below (Activity 7.1).	N	2	PetroSA provided the 'PetroSA INCIDENT MANAGEMENT SYSTEM - Group Procedure (PetroSA; 2018). This procedure specifically includes the release from secondary containment, of a potentially hazardous or toxic agent to the ecosystem or natural resources. Incidents are recorded via a computer based system. The list of recorded incidents spanning the audit period was



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
					provided. Spills are recorded in the incident register. Incident #7042 related to a spillage of diesel. In this instance, the procedure defined in 7.1 was followed. Incident #11840 related to a spillage of diesel overboard. Whilst this incident was recorded in the incident register and an Incident Investigation report was provided, no evidence was provided that the environmental authority was notified of the event, as is required by the procedure defined in 7.1.
Activity 1.2: Interaction with Shipping					
Activity 1.2.1: Service Vessels: · To ensure that professional and seaworthy certification is appropriate to requirements · To inform the Masters of the supply and transport vessels of the actions to be taken to minimise environmental damage and the actions to be taken in the event of such damage occurring · To check that the requisite actions are taken and that they are effective in minimising environmental damage.					
EMPr	201 1_1 .2.1 .1	All contracts with service providers shall require compliance by the service provider with the EMPrs. The contracts shall specifically require that the service provider complies with all relevant legislation and indemnifies PetroSA of any shared liability in the event that the service provider contravenes legislation in spite of being required to adhere to the EMPr. PetroSA reserves the right to inspect operations on the service-provider's vessel to assess compliance. Deviations from the PetroSA procedures shall be deemed breach of contract.	N	2	No signed service agreement/purchase order/contract that contains an EMPr compliance clause referencing the specific EMPr(s) applicable to the scope was provided. The contract provided to the auditor did include clauses requiring service providers to comply with all relevant legislation, as well as PetroSA's right to undertake inspections. Further, some of the operational procedures provided to the auditor demonstrate operational control and management but do not, on their own, evidence the contractual requirements of this audit condition.
Activity 1.2.2: Other Shipping in the Area · To ensure that provisions prescribed by SAMSA to ensure that the structures and associated vessels are "visible" to marine traffic and aircraft have been implemented · To ensure that the provisions are effective in maintaining "visibility" of the structures and associated vessels.					
EMPr	201 1_1 .2.2 .1	All measures prescribed by SAMSA to minimise the risks of collision of marine traffic with the offshore structures must be implemented and maintained.	N	2	Based on the content of the quarterly reports, it is understood that certain navigational aids for the EM Buoy are no longer functional (including lights, radar beacon, and fog horns). The following navigational aids are



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
					however still available and functional, radar signal reflectors, and submarine warning beacon (pinger). SAMSA was informed and the marine navigational warning was distributed by Maritime Radio in Cape Town (Notice 154). It was also observed that there is no navigational light on the drill derrick, which is the highest point on the FA Platform. With respect to the FA, FA-Satellite, and EM well field, it is noted that the majority of the wells are reflected on the latest Notice to Mariners. However, it was noted that F-AO6P was not specifically listed in this notice.
EMPr	201 1_1 .2.2 .2	Measures to be implemented include: • Maintenance of safety and exclusion zones • Maintenance of standard watch procedures • Issue navigational warnings if visibility of structures is diminished (e.g. power outages or failure of fog horn) • Radio communication to alert approaching vessels • Use of Flares and Sirens where necessary • Recording of interactions with vessels in the installation log book • Collisions, near misses or other transgressions with associated pollution risks will be treated as incidents and handled according to the procedure detailed under Activity 7.	Y	4	Watch procedures and safety zones are implemented. Evidence was provided of the radio operation logbook which records all interactions with vessels in proximity to the platform and associated zones.
Activity 1.3: Workshops and repairs					
· To manage the workshops in a manner that minimises the risk of liquids polluting the sea and to expedite clean up of any such spillages that do occur · To minimise the risk of polluting the environment during repairs and maintenance on the vessel or platform.					
EMPr	201 1_1 .3.1	All fuels, greases, oils and other chemicals shall be stored and handled as per chemical handling procedures specified in PetroSA standard operating procedures and summarised in the chemical handling procedures below (Activity 3).	Noted	Noted	Verified through subsequent conditions in Section 1.3.
EMPr	201 1_1 .3.2	Repair and servicing of loose equipment or machinery shall be undertaken only in the workshops or within areas of the vessel or	Y	4	During the site inspection maintenance activities were being undertaken on various equipment. It is noted that the platform is designed with a contained drainage system

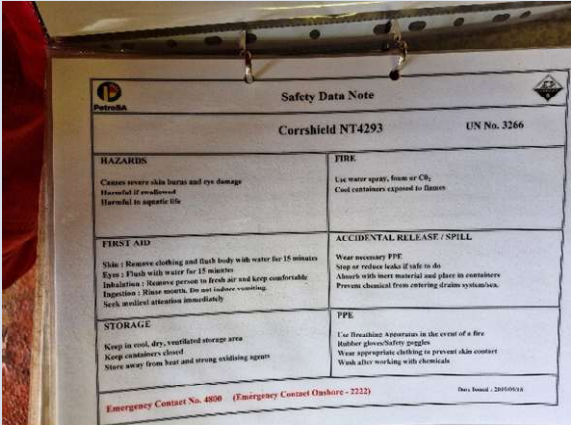


Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
		installation which has drainage dedicated to containing spilled liquid and suspended debris.			that aims to allow for controlled release of drainage. All drains (apart from high deluge) are collected and directed to the platform treatment and containment facilities.
EMPr	201 1_1 .3.3	Where repair of equipment or machinery must take place in situ, precautions appropriate to the location must be taken to minimise the risk of spills or loss of objects overboard.	Y	4	No instances which posed a risk of spills or loss of objects overboard were specifically observed during the audit. It is noted that the platform is designed with a contained drainage system that aims to allow for controlled release of drainage to the sea.
EMPr	201 1_1 .3.4	Any spills of liquids shall be treated as an incident and handled according to the procedure detailed under Activity 7.1 below.	Y	4	Incidents are recorded via a computer based system. The list of recorded incidents spanning the audit period was provided. Spills are recorded in the incident register. No spills were observed during the audit.
EMPr	201 1_1 .3.5	Any loss of objects overboard shall be treated as an incident and handled according to the procedure detailed under Activity 7.2 below	N/A	N/A	PetroSA provided the 'PetroSA INCIDENT MANAGEMENT SYSTEM - Group Procedure (PetroSA; 2018). This procedure specifically includes the loss of property as an incident. Incidents are recorded via a computer based system. The list of recorded incidents spanning the audit period was provided. No incidents related to dropped objects or objects lost overboard were recorded in the incident register. No objects were lost overboard during the audit.
ACTIVITY 2. POLLUTION PREVENTION - SUPPORT SERVICES. Objectives: · To minimise the risk of objects being lost overboard during transit or transfer · To retrieve objects which have fallen overboard before they pose a risk to the environment or shipping · To log the existence and location of fallen objects for future reference/ action · To notify interested parties of the existence and location of un-retrieved fallen objects · To minimise disturbance to large marine fauna from helicopter flights					
EMPr	201 1_2 .1.1	Existing PetroSA and aviation service providers' procedures, such as the Materials Handling & Transport and Marine Support Services procedures, shall be implemented to minimise the risk of objects and chemical	Y	4	PetroSA provided copies of the following procedures: Foreign Object Debris and Dropped Object Programme (Indwe; 2025), Flight Operations Manual (Indwe; 2021), Helicopter Operations Emergency Call Out and Response



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
		substances being dropped overboard, during cargo transfer, leaking from storage containers and during handling.			Procedure (PetroSA; 2025), Standing Instruction for Moving Items Onshore From FA Platform by Boat (PetroSA; 2021), Standing Instruction for Moving Items Ashore From FA Platform by Helicopter (PetroSA; 2010). The procedures do include operational measures to prevent objects, tools, components, materials, from being released, dislodged, or lost from helicopters or associated equipment.
EMPr	201 1_2 .1.2	Helicopter transfers to and from offshore installations shall fly at a minimum height of 500m above sea level and shall not hover or circle over whales, dolphins, sharks, turtles or aggregations of seabirds.	N	2	The Flight Operations Manual (Indwe; 2021) requires a minimum flight altitude of 1500 ft (457.2 m) outside of the controlled airspace. Altitude during the site inspection was above 500m for the greater majority of the flight. Evidence of the findings of a compliance inspection undertaken by the PASA in September 2019 indicated that the helicopter from and to the FA Platform flies at a height range of 1500 and 2000 feet and that such is not in line with the approved 500m flight height.
EMPr	201 1_2 .1.3	Helicopter flight logs will be kept to demonstrate compliance with set flight paths.	Y	4	Helicopter flight logs were provided. The set flight paths include defined check points. The flight log records the passing of each check point during each flight.
ACTIVITY 3. CHEMICAL STORAGE AND HANDLING Objectives: · To handle and store chemicals in such a way as to minimise the risk of spillage or leakage · To dispose of expired chemicals in an environmentally responsible and legal manner · To respond to any spills and or leaks in such a way that environmental damage does not occur · To formally evaluate any spills or leaks in order to plan for prevention of recurrence					
Activity 3.1: Measures for Chemical Storage and Handling					
EMPr	201 1_3 .1.1	A chemical register shall be maintained by the facility which will detail: - o All chemicals used and stored by the facility - o Chemical characterisation of each chemical including SABS class and hazard rating. - o Specific storage handling or disposal requirements for each chemical including Personal Protective Equipment	N	2	A weekly chemical stock sheet was provided which lists the chemicals, storage type, volume of containers, quantity of containers and notes. The stock sheet does not provide details on the chemical characterisation, handling and disposal requirements, or the emergency response actions. Each chemical storage area has an index of chemicals



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
		- o Emergency response actions for each chemical - o The process used to verify the information contained in the register			stored as well as a Safet Data Sheet for each chemical. The Safety data sheet includes the UN number, the hazard statement, storage requirements, first aid requirements, fire management, accidental release actions, and required PPE. The register does not describe or provide for a process to verify the information contained in the register. In one instance a chemical was present in the storage area that was not specifically listed in the associated chemical index (tridol, M05 Roof).  Photo 1: Safety data sheet
EMPr	201 1_3 .1.2	All containers of hazardous liquids shall be stored inside impermeable bunds (portable or fixed) which have a total capacity of 110% of the total amount liquid stored inside them. This shall apply both in store-rooms and in situations where containers have been temporarily moved from the store room to a position close to where the contents are being used for convenience.	N	0	The platform does have designated chemical storage areas for hazardous substances. These areas are bunded. It was observed that many of the bunded areas are designed and fitted with a dedicated drain that drains to the platform's dirty water interceptor tank. According to PetroSA this drain is designed as an open drain to ensure that there is no overflow of chemicals in the event of a spill, and



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
					consequently the bund capacity is negated due to this open drain. It is the auditor's experience that such drains should include a manual valve that is kept closed and only opened when necessary and following assessment of the fluids to be drained (for disposal requirements and compatibility risks).  Photo 2: Segmented bund area at chemical store. Evidence from a PASA inspection undertaken in November 2018 indicated that the impermeable bunds used to store hazardous liquids in MO5 did not provide 110% containment capacity for the volume stored. Numerous instances were observed where hazardous materials (incl biocides, oils, fuel contaminated water) were being stored outside of the dedicated bunded areas or mobile drill/ spill trays.



					 Photo 3: Contaminated water stored without drip tray. Post the audit, the auditee has confirmed that the bund storage and operational capacities have been clearly marked on each bund area. Photo 4: Post audit marking of M0-5 roof bund capacity. 
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Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
					 Photo 5: Post audit marking of M0-5 roof bund capacity.  Photo 6: Post audit marking of M0-5 Level 2 bund capacity.



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
EMPr	201 1_3 .1.3	All chemicals shall have current Material Safety Data Sheets (MSDS) prominently displayed at the location of storage and use	N	2	Each chemical storage area has an index of chemicals stored as well as a Safety Data Sheet for each chemical. The Safety data sheet includes the UN number, the hazard statement, storage requirements, first aid requirements, fire management, accidental release actions, and required PPE. In one instance a chemical was present in the storage area that was not specifically listed in the associated chemical index (tridol, M05 Roof).  Photo 7: MSDS Cellar Deck
EMPr	201 1_3 .1.4	Incompatible chemicals shall not be stored in the same location	N	2	The chemical stock sheet provided lists the various chemicals stored in each location. It was noted that certain incompatible chemicals are being stored together (e.g. Hydrochloric acid and Sodium Hypochlorite; CO1-sodium metabisulphide reacts with water or acids). 8



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification																																																
					PetroSA FA Platform – C01 Index of Chemicals 2025 <table><thead><tr><th>Description</th><th>Use</th><th>UN No</th></tr></thead><tbody><tr><td>1 Corrtreat 702</td><td>Corrosion Inhibitor</td><td>1760</td></tr><tr><td>2 Nalco 71DS Plus</td><td>Antifoam</td><td>1993</td></tr><tr><td>3 Corrosnald N14253</td><td>Corrosion Inhibitor</td><td>2296</td></tr><tr><td>4 Nat 900</td><td>Corrosion Inhibitor</td><td>3219</td></tr><tr><td>5 Sodium Hypochlorite</td><td>Water purification</td><td>1791</td></tr><tr><td>6 TEG – Tri Ethylene Glycol</td><td>Gas Dew Point</td><td>N / A</td></tr><tr><td>7 MEG – Mono Ethylene Glycol</td><td>Hydrate Prevention</td><td>N / A</td></tr><tr><td>8 Methanol</td><td>Hydrate Breaker</td><td>1230</td></tr><tr><td>9 Hydrochloric Acid</td><td>Acid Wash</td><td>1789</td></tr><tr><td>10 Nitrogen</td><td>Purging</td><td>1066</td></tr><tr><td>11 Diesel</td><td>Fuel</td><td>1202</td></tr><tr><td>12 Transasub</td><td>Hydraulic Fluid</td><td>3682</td></tr><tr><td>13 HAF 5125</td><td>Fire Extinguisher</td><td>3320</td></tr><tr><td>14 Hytrex 9076C-PB</td><td>KH1</td><td>N / A</td></tr><tr><td>15 Sodium Metabisulphite</td><td>Oxygen Scavenger</td><td>1789</td></tr></tbody></table> Photo 8: Chemical stock sheet	Description	Use	UN No	1 Corrtreat 702	Corrosion Inhibitor	1760	2 Nalco 71DS Plus	Antifoam	1993	3 Corrosnald N14253	Corrosion Inhibitor	2296	4 Nat 900	Corrosion Inhibitor	3219	5 Sodium Hypochlorite	Water purification	1791	6 TEG – Tri Ethylene Glycol	Gas Dew Point	N / A	7 MEG – Mono Ethylene Glycol	Hydrate Prevention	N / A	8 Methanol	Hydrate Breaker	1230	9 Hydrochloric Acid	Acid Wash	1789	10 Nitrogen	Purging	1066	11 Diesel	Fuel	1202	12 Transasub	Hydraulic Fluid	3682	13 HAF 5125	Fire Extinguisher	3320	14 Hytrex 9076C-PB	KH1	N / A	15 Sodium Metabisulphite	Oxygen Scavenger	1789
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EMPr	201_3.1.5	Personnel using chemicals shall be trained in their use, disposal and clean-up.	Y	4	The personnel interviewed on the audit were aware of the chemical register and the associated safety datasheet files. Evidence was provided that training is carried out on certain substances and their associated MSDS's.																																																
EMPr	201_3.1.6	Any chemicals which are used at a location distant from their storage shall be transported in drip trays.	N	2	Instances of temporary storage of substances in drip trays was observed. In other instances hazardous substances were not stored with drip trays.																																																
EMPr	201_3.1.7	Expired chemicals shall be labelled as waste and treated in accordance with the disposal requirements specified in their MSDS	N	2	During the audit numerous chemical receptacles were inspected. Very few, if any, included specified expiry dates. Whilst certain chemicals may be stable for long periods, it is expected that certain chemicals, such as biocides, will have a limited shelf life- the chemical batch dates for the biocides observed is 2022. Without defined expiry or re-																																																



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
					testing dates it is not possible to verify compliance with this condition.
EMPr	201 1_3 .1.8	Any liquid spills of more than 5 litres shall be treated as an incident and handled according to the incident procedure detailed under Activity 7.1 below	N	0	PetroSA provided the 'PetroSA INCIDENT MANAGEMENT SYSTEM - Group Procedure (PetroSA; 2018). This procedure specifically includes the release from secondary containment, of a potentially hazardous or toxic agent to the ecosystem or natural resources. Incidents are recorded via a computer based system. The list of recorded incidents spanning the audit period was provided. Spills are recorded in the incident register. The procedure does not limit the incident to 5 litres. The incident register records an incident on the 28th December 2024 as 'Oil sheen observed on the North side of the Platform' (#12172). Evidence was provided that this incident was reported to the SAMSA, however no evidence was provided that this environmental incident was reported to the environmental regulator as is required by EMPr condition 7.1.2.
EMPr	201 1_3 .1.9	Any loss of chemicals overboard shall be treated as an incident and handled according to the procedure detailed under Activity 7.1.	N/A	Not verified	PetroSA provided the 'PetroSA INCIDENT MANAGEMENT SYSTEM - Group Procedure (PetroSA; 2018). This procedure specifically includes the release from secondary containment, of a potentially hazardous or toxic agent to the ecosystem or natural resources. Incidents are recorded via a computer based system. The list of recorded incidents spanning the audit period was provided. Spills are recorded in the incident register and reported according to the requirements of Condition 3.1.8.. No loss of chemicals overboard (not spills) was noted in the incident register or during the site inspection. Note that spills would in the auditors opinion be reported and recorded in accordance with condition 3.1.8. above.
ACTIVITY 4. SOLID WASTE MANAGEMENT					



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
Objectives: · To prevent any waste from entering the marine environment except for macerated galley waste and macerated and treated sewage waste · To reduce the amount of waste disposed to landfill by reducing waste generation and maximising recycling and reuse · To comply with waste management legislation · To dispose of all solid waste in an environmentally responsible manner					
Activity 4.1: Measures necessary for Solid Waste Management					
EMPr	201 1_4 .1.1	The facility shall review its waste management on an annual basis using the hierarchy depicted below (source http://www.envirowise.gov.uk/uk/our-services/resource-efficiency.html). This shall be a formal, documented review of all wastes, and results shall be reported to MANCO. The program shall document waste reduction targets for the forthcoming year.	N	2	Formal annual waste management review is not carried out. The waste management hierarchy is applied to some extent on the platform. The waste generated at FA Platform is separated into different waste skips and is stored at dedicated areas. All wastes skips are clearly marked. The waste skips are transported with the supply vessel to the Mossel Bay Port for intermediate storage prior to collection of the waste skips by PetroSA Transport Department. The waste is transported to the PetroSA landfill site for disposal. PetroSA landfill site is governed by a waste management license (WML 12/9/11/L785/9/R1), which dictates the requirement of waste disposal. The facility does separate and recycle wastes and wastes recyclable waste are itemised on the waste manifests, however it was noted that on occasion the recycled wastes are disposed of at the same facility as the general wastes (e.g. manifest # 5635, 5637, 26 December 2024- no Manifest #, 5632, 5671). No waste reduction targets were provided.
EMPr	201 1_4 .1.2	Waste Management Hierarchy- see Figure 1.	Noted	Noted	
EMPr	201 1_4 .1.3	The facility shall develop and maintain a Waste Register which shall detail: o Each waste produced by the facility o Their source o Their SABS class and hazard rating	N	2	Whilst the platform does have defined procedures for waste segregation, management, storage and disposal, these are not represented in a defined Waste Register.



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
		- o Their disposal methods - o Any specific precautions or legislative requirements			
EMPr	201 1_4 .1.4	Waste Register: see Figure 2.	Noted	Noted	
EMPr	201 1_4 .1.5	The Waste Register shall be reviewed and updated annually	N	0	No dedicated waste register was provided.
EMPr	201 1_4 .1.6	Waste shall be segregated into the following categories. Recyclables shall be stored separately as shall hazardous waste. See Figure 3.	Y	4	The platform does have defined procedures for waste segregation, management, storage and disposal. Hazardous, recyclable and non-recyclable wastes are separated and stored separately. Very few instances were observed where separation was not fully complied with- this is a housekeeping issue.  Photo 9: Recyclable and non-recyclable waste stored together.



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
EMPr	201 1_4 .1.7	All wastes shall be handled according to the flow diagram below while awaiting transport to disposal sites. See Figure 4.	N	2	The platform does have defined procedures for waste segregation, management, storage and disposal which partially align with the flow diagram provided. The requirement for labelling wastes prior to containment and storage is not being implemented.
EMPr	201 1_4 .1.8	No waste may be stored for more than 30 days on any facility without formal permission from DEA.	Y	4	Wastes collected and stored on the platform are removed on a regular basis by the support vessels.
EMPr	201 1_4 .1.9	Wastes shall be stored in sealed containers or bags and protected from the environment according to specifications for storage in the Minimum Requirements for the Handling, Classification and Disposal of Hazardous Waste published by Department of Water Affairs and Forestry in 1998.	N	2	The minimum requirements document referenced relates to hazardous wastes. Hazardous wastes are stored in marked storage skips which include lids to protect against the environment. It was noted that certain hazardous waste skips were full and in others the lids were not in place. The other wastes are stored in open skips in sealed plastic bags. It was observed that cardboard is being stored loose in the recyclable waste storage skip. In high wind conditions it is likely that these will be blown out of the skips.



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
					 Photo 10: Hazardous waste skip  Photo 11: Uncovered waste skip.
EMPr	201 1_4 .1.1 0	Incompatible waste may not be stored in the same location (see the hazard ratings for wastes in the Minimum Requirements for the Handling, Classification and Disposal of Hazardous Waste published by Department of Water Affairs and Forestry in 1998 for compatibility).	Y	4	Waste types are stored in separate skips. No incompatible wastes being stored together were observed.



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
EMPr	201 1_4 .1.1 1	Galley waste shall be macerated at sea to pieces smaller than 25mm and deposited overboard in accordance with MARPOL requirements, or disposed to landfill onshore.	Y	4	Galley wastes are currently being collected, stored and disposed of to landfill.
EMPr	201 1_4 .1.1 2	Sewage shall be treated as per Section 5.3.	Noted	Noted	Compliance to be verified in 5.3.
EMPr	201 1_4 .1.1 3	Waste removal from the platform or vessel shall be handled according to the following flow diagram. See Figure 5.	Y	4	Waste skips are labelled. Chain of custody and waste disposal manifest notes are available.
EMPr	201 1_4 .1.1 4	The offshore facility shall develop and maintain a waste manifest system which details: · The quantities of all wastes leaving the facility · The date upon which they left · The date upon which they were received by the disposal facility · Proof of correct disposal by the landfill site (safe disposal certificate for hazardous waste)	N	2	Waste disposal manifest / transfer notes were provided. In some instances these manifests/ transfer notes were not completed in full (no signed receipt of waste at disposal site- see WTN 5383). Safe destruction records were provided for medical wastes. The majority of waste manifests indicate that wastes are disposed of at the PetroSA waste disposal facility located in Mossel Bay (Licence # 12/9/11/L785/9/R1). This licence provides for hazardous waste storage and general waste disposal.
EMPr	201 1_4 .1.1 5	A safe disposal certificate shall be issued for each load of hazardous waste.	N	0	The hazardous wastes generated by the platform are transported to the PetroSA Waste management Facility in Mossel Bay (Licence # 12/9/11/L785/9/R1). This licence provides for hazardous waste storage and general waste disposal. It is however noted that the PetroSA landfill is only licenced for storage of hazardous wastes and not disposal. Safe disposal certificates for hazardous waste disposal have not been provided. No safe disposal certificates for hazardous wastes were provided.
EMPr	201 1_4	The safe disposal certificate shall be filed in the waste manifest	N	2	The quarterly reports provide details on the types of wastes generated and disposed of. The relevant waste



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
	.1.1 6				transfer and disposal manifests are attached to these reports. Safe disposal certificates are provided for medical wastes. The general wastes are disposed of at the PetroSA Mossel Bay landfill and according to Regulation 11 (3) of the Waste Classification and Management Regulations (GNR 634, 2013), the requirement for a waste manifest for hazardous wastes do not apply to waste generators who are also the waste managers. It is however noted that the PetroSA landfill is only licenced for storage of hazardous wastes and not disposal. Safe disposal certificates for hazardous waste disposal have not been provided.
EMPr	201 1_4 .1.1 7	The volumes of each waste type generated and disposed as well as the disposal site and method shall be reported in The Monthly Report	N	2	The FA Platform SHEQ monthly reports include a subsection on waste management. The report provides quantities of recyclable, domestic, and hazardous wastes. The monthly report does not report on disposal site and method as is required. The quarterly reports provide details on the types of wastes generated and disposed of. The relevant waste transfer and disposal manifests are attached to these reports.
EMPr	201 1_4 .1.1 8	Waste disposal records shall be stored for submission to the Waste Management Officer should the Officer at DEA require it.	N/A	N/A	Waste disposal records are stored and would be available should the Waste Management Officer request such.
EMPr	201 1_4 .1.1 9	All personnel shall receive regular training on the handling and management of waste	Y	4	Environmental awareness training and toolbox talks are reported in the monthly SHEQ reports. Training on waste management aspects are recorded in February 2025, March 2025, May 2025, June 2025, July 2025, and August 2025.
ACTIVITY 5. DISCHARGE OF EFFLUENT Objectives: · To contain any effluents which could pose a threat to the marine environment · To treat any effluents before discharge in order to minimise damage to the marine environment · To comply with legislative obligations for effluent discharge.					



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
Activity 5.1: Produced Water					
EMPr	201 1_5 .1.1	No produced water may be discharged to the sea unless the oil concentration is below 40ppm. FOOTNOTE: Limit specified in a Pollution Safety Certificate issued by SAMSA on 23/01/2008. In contrast PARCOM 1/17/1 stipulates that no produced water may be discharged to the sea unless the oil concentration is below 100ppm, further discharged produced water oil content should be managed such that the monthly mean concentration is equal to or less than 40ppm.	N	2	Daily produced water discharge records were provided. During the audit period discharge volumes peaked in July 2015 and gradually tapered off towards February 2024. No produced water has been generated or consequently discharged from the FA Platform since the platform shut down in February 2024. Following a review of available monitoring results and incident registers during the audit period a few incidents were noted where produced water was discharged above the thresholds - Incident 4773- 1st December 2017, Incident 7685-10 November 2019.
EMPr	201 1_5 .1.2	Oil concentration of produced water shall be monitored continuously automatically and concentrations logged daily. In the event of breakdown of automatic measurements, manual measurements shall be made at least twice daily until equipment is repaired.	N	2	The platform produced water management system was equipped with an automatic online analyser. Whenever the content exceeds 40ppm, the system diverts automatically to the interceptor tank, for further cleaning. It is noted that the online analysers stopped functioning in November 2019. Alternative means were implemented to avoid uncontrolled discharge, including diverting produced water to shore for further testing and treating via the export pipelines. This process ceased in November 2022. Since November 2022 until the platform ceased generating produced water in 2024 the produced water was directed through the onboard water treatment systems and discharged without pre-emptive testing for oil content. Ad hoc samples were however collected and sent to the onshore testing facilities for retrospective confirmation of oil content.
EMPr	201 1_5 .1.3	In the event that the oil concentration reaches or exceeds 40ppm the root cause of exceedance shall be investigated and rectified	Y	4	As noted in comments for condition 5.1.1, two instances of exceedances of oil content of produced water were noted during the period that the online analyser was functional (up to November 2019). Both Incident 7685 and 4773 were recorded on the incident management system and incident



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
					investigations including root cause and corrective actions were completed.
EMPr	201 1_5 .1.4	The systems controlling the produced water discharges must be kept in good working order	N	2	As noted in EMPr condition 5.1.2, the online analyser has not been functional since November 2019. Prior to this the online analyser was maintained and functioned according to specification.
EMPr	201 1_5 .1.5	The monitoring results shall be filed and retained for 5 years.	Y	4	The results of monitoring that was undertaken over the preceding 5 years was presented in the monthly and quarterly reports.
EMPr	201 1_5 .1.6	The concentration of oil in produced water as determined in 5.1.2 shall be reported in The Monthly Report	N	2	The produced water discharge records indicate that produced water was last discharged in February 2024. No record of the monitoring results were included in the February or March 2024 Monthly reports. Earlier monthly reports do present graphical results.
EMPr	201 1_5 .1.7	Any discharges of produced water at or exceeding 40ppm oil concentration shall be treated as an incident, reported and investigated accordingly.	Y	4	Following a review of available monitoring results and incident registers during the audit period a few incidents were noted where produced water was discharged above the thresholds - Incident 4773- 1st December 2017, Incident 7685-10 November 2019. These incidents were captured and addressed through the PetroSA incident management procedure.
Activity 5.2: Deck & Bilge Water					
EMPr	201 1_5 .2.1	No deck or bilge water may be discharged to the sea unless the oil concentration is below 15ppm (MARPOL standard)	N	2	Following a review of available monitoring results during the audit period instances were recorded of drains water with an oil content exceeding the specified threshold being discharged (incident 12468- 17 February 2025; Incident 12172-29 December 2024).
EMPr	201 1_5 .2.2	Oil concentration of discharged bilge and deck water shall be monitored continuously automatically and concentrations logged daily. In the event of a breakdown of automatic measurements then manual measurements shall be made twice daily until equipment is repaired	N	2	The FA platform has a dedicated drainage system designed to collect and permit the safe and efficient disposal of drainage water (including wash down water, spillages and liquid wastes from the various Process and Utility Areas). The system collects all drains water and directs this to an



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
					interceptor tank, which is then passed through the platform's oil water treatment process prior to being discharged overboard if within specifications (i.e. 15ppm). As noted in condition 5.1.2, the online analysers stopped functioning in November 2019. Alternative means were implemented to avoid uncontrolled discharge, including diverting drains and produced water to shore for further testing and treating via the export pipelines. This process ceased in November 2022. Since November 2022 the drains water was directed through the onboard water treatment systems and discharged without pre-emptive testing for oil content. Ad hoc samples were however collected and sent to the onshore testing facilities for retrospective confirmation of oil content.
EMPr	201 1_5 .2.3	In the event that the discharged oil concentration exceeds 15ppm the root cause of exceedance shall be investigated and rectified.	Y	4	As noted in Condition 5.2.1, instances of above specification drains water discharges were noted. All above spec drains water during 2024-2025 were recorded as incidents and associated actions undertaken, including root cause and corrective actions.
EMPr	201 1_5 .2.4	The concentration of oil in bilge water as determined in 5.1.2 shall be reported in The Monthly Report	N	2	Drain water oil concentration results have not been included in all monthly reports (e.g. February 2025).
EMPr	201 1_5 .2.5	The monitoring results shall be filed and retained for 5 years.	Y	4	Based on verification of a sample period (2024 and 2025), the results of monitoring that was undertaken over the preceding 5 years was provided.
Activity 5.3: Sewage					
EMPr	201 1_5 .3.1	Sewage shall be comminuted before discharge to the sea in accordance with MARPOL standards.	Y	4	The sewage is passed through a comminutor/ macerator prior to discharge.
ACTIVITY 6. GASEOUS EMISSIONS Objectives: · To reduce the volumes of green house gases emitted.					



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
Activity 6.1: Gaseous Emissions					
EMPr	201 1_6 .1.1	Maintain all refrigeration equipment in accordance with the scheduled maintenance program to minimise Freon release.	N	2	The FA Platform has numerous chillers. Evidence was provided of the routine maintenance schedule for these units. A register of monitoring and maintenance for the recent past was provided. Whilst most of the scheduled maintenance is completed, there is evidence that certain inspection intervals have been missed (e.g. HPA6100).
EMPr	201 1_6 .1.2	Any accidental releases of Freon shall be treated as incidents, and in addition to normal incident reporting, shall be reported to DEA	N/A	N/A	No incidents of refrigerant releases have been recorded.
EMPr	201 1_6 .1.3	Incidents shall be reported to DEA.	N/A	N/A	This condition is a duplication of what is required by condition 6.1.2.
EMPr	201 1_6 .1.4	The volume of gas flared on a daily basis shall be reported in The Monthly Report	N	2	Review of random monthly reports notes that the volume of gas flared is not itemised and reported. Flare volumes are however recorded in a separate register and reported in the quarterly reports. Flaring volumes were recorded and presented to the auditor from January 2015 to May 2024. The platform is not currently flaring.
ACTIVITY 7. INCIDENTS & EMERGENCY REPORTING & MANAGEMENT					
Objectives:					
· To provide a coherent, planned response to any incident which could adversely affect the environment · To improve response time and efficiency of the plans and the activities of staff members through drills and test runs · To provide a process for the management of an incident or emergency depending upon the severity of the occurrence · To minimise the risk of loss of solid objects overboard and to expedite the retrieval (if possible) of any objects which fall overboard · To log the existence and location of fallen objects for future reference/ action · To notify interested parties of the existence and location of un-retrieved fallen objects · Through post-emergency evaluations, minimise the risk of a recurrence of the incident					
Activity 7.1: Liquid Spills or Leaks					
EMPr	201 1_7 .1.1	Any incident shall be managed according to the procedure outlined in the flow diagram below. This diagram summarises the PetroSA procedures specified for incident management and oil spill contingency	N	2	PetroSA Incident Management System – Group Procedure (QAL/PR/COR/002, Revision 02, 2017/11/13, authored by M. Mokhothu and approved by G. Vena) aligns well with



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
		management. PetroSA documents should be consulted for more details on procedures and reporting instructions.			the process flow in Figure 1. PetroSA also responds to liquid spills and leaks according to their Oil Spill Contingency Plan. A review of random incident reports confirmed that the defined procedure is being implemented. It is noted that the PetroSA incident procedure does not explicitly require the reporting of liquid spills to the authority as is depicted in the EMPR Figure. However the OSCP provides for the classification of spills based on volume and depending on which Tier the spill falls within, then various authorities are notified. The liquid spill incidents reviewed during this audit (9771; 7172) were reported on in the relevant monthly reports, and incident 7172 was specifically reported to PASA. It is noted however that the Incident Report for these spills does not expressly confirm the volume of liquid spilled and consequently it is uncertain how the classification of spill Tier (in accordance with the OSCP) is being done. As noted in Condition 3.1.8. The incident register records an incident on the 28th December 2024 as 'Oil sheen observed on the North side of the Platform' (#12172). Evidence was provided that this incident was reported to the SAMSA, however no evidence was provided that this environmental incident was reported to the environmental regulator as is required by EMPR condition 7.1.2.
EMPr	201_7.1.2	Liquid Incident Reporting & Management- see Figure 1.	Noted	Noted	
EMPr	201_7.1.3	The incident and the results of the investigation shall form part of The Monthly Report	N	2	Environmental Incidents are included as a reportable item in the monthly reports. It is noted that the <u>results</u> of the incident investigations are not included in the monthly reports.



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
EMPr	201 1_7 .1.4	Check and update the contact details in the oil spill contingency plan every 6 months or on notification by government or other key organisations	N	2	The latest revision on the OSCP is dated February 2023. The scope of the OSCP include, ' FA Platform and associated wells, pipelines and other subsea infrastructure; and any drilling rig contracted by PetroSA operating within petroleum licence Block 9 and 11a'. The FO field, by virtue of it being connected to the FA Platform, falls within the scope of the OSCP. A selection of the contact details provided were checked and verified to be correct. It is suggested that the list be amended to include the National Sea Rescue Emergency number- 087 094 9774.
Activity 7.2: Materials and Equipment Lost Overboard					
EMPr	201 1_7 .2.1	If a solid object falls overboard, the incident shall be managed according to the flow diagram below.	N/A	N/A	No objects dropped overboard were reported on in the monthly reports provided. No dropped objects were recorded in the Incident register.
EMPr	201 1_7 .2.2	See Figure 2.	Noted	Noted	
EMPr	201 1_7 .2.3	Any incidents shall be reported in The Monthly Report.	N/A	N/A	Environmental Incidents are included as a reportable item in the monthly reports. No dropped objects incidents were recorded in the Incident register.
ACTIVITY 8. STAKEHOLDER ENGAGEMENT					
Objectives:					
· To provide regular feedback to the stakeholder forum · To establish and maintain a register of stakeholders · To receive, process and respond to inputs from external and internal stakeholders					
Activity 8.1: Stakeholder Engagement					
EMPr	201 1_8 .1.1	A stakeholder feedback process as detailed in the flow diagram below shall be maintained. See Figure 1.	N	2	No formal stakeholder engagement register or grievance register was available and consequently the stakeholder feedback process as required is not being implemented. The only stakeholder engagement record provided was the onboard radio log. This logs interactions with other vessels in and around the safety zone of the platform.



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
EMPr	201 1_8 .1.2	Any feedback from stakeholders concerning offshore operations shall be reported in The Monthly Report	N/A	N/A	No evidence of stakeholder feedback during the audit period was provided. The monthly report does not include a sub-section on stakeholder feedback. The quarterly report does include a section on Stakeholder Engagement, however this remains unchanged since February 2019.
ACTIVITY 9. ENVIRONMENTAL TRAINING AND AWARENESS Objectives: · To equip all personnel on the platform/ rig etc to perform their duties in an environmentally responsible manner through regular training · To raise environmental awareness through feedback on environmental performance and any changes in legislation of best practices					
Activity 9.1: Environmental Training and Awareness					
EMPr	201 1_9 .1.1	A matrix detailing environmentally related training shall be developed in consultation with the Operations Environmental Leader This shall detail elements of this environmental management plan that are appropriate to each work area on the facility.	Y	4	The environmental training matrix for 2025 was provided. The matrix included the following topics: Waste Segregation, FA Platform Environmental Incident, Lesson learned from previous incidents, and NEMA Section 30. The matrix defines the target audience/ work area. In respect of the current status of the Platform, the key EMPr elements are catered for.
EMPr	201 1_9 .1.2	Toolbox talks shall be used to discuss environmental awareness and to report back on environmental performance applicable to the specific work area.	Y	4	Environmental awareness training and toolbox talks are reported in the monthly SHEQ reports. Toolbox talk topics included in the monthly reports reviewed in the audit included: Litter control, housekeeping, noise, waste management, environmental incidents.
EMPr	201 1_9 .1.3	Deviations of procedure by staff members shall initiate a retraining exercise	N	2	The PetroSA Incident Management System- Group Procedure (PetroSA; 2017) does list 'any deviations from set policies; standards, procedural requirements and specification(non-conformance)' and an incident. Training is also explicitly listed as a corrective action for consideration. A sample of incident reports was reviewed. Incident 4819 noted that toolbox talks (i.e. training) should be undertaken as one of the preventative measure. Incident 7042 which related to a diesel spill as a result of



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
					failure to adhere to procedure, did not include any requirement for further training or toolbox talks.
EMPr	201 1_9 .1.4	Repeated deviations from procedures after retraining shall result in disciplinary procedures being instituted against the offender(s)	N/A	N/A	Instances of repeated deviations from procedures were not specifically identified during the audit.
ACTIVITY 10. SYSTEM ADMINISTRATIVE REQUIREMENTS Objectives: · To provide a comprehensive and coherent system which accesses and stores information pertinent to environmental management from diverse sources to verify responsible environmental practices · To provide a formal platform for reporting on environmental performance · To monitor and audit environmental performance against pre-determined criteria · To use formal management reviews to continuously improve the system itself and thereby environmental performance as a whole.					
Activity 10.1: Monitoring The following parameters shall be monitored:					
EMPr	201 1_1 0.1. 1	Produced water discharge: oil concentration to ensure <40ppm. Section 5.1.2	N	2	Please refer to evaluation presented in condition 5.1. Since November 2022 until the platform ceased generating produced water in 2024 the produced water was directed through the onboard water treatment systems and discharged without pre-emptive testing for oil content. Ad hoc samples were however collected and sent to the onshore testing facilities for retrospective confirmation of oil content.
EMPr	201 1_1 0.1. 2	Produced water discharge: volumes discharged	Y	4	Daily produced water discharge records were provided. During the audit period discharges peaked in July 2015 and gradually tapered off towards February 2024. No discharge volumes have been recorded since February 2024. The field ceased operations in February 2024.
EMPr	201 1_1 0.1. 3	Bilge water discharge: oil concentrations to ensure <15ppm. Section 5.2.2	N	2	Please refer to evaluation presented in condition 5.2. Since November 2022 the drains and bilge water was directed through the onboard water treatment systems and discharged without pre-emptive testing for oil content. Ad hoc samples were however collected and sent to the



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
					onshore testing facilities for retrospective confirmation of oil content.
EMPr	201 1_1 0.1. 4	Flare emissions: Gas volume flared Section 6	Y	4	Please refer to evaluation presented in condition 5.2. Review of random monthly reports notes that the volume of gas flared is not itemised. Flare volumes are however recorded in a separate register. Flaring volumes were recorded and presented from January 2015 to May 2024.
EMPr	201 1_1 0.1. 5	Solid waste production and disposal (refer Section 4.17)	Y	4	Please refer to evaluation presented in condition 4.1. The FA Platform SHEQ monthly reports include a subsection on waste management. The report provides quantities of recyclable, domestic, and hazardous wastes. The monthly report does not report on disposal. The quarterly environmental reports do include copies of the Waste Transfer Notes for the relevant waste streams. These WTN include origin, transporters, and disposal. In addition the Quarterly reports include copies of the disposal/ destruction certificates for the medical waste generated.
EMPr	201 1_1 0.1. 6	Marine biodiversity – colonisation of structures by alien taxa: using existing ROV footage and underwater photography surveys of biological communities on the offshore structures and sections of pipelines to monitor possible development of populations of large (>20 mm) alien species. (Biodiversity Convention).	N	0	The required marine biodiversity monitoring was not undertaken.
EMPr	201 1_1 0.1. 7	Monitoring results shall be retained for 5 years.	Y	4	In instances where monitoring was undertaken, the results thereof were available.
EMPr	201 1_1 0.1. 8	Monitoring results shall be reported in The Monthly Report	N	2	The monthly report on numerous indicators, and specifically: waste generated, produced water, drainage water, incidents, training, and marine observations. It was noted that certain monthly reports did not include monitoring results for deck and bilge water discharges (see item 5.2.4).



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
Activity 10.2: Auditing					
EMPr	201 1_1 0.2. 1	The environmental management plan shall be subject to an internal audit on an annual basis. This constitutes the annual performance report.	N	2	The last annual internal performance assessment report is dated January 2021 and covers the period ending March 2020.
EMPr	201 1_1 0.2. 2	The environmental management plan shall be subject to an external verification audit on a three yearly basis.	N	2	The last external verification audit was undertaken by RMS, dated June 2023. No evidence was provided that the external audit was undertaken for the preceding period. The audit period is not clearly indicated in the RMS report.
EMPr	201 1_1 0.2. 3	The audits shall review and report on the auditing requirements detailed in each section of this management plan	Y	4	Both the internal and external audits include a checklist and compliance evaluation of all of the EMPr requirements.
Activity 10.3: Reporting					
EMPr	201 1_1 0.3. 1	The following reports shall be compiled and submitted (see Figure): - Monthly Internal Report (see figure for content). - Quarterly PASA Report (see figure for content). - Quarterly DEA Report (see figure for content). - Annual Performance Assessment Report (PASA). - Annual PetroSA EXCO Report (see figure for content).	N	2	Monthly SHEQ reports were provided. The content of the monthly reports does not align fully with the stipulated requirements. The latest quarterly PASA Report was reviewed. The content of the quarterly report aligns with the stipulated requirements. Proof of submission of the 2025 quarterly reports to PASA was provided. No evidence of the DEA reports was provided.
Activity 10.4: Record keeping					
EMPr	201 1_1 0.4. 1	All records shall be retained for 5 years.	N	2	Records up to and beyond 5 years were available for certain aspects. For other requirements as listed in 10.4.2 no documentation was available.
EMPr	201 1_1 0.4. 2	The following records shall be maintained as part of the Environmental Management Plan. The records may be filed in another system such as the SHEQ system. The requirements of this Environmental Management Plan are satisfied if the required documents are cross-referenced for auditing purposes. •Effluent discharge volumes	Noted	Noted	



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
		•Effluent discharge quality results •Effluent quality exceedances •ROV imagery of subsea conditions •Water manifests and waste characterisation •Waste production and disposal analyses •Training records •Prosecutions/ notices of non-compliance •Stakeholder inputs and the review thereof •Audit reports •Results of management reviews •Weekly, monthly and annual internal reports •Planned maintenance reports/ logs •All previous EMPs •All EIAs and application for environmental authorisations •Any correspondence with permitting authorities such as PASA, DEA, SAMSA etc •Incident reports • Air quality monitoring			
Activity 10.5: Review and Revision					
EMPr	201 1_1 0.5. 1	The environmental management plan shall be subject to annual review by senior management. 1. The review shall consider the following information: •Monthly monitoring records •Training records •Audit reports •Enforcement records •Feedback from stakeholders •Revisions to system documents 2. The management review shall consider whether: •All significant aspects of and risks to compliance have been identified, documented and assigned performance criteria. • There are any significant aspects of or risks to compliance which are no longer appropriate and can be removed.	N	0	No evidence of EMPr annual review by senior management provided.



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
		- Performance criteria are being met or whether other actions are required. - The Environmental Management Plan as implemented during the preceding year facilitates compliance with its' objectives and legal obligations, and if not what amendments are required			
EMPr	201 1_1 0.5. 2	The review by senior management shall be documented and the document retained for 5 years.	N	0	No documented senior management review was provided.
ACTIVITY 11. DECOMMISSIONING Objectives: · To investigate options for the ultimate fate of all components of the offshore infrastructure in such a way as to cause no significant adverse effects on the marine (or terrestrial) environment while having a proper regard for safety, technical, social (other legitimate uses and users of the sea), and financial costs, and to meet national and international obligations. This so as to be able to schedule and finance contracts for decommissioning, and where necessary and feasible to adjust the operational environmental management programme to make this easier to achieve.					
Activity 11.1: Identification of Decommissioning Strategy					
EMPr	201 1_1 1.1. 1	The process followed to identify reasonable and sensible decommissioning solutions is illustrated in the diagram below.- See Figure.	Y	4	PetroSA has commissioned various studies to identify and cost various decommissioning, rehabilitation and closure strategies. Costs have been estimated to implement the decommissioning, rehabilitation and closure. Risks have been identified and accounted for in associated cost contingencies.
Activity 11.2: Decommissioning Strategy for FA-EM Production Area & Framework for Annual Evaluation and Reporting to PASA.					
EMPr	201 1_1 1.2. 1	Options for decommissioning with estimated (stand-alone) costs, safety, technical feasibility, monitoring and energy use are presented in the table below. These shall be revisited each year as indicated in the flow sheet above. See Table.	Y	4	PetroSA has commissioned various studies to identify and cost various decommissioning, rehabilitation and closure strategies. Costs have been estimated to implement the decommissioning, rehabilitation and closure. Risks have been identified and accounted for in associated cost contingencies.
EMPr	201 1_1	Preferred decommissioning options: Based on the evaluation conducted, the preferred decommissioning options for the infrastructure components of the FA-EM production area	Noted	Noted	



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
	1.2.2	are summarised in the table below. Associated cost estimates are given for which financial provision shall be made by PetroSA; the costs assume that there will be a single mobilisation of marine equipment with the cost for this included with the FA platform jacket. The estimated consolidated cost for decommissioning is ZAR 2,085 million;- See Table.			
EMPr	2011_11.2.3	Decommissioning options including costs shall be updated annually for submission to PASA.	Y	4	The latest determination of the financial provisions required for decommissioning, rehabilitation and closure was done in 2025 (DNV, 2025) and represents a year ending 2024 cost.
Activity 11.3: Financial Provision					
EMPr	2011_11.3.1	PetroSA shall provide for its closure commitments in the form of a liability provision, which is reflected in the balance sheet as the best estimate of the expenditure required to settle the obligation at the projected end of life of the field.	N	2	PetroSA provided the annual financial statements for PetroSA Rehabilitation (Non-Profit Company), which is a company engaged to hold assets on behalf of PetroSA and apply and invest its income, to make distributions for the decommissioning and rehabilitation of oil and gas fields. Based on a review of the available information the estimated decommissioning costs (DNC, 2025) exceed the financial provisions.
EMPr	2011_11.3.2	Reporting of Financial Provision • Proof of Financial Provision will be provided to PASA in the following manner: - o A copy of the insurance certificate for the year will be provided on the renewal date of each year, and - o The annual revision of the closure provision will be submitted together with the annual Performance Assessment reports.	N	2	It is the auditors understanding that the 'insurance' being referred to relates to environmental liability insurance that forms part of the legally required financial provision for remediation and closure. The auditor was provided with an extract of a pollution exclusion clause from what appears to be an insurance policy. This evidence does not specifically provide for the insurance cover related to the Financial Provisions.
Activity 11.4: Application for a Closure Certificate					
EMPr	2011_11.4.1	Detailed engineering specifications shall be developed for decommissioning options	N/A	N/A	Required 12 months prior to cessation of Production- it is expected that this applies to 12 months preceding the relinquishment or closure of the Production Right.



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
EMPr	201 1_1 1.4. 2	A suite of preferred decommissioning options shall be selected based upon environmental and technical considerations.	N/A	N/A	Required 12 months prior to cessation of Production- it is expected that this applies to 12 months preceding the relinquishment or closure of the Production Right.
EMPr	201 1_1 1.4. 3	A detailed environmental impact assessment of the preferred decommissioning option(s) shall be undertaken for application for approval, consistent with the MPRDA and NEMA amongst others.	N/A	N/A	Must occur when preceding conditions are triggered.
EMPr	201 1_1 1.4. 4	A detailed Closure Plan shall be compiled and submitted to PASA.	N/A	N/A	Required 6 months prior to cessation of Production- it is expected that this applies to 6 months preceding the decommissioning activities.
EMPr	201 1_1 1.4. 5	A seabed survey shall be undertaken to validate the Closure Plan	N/A	N/A	Only required post decommissioning.
EMPr	201 1_1 1.4. 6	A detailed environmental risk assessment shall be undertaken for submission for approval and issuance of a Closure Certificate, consistent with the MPRDA. This assessment shall contain at least the following information: • Description and location of all abandoned infrastructure; • Results of seabed survey; • Results of Risk Assessment; and • Any further monitoring requirements.	N/A	N/A	The timing of the applicability of this condition is 180 days post production and is therefore not currently applicable.
EMPr	201 1_1 1.4. 7	Submit a Final Performance Report to PASA including, inter alia: proof of environmental notification and communication with HydroSAN and other users of the sea; and the results of relevant quarterly reports. See Figure.	N/A	N/A	The timing of the applicability of this condition is 180 days post production and is therefore not currently applicable.
EMPr	201 1_1 1.4. 8	Auditing specifications 1. The above steps have been completed 2. The detailed performance criteria of the post decommissioning audit will be detailed in the environmental authorisations.	Noted	Noted	



7.1.2 RECORD OF DECISION

The compliance evaluation of the RoD is provided in Table 2. The conditions were rated according to the compliance evaluation criteria described in 6.2.

Table 2: Compliance evaluation of the relevant RoD conditions.

Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
RECORD OF DECISION: APPROVAL OF ADDENDUM TO THE ENVIRONMENTAL MANAGEMENT PROGRAMME (28/04/2011)					
3.1. Specific Conditions.					
RoD	ROD_3.1.1	The applicant must ensure that all production operations are carried out and managed in accordance with the approved EMPr and this ROD conditions. Deviation from the EMPr and ROD conditions may lead to the cancellation and suspension of production right in terms of section 47(1) of the MPRDA, and any non-compliance must be reported to the Agency.	N	2	Not all operations were carried out in accordance to the EMPr and ROD conditions
RoD	ROD_3.1.2	All waste types generated aboard must be handled and managed in according to the measures and requirements provided for on the EMPr, MARPOL 73/78, 1972 London Convention, Marine Pollution (Prevention of Pollution from Ships) Act, 1986 (Act No. 2 of 1986) and National Environmental Management: Waste Act, 2008 (Act No. 59 of 2008). Furthermore, illegal dumping of waste at sea is prohibited.	Y	4	Waste management is largely carried out in compliance with the requirements of the EMPr- refer to findings in Section 4. The requirements of MARPOL Annex IV are largely addressed in the EMPr, which in respect of waste management can be seen to fulfil the requirement of a waste/ garbage management plan. The London Convention relates to dumping at sea, and does not apply to operational discharges.
RoD	ROD_3.1.3	Ongoing monitoring of the produced and bilge water discharges, gaseous emission from flaring activity, waste generated and disposed of, etc. must be undertaken and results reported to the Agency as part of quarterly and annual EMPr performance assessment reports.	Y	4	Please refer to the findings in Sections 4-6 of the EMPr. Pre-emptive monitoring of bilge and produced water was not undertaken since the online analyser ceased operations. Monitoring was however undertaken retrospectively through the onshore facilities. Records are kept of wastes generated, transferred and disposed of. Gaseous emissions intensity is monitored. Solid waste, effluent discharges and gaseous emissions are



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
					itemised and reported on in the quarterly environmental reports submitted to the PASA.
RoD	ROD_3.1.4	The holder shall at all times keep records of all hazardous waste disposed ashore including safe disposal certificates authenticated by a registered waste disposal site.	N	2	The hazardous wastes generated by the facility are tracked through the facility waste manifest system. Where hazardous wastes are recorded, such are disposed of through licenced waste management facilities (e.g. medical wastes are collected and disposed of by Averda SA at the Vissershock disposal facility (D05751-01)). Other hazardous wastes are collected and transported to the PetroSA Mossel Bay waste facility. The PetroSA landfill is only licenced for storage of hazardous wastes and not disposal. Safe disposal certificates for hazardous waste disposal have not been provided.
RoD	ROD_3.1.5	Blow out prevention equipment on the production wells, and integrity of pipelines must be inspected regularly and inspection results included on the monitoring reports.	N	2	The EMPr requires that inspection schedules should ensure inspection at intervals of no greater than 5 years. The auditee noted that inspections on the subsea infrastructure are undertaken at certain intervals determined using a risk based programme . The Risk Based Sub-sea Inspection Record indicates the following: - FA Platform Jacket critical welds inspection from 0-50m Sea Depth was undertaken in March 2025; - FA Platform Jacket Critical Welds Inspection from 50m to 110m Sea depth was undertaken in March 2025; and - Intelligent Pigging of 8" Export Condensate Pipelines from FA Platform to Refinery was undertaken in March 2024. No other sub-sea inspections were recorded to have taken place in the last 5 years as required by the EMPr. Outstanding inspections apply to the export gas pipeline, sub-sea infrastructure ROV



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
					inspections, and EM Field Buoy. It is noted in the 2015 ROV Survey for FA Satellites and SCG infield infrastructure (MDC; 2015), that certain aspects required attention, e.g. insufficient cathodic protection, damaged and missing piggy back straps. No evidence was provided that these repairs or maintenance tasks were subsequently addressed.
RoD	ROD_3.1.6	The suitability of existing flight paths must be determined to prevent disturbance to marine fauna, seabird and seals' colonies.	Y	4	The flight path during the site inspection did not cross any observable seabird or seal colonies.
RoD	ROD_3.1.7	Flaring of gas is considered a listed activity and a scheduled process in terms of the National Environmental Management Air Quality Act, 2004 (Act No, 39 of 2004), therefore consultation with the Department of Environmental Affairs - Air Quality Directorate must be undertaken to establish the process for obtaining a registration certificate.	N/A	N/A	The platform operates both a high pressure and a low pressure flare system. Activity 2.1 of the activities listed under the NEMAQA lists a trigger threshold of 50MW heat input for combustion installations associated with the petroleum industry. Activity 2.1 is however only applicable to a refinery setting and not a standalone flare for safety control purposes outside of such a setting. It is understood that this ROD requirement stems from the 2010 version of the NEMAQA listed activities which may have applied to the flare, but that such list was subsequently amended in 2013 to restrict the activity to refinery installations. It is the auditors view that this condition is not applicable based on the current legislative requirements.
RoD	ROD_3.1.8	Existing communication channels to inform all other potential marine users of the production well locations, the excluded safety zones, and any activities associated with production of gas and condensate must be maintained by means of Radio Navigation Warnings, notices, and through Existing communication channels to inform all other potential marine users of the production well locations, the excluded safety zones, and any	N	2	A review of the 2025 Annual Summary of South African Notices to Mariners (Notice #5), specifically identifies the FA platform and the associated separation zone. Based on the content of the quarterly reports, it is understood that certain navigational aids for the EM Buoy are no longer functional (including lights, radar beacon, and fog horns). The following navigational aids are however



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
		activities associated with production of gas and condensate must be maintained by means of Radio Navigation Warnings, notices, and through South African Navy Hydrographic Office. Furthermore, an ongoing consultation with I&AP's and other stakeholders including the fishing industry, relevant authorities, NGOs, etc. by means of the existing Agulhas forum must be maintained.			still available and functional, radar signal reflectors, and submarine warning beacon (pinger). SAMSA was informed and the marine navigational warning was distributed by Maritime Radio in Cape Town (Notice 154). The last meeting of the Agulhas Forum was undertaken in February 2019.
RoD	ROD_3.1.9	The operator must annually review the allocated financial provision and submit a revised quantum based on environmental liability and risk assessment in accordance with section 41 (3) of the MPRDA.	Y	4	PetroSA provided the annual financial statements for PetroSA Rehabilitation (Non-Profit Company), which is a company engaged to hold assets on behalf of PetroSA and apply and invest its income, to make distributions for the decommissioning and rehabilitation of oil and gas fields. Based on a review of the available information the estimated decommissioning costs (DNC, 2025) exceed the financial provisions. Proof was provided that the annual financial provisions calculations were submitted to PASA in September 2025.
RoD	ROD_3.1.10	The operator must at all times prevent environmental incidents by developing and reviewing standard operating and emergency preparedness procedures and continuously testing their effectiveness. All environmental incidents must be reported to the Agency within 24 hours of their occurrence and must be addressed with immediate effect. The Agency must be kept informed of the remedial measures taken to manage its closure and prevent recurrence of similar incidence.	N	2	PetroSA does have various standard operating procedures, including a FA Platform Emergency Procedure (PRD/PR/FAP/086)- issued in 2015 and revised in 2021. Drills and muster exercises are included as a sub-section in the Monthly SHEQ reports. Evidence was provided that environmental incidents are recorded on the incident management system and are reported to PASA, albeit not within the specified 24 hours.
RoD	ROD_3.1.11	The decommissioning strategy developed has been noted, however, the operator is required to develop a detailed decommissioning plan 24 months prior to the end of life of the production operations. Furthermore, during decommission stage, infrastructure such as	N/A	N/A	There is no plan to implement decommissioning within the next 24 months.



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
		subsea equipment on the seabed, support structures for floating installations, pipelines with PLEMS/UTAs/riser anchor bases, flow lines and umbilical and wells shall be removed in such a way that there are no significant adverse effects to the marine environment and shall take into account issues pertaining to safety of personnel and other marine users, financial implications, compliance with national and international regulatory obligations, etc.			
3.2. Standard Conditions.					
RoD	ROD_3.2.1	Quarterly environmental monitoring reports and annual EMPr performance assessment reports must be submitted to the Agency.	N	2	The latest quarterly PASA Report was reviewed. The content of the quarterly report aligns with the stipulated requirements. Proof of submission to PASA for the first 3 quarters of 2025 was provided. The last external verification audit was undertaken by RMS, dated June 2023. Proof of submission of this Audit report to the PASA was also provided. The audit period is not clearly indicated in the RMS report. No proof of submission of the last annual (July 2023 to June 2024) performance report was provided.
RoD	ROD_3.2.2	International and South African laws regulating any activities taking place at sea must be adhered to. These include the 1973/1978 International Convention for the Prevention of Pollution from Ships (MARPOL), the 1982 United Nations Convention on Law of the Sea (LOSC); the 1972 Convention on the International Regulations for Preventing Collisions at Sea (COLREGS), National Environmental Management: Air Quality Act 39 of 2004, Marine Living Resources Act 18 of 1998, Sea Birds and Seals Protection Act 46 of 1973, etc.	Noted	Noted	The requirement for an AEL is noted in ROD condition 3.1.7 above. The facility does not have an AEL.
RoD	ROD_3.2.3	In terms of section 43(1), it must be noted that the holder of the right remains responsible for any environmental liability, pollution or ecological	Noted	Noted	This is not an auditable condition



Type	Ref #	Condition	Compliance Y/N	Compliance Rating	Comments/ Verification
		degradation and management thereof, until the Minister has issued a closure certificate.			
RoD	ROD_3.2.4	In case of cancellation, cessation, relinquishment or completion of drilling operations, the applicant is required in terms of section 43(4) to make an application for closure certificate within 180 days of the occurrence of any of the above instances and this must be accompanied by a prescribed environmental risk report as per MPRD Regulation 60.	N/A	N/A	It is understood that the intention of this condition was related to cancellation, cessation, relinquishment or completion of Production [not drilling] operations. This aligns with the requirements of Section 43 of the MPRDA. It is noted that the production facility stopped operating in February 2024. No definitive plans to re-commence production have been provided to the auditor. It is suggested that PetroSA consider the future plans for the facility and production field and either commence with closure or alternatively consider applying for care and maintenance, as is provided for under Regulation 16 of the NEMA Financial Provisioning Regulations.



7.2 FINDINGS OF THE AUDIT

The key findings of the audit are presented in Table 3.

Table 3: Key audit findings.

Finding Ref #	EMPr or ROD ref #	Summary of finding	Recommendations
1	Subsea infrastructure integrity & inspections		
	EMPr: 1.1.1; 1.1.2; 1.1.3; 3.1.5	The FA Platform is not up to date with sub-sea infrastructure inspections and resultant actions.	Review and implement sub-sea inspections and associated actions.
2	Incident management & reporting		
	EMPr: 1.1.4; 7.1.3; 7.1.4 ROD: 3.1.10	Incident management and reporting not fully aligned with the requirements of the EMPr and RoD. Specific reference is made to authority notifications and monthly reporting requirements.	The incident management and reporting system should be aligned with the requirements of the EMPr and RoD, or alternatively the specific conditions or impact management actions amended to align with the current system.
3	Service-provider contractual controls		
	EMPr: 1.2.1.1	Service provider requirement to comply with relevant EMPr conditions are not clearly documented in contracts.	Mechanisms should be defined and implemented to ensure that service providers and contractors has clear understanding of EMPr requirements and are contractually bound thereto.
4	Marine navigation aids, shipping visibility and external stakeholder engagement		
	EMPr: 1.2.2.1; 8.1.1 ROD_3.1.8	Certain vessel and other navigational aids are not functional. The facility doesn't currently have a clear external stakeholder engagement or communication system.	Options for effective external stakeholder communications channels and grievance mechanisms should be explored.
5	Chemical storage and handling		



Finding Ref #	EMPr or ROD ref #	Summary of finding	Recommendations
	EMPr: 3.1.1; 3.1.2; 3.1.3; 3.1.4; 3.1.6	In terms of the chemical storage and handling on the FA Platform, there are some opportunities for improvement. There is a need to align with the register requirements of the EMPr and ensure regular verification of onsite inventories. Expiry dates should be clearly indicated where applicable. Containment and segregation practices are in need of improvement, specifically related to bund management and management of substances used and/or temporarily stored outside of bund areas.	Suggested that the current system is reviewed and revised to align with the EMPr requirements and regular compliance checks carried out.
6	Solid waste management (registers, manifests, storage)		
	EMPr: 4.1.1; 4.1.3; 4.1.5; 4.1.7; 4.1.9; 4.1.14; 4.1.15; 4.1.16; 4.1.17 ROD_3.1.4	No formal annual waste review or waste-reduction targets. No centralized Waste Register detailing sources, classification, disposal methods and precautions. Labelling of wastes prior to containment/storage not fully implemented. Storage protection gaps (some hazardous skip lids open/full; recyclables at risk of being windblown). Some waste manifests incomplete (e.g., missing disposal site receipts). No safe disposal certificates for hazardous wastes. Certain misalignment in relation to record and reporting between the EMPr requirements and the system currently implemented.	Review and revise the current waste management system to align with the EMPr requirements and follow up with regular compliance checks.
7	Effluent (produced and deck/bilge) monitoring and reporting		



Finding Ref #	EMPr or ROD ref #	Summary of finding	Recommendations
	EMPr: 5.1.1; 5.1.2; 5.1.4; 5.1.6; 5.2.1; 5.2.2; 5.2.4; 10.1.1; 10.1.3;	Continuous produced-water and deck water monitoring offline. The current system does not provide for pre-emptive monitoring of discharge quality. Produced-water results are missing from Feb/Mar 2024 Monthly Reports. Deck/bilge discharges above 15 ppm recorded (29 Dec 2024; 17 Feb 2025). Bilge/deck oil concentrations are not consistently reported in Monthly Reports.	The effluent monitoring and discharge control systems need to be adapted to reduce the risk of discharge of contaminated water. The manual discharge monitoring requirements provided for in the EMPr should be implemented.
10	Environmental monitoring, recordkeeping & reporting		
	EMPr: 10.1.6; 10.1.8; 10.4.1; 10.3.1 ROD_3.2.1	Marine biodiversity monitoring (alien taxa colonisation) is not undertaken in accordance with the EMPr requirements. Monitoring results not fully reported in Monthly Reports. Misalignment between EMPr defined reporting requirements and current reporting systems. Submission gaps for quarterly monitoring and annual performance reports to the Agency noted.	Align operational reporting to EMPr requirements or alternatively amend EMPr reporting requirements.
11	Auditing and management review		
	EMPr: 10.2.1; 10.2.2; 10.5.1; 10.5.2	Annual internal audits are not up to date. No annual EMPr management review by senior management evidenced. No documented management review retained.	Align internal and external auditing with EMPr requirements.
12	Financial provision		
	EMPr: 11.3.1; 11.3.2	Financial provision is insufficient relative to updated decommissioning cost estimate.	Align financial provisions with determined quantum.

Where applicable, recommendations presented in Table 3 above to address the key findings have been included in the recommended amendments and changes to the EMPr in Section 7.3.2.



7.3 CONTINUED ADEQUACY OF THE EMPR

The latest approved EMPr provided by PetroSA was evaluated (Lwandle Technologies (Pty) Ltd, February 2010). As per the requirements of Regulation 34(3) of the EIA Regulations (GNR982), the environmental audit report contemplated in sub-regulation (1) must determine- the ability of the EMPr, to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an ongoing basis. The continued adequacy of the EMPr is discussed in this section of the report.

7.3.1 EMPR EVALUATION

The evaluation of the adequacy of the EMPr considers the following:

1. Compliance with the EMPr content requirements defined in Appendix 4 of the EIA Regulations (GNR982);
2. Review of latest compliance audit findings;
3. Review of the authorised activities to confirm that all relevant impacts have been identified and adequately assessed, and that relevant impact management outcomes and actions are adequate.
4. Review of the EMPr to confirm adequate measures to ensure compliance with the provisions of the EMPr.

The remaining sub-sections present the evaluation and consequent recommendations.

7.3.1.1 COMPLIANCE WITH NEMA EMPR REQUIREMENTS

Appendix 4 of the NEMA EIA Regulations provides for the requirements of an EMPr in compliance with Section 24N of the NEMA. Table 4 below provides a breakdown of the prescribed requirements, an evaluation of compliance with the current EMPr, and recommendations to address shortcomings. Note that this evaluation aims to check whether the prescript of the regulations are included in the current EMPr and does not aim to evaluate the completeness or adequacy thereof. The adequacy of the EMPr impact management outcomes and actions are evaluated in Section 7.3.1.3.

Table 4: NEMA EIA Regulations Appendix 4 Evaluation.

Requirement		Evaluation	Recommendations
NEMA Regulation 982 (2014) Appendix 4			
Appendix 4(1)(a):	Details of – i. The EAP who prepared the EMPr; and ii. The expertise of that EAP to prepare an EMPr, including a curriculum vitae;	Included in Cover page	None
Appendix 4(1)(b):	A detailed description of the aspects of the activity that are covered by the EMPr as identified by the project description;	Included in Section 1.4 and 2	None
Appendix 4(1)(c):	A map at an appropriate scale which superimposes the proposed activity, its associated structures, and infrastructure on the environmental sensitivities of the preferred site, indicating any areas that should be avoided, including buffers;	Partially included in Section 2.	Suggested that a map be provided of regional marine protected areas and critical habitats as defined in the National Marine Spatial Biodiversity Plan.



Requirement	Evaluation	Recommendations
Appendix 4(1)(1)(d): A description of the impact management outcomes, including management statements, identifying the impacts and risks that need to be avoided, managed and mitigated as identified through the environmental impact assessment process for all phases of the development including – i. Planning and design; ii. Pre-construction activities; iii. Construction activities; iv. Rehabilitation of the environment after construction and where applicable post closure; and v. Where relevant, operation activities;	Included in section 3. Noted that the EMPr doesn't address any new construction or drilling activities.	None
Appendix 4(1)(1)(f): A description of proposed impact management actions, identifying the manner in which the impact management outcomes contemplated in paragraphs (d) will be achieved, and must, where applicable, include actions to – i. Avoid, modify, remedy, control or stop any action, activity or process which causes pollution or environmental degradation; ii. Comply with any prescribed environmental management standards or practices; iii. Comply with any applicable provisions of the act regarding closure, where applicable; and iv. Comply with any provisions of the Act regarding financial provisions for rehabilitation, where applicable.	Included in section 3. Noted that the EMPr doesn't address any new construction or drilling activities. It is noted that in some cases the impact management actions do not reflect current legislative updates.	Review and update relevant Impact Management Actions in relation to updated legislative requirements.
Appendix 4(1)(1)(g): The method of monitoring the implementation of the impact management actions contemplated in paragraph (f);	Each activity under Section 3 provides guidance on auditing compliance. Section 10.2 and 10.3 provides for auditing and reporting respectively.	The auditing requirements in the EMPr should be amended to reflect the NEMA Regulation 34 requirements and associated transitional provisions as well as the



Requirement		Evaluation	Recommendations
			relevant amendments to the MPRDA.
Appendix 4(1)(1)(h):	The frequency of monitoring the implementation of the impact management actions contemplated in paragraph (f);	Frequencies for monitoring are included in the relevant sections of the EMPr	None
Appendix 4(1)(1)(i):	An indication of the persons who will be responsible for the implementation of the impact management actions.	Responsibilities for implementation are included in the relevant sections of the EMPr	None
Appendix 4(1)(1)(j):	The time periods within which the impact management actions contemplated in paragraph (f) must be implemented;	Time periods are provided for the relevant management actions	None
Appendix 4(1)(1)(k):	The mechanism for monitoring compliance with the impact management actions contemplated in paragraph (f);	Each activity under Section 3 provides guidance on auditing compliance. Section 10.2 and 10.3 provides for auditing and reporting respectively.	The auditing requirements in the EMPr should be amended to reflect the NEMA Regulation 34 requirements and associated transitional provisions as well as the relevant amendments to the MPRDA.
Appendix 4(1)(1)(l):	A program for reporting on compliance, taking into account the requirements as prescribed by the Regulations;	Activity 10.3 in Section 3 provides for reporting requirements.	None
Appendix 4(1)(1)(m):	An environmental awareness plan describing the manner in which – i. The applicant intends to inform his or her employees of any environmental risk which may result from their work; and ii. Risks must be dealt with in order to avoid pollution or the degradation of the environment; and	Included in Activity 9 of Section 3 of the EMPr.	None
Appendix 4(1)(1)(n):	Any specific information that may be required by the competent authority.	It is noted that the conditions of the RoD are not explicitly captured in the EMPr. These are however audited independently and therefore do not	None



Requirement	Evaluation	Recommendations
	need to be included in the EMPr.	

7.3.1.2 AUDIT FINDINGS AND RECOMMENDATIONS

The audit findings and relevant recommendations are presented in Section 7.2. The following are specifically noted in relation to the EMPr:

- A review of the legislative references in the EMPr need to be undertaken to update the EMPr to align with current legal requirements;
- A review of the reporting requirements of the EMPr should be undertaken to align with the current operational procedures (including reporting scope and frequency).
- Where compliance with the EMPr is not reasonable or practical based on current operations, these requirements should be amended to align. Care must be undertaken to ensure that defined impact management outcomes and objectives are still achieved.

7.3.1.3 ADEQUACY OF IMPACT MANAGEMENT

An evaluation of the current EMPr, and the ability of the measures contained in the EMPr to sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity was undertake. The approach taken included:

- Consideration of the impacts identified and presented in the EMPr, and to determine whether any additional impacts and associated management outcomes and actions should be included.
- Consideration of the current impact management actions, their adequacy and potential changes to align with good international industry practice (GIIP).

It is the opinion of the auditor that in general, the EMPr is relevant and applicable to the activities and the associated impacts and risks. It is however the auditors opinion that certain activities and associated impacts are not sufficiently provided for and should be supplemented. These are detailed in Table 5. The holder must consider these shortcomings when submitting recommendations to amend the EMPr.

Table 5: Identified shortcomings.

EMPr Section	Comments	Recommendations
7.1.4.	Condition 7.1.4 of the EMPr requires the regular update of the contact details of the OSCP. This condition does not speak to the content or revision of the remainder of the OSCP. The OSCP provided is in draft form and is outdated. This plan also relies on the oil spill drift modelling that was done for the E-BK wellfield. The E-BK wellfield is located further offshore than the FA Platform and associated well fields, and in the opinion of the auditor is not representative for the prediction of oil or condensate fate and relevant environmental impacts for a number of spills	It is suggested that a condition is added to the EMPr which requires that the OSCP aligns with South Africa's National Contingency Plan, as well as other relevant legal requirements. It is recommended that PetroSA engage the relevant authorities (including SAMSA, DFFE, and PASA), and / or a suitably qualified and independent marine ecology specialist to determine the need for a updated oil spill drift model.



EMPr Section	Comments	Recommendations
	simulations (including worst-case scenario, such as blowout from a well). Consideration should be given to reviewing the risk assessment component of the OSCP and if necessary, providing a more relevant and up to date Oil Spill drift model to inform the risk assessment and associated response strategies. Further the EMPr currently doesn't require approval of the OSCP.	
Activity 2	The current EMPr does not address the potential risks associated with bunkering of fuels. The FA Platform currently receives fuel via transfers from shore.	It is suggested that a sub-section is added to Activity 2 of the EMPr which addresses the risks associated with bunkering of fuel for the FA Platform and other support services. This should be aligned with the requirements of the recently published Regulations for the Environmental Management of Offshore Ship-To-Ship Transfers (GNR 6551, 2025), promulgated under the NEM: ICMA, if applicable.
Activity 6	The current EMPr does not address the release of Greenhouse Gases from the FA Platform and associated sub-sea infrastructure and well fields. Greenhouse Gases have been declared as priority pollutants (GN710, 2017). The National greenhouse Gas Reporting Regulations identify persons who are required to report on GHG emissions. Fugitive emissions from oil and natural gas installations are identified as data provider and need to report on these emissions.	Address the monitoring, control and reporting of GHG emissions from the FA Platform and associated infrastructure. Reference should be made to the legal GHG reporting obligations, as well as identifying opportunities for reduction of GHG emission. Such measures could include avoiding continuous venting or flaring, use of high efficiency flares, and implementing a leak detection and repair system.
Sections 2 and 3	It is noted that the current FA Platform and associated wellfields (FA/EM/ FA-Satellite) is not in operation and the wells have been shut-in. Whilst the current EMPr does provide impact management outcomes or actions pertaining to the operations of the FA Platform and associated wells and sub-sea infrastructure, the risks associated with operational phase workovers or well interventions are not specifically identified. Key risks and considerations for well workovers or intervention could include: Well barrier verification and acceptance criteria for specific subsea interventions, to avoid unintended releases;	In the event that interventions / well workovers are likely to be undertaken in the FA, FA-Satellite, or EM wellfields, it is suggested that explicit provision and control for these activities be addressed in the EMPr. Specific consideration should be given to the following: - Scope and activities: define intervention or workover types and update EMPr activity descriptions. - Barrier management: pre-emptive verification of existing barrier integrity.



EMPr Section	Comments	Recommendations
	• Management of workover/completion fluids, flowback and returns to prevent or minimize discharges to sea; and • Workover or intervention-specific monitoring, reporting and per-well environmental close-out.	• Fluids/returns: mechanisms to manage and dispose of fluids. • Well control- including blowouts and necessary infrastructures and controls (e.g. BOP's). • Seabed integrity: pre-/post-job ROV surveys. • Navigational warnings and notices. • Monitoring and reporting.
Sections 3 and 10	Condition 3.2.1 of the RoD states: “....annual EMPr performance assessment reports must be submitted to the Agency”. Condition 10.2.2. of the EMPr states: “The environmental management plan shall be subject to an external verification audit on a three yearly basis.”. Condition 10.3.1 of the EMPr includes a diagram outlining the reporting requirements. This diagram includes the requirement for annual performance assessment reports to be submitted to PASA. Both the ROD and the EMPr require annual Performance Assessments. It is the opinion of the auditor, that there is a current obligation on PetroSA to undertake a NEMA Regulation 34 Audit (independent) on an annual basis, aligned with the stipulated performance assessment cycle. This would however be misaligned with Condition 10.2.2 of the EMPr.	The competent authority should be engaged to confirm whether the NEMA Regulation 34 Audits should be undertaken on an annual basis or every third year.

7.3.1.4 ADEQUACY OF COMPLIANCE MECHANISMS

It is necessary to evaluate the ability of the EMPr to ensure compliance with the provisions of EMPr. The EMPr provides clear mechanisms for reporting and auditing, including annual internal and external audits. It is however noted that some of the reporting requirements in the EMPr need to be reviewed/ rephrased as they still refer to ‘performance assessments’ and reporting to the DEA. The MPRDA requirements for Performance Assessments have been repealed and the DEA (now DFFE) is no longer the relevant competent authority for environmental matters associated with offshore production.

7.3.2 EMPr SHORTCOMINGS AND RECOMMENDATIONS

It is the auditors opinion that the 2010 EMPr does, in large part, sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an



ongoing basis. However, certain shortcomings have been identified in the preceding sections of this audit report which should be amended. It is the auditors suggestion that the holder should consider the findings of this audit and prepare recommendations for amendment to the EMPr, as provided for in Regulation 34 (4) of the EIA Regulations. Such recommendations must be subjected to a public participation process together with the amended EMPr.

8 CONCLUSION

EIMS was appointed to undertake the Environmental Audit to assess compliance with the conditions of the 2011 RoD and associated EMPr (Lwandle Technologies (Pty) Ltd, 2010). A straight compliance of 37% and a weighted compliance of 63% was achieved against the requirements of the EMPr. A straight compliance of 40% and a weighted compliance of 70% was achieved against the requirements of the RoD.

It is the auditors opinion that the 2010 EMPr does, in large part, sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an ongoing basis. However, certain shortcomings have been identified in the preceding sections of this audit report which should be amended.

PetroSA is reminded of the requirements of Regulations 34 of the EIA Regulations, 2014 with regards to findings of the adequacy of the EMPr and access to the audit report. Regulation 34 states:

- 4) *“Where the findings of the environmental audit report contemplated in sub-regulation (1) indicate-*
- a) insufficient mitigation of environmental impacts associated with the undertaking of the activity; or*
 - b) insufficient levels of compliance with the environmental authorisation or EMPr and, where applicable the closure plan;*
- the holder must, when submitting the environmental audit report to the competent authority in terms of sub-regulation (1), submit recommendations to amend the EMPr or closure plan in order to rectify the shortcomings identified in the environmental audit report.*
- 5) *When submitting recommendations in terms of sub-regulation (4), such recommendations must have been subjected to a public participation process, which process has been agreed to by the competent authority and was appropriate to bring the proposed amendment of the EMPr and, where applicable the closure plan, to the attention of potential and registered interested and affected parties, including organs of state which have jurisdiction in respect of any aspect of the relevant activity and the competent authority, for approval by the competent authority.*
- 6) *Within 7 days of the date of submission of an environmental audit report to the competent authority, the holder of an environmental authorisation must notify all potential and registered interested and affected parties of the submission of that report, and make such report immediately available-*
- a) to anyone on request; and*
 - b) on a publicly accessible website, where the holder has such a website.”*

9 ASSUMPTIONS, LIMITATIONS AND GAPS IN KNOWLEDGE

The following assumptions, limitations and gaps in knowledge apply to the audit:

- The information contained in this report was sourced from information and data supplied by third parties that is assumed to be complete, valid and true.
- This report is based on information available at the time of the assessment. The information, data, observations and evidence on what this report is based is beyond the control of EIMS and may change without notice. EIMS will not be liable for any loss or damage which may arise directly or indirectly because of such changes.



- Where reference is made to legislation or other statutory provisions in this report the original legislation or other statutory provisions will always take precedence, and the reader is directed to revert to the original legislation or statutes.
- The audit was limited to the 2010 EMPr (Lwandle Technologies (Pty) Ltd, 2010) and the 2011 RoD (Petroleum Agency South Africa, 2011). The audit only considered compliance and EMPr adequacy in respect of current activities (i.e. care and maintenance/ operations).
- The audit covers a 10-year period, which limits the feasibility of a fully comprehensive review of all activities and records. Findings are based on documentation provided by the facility, assessed on a sampled basis. The site inspection was conducted recently, and any observations informing this audit reflect current conditions only and may not represent historical site circumstances. All findings and recommendations should therefore be interpreted in light of these constraints.
- A comprehensive legal compliance audit is beyond the scope of this audit.

10 REFERENCE LIST

Lwandle Technologies (Pty) Ltd. (2010, February). Environmental Management Programme for the FA-EM Production Area.

Petroleum Agency South Africa. (2011, May 6). Approval of Addendum to the environmental management programme (EMPR) in terms of the requirements of the Minerals and Petroleum Resources Development Act, 2002 (Act no28 of 2002). . Cape Town, South Africa.