



The Petroleum Oil and Gas Corporation
Of South Africa (SOC) Ltd
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Petroleum Agency of South Africa (PASA)

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**RECOMMENDATIONS TO AMEND THE ENVIRONMENTAL MANAGEMENT PROGRAMMES (EMPR)
FOLLOWING AN INDEPENDENT COMPLIANCE AUDIT (NEMA EIA REGULATIONS, 2014 –
REGULATION 34)**

1. Background and purpose of this notice

The Petroleum Oil and Gas Corporation of South Africa SOC Ltd (PetroSA), is the holder of the following offshore petroleum Production Rights:

- FA_EM Gas Field and FA Satellites (PASA ref 12/4/1/05/2/2/2)
- FO Gas Field (PASA ref 12/4/08)
- Oribi / Oryx Oil Field (PASA ref 12/4/1106/2/2/2)

Directors:

Interim Chairman: Mr Tembinkosi Bonakele;
Ms Brenda Moagi; Mr Llewellyn Delport; Ms Ditsietsi Morabe
Group Chief Executive Officer (acting): Ms Nombulelo Tyandela
Group Chief Financial Officer (acting): Mr Linda Nene
Group Company Secretary: Ms Marlene Khumalo

- South Coast Gas Field (DEA ref 12/12/20/719)

Each of these Rights have approved Environmental Management Programmes (EMPr's). PetroSA appointed an independent auditor to undertake environmental compliance audits of the EA's/ RoD's and EMPrs in accordance with Regulation 34 of the EIA Regulations (GNR983) promulgated under the National Environmental Management Act (Act 107 of 1998-NEMA).

As per the requirements of Regulation 34(3) of the EIA Regulations, 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 audits undertaken have identified specific shortcomings that should be addressed through amendments and/or additions to the respective EMPr's.

2. Summary of key shortcomings identified and recommendations

Error! Reference source not found. provides a summary of the identified shortcomings as well as PetroSA's recommendations to address these in amended EMPr's.

Table 1: Audit identifies shortcomings and recommendations

Shortcomings identified	Applicable Production Right and EMPr condition	Recommendations	Amended/Additional condition of the EMPr
<p>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.</p> <p>The OSCP provided is in draft form and is outdated.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 simulations (including worst-case scenario, such as blowout from a well).</p> <p>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.</p> <p>Further the EMPr currently doesn't require approval of the OSCP</p>	<p>FA-EM – Condition 7.1.4</p> <p>FO – Condition 5.7.1.4</p> <p>Oribi Oryx – Condition 7.1.4</p> <p>SCG – Condition 3.4</p>	<p>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.</p> <p>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 an updated oil spill drift model.</p> <p>This has been addressed in the EMPr.</p>	<p><i>(Amendment)</i> The plan should be aligned to the National Oil Spill Contingency Plan (NOSCP) and updated every five years or sooner if significant changes occur, such as new developments, or emergency incidents that alter the risk of marine pollution. Check and update the contact details in the OSCP every 6 months or on notification by government or other key organisations.</p>
<p>The current EMPr does not address the potential risks associated with bunkering of fuels. The FA Platform currently receives fuel via transfers from shore.</p>	<p>FA-EM – Condition 3.1.10 and 11</p> <p>Oribi Oryx – Condition 3.1.10 and 3.1.11</p>	<p>It is suggested that a sub-section is added of the EMPr which addresses the risks associated with bunkering of fuel for the FA Platform and other support services.</p>	<p><i>(Addition)</i> Offshore bunkering will not be allowed to take place in the following circumstances:</p> <ul style="list-style-type: none"> -Wind force and sea state conditions of >24 knots mean wind speed, >4m wave height, -During any workboat or mobilisation boat operations,

		<p>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.</p>	<p>-During helicopter operations, -During the transfer of in-sea equipment, and -At night or times of low visibility.</p> <p><i>(Addition)</i> Floating hoses should be utilised for bunkering chemicals which could potentially contaminate the marine environment. These will be made of flexible double carcass sections and will be equipped with a breakaway coupling for protection against excessive tension or overpressures in the fuel system. The closure time will be set to minimise the volume of oil spilled to the sea whilst being slow enough to prevent surge pressure building up. Hoses will also be fitted with high visibility markers and will have built-in buoyancy with a minimum reserve of 25% (to cope with a situation where the hose becomes filled with seawater and immersed). This will also prevent accidental damage to unseen hoses by supply vessels</p>
<p>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).</p> <p>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.</p>	<p>FA_EM – Condition 6.1.5 FO – Condition 5.6.1.5 Oribi Oryx – Condition 6.1.5 SCG – Part 2C</p>	<p>Address the monitoring, control and reporting of GHG emissions from the FA Platform and associated infrastructure.</p> <p>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.</p>	<p><i>(Addition)</i> Greenhouse gas emissions must be reported in accordance with the requirements of the National Greenhouse Gas Reporting Regulations, published under the National Environmental Management: Air Quality Act.</p>

<p>It is noted that the current wellfield is not in operation and the wells have been shut-in. Whilst the current EMPr does provide impact management outcomes or actions, the risks associated with operational phase workovers or well interventions are not specifically identified.</p> <p>Key risks and considerations for well workovers or intervention could include:</p> <ul style="list-style-type: none"> • Well barrier verification and acceptance criteria for specific subsea interventions, to avoid unintended releases; • 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. 	<p>FA_EM – Condition 1.1.5</p> <p>FO – Condition 5.1.1.5</p> <p>Oribi Oryx – Condition 1.1.5</p> <p>SCG – Part 2C Condition 3.12</p>	<p>In the event that interventions / well workovers are likely to be undertaken in the applicable 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:</p> <ul style="list-style-type: none"> • Scope and activities: define intervention or workover types and update EMPr activity descriptions. • Barrier management: pre-emptive verification of existing barrier integrity. • 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. 	<p><i>(Addition)</i> Ensure that all well interventions and workovers at wellfields are planned and executed under approved procedures that include defined activity scope, updated risk assessments, verified well barriers, controlled management and disposal of fluids, certified well control equipment (including BOPs), pre- and post-operation ROV seabed surveys, issued navigational notices, and documented environmental monitoring and reporting.</p>
<p>In general, the ROD/EA's and the EMPr require annual Performance Assessments.</p> <p>The FA_EM EMPr Condition 10.2.2. states: "The environmental management plan shall be subject to an external verification audit on a three yearly basis."</p> <p>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.</p>	<p>FA_EM – Condition 10.2.2, 10.3.1</p> <p>FO – Condition 5.10.2.1, 5.10.2.2, 10.3.1</p> <p>Oribi Oryx Condition 10.2.2, 10.3.1</p>	<p>PetroSA recommends conducting a performance assessment internally on an annual basis and conducting an external verification audit, which aligns to the Regulation 34 Audit, on a three yearly basis.</p> <p>The competent authority should be engaged to confirm whether the NEMA Regulation 34 Audits should be</p>	<p><i>(No amendment/addition)</i></p>

The SCG EMPr and ROD do not include any details regarding the frequency of external audits or Performance Assessments.		undertaken on an annual basis, biannually, or every third year.	
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3. Way forward

Regulation 34(4)–(5) requires that where an audit indicates insufficient mitigation of impacts and/or insufficient compliance, the holder must submit recommendations to amend the EMPr (and where applicable) to rectify the shortcomings. Such recommendations must be subjected to a public participation process to bring the proposed amendments to the attention of potential and registered I&APs, including relevant organs of state.

In accordance with Regulation 34, PetroSA has amended the Applicable EMPr's and made these documents available for public review and comment. All comments received during the public review period will be recorded and considered. These comments and responses will be compiled and submitted to the competent authority together with the audit reports, these recommendations, and the amended EMPr's for consideration and decision making.

4. Closing

PetroSA recognises the importance of transparent environmental governance and meaningful public participation. The proposed amendments are intended to strengthen the EMPr, address the shortcomings identified by the independent audit, and ensure that environmental risks associated with offshore operations are appropriately managed.

We thank you for taking the time to review the documentation and provide input.

Yours sincerely;

Ms Vuyokazi Godongwana
(Acting) General Manager: Upstream

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