

Audit of EMPr for Block 2C, Exploration Right 12/3/248 off the West Coast of South Africa

External Environmental Compliance Audit Report of
the Environmental Management Programme (EMPr),
in accordance with Regulation 34 of the EIA
Regulations (2014) as amended

August 2023

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REPORT DETAILS

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Title	: PetroSA Regulation 34 Audit of EMPR for Block 2C (Exploration Right 12/3/248 and EMPr Revision 01 (April 2013)), off the West Coast of South Africa
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Internal Review	Danie Brummer Jo-Anne Thomas
Client	: Petroleum Oil and Gas Corporation of South Africa (SOC) Ltd (PetroSA)
Report Revision	: Final
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DECLARATION OF INTEREST

I, PD Brummer, declare that:

- » I act as the independent environmental auditor for the environmental compliance audit (August 2023).
- » I have performed the work relating to the audit in an objective manner, even if this results in views and findings that are not favourable to the applicant.
- » I declare that there are no circumstances that may compromise my objectivity in performing such work.
- » I have expertise in conducting independent environmental audits, including knowledge of NEMA, the 2014 EIA Regulations (GNR 326) and any guidelines that have relevance to the activity.
- » I have complied with NEMA, the 2014 EIA Regulations (GNR 326) and all other applicable legislation.
- » I have no, and have not engaged in, conflicting interests in the undertaking of the audit.
- » I have undertaken to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have the potential of influencing – any decision to be taken with respect to the project by the competent authority; and – the objectivity of any report, plan or document prepared by myself for submission to the competent authority.
- » All the particulars furnished by me in this report are true and correct.
- » I realise that a false declaration is an offence in terms of Regulation 48 and is punishable in terms of section 24F of the Act.
- » I do not have and will not have any vested interest (either business, financial, personal or other) in the project other than remuneration for work performed.

PD Brummer

Name

August 2023

Date

ACRONYMS AND ABBREVIATIONS

CAA	Civil Aviation Authority
DEA	Department of Environmental Affairs (National)
DMR	Department of Mineral Resources
EA	Environmental Authorisation
EAP	Environmental Assessment Practitioner
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMPr	Environmental Management Programme
GHG	Greenhouse Gas
GIIP	Good International Industry Practise
I&AP	Interested and Affected Party
IPP	Independent Power Producer
MMO	Marine Mammal Observer
MW	Megawatts
NEMA	National Environmental Management Act (No. 107 of 1998)
NEM:BA	National Environmental Management: Biodiversity Act (No. 10 of 2004)
NHRA	National Heritage Resources Act (No. 25 of 1999)
O&M	Operations and Maintenance
OEMPr	Operational Environmental Management Programme
OHS	Occupational Health and Safety
PAM	Passive Acoustic Monitoring
PetroSA	Petroleum Oil and Gas Corporation of South Africa (SOC) Ltd
SAHRA	South African Heritage Resources Agency

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1. INTRODUCTION AND BACKGROUND

Savannah Environmental (Pty) Ltd has been appointed by Petroleum Oil and Gas Corporation of South Africa (SOC) Ltd (PetroSA) to undertake an external environmental compliance audit and prepare an external environmental compliance audit report in accordance with the requirements of Regulation 34 of the EIA Regulations, 2014, as amended, for the Exploration and geophysical surveys in Licence Block 2C, Project name: PetroSA Regulation 34 Audit of EMPR for Block 2C located off the West Coast of South Africa. The external environmental compliance audit was conducted to demonstrate PetroSA's compliance with the EMPr applicable to the project as detailed in Section 6 of this report.

1.1. Project Background

The Petroleum Oil and Gas Corporation of South Africa (SOC) Ltd (PetroSA) is the operator of an Exploration

Point	Latitude (S)	Longitude (E)	Point	Latitude (S)	Longitude (E)
1	30° 00' 01.4127"	14° 41' 56.4251"	11	30° 53' 01.2799"	15° 38' 56.5661"
2	30° 00' 01.3247"	15° 11' 56.5226"	12	30° 53' 01.2745"	15° 43' 56.5844"
3	30° 14' 01.3005"	15° 11' 56.5025"	13	31° 00' 01.2687"	15° 43' 56.6100"
4	30° 14' 01.2840"	15° 16' 56.5139"	14	31° 00' 01.2941"	15° 24' 56.5466"
5	30° 22' 01.2756"	15° 16' 56.4984"	15	30° 52' 01.2932"	15° 24' 56.5245"
6	30° 22' 01.2469"	15° 26' 56.5154"	16	30° 52' 01.3125"	15° 02' 56.4834"
7	30° 31' 01.2592"	15° 26' 56.5060"	17	30° 42' 01.3073"	15° 02' 56.4684"
8	30° 31' 01.2544"	15° 29' 56.5127"	18	30° 42' 01.3245"	14° 54' 56.4598"
9	30° 43' 01.2771"	15° 29' 56.5179"	19	30° 40' 01.3581"	14° 54' 56.4591"
10	30° 43' 01.2677"	15° 38' 56.5424"	20	30° 40' 01.3581"	14° 41' 56.4410"

Right to undertake exploration and geophysical surveys in Block 2C off the West Coast of South Africa. Block 2C is situated off the West Coast of South Africa in the Orange Basin roughly 200 km offshore of the Northern Cape. Block 2C is a 6 223.74 km² license block located off the West Coast of South Africa in water depths ranging from 300 m to about 1500 m. The co-ordinates of Block 2C are indicated in **Figure 1.1** and **Figure 1.2**.

Figure 1.1: Co-ordinates of the proposed Exploration Right Area (Block 2C)

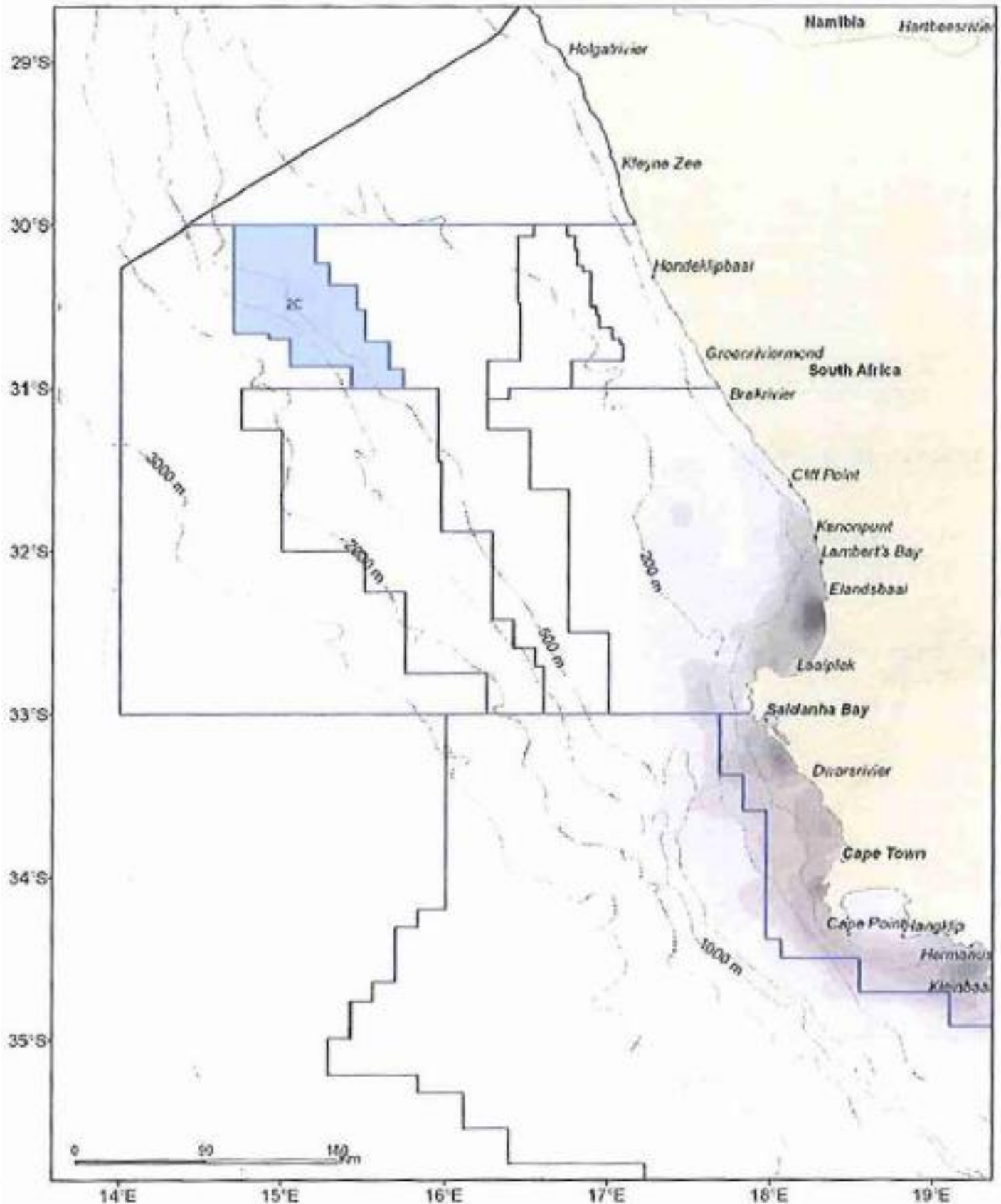


Figure 1.2: Spatial distribution of the catch (2001 to 2009) by the purse-seine fishery in South African waters in relation to Block 2C.

2. OBJECTIVE OF THE AUDIT

The objective of this environmental audit as contained in Appendix 7 of the 2014 Environmental Impact Assessment (EIA) Regulations (GNR 326) and Regulation 34 is to:

- » Report on:
 - * The level of compliance with the conditions of the EMPr.
 - * The extent to which the avoidance, management and mitigation measures provided for in the EMPr, achieve the objectives and outcomes of the EMPr.
- » Identify and assess any new impacts and risks as a result of undertaking the activity.
- » Evaluate the effectiveness of the EMPr.
- » Identify shortcomings in the EMPr.
- » Identify the need for any changes to the avoidance, management and mitigation measures provided for in the EMPr.

This Environmental Audit Report has been prepared in accordance with Appendix 7 of the 2014 EIA Regulations (GNR 326). An overview of the contents of the Environmental Compliance Audit Report, as prescribed by Appendix 7 of the 2014 EIA Regulations (GNR 326), and where the corresponding information can be found within the report is provided in **Table 1**.

Table 1: Summary of where the requirements of Appendix 7 of the 2014 EIA Regulations (GNR 326) are provided in this Environmental Compliance Audit Report

Requirement	Location in Report
(a) Details of the – <ul style="list-style-type: none"> (i) Independent person who prepared the environmental audit report. (ii) Expertise of the independent person that compiled the environmental audit report. 	Refer to Section 4 Refer to Appendix A
(b) A declaration that the independent auditor is independent in a form as may be specified by the competent authority.	Refer to Declaration of Interest Refer to Section 4
(c) An indication of the scope of, and the purpose for which, the environmental audit report was prepared.	Refer to Section 3
(d) A description of the methodology adopted in preparing the environmental audit report.	Refer to Section 6
(e) An indication of the ability of the EMPr, and where applicable, the closure plan to – <ul style="list-style-type: none"> (i) Sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on-going basis. (ii) Sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility. (iii) Ensure compliance with the provisions of environmental authorisation, EMPr, and where applicable, the closure plan. 	Refer to Section 10
(f) A description of any assumptions made, and any uncertainties or gaps in knowledge.	Refer to Section 5
(g) A description of any consultation process that was undertaken during the course of carrying out the environmental audit report.	Refer to Section 6
(h) A summary and copies of any comments that were received during any consultation process.	Refer to Section 6

Requirement	Location in Report
(i) Any other information requested by the competent authority.	N/A

3. PURPOSE AND SCOPE

This Environmental Audit has been conducted to determine PetroSA's compliance with applicable environmental management requirements, as per the requirements of Regulation 34 of the EIA Regulations, 2014 as amended (GNR 326). The scope of the Environmental Audit is confined to an assessment of those environmental management requirements contained within the project EMPr for the offshore operations at Block 2C in the West Coast of South Africa.

4. OVERVIEW OF THE INDEPENDENT ENVIRONMENTAL AUDITORS

This independent environmental compliance audit was however undertaken by Danie Brummer and Carina de Ornelas (refer to **Table 2**), and reviewed by Jo-Anne Thomas (refer to **Table 3**).

Table 2: Details of the Independent Environmental Auditors for this Section 34 audit report.

	Danie Brummer	Carina de Ornelas
Position:	Compliance and Assurance Manager	Environmental Consultant
Company:	Savannah Environmental (Pty) Ltd	Savannah Environmental (Pty) Ltd
Qualification:	M.Sc. Environmental Science and Management	BA. Degree (Major in Geography) Environmental Management
Professional Registration:	Professional Natural Scientist (400166/11) (SACNASP) EAPASA (2020/1426)	
Experience:	16 years	1 Year
Contact:	011 656 3237	011 656 3237
Email:	danie@savannahsa.com	carina@savannahsa.com

Table 3: Details of the Report Reviewer.

Name:	Jo-Anne Thomas
Position:	Project Manager and Director
Company:	Savannah Environmental (Pty) Ltd
Qualification:	M.Sc. Botany
Professional Registration:	Professional Natural Scientist (400024/2000) (SACNASP)
Experience:	25 years
Contact:	011 656 3237
Email:	joanne@savannahsa.com

A signed Declaration of Interest confirming the auditors' independence is included in this Environmental Audit Report. CVs of the Independent Environmental Auditor and Report Reviewer are attached as **Appendix A** to this report.

5. ASSUMPTIONS AND LIMITATIONS

The following assumptions and limitations are applicable to this Environmental Audit Report:

- » It is assumed that the information provided during the desktop audit was accurate and true at the time of conducting the desktop audit.

6. APPROACH TO CONDUCTING THE AUDIT

6.1. Pre-audit planning

Prior to undertaking the audit, the scope and objectives of the audit were determined through a review of relevant information applicable to the project.

Following the review of existing information, an audit checklist was prepared for use as a tool during the audit to identify any issues of non-compliance and / or areas where action plans may be required to be implemented to address any identified issues of concern.

The audit checklist was prepared based on the licensing and management specifications contained within the following documentation:

- » Operation Environmental Management Programme (EMPr) for the offshore operations at Block 2C in the West Coast of South Africa, Revision 01 (April 2013).

As the Exploration and geophysical surveys in Licence Block 2C is currently not operational, and no construction activities have commenced to date (i.e. no authorised activities have commenced), all the conditions contained in the EMPr relating to commencement, construction, operation and decommissioning of the facility are not currently applicable. **As such, these conditions have been omitted from the audit checklist and are not shown or reported on in this report.** Should these activities commence in future, these conditions must be included into future audit checklists and reported on within the audit.

6.2. Conducting the Audit

As no activities have commenced to date, a desktop audit was conducted of the relevant and applicable EMPr conditions only. This included a review of all information relating to the compliance of relevant EMPr pre-construction conditions.

6.3. Post Audit

Following the audit, an Environmental Compliance Audit Report was compiled in accordance with the requirements of Appendix 7 of the EIA Regulations, 2014, as amended (GNR326). A copy of this Audit Report was submitted to the Petroleum Agency South Africa (PASA) in accordance with the requirements of Regulation 34(2)(d).

7. FINDINGS OF THE AUDIT

Compliance ratings were provided for each element of the audit checklist using the 4-point rating scale described below:

Compliance status	Rating	Description of compliance
Fully Compliant	3	Compliant with no further action required to maintain compliance
Compliant	2	Compliant apart from minor or immaterial recommendations to improve the strength internal controls to maintain compliance
Partially-Compliant	1	Major or material recommendations to improve the strength of internal controls to achieve compliance
Non-Compliant	0	Does not meet minimum requirements

Table 4 provide details of the findings of the audit.

Table 4: Audit Checklist for Compliance with the Conditions Contained in EMPr Revision 01 (April 2013)¹.

Objective	Mitigation: Action/control	Responsibility	Timeframe	Compliance Rating (0 – 3)	Audit Finding
Objective 1: Legal requirements	Prepare a register of all legislation applicable to the exploration programme/activities.	PetroSA	Pre-Construction	3	Legal requirements have been identified at a broad level section 2.1 of the EMPr
	Ensure all required permits and approvals are obtained prior to undertaking the exploration programme and adhere to all conditions attached.	PetroSA	Pre-Construction	N/A	None of the authorised activities have been initiated at the site.
	Prepare schedule of all environmental and compliance monitoring measures required during each exploration activity as well as a schedule of all reports required during and after each activity has been completed. The schedule must specify the inspection and reporting frequency and party responsible for the inspection and reporting, using Activity 7.9.2 (Refer to EMPr 2013) as minimum guideline.	PetroSA	Pre-Construction	N/A	None of the authorised activities have been initiated at the site.
	Contractors must be provided with a copy of the EMP and a written confirmation of receipt must be obtained.	PetroSA	Pre-Construction	N/A	None of the authorised activities have been initiated at the site.
	Copies of the EMP must be readily available on-board the survey vessels and support vessels at all times and the necessary equipment and personnel are available to meet U1e requirements of the EMP.	Contractors	Pre-Construction	N/A	None of the authorised activities have been initiated at the site.
	Contracts with service providers shall specifically require that the service provider complies with all relevant legislation. PetroSA reserves the right to inspect survey activities	PetroSA	Pre-Construction	N/A	Noted.

¹ It must be noted that at the wording in this table is from the project EMPr. At the time of the application, Anadarko was the operator. PetroSA has been the operator since 2021 and is the responsible party for implementation of the EMPr. As such, this audit has been completed on behalf of PetroSA.

Objective	Mitigation: Action/control	Responsibility	Timeframe	Compliance Rating (0 – 3)	Audit Finding
	at any time during the survey operation to assess compliance to the EMPr. Deviations from the EMPr without sound justification will be deemed a breach of contract.				
	Audit guidelines Audits should, through examination of records retained by the contractor verify that: <ul style="list-style-type: none"> » Legislation register was prepared prior to exploration activities » All the required permits were obtained prior to the start of exploration operations » All license conditions have been complied with throughout exploration operations » Schedule of monitoring requirements prepared for all exploration activities » Contractors were provided with copies of the EMPr and proof of receipt was obtained. » A copy of the EMPr was available on-board throughout the exploration operations. » All monitoring requirements have been undertaken in accordance with the scheduled frequency » All audit guidelines specified throughout this report have been complied with. 	PetroSA	Pre-Construction	N/A	None of the authorised activities have been initiated at the site.
Objective 2: Subsidiary plans	Ensure that the service providers (survey and support vessels etc) have the following subsidiary plans in place: <ul style="list-style-type: none"> » Oil Spill Contingency Plan » Emergency Response Plan, including MEDIVAC plan » Support Vessel and Helicopter Emergency Response Plans » Waste Management Plan » Incident Management and Reporting 	PetroSA and Contractor	Pre-Construction	N/A	None of the authorised activities have been initiated at the site.
	Compile a Communications Plan that outlines the communications procedures for all stakeholder engagement, including a Stakeholder Engagement Register, responsibilities for review of stakeholder comments, feedback to the stakeholder and close out actions and requirements.	PetroSA	Pre-Construction	N/A	None of the authorised activities have been initiated at the site.

Objective	Mitigation: Action/control	Responsibility	Timeframe	Compliance Rating (0 – 3)	Audit Finding
	Ensure that subsidiary plans are aligned with national plans and other regional, provincial, local and PetroSA plans and procedures as relevant (e.g. Integrated Waste Management Plans, Incident Management Plan, Communications Plan, etc.).	PetroSA	Pre-Construction	N/A	None of the authorised activities have been initiated at the site.
	All contingency response plans contain up to date details of: <ul style="list-style-type: none"> » Contact names and numbers for different response contingencies » Clear lines of communication for specific tasks are tabulated » Clear role and responsibilities allocated to specific staff roles with incumbents particular to the operation specified » Training and awareness needs and activities, if relevant » Formats for reporting eg filing incident reports, waste manifests etc. 	PetroSA and Contractor	Pre-Construction	N/A	None of the authorised activities have been initiated at the site.
	All plans shall be readily available and accessible on the survey and support vessels at all times.	Contractor	Pre-Construction	N/A	Noted
	PetroSA to keep copies of all subsidiary plans (listed in 7.1.2.1 in EMPr) in the Emergency Response Centre during exploration activities	PetroSA	Pre-Construction	N/A	None of the authorised activities have been initiated at the site.
	The pre-survey/sampling meeting agenda between PetroSA and Contractor must include a formal handover of subsidiary plans. All staff of the contractor and PetroSA must be familiar with the content of the plans.	PetroSA and Contractor	Pre-Construction	N/A	None of the authorised activities have been initiated at the site.
	Audit Guidelines Audits should, through examination of records retained by the facility, visual inspections and targeted interviews, verify that: <ul style="list-style-type: none"> » The required subsidiary plans are compiled prior to commencing exploration activities » The plans contain the necessary level of detail to meet the intended purposes while ensuring optimal environmental protection 	PetroSA	Pre-Construction	N/A	None of the authorised activities have been initiated at the site.

Objective	Mitigation: Action/control	Responsibility	Timeframe	Compliance Rating (0 – 3)	Audit Finding
	<ul style="list-style-type: none"> » The plans are aligned with the content of this EMP » The plans are aligned with relevant National, Provincial and Local Plans where relevant. 				
Objective 3: Survey Contractor Certification	Contractors shall be registered with the International Association for Geophysics Contractors (IAGC) and shall be able to demonstrate a track record for maintaining optimum safety and environmental protection.	PetroSA	Pre-Construction	N/A	Noted. None of the authorised activities have been initiated at the site.
	Ensure survey and support vessels is certified for seaworthiness through an appropriate internationally recognised certification programme (eg Lloyds Register, Det Norske Veritas)	PetroSA	Pre-Construction	N/A	Noted. None of the authorised activities have been initiated at the site.
	Audit Guidelines Audits should, through examination of documents retained by PetroSA verify that: <ul style="list-style-type: none"> » The contractors, where applicable, are registered with IAGC » The survey and support vessels hold a valid certificate for seaworthiness through an international certification body. 	PetroSA	Pre-Construction	N/A	N/A

8. AUDIT RESULTS AND RECOMMENDATIONS

8.1. Overview of Audit Findings

The following recommendations are made for the PetroSA Regulation 34 Audit of EMPr for Block 2C:

- » No activities have commenced thus far and therefore no activities could be audited leading to no further recommendations.

8.2. Conclusion

As activities for this project have not yet commenced, no audit findings could be provided at this point. An overall compliance percentage of the Exploration and geophysical surveys in Licence Block 2C compliance with the conditions of the EA, and EMPr Revision 01 was calculated (refer to **Table 5**). The following compliance ratings are applicable in this regard:

- » A rating of 100%: best practice / full compliance.
- » A rating of >50%: compliance is satisfactory.
- » A rating of <50%: compliance is unsatisfactory.
- » A rating of 0%: nothing in place.
- » A rating of N/A: not applicable at this time (and therefore excluded from the overall compliance rating).

Overall, the Exploration and geophysical surveys in Licence Block 2C have not yet commenced and there were only one conditions that could be audited. Legal requirements related to the activities have been identified at a broad scale.

Table 5: Overview of the compliance to EMPr conditions for the exploration and geophysical surveys in Licence Block 2C.

Compliance status	Rating	Description of compliance	EMPr	
			Results	%
Fully Compliant	3	Compliant with no further action required to maintain compliance.	1	100
Compliant	2	Compliant apart from minor or immaterial recommendations to improve the strength internal controls to maintain compliance.	N/A	N/A
Partially-Compliant	1	Major or material recommendations to improve the strength of internal controls to achieve compliance.	N/A	N/A
Non-Compliant	0	Does not meet minimum requirements.	N/A	N/A
TOTAL:			1	100

9. EVALUATION OF THE EMPr

As per Appendix 7 of the EIA Regulations, 2014 as amended (GNR 326)., an external audit report must include “an indication of the ability of the EMPr to:

- (i) sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the undertaking of the activity on an on going basis;

- (ii) Sufficiently provide for the avoidance, management and mitigation of environmental impacts associated with the closure of the facility; and
- (iii) Ensure compliance with the provisions of the EMPr;"

9.1. Ongoing impact avoidance, management and mitigation

Based on the audit outcomes and results reported above, the auditor is satisfied that the EMPr is sufficient, and able to provide for the avoidance, management and mitigation of the environmental impacts associated with the undertaking of the activity on an ongoing basis once the activities commence, and that no further amendment or alteration to the EMPr is required in order to maintain this reliability of the EMPr provided that there are no changes or additional activities in the renewal work programme. Although the EMPr reflects "Anadarko" as the responsible entity to carry out the activities and ensuring compliance with the EMPr, it has been indicated by PetroSA that Anadarko exited the Block and PetroSA has been in sole operatorship since February 2021.

9.2. Closure impact avoidance, management and mitigation

The facility is not currently operational, and therefore no decommissioning activities are applicable to this audit. No further amendment or alteration to the EMPr is required currently.

9.3. Ensuring compliance with provisions of the EMP

Based on the audit outcomes and results reported above, the auditor is satisfied that the EMPr is sufficient and able to ensure compliance with the provisions of the environmental authorisation and EMPr, and that no further amendment or alteration to the EMP is required in order to maintain this reliability of the EMPr.

10. CONCLUSIONS AND RECOMMENDATIONS

This Chapter provides an overview of the results and recommendations of the environmental audit of the Exploration and geophysical surveys in Licence Block 2C with the specifications of the project EMPr.

It should be noted that no significant non-compliances were recorded as part of the independent external environmental compliance audit. None of the listed activities has commenced and most of the planning phase requirements are therefore not yet applicable.

Recommendation: All the planning phase requirements should be complied with before any survey activities are initiated.

It is the opinion of the independent auditor that EMPr Revision 01 (April 2013), and its supporting documentation sufficiently provides for the avoidance, management and mitigation of environmental impacts associated with the project and ensures compliance with the provisions of EMPr Revision 01.

11. STAKEHOLDER CONSULTATION

11.1. Notification of all potential and registered interested and affected parties

In accordance with the requirements of Section 34(6) of the EIA Regulations, 2014 as amended (GNR 326), the following consultation must form part of the audit report submission:

- » 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.

In order to remain compliant with these requirements, all potential and registered interested and affected parties have been notified of the submission of the external compliance audit report by: Nicolene Venter

- » The placement of an advertisement with a local newspaper: Die Burger on 07 August 2023.
- » Uploading the audit report onto the Savannah Environmental website for download upon request: <http://www.savannahsa.com/public-documents/energy-generation/>.

APPENDIX A:
CVS OF INDEPENDENT AUDITORS AND REPORT REVIEWER

**APPENDIX B:
ADVERT OF REPORT AS PUBLISHED**