



Environmental and Social Impact Assessment – Non-Technical Summary

Sustainable Aviation Fuel

Green Sky Capital

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Acronyms and Abbreviations

Acronym	Definition
Aol	Area of Influence
BAT	Best Available Techniques
BILZ	Bétoya Industrial and Logistic Zone
BOD	Biochemical Oxygen Demand
BTEX	Benzene, Toluene, Ethylbenzene and Xylenes
CESMP	Construction Environmental and Social Management Plan
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
COD	Chemical Oxygen Demand
CRVA	Climate Risk and Vulnerability Assessment
dB(A)	A-weighted Decibel
EBRD	European Bank for Reconstruction and Development
EC	European Community (as in Regulation (EC))
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EP	Equator Principles
EPC	Engineering, Procurement and Construction
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESR	Environmental and Social Requirement
EU	European Union
FGD	Focus Group Discussion
GBVH	Gender-Based Violence and Harassment
GHG	Greenhouse Gas
GIIP	Good International Industry Practice
GRM	Grievance Redress Mechanism
HAZID	Hazard Identification
HEFA	Hydroprocessed Esters and Fatty Acids



Acronym	Definition
HR	Human Resources
HSE	Health, Safety and Environment
IBA	Important Bird and Biodiversity Area
IFC	International Finance Corporation
IUCN	International Union for Conservation of Nature
KBA	Key Biodiversity Area
NO	Nitrogen Monoxide (Nitric Oxide)
NO ₂	Nitrogen Dioxide
NO _x	Nitrogen Oxides
NTS	Non-Technical Summary
NWM	Nador West Med
PM ₁₀	Particulate Matter with an aerodynamic diameter of 10 µm or less
PM _{2.5}	Particulate Matter with an aerodynamic diameter of 2.5 µm or less
QRA	Quantitative Risk Assessment
SAF	Sustainable Aviation Fuel
UCO	Used Cooking Oil
WBG	World Bank Group
WHO	World Health Organization
WWTP	Wastewater Treatment Plant



1.0 Introduction

This is an interim, work-in-progress version of the Non-Technical Summary (NTS) prepared based on the Client's request for an initial review and does not represent the final NTS. Several surveys and technical assessments remain ongoing or pending and will be incorporated in the final iteration of the Environmental and Social Impact Assessment (ESIA) and NTS. These include the air quality and noise modelling and associated impact assessments and social baseline surveys and stakeholder engagement activities. The relevant baseline conditions, impact assessments, mitigation measures and conclusions will be reviewed and updated accordingly following completion of these activities and receipt and evaluation of the outstanding study results.

1.1 Project Background

Green Sky Capital (GSC) is proposing to develop a Sustainable Aviation Fuel (SAF) production facility within the Bétoya Industrial and Logistic Zone (BILZ) of the Nador West Med (NWM) Complex, in Nador Province, Oriental Region, north-eastern Morocco (hereafter referred to as the Project).

The Project will occupy approximately 8.8 hectares (88,000 m²) of land designated for industrial and energy-related activities within the NWM Complex, approximately 30 km west of the city of Nador.

The facility is designed to produce approximately 176,000 tonnes of SAF annually, alongside other renewable fuel products, including renewable diesel, renewable naphtha and small quantities of bio-propane.

SAF is an alternative to conventional aviation fuel that can help reduce greenhouse gas emissions associated with air travel. The Project will use waste-derived and residual oils and fats, such as used cooking oil and animal fats, as raw materials to produce renewable fuels.

The Project is intended to contribute to Morocco's development of lower-carbon industries, support the productive reuse of waste materials and supply renewable aviation fuels to national and international markets.

The facility will be developed within the existing NWM industrial and logistics development area, which provides access to planned industrial infrastructure and the NWM Port. The finished products are intended to be exported through the port.

Green Sky Capital appointed SLR Consulting (SLR), working in collaboration with CLEAN TECH, a local environmental consultant in Morocco, to undertake the ESIA for the Project.

The assessment has been prepared with consideration of applicable Moroccan environmental legislation and relevant international environmental and social standards, including those of the European Bank for Reconstruction and Development (EBRD), the International Finance Corporation (IFC) and the World Bank Group.

The ESIA considers the Project's potential effects on air quality, noise, soil and water resources, biodiversity, landscape, cultural heritage, traffic, community health and safety, employment and local livelihoods.

The assessment draws upon existing environmental and social studies undertaken for the wider NWM Complex, supplemented by Project-specific validation surveys and specialist assessments.

The findings of the ESIA will inform the Project's environmental and social management measures, monitoring arrangements and ongoing engagement with affected communities and other stakeholders.



2.0 Project Description

2.1 Site Location

The Project will be developed within the BILZ of the NWM Complex, in the rural commune of Iaazzanene, Nador Province, Oriental Region, north-eastern Morocco. The site is located approximately 30 km west of the city of Nador, near the Mediterranean coastline.

The Project will occupy Plots 14 and 17 of Block H-F, within Phase 1.1 of the Energy Zone (Figure 2-1) covering approximately 8.8 hectares shown on Figure 2-2. The site has already been cleared and levelled as part of the wider NWM development and currently consists mainly of bare, compacted ground with little or no vegetation. No residential buildings, agricultural activities or other active land uses were identified within the Project boundary during the site visit.

The surrounding area includes planned industrial and logistics developments, agricultural land and rural settlements, including Imhiaten and Sammara. The nearest identified residential dwellings are approximately 230 m from the Project boundary. Access will be provided through the existing and planned road network serving BILZ and the wider NWM Complex.

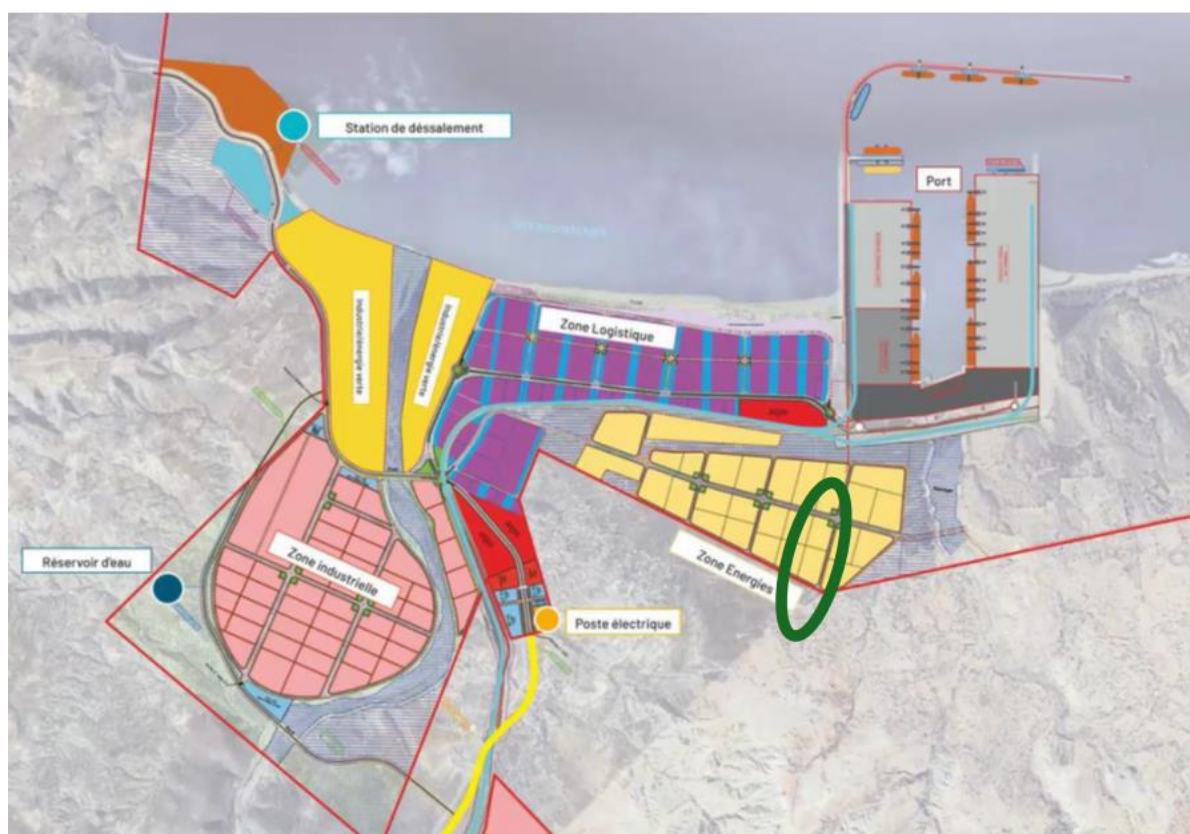


Figure 2-1: Project Location within the Wider NWM Complex





Figure 2-2: Project Locality and Boundaries



2.2 Land Ownership

The Project land is owned and administered by Nador West Med (NWM), which manages the Bétoya Industrial and Logistic Zone (BILZ) under Decree No. 2-16-518 of 6 October 2016. The land will be made available to the Moroccan Project company through a long-term land-use agreement, currently being finalised, for an initial period of 20 years, renewable for subsequent 20-year periods.

Development of the wider NWM Complex historically involved land acquisition, compensation and resettlement of affected landowners and land users. These processes were guided by the Land Acquisition and Livelihood Restoration Framework (LRF) disclosed by EBRD in 2015, alongside the Environmental and Social Action Plan (ESAP) and Stakeholder Engagement Plan (SEP). The 2023 NWM Activity Zone ESIA documents the progress of these processes, including the expropriation and transfer of land to NWM and associated resettlement activities.

Based on currently available information, no additional physical displacement or loss of existing agricultural activities is anticipated within the Project boundary. This will be verified through Project-specific social baseline surveys and stakeholder engagement.

2.3 Land Use

The Project site currently comprises cleared and levelled land, characterised by a generally flat, compact sandy surface with little to no vegetation or ongoing activities.

A comparison of satellite imagery from January 2023 and January 2026, shown in Figure 2-3, indicates significant changes in land use associated with the development of the wider NWM Complex. In 2023, the Project site and surrounding areas were largely covered by trees, with agricultural land to the south and west and limited port infrastructure along the coastline. By 2026, most of the tree cover within the development area had been removed, the land had been cleared, and port and access infrastructure had expanded. Agricultural activities remain present in the surrounding areas.

As the wider NWM development has already been subject to environmental and social assessments, the Project-specific assessment considers the site's current cleared and levelled condition as the baseline for the proposed development.

The time-series comparison demonstrates substantial land-use and land-cover change within the Project site and its immediate surroundings between January 2023 and January 2026, associated with the wider development and preparation of BILZ. The Project-specific assessment therefore considers the current, already cleared and levelled condition of the site as the baseline for the proposed SAF development.



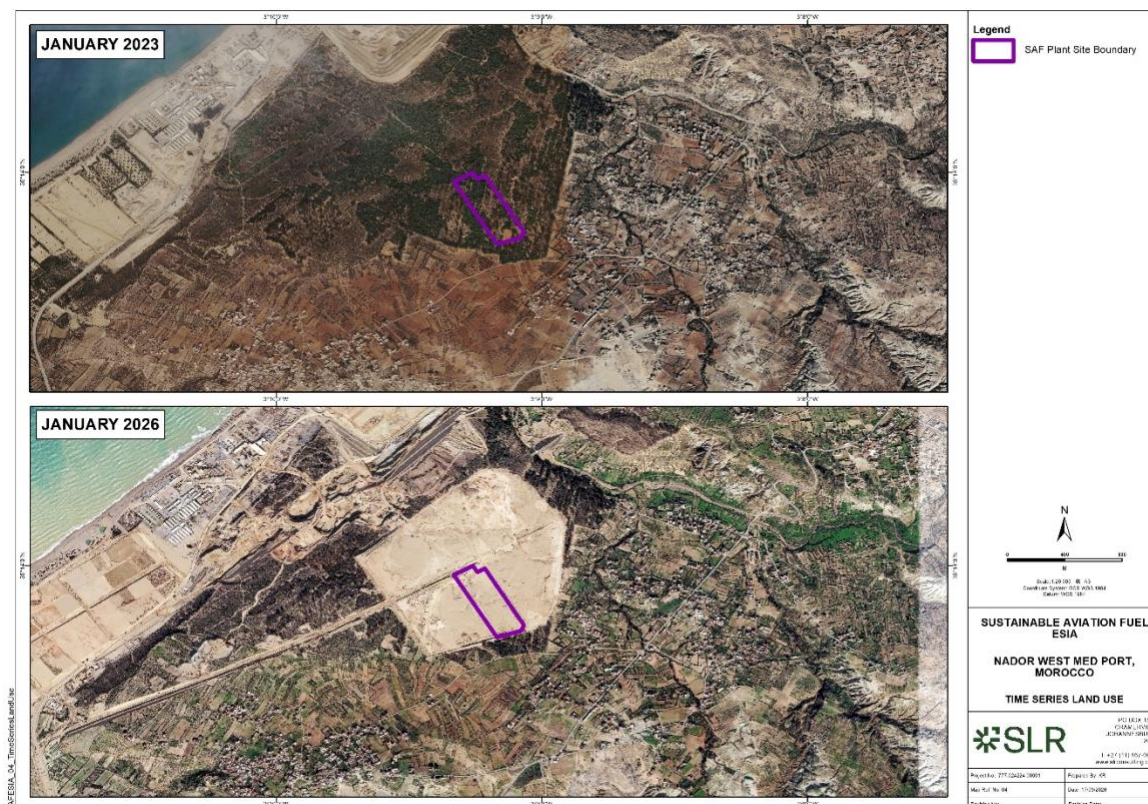


Figure 2-3: Satellite Imagery of the Project Area from 2023 and 2026

2.4 Project Components and Production Process

2.4.1 Project Components

The proposed facility will have an annual production capacity of approximately 176,000 tonnes of sustainable aviation fuel (SAF), alongside renewable diesel, renewable naphtha and small quantities of bio-propane. The facility will comprise feedstock receiving, pretreatment and storage areas; renewable fuel production units; an on-site hydrogen production unit; and dedicated storage tanks for finished products. Supporting infrastructure will include water supply, cooling, steam generation, electricity distribution, wastewater treatment and reuse, air emissions management, flaring and fire-protection systems, as well as internal roads, tanker loading and unloading areas, control rooms, laboratories, workshops and offices. Feedstock and product storage facilities will incorporate containment and monitoring systems to prevent and manage accidental releases.

The proposed facility will have an annual production capacity of approximately 176,000 tonnes of SAF. It will also produce other renewable fuel products, including renewable diesel, renewable naphtha and small quantities of bio-propane.

The proposed arrangement of these facilities is shown in the Project layout plan shown in Figure 2-4.



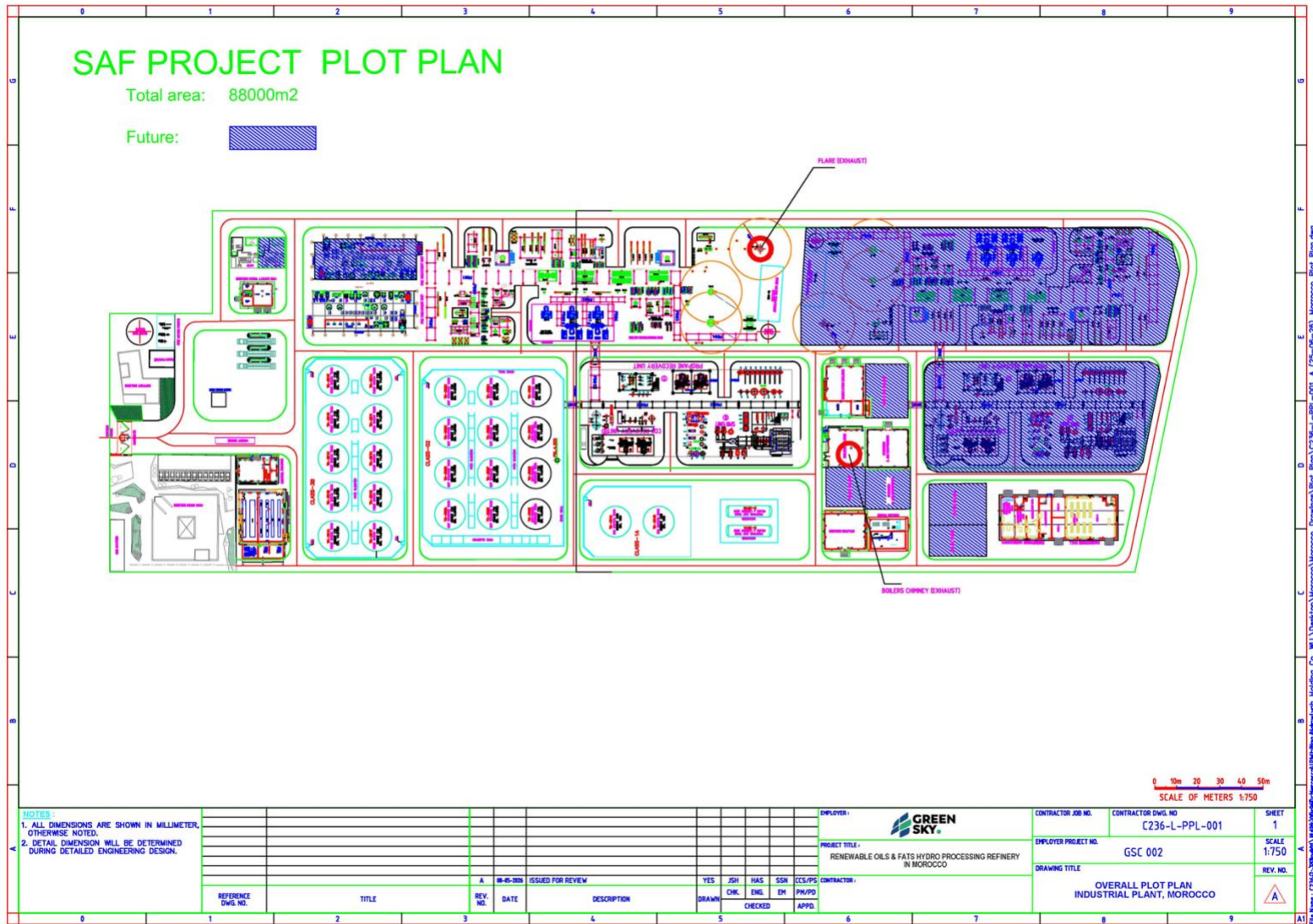


Figure 2-4: Project Layout Plan



2.4.2 Project Technology

Best Available Techniques (BAT), established under the EU Industrial Emissions Directive (2010/75/EU), provide benchmarks for environmental protection, including emission limits, monitoring and pollution-control measures. The EU BAT Conclusions for the Refining of Mineral Oil and Gas (2014/738/EU) are particularly relevant to the Project's processing, storage, wastewater treatment and emissions management activities.

The Project will use Axens' Vegan® technology based on the established HEFA process and incorporates several measures consistent with BAT principles. These include wastewater segregation and treatment, recovery and reuse of treated water, spill and leak prevention, waste segregation and recovery, and minimisation of routine flaring. The proposed wastewater treatment system is particularly aligned with BAT 11–13, which address water consumption, wastewater generation and pollutant removal.

2.4.3 SAF Production Process

The SAF production process will comprise five main stages, from feedstock sourcing and transportation to fuel production, storage and dispatch.

Feedstock sourcing and transportation: The Project will use waste-derived oils and fats, primarily used cooking oil, animal fats and residues from food processing and edible-oil refining, sourced from domestic and international suppliers. Domestic feedstocks will be transported by road tanker, while imported materials will arrive through NWM Port. All feedstocks will undergo quality checks, with sustainability and traceability controls implemented to verify their origin and suitability.

Feedstock storage: Feedstocks will be stored in 12 above-ground tanks with a combined capacity of approximately 36,000 m³. Storage facilities will incorporate spill containment, drainage controls, monitoring and fire protection systems.

SAF production: Feedstocks will undergo pretreatment before being processed with hydrogen to produce SAF, renewable diesel, renewable naphtha and bio-propane. Hydrogen will be generated on site using natural gas and steam. Supporting systems will manage wastewater and process gases, with flaring used during start-up, shutdown and abnormal operating conditions.

Product storage and dispatch: Finished products will be stored in 16 dedicated tanks with a combined capacity of approximately 41,732 m³, equipped with spill containment, leak detection and fire protection systems. Products intended for export will be transported by road tanker to NWM Port, while products for domestic markets may be transported directly by road.

The production process will comprise five main stages, from feedstock collection and transportation to the storage and dispatch of finished products.

2.5 Main Project Activities

Construction and Commissioning: Construction will involve site preparation, excavation and foundation works, installation of processing equipment, storage tanks, utilities, buildings, internal roads and drainage infrastructure. Temporary facilities will include site offices, equipment storage, laydown areas and worker welfare facilities. Construction machinery and equipment will be transported to the site by road and/or through NWM Port.

Following construction, commissioning will involve equipment testing, cleaning, inspections and gradual plant start-up. Hydrotest water will be reused where practicable, temporarily stored and treated as required, with treated surplus water transported to an approved facility for final treatment or disposal. Initial operations will commence at approximately 60%



capacity, with start-up flaring managed through the smokeless flare and off-specification products retained for reprocessing.

Operation: The facility will operate continuously, approximately 8,000 hours annually (333 days), involving feedstock receipt and storage, renewable fuel production, hydrogen generation, wastewater treatment, product storage and dispatch, and routine maintenance. Environmental monitoring, waste management, security and emergency preparedness measures will also be implemented.

Decommissioning: The Project has an anticipated operational life of approximately 30 years, after which it may be decommissioned, refurbished or repurposed. If decommissioned, activities will include safe shutdown, removal of materials and chemicals, dismantling of facilities and appropriate waste management, guided by a detailed decommissioning and site restoration plan.

2.6 Materials and Resources Needs

Feedstock: The Project will require approximately 200,000 tonnes of waste-derived oils and fats annually, comprising around 40% domestically sourced used cooking oil (UCO), 30% imported UCO and 30% imported soap-stock acid oil (SSAO).

Fuel, Gas and Power Supply: During construction, electricity will be supplied by temporary diesel generators, with diesel also used for construction machinery and vehicles. During operation, electricity will be supplied from the national grid, with an average demand of approximately 5 MW. Natural gas consumption is estimated at 2,000–2,500 Nm³/hour for hydrogen generation, steam production and process heating. Emergency diesel generators will provide backup power for essential systems.

Water Supply: Construction water demand is estimated at 20–40 m³/day, supplied by tanker from approved sources. During operation, total water demand is estimated at 1,193 m³/day, of which approximately 304 m³/day will be recovered and reused, reducing freshwater demand to approximately 889 m³/day. Water will be supplied through the external network serving the development.

Waste Management: Construction and operation will generate hazardous and non-hazardous waste, including construction debris, packaging, used oils, spent catalysts and wastewater treatment residues. Approximately 1.3 tonnes/day of dewatered sludge is expected during operation. Waste will be segregated, with reuse and recycling prioritised where practicable, and transferred to authorised contractors for appropriate treatment or disposal.

Wastewater Management: Construction wastewater will be collected for appropriate treatment and disposal. During operation, approximately 612 m³/day of wastewater will be generated and treated according to its characteristics. Around 304 m³/day will be recovered for reuse, while approximately 306 m³/day of treated effluent will be discharged to the wider development's wastewater collection network, subject to applicable requirements. Measures will be implemented to prevent untreated wastewater or contaminated runoff from entering the surrounding environment.

2.7 Personnel and Accommodation

The Project is expected to employ approximately 400 workers during peak construction, including skilled and unskilled personnel. During operation, an indicative workforce of 162 personnel is anticipated, comprising 57 day staff and 105 shift workers across five crews, covering operational, technical, maintenance, HSE, security and administrative functions.

No worker accommodation camps will be established within the Project site or NWM zone. Non-local workers will be accommodated in existing rented accommodation in nearby towns,



such as Nador, Selouane and Beni Ensar, with daily transport to the site arranged by the EPC contractor and subcontractors. Local workers are expected to reside in their existing homes.

2.8 Associated Facilities

No associated facilities have been identified for the Project. The Project will utilise existing or planned shared infrastructure within the wider NWM Complex, including roads, utilities, port and logistics facilities, which are not being developed specifically for the Project. No dedicated off-site infrastructure, such as a port terminal, storage facility or product pipeline, is currently proposed.

2.9 Project Timeline

The overall Project programme is approximately 22 months, from contract award in October 2026 to start-up in August 2028. Construction/installation is expected to extend over 19 months, scheduled from November 2026 to May 2028, followed by commissioning from May to August 2028.

2.10 Project Area of Influence

The Project Area of Influence (AoI) includes the 8.8-hectare Project site and surrounding areas potentially affected by construction, operation and decommissioning. The extent varies by impact type and may include air quality, noise, traffic, nearby communities, water resources and biodiversity. The ESIA also considers cumulative impacts from other developments within the wider NWM Complex. Assessment boundaries will be refined, where necessary, following completion of the outstanding technical studies and stakeholder engagement activities.



3.0 Project Alternatives

The ESIA considered the no-project option, alternative locations, site layouts, and production and environmental control technologies to minimise environmental and social impacts.

3.1 No-Project Alternative

The No-Project Alternative would avoid the environmental and social impacts associated with construction and operation of the facility, including emissions, wastewater generation, resource consumption and traffic. However, as the site is already cleared and designated for industrial development, it could be allocated to another industrial activity with similar potential impacts. This alternative would also mean foregoing the anticipated benefits of renewable fuel production, potential greenhouse gas emission reductions, employment and investment. The No-Project Alternative was therefore not selected.

3.2 Location Alternatives

Six potential locations were assessed: BILZ at NWM, Tanger Med, Jorf Lasfar, Mohammedia, Kenitra Atlantic Free Zone and Berrechid. The assessment considered land availability and use, environmental sensitivities, proximity to communities, water resources, transport requirements and access to infrastructure.

BILZ at NWM was selected as the preferred location due to its designation for industrial development, availability of suitable land, access to the deep-water port and supporting infrastructure. The alternative locations presented constraints relating to land availability, existing industrial activities, environmental sensitivities, proximity to urban areas or transport and water requirements.

3.3 Layout Alternatives

Two site layouts, Options A and B, were assessed, considering the arrangement of processing units, storage facilities, access roads and supporting infrastructure, particularly in relation to safety and proximity to occupied buildings and residential areas.

Option B was selected as the preferred layout as it provides improved separation between potentially hazardous activities and occupied areas, separates tanker unloading from the main processing facilities and facilitates emergency access.

3.4 Technology Alternatives

Production Technology: Alternative aviation decarbonisation technologies and SAF production processes were considered. SAF was identified as the preferred near- to medium-term option due to its compatibility with existing aircraft and airport infrastructure. The Hydroprocessed Esters and Fatty Acids (HEFA) process was selected because it is commercially established and suitable for converting the proposed waste oils and fats into renewable fuels.

Wastewater Treatment: Alternative treatment technologies were assessed based on treatment efficiency, operational requirements, costs and water-reuse potential. The selected system combines physical, biological, filtration and membrane treatment processes to remove contaminants and maximise water recovery and reuse.

Air Pollution Control: Wet and dry scrubber technologies were compared based on pollutant removal efficiency, operational requirements and environmental considerations. Wet scrubbers were selected due to their versatility and ability to remove gaseous and particulate pollutants.



4.0 Regulatory and Institutional Framework

The Project will be developed in accordance with applicable Moroccan environmental and social legislation and relevant international lender requirements.

4.1 National Regulatory Requirements

Environmental assessment in Morocco is governed principally by Law No. 49-17 on Environmental Assessment, which updates the framework established under Law No. 12-03 on Environmental Impact Studies. The Project is subject to a detailed Environmental Impact Assessment (EIA), including a mandatory public inquiry and review by the competent environmental authorities. Following a favourable review, an Environmental Acceptability Decision and Certificate must be obtained before the relevant development authorisations can be issued.

The Project must also comply with applicable national requirements relating to air emissions, water use and wastewater discharge, waste and hazardous materials management, occupational health and safety, labour conditions, biodiversity and cultural heritage. Relevant permits and approvals must be obtained before construction, commissioning or operation, as applicable.

4.2 International Lender Requirements

The Project is being developed with a view to financing by the European Bank for Reconstruction and Development (EBRD) and will therefore be assessed against the EBRD Environmental and Social Policy (2024) and its Environmental and Social Requirements (ESRs). The principal applicable requirements cover environmental and social risk management (ESR 1), labour and working conditions (ESR 2), resource efficiency and pollution prevention (ESR 3), community health, safety and security (ESR 4), land acquisition and displacement (ESR 5), biodiversity (ESR 6), cultural heritage (ESR 8), and stakeholder engagement and information disclosure (ESR 10). ESR 7 and ESR 9 are not applicable to the Project.

The Project will also consider the IFC Performance Standards and applicable World Bank Group Environmental, Health and Safety (EHS) Guidelines as relevant international benchmarks. Where Moroccan requirements and applicable lender standards differ, the more stringent requirement will be adopted. Compliance will be managed through the Project's Environmental and Social Management System (ESMS), including the identification and monitoring of applicable legal obligations, permits and environmental and social commitments.

5.0 ESIA Approach

The assessment draws on available baseline information, site investigations, specialist studies and stakeholder engagement. Potential impacts are evaluated based on their intensity, geographical extent, duration and likelihood of occurrence. The assessment also considers cumulative impacts arising from the Project alongside other developments.

Mitigation measures are identified for potentially significant impacts, and the remaining impacts are assessed to determine their significance after mitigation.

In accordance with the Moroccan environmental approval process, the ESIA will be submitted to the relevant authorities and made available for public consultation. Feedback received through the consultation and review process will be considered before the assessment is finalised and an environmental acceptability decision is issued.



6.0 Description of the Receiving Environment

6.1 Physical Environment

6.1.1 Climate

The Project is located in the Oriental Region of north-eastern Morocco, which experiences a hot, semi-arid Mediterranean climate, characterised by hot, dry summers and relatively mild, wetter winters.

Based on climate records for 1991–2020, average annual rainfall is approximately 315 mm, with most rainfall occurring between October and April. July and August are generally the hottest months, with average daily maximum temperatures reaching approximately 35°C, while winter temperatures are considerably lower. The region experiences approximately 35 days per year when maximum temperatures exceed 35°C.

Although rainfall is relatively low, occasional intense rainfall events can generate rapid surface runoff and localised flooding. The main climate-related hazards relevant to the Project include extreme heat, drought and water scarcity, intense rainfall and flooding, and wildfire risks in vegetated areas.

Climate projections indicate that temperatures and the frequency of extreme heat events are likely to increase, while reduced rainfall and higher evaporation may contribute to greater water stress.

6.1.2 Ambient Air Quality

The Project is located within the developing NWM industrial-port complex, where the immediate surroundings were predominantly undeveloped at the time of the baseline surveys. Existing sources of air pollution include wind-blown dust, marine aerosols, vehicle exhaust emissions, truck movements on unpaved roads and dust generated by earthworks and construction activities. No established industrial operations were identified in the immediate vicinity of the Project site during the September 2026 surveys.

To establish existing air quality conditions, CLEAN TECH conducted ambient air quality monitoring at two locations between 2 and 9 September 2026. The monitoring stations were positioned near residential communities that could potentially be affected by future Project emissions.

Ambient air quality monitoring assessed nitrogen oxides (NO, NO₂ and NO_x), sulphur dioxide (SO₂), carbon monoxide (CO) and particulate matter (PM₁₀ and PM_{2.5}). All monitored parameters complied with applicable Moroccan ambient air quality standards. However, NO₂, PM₁₀ and PM_{2.5} exceeded the WHO (2021) 24-hour guideline values at both monitoring locations (AQ1 and AQ2). Against the EU 2030 air quality limits, NO₂ and PM₁₀ exceeded the 24-hour limits at both locations, while PM_{2.5} was equal to the limit at AQ1 and below it at AQ2. SO₂ remained below both WHO and EU guideline values.

6.1.3 Ambient Noise

The existing noise environment is relatively quiet, influenced mainly by local traffic, occasional truck movements, NWM construction activities and wind. Noise monitoring was undertaken by CLEAN TECH between 6 and 8 September 2026 at five locations, including a residential receptor in Douar Imhiatine (NM1) and four locations along the Project boundary (NM2–NM5). All measured average noise levels were below the applicable IFC/World Bank Group daytime and nighttime guidelines for residential and industrial areas.



6.1.4 Geomorphology, Geology and Soil

The wider NWM area is characterised by coastal plains, sandy and dune formations, hills and valleys associated with seasonal watercourses. The underlying geology includes Quaternary sands and Miocene marls, while soils in the wider landscape comprise sandy, sandy-loam, stony and alluvial soils.

The Project site occupies approximately 88,000 m² of land that has already been cleared, graded and prepared for industrial development. Consequently, the original surface soils have been disturbed by previous earthworks.

To establish baseline soil quality, CLEAN TECH collected five soil samples (S1–S5) on 5 September 2026 from locations distributed across the Project site. The samples were analysed for soil characteristics, including pH, electrical conductivity and organic matter, together with potential contaminants such as heavy metals, total petroleum hydrocarbons (TPH) and volatile organic compounds, including benzene, toluene, ethylbenzene and xylenes (BTEX). In the absence of Moroccan soil quality standards covering all the parameters analysed, the results were compared against Dutch soil quality screening values.

The results indicate that concentrations of the contaminants assessed were below the applicable Dutch comparative screening values at all five sampling locations. TPH (C10–C40) and BTEX compounds were below the analytical limits of quantification at all locations.

6.1.5 Topography

The wider NWM area comprises coastal lowlands, gently sloping terrain, hills and more elevated inland areas. Elevations within the wider industrial-port complex range from sea level to approximately 100 m, while higher terrain occurs farther inland.

The Project site is located at an approximate elevation of 50–80 m above sea level and has been substantially levelled as part of the wider NWM development. No pronounced slopes or major topographical features were identified within the Project boundary.

These conditions are relevant to the design of site drainage, stormwater management and earthworks.

6.1.6 Surface Water and Hydrology

The surface water baseline was established through a review of the 2023 NWM Phase I ESIA and a Project-specific Hydrology Report provided in September 2026. The hydrological assessment was desktop-based, using existing regional and NWM-specific information; no primary hydrological field measurements were undertaken.

The wider area is characterised by seasonal watercourses, known as oueds, which generally remain dry or carry limited flows for much of the year but can experience significant runoff during heavy rainfall. The main watercourses in the surrounding area include Oued Kert and Oued N'Tiya. Oued Kert is located approximately 2.7 km southwest of the Project site.

The Project site has been cleared and levelled for industrial development and does not contain a permanent natural watercourse. However, intense rainfall events may result in surface runoff, particularly across compacted or impermeable surfaces. These conditions have been considered in the Project-specific hydrological assessment and will inform the design of stormwater drainage and flood protection measures.

6.1.7 Groundwater Quality

The groundwater baseline was established through a review of existing hydrogeological information and sampling undertaken by CLEAN TECH on 9 September 2026 at the Villa Yasmine 9999 Well in the wider Project area. The sample was analysed for physicochemical



and microbiological parameters and compared against Moroccan drinking water standard NM 03.7.001 (2006), given the use of groundwater by some nearby residents for domestic and agricultural purposes. The Project itself will not rely on groundwater for potable water supply.

The groundwater sample had a pH of 6.8 and dissolved oxygen concentration of 5.32 mg/L, both within the applicable reference ranges. Nitrate, nitrite, ammonium and organic matter concentrations were also below the respective NM 03.7.001 reference values, while no total coliforms, faecal coliforms, *Escherichia coli* or intestinal enterococci were detected. Electrical conductivity was recorded at 14,000 $\mu\text{S}/\text{cm}$, exceeding the reference value of 2,700 $\mu\text{S}/\text{cm}$ and indicating highly mineralised groundwater. BOD₅, COD and TSS were also analysed; however, no corresponding reference values are specified in NM 03.7.001 for these parameters.

6.1.8 Archaeology and Cultural Heritage

The September 2026 archaeological walkover included a visual inspection of the Project site, exposed ground surfaces, earthworks material and visible soil profiles. The survey sought evidence of historical occupation, including structural remains, pottery, ceramics, stone tools and other archaeological materials.

No visible archaeological remains or cultural heritage features were identified within the Project boundary during the walkover. The possibility of previously unidentified buried archaeological remains cannot be entirely excluded. A Chance Find Procedure will be implemented during construction to ensure that any unexpected archaeological discoveries are appropriately protected and managed.

6.1.9 Landscape and Visual Amenities

The NWM Complex is characterised by gently sloping terrain towards the Mediterranean coast, with elevations ranging from 0 to 300 m. The wider landscape comprises sandy beaches, rocky headlands, forested hills, agricultural land and watercourses, including Oued Kert and Oued N'Tiya. The principal landscape features include the Oued Kert estuary, coastal beaches and coves, and inland forested and agricultural areas with dispersed rural settlements.

6.1.10 Traffic And Transportation

The NWM development is connected to the regional road network through National Road RN16, which forms part of Morocco's Mediterranean coastal route, and Provincial Road RP6202, which provides additional connectivity towards Nador and surrounding settlements.

The principal access route to the Project extends approximately 2.5 km southwest to a roundabout on RN16, north of Sammar. This route passes mainly through industrial and agricultural land and avoids passing directly through Sammar.

A separate route connects the Project area to NWM Port, providing an approximately 4 km connection through the wider industrial-port development. This route offers the potential to transport materials and products between the facility and port while limiting the use of public roads through nearby settlements.

Existing traffic in the area comprises passenger vehicles, local commercial traffic and heavy goods vehicles, including those associated with ongoing NWM development. Additional transport infrastructure is also planned or under development, including improvements to RN16, a motorway connection towards Guercif and a rail connection towards Selouane.



6.2 Biological Environment

The biodiversity baseline was established through a review of the 2023 NWM Phase I ESIA, published records and a site visit in September 2026.

Proximity to Legally Protected and Internationally Recognised Areas: Several biodiversity-sensitive areas occur in the wider region, including the Alborán Sea Important Marine Mammal Area (approximately 2 km offshore), Jbel Gourougou (11–13 km), Trois Fourches Key Biodiversity Area (18 km) and Sebkha Bou Areg Ramsar site (20 km). No terrestrial protected areas or Key Biodiversity Areas overlap the Project site or occur within approximately 10 km. As the Project involves no marine works, no direct disturbance of protected areas or marine habitats is anticipated.

Flora: The Project site has been cleared of natural vegetation, although plantations, agricultural land and Mediterranean shrubs occur in the surrounding landscape. No internationally threatened plant species were identified in the 2023 NWM ESIA, and no direct loss of natural vegetation is anticipated within the Project footprint. No direct loss of natural vegetation within the Project footprint is therefore anticipated.



Figure 6-1: Photos from the Site

Mammals: The wider NWM landscape supports a relatively small assemblage of common and adaptable terrestrial mammals associated with Mediterranean scrub, artificial plantations, open ground and agricultural habitats. The 2023 NWM ESIA reported five species from the wider landscape including North African Hedgehog (*Atelerix algirus*), White-toothed Shrew (*Crocidura russula*), Cape Hare (*Lepus capensis*), European Rabbit (*Oryctolagus cuniculus*), and Wild Boar (*Sus scrofa*). European Rabbit is listed as Endangered (EN) in IUCN Red List. All other species are IUCN Least Concern (LC).

These records relate to the surrounding habitats and do not confirm the presence of these species within the Project site. Given the absence of vegetation and suitable shelter, the Project plot is expected to provide very limited feeding, breeding or shelter opportunities for mammals. Surrounding plantations, agricultural land and seasonal watercourses provide more suitable habitat.

Avifauna: The 2023 NWM ESIA identified 27 bird species, while a review of eBird records identified a further 20 species from the wider coastal region, giving a combined list of 47 species. These include gulls, terns, shorebirds, seabirds and terrestrial species. Several species recorded in the wider region are of international conservation concern, including European turtle dove, Audouin's gull, black-legged kittiwake, Yelkouan shearwater and curlew sandpiper, which are identified as Vulnerable in the ESIA. These records represent the wider coastal landscape and should not be interpreted as confirmed observations within the Project footprint.



The Project site itself contains no woodland, scrub, wetlands or other habitat features likely to support significant nesting, roosting or feeding activity. Its importance for birds is therefore considered limited compared with the surrounding natural and semi-natural habitats.

Herpetofauna: The biodiversity review identified four reptile species in the wider landscape: Mediterranean pond turtle, Morocco lizard-fingered gecko, Greek tortoise and common chameleon. The Mediterranean Pond turtle was previously recorded in the wider NWM area, while records of the gecko and Greek tortoise were identified through iNaturalist. A common chameleon carcass was observed outside the Project boundary during the 2026 site visit. The Greek tortoise is identified as Vulnerable (VU) in the NWM ESIA, 2023.

The Project site contains no watercourses, wetlands or significant vegetation and is therefore considered to provide limited suitable habitat for these species.

Ecosystem Services: The Project site comprises previously modified industrial land with very limited ecosystem services. No agricultural, grazing, natural resource collection or cultural services have been identified within the site. The surrounding landscape provides a wider range of services, including agriculture, habitat provision and water regulation. As all Project activities will remain within the designated industrial plot, no direct loss of ecosystem services in surrounding areas is anticipated.

Natural, Modified and Critical Habitat: The Project site comprises highly modified habitat with no natural vegetation. The surrounding landscape includes agricultural land, plantations, scrub, watercourses, coastal and marine habitats. Based on the desktop review and September 2026 site visit, there is no indication that the Project site qualifies as Critical Habitat. No protected areas, Key Biodiversity Areas (KBAs) or Important Bird and Biodiversity Areas (IBAs) overlap the site or occur in its immediate vicinity, and no Critically Endangered or Endangered species have been identified within the Project footprint.

6.3 Socio-economic Environment

The Project is located within Iaazzanene Commune, Nador Province, in a predominantly rural area undergoing significant change associated with the development of the NWM industrial-port complex.

According to the 2024 census, Nador Province had approximately 565,987 residents living in 146,090 households. Iaazzanene Commune had approximately 12,706 residents in 2,925 households, representing an increase in population of approximately 14% compared with 2014.

The surrounding settlements comprise rural villages, known as douars, and dispersed residential properties. Nearby communities include Sammar, Imhiaten and Bouyafar. The nearest identified dispersed residential receptors are located less than 230 m from the Project boundary. No residential properties or settlements are located within the Project site itself.

Historically, livelihoods in the surrounding area have depended on agriculture, livestock rearing, artisanal fishing, trade, construction and income received from household members working elsewhere in Morocco or abroad. Previous NWM socioeconomic surveys indicated that remittances were an important source of household income, alongside fishing and agriculture.

A more recent survey undertaken for the 2024 NWM Resettlement Action Plan covered 61 landowners and identified a mixture of farmers, fishermen, merchants, labourers, retirees and Moroccan residents living abroad. These findings provide useful historical context but are not necessarily representative of current socioeconomic conditions in the communities closest to the SAF Project.



The wider area's economy is changing with the development of NWM, which is creating additional opportunities in construction, logistics, transport, port operations and industrial services.

The Project site is located on land already allocated for industrial development and administered by NWM. The land has previously been cleared and levelled, and no residential occupation, agricultural activities or other livelihood uses have been identified within its boundary. The Project itself is therefore not expected to require physical displacement or the acquisition of actively used agricultural or residential land.

Community infrastructure includes local roads, electricity, water supply arrangements, schools and basic healthcare services. Historical NWM studies reported electricity access for approximately 97% of households in Iaazzanene, while access to centralised water supply and sanitation was more limited. Approximately 3% of households were historically connected to a sewerage network, with many relying on individual sanitation arrangements. These figures are historical and require verification against current conditions.

Healthcare facilities within Iaazzanene have historically been limited, with residents relying on larger centres in Nador Province for specialised services. Primary education is available locally, while access to higher-level education and other public services generally requires travel to larger settlements.

Potentially vulnerable groups include elderly residents, persons with disabilities, low-income households, unemployed individuals, women facing barriers to economic participation and households dependent on traditional livelihoods. Previous NWM surveys identified relatively high proportions of elderly household heads and individuals with limited formal education among affected landowners. However, these findings relate to the wider NWM development and cannot be assumed to represent the communities surrounding the SAF Project.

Existing community health and safety considerations include increasing traffic, heavy vehicle movements, construction activities and the interaction between rural communities and the developing industrial workforce. The proximity of residential properties also makes air quality, noise and industrial safety important considerations for the Project.



7.0 Impact Identification, Assessment and Mitigation

7.1 Physical Environment

7.1.1 Climate

The CRVA report is under preparation and the assessment outcomes will be incorporated into the final ESIA and NTS.

7.1.2 Ambient Air Quality

7.1.2.1 Construction Phase - Impact: Increase in Air Pollutant Concentrations

Construction activities, including earthworks, excavation, material handling and vehicle movements, may temporarily increase dust and exhaust emissions within and around the Project site. The main pollutants of concern include particulate matter (PM₁₀ and PM_{2.5}), nitrogen oxides, sulphur dioxide and carbon monoxide.

The assessment considered a 250 m buffer around the Project site, which includes agricultural land and residential properties in Bouyafar, approximately 230 m from the Project boundary. These represent the receptors most likely to experience construction-related dust and temporary deterioration in air quality. Baseline monitoring identified particulate concentrations exceeding WHO air quality guidelines, meaning that construction dust could contribute to already elevated background concentrations. The impact is assessed as Medium significance before mitigation, reflecting the potential for temporary and localised deterioration in air quality beyond the Project boundary.

Mitigation measures will include water spraying of exposed surfaces and unpaved roads where practicable, speed restrictions, appropriate management and location of stockpiles away from sensitive receptors and covering vehicles transporting loose materials. Dust-generating activities will be reduced or suspended during high winds where emissions cannot be adequately controlled. Construction vehicles and machinery will be regularly maintained, unnecessary idling will be avoided, and complaints relating to dust or air quality will be addressed through the Project's grievance mechanism. With these measures, any remaining dust and emissions are expected to be temporary, localised and intermittent. The residual impact significance is assessed as Low.

7.1.2.2 Operation Phase

The Air Quality Modelling is under preparation and the outcomes will be incorporated into the final ESIA and NTS.

7.1.3 Ambient Noise Level

7.1.3.1 Construction Phase - Impact: Increase in Noise

Construction activities, including earthworks, foundation works, installation of processing equipment and storage tanks, operation of machinery and generators, and movement of heavy vehicles, will temporarily increase noise levels within and around the Project site. Noise may extend beyond the Project boundary and cause disturbance to nearby residential receptors, particularly in Bouyafar, where the closest properties are approximately 230 m away.

The assessment considered a 2 km area around the Project site, including residential, agricultural, commercial and industrial land uses. Although construction is expected to last approximately 19 months, individual noise-generating activities will occur intermittently and



for shorter periods. Noise levels will also decrease with distance from the construction activities. The impact is assessed as Medium significance before mitigation, reflecting the potential for noticeable but temporary noise disturbance at nearby residential properties.

Mitigation will include locating generators, workshops and other stationary noise sources away from residential receptors where practicable, using low-noise equipment, maintaining machinery and silencers, and limiting particularly noisy activities near residences to daytime hours where possible. Acoustic barriers will be considered where complaints are received or noise limits are exceeded. Nearby communities will be informed of potentially disruptive works, and targeted noise monitoring will be undertaken where appropriate in response to complaints. With these measures, substantial or sustained disturbance is not anticipated, although some temporary increases in noise may remain. The residual impact significance is assessed as Low.

7.1.3.2 Operation Phase

The Noise Modelling is under preparation and the outcomes will be incorporated into the final ESIA and NTS.

7.1.4 Soil and Groundwater

7.1.4.1 Construction Phase - Impact: Deterioration of Soil and Water Quality Through Contamination

Construction activities may result in soil and groundwater contamination through accidental spills or leaks of fuels, oils, chemicals and other hazardous substances, or inappropriate management of construction waste and wastewater. These risks are principally associated with material storage, refuelling, equipment maintenance and accidental releases.

Although the Project site has already been cleared and prepared for industrial development, the underlying permeable soils could allow contaminants to infiltrate towards groundwater. The Hydrology Report indicates that groundwater generally occurs at approximately 20 m below ground level, with reported depths ranging from 18 to 43 m. Most potential contamination events are expected to be small and localised, although larger uncontrolled releases could require remediation. The impact is assessed as Low significance before mitigation, as contamination would generally be associated with accidental events rather than routine construction activities.

Mitigation will include implementing Hazardous Materials and Waste Management Plans, storing fuels and chemicals in designated areas with secondary containment capable of holding at least 110% of the largest container, and undertaking refuelling and equipment maintenance on impermeable surfaces. Spill kits will be available, personnel will be trained in spill response, and equipment and storage areas will be regularly inspected. Any contaminated soil will be appropriately removed and managed through authorised waste contractors. Dewatering water, where generated, will be managed and treated as necessary before discharge or reuse. With these controls, significant contamination is considered unlikely, and the residual impact significance is assessed as Insignificant.

7.1.4.2 Operation Phase - Impact: Deterioration of Soil and Groundwater Quality Through Contamination

Operation of the Project will involve the receipt, storage, processing and transfer of liquid feedstocks, SAF, renewable diesel, bio-naphtha, fuels and process chemicals. Accidental spills, leaks or losses of containment from storage tanks, pipelines, process equipment and loading and unloading activities could result in soil and groundwater contamination.



The Project has already undertaken a preliminary Hazard Identification (HAZID) study, which identifies potential environmental hazards associated with storage tank failures and accidental releases during material transfer. A preliminary Quantitative Risk Assessment (QRA) has also been undertaken, identifying additional safeguards to reduce the likelihood and consequences of loss-of-containment events.

Importantly, the Project design already incorporates substantial pollution-prevention measures, including closed processing and transfer systems, secondary containment for liquid storage tanks designed to accommodate at least 110% of the largest tank, tank-level monitoring and overfill protection. Loading and unloading areas will incorporate impermeable surfaces, controlled drainage and oil-water interception, while closed-drain and oily-water collection systems will manage potentially contaminated liquids. The impact is assessed as Medium significance before mitigation, reflecting the potential for significant accidental releases to contaminate soil and, through the underlying permeable soils, potentially groundwater.

In addition to the existing design measures, the HAZID and QRA identify further safeguards for consideration during detailed engineering, including enhanced overfill protection, automatic isolation, dry-break and breakaway couplings, and additional containment and drainage controls. Operational measures will include regular inspection and preventive maintenance, hazardous materials management, spill detection and response procedures, and prompt containment and remediation of accidental releases. With the embedded design controls and operational mitigation measures, the residual impact significance is assessed as Insignificant.

7.1.5 Surface Water

7.1.5.1 Construction Phase - Impact: Deterioration of Surface Water Quality

Construction activities may affect surface water quality through sediment mobilisation and accidental releases of fuels, oils, chemicals, wastewater or other potentially contaminating substances. During intense rainfall, runoff could transport these materials beyond the Project site and into the wider BILZ drainage network.

No natural watercourse or surface water body occurs within the Project boundary. The nearest identified natural drainage feature is the Ighzer N'Tiya corridor, approximately 1 km away. Consequently, there is no direct surface water pathway from routine construction activities to a natural watercourse, and potential impacts would mainly arise during rainfall events or accidental releases. The impact is assessed as Low significance before mitigation.

Mitigation will include temporary drainage and sediment controls, appropriate management of excavated materials and stockpiles, storage of hazardous substances within impermeable and contained areas, and designated refuelling and maintenance areas. Construction wastewater, sanitary wastewater and concrete washout will be collected and managed appropriately, without uncontrolled discharge to soil or stormwater drains. Spill response procedures will be implemented, and drainage controls will be inspected following significant rainfall. With these measures, the likelihood of contaminated runoff leaving the Project site is expected to be reduced, and the residual impact significance is assessed as Insignificant.

7.1.5.2 Operation Phase

Impact: Deterioration of Surface Water Quality

Potential impacts on surface water quality during operation are principally associated with accidental releases of feedstocks, products, fuels or process chemicals, or contaminated runoff from process areas, storage tanks and loading and unloading facilities.



The Project does not discharge directly to a natural watercourse or Bétoya Bay. However, its stormwater drainage system is expected to connect to the wider BILZ drainage network, which could provide an indirect pathway for contaminated runoff to reach the receiving environment.

The Project design already incorporates pollution-prevention measures, including closed material-handling systems, secondary containment, impermeable process and storage areas, and segregation of clean stormwater from potentially contaminated runoff. Contaminated runoff will be managed through appropriate drainage and oil-water separation arrangements. The impact is assessed as Medium significance before mitigation.

The existing containment and drainage measures will be supported by operational inspection and maintenance, spill prevention and response procedures, and appropriate management of contaminated runoff and emergency firewater. The Hydrology Report also recommends provision of an isolation valve at the Project drainage outlet to prevent contaminated runoff from leaving the site during an accidental release or emergency. With implementation of these measures, the residual impact significance is assessed as Insignificant.

Impact: Increase in Stormwater Runoff and Pluvial Flood Risk

Development of the Project will result in an increase in impermeable surfaces within the approximately 8.8 ha Project site as the existing levelled and predominantly sandy surface is replaced by buildings, process areas, storage areas, internal roads and other paved or hardstanding areas. This will reduce rainfall infiltration and increase both the volume and rate of stormwater runoff generated from the Project site during rainfall events.

Under the existing site conditions, most rainfall is expected to infiltrate or evaporate, with appreciable surface runoff occurring principally during intense rainfall events. Once developed, runoff from roofs, roads, paved process areas and tank farms will be collected through the Project drainage system and conveyed to the wider BILZ stormwater network. This impact is assessed as Medium significance before mitigation.

A dedicated stormwater drainage system will be provided, with measures to collect and manage runoff from developed areas. Drainage infrastructure will be inspected and maintained, including following significant rainfall events, to preserve its capacity and address blockages or ponding. The residual significance of increased stormwater runoff and pluvial flood risk is assessed as Low.

7.1.6 Waste Management

7.1.6.1 Construction Phase - Impact: Generation and Management of Hazardous and Non-Hazardous Waste

Construction will generate hazardous and non-hazardous wastes, including concrete and rubble, scrap metal, timber, packaging materials, general domestic waste, used oils, chemical residues and contaminated materials. Inadequate segregation, storage or disposal could cause environmental contamination, litter and nuisance, as well as increase demand on waste treatment and disposal facilities. The impact is assessed as Medium significance before mitigation, reflecting the range of waste streams generated and the potential consequences of inappropriate management, particularly for hazardous waste.

A Construction Waste Management Plan will be implemented, prioritising waste prevention, reduction, reuse, recycling and recovery before disposal. Hazardous and non-hazardous wastes will be segregated and stored in designated areas, with hazardous wastes provided with appropriate containment. Reusable and recyclable materials will be recovered where practicable, while waste requiring treatment or disposal will be transferred to appropriately authorised facilities through authorised contractors. Waste quantities and disposal



arrangements will be recorded. Following mitigation, the residual impact significance is assessed as Low.

7.1.6.2 Operation Phase - Impact: Generation and Management of Hazardous and Non-Hazardous Waste

Operation will generate hazardous and non-hazardous waste, including spent catalysts, wastewater treatment sludge, spent filter media, waste oils, chemical residues, packaging and general domestic waste. Inappropriate management could result in environmental contamination, nuisance and increased demand on waste treatment and disposal facilities. The impact is assessed as Medium significance before mitigation.

An Operational Waste Management Plan will be implemented, applying the waste hierarchy and establishing requirements for waste identification, classification, segregation, storage, recovery and disposal. Hazardous wastes will be stored in designated secure areas with impermeable surfaces and appropriate containment. Spent catalysts will be directed to authorised recovery or recycling facilities where feasible, while wastewater sludge and other process residues will be characterised before determining suitable treatment or disposal routes. Only authorised waste transporters and management facilities will be used. Waste inventories, transfer records and disposal documentation will be maintained to provide traceability. With these measures, the residual impact significance is assessed as Low.

7.1.7 Wastewater Management

7.1.7.1 Construction Phase - Impact: Generation and Management of Construction Wastewater

Construction will generate wastewater from temporary sanitation and welfare facilities, equipment cleaning, hydrotesting, commissioning and dewatering, where required. If improperly managed, these wastewater streams could contaminate soil or groundwater or enter the wider drainage system. The impact is assessed as Low significance before mitigation.

Temporary wastewater collection and sanitation facilities will be provided, with wastewater appropriately stored, collected and disposed of through licensed contractors or approved facilities. Wastewater from construction activities will be managed according to its characteristics, with contaminated water treated or disposed of appropriately. Uncontrolled discharge to soil, stormwater drains or natural drainage features will not be permitted. Temporary wastewater infrastructure will be regularly inspected, and collection arrangements will be sufficient to prevent overflow. With these measures, the residual impact significance is assessed as Insignificant.

7.1.7.2 Operation Phase - Impact: Generation, Treatment and Discharge of Operational Wastewater

Operation is expected to generate approximately 612 m³/day of wastewater from process activities, utility systems and sanitary facilities. Approximately 304 m³/day of treated water is expected to be recovered for non-potable reuse, while approximately 306 m³/day of process and sanitary effluent will require treatment before discharge to the receiving wastewater system.

Untreated process wastewater may contain organic matter, oils and other contaminants and may have an acidic pH. Inadequate treatment or uncontrolled discharge could affect the receiving wastewater infrastructure and downstream environmental receptors.

The wastewater treatment system is currently designed to achieve treated effluent concentrations below 125 mg/L COD, 30 mg/L BOD₅, 50 mg/L suspended solids and 5 mg/L



oils and fats, with a pH of 6.0–9.0. However, the final BILZ wastewater acceptance criteria and guaranteed effluent quality for all relevant parameters remain to be confirmed. The assessment identifies the impact as High significance before mitigation.

Mitigation will include separate treatment systems for wastewater intended for reuse and wastewater requiring discharge, confirmation of applicable Moroccan requirements and BILZ acceptance criteria, incorporation of these requirements into the final treatment design, and establishment of treatment performance guarantees.

Treated effluent will be monitored before discharge. Where non-compliance is identified, the cause will be investigated, corrective action implemented and compliance confirmed before normal discharge resumes. Wastewater treatment equipment and associated infrastructure will be regularly inspected and maintained, with appropriate containment and isolation arrangements to prevent uncontrolled releases. The residual impact significance is assessed as Low subject to the required design and compliance measures.

7.1.8 Archaeology and Cultural Heritage

7.1.8.1 Construction Phase - Impact: Disturbance or Loss of Previously Unidentified Archaeological or Cultural Heritage Resources

Construction earthworks and excavation could accidentally disturb previously unidentified archaeological remains. Although no archaeological features were identified within the Project boundary during the September 2026 walkover, the possibility of buried remains cannot be entirely excluded.

The likelihood of encountering archaeological material is considered low, particularly given the previously disturbed condition of the site. However, any damage to archaeological resources could be permanent and irreversible. The impact is therefore assessed as Low significance before mitigation.

A Chance Find Procedure will be implemented during construction. If suspected archaeological remains are discovered, work in the affected area will cease, the location will be protected and the relevant authorities will be notified. Works will only resume following the appropriate assessment and authorisation. The residual impact significance is assessed as Insignificant.

7.1.8.2 Operation Phase

During operation, no impacts on archaeology or cultural heritage are anticipated, as all ground-disturbing activities will have been completed during the construction phase.

7.1.9 Landscape and Visual Amenities

7.1.9.1 Construction Phase - Impact: Temporary Changes to Landscape Character and Visual Amenity

Construction will temporarily change the appearance of the Project site through cranes, construction machinery, temporary facilities, material stockpiles, lighting and partially completed structures. The erection of storage tanks and elevated processing equipment will be particularly visible from surrounding areas.

Potential visual receptors include residents of Bouyafar and Sammara, road users and workers in neighbouring industrial areas. However, the Project is located within the designated Energy Zone of BILZ, where industrial development is already planned and underway. Construction-related visual changes will therefore occur within an increasingly industrial landscape. The impact is assessed as Low significance before mitigation.



Mitigation will include restricting construction activities and temporary facilities to designated areas, maintaining orderly storage of materials and waste, removing temporary structures when no longer required and directing construction lighting towards working areas to minimise glare and light spill. Areas disturbed during construction but not required for permanent infrastructure will be reinstated. The residual impact significance is assessed as Insignificant.

7.1.9.2 Operation Phase - Impact: Permanent Changes to Landscape Character and Visual Amenity

Operation will introduce permanent industrial infrastructure, including process equipment, storage tanks, buildings, stacks, pipework and external lighting. These structures will change the appearance of the currently cleared site and may be visible from surrounding settlements and roads.

However, the Project is located within the designated Energy Zone of BILZ, and its infrastructure is consistent with the planned industrial character of the wider NWM development. The impact is assessed as Low significance before mitigation.

Mitigation will include considering visual effects in the final layout and design, using finishes appropriate to the industrial setting, avoiding highly reflective surfaces where practicable, and limiting external lighting to operational, safety and security needs. Lighting will be directed and shielded to minimise glare and unnecessary light spill, and the site will be maintained in an orderly condition. The residual impact significance remains Low.

7.1.10 Traffic and Transportation

7.1.10.1 Construction Phase - Impact: Traffic, Transport and Road Safety

Construction will generate additional vehicle movements associated with material deliveries, heavy equipment, waste transport and the construction workforce. Traffic estimates indicate approximately 44 one-way vehicle movements per day during earthworks, 35 during normal construction activities and up to 125 during peak construction, including approximately 65 heavy vehicle movements per day.

The highest traffic volumes are expected during Months 8–14, with workforce movements concentrated around morning and evening shift changes. Increased traffic could result in temporary congestion, disruption to other road users, road deterioration and increased accident risks.

Heavy and abnormal loads, including major process equipment, are expected to arrive through NWM Port and travel approximately 4 km to the Project site using the port and primary access routes, avoiding public roads. The alternative route through Izarrouan will not be used for freight or heavy vehicles. The impact is assessed as Medium significance before mitigation.

A Construction Traffic Management Plan will be implemented, covering designated routes, delivery scheduling, coordination of heavy vehicle movements, worker transport, speed restrictions and road safety requirements. Heavy and abnormal loads will be coordinated with NWM and the relevant authorities. Appropriate signage and traffic marshals will be provided where required, and road conditions, accidents and community complaints will be monitored. With these measures, the residual impact significance is assessed as Low.

7.1.10.2 Operation Phase - Impact: Traffic, Transport and Road Safety

Operation is expected to generate approximately 27 one-way vehicle movements per day, comprising workforce transport, light service vehicles, heavy goods vehicles and tanker



deliveries. These movements may increase interactions with other road users and create risks of traffic disruption, accidents and road deterioration.

Product transport to NWM Port and imported feedstock movements, where applicable, will use the approximately 4 km port and primary access route, predominantly through industrial areas. The alternative route through Izarrouan will not be used for freight, while domestic feedstock deliveries will continue to use the public road network and RN16. The impact is assessed as Medium significance before mitigation.

Operational traffic management measures will address designated vehicle routes, safe loading and unloading, driver competence, vehicle maintenance, speed controls, scheduling and monitoring of traffic-related incidents and complaints. With these measures, the residual impact significance is assessed as Low.

7.2 Biological Environment

7.2.1 Construction Phase

Impact: Habitat Loss and Disturbance to Fauna

The Project site has already been cleared and prepared for industrial development, and no additional clearance of natural habitat is currently required. Significant habitat loss or fragmentation is therefore not anticipated.

Nevertheless, construction machinery, vehicle movements, noise, vibration and increased human activity could temporarily disturb birds, reptiles or mammals that occasionally use the site or its immediate surroundings. There is also a limited risk of injury or mortality to individual animals during earthworks or vehicle movements. The impact is assessed as Very Low significance before mitigation.

Construction activities, vehicle movements and material storage will be restricted to designated areas. Unnecessary disturbance of habitats outside the Project boundary will be avoided, and vehicle speed limits will be applied to reduce wildlife collision risks. Workers will receive basic wildlife-awareness training, and the intentional capture, hunting, feeding or harming of wildlife will be prohibited. Open excavations will be covered or provided with escape measures where animals could become trapped. With these measures, the residual impact significance is assessed as Insignificant.

Impact: Introduction and Spread of Invasive Alien Species

Construction machinery, vehicles, imported fill and landscaping materials could introduce or spread invasive alien plant species. Although the Project site is largely unvegetated, invasive plants could establish along disturbed margins, drainage areas or landscaped areas and subsequently spread into surrounding habitats. The impact is assessed as Low significance before mitigation.

Fill, topsoil and landscaping materials will be obtained from reputable sources, and machinery previously used in vegetated areas will be inspected and cleaned where necessary. Known invasive species will not be intentionally introduced through landscaping. Disturbed areas will be inspected for invasive plants, which will be removed before becoming established. The residual impact significance is assessed as Insignificant.

Impact: Dust, Runoff and Accidental Pollution Impacts on Terrestrial Habitats and Fauna

Construction activities may generate dust, sediment-laden runoff and accidental releases of fuels, oils or chemicals that could affect vegetation and fauna outside the Project boundary. As the Project footprint is already modified, these indirect pollution pathways are considered



more relevant than direct vegetation clearance. The impact is assessed as Very Low significance before mitigation, reflecting the limited extent and expected short duration of potential effects.

Mitigation will include dust suppression, covering vehicles transporting loose materials, controlling vehicle speeds, temporary drainage and sediment controls, contained storage of fuels and chemicals, designated refuelling areas, spill response procedures and appropriate waste management. Where visible dust deposition occurs on vegetation outside the Project boundary, dust-control measures will be reviewed and strengthened. With these measures, the residual impact significance is assessed as Insignificant.

7.2.2 Operation Phase

Impact: Disturbance to Fauna from Lighting, Noise and Routine Activity

Operation will introduce permanent sources of lighting, machinery noise, traffic and human activity, which could discourage some wildlife from using areas near the Project boundary. Artificial lighting may also affect nocturnal fauna and transient birds.

Given the already modified nature of the Project site and its location within an industrial development zone, these effects are expected to be limited. The impact is assessed as Very Low significance before mitigation.

Mitigation will include restricting external lighting to operational and security needs, directing lights downward and towards operational areas, using appropriate shielding, avoiding unnecessary continuous illumination and maintaining machinery to minimise noise. The residual impact significance is assessed as Insignificant.

Impact: Introduction and Spread of Invasive Alien Species

Landscaping and vegetation management during operation could introduce or allow invasive alien plant species to establish within the Project site and spread into surrounding habitats. The impact is assessed as Low significance before mitigation.

Landscaping will favour locally appropriate native or non-invasive species. Landscaped areas, drainage margins and other vegetated areas will be periodically inspected, and invasive species will be removed before becoming established. The movement of soil or vegetation containing invasive plant material will be avoided. The residual impact significance is assessed as Insignificant.

Impact: Accidental Spills, Contaminated Runoff and Wastewater

Accidental releases of feedstocks, products, chemicals or contaminated water could affect vegetation and fauna outside the Project footprint. These impacts would arise from abnormal events rather than routine operation. The impact is assessed as Very Low significance before mitigation.

The containment, drainage, wastewater management, spill prevention and waste management measures described in the physical environment assessment will also protect terrestrial biodiversity. Where a significant release extends beyond the developed Project area, the affected land will be inspected for impacts on vegetation and fauna, with remediation undertaken where required. The residual impact significance is assessed as Insignificant.

Impact: Waste and Attraction of Opportunistic Fauna

Improperly stored domestic or industrial waste could attract birds, rodents and other opportunistic animals, potentially changing wildlife behaviour and increasing interactions with operational areas. The impact is assessed as Very Low significance before mitigation.



Waste will be stored in secure, covered containers, with food waste and other attractants promptly removed. Waste storage areas will be maintained in a clean condition, and persistent wildlife attraction will be addressed by identifying and removing its source. Any necessary fauna control will comply with Moroccan requirements and will not involve indiscriminate killing or poisoning. The residual impact significance is assessed as Insignificant.

7.3 Socio-economic Environment

7.3.1.1 Construction Phase

Impact: Labour Influx and Worker–Community Interactions

Construction is expected to require a peak workforce of approximately 400 workers, comprising local and non-local personnel. Non-local workers will be accommodated in existing apartments, hotels or guesthouses in urban centres such as Nador, Selouane and Beni Ensar. No worker accommodation camp will be established within the Project site or NWM zone.

The temporary presence of non-local workers may increase interactions with surrounding communities and create risks of inappropriate behaviour, social tensions, harassment and gender-based violence and harassment (GBVH). These risks are expected to be concentrated mainly in the urban areas where workers are accommodated. The impact is assessed as Medium significance before mitigation.

The Client has established an Environmental, Social, Health and Safety (ESHS) Policy which includes commitments relating to community health and safety, worker conduct and grievance arrangements. The Client's Human Resources (HR) Policy and Construction Environmental and Social Management Plan (CESMP) also establish requirements addressing workplace conduct, harassment and GBVH.

These requirements will be implemented through the EPC Contractor and subcontractors, supported by worker induction and training, a Code of Conduct, organised worker transport and accessible grievance mechanisms for workers and communities. With these measures, the residual impact significance is assessed as Low.

Impact: Pressure on Community Infrastructure and Services

The construction workforce may temporarily increase demand for accommodation, healthcare, shops, restaurants and other services, particularly during peak workforce mobilisation.

However, only a proportion of the approximately 400 workers is expected to be recruited from outside the area, and non-local workers will be accommodated across established urban centres rather than surrounding rural communities. The impact is assessed as Low significance before mitigation.

Mitigation will include prioritising local recruitment, assessing the suitability and availability of worker accommodation, avoiding excessive concentration of workers in individual facilities, and providing organised transport and appropriate on-site welfare and first-aid arrangements. Worker accommodation will be required to meet applicable national requirements and the IFC/EBRD guidance on workers' accommodation. The residual impact significance remains Low.



Impact: Community Health, Safety and Security

Construction activities may create risks to surrounding communities through vehicle movements, hazardous material handling, fires, accidents and interactions with construction personnel or security staff.

The Project is located within the fenced and access-controlled BILZ industrial development area, with no residential receptors inside the Project boundary. This substantially limits the likelihood of public exposure to on-site construction hazards. Potential community risks will mainly arise through transport movements, workforce interactions and accidental incidents requiring external emergency response. The impact is assessed as Low significance before mitigation.

The Client's existing ESHS Policy establishes commitments relating to community health, safety, security, emergency preparedness and grievance management. These requirements will be implemented through the EPC Contractor and the CESMP (Annex 9).

Key measures include maintaining secure site boundaries and controlled access, implementing hazardous materials management and emergency response procedures, coordinating with NWM and emergency services, and ensuring appropriate conduct and training of security personnel. Community incidents and complaints will be investigated through the Project's grievance mechanism. The residual impact significance remains Low.

Impact: Employment, Recruitment and Working Conditions

Construction will involve the EPC Contractor, subcontractors and potentially recruitment agencies. This creates risks of inconsistent labour practices, including unclear employment terms, inappropriate recruitment fees, delayed wages, excessive working hours, discrimination, harassment, forced or child labour, and restrictions on freedom of movement or association.

These risks may be greater for workers employed through lower-tier subcontractors or recruitment intermediaries, particularly non-local workers who depend on employers for transport or accommodation. The impact is assessed as Low significance before mitigation.

The Client has already established an HR Policy, covering recruitment, employment conditions, remuneration, working hours, equal opportunities, worker representation, harassment and grievances. The ESHS Policy includes additional commitments relating to worker welfare, gender equality and GBVH prevention, while the dedicated Child Labour Policy establishes requirements for preventing, identifying and addressing child labour.

These existing policies will be implemented through a Project-specific Labour Management Plan and incorporated into EPC Contractor and subcontractor requirements. Measures include transparent recruitment, written employment contracts, prohibition of recruitment fees and forced labour, timely wage payments, protection of workers' identity documents and freedom of association, confidential worker grievance arrangements and regular contractor labour audits.

Impact: Supply Chain Risks

Construction will require materials, machinery and specialist equipment from local, national and international suppliers. Workers employed by primary suppliers may face risks associated with child or forced labour, unsafe working conditions, inadequate remuneration, excessive working hours, discrimination or harassment.

The detailed construction supply chain has not yet been fully defined, and no specific significant labour or human rights issues have been identified. Nevertheless, the impact is assessed as Low significance before mitigation.



The Client has established a Supply Chain Management System (SCMS) including a Responsible Collection Policy and Supplier Code of Conduct. These establish a risk-based framework for supplier screening, onboarding, auditing, monitoring and corrective action. Although principally developed for the operational feedstock supply chain, relevant SCMS requirements will also be applied to construction procurement through the EPC Contractor.

The Client's ESHS Policy and Child Labour Policy will also be incorporated into supplier-management arrangements. Primary suppliers will undergo risk-based screening for labour, human rights and occupational safety risks, with enhanced due diligence for higher-risk suppliers. Corrective actions and remediation will be required where significant concerns are identified, with responsible disengagement considered where risks cannot be adequately addressed. The residual impact significance is assessed as Very Low.

Impact: Occupational Health and Safety Risks

Construction workers will be exposed to hazards associated with heavy machinery, lifting operations, working at height, excavations, electrical works, confined spaces, hazardous substances, noise and dust. Serious incidents could result in injury or fatalities, particularly where multiple contractors operate simultaneously. The impact is assessed as Medium significance before mitigation.

The Client's ESHS Policy provides an overarching framework for worker health and safety, which will be implemented through a Project-specific Occupational Health and Safety Management Plan applicable to the EPC Contractor and subcontractors.

Key measures include task-specific risk assessments, permit-to-work systems, lifting and electrical safety procedures, competent supervision, personal protective equipment, worker training, occupational exposure controls and emergency preparedness. Contractor performance will be monitored through inspections, incident investigations and audits. The residual impact significance is assessed as Low.

Impact: Temporary Employment and Skills Development

Construction is expected to create approximately 400 jobs at peak activity, including skilled, semi-skilled and unskilled positions. Opportunities may also arise for technical training and on-the-job skills development, potentially improving future employment prospects. This represents a Medium positive impact.

The EPC Contractor and subcontractors will prioritise suitably qualified local workers where practicable, communicate vacancies through appropriate local channels and provide training opportunities where feasible. Recruitment will be transparent and non-discriminatory, consistent with the Client's HR Policy, and the temporary nature of construction employment will be clearly communicated.

Impact: Local Procurement and Economic Benefits

Construction will generate demand for materials, transport, logistics, accommodation, catering and other services, creating opportunities for businesses within Nador and the wider region. The extent of these benefits will depend on local supplier capacity and the proportion of Project expenditure retained within the local economy. This represents a Medium positive impact.

The EPC Contractor and subcontractors will identify opportunities to procure goods and services locally where suppliers meet the required technical, quality, health and safety, and commercial standards. Local businesses will receive appropriate information about procurement opportunities, and transparent, non-discriminatory procurement procedures will be applied. Records of local procurement will be maintained to monitor the Project's contribution to the local economy.



7.3.1.2 Operation Phase

Impact: Labour Influx and Worker–Community Interactions

Operation is expected to require approximately 162 workers, including locally recruited personnel and workers from outside the area. Non-local workers are expected to reside in established urban centres within the wider Nador area, rather than in dedicated accommodation within the Project site or NWM zone.

The operational workforce will be smaller than the peak construction workforce, and significant demographic changes or disruption to surrounding communities are not anticipated. Nevertheless, interactions between workers and local communities could give rise to inappropriate behaviour, social tensions, harassment or GBVH. The impact is assessed as Low significance before mitigation.

The Client's existing ESHS Policy and HR Policy establish requirements concerning worker conduct, harassment, GBVH and community interactions. These requirements will be maintained during operation through worker conduct standards, training, appropriate management of worker accommodation and accessible grievance arrangements. Local recruitment will be prioritised where suitably qualified workers are available. The residual impact significance remains Low.

Impact: Pressure on Community Infrastructure and Services

The operational workforce may create additional demand for accommodation, healthcare, shops, restaurants and other community services. However, the relatively limited workforce of approximately 162 employees and the use of established urban centres for non-local workers are expected to reduce pressure on individual communities and facilities. The impact is assessed as Low significance before mitigation.

Mitigation will include prioritising local recruitment, ensuring appropriate accommodation arrangements for non-local workers and maintaining suitable worker welfare and occupational health facilities. Community concerns relating to pressure on local services will be monitored and addressed where necessary. The residual impact significance is assessed as Very Low.

Impact: Community Health, Safety and Security

The operation of the Project will involve the processing, storage and handling of flammable, pressurised and potentially toxic substances, including hydrogen, bio-propane and hydrogen sulphide (H₂S). Accidental releases, fires or explosions could pose risks to workers, neighbouring industrial facilities, road users and surrounding communities.

The Project has already undertaken a preliminary Hazard Identification (HAZID) study and a Quantitative Risk Assessment (QRA) to identify and assess major accident hazards and inform the Project design. The HAZID identified 110 potential hazard scenarios, while the QRA assessed 36 major accident scenarios associated with processing facilities, storage, utilities and loading and unloading operations. The principal risks relate to bio-propane storage and loading, high-pressure hydrogen systems, the steam methane reformer and H₂S-bearing streams.

Importantly, the preliminary QRA confirms that the identified risk-control measures have been incorporated into the Project design. These include emergency shutdown and automatic isolation systems, gas detection, fire protection and fixed water-deluge systems, breakaway couplings and other safeguards intended to prevent accidental releases and limit their consequences.

Nevertheless, the QRA identifies certain scenarios where fire, explosion or toxic-release consequences could extend beyond the Project boundary, including potential effects on



neighbouring industrial facilities and surrounding receptors. The impact is therefore assessed as Medium significance before mitigation.

The Client's existing ESHS Policy establishes the overarching framework for community health and safety, emergency preparedness, incident management and grievance management. This is supported by the Project's HAZID and QRA, which provide a structured basis for identifying hazards, incorporating engineering safeguards and managing major accident risks.

As the HAZID and QRA were undertaken at a preliminary design stage, their findings will be validated and updated as the design progresses. This will include closing out HAZID recommendations, undertaking further process-safety studies, verifying the implementation and effectiveness of design safeguards, and completing a detailed QRA using the final Project layout and verified receptor information. The detailed QRA will assess individual and societal risks and demonstrate acceptable off-site risks before operation.

A comprehensive Emergency Preparedness and Response Plan will also be implemented and coordinated with NWM/BILZ, Civil Protection and other relevant authorities, including arrangements for emergency communication, response and joint drills.

With the safeguards already incorporated into the design and the additional verification and operational management measures identified, the residual impact significance is assessed as Low on a provisional basis, subject to completion of the detailed QRA and confirmation that off-site risks are acceptable.

Impact: Employment, Recruitment and Working Conditions

Operation will create long-term employment for approximately 162 workers. Potential adverse impacts include inappropriate recruitment practices, excessive working hours, delayed wages, discrimination, harassment, restrictions on freedom of association and risks of forced or child labour, particularly where contracted workers or recruitment intermediaries are involved. The impact is assessed as Low significance before mitigation.

The Client's existing HR Policy provides the principal framework for operational employment and labour management, covering recruitment, equal opportunities, remuneration, working hours, overtime, worker representation, workplace conduct and grievances. This is supported by the ESHS Policy, which addresses worker health and safety, training, gender equality and GBVH prevention, and the Child Labour Policy, which establishes requirements for child labour prevention and age verification.

These policies will be maintained and applied to direct and contracted workers through employment procedures, contractor oversight, transparent recruitment, written employment terms, payroll and working-hour controls, worker protection measures and confidential grievance arrangements. The residual impact significance remains Low.

Impact: Supply Chain Risks

Operation will require the continuous supply of used cooking oil and other eligible waste and residue feedstocks. The supply chain may involve multiple collection points, aggregators, storage facilities, transporters and suppliers across different geographical areas.

Potential risks include child and forced labour, unsafe working conditions, excessive working hours, inadequate remuneration, discrimination and harassment. These risks may be more difficult to identify and manage where supply chains are geographically dispersed or involve multiple tiers of intermediaries.

The ESIA does not identify existing child labour within the Client's supply chain. Nevertheless, the potential severity of labour and human rights violations requires systematic management. The impact is assessed as Medium significance before mitigation.



The Client has developed a dedicated Supply Chain Management System (SCMS), including a Responsible Collection Policy (RCP) and Supplier Code of Conduct (SCoC). These establish requirements covering feedstock from its Point of Origin through aggregation, storage and transportation to the Project site.

The SCMS provides for supplier prequalification, risk-based screening and onboarding, digital traceability, supplier audits and inspections, monitoring, corrective action and management of non-compliant suppliers. The Client's Child Labour Policy establishes additional requirements for age verification, monitoring and remediation.

During operation, the SCMS, RCP and SCoC will be implemented across the applicable supply chain. Higher-risk suppliers will be subject to enhanced due diligence and monitoring, and identified non-compliances will require corrective action and remediation. Where significant risks cannot be adequately managed, the SCMS provides for escalation and responsible disengagement. With these measures, the residual impact significance is assessed as Low.

Impact: Occupational Health and Safety Risks

Operation of the SAF facility will involve occupational and process-safety hazards associated with high-pressure equipment, flammable and toxic substances, machinery, electrical systems and maintenance activities. Potential incidents include fires, explosions, toxic gas releases, equipment failures and occupational exposure to hazardous substances, which could result in serious injuries or fatalities.

The Project has already undertaken a preliminary HAZID and QRA to systematically identify major accident hazards and assess potential consequences. These studies have informed the Project design and identified engineering and operational safeguards, particularly for hydrogen generation and hydroprocessing systems, H₂S-bearing streams, bio-propane storage and loading, and other safety-critical equipment.

The Project design incorporates safety measures identified through these studies, including emergency shutdown and isolation systems, gas detection, fire protection and other process-safety controls. The Client's existing ESHS Policy also establishes requirements for occupational health and safety, worker competency, training, emergency preparedness and incident management.

Despite these safeguards, the inherent hazards associated with the operation of a complex processing facility mean that the impact is assessed as High significance before mitigation.

An operational Occupational Health and Safety Management System will be developed and implemented, integrating occupational health and safety with process-safety management and applying to employees and contractors. The preliminary HAZID and QRA recommendations will be closed out, supported by further studies including HAZOP, SIL/LOPA, hazardous-area classification, fire and explosion analysis, and a detailed QRA as engineering progresses.

Operational controls will include permit-to-work procedures for high-risk activities, preventive maintenance and integrity inspections of safety-critical equipment, worker training and competency requirements, occupational exposure monitoring, appropriate personal protective equipment, and fatigue management. Emergency response procedures will address fires, explosions, toxic gas releases, major spills and medical emergencies, supported by suitable firefighting, rescue and first-aid equipment. With implementation of the existing design safeguards and the operational safety management measures, the residual impact significance is assessed as Low.



Impact: Long Term Employment and Skills Development

Operation is expected to create approximately 162 long-term jobs across technical, operational, maintenance, administrative and supporting functions. Employment and training may improve local skills and provide opportunities for workers to develop experience in specialised renewable-fuel manufacturing.

Some technical and managerial positions may initially require specialised qualifications or experience, potentially limiting immediate local participation. However, training and competency development could progressively increase opportunities for suitably qualified workers from the Nador area. This is assessed as a Medium positive impact.

The Client's existing HR Policy establishes commitments to equal employment opportunity, local recruitment, training and employee development. To enhance the benefits, local and regional recruitment will be prioritised where practicable, transparent recruitment procedures will be maintained, and technical training, on-the-job learning and career development opportunities will be provided. Local employment and training performance will be monitored.

Impact: Local Procurement and Economic Benefits

Operation will generate ongoing demand for feedstocks, materials, consumables, maintenance, logistics and other supporting services. The planned sourcing of some used cooking oil from domestic suppliers may create opportunities for businesses involved in collection, aggregation, storage and transportation.

However, certain specialised equipment, process inputs and technical services may need to be sourced internationally. The extent of economic benefits will therefore depend on the proportion of expenditure retained within Morocco. This is assessed as a Medium positive impact.

The Client will prioritise suitable local and national suppliers where they meet technical, quality, sustainability, environmental and social, and commercial requirements. The Project's existing feedstock sourcing and supplier-management arrangements will support participation by eligible domestic suppliers while maintaining traceability and sustainability requirements. Procurement opportunities will be communicated transparently, and local and national supplier participation and expenditure will be monitored.

Impact: Contribution to Morocco's Renewable Fuels Industry and Green Industrial Development

The Project will establish domestic production capacity for SAF and associated renewable fuels, including renewable diesel, renewable naphtha and bio-propane. Finished products are expected to be principally exported through NWM Port, while renewable diesel and bio-propane may also be supplied to the domestic market.

The Project may contribute to industrial diversification, domestic feedstock supply chains, technical skills development, technology transfer and export activity. However, the scale of these wider benefits cannot yet be quantified and will depend on domestic sourcing, product distribution, export volumes and the extent of economic activity retained within Morocco. This is assessed as a Medium positive impact.

To enhance these benefits, the Client will seek to maximise participation by suitable Moroccan businesses in feedstock collection, logistics, maintenance and other services, prioritise domestic sourcing where feasible, and support technical knowledge transfer through training and participation in Project activities. Opportunities for domestic distribution of renewable fuel products will also be considered, and the Project's contribution to domestic sourcing, product sales and export activity will be monitored.



7.4 Cumulative Impacts

The cumulative impact assessment will be included in the next iteration of the ESIA and NTS.



8.0 Stakeholder Consultation, Participation and Disclosure

Stakeholder engagement is an important component of the Project's ESIA, intended to inform affected communities and other stakeholders about the Project, understand their concerns and expectations, and ensure that relevant feedback is considered in the assessment and development of mitigation measures. The engagement process is being undertaken in accordance with applicable Moroccan regulatory requirements and, to the extent possible, EBRD Environmental and Social Requirement 10 (ESR 10).

The wider NWM development has been subject to extensive stakeholder engagement through previous environmental and social assessments, public inquiries, socioeconomic surveys and consultations with surrounding communities, local authorities and other stakeholders. NWM has also established a Stakeholder Engagement Plan (SEP) and external grievance mechanism. Previous consultations identified concerns relating to land acquisition and livelihoods, community health and safety, industrial activities, traffic, environmental impacts and local employment opportunities. While land acquisition and displacement concerns relate principally to the wider NWM development and are not expected to arise directly from the Project, the other issues remain relevant and have been considered in the ESIA.

Project-specific stakeholder engagement is planned for 15–16 October 2026, targeting communities within approximately 2 km of the Project, including Sammar, Imhiaten and Bouyafar. The consultations will be undertaken by CLEAN TECH, under SLR's supervision and in coordination with NWM and local authorities. They will include discussions with community representatives and separate focus group discussions with male and female residents, with consideration given to the participation of vulnerable groups.

The consultations will introduce the Project, explain its proposed activities, potential environmental and social impacts, mitigation measures and anticipated employment and economic opportunities. They will also provide an opportunity for communities to raise concerns and help verify the socioeconomic baseline.

At the time of preparation of the current ESIA, the Project-specific consultations had not yet been completed. Their findings, including stakeholder concerns and the Project's responses, will be incorporated into the final ESIA and stakeholder engagement arrangements. The Project will also consider NWM's existing engagement framework and grievance mechanism to support coordination and communication with surrounding communities.

8.1 Project Stakeholder Engagement

The details of the stakeholder engagement activities and outcomes will be included in the next iteration of the ESIA and NTS following completion of the planned stakeholder engagement.



9.0 Environmental and Social Management Plan

The ESMP will be completed in the final ESIA and NTS, incorporating the mitigation, management and monitoring measures identified through the assessment of the Project's environmental and social impacts.





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