GREEN SKY CAPITAL
SUSTAINABLE AVIATION FUEL
ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT
NON-TECHNICAL SUMMARY REPORT

12 November 2026

1. INTRODUCTION AND BACKGROUND

1.1 INTRODUCTION

Green Sky Capital (GSC) is proposing to develop a Sustainable Aviation Fuel (SAF) production facility to be located in the Nador Province of the Oriental Region in north-eastern Morocco.

SAF is a lower-carbon alternative to conventional jet fuel, produced from non-fossil sources such as waste oils and residues. It can be blended with conventional jet fuel and used in existing aircraft, helping to reduce aviation-related greenhouse gas emissions. The Project will use waste-derived oils and fats to produce approximately 176,000 tonnes of SAF annually, alongside renewable diesel, renewable naphtha and small quantities of bio-propane. 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. Finished products are intended to be exported through the port.

Green Sky Capital intends to seek international project financing from the European Bank for Reconstruction and Development (EBRD).

SLR Consulting (SLR), in collaboration with CLEAN TECH, a local environmental consultant in Morocco, have been appointed by GSC to undertake the Environmental and Social Impact Assessment (ESIA) for the Project. This Non-Technical Summary (NTS) presents the key findings of the ESIA undertaken for the Project. It provides an accessible overview of the Project, the existing environmental and social conditions, the potential impacts associated with construction and operation, and the proposed mitigation and monitoring measures. The NTS also summarises the stakeholder engagement activities undertaken and the measures established to manage the Project's environmental and social performance throughout its lifecycle.

2. REGULATORY AND INSTITUTIONAL FRAMEWORK

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

2.1 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 the applicable. Environmental and Social themes and requirements. Relevant permits and approvals must be obtained before construction, commissioning or operation, as applicable.

2.2 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), , biodiversity (ESR 6), cultural heritage (ESR 8), and stakeholder engagement and information disclosure (ESR 10). ESR 5, ESR 7 and ESR 9 are not applicable to the Project.

2.2 INTERNATIONAL LENDER REQUIREMENTS

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.

2.3 APPROACH TO THE ESIA

The ESIA 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.

- Gathering and evaluating baseline information to characterise the affected biophysical, cultural and socio-economic environment.
- Identifying national, international, and corporate management requirements that the Project must satisfy.
- Assessing the overall effectiveness of environmental laws and regulations in managing the environmnetal impacts.
- Undertaking consultation with stakeholders and promoting full disclosure of information and transparency regarding the ESIA process.
- Identifying, defining and evaluating the current environmental and social impacts that need to be addressed.
- Developing an environmental and social management framework that sets out key mitigation measures and monitoring objectives and where required, propose remedial measures.

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.

3. PROJECT LOCATION

The Project is located in northeastern Morocco, within the Oriental Region and the Province of Nador. More specifically, the Project is situated within the rural commune of Iaazzanene, approximately 30 km west of the city of Nador, on the Mediterranean coast. The wider area is characterised by the Bay of Betoya and lies along the western side of the Cap des Trois Fourches. The NWM development is located in the vicinity of the mouth of the Oued Kert.

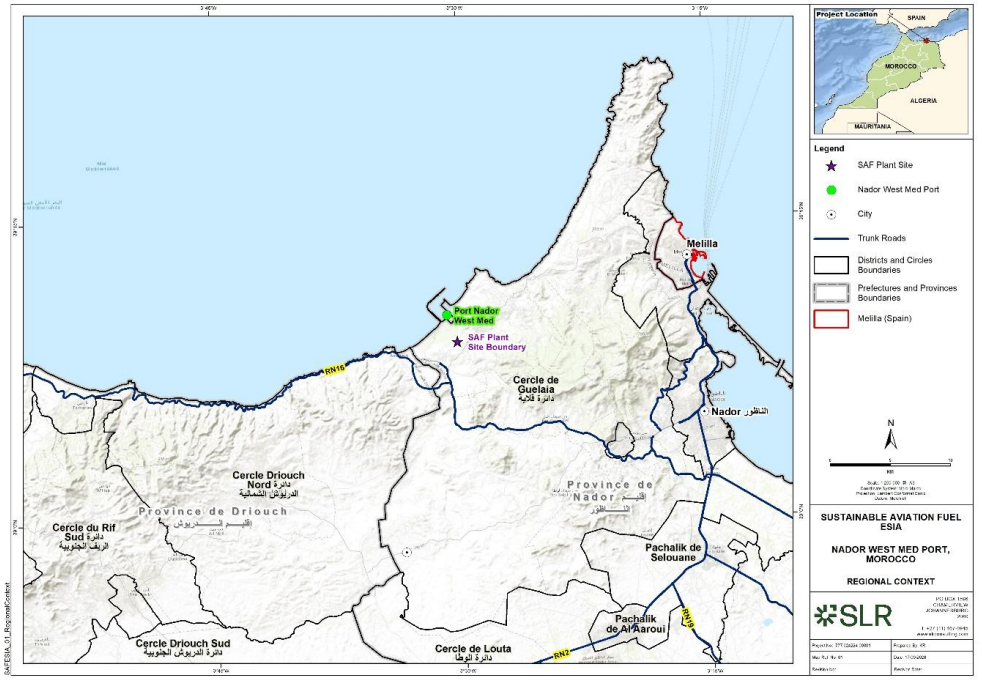


Figure 3-1 Project Regional Location

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 Project will occupy Plots 14 and 17 of Block H-F, within Phase 1.1 of the Energy Zone (Figure 3-2) covering

approximately 8.8 hectares shown on Figure 3-3. Access to the Project site will be provided through the existing and planned road network serving BILZ and the wider NWM Complex.

The surrounding area includes planned industrial and logistics developments, agricultural land and rural settlements, including Imhiaten and Sammara. The nearest 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. 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.

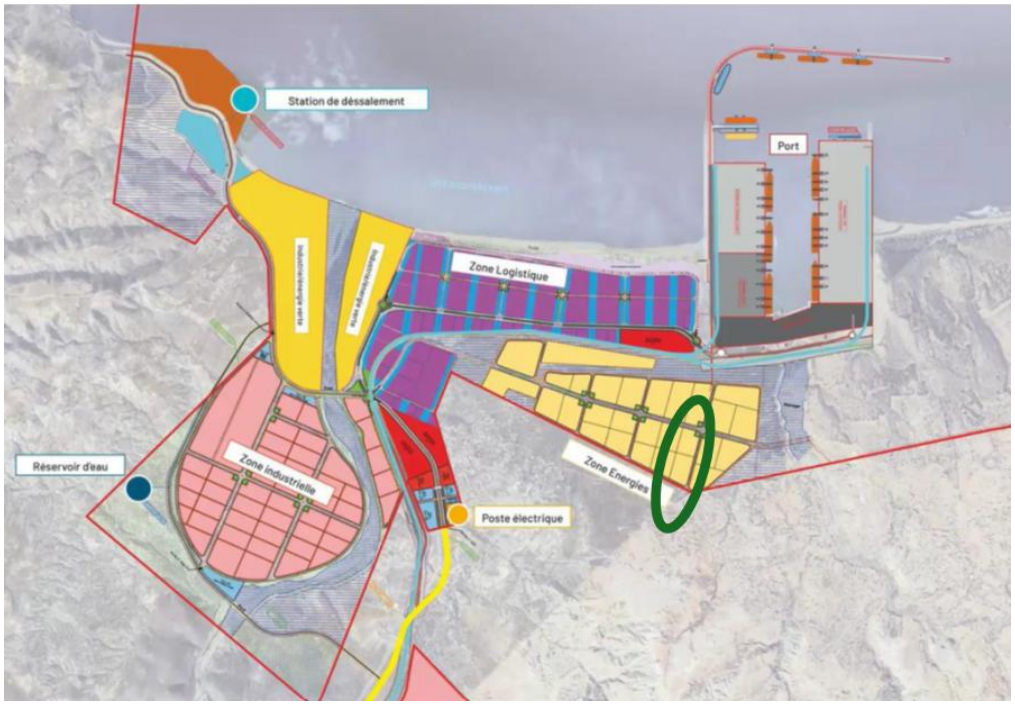


Figure 3-2 Project Location within the Wider NWM Complex



Figure 3-3 Project Locality and Boundaries

4. 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 was verified

through Project-specific social baseline surveys and stakeholder engagement, with consultations conducted in October 2026.

5. 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.

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 5-1 Satellite Imagery of the Project Area from 2023 and 2026

6. OVERVIEW OF THE PROJECT DESCRIPTION

The proposed facility will have an annual production capacity of approximately 176,000 tonnes of SAF, alongside renewable diesel, renewable naphtha and small quantities of bio-propane.

6.1 MAIN PROJECT ACTIVITIES

Construction: 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.

Commissioning: Commission phase 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 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.

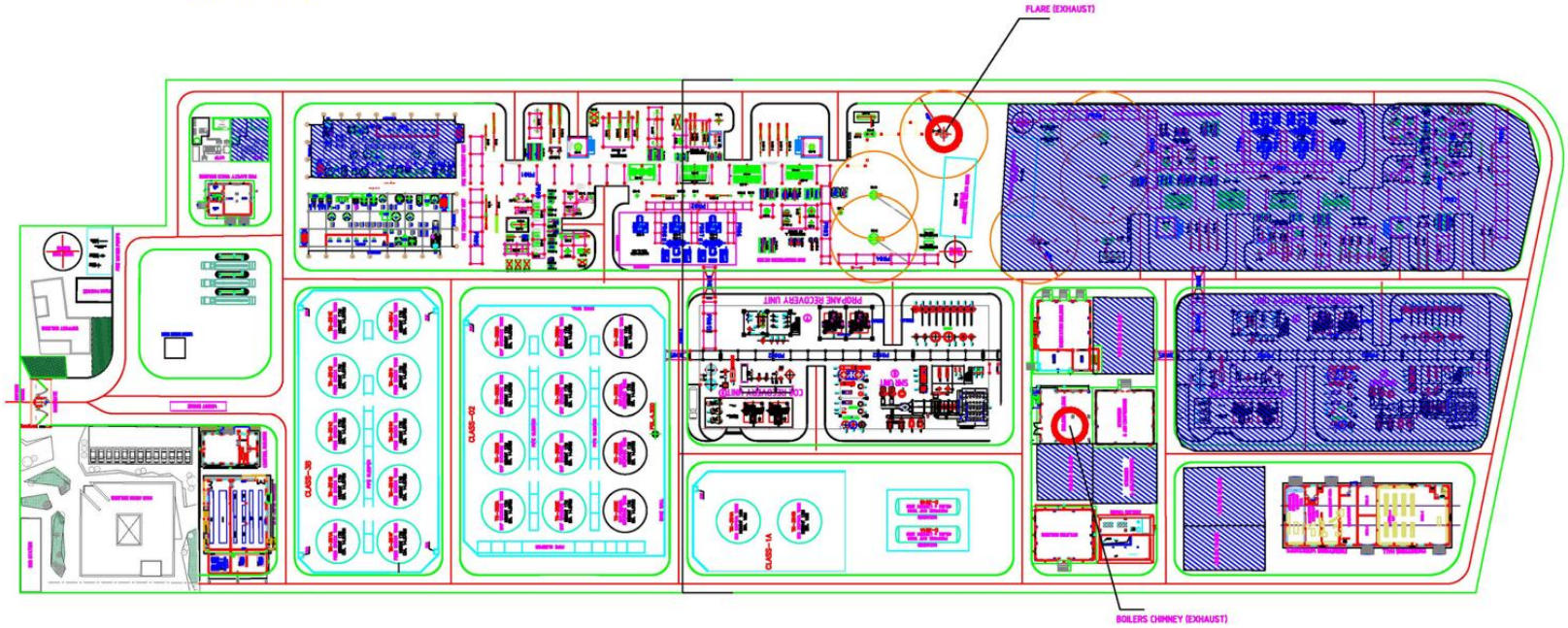
6.2 PRODUCTION PROCESS

The Project will use Axens' Vegan® technology based on the established Hydroprocessed Esters and Fatty Acids (HEFA) process and incorporates several measures consistent with Best Available Techniques (BAT) principles. The Project Layout and components are presented in the following Figure.

SAF PROJECT PLOT PLAN

Total area: 88000m2

Future:



0 10m 20 30 40 50m

SCALE OF METERS 1:750

NOTES :

1. ALL DIMENSIONS ARE SHOWN IN MILLIMETER, OTHERWISE NOTED.
2. DETAIL DIMENSION WILL BE DETERMINED DURING DETAILED ENGINEERING DESIGN.

REFERENCE DWG. NO.	TITLE	REV. NO.	DATE	DESCRIPTION	DRAWN	CHK.	ENG.	CCS/PS
		A	08-05-2026	ISSUED FOR REVIEW	YES	JSH	HAS	SSN
						CHECKED		EM
								PM/PD
								APPD.

EMPLOYER : GREEN SKY

PROJECT TITLE : RENEWABLE OILS & FATS HYDRO PROCESSING REFINERY IN MOROCCO

CONTRACTOR :

CONTRACTOR JOB NO.

CONTRACTOR DWG. NO: C236-L-PPL-001

SHEET: 1

EMPLOYER PROJECT NO.: GSC 002

SCALE: 1:750

DRAWING TITLE: OVERALL PLOT PLAN INDUSTRIAL PLANT, MOROCCO

REV. NO.: A

File Name : C236-[illegible]

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.

6.3 PROJECT TIMELINE

The Project is expected to be developed over approximately 22 months, from contract award in October 2026 to the start of operations in August 2028. Construction is scheduled to begin in November 2026 and continue until May 2028, followed by testing and commissioning activities between May and August 2028.

6.4 RESOURCE REQUIREMENTS AND WASTE MANAGEMENT

As shown in Figure 6-1 the Project will require workforce, raw materials, electricity, natural gas and water for its construction and operation. Measures will also be implemented to manage waste and wastewater and minimise potential impacts on the surrounding environment.



Figure 6-1 Resources And Waste Management Required

8.6 PROJECT ALTERNATIVES

The assessed alternatives are detailed in the following table.

No-Project Alternative	Not proceeding with the Project would avoid construction and operational impacts, including emissions, wastewater generation, resource consumption and traffic. However, it would also mean foregoing the benefits of renewable fuel production, potential greenhouse gas emission reductions, employment and investment. As the site is already designated for industrial development, it could also be used for another industrial activity with similar impacts. Therefore, the No-Project Alternative was not selected.
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. **The Preferred Location:** BILZ at Nador West Med was selected as the preferred location due to the availability of suitable industrial land, access to the deep-water port and supporting infrastructure.

Layout Alternatives	Two layouts were assessed, considering different arrangements of processing units, storage facilities, access roads and supporting infrastructure. **The preferred layout,** the project layout, provides greater separation between potentially hazardous activities and occupied areas, separates tanker unloading from the main processing facilities and improves emergency access.
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 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.

7. SUMMARY OF BAELINE, IMPACTS AND REQUIRED MITIGATION

Key environmental and social impacts were identified based on the nature of the development and the receiving environment, which were then assessed by the ESIA team or specialists. Impacts were assessed, using the impact assessment methodology below.

Interpretation of Significance		
Significance		**Decision Guideline**
Insignificant		Inconsequential, not requiring any consideration.
Very Low	**Very Low +**	These beneficial or adverse impacts will not influence the decision. In the case of adverse impacts, mitigation is not required.
Low	**Low +**	These beneficial or adverse impacts are unlikely to influence the decision. In the case of adverse impacts, limited mitigation is likely to be required.
Medium	**Medium +**	These beneficial or adverse impacts may be important but are not likely to be key decision-making factors. In the case of adverse impacts, mitigation will be required.
High	**High +**	These beneficial or adverse impacts are considered to be very important considerations and must influence the decision. In the case of adverse impacts, substantial mitigation will be required.
Very High	**Very High +**	Represents a key factor in decision-making. Adverse impact would be considered a potential fatal flaw unless mitigated to lower significance.

7.1 CLIMATE

Baseline: 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, annual precipitation is concentrated during the period spanning November – March, during which the average monthly precipitation ranges between 33.77 mm and 39.30 mm. The months spanning June-August are generally the hottest months, with average mean monthly temperatures ranging between 23.91°C and 27.44°C , while winter temperatures are considerably lower between the months of December and February ranging between 7.87°C and 9.47°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.

Impact Assessment: A Climate Risk and Vulnerability Assessment (CRVA) was undertaken in October 2026 to assess the Project's vulnerability to climate change and identify potential climate-related risks during construction and operation.

The assessment identified extreme heat, water scarcity, changes in rainfall patterns and flooding as the main climate-related risks to the Project. Increasing temperatures could affect worker health and safety, increase cooling requirements and reduce operational efficiency. Prolonged droughts could affect water availability and increase operating costs, while intense rainfall and flooding could damage infrastructure, disrupt transport and port activities, and affect Project operations.

The Project will also generate greenhouse gas (GHG) emissions from its industrial processes and energy consumption. Estimated annual direct and indirect energy-related emissions is 67,600 tonnes of carbon dioxide equivalent (tCO_2e) which exceed the 20,000 tCO_2e standard, although they represent a relatively small proportion of Morocco's projected national emissions.

Mitigation and adaptation measures will include appropriate stormwater drainage and flood protection, water efficiency and reuse, heat stress management for workers, and measures to improve operational resilience to extreme weather. Energy efficiency measures and GHG

emissions monitoring will also be implemented to manage the Project's contribution to climate change.

7.2 AMBIENT AIR QUALITY

Baseline: The Project is located within the developing NWM industrial Complex, where existing air pollution mainly comes from dust, vehicle movements and ongoing construction activities. Air quality monitoring was undertaken in September 2026 at two locations near surrounding communities. The results showed that air quality complied with Moroccan standards. However, levels of nitrogen dioxide (mainly associated with vehicle exhaust) and fine dust particles exceeded the more stringent World Health Organization (WHO) guidelines at both locations.

Impact Assessment and Mitigation:

Construction activities, including earthworks, excavation and vehicle movements, may temporarily increase dust and exhaust emissions, potentially affecting nearby residential properties, particularly in Imhiaten, approximately 230 m from the Project site. The impact is assessed as Medium before mitigation.

During construction, dust will be controlled through water spraying, vehicle speed restrictions, covering loose materials and regular maintenance of machinery. Dust-generating activities will be limited during strong winds, and any community complaints will be investigated and addressed. With these measures in place, the remaining impacts are expected to be temporary and localised, with a Low residual significance.

Operation of the SAF facility will generate air emissions from boilers, heaters and other processing equipment. The main pollutants include nitrogen dioxide (NO_2), sulphur dioxide (SO_2), carbon monoxide (CO), fine particles and benzene. An air quality modelling study was undertaken to predict how these emissions could affect nearby communities under normal and abnormal operating conditions. The results indicate that, during normal operation, the Project's predicted contribution to air pollution at nearby sensitive locations will remain below applicable Moroccan standards and international air quality guidelines. Under abnormal operating conditions, such as emergency flaring and operation of backup generators, a limited exceedance of the World Health Organization's guideline for nitrogen dioxide was predicted at one monitoring location (Figure 7-1). All other assessed locations remained within the applicable guidelines.

During operation, air emissions will be minimised through the use of natural gas-fired boilers fitted with low-emission burners, regular equipment maintenance and appropriate combustion controls. Routine flaring will be minimised, emergency generators will be used only when necessary, and storage and transfer systems will be maintained to prevent vapour leaks. Operational emissions, abnormal events and community complaints will be monitored and investigated. With these measures in place, the remaining impacts are expected to be of Low residual significance.

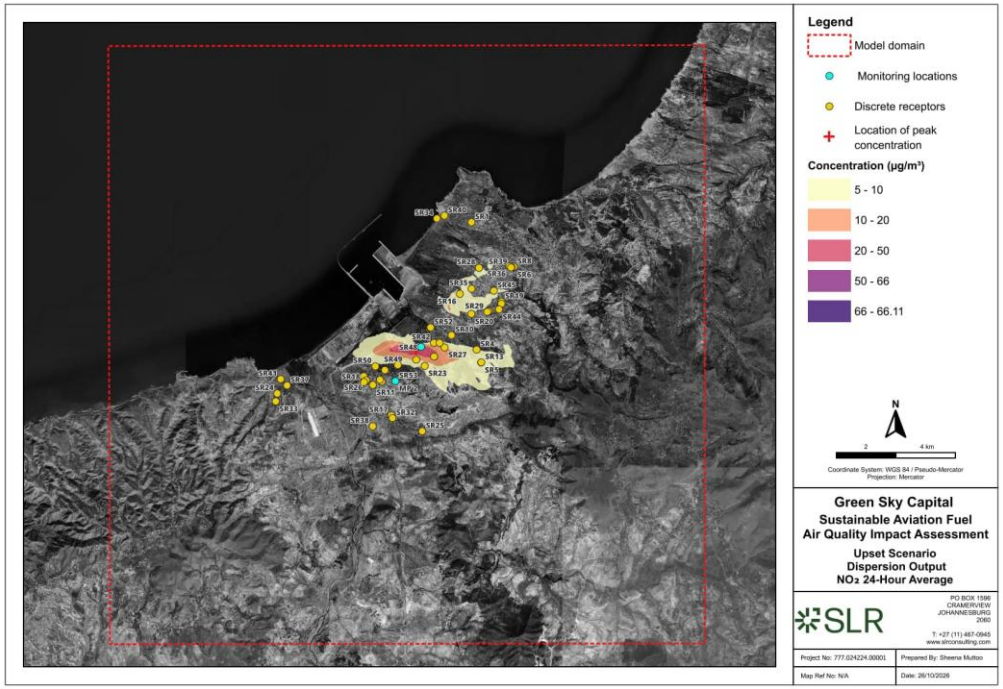


Figure 7-1: Upset conditions P99 24-hour average NO_2 (µg/m³)

7.3 AMBIENT NOISE

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

Impact Assessment and Mitigation:

Construction activities, including earthworks, installation of equipment and movement of heavy vehicles, will temporarily increase noise levels around the Project site. Nearby residential properties, may experience some disturbance. During construction, noise will be controlled through the use of well-maintained equipment, appropriate positioning of noisy machinery away from residential areas, and limiting particularly noisy activities to daytime hours where practicable. Noise barriers and monitoring will be considered where necessary, and community complaints will be investigated and addressed. With these measures, construction noise impacts are expected to be of Very Low residual significance.

Operation noise will be generated by equipment, compressors, pumps, cooling systems and other machinery operating continuously day and night. Noise modelling indicates that predicted noise levels at nearby residences will comply with applicable IFC/WBG noise limits as shown in Figure 7-2 and Figure 7-3. However, the increase compared to existing background noise is expected to be high, particularly at night when the surrounding environment is quieter. The impact is therefore assessed as High before mitigation, despite compliance with the applicable noise limits. Mitigation measures during operation will include the use of low-noise equipment, acoustic enclosures and silencers where necessary, regular equipment maintenance and operational noise monitoring. With these measures, the residual impact significance is expected to reduce to Medium.

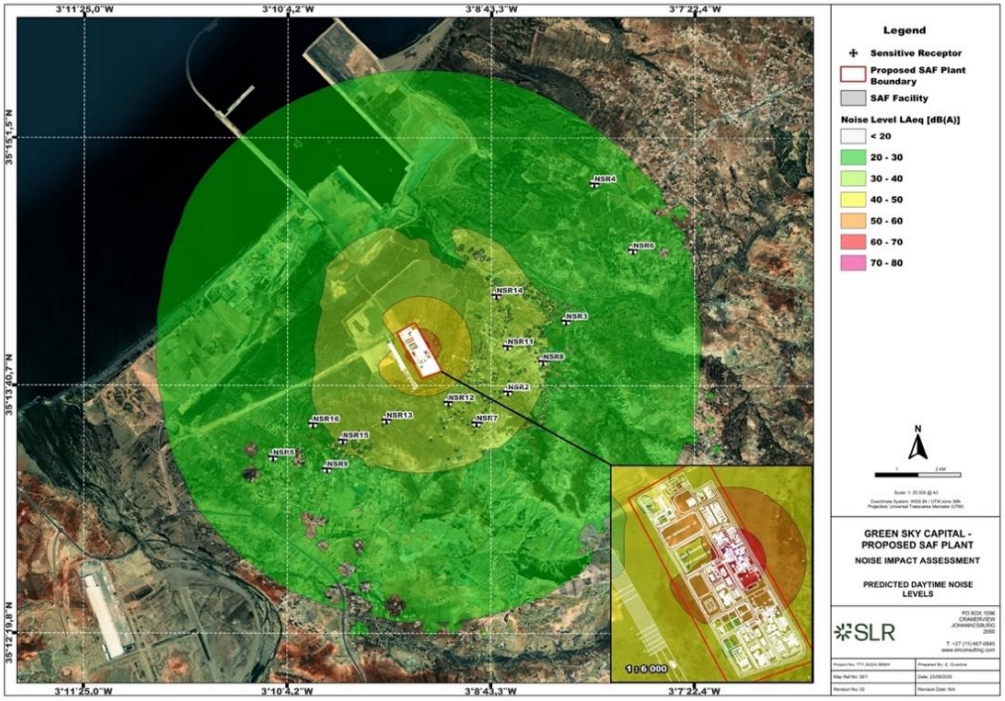


Figure 7-2 Daytime Noise Levels from the SAF Manufacturing Facility

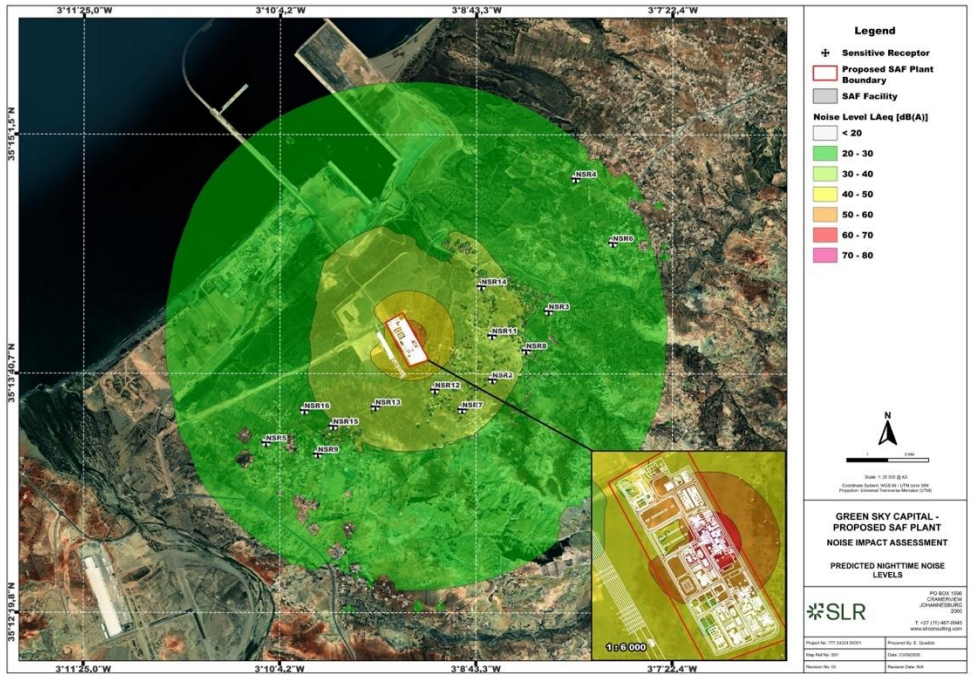


Figure 7-3 Nighttime Noise Levels from the SAF Manufacturing Facility

7.4 SOIL AND GROUNDWATER

Baseline: 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. Soil samples were collected from five locations across the Project site in September 2026 to assess existing soil quality and identify potential contamination. The results showed that all tested contaminants were below the adopted international screening values, with no evidence of significant soil contamination.

Groundwater quality was assessed through sampling of a well in the wider Project area in September 2026. Most tested parameters were within Moroccan drinking water standards, with no bacterial contamination detected. However, electrical conductivity was significantly elevated, indicating highly mineralised groundwater. Additional parameters, including BOD_5, COD and total suspended solids (TSS), were analysed, but could not be assessed against the selected Moroccan standard as no reference limits are specified for these parameters. The Project will not use groundwater for its water supply.

Impact Assessment and Mitigation:

Construction activities may result in accidental spills or leaks of fuels, oils, chemicals and wastewater, potentially contaminating soil and groundwater. Although most spills are expected to be small and localised, larger uncontrolled releases could require remediation. The impact is assessed as Low before mitigation. Construction measures will include storing fuels and chemicals in designated areas with appropriate containment, undertaking refuelling and maintenance on impermeable surfaces, regularly inspecting equipment for leaks, and ensuring proper waste and wastewater management. Spill response equipment will be available, and any spills will be promptly contained and cleaned up. Any water removed from excavations will also be appropriately managed to prevent contamination. With these measures, the residual impact significance is assessed as Insignificant.

Operation accidental spills or leaks of feedstocks, fuels, chemicals and finished products from storage tanks, processing equipment and loading areas could contaminate soil and groundwater. Although significant contamination is not expected during normal operations, uncontrolled releases could result in longer-term impacts. The impact is assessed as Medium before mitigation.

During Operation, the facility will incorporate closed processing systems, storage tanks with secondary containment, impermeable loading and unloading areas, and systems to prevent tank overfilling. Regular inspections and maintenance, appropriate hazardous-material and waste management, and spill prevention and response procedures will minimise contamination risks. Any spills will be promptly contained and cleaned up, with contaminated areas investigated and remediated where necessary. With these measures, the residual impact significance is assessed as Insignificant.

7.5 SURFACE WATER AND HYDROLOGY

Baseline: 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.

Impact Assessment and Mitigation:

Construction activities may result in sediment, fuels, oils and other contaminants being carried by rainwater runoff into surrounding drainage systems. However, there are no natural watercourses within the Project site, and impacts are expected to be temporary and localised. The impact is assessed as Low before mitigation. Mitigation will include appropriate site drainage, erosion and sediment controls, safe storage of hazardous materials, proper wastewater management and prompt clean-up of spills. With these measures, the residual impact significance is assessed as Insignificant.

During operation, accidental spills or contaminated rainwater runoff from processing, storage and loading areas could enter the wider drainage network and potentially affect surface water quality. The Project will not discharge directly into natural watercourses or the sea. The impact is assessed as Medium before mitigation. Mitigation will include separating clean and potentially contaminated stormwater, providing impermeable surfaces and containment around storage and processing areas, treating contaminated runoff through oil-water separators, and installing drainage isolation systems to prevent accidental releases. With these measures, the residual impact significance is assessed as Insignificant.

The development of buildings, roads and paved areas will reduce natural rainwater infiltration and could increase stormwater runoff by approximately three times compared with existing conditions. During heavy rainfall, this could cause localised flooding or overloading of drainage systems. The impact is assessed as Medium before mitigation.

The Project will incorporate a dedicated stormwater drainage system connected to the wider BILZ network, designed to accommodate heavy rainfall and account for future climate change. Drainage infrastructure will be regularly inspected and maintained, and critical equipment will be protected from flooding. With these measures, the residual impact significance is assessed as Low.

7.6 WASTE AND WASTEWATER

Construction activities will generate hazardous and non-hazardous waste, including construction debris, packaging, used oils and chemical residues, as well as wastewater from sanitary facilities, equipment cleaning and testing. Improper management could result in environmental contamination and increased demand on waste disposal facilities.

Waste impacts are assessed as Medium before mitigation, while wastewater impacts are assessed as Low. Measures will include waste segregation, reuse and recycling where practicable, secure storage, collection by authorised contractors, and appropriate wastewater collection and disposal. Untreated wastewater will not be discharged into the environment. With these measures, residual impacts are assessed as Low for waste and Insignificant for wastewater.

During operation, the facility will generate hazardous and non-hazardous waste, including spent catalysts, waste oils, treatment sludge, packaging and general waste. Approximately 612 m^3/day of wastewater will also be generated, of which around 304 m^3/day will be treated and reused within the facility, while approximately 306 m^3/day will be treated before discharge to the BILZ wastewater system.

Waste impacts are assessed as Medium before mitigation, while wastewater impacts are assessed as High due to the potential consequences of untreated discharges. Mitigation will include waste minimisation, segregation, recycling and disposal through authorised facilities, alongside dedicated wastewater treatment systems, regular monitoring and maintenance to ensure compliance with applicable discharge requirements. No untreated wastewater will be discharged into the environment.

With these measures, residual impacts from both waste and wastewater management are assessed as Low.

7.7 ARCHAEOLOGY AND CULTURAL HERITAGE

No archaeological remains or cultural heritage sites were identified within the Project site during the archaeological survey. However, there remains a small possibility of discovering previously unknown archaeological remains during construction excavations. A Chance Find Procedure will be implemented and construction workers will receive appropriate awareness training. With these measures, the residual impact significance is assessed as Insignificant. No impacts are anticipated during operation.

7.8 LANDSCAPE AND VISUAL AMENITIES

During construction, cranes, machinery, temporary facilities and lighting will temporarily change the appearance of the Project site. During operation, storage tanks, processing equipment, buildings and lighting will introduce permanent visual changes. However, the Project is located within a designated industrial area, where such infrastructure is consistent with the planned surrounding development.

Visual impacts during construction are assessed as Low before mitigation, reducing to Insignificant through good site housekeeping, appropriate material storage, removal of temporary facilities and controls on construction lighting. During operation, measures will include appropriate building finishes, maintaining an orderly site and directing external lighting to minimise glare and light spill. Operational visual impacts are assessed as Low both before and after mitigation.

During operation, storage tanks, processing equipment, buildings, stacks and external lighting will permanently change the appearance of the Project site. However, as the Project is located within a designated industrial area, these changes will be consistent with the planned surrounding development. The impact is assessed as Low before mitigation.

Mitigation measures will include appropriate building finishes, maintaining an orderly site and ensuring external lighting is directed and shielded to minimise glare and light spill towards surrounding areas. The residual impact significance remains Low.

7.9 TRAFFIC AND TRANSPORTATION

The Project is accessible via National Road RN16 and Provincial Road RP6202. The main access route connects to RN16 approximately 2.5 km from the Project site, passing mainly through industrial and agricultural areas and avoiding nearby residential settlements. A separate 4 km route connects the Project to NWM Port, reducing the need for heavy vehicles to use public roads. Existing traffic includes passenger vehicles, commercial vehicles and trucks associated with NWM development, with further road and rail infrastructure improvements planned.

During construction, increased vehicle movements, including heavy trucks, equipment deliveries and workforce transport, may cause temporary traffic congestion, road deterioration and safety risks. Traffic is expected to peak at approximately 125 vehicle movements per day. During operation, traffic will be considerably lower, with approximately 27 vehicle movements per day, mainly associated with deliveries, product transport and staff.

Traffic impacts are assessed as Medium before mitigation during both construction and operation. Measures will include designated transport routes, coordinated delivery schedules, workforce buses, speed restrictions, vehicle maintenance and road safety controls. Heavy deliveries will primarily use the designated access routes, avoiding residential areas where practicable.

With these measures, residual traffic impacts are assessed as Low during both construction and operation.

7.10 BIOLOGICAL ENVIRONMENT

Baseline: The Project site has already been cleared and prepared for industrial development and contains no natural vegetation or significant habitats for wildlife.

The wider area supports various mammals, birds and reptiles, including some species of international conservation concern. However, these species have not been confirmed within the Project site, which provides limited opportunities for feeding, breeding or shelter.

Several protected and internationally recognised biodiversity areas occur in the wider region, including the Alborán Sea, Jbel Gourougou, Trois Fourches and Sebkha Bou Areg. None overlap the Project site, and no direct impacts on these areas are anticipated.

Overall, the Project site is considered highly modified habitat, with limited biodiversity value and ecosystem services. No Critical Habitat has been identified within the Project footprint.

The site conditions are shown on the following photographs taken on site.



Figure 7-4 Site conditions

Impact Assessment and Mitigation:

As the Project site has already been cleared for industrial development, no significant habitat loss is anticipated. However, construction activities may temporarily disturb nearby wildlife through noise, dust, vehicle movements and accidental pollution. There is also a risk of introducing invasive plant species. Impacts are assessed as Very Low to Low before mitigation.

Mitigation measures will include restricting construction activities to designated areas, controlling dust and runoff, preventing spills, limiting vehicle speeds, protecting wildlife encountered during works and preventing the introduction of invasive species. With these measures, residual impacts are assessed as Insignificant.

During operation, lighting, noise, traffic, waste generation and accidental spills could affect wildlife in surrounding areas. However, given the industrial setting and limited biodiversity value of the Project site, impacts are expected to be localised and are assessed as Very Low to Low before mitigation.

Measures will include controlling lighting and noise, managing waste to avoid attracting wildlife, preventing pollution and monitoring and removing invasive plant species. With these measures, residual impacts are assessed as Insignificant.

7.11 SOCIO-ECONOMIC ENVIRONEMENT

Baseline:The Project is located within Iaazzanene Commune in Nador Province, which had approximately 12,706 residents in 2024. The surrounding area is predominantly rural, although it is undergoing industrial development associated with NWM. Nearby communities include Semmar, Imhiaten and Tiffasour, with the closest residential properties located approximately 230 m from the Project boundary.

The local economy traditionally relies on agriculture, artisanal fishing, livestock farming, small businesses and income from family members living abroad. The wider NWM development has created additional employment opportunities but has also affected some traditional livelihoods through land acquisition, changes in fishing access and loss of natural resources. Drought and water scarcity remain important challenges.

Community consultations undertaken in October 2026 identified the following key findings:

- Infrastructure and services: Communities have access to electricity, drinking water and schools, but lack collective sewerage networks. Access to healthcare is limited, with concerns regarding shortages of medicines and medical equipment.
- Livelihoods: Agriculture, fishing and livestock farming remain important, alongside growing employment opportunities in construction, industry and services.
- Vulnerable groups: Low-income households, widows with dependent children, elderly people and persons with disabilities may face greater difficulties accessing employment, healthcare and other resources.
- Gender: Women contribute to agriculture and livestock farming while also undertaking most household responsibilities. Improvements in girls' access to education were reported.
- Community concerns: Water scarcity, reduced agricultural opportunities, changes in fishing access, limited healthcare services and the need for employment opportunities were among the main issues identified.

The Project site itself is previously cleared industrial land, with no residential occupation or existing livelihood activities. Therefore, no physical displacement or direct loss of agricultural land or livelihoods is anticipated from the Project.

Impact Assessment and Mitigation:

The social impact assessment considers potential effects on surrounding communities, workers, local businesses and the wider economy during construction and operation. As the Project is located on previously cleared industrial land within BILZ, no physical displacement, land acquisition or direct loss of existing livelihoods is anticipated.

Construction will require a peak workforce of approximately 400 workers over an estimated 19-month period. This will create employment and economic opportunities but may also introduce temporary pressures on surrounding communities and services.

- Labour influx and community interactions: Non-local workers will be accommodated in established urban centres rather than dedicated worker camps. Increased interactions could lead to social tensions, inappropriate behaviour or harassment, including gender-based violence and harassment (GBVH). Local recruitment, worker

codes of conduct, awareness training and confidential grievance mechanisms will reduce these risks.

- Water resources: Construction will require approximately 20 m³/day of water on average, increasing to 40 m³/day at peak. Given existing water scarcity, sourcing water from supplies used by communities could affect availability. Water will be obtained from approved suppliers with sufficient capacity, avoiding community wells. The residual rating remains provisional until supply arrangements are verified.
- Community infrastructure and healthcare: The construction workforce may temporarily increase demand for accommodation, local services and healthcare, which communities have identified as already limited. Local recruitment, suitable worker accommodation, on-site medical facilities and arrangements with healthcare providers will minimise additional pressure.
- Community health, safety and security: Construction activities, hazardous materials, emergencies and interactions with security personnel could pose risks to surrounding communities. Restricted site access, secure boundaries, emergency response procedures and appropriate security management will limit these risks.
- Employment and working conditions: Workers could face unfair recruitment, excessive working hours, delayed wages, discrimination, harassment or forced and child labour, particularly through subcontractors. Labour management procedures, fair employment conditions, contractor monitoring and confidential worker grievance mechanisms will be implemented.
- - Supply chain risks: Construction suppliers may present risks relating to child or forced labour, unsafe working conditions and other labour rights violations. Supplier screening, due diligence, contractual requirements and corrective actions will be applied.
- - Occupational health and safety: Construction workers may face risks from heavy machinery, lifting, working at height, electrical activities, hazardous substances and other construction hazards. These will be managed through risk assessments, safe working procedures, training, protective equipment, supervision and emergency preparedness.

Construction will also generate two positive impacts, both assessed as Medium positive:

- Temporary employment and skills development: Up to 400 construction jobs, with opportunities for local recruitment, training and skills development.
- Local procurement and economic benefits: Increased demand for construction materials, transport, accommodation, catering and other goods and services could benefit local businesses and households.

Operation will require approximately 162 workers and generate long-term employment and business opportunities. However, the handling of hazardous materials and continuous industrial operations will introduce risks requiring ongoing management.

- Labour influx and community interactions: Non-local workers may increase community interactions and create risks of social tensions or harassment. Local recruitment, worker conduct requirements and grievance mechanisms will help manage these risks.
- Community infrastructure and services: Workers may increase demand for accommodation and healthcare. The Project will use the NWM industrial water network rather than community water sources, with approximately 889 m³/day of external freshwater required after water reuse. On-site medical facilities and arrangements with healthcare providers will reduce pressure on local services.
- Community health, safety and security: The storage and processing of flammable, pressurised and potentially toxic materials could result in fires, explosions or hazardous releases extending beyond the Project boundary. The preliminary risk assessment identifies bio-propane storage and loading, hydrogen systems and hydrogen sulphide as key hazards. Safety systems, emergency preparedness and coordination with NWM and emergency services will reduce risks. However, the residual Low rating remains provisional until the detailed risk assessment confirms that off-site risks are acceptable.
- Employment and working conditions: Potential risks include excessive working hours, fatigue from shift work, discrimination, harassment and unfair employment practices. Labour management procedures, appropriate shift arrangements, contractor monitoring and worker grievance mechanisms will be implemented.
- Supply chain risks: The collection and supply of waste oils and other feedstocks may involve multiple suppliers and intermediaries, creating risks of poor working conditions, child or forced labour and unsafe practices. Supplier screening, traceability, audits and corrective actions will be implemented.
- Occupational health and safety: Workers may be exposed to hazardous chemicals, high-pressure systems, flammable materials, machinery, confined spaces and other industrial hazards, potentially resulting in serious injuries or fatalities. Process safety systems, engineering safeguards, safe working procedures, training and emergency response arrangements will be implemented.

Operation will also generate three positive impacts, each assessed as Medium positive:

- Long-term employment and skills development: Approximately 162 permanent operational positions, with opportunities for local employment, technical training and skills development.

- Local procurement and economic benefits: Ongoing demand for feedstocks, materials, maintenance, transport and other services will support businesses and suppliers in Morocco.
- Renewable fuels and green industrial development: The Project will contribute to Morocco's renewable fuels industry through new manufacturing capacity, industrial diversification, investment, technology transfer and potential export opportunities.

Overall, the Project is expected to provide positive employment and economic benefits during both phases. Most adverse social impacts are assessed as Low or Very Low following mitigation. The most important outstanding consideration is operational community safety, for which the final design and detailed risk assessment must demonstrate acceptable risks to surrounding communities and industries.

7.12 SUMMARY OF IMPACTS

Impacts prior to mitigation as assessed in the ESIA and the residual impacts following the implementation of the mitigation measures are summarised in the following table.

Impact	Project Phase	Impact Before Mitigation	Impacts After mitigation
Construction dust and air emissions	Construction	Medium	Low
Construction noise	Construction	Low	Very Low
Soil/groundwater contamination	Construction	Low	Insignificant
Surface water quality	Construction	Low	Insignificant
Waste generation and management	Construction	Medium	Low
Construction wastewater	Construction	Low	Insignificant
Cultural heritage chance finds	Construction	Low	Insignificant
Landscape and visual amenity	Construction	Low	Insignificant
Traffic and road safety	Construction	Medium	Low
Habitat loss and fauna disturbance	Construction	Very Low	Insignificant
Invasive alien species	Construction	Low	Insignificant
Dust, runoff and pollution on habitats	Construction	Very Low	Insignificant
Labour influx and GBVH	Construction	Medium	Low
Pressure on water resources	Construction	Low	Low
Pressure on community infrastructure and services	Construction	Low	Low
Pressure on Existing Healthcare Services	Construction	Low	Low
Community health, safety and security	Construction	Low	Low
Labour and working conditions	Construction	Low	Low
Supply chain risks	Construction	Low	Very Low
Occupational health and safety	Construction	Medium	Low
Employment and skills	Construction	Medium +	Medium +
Local procurement	Construction	Medium +	Medium +
Operational air quality	Operation	Medium	Low
Operational noise	Operation	High	Medium
Soil/groundwater contamination	Operation	Medium	Insignificant
Surface water quality	Operation	Medium	Insignificant
Stormwater runoff and pluvial flood risk	Operation	Medium	Low
Waste generation and management	Operation	Medium	Low
Operational wastewater	Operation	High	Low[1]
Landscape and visual amenity	Operation	Low	Low
Traffic and road safety	Operation	Medium	Low
Fauna disturbance from lighting/noise	Operation	Low	Insignificant
Invasive alien species	Operation	Low	Insignificant
Accidental spills and biodiversity	Operation	Very Low	Insignificant
Waste attraction of fauna	Operation	Very Low	Insignificant

[1] subject to design and compliance measures

Impact	Project Phase	Impact Before Mitigation	Impacts After mitigation
Labour influx and GBVH	Operation	Low	Low
Pressure on services	Operation	Low	Very Low
Community major accident risk	Operation	Medium	Low[2]
Labour and working conditions	Operation	Low	Low
Supply chain risks	Operation	Medium	Low
Occupational health and safety	Operation	High	Low
Employment and skills	Operation	Medium +	Medium +
Local procurement	Operation	Medium +	Medium +
Renewable fuels industry contribution	Operation	Medium +	Medium +

7.13 DECOMMISSIONING

The Project is expected to operate for approximately 30 years, after which the facilities may be decommissioned, refurbished or repurposed.

Decommissioning activities may involve dismantling and removing equipment, buildings and infrastructure, resulting in impacts similar to those during construction, including dust, noise, traffic and health and safety risks. Additional risks may arise from demolition waste, hazardous materials, residual chemicals and potential soil and groundwater contamination.

As the nature and extent of these impacts cannot be reliably determined at this stage, a detailed assessment will be undertaken closer to decommissioning. A Decommissioning Plan will be prepared in consultation with relevant authorities and will address waste management, pollution prevention, worker and community safety, stakeholder engagement, site remediation and restoration, and environmental monitoring.

7.14 CUMULATIVE IMPACTS

A qualitative cumulative impact assessment was undertaken for construction and operation, considering the combined effects of the Project, NWM Port, BILZ infrastructure, Goldensun Tire Morocco, Boway New Materials and other planned industrial, logistics and energy developments.

The main cumulative impacts of concern include increased air emissions and noise from neighbouring industrial facilities; traffic congestion and road safety risks; pressure on shared water, wastewater, stormwater and waste-management infrastructure; and increased demand for community services. The wider development will also result in permanent changes to the landscape and potential risks associated with major industrial accidents, including fires, explosions and hazardous releases affecting neighbouring facilities and communities. Conversely, cumulative employment and economic benefits are anticipated.

These impacts will be managed through Project-specific mitigation measures, coordinated infrastructure planning, environmental monitoring and collaboration between developers, NWM and relevant authorities. Particular attention will be required for cumulative industrial safety risks, infrastructure capacity and future air emissions, as further information becomes available on neighbouring developments.

8. STAKEHOLDER CONSULTATION AND DISCLOSURE

Stakeholder engagement for the Project builds on previous consultations undertaken for the wider NWM development. A standalone Stakeholder Engagement Plan (SEP) has been prepared in line with Moroccan requirements and EBRD standards to guide ongoing consultation, information disclosure and grievance management.

Project-specific consultations were undertaken on 15–16 October 2026 in Semmar, Imhiaten and Tiffasour, involving 18 community members (nine men and nine women), together with an interview with the Vice-President of Iaazzanane Communal Council.

The main findings included:

- Livelihoods: Agriculture, fishing and livestock farming remain important, with communities reporting challenges from drought, previous NWM land acquisition and changes to fishing access.
- Healthcare: Limited medical equipment, medicine shortages and the need to travel to Nador or Oujda for specialised treatment were major concerns.
- Water and sanitation: Water scarcity remains a concern, and communities lack collective sewerage networks.
- Vulnerable groups: Low-income households, widows, elderly people and persons with disabilities were identified as particularly vulnerable.
- Employment: Communities expressed strong interest in local employment opportunities and income diversification.

Overall, the concerns raised primarily related to existing socio-economic challenges and previous NWM development activities. No specific concerns regarding the proposed SAF

[2] provisional subject to detailed QRA

Project were documented. Ongoing engagement, information disclosure and accessible grievance mechanisms will be maintained throughout the Project's construction and operation phases.

8.1 GRIEVANCE MECHANISM

The Project will establish a grievance mechanism to allow surrounding communities and other stakeholders to raise concerns or complaints regarding its environmental and social performance throughout construction and operation. The mechanism will be free of charge, accessible, confidential and available for anonymous submissions, without fear of retaliation. The Social Development Officer (SDO), under the oversight of the GSC ESG Manager, will be responsible for receiving, recording, investigating and following up on grievances. Complaints may be submitted in Arabic, French or Tarifit (Amazigh), with assistance available for individuals facing language, literacy or other barriers.

Grievances will generally be addressed within 10 working days for straightforward cases and 15 working days for cases requiring further investigation. Complainants dissatisfied with the outcome may request a review or seek resolution through the relevant authorities.

Special confidential procedures will apply to sensitive complaints, including gender-based violence and harassment. Separate grievance mechanisms will also be available for Project workers, including contractor personnel. The Project's grievance contact details are provided below.

Table 8-1: Project Grievance Contact Details

Channel	Details
Contact person	Tarik Bouattioui
Telephone	+212 6000097402
Email	Tarik.bouattioui@saffly.com

The grievance mechanism will be communicated to surrounding communities through Project information materials and stakeholder engagement activities. All grievances and corrective actions will be documented and monitored to ensure timely resolution and continuous improvement.

Affected stakeholders may also raise concerns through EBRD's Independent Project Accountability Mechanism (IPAM) or seek judicial and administrative remedies. The EBRD IPAM is accessible via the following link: https://www.ebrd.com/home/what-we-do/projects/independent-project-accountability-mechanism.html

9. CONCLUSION

This ESIA has evaluated the potential environmental and social impacts associated with the construction, operation and cumulative impacts of the Project.

The assessment has identified potential impacts relating to air quality, noise, soil and water resources, waste and wastewater management, biodiversity, traffic, occupational and community health and safety, and socio-economic conditions. The Project is also expected to generate positive socio-economic benefits through employment, local procurement, skills development and contributions to Morocco's renewable fuels industry and green industrial development.

The findings indicate that most identified adverse impacts can be reduced to Low or Insignificant significance through the implementation of the proposed mitigation and management measures. However, particular attention will be required for operational process safety, hazardous materials management, emissions control, wastewater management and potential cumulative impacts associated with the wider development of NWM/BILZ.

The ESMP establishes the measures, responsibilities, monitoring requirements and performance indicators necessary to manage these impacts throughout the Project lifecycle. Its effective implementation, supported by the Project ESMS, contractor oversight and ongoing stakeholder engagement, will be essential to maintaining environmental and social performance.

Overall, the Project is considered capable of being developed and operated in an environmentally and socially acceptable manner, subject to implementation of the proposed mitigation measures, verification of outstanding design and safety requirements, and compliance with applicable Moroccan legislation and relevant lender environmental and social standards.