

NON-TECHNICAL SUMMARY

ENVIRONMENTAL & SOCIAL IMPACT ASSESSMENT

SAMTA METALS RECYCLING PROJECT

KENITRA, MOROCCO

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ACRONYMS AND ABBREVIATIONS

Acronyms	Description
AFZ	Atlantic Free Zone
Al	Aluminum
Cu	Copper
EBRD	European Bank for Reconstruction and Development
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
PPE	Personal Protective Equipment
SEP	Stakeholder Engagement Plan
STEP	Sewage Treatment Plant

1. PROJECT DESCRIPTION

Samta Metals & Alloys SA, Morocco (Samta) propose to construct and operate a copper (Cu) and aluminum (Al) scrap recycling complex in the Atlantic Free Zone (AFZ) near Kenitra in Morocco (see Figure 1). The complex will process industrial and sourced scrap to produce Al ingot and Cu cathode / rolled rod specifically for the automotive industry. Core to the Project rationale is the energy savings and lower carbon emissions of secondary source (i.e. recycled) Cu and Al, compared to primary resource derived metals, as well as the Project location within an existing automotive industrial area that can provide both scrap inputs and product offtake. The Project is currently at the start of the Engineering and Procurement phase, with the property having been purchased, and detailed design and construction contractors being identified. Samta aims to start construction by April 2024 and achieve commercial production in February 2025.

1.1 PROJECT PHASES

Construction activities will involve earthworks, civil construction and installation of processing equipment and structures. Commissioning will comprise cold and hot commissioning tests, as well as a trial production run linked to the plant performance guarantee.

The aluminum alloy production workshop includes several components:

- Temporary storage area for raw materials;
- Crushing and sorting area;
- Aluminum slag processing area;
- Melting and casting area;
- Temporary storage area for aluminum ingots;
- Storage area for hazardous waste;
- Control room and electrical distribution area;
- Machine repair room; and
- Material warehouse.

The copper cathode production workshop comprises several components:

- Melting area;
- Pyrometallurgical refining area;
- Electrolytic refining area; and
- Electrolysis purification area.

Operations will involve the sourcing and processing of Al and Cu scrap materials to produce approximately 15,000 tonnes/annum of copper cathode / rod, and approximately 20,000 tonnes/annum of aluminum alloy ingot. The core process flows are outlined in Figure 2.

1.2 ASSOCIATED INFRASTRUCTURE

The management of the AFZ industrial zone in Kénitra is governed by a charter of specifications which includes contractual clauses to regulate the intervention of different actors through common rules, ensuring well-managed industrial infrastructure. The AFZ is fully equipped with basic infrastructure including road networks, sanitation, drinking water supply, electricity, public lighting, and telecommunications.

Atlantic Free Zone Location

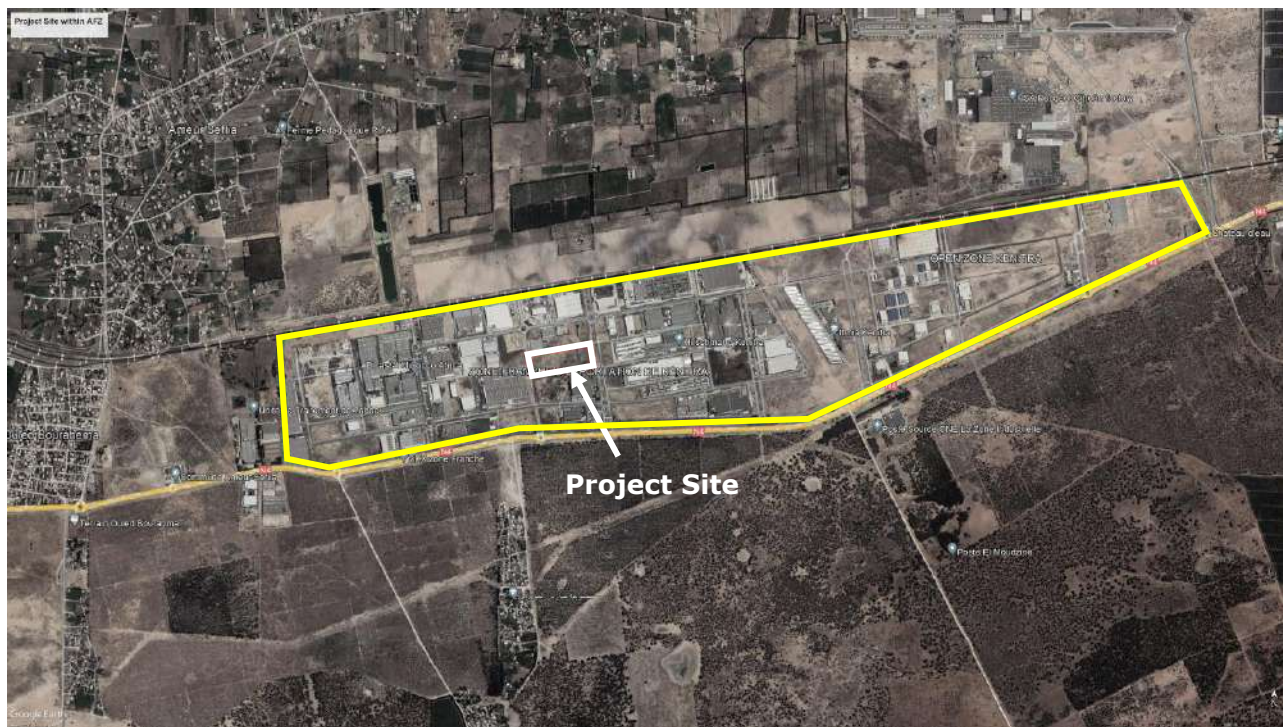
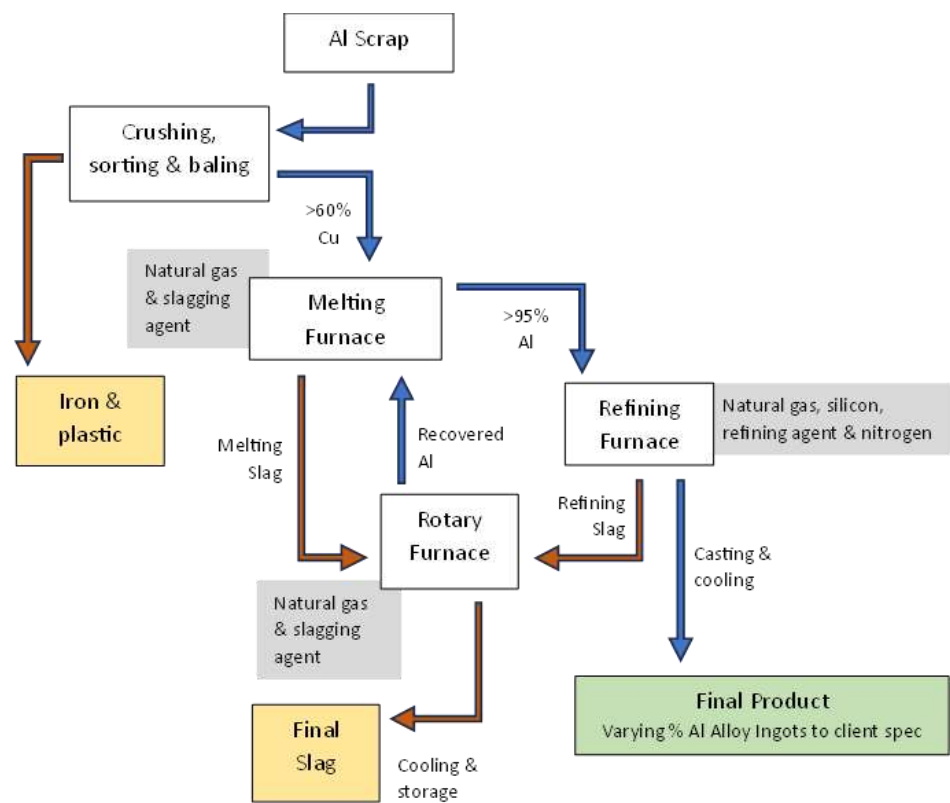
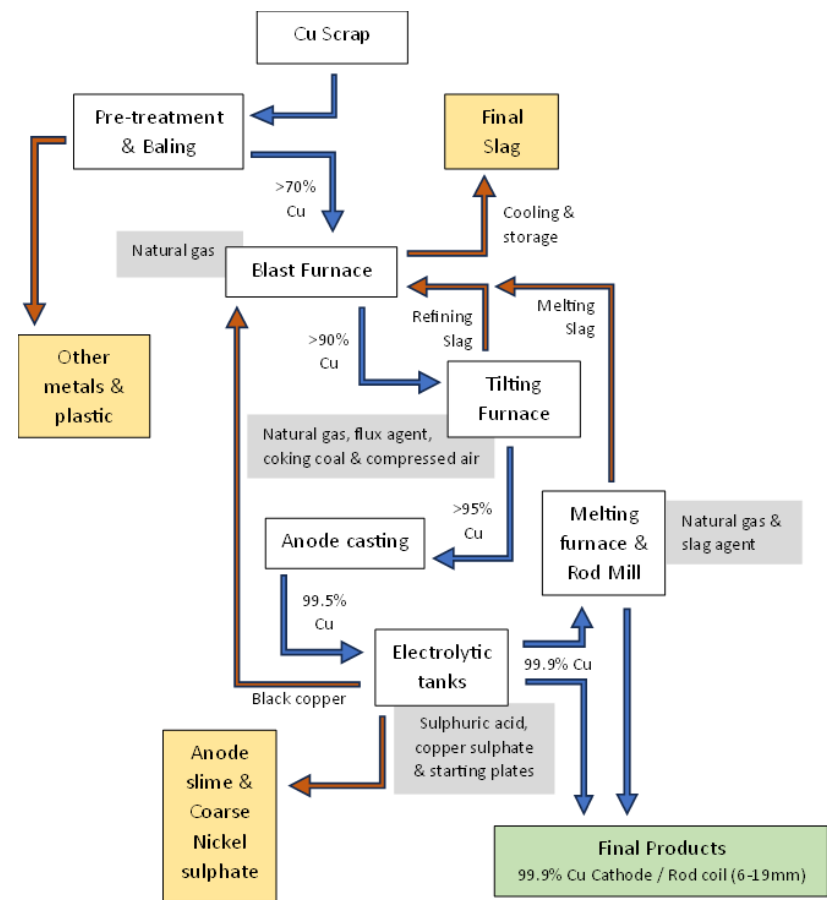


FIGURE 2 PROJECT LOCATION



ALUMINUM PROCESSING



COPPER PROCESSING

2. BACKGROUND

2.1 RATIONALE OF THE PROJECT

The Project is the subject of a broader investment dialogue between the Samta Group and the Industry Ministry of Morocco. The following points justify the project:

- Value creation within Morocco to allow the country to become more self-reliant on the production of metals required by the domestic automotive and aeronautical industries;
- To develop an eco-system to attract downstream industries for metal processing;
- To facilitate a circular economy through the recycling of scrap metal;
- Additional revenue for the local government;
- Local skill development in metallurgical industries;
- Job creation in recycling and manufacturing;
- Conservation of natural resources including energy and water;
- Preservation of wildlife and ecosystems through reduced mining activities; and
- Carbon footprint reduction of individuals, businesses, and communities.

2.2 LEGAL ASPECTS

During the implementation of the Project, Samta are expected to meet the requirements set out by relevant Moroccan regulatory bodies and funders, including the European Bank for Reconstruction and Development (EBRD), environmental, social, health and safety legislation and standards. Adhering to such standards is a requisite for realizing industrial projects in Morocco, which must be in line with sustainable development principles.

Compliance with National Requirements

The Moroccan legislative framework is characterized by a significant number of laws based on the protection of private property, state heritage, public health, and the maintenance of the quality of borrowed goods. The laws and regulations in force aim to protect the environment and public health by strictly regulating the emissions of gases, liquids, and solid discharges from industrial activities.

The national requirements for environmental assessment have been met through the development of the ESIA. Public consultations, as required by national legislation, were also conducted in 2023.

Compliance with AFZ Requirements

As the Project is subject to the AFZ's internal urban planning requirements. In particular, Samta must provide the necessary measures to avoid any risk of infiltration and soil contamination by polluting materials; industrial effluents must be pre-treated prior to discharge into the AFZ sewer network; and each manufacturer must set up its own pre-treatment system for its discharges in order to meet admissible thresholds for discharge into the municipal network.

Compliance with EBRD Requirements

The European Bank for Reconstruction and Development (EBRD) is considering providing finance to Samta for the development of the Project. In this regard, an Environmental and Social Action Plan (ESAP) has been developed to facilitate Project compliance with the standards applicable to EBRD's financing of the Project.

2.3 ENVIRONMENTAL AND SOCIAL BASELINE

The study area is located in the Northwest region of Morocco, in what is considered a privileged geographical location with considerable water and soil resources.

Climate: The climate of the project area is Mediterranean, with mild and humid winters and hot and dry summers. The Project area is strongly influenced by the oceanic climate. The average annual rainfall is approximately 557 mm/year. The average temperatures range between 12.1°C and 24°C with the months of July and August being the hottest.

Geological characteristics: The Project area is located at the northern limit of the Maâmora glacia, which lies between the ancient, tabular Meseta massif to the south and the subsident Gharb plain to the north. The Maâmora area is characterized by predominantly sandy soils. The soil is formed by a highly permeable sandy horizon of variable thickness which overlies a less permeable clay-sandy layer.

Hydrology: The study area lies within the lower watershed of the Oued Sebou. The Sebou hydraulic basin contains almost a third of the country's surface water.

Hydrogeology: Groundwater is an important resource in the study area and represents reserves accumulated over a long period of time, replenished by the infiltration of rainwater. Groundwater (boreholes and spring catchments) is the main source of drinking water and industrial water supply for the main towns in the Kénitra region.

Noise level: The Project will be located in an industrial zone situated within a rural area with low population density, currently characterized by a low noise level. However, in general, the background noise level is expected to increase due to the construction of new industrial units planned in the AFZ platform.

Flora and fauna and biodiversity: The Project area is located at the northern limit of the Maâmora plateau, an area holding significant biological and ecological importance. However, the Project will be established within the AFZ industrial zone which lacks any significant vegetative cover of interest.

Protected areas: Located 4.5km from the AFZ industrial area is the Merja Bouka, classified as a continental wetland of priority 3 by the Protected Areas Master Plan (1995). Historically this was a permanent wetland until at least 1980, but it is now temporary, being inundated for 6 to 8 months per year. There are no other protected areas within a 5km radius of the site.

Infrastructure: The geographical location of the Project on the axis connecting Casablanca to Tangier places the project on a crossroads from the North to the South, as well as on the transportation route from Kénitra port, inland. As a result, the region benefits from a well-developed communication infrastructure including roads, highways and railways.

Economic activity and employment: The labour force participation rate in the Kenitra province for the population aged 15 and above is 50.2% explained by the predominance of agricultural activities. The unemployment rate sits at approximately 14.4%. The industrial sector plays a vital role in the region given its positive impact on value production and job creation. This has facilitated the development of various industrial activities including the agro-food sector, petrochemicals, metallurgy, and more.

3. PROCESS

3.1 ESIA

The ESIA is an essential tool for assessing the potential environmental and social effects of the project and proposing the appropriate mitigation measures. The implementation of these measures contributes to minimizing the negative impacts of the project and to improving its environmental and social performance.

The identification and evaluation of the Project's impacts were derived from analysis to determine the potential disturbances to various elements of the natural and human environment resulting from different phases of the project. Two main types of impacts were identified during the ESIA:

- Socio-economic impacts: The effects of the project on the local economy, lifestyles, and migration of people.
- Environmental impacts: These impacts can include changes in air quality, freshwater, and soil, among others.

These impacts are analyzed in relation to existing standards and established tolerance thresholds and then prioritized according to their relative importance to establish an order of priority for mitigation or compensation measures.

3.2 PUBLIC CONSULTATIONS

National legislation requires a public inquiry to take place regarding environmental impact assessments. Public consultation must take place during the preliminary examination of the Project, during and after the completion of the impact assessment, as well as during the implementation of the Project.

The public inquiry, as stipulated by the regulatory procedure concerning the environmental impact assessment of the Samta metal residue recycling plant project, took place from 5 September to 25 September 2023, in the municipality of Ameer Seflia, located in the province of Kénitra. This comprised of advertising of the Project in two newspapers as stipulated by the ESIA regulatory procedures. The conclusion of the inquiry indicated that no objections or comments were raised during this public inquiry by concerned parties.

3.3 STAKEHOLDER ENGAGEMENT PLAN

A Stakeholder Engagement Plan (SEP) has been developed for the Project in accordance with EBRD's Environmental and Social Policy (2019). Implementation of the SEP will ensure that all stakeholders are identified, that sufficient information about issues and impacts arising from the Project are disclosed, and that stakeholders are engaged in a meaningful and culturally appropriate manner throughout Project implementation.

4. ENVIRONMENTAL IMPACTS AND OPPORTUNITIES

During the construction phase of the Project, the main negative environmental impacts are associated with air quality from the emissions of gaseous pollutants and dust, as well as potentially water and soil pollutants resulting from potential chemical spills. During the operational phase, the most significant environmental impacts are likely to also be associated with water quality and the quality of effluent discharged to the AFZ network in addition to

negative impacts on air quality associated with gaseous emissions of dust and gaseous pollutants.

The ESIA concludes that if the mitigation measures identified by the ESIA are implemented, the overall significance of residual and cumulative impacts will be minor or negligible.

4.1 AIR QUALITY

Impacts on air quality during the construction phase are likely to occur from the emitting of gaseous pollutants and dust into the air due to the operation and movement of construction machinery and transport trucks. These anticipated impacts on air quality are localized and occur over short periods. Furthermore, due to the absence of a population in the immediate vicinity of the site, the impact will be temporary, reversible, and of low significance.

During the operational phase, the activities involved in copper metal and aluminum alloy production will generate dust, including a significant proportion of metallic particles, and emissions of gaseous pollutants. These substances can negatively affect ambient air quality. Activated carbon adsorption and alkaline solution spraying systems have been selected to reduce emissions of dioxins, hydrochloric acid, and sulfur dioxide. Furthermore, due to the planned flue gas purification processes, the Project's emissions will be in accordance with current Moroccan regulations, ensuring the protection of the environment and public health for neighboring human settlements.

4.2 BIODIVERSITY AND NATURE CONSERVATION

The impact on fauna and flora is considered to be negligible or very low, as the Project is located within the AFZ industrial zone which lacks any significant vegetative cover of interest. As the AFZ site is already open, it is likely that any animal species will have likely already moved away due to the initial modifications made in constructing the AFZ.

4.3 CONSISTENCY WITH POLICY, LAW AND OTHER PLANS

Compliance with environmental standards and emissions limits has become a prerequisite for obtaining the necessary authorizations and permits for industrial projects. Samta will implement an environmental surveillance plan as well as an environmental monitoring program to ensure that the Project complies with environmental regulations and that recommendations outlined in the impact assessment are implemented. This includes the monitoring of earthworks, safety conditions, waste management, air quality noise, and water quality discharge.

4.4 CUMULATIVE IMPACTS

Noise level: The Project is located in an industrial zone situated within a rural area with low population density, currently characterized by a low noise level. However, the background noise level in the area is expected to increase due to the construction of new industrial Projects planned in the AFZ industrial zone. The noise level is also expected to become more significant due to increased vehicular traffic from construction vehicles, personnel transportation, and goods transportation. The Project will implement an embankment to screen the source of noise wherever required, adopting best practice technology as per BAT-18.

Air emissions: Construction activities are likely to have impacts in terms of emitting gaseous pollutants and dust into the air. The extent of these impacts depends on the distances traveled, the speed of the machinery, and the characteristics and moisture content of the roads and

soils. The anticipated impacts on air quality are minor, localized and occur over short periods resulting from the operation and movement of construction machinery and transport trucks.

Road traffic: The traffic associated with the commissioning of the project will add to that of other industrial units in the AFZ, resulting in a cumulative impact on road traffic. These activities will lead to increased traffic on the RN4, which may lead to an elevated risk of congestion-related accidents in the absence of appropriate mitigation measures.

4.5 LAND USE PLANNING AND CHANGES

The area in which the Project is located has already undergone significant land use changes for the development of the AFZ industrial platform. Therefore, any land use changes are confined to the AFZ.

4.6 LANDSCAPE AND VISUAL IMPACTS

There will be slight modifications to the local landscape due to the presence of material and waste stocks. However, the AFZ area that will host the project has previously undergone significant modifications for the development of the AFZ industrial platform. Therefore, the visual impact of the project will mainly be confined to the AFZ industrial zone. Additionally, the specifications of the AFZ require architectural criteria that contributes to reducing the visual impact of projected buildings and enhancing their landscape integration. Therefore, the impact on surrounding landscape is considered to be low.

4.7 RAW MATERIAL SOURCING AND TRANSPORTATION, INCLUDING BORROW PITS

The bulk of Cu and Al raw scrap will be sourced from industrial processing facilities and scrap dealers in the region. Raw materials will be trucked to the complex.

Prior to commencing the works, it will be necessary to develop a detailed earthwork plan, specifying the quantities of materials to be reused as fill, those to be removed, and any borrowings. Temporary deposits, in particular, should be placed in a manner that does not disrupt the water flow. The deposit of excavated topsoil should also be monitored. Lastly, it is important to plan for the restoration of any borrowing sites.

4.8 ROAD SAFETY

The construction site will lead to some disturbances in road traffic due to transportation operations related to the supply of construction materials and equipment. To mitigate any road safety risks, it is recommended to follow precautionary instructions and to install highly visible signs indicating exit points. Furthermore, the transportation of materials and movement of heavy equipment will be conducted outside peak hours to avoid disrupting road traffic.

4.9 TRAFFIC, NOISE AND VIBRATION

The project will be located in the AFZ industrial zone, situated within a rural area with a low population density, currently characterized by a low noise level. However, the background noise level in the area is expected to increase due to the construction projects of new industrial units planned within the AFZ platform.

During the construction phase of the Project, there will be temporary nuisances related to increased levels of noise emissions originating from construction machinery and trucks and

trailers transporting materials and equipment. However, as the site is a sufficient distance away from nearby residences, the impact is considered to be low.

During the operational phase, machinery in the production lines, engines, and pumps are generally sources of noise emissions. However sound insulation measures will be implemented in accordance with the regulations recommended by AFZ's specifications. This includes implementation of an embankment to screen the source of noise wherever required. Ultimately, the impact of noise will only be felt within the project site and should not extend to neighboring establishments.

4.10 WASTE MANAGEMENT

A waste management system has been established within the AFZ industrial park whereby companies will be responsible for collecting and selectively sorting the different types of waste generated to facilitate the separation of components with environmental risks. Hazardous industrial waste, including zinc-containing dust, will be treated by an approved specialized company for their storage and disposal outside of AFZ.

4.11 WATER RESOURCES

During the construction phase, a risk of water contamination is related to accidental spills from the operation, cleaning, and maintenance of construction equipment (fueling and draining, in particular). Liquid and solid waste from construction facilities can be sources of water contamination if not properly managed. However, the risk is considered low as the site is located within an integrated industrial park with no hydrographic network nearby.

During the operation phase, no impact on groundwater quality is anticipated due to the waterproofing of the plant platform. However, there is a risk of accidental spills of hazardous substances that may reach the AFZ sanitation network and sewage treatment plant (STEP), with the potential to cause surface water contamination in the Sebou River. Therefore, Samta commits to ensuring the pretreatment of its industrial effluent. Only domestic wastewater will be directed to the wastewater treatment plant in accordance with the limits specified. Furthermore, overall effluent flow discharged by the plant is to consist solely of domestic wastewater. To reduce water consumption and achieve a zero liquid discharge, process effluents will undergo an advanced treatment for thorough purification. This in-house wastewater treatment plant enables total recycling and reuse of treated effluent back into the process. Any domestic wastewater is directed to STEP for purification before being discharged into the natural environment.

Further preventative mitigation measures are also recommended including the supervision of handling of fuel, oil, or other contaminating products, planning for measures in case of accidental spills, such as using absorbent materials, removing the potentially affected soil layer by hydrocarbons, and disposing of it properly or sending it to an authorized landfill.

4.12 SOIL QUALITY

The passage of machinery and workers during certain construction activities will cause slight soil compaction around the site. However, the main concerns will be related to earthworks, including excavations and embankments necessary for the construction and development of the Project. There may also be soil pollution resulting from accidental spills of hydrocarbons and various chemicals, paints, clean and used oils, fuels, lubricants, and cleaning products. If

stored in areas without protection against rainwater and runoff or on non-sealed platforms, these products can contaminate the soil and groundwater table through infiltration.

To mitigate these impacts, the storage area for hazardous waste must be equipped with an impermeable and watertight lining. The Project must also ensure specific management for each category of waste, adhering to best practices for environmental protection. This includes storing all liquid products on sealed concrete platforms equipped with appropriate retention structures. Furthermore, worker's handling of labeled hazardous and/or toxic products at the construction site should receiving training focusing on environmental protection, workplace safety, and first aid procedures.

5. SOCIAL IMPACTS AND OPPORTUNITIES

During both the construction and operation phase, the main negative social impacts relate to the health and safety of both workers and the public. This includes a risk of work-related accidents as well as exposure to dust and pollutants. If additional mitigation measures identified by the ESIA are implemented, the overall significance of residual cumulative impacts will be minor or negligible.

Positive socio-economic impacts identified include the creation of jobs and contribution to the local economy through sourcing from local and regional suppliers.

5.1 COMMUNITY IMPACTS

Positive community impacts include direct and indirect job creation as a result of the Project which will integrate into the value chain of the automobile sector within AFZ.

The operations involved in copper metal and aluminum alloy production will generate dust, including a significant proportion of metallic particles and emissions of gaseous pollutants. These substances can negatively affect ambient air quality. To mitigate this risk, an environmental monitoring program will be implemented to ensure compliance with environmental regulations. Furthermore, a flue gas purification processes is also planned to ensure to ensure emissions are in accordance with Moroccan regulations to protect the environment and public health for neighboring human settlements.

5.2 CONTRACTOR MANAGEMENT, INCLUDING THE SITING AND MANAGEMENT OF WORKER CAMPS

The AFZ is planned to include nearby amenities such as catering and accommodation facilities. However, further considerations in relation to contractor management, particularly in relation to labour standards, are not considered within the impact assessment.

5.3 CULTURAL HERITAGE

No living heritage resources are present in the Project area, and it is unlikely that archaeological resources are present due to the historical and current land use. Accordingly, the impact assessment does not consider cultural heritage and planning for chance finds.

5.4 DISRUPTION AND PUBLIC HEALTH AND SAFETY DURING CONSTRUCTION

A poorly organized construction site where safety measures are not respected poses a threat to public safety. Activities related to the construction of the Project involve the potential physical risks of accidents due to repeated exposure to mechanical actions. Therefore, the

existence of the construction site must be clearly marked, fenced, and access should be restricted to authorized personnel only. It should be noted that this is already the case the entire AFZ, where access is controlled by security personnel.

5.5 IMPACTS ON BUSINESSES AND EMPLOYMENT

The construction site will create a number of direct and indirect jobs (workers, transporters, and security personnel) that will benefit the local labour force. It is estimated that around 150 direct and indirect employment positions will be generated during the construction period, which is expected to last approximately 12 months. Upon opening, the project will generate a total of 200 job opportunities, with 80% of these job opportunities being local permanent contracts. These contracts will include engineers, senior executives and specialized technicians.

The supply of construction materials sourced locally or regionally also has the potential to contribute to the local economy.

5.6 IMPACTS TO EXISTING INFRASTRUCTURE AND PUBLIC SERVICES

THE AFZ hosts extensive existing infrastructure including a deep-water port, railway station, road networks, sanitation, drinking water supply, electricity, public lighting, and telecommunications. The Project implementation will not result in any bypass of existing roads. Current access will be preserved, causing temporary disruptions during construction works, without harming other infrastructures. To mitigate these impacts, actions to ensure road safety will be exercised, and transportation of material and heavy equipment will be conducted outside of peak hours to minimize disturbances.

Furthermore, the sanitation network and effluent treatment facilities will be managed and maintained by AFZ, ensuring rigorous monitoring of the wastewater and stormwater collection networks.

5.7 LABOUR ISSUES AND STANDARDS

The Project will be located within the AFZ that provides excellent working conditions and enables the effective management of labour issues. Furthermore, the management of the industrial zone is governed by a charter of specifications that must be respected by all parties involved in the AFZ. The AFZ also ensures that employees have access to sanitation, drinking water supply, electricity, public lighting, and telecommunications. Further considerations in relation to labour issues and standards are not considered within the impact assessment.

5.8 LAND ACQUISITION AND RESETTLEMENT

The AFZ is owned by MedZ, a public limited company under the Kingdom of Morocco government for the development of the industrial zone. Samta has purchased the required land parcel from MedZ as per regulatory procedures. It is noted that there was no resettlement and rehabilitation during the procurement of the land from MedZ.

5.9 LOCAL TRAFFIC AND ACCESS IMPACTS

The construction of the Project will lead to some disruptions in road traffic due to transportation operations related to the supply of construction materials and equipment. Furthermore, the traffic related to the project will contribute to traffic associated with other industrial units in the AFZ, causing a cumulative impact.

To mitigate these impacts, Samta will take necessary measures to ensure that truck movements occur outside peak hours to minimize potential disruptions to RN4 traffic. Additionally, truck drivers should be required to limit their speed at the project site's access points and exercise strict vigilance when entering and exiting the construction area. Samta will consistently adhere to the authorized payload of heavy vehicles (regulatory axle load) as set by the Ministry of Equipment and Transport (traffic code).

The road hierarchy and access organization to plots and constructions have also been taken into account by the developer to ensure specific objectives are met, such as ensuring good visibility, easy access to maintenance and emergency services, and proper maneuvering of heavy vehicles. The goal is to ensure smooth and secure traffic while avoiding negative impacts on other road users.

5.10 OCCUPATIONAL AND PUBLIC HEALTH AND SAFETY ISSUES

Activities related to the construction of Project units involve potential physical risks of accidents due to the repeated exposure to rotating machinery and mobile equipment. The most common accidents on construction sites include slips, trips and falls, impacts from blunt objects, or from poorly controlled machinery.

During the operational phase, the personnel working in the proposed plant will be exposed to several risks including equipment-related accidents, exposure to hazardous chemicals, thermal risks related to metal melting, waste and emissions management, and ergonomic issues associated with heavy loads. To mitigate these risks, it is necessary to take safety measures including adequate training, use of appropriate personal protective equipment (PPE), as well as implementation of risk management protocols to ensure the safety of personnel. The use of storage facilities must also comply with strict rules, regularly monitored by a Health, Safety and Environment (HSE) manager.

To mitigate any risks to public health and safety, the existence of the construction site must be clearly marked and fenced with access restricted to authorized personnel only. Access to the entire AFZ industrial zone is also controlled by security, with access restricted to authorized personnel also.

Furthermore, an emergency response plan is recommended which should include a description of how to respond in the event of accidents, leaks, spills, or fires. Emergency instructions should be well understood by employees and be subject to training procedures (e.g. Rescue and First Aid).

6. COMMUNICATIONS

6.1 CONTACT DETAILS

Address:	1.113 bis, Atlantic Free Zone - Commune Ameer Seflia RN4 - Kenitra
Person in charge:	Bachir FASSI FEHRI (Chief Executive Officer)
Tel:	+212 (0) 6 61 819 824
Email address:	Samta.morocco@samta.net

6.2 PROCESS FOR ADDRESSING ANY ISSUES ARISING

Samta has prepared a grievance procedure to formalise a system to handle grievances received from communities, individuals, NGOs and the local government. It also aims to

ensure grievances are treated efficiently and in a transparent manner. The procedure will be shared and implemented internally within the project and with all project staff, community members and their local representatives. Details of the grievance procedure are contained in the project Stakeholder Engagement Plan (see below).

6.3 LINK TO STAKEHOLDER ENGAGEMENT PLAN

A stakeholder engagement plan (SEP) has been prepared by Samta, which recognizes the importance of open and transparent engagement between the project, its workers, worker representatives, local communities and persons affected by the project and where appropriate, other project stakeholders as an essential element of good international practice and corporate citizenship. <<<INSERT LINK TO PUBLISHED SEP>>>