

SOHAR ALUMINIUM

Biodiversity Action Plan (BAP) 2026

Document Owner	EHS / Environment Department
Prepared for	Sohar Aluminium Sustainability, EHS and Operations Teams
Document Period	2026-2030
Applicable Areas	Smelter, Captive Power Plant (SAPP), Port, Logistics, Contractors and Area of Influence

Document Control

Document Title	Sohar Aluminium Biodiversity Action Plan 2026
Document Number	EHS-BAP-2026
Version	00
Prepared by	Environment / Sustainability Team
Reviewed by	EHS Manager
Approved by	Chief Operations Officer

Executive Summary

This Biodiversity Action Plan provides a structured five-year framework for identifying, managing, monitoring and enhancing biodiversity and ecosystem services associated with Sohar Aluminium operations. It covers the smelter, captive power plant, port activities, supporting infrastructure, landscaped areas, marine interfaces and contractor activities within the Area of Influence.

The plan is designed to support ASI Principle 8 expectations, including biodiversity risk assessment, ecosystem services management, application of the mitigation hierarchy, protected area screening, clear action planning, measurable indicators, accountability and evidence suitable for internal assurance, management review and certification readiness.

The 2026-2030 programme focuses on practical biodiversity outcomes: improved baseline information, stronger monitoring and reporting, protection of terrestrial and marine receptors, responsible landscaping, native tree and pollinator enhancement, contractor controls, emergency preparedness and stakeholder partnerships.

1. Purpose and Commitments

The purpose of this BAP is to establish a site-level biodiversity management framework that prevents, minimises, restores and, where necessary, offsets biodiversity impacts associated with Sohar Aluminium activities.

- Achieve no net loss of biodiversity where practicable for existing operations and future changes.
- Progressively move toward a net positive biodiversity contribution by 2030 through measurable enhancement actions.
- Protect terrestrial and marine biodiversity receptors within the Area of Influence.

- Integrate biodiversity considerations into operational decision-making, project management and contractor control.
- Maintain evidence for ASI, ISO 14001, sustainability reporting and management review.
- Promote employee, contractor and stakeholder awareness of biodiversity protection requirements.

2. Scope

2.1 Operational Scope

Area	Activities Covered	Biodiversity Interfaces
Smelter	Potlines, casthouse, carbon plant, workshops, warehouses, roads, stormwater and landscaping	Air emissions, dust, fluoride deposition, vegetation, birds, wildlife interaction and green areas
Captive Power Plant (SAPP)	Power generation, fuel systems, water intake/discharge, cooling systems and maintenance areas	Marine intake/discharge, fuel spill risk, cooling water, noise, lighting and landscaped areas
Port and Logistics	Raw material unloading, storage, conveyors, quay interface, shipping, logistics and port movements	Marine waters, coastal birds, dust, spill risk, ballast/waste controls and vehicle movement
Contractors and Projects	Construction, maintenance, landscaping, cleaning, pest control and civil works	Habitat disturbance, vegetation removal, chemical use, waste management and wildlife disturbance

2.2 Exclusions and Interfaces

This BAP does not replace regulatory environmental permits, EIAs, operation environmental management plans, emergency response plans or ISO 14001 procedures. It complements those systems by translating biodiversity-related risks into actions, owners, indicators and review mechanisms.

3. Standards and Reference Frameworks

Framework	Relevance to BAP
ASI Performance Standard V3/V3.1	Principle 8 requirements covering biodiversity and ecosystem services risk assessment, management planning, mitigation hierarchy and monitoring.
IFC Performance Standard 6	Biodiversity conservation and sustainable management of living natural resources.
ISO 14001:2015	Environmental aspects, compliance obligations, operational control, monitoring and continual improvement.
Oman Vision 2040	National direction for environmental protection, resource efficiency and sustainable development.
CBD Global Biodiversity Framework	Global framework supporting habitat protection, restoration and biodiversity mainstreaming.
Sohar Aluminium EHS / EMS Requirements	Internal procedures, monitoring programmes, emergency preparedness and sustainability reporting processes.

4. Area of Influence (Aoi)

The Area of Influence is defined as the direct operational footprint and surrounding areas where biodiversity and ecosystem services may be affected by routine activities, abnormal events, projects or historical impacts. The Aoi shall be reviewed when new projects, major modifications or changes to receptors occur.

Aoi Component	Description	Examples of Receptors
Direct footprint	Land and infrastructure controlled by Sohar Aluminium	Landscaped areas, drains, roads, yards, tree belts, buildings
Terrestrial influence zone	Areas potentially affected by air emissions, dust, noise, light, drainage or vehicle movement	Vegetation, birds, reptiles, pollinators and small mammals
Marine influence zone	Port, intake, discharge and adjacent marine interface potentially affected by operations	Fish, plankton, benthos, sediment quality, water quality, coastal birds
Atmospheric deposition zone	Potential impact zone for dust, fluoride and air emissions	Sensitive vegetation, landscaped areas and nearby receptors
Contractor and project zones	Temporary work areas and laydown areas	Disturbed soil, vegetation, fauna and drainage pathways

5. Biodiversity Baseline

5.1 Baseline Data Sources

- Historical Environmental Impact Assessment records for smelter, power plant and port areas.
- Existing environmental monitoring data including air emissions, fluoride, stormwater, wastewater, marine water and sediment results.
- Landscaping and tree inventory records, including survival and maintenance observations.
- Incident and observation records relating to birds, reptiles, insects, pollinators and mammals.
- Protected area screening, regulatory records and stakeholder information from competent authorities or specialist consultants.
- Future specialist ecology surveys to close information gaps.

5.2 Terrestrial Baseline

Habitat / Feature	Known or Potential Value	Potential Pressure
Landscaped greenbelt and gardens	Shade, microhabitat, pollinator support, carbon storage and visual screening	Water stress, heat, pest control, soil salinity, fluoride/dust sensitivity
Industrial open land and disturbed areas	Potential future restoration or pollinator habitat opportunities	Vehicle movement, construction disturbance, waste, invasive species
Drainage channels and stormwater areas	Temporary habitat during rainfall events and spill pathway control	Contamination, silt, weeds, poor housekeeping
Bird-use areas	Resting, nesting or feeding opportunities for resident and migratory species	Noise, lighting, traffic, building collision, waste attractants

5.3 Marine Baseline

The marine baseline shall focus on operational interfaces at the port and power plant intake/discharge areas. Surveys should consider water quality, sediment quality, benthic condition, plankton, fish observations, coastal birds, accidental release pathways and receiving-environment sensitivity.

Table 5.3.1 Marine Species of Conservation Concern Register

Tier	Common Name	Scientific Name	IUCN Status	Relevance to Sohar Area
Priority Receptor	Arabian Sea Humpback Whale	<i>Megaptera novaeangliae</i>	Endangered (EN)	Regional marine megafauna receptor sensitive to vessel traffic, underwater noise and marine pollution.
Priority Receptor	Whale Shark	<i>Rhincodon typus</i>	Endangered (EN)	Occurs within Gulf of Oman waters; vulnerable to vessel strikes, fisheries interactions and marine pollution.
Priority Receptor	Hawksbill Turtle	<i>Eretmochelys imbricata</i>	Critically Endangered (CR)	Sensitive to coastal disturbance, marine debris, oil pollution and habitat degradation.
Priority Receptor	Green Turtle	<i>Chelonia mydas</i>	Endangered (EN)	Important Omani marine turtle species potentially affected by marine habitat quality and pollution.
Priority Receptor	Indian Ocean Humpback Dolphin	<i>Sousa plumbea</i>	Endangered (EN)	Coastal dolphin species sensitive to nearshore vessel activity, underwater noise and water quality degradation.
Priority Receptor	Scalloped Hammerhead Shark	<i>Sphyrna lewini</i>	Critically Endangered (CR)	Regionally important threatened shark species occurring within the wider Arabian Seas region.
Priority Receptor	Giant / Oceanic Manta Ray	<i>Mobula birostris</i>	Endangered (EN)	Sensitive pelagic ray vulnerable to fisheries bycatch and marine pollution.
Priority Receptor	Oman Cownose Ray	<i>Rhinoptera jayakari</i>	Endangered (EN)	Marine inshore species occurring in Omani waters; threatened by bycatch, habitat degradation and coastal pressures.
Priority Receptor	Oman Numbfish	<i>Narcine atzi</i>	Vulnerable (VU)	Demersal marine species occurring in Omani waters and susceptible to fisheries bycatch and discard mortality.
Data Gap / Watchlist	Oman Guitarfish	<i>Acroteriobatus omanensis</i>	Data Deficient (DD)	Restricted Sea of Oman species potentially vulnerable to coastal fisheries and habitat disturbance.
Data Gap / Watchlist	Bigeye Numbfish	<i>Narcine oculifera</i>	Data Deficient (DD)	Known from the Sea of Oman and Arabian Sea region; limited ecological information available.
Data Gap / Watchlist	Oman Bullhead Shark	<i>Heterodontus omanensis</i>	Data Deficient (DD)	Omani endemic/regional shark species requiring

				further research and monitoring.
Data Gap / Watchlist	Gulf of Oman Sand Stargazer	Stalix omanensis	Data Deficient (DD)	Known from northern Gulf of Oman records only; included for future ecological screening.
Data Gap / Watchlist	Oman Worm Eel	Yirrkala omanensis	Data Deficient (DD)	Known only from Gulf of Oman records; included as a regional biodiversity data-gap species.
Data Gap / Watchlist	Oman Estuarine Goby	Oxyurichthys omanensis	Data Deficient (DD)	Northern Oman estuarine species; relevant where estuarine or coastal habitats are considered in future assessments.



7. Mitigation Hierarchy

All routine activities, abnormal events, maintenance jobs, construction works and future projects shall apply the mitigation hierarchy in the order below. Avoidance is preferred and must be considered before minimisation, restoration or offsetting.

Step	Meaning	Examples for Sohar Aluminium
Avoid	Prevent impacts before they occur	Locate laydown areas away from vegetation; avoid unnecessary tree removal; prevent discharge to stormwater drains
Minimise	Reduce unavoidable impacts to acceptable levels	Dust suppression, emission controls, spill prevention, controlled pesticide use, speed control and contractor supervision
Restore	Repair disturbed areas and recover ecological value	Replant disturbed soil, replace damaged trees, clean contaminated areas and restore drainage integrity

Offset / Compensate	Last resort for residual impacts after avoidance, minimisation and restoration	Support native tree, mangrove, coastal restoration or community biodiversity initiatives where applicable
---------------------	--	---

8. Strategic Objectives and 2030 Targets

Objective	2030 Target	Primary KPI	Owner
Maintain ASI Principle 8 readiness	Evidence file maintained and reviewed annually	100% of required evidence categories reviewed annually	Environment / Sustainability
Prevent biodiversity incidents	Zero major biodiversity incidents	Number of biodiversity incidents	All Area Owners / EHS
Improve terrestrial biodiversity	Greenbelt and native/adapted planting enhanced	Tree survival rate $\geq 85\%$; annual planting target achieved	EHS / CSR / Landscaping Contractor
Strengthen marine biodiversity protection	Marine monitoring and spill resilience improved	Annual marine ecology review completed with local authority	Environment / Power Plant / Port
Embed biodiversity awareness	Employees and contractors understand biodiversity controls	Training completion $\geq 95\%$ for target groups	EHS Training / Contractors
Engage external stakeholders	At least one biodiversity partnership or engagement per year	Number of active partnerships / engagements	Sustainability / CSR

9. Detailed Action Plan 2026-2030

No.	Action	Year(s)	Priority	Owner	KPI / Evidence	Status
1	Update biodiversity baseline register covering smelter, SAPP, port, greenbelts and marine interfaces	2026	High	Environment	Approved baseline register and maps	Not started
2	Implement flora survey including tree health, canopy condition, native/adapted species and invasive species screening	2026-2030	High	Environment / Landscaping Contractor	Annual flora survey report	Not started
3	Review tree planting and survival programme with $\geq 85\%$ survival target	2026-2030	High	EHS / CM	Planting records, survival audit, replacement log	Not started
4	Update contractor biodiversity requirements for landscaping, pest control, excavation and civil works	2026	High	EHS / Procurement / Contracts/ CM	Contractor requirements and induction records	Not started

5	Integrate biodiversity checks into Management of Change and project EHS review	2026	High	EHS / Engineering	MOC checklist and evidence of project screening	Not started
6	Review pesticide and herbicide selection and application controls for biodiversity sensitivity	2026; annual	Medium	Environment / Contractor	Approved chemical list and application records	Not started
7	Run biodiversity awareness campaign for employees and contractors	2026-2030	Medium	EHS Training / Sustainability	Training records, campaign material and attendance	Not started
8	Include biodiversity scenario in at least one emergency drill related to spill, stormwater or marine release	2027; 2029	Medium	Emergency Response / EHS	Drill report including ecological impact assessment	Not started
9	Publish biodiversity performance summary in sustainability reporting and management review	2026-2030	High	Sustainability / Environment	Annual sustainability disclosure and management review minutes	Not started
10	Develop external partnership with Environment Authority, university, NGO or port stakeholder for conservation initiative	2026-2030	Medium	CSR / Sustainability	Partnership record and project progress report	Not started

10. Monitoring Programme

Monitoring Aspect	Frequency	Method / Scope	Responsible	Output
Flora and tree health	Annual; six monthly visual checks	Tree inventory, survival rate, canopy condition, leaf stress and replacement needs	Environment / Contractor	Flora survey report and tree survival dashboard
Bird monitoring	Annual during suitable season	Visual observation, point counts or specialist survey in selected areas	Environment / Specialist	Bird monitoring report
Marine water and ecology	Annual ecology review; routine water quality as per permit/EMS	Review intake/discharge, port water, sediment/biological indicators as applicable	Environment / Power Plant / Port	Marine monitoring summary

Fluoride / vegetation impact	Quarterly	Sample for plant health and relevant environmental monitoring data review	Environment	Vegetation impact assessment records
Landscaping and irrigation	Quarterly	Irrigation network condition, water stress, pest control, chemical use and replacement needs	Landscaping Contractor / EHS	Monthly inspection report
Waste, spills and drainage	Monthly and after incidents/rainfall	Housekeeping, spill risks, stormwater drains and sensitive pathways	Area Owners / EHS	Inspection and corrective action records
Biodiversity incidents	Continuous	Wildlife mortality, injured fauna, vegetation loss, spills affecting biodiversity	All employees / EHS	Incident report and lessons learned
BAP implementation	Quarterly	Action tracker progress, overdue actions, KPIs	Environment / Sustainability	Quarterly BAP dashboard

11. Biodiversity KPI Dashboard

KPI	Target	Frequency	Owner	Evidence
Major biodiversity incidents	Zero	Monthly / Annual	EHS	Incident register
Biodiversity legal non-compliance	Zero	Annual	EHS / Compliance	Compliance register
BAP actions completed on time	>=90%	Quarterly	Environment	Action tracker
Ecological surveys completed	100% of planned surveys	Annual	Environment	Survey reports
Tree survival rate	>=85%	Semi-annual	EHS / Contractor	Survival audit
Biodiversity training completion	>=95% of target groups	Annual	EHS Training	Training records
Stakeholder engagement	Minimum 1 relevant engagement/year	Annual	Sustainability / CSR	Engagement record

12. Marine Biodiversity Programme

- Maintain spill prevention, emergency response and containment readiness for marine-facing activities.
- Review cooling water intake and discharge monitoring from a biodiversity receptor perspective.
- Include port and marine interface observations in environmental inspections.
- Assess opportunities to support coastal clean-ups, mangrove initiatives or national marine conservation programmes.
- Ensure significant marine incidents trigger ecological impact assessment, corrective action and recovery monitoring.

13. Terrestrial Biodiversity Enhancement Programme

- Maintain a tree inventory with species, location, health condition, planting year and survival status.
- Prioritise native or climate-adapted species with lower water demand and higher ecological value.

- Develop pollinator habitats using suitable flowering species and chemical-use controls.
- Use replacement planting where trees are damaged, removed or lost due to weather or operational causes.
- Improve shaded green corridors where practicable without compromising safety, security or operations.

14. Contractor and Project Controls

Control Area	Minimum Requirement	Evidence	Responsible
Vegetation removal	No removal without EHS/environment review and replacement plan where applicable	Permit, photos, replacement records	Project Owner / EHS
Excavation and soil disturbance	Prevent uncontrolled drainage, dust, waste and habitat disturbance	PTW, inspection checklist	Contractor / Area Owner
Pest control	Use approved methods and avoid harm to non-target species	Approved chemical list and application log	Contractor / Environment
Waste handling	Prevent litter, food waste and hazardous waste releases that attract or harm fauna	Waste inspection records	Contractor / EHS
Wildlife encounter	Do not harm, feed, trap or remove wildlife without EHS guidance	Incident/observation record	All personnel
Lighting and noise	Minimise unnecessary lighting/noise where safe and practicable	Project design review	Engineering / Area Owner

15. Emergency Preparedness for Biodiversity Incidents

Biodiversity-related emergencies shall be managed through the existing emergency preparedness and response framework, with added ecological assessment and recovery monitoring where receptors may be affected.

- Oil, fuel or chemical spill reaching soil, drainage channels or marine waters.
- Major uncontrolled air emission, dust event or fire affecting vegetation.
- Wildlife mortality event or repeated fauna incidents.
- Stormwater contamination or flood-related contaminant release.
- Accidental destruction of vegetation or habitat during projects.

Emergency Response Sequence

1. Stop work and make the area safe.
2. Contain the release or prevent further impact.
3. Notify EHS and area management.
4. Assess affected biodiversity receptors and document evidence with photographs.
5. Implement corrective action and restoration measures.
6. Monitor recovery and close actions only after verification.
7. Share lessons learned through EHS communication.

16. Stakeholder Engagement and Partnerships

- Environment Authority engagement where regulatory guidance, protected species or national biodiversity initiatives are relevant.
- Sohar Port and industrial stakeholders for marine and coastal interface topics.

- Universities or ecology specialists for biodiversity surveys and research support.
- CSR partners for native tree planting, mangrove support, coastal cleanup and awareness campaigns.
- Employees and contractors through awareness, toolbox talks and biodiversity reporting channels.

17. 2030 Success Criteria

- No major biodiversity incident or biodiversity-related legal non-compliance.
- Biodiversity baseline register and Aol map maintained and refreshed.
- Annual flora, bird and marine monitoring completed and reviewed.
- Tree planting and survival programme operating with at least 85% survival target.
- Biodiversity considerations embedded into projects, contractor management and emergency preparedness.
- Clear annual disclosure of biodiversity performance in sustainability reporting.
- Demonstrable progress toward no net loss and net positive biodiversity contribution aspirations.

Appendix A - Source References

- ASI Performance Standard Guidance V3.3, December 2024, Principle 8 biodiversity and ecosystem services guidance.