



Scoping Report Summary

Environmental and Social Impact
Assessment

PREPARED FOR

OKLAHOMA
PRIMARY ALUMINUM

DATE

13 March 2026

REFERENCE

0793283



ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT SCOPING REPORT SUMMARY

1. PURPOSE OF THIS DOCUMENT

This document is a summary of the Environmental and Social Impact Assessment (ESIA) Scoping Report for the Oklahoma Primary Aluminum project. It explains what the project involves, what will be studied, why each topic matters to local communities and the surrounding environment, and how the community can have a say before construction begins.

2. PROJECT OVERVIEW

Emirates Global Aluminum (EGA) and Century Aluminum USA (Century) propose to build a new, modern aluminum smelter at the Tulsa Port of Inola (the Project). Today, approximately 85 percent of U.S. aluminum needs are met by imports. This project would bring that production home, creating thousands of long-term jobs, generating significant state and local tax revenue, and strengthening American manufacturing in aviation, automotive, construction, and defense industries. Early site preparation work is anticipated to begin in late 2026 and operations are expected to begin in 2030.

This Project aims to deliver major and lasting economic benefits for Oklahoma and the U.S., while safeguarding the environment and strengthening Oklahoma's position in the American manufacturing supply chain.

3. ABOUT EGA AND CENTURY

EGA has been producing aluminum for over 45 years, beginning in Dubai, UAE in 1979. EGA's connection to the United States stretches back to those early days, when American expertise and equipment helped build the foundation of what is now the world's largest 'premium aluminum' producers. Today, EGA supplies metal to more than 400 customers in over 50 countries and is the largest industrial company in the UAE outside of oil and gas. Through its North American base in St. Louis, EGA is already one of the largest suppliers of aluminum to U.S. industries supporting tens of thousands of American jobs in aerospace, automotive, construction, energy, and defense. EGA is a member of the Aluminum Stewardship Initiative and is recognized internationally for technological leadership, rigorous environmental management, and commitment to the communities and countries where it operates.

Century Aluminum was founded in 1995 and is today the largest producer of primary aluminum in the United States, headquartered in Chicago, Illinois. Century operates aluminum smelters in Kentucky and South Carolina and has production facilities in Iceland, the Netherlands, and Jamaica. Century brings deep U.S. operational expertise and a strong commitment to responsible production. Century continuously works to reduce the carbon footprint of its products, protect human rights, and provide a safe and fair workplace for its workforce. Century's ambition is to integrate health, safety, and environmental responsibility into every aspect of how it operates.

4. PROJECT LOCATION AND FEATURES

The Project Site is a 437.5-acre lot within the Tulsa Port of Inola industrial park, about 3 miles west of Inola and 24 miles east of Tulsa, Oklahoma. The land is privately owned and within lands over which the Muscogee (Creek) Nation have authority in tribal matters. It is currently undeveloped, historically used for grazing, and zoned for heavy industrial use with direct access to the Verdigris River, rail, and major highways.

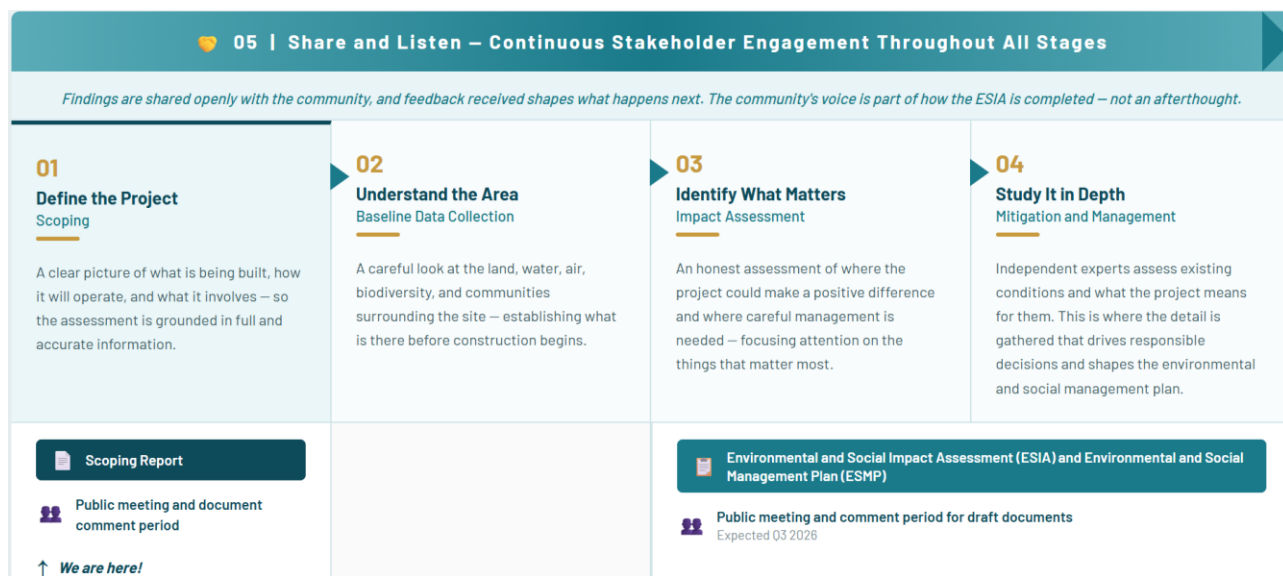
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5. COMMITMENT TO ENVIRONMENTAL, SOCIAL, AND HEALTH & SAFETY VALUES

In addition to full compliance with all U.S., Oklahoma, and local regulations, EGA and Century are voluntarily conducting an ESIA. An ESIA is a structured process for understanding, before construction begins, what a project means for the environment and the community. EGA and Century's commitments through this process include protecting local land, biodiversity, air and water quality, minimizing greenhouse gas emissions through best-available technology, ensuring strong worker and community health and safety practices, and engaging openly with the public and federally recognized tribes.

The ESIA is being conducted in alignment with respected international best practice standards, including the Equator Principles and the International Finance Corporation Performance Standards. The process is outlined on the figure below.

THE FIVE STEPS OF THE ESIA PROCESS



WHERE ARE WE NOW?

We are at Step 1 of the ESIA process—this document is a summary of the ESIA Scoping Report. The full impact assessment and development of an Environmental and Social Management Plan (ESMP) will follow, with further opportunities for community input along the way.

The ESIA process identifies and evaluates both the potential benefits of the Project and its potential effects on the existing environment and socioeconomics. The ESIA informs Project design and decision making by integrating environmental and social considerations into risk management throughout Project development. In addition, the ESIA promotes transparency and provides opportunities for stakeholder participation in identifying, understanding, and managing the Project's effects prior to construction.

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Baseline data collection is ongoing in parallel with scoping. Baseline studies take a careful look at the air, land, water, wildlife and biodiversity, and communities at and near the Project site. The Scoping Report provides a clear outline of what the proposed Project is, why it is proposed, and what is involved in its construction and operation. It also provides an overview of the existing environmental and social setting based on baseline data collection to date and identifies the potential Project benefits and environmental and social risks to be assessed and understood in the ESIA.

The Impact Assessment and Mitigation and Management phases work together as a continuous and iterative process. As potential impacts are identified and assessed, mitigation measures are developed in parallel, with the goal of avoiding adverse impacts wherever possible, reducing those that cannot be avoided, and remedying any residual effects. At the same time, opportunities to enhance the positive benefits the Project can deliver for the community and environment are identified and built into the Project design.

The detailed engineering design phase—during which emissions monitoring specifications, equipment controls, and operational parameters will be finalized—is running in parallel with the ESIA process through 2026. Key design decisions will be reflected in the two documents that bring this process to completion:

The Environmental and Social Impact Assessment sets out the full findings of the assessment—what was studied, what was found, how impacts and benefits were evaluated, and what measures will be put in place to manage the Project responsibly.

The Environmental and Social Management Plan translates those findings into a practical governance framework—defining the specific actions, responsibilities, monitoring commitments, and reporting obligations that will apply throughout construction and operations. The ESMP sits at the heart of how the Project will be managed on the ground.

Both documents will be shared in draft form with stakeholders and the public for review and comment, expected in Q3 2026 before they are finalized ahead of construction. This gives the community a formal opportunity to review the proposed approach to monitoring and management—including what is being monitored, how often, how alarms and breaches are handled, and how data will be reported—before any design is finalized and before construction begins. Questions or concerns raised during that review will be taken seriously and addressed before moving forward.

Updates will be posted on the project website at oklahomaprimarialuminum.com as key decisions are made. Anyone with specific questions at any stage is welcome to reach out directly through the website or at the Open House.

6. SCOPING OF POTENTIAL IMPACTS AND MANAGEMENT

The topics below were identified through the Scoping Phase, informed by community input, baseline data, and expert experience. For each topic we explain why it matters and what EGA and Century commit to doing.

Topic	Why it matters to the Community	What the ESIA will do – and what EGA & Century commit to
Socioeconomics	The community has a right to understand what economic benefits will actually reach local people - in terms of jobs, local business activity, tax revenues, and demands on public services.	<ul style="list-style-type: none"> ✓ Independent socioeconomic studies will estimate direct and indirect job creation, business activity, and local and state tax revenues ✓ Potential changes in community services and infrastructure will be identified so local and state partners can plan effectively ✓ EGA and Century are committed to prioritizing local hiring and procurement wherever possible
Air Quality	The Project recognises the importance of clean air and the community deserves to know what emissions the facility will produce, how far they could travel, and what will be done to minimize emissions and avoid exceedance of safe limits.	<ul style="list-style-type: none"> ✓ Best-available air pollution control technology will be used, including advanced scrubbers and emissions reduction systems ✓ Air dispersion modelling will simulate how emissions move under different weather conditions to confirm all federal and state standards are met ✓ Monitoring will be ongoing throughout the life of the facility, with results reported transparently
Noise	Construction and ongoing operations will generate noise. Nearby residents have a right to understand what noise levels to expect, when, and how they will be managed.	<ul style="list-style-type: none"> ✓ Baseline noise monitoring will record existing conditions before construction begins ✓ Future noise levels will be predicted using acoustic modelling ✓ Findings will guide equipment placement, building orientation, and noise reduction measures
Water & Biological Resources	The community and the ecosystems that support it depend on healthy wetlands, streams, and natural drainage. These need to be understood and protected before any construction begins.	<ul style="list-style-type: none"> ✓ Field studies will map the condition and sensitivity of wetlands, streams, and high-value habitats on and around the site ✓ Design decisions will aim to avoid or minimize effects on ecological resources and natural water flow ✓ Where impacts cannot be fully avoided, mitigation measures will be required and monitored

Topic	Why it matters to the Community	What the ESIA will do – and what EGA & Century commit to
<p>Cultural Resources & Tribal Heritage</p>	<p>Federally recognized tribes and the broader regional community will have opportunities to identify cultural resources that may be impacted by the Project. Cultural and historical resources deserve careful identification and genuine respect.</p>	<ul style="list-style-type: none"> ✓ Cultural heritage field studies are being conducted in active coordination with federally recognized tribes and state authorities ✓ Historic structures, archaeological sites and traditional cultural areas may be identified ✓ Where possible, significant features will be avoided entirely; where not possible, appropriate mitigation will be developed with input from tribal and community representatives
<p>Flood Risk</p>	<p>Community members have directly raised concerns about flooding. Any large development can affect how water moves - the Verdigris River and surrounding land must be understood before design is finalized.</p>	<ul style="list-style-type: none"> ✓ A dedicated flood assessment study is underway examining stormwater drainage, river behavior, and off-site flood risk ✓ Project design will be informed by this study to withstand major rainfall events without increasing risk to the community ✓ Stormwater pollution prevention plans will include engineered drainage, filtration measures, and vegetation buffers to protect the Verdigris River
<p>Waste Management</p>	<p>Industrial operations produce waste. The community has a right to know what types of waste will be generated, how they will be managed, and what safeguards will prevent contamination of land or water.</p>	<ul style="list-style-type: none"> ✓ EGA and Century are exploring closed-loop management for key waste streams by identifying local partners ✓ Process wastewater will go to a publicly owned wastewater treatment facility at the Tulsa Port of Inola ✓ Waste management commitments will be set out in the ESMP and subject to regulatory oversight

Topic	Why it matters to the Community	What the ESIA will do – and what EGA & Century commit to
<p>Emergency Response</p>	<p>Oklahoma’s weather and industrial context of the Project require robust preparedness for unexpected events. Workers and nearby residents need confidence that the facility can and will respond effectively if such events occur.’</p>	<ul style="list-style-type: none"> ✓ Detailed emergency response, spill prevention, and weather resilience plans will be developed as part of the ESIA process ✓ Plans will address tornadoes, flooding, equipment failures, and other foreseeable events with clear procedures for workers, residents, and the environment ✓ Plans will be coordinated with local emergency services and updated throughout the life of the Project

7. SCOPING REPORT FEEDBACK

The Scoping Report has been developed and is being offered to the public for review and a 30-day comment period from **March 16 to April 15, 2026.**

Access the Scoping Report:

- Electronic PDF: <https://oklahomaprimarialuminum.com/>
- Hard Copy: Ingersol Public Library in Inola, Oklahoma

We invite you to submit your comments:

- Email: OklahomaPrimaryAluminum@erm.com
- Website: <https://oklahomaprimarialuminum.com/en/contact-us>
- Phone: 855-617-6105

Community Open House:

- March 26, 2026, at 6-8pm
- Fine Arts Center, Inola High School, 801 E Commercial St, Inola, OK 74036

8. NEXT STEPS AND ONGOING ENGAGEMENT

Baseline studies of the Project Site are already underway to identify the existing conditions. Questions and concerns identified through public engagement and comment on the Scoping Report will be taken into consideration as the impacts and mitigation measures are established through the ESIA process.

The next opportunity for public input into the ESIA process occurs when the Draft ESIA Report and Draft ESMP are issued for comment, expected in Q3 2026. Following receipt of public input, the Final ESIA Report will be published and the ESMP will be completed, to be maintained as a living document through the life of the Project, to guide how the Project is constructed and operated.

EGA and Century welcome community and worker feedback at any stage. Please use the Project phone number, email address, and website listed above. The Project team will use these channels to respond to concerns promptly, openly, and on the record throughout the life of the Project.