# Sustainable Project Delivery - Legal Register - Chemical additives plant



Purpose of this register is to record the regulatory requirements that need to be complied with by the project. The register provides traceability of the action that has been taken to address the requirement.

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# 1. Objective

The Legal Register is a listing of acts and regulations, including permits and approvals, applicable to the project or contract. The Legal Register is most useful on contracts and major projects where a significant number of regulations apply. The regulations can be sorted by Project Phase, Discipline, or Activity, and thus more easily managed. The objective of using a Legal Register is to be proactive in managing regulatory requirements and therefore be within compliance for the duration of the project Delivery (SPD) Lead will create and manage the Register, and provide updates to the Project Team on a regular basis. The SPD Lead is included in project activities such as status meetings to constantly inform relevant parties of their upcoming regulatory obligations on behalf of the customer. Creating and maintaining a Legal Register is agree between JESA and the Customer before project initiation and often during project development/Select phase.

### 2. Principals

- The Legal Register must be reviewed and approved by the Customer before use on a project or contract, as the Customer will own the Register.
- The SPD Lead, or designate, shall work with the Discipline Leads and project manager(s) to populate and maintain an accurate status of each legal requirement on the register.
- The SPD Lead, or designate, shall work with the Discipline Leads to determine which legal requirements must be incorporated into the design and who will be responsible for completing required actions.
- The Legal Register can be used to create a Legal Matrix. A Legal Matrix is a table used to visually summarize the Legal Register. By listing project activities in a column and key legislation in a row across the top, markers can be placed to indicate all legislation that will impact a certain project activity.

# 3. Instruction

#### Initiating the Regulatory Framework

The SPD Lead, or designate, shall develop the Legal Register as per the template or the needs of the project/contract.

#### Identifying Regulatory Framework

A Legal Register is normally populated by a regulatory expert. The Customer and Project Manager shall assist with populating the register, and the Customer must approve the Register before use. The Register shall also be approved by the PM prior to use.

# Populating the Register

The framework headings will generally consist of:

- ID
- Phase
- Aspect / Activity
- Impacts
- Jurisdiction
- Type
- Regulatory Requirements

# 4. References

Safe and Sustainable Engineering for Asset Lifecycle (SEAL) Standard (MS-EP-STD-0017) Sustainable Project Delivery - Commitment Register (MS-EP-TEM-0051) Sustainable Solutions Standard (MS-PM-STD-0018)

IFC - Guidelines Environmental, Health, and Safety Guidelines Environmental, Health and Safety Guidelines for Large Volume Inorganic Compounds Manufacturing and Coal Tar Distillation DECEMBER 10, 2007

# 5. Abbreviations

АВН	Agence du Bassin Hydraulique	EHS	Environment, Health & Safety
BAT	Best Available Technologies	HR	Human Resources
CRI	Centre Régional d'Investissement	IASE	Health Safety & Environment
ONG	Organisation Non Gouvernementale	PSE	Programme de Suivi
ОСР	Office Chérifien des Phosphates	SDG	Sustainable Development Goals
		SEAL	Safe and Sustainable

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Phase	Activity/Aspect	Impacts	Jurisdiction	Туре	Legal Requirement	Date	Description	Task	Responsibility	Comments
Water and Liquid disch	1 1			1762	2-3				,	2
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Construction	Water and Liquid discharges	Liquid effluent: Seawater + traces of NaHS	National	Water and Liquid discharges	Decree relating to the use of cloud service providers by entities and vital infrastructures with sensitive information systems or data	Hijri: 18 rabii II 1446   2024-10-22	Construction of a chemical additives plant with liquid effluent containing seawater and traces of NaHS.	Ensure compliance with all applicable regulations regarding liquid effluent discharge.	JESA (EPCM) and INNOX (PMC)	
Construction	Water discharge	Liquid effluent: Seawater + traces of NaHS	National	Water and Liquid discharges	Law relating to Credit Information Bureaus	Hijri: 8 hija 1446   2025-06-05	Construction of a chemical additives plant with liquid effluent containing seawater and traces of NaHS.	Ensure compliance with water discharge regulations during the construction phase of the chemical additives plant.	JESA (EPCM) and INNOX (PMC)	
Construction	Liquid effluent discharge	Seawater discharge with traces of NaHS	National	Water and Liquid discharges	Law relative to trusted services for electronic transactions and the (Date: 21 August 2025)	Hijri: 27 safar 1447   2025-08-21	Construction of a chemical additives plant with a capacity of 20000 T/Y and 75 T/D. Liquid effluent will consist of seawater with traces of NaHS.	Ensure compliance with legal requirements regarding liquid effluent discharge.	JESA (EPCM) and INNOX (PMC)	
Construction	Water discharge	Liquid effluent to sea (seawater + traces of NaHS)	National	Water and Liquid discharges	Decree establishing remuneration for services rendered (11 kaada 1425   2004-12-24)	Hijri: 11 kaada 1425   2004-12-24	Construction of a chemical additives plant with liquid effluent discharge to the sea.	Ensure compliance with regulations on water discharge.	JESA (EPCM) and INNOX (PMC)	
Construction	Water and Liquid Discharges	Liquid effluent: Seawater + traces of NaHS	National	Water and Liquid discharges	Law on the right of access to information, promulgated by Dahir No. 1-18-15 of 5 Journada II 1439 (February 22, 2018)	Hijri: 5 journada II 1439   2018-02-22	Construction of a chemical additives plant with liquid effluent containing seawater and traces of NaHS.	Ensure compliance with water discharge regulations during the construction phase of the chemical additives plant.	JESA (EPCM) and INNOX (PMC)	
Construction	Water Discharges	Liquid effluent: Seawater + traces of NaHS	National	Water and Liquid discharges	Decree relating to chancellery rights, as amended and supplemented, in particular by the (Date: 30 December 1972)	Hijri: 23 kaada 1392   1972-12-30	Construction of a chemical additives plant with liquid effluent containing seawater and traces of NaHS.	Ensure compliance with water discharge regulations during plant construction.	JESA (EPCM) and INNOX (PMC)	The specific requirements of the decree need to be identified and addressed. Further investigation is needed to determine the exact nature and volume of the discharge and the relevant permits required.
Construction	Water and Liquid discharges	Liquid effluent: Seawater + traces of NaHS	National	Water and Liquid discharges	Concerning trusted services for electronic transactions, promulgated by Dahir n° 1-20-100 of 16 Journada I 1442 (December 31, 2020)	Hijri: 16 journada l 1442   2020-12-31	Construction of a chemical additives plant with liquid effluent containing seawater and traces of NaHS.	Ensure compliance with legal requirements regarding water and liquid discharges during the construction phase of the chemical additives plant.	JESA (EPCM) and INNOX (PMC)	
Construction	Water Discharges	Liquid effluent: Seawater + traces of NaHS	National	Water and Liquid discharges	Approval of an international bond loan for a total nominal amount of 2 billion euros	Hijri: 3 chaoual 1446   2025-04-02	Construction of a chemical additives plant with liquid effluent containing seawater and traces of NaHS.	Ensure compliance with water discharge regulations during the construction phase of the chemical additives plant.	JESA (EPCM) and INNOX (PMC)	
Construction	Liquid effluent discharge	Discharge of seawater with traces of NaHS	National	Water and Liquid discharges	According to the amended and supplemented regulations on maritime fishing, particularly article 29;	Hijri: 27 chaoual 1393   1973-11-23	Construction of a chemical additive plant with liquid effluent discharge to be managed according to regulations.	Ensure compliance with water discharge regulations during plant construction.	JESA (EPCM) and INNOX (PMC)	
Construction	Water Discharges	Liquid effluent discharge to the sea containing traces of NaHS	National	Water and Liquid discharges	Regulation on maritime fishing of 27 Chaoual 1393 (November 23, 1973), as amended and supplemented.	Hijri: 27 chaoual 1393   1973-11-23	Construction of a chemical additives plant with liquid effluent discharge to the sea.	Ensure compliance with water discharge regulations during plant construction and operation.	JESA (EPCM) and INNOX (PMC)	
Construction	Water Discharges	Liquid effluent: Seawater + traces of NaHS	National	Water and Liquid discharges	Decree relating to the interconnection of telecommunications networks, as amended and supplemented; 27 chaoual 1418   1998-02-25	Hijri: 27 chaoual 1418   1998-02-25	Construction of a chemical additives plant with liquid effluent containing seawater and traces of NaHS.	Ensure compliance with water discharge regulations during plant construction.	JESA (EPCM) and INNOX (PMC)	The legal requirement seems unrelated to water discharges. Further clarification is needed on the applicable legislation for water discharge in the relevant jurisdiction.
Construction	Water discharge	Liquid effluent: Seawater + traces of NaHS	National	Water and Liquid discharges	Decree relating to the organization of the national defense administration, as amended and supplemented in particular by the (Date: 13 January 1983)	Hijri: 28 rabii I 1403   1983-01-13	Construction of a chemical additives plant with liquid effluent containing seawater and traces of NaHS.	Ensure compliance with water discharge regulations during the construction phase of the chemical additives plant.	JESA (EPCM) and INNOX (PMC)	
Construction	Water and Liquid discharges	Liquid effluent: Seawater + traces of NaHS	National	Water and Liquid discharges	Law concerning product and service safety, supplementing the dahir of 9 Ramadan 1331 (August 12, 1913) forming the code of obligations and contracts, particularly articles 4 and 5.	Hijri: 9 ramadan 1331   1913-08-12	Construction of a chemical additives plant with liquid effluent containing seawater and traces of NaHS.	Ensure compliance with legal requirements regarding liquid discharges during the construction phase of the chemical additives plant.		The specific legal requirements for liquid discharge during construction need to be identified and addressed. This may involve permits, discharge limits, and monitoring.
Construction	Water and Liquid Discharges	Liquid effluent: Seawater + traces of NaHS	National	Water and Liquid discharges	Law concerning product and service safety, supplementing the dahir of 9 Ramadan 1331 (August 12, 1913) forming the code of obligations and contracts, particularly articles 4 and 5.	Hijri: 9 ramadan 1331   1913-08-12	Construction of a chemical additives plant with liquid effluent containing seawater and traces of NaHS.	Ensure compliance with legal requirements regarding liquid discharges during the construction phase of the chemical additives plant.		The project involves the construction of a new chemical plant. Specific details on the composition and volume of the liquid effluent will need to be determined during the design phase. This will inform the design of appropriate wastewater treatment systems.
Construction	Water discharge	Liquid effluent: Seawater + traces of NaHS	National	Water and Liquid discharges	Law n° 13-09 on renewable energies, promulgated by dahir n° 1-10-16 of 26 safar 1431 (February 11, 2010), as amended and supplemented	Hijri: 26 safar 1431   2010-02-11	Construction of a chemical additives plant with liquid effluent containing seawater and traces of NaHS.	Ensure compliance with water discharge regulations during the construction phase of the chemical additives plant.	JESA (EPCM) and INNOX (PMC)	
Construction	Water and Liquid discharges	Liquid effluent: Seawater + traces of NaHS	National	Water and Liquid discharges	Decree setting the conditions and procedures for issuing and renewing authorizations for maritime fishing establishments, as amended and supplemented, in particular articles 9 and 16;	Hijri: 13 hija 1429   2008-12-12	Construction of a chemical additives plant with liquid effluent containing seawater and traces of NaHS.	Obtain necessary permits for liquid effluent discharge.	JESA (EPCM) in coordination with INNOX (PMC) and NOVADDIX	
			National	Water and Liquid discharges	portant statut de Bank Al-Maghrib, les Bureaux d'information sur le crédit sont assujettis à une contribution au profit de la Banque pour frais de contrôle sur place	Hijri: 19 chaabane 1445   2024-02-29				
Construction	Water discharge	Liquid effluent: Seawater + traces of NaHS	National	Water and Liquid discharges	Arrêté of 16 rabii I 1439 (December 5, 2017) sets out the terms and conditions for granting state financial aid to promote and diversify the exports of agricultural products, as amended and supplemented by the	Hijri: 16 rabii   1439   2017-12-05	Construction of a chemical additives plant with liquid effluent containing seawater and traces of NaHS.	Ensure compliance with water discharge regulations during the construction phase of the chemical additives plant.	JESA (EPCM) and INNOX (PMC)	
Construction	Water and Liquid discharges	Liquid effluent: Seawater + traces of NaHS	National	Water and Liquid discharges	Decree [number] of July 6, 2010, sets limit values for the discharge, emission, or release of pollutants into the air from stationary pollution sources and the methods for their control, in particular articles 5 and 16.	Hijri: 23 rejeb 1431   2010-07-06	Construction of a chemical additives plant with liquid effluent containing seawater and traces of NaHS.	Ensure compliance with Decree [number] of 2010-07-06 regarding limit values for the discharge of pollutants into water.	JESA (EPCM) and INNOX (PMC)	
Construction	Water and Liquid discharges	Liquid effluent: Seawater + traces of NaHS	National	Water and Liquid discharges	Decree delegating power regarding the scheduling of expenditures from the special allocation account no. 3.1.00.03 entitled "Fund supporting competition services, control, consumer protection, market regulation and safety stocks"	Hijri: 12 chaoual 1446   2025-04-11	Construction of a chemical additives plant with liquid effluent containing seawater and traces of NaHS.	Ensure compliance with water discharge regulations.	JESA (EPCM) and INNOX (PMC)	

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Construction	Water and Liquid discharges	Liquid effluent: Seawater + traces of NaHS	National	Water and Liquid discharges	Decree n° 2-24-921 of 18 rabii II 1446 (October 22, 2024) concerning the use of cloud service providers, as amended by N° 7432 - 27 safar 1447 (August 21, 2025) OFFICIAL BULLETIN 2345. Classic external hosting services, whether dedicated or shared, are considered laaS services under this framework.	Hijri: 18 rabii II 1446   2024-10-22	Construction of a chemical additives plant with liquid effluent containing seawater and traces of NaHS.	Ensure compliance with Decree n° 2-24-921 regarding liquid discharge.	JESA (EPCM) and INNOX (PMC)	
Construction	Water and Liquid discharges	Liquid effluent: Seawater + traces of NaHS	National	Water and Liquid discharges	Law n° 103-12 concerning credit institutions and similar bodies, promulgated by Dahir n° 1-14-193 of 1 Rabi I 1436 (December 24, 2014), or any other public or private body having the quality of supplier within the meaning of Article 20 below having concluded a contract with the Credit Information Bureau in accordance with the provisions of this law; 9	Hijri: 8 hija 1446   2014-12-24	Construction of a chemical additives plant with liquid effluent containing seawater and traces of NaHS.	Ensure compliance with water discharge regulations during the construction phase of the chemical additives plant.	JESA (EPCM) and INNOX (PMC)	The provided legal text seems unrelated to water discharge regulations. Further clarification is needed on the applicable legislation for water discharge in the relevant jurisdiction.
Construction	Liquid effluent discharge	Seawater discharge with traces of NaHS	National	Water and Liquid discharges	The provided legal text does not appear to relate to water and liquid discharge regulations. It seems to concern telecommunications, public services, and data protection.	Hijri: 8 hija 1446   2025-06-05	Construction of a chemical additive plant with a capacity of 20000 T/Y and 75 T/D. Liquid effluent will consist of seawater with traces of NaHS.	Ensure compliance with all applicable water discharge regulations during the construction phase of the chemical additive plant.	JESA (EPCM) and INNOX (PMC)	
Construction	Water and Liquid discharges	Liquid effluent: Seawater + traces of NaHS	National	Water and Liquid discharges	Law n°09-08 aforementioned; - conclude a contract with Credit Information Bureaus offering, in particular, all guarantees regarding the preservation of the security and confidentiality of the transmitted data; - adhere to the code of conduct referred to in Article 17 above; - provide the Credit Information Bureau, within the deadlines provided for in the contract referred to in the 2nd paragraph above, information relating to its clients who have given their consent for sharing.	Hijri: 8 hija 1446   2025-06-05	Construction of a chemical additives plant with liquid effluent containing seawater and traces of NaHS.	Ensure compliance with water discharge regulations.	JESA (EPCM) and INNOX (PMC)	
Construction	Water discharge	Liquid effluent: Seawater + traces of NaHS	National	Water and Liquid discharges	Dahir nº I-19-98 of 5 kaada 1440 (July 8, 2019) approves the Agreement and the Complementary Agreement concerning the hosting of the Regional Coordination Unit (UCR) under the United Nations Convention to Combat Desertification.	Hijri: 5 kaada 1440   2019-07-08	Construction of a chemical additives plant with liquid effluent containing seawater and traces of NaHS.	Ensure compliance with water discharge regulations during plant construction.	JESA (EPCM) and INNOX (PMC)	The legal requirement does not directly relate to construction activities, but water discharge permits are typically required during the construction phase. Further investigation is needed to determine the specific applicability of the cited law to this project.
Construction	Water discharge	Liquid effluent to sea (seawater + traces of NaHS)	National	Water and Liquid discharges	Law n° 48-15 (2025-08-21)	Hijri: 27 safar 1447   2025-08-21	Construction of a chemical additives plant with liquid effluent discharge to the sea containing seawater and traces of NaHS.	Ensure compliance with water discharge regulations.	JESA (EPCM) and INNOX (PMC)	
			National	Water and Liquid discharges	n° 15-09 précitée	Hijri: 3 kaada 1446   2025-05-01				
			National	Water and Liquid discharges	précitée	Hijri: 8 hija 1446   2025-06-05				
			National	Water and Liquid discharges	n° 03-12 précitée	Hijri: 13 safar 1447   2025-08-07				
			National	Water and Liquid discharges	, modifiant et complétant la	Hijri: 3 kaada 1446   2025-05-01				

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