

NTRRPA/AI GEN AI STRATEGY

Strategic Compliance Roadmap

Oil Blending & Transportation Operations

Meeting UAE & Saudi Arabia Emissions Standards by End-2026

NTRRPA/AI GEN AI STRATEGY

Model the shift in oil movement priorities toward low-carbon blends, predicting volume changes due to CCUS hub developments in Jubail and Habshan over the next 18 months."

Executive Summary

30 May

UAE Hard Deadline

~23%

Avg Readiness

\$18M+

Total Risk Exposure

3

Agile Phases

The UAE Federal Climate Law (Decree-Law No. 11/2024) requires full compliance by 30 May 2026 — just over 3 months away. All entities must measure, report, and reduce Scope 1 & 2 GHG emissions with third-party verification.

Saudi Arabia's framework targets zero routine flaring, 30% methane reduction by 2030, and aligns with the Global Methane Pledge. EU CBAM certificates are live from Jan 2026, creating additional cost pressure on exports.

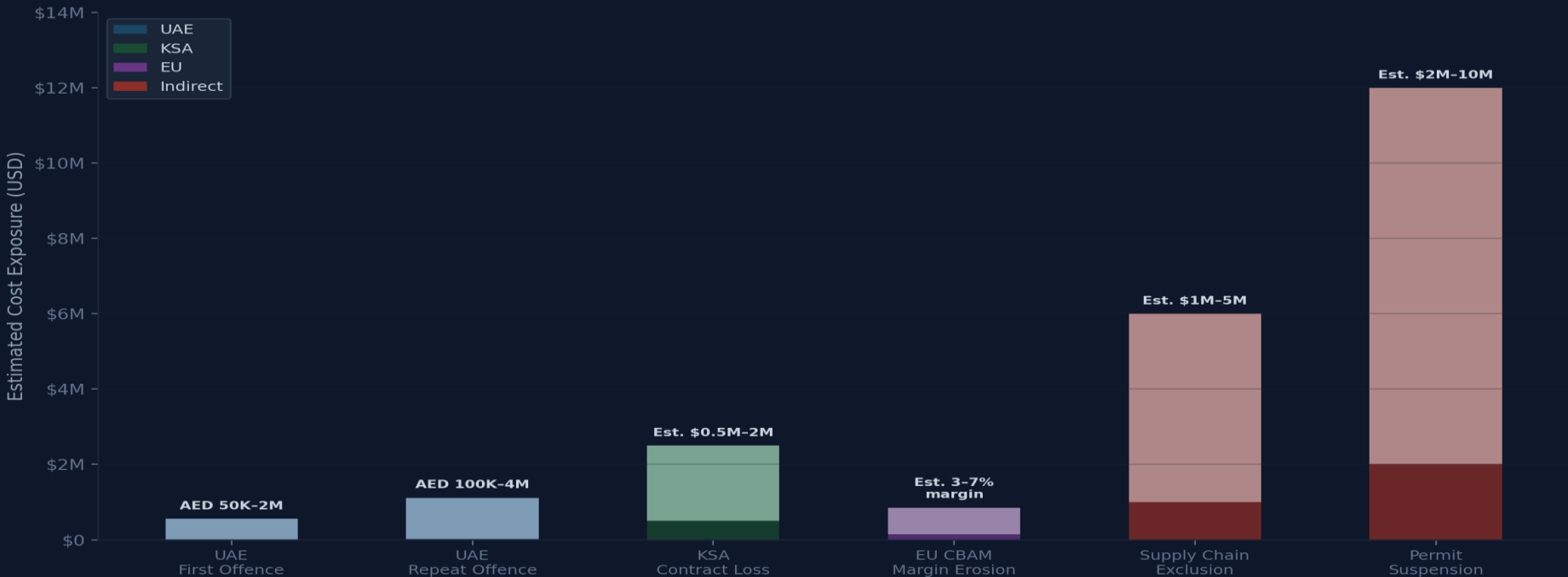
This roadmap uses an Agile delivery framework across three phases to address compliance gaps in oil blending and transportation operations.

Non-Compliance Cost Exposure

Estimated financial impact range (USD) across UAE, KSA, EU & indirect costs

Non-Compliance Cost Exposure

Estimated financial impact range (USD) — UAE Climate Law, KSA standards & indirect costs



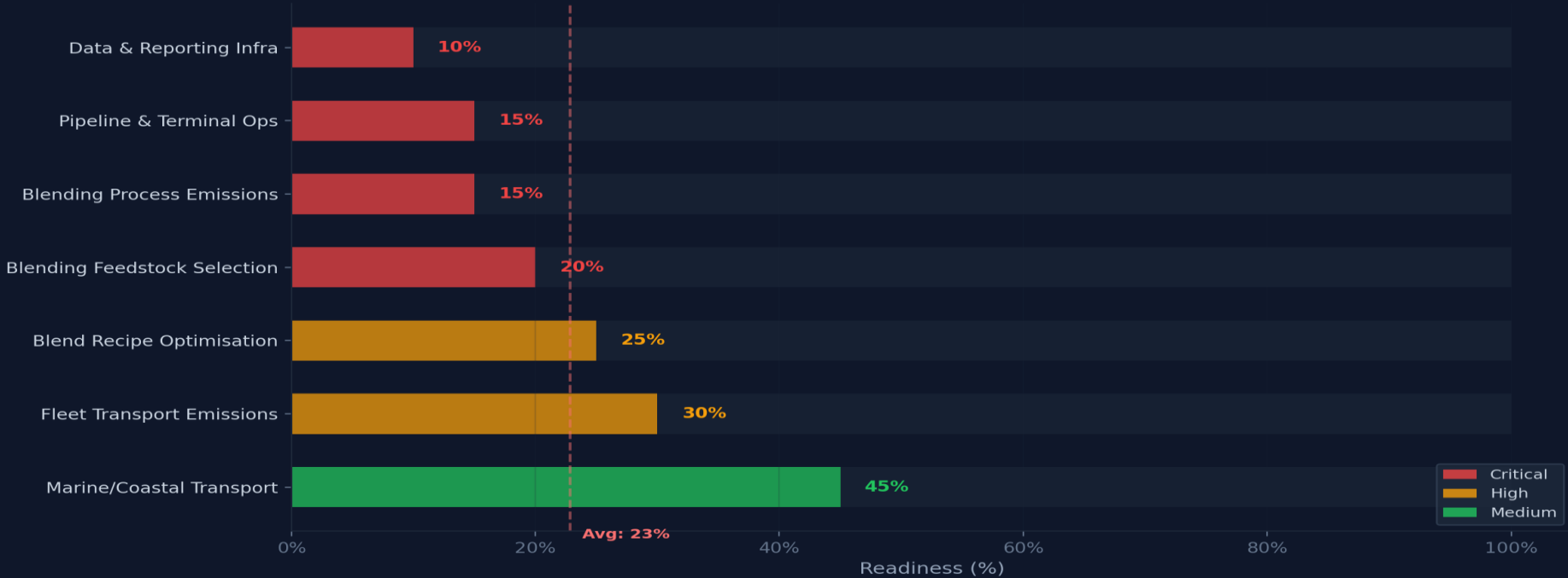
⚠ Indirect costs (supply chain exclusion, permit suspension) dwarf direct regulatory fines. Total exposure across all categories could exceed \$18M.

Compliance Readiness by Operational Area

Current readiness (%) against UAE & Saudi frameworks — Deadline: 30 May 2026

Compliance Readiness by Operational Area

Current readiness (%) against UAE Climate Law & Saudi emissions framework — Deadline: 30 May 2026



▲ Data & Reporting Infrastructure scores lowest at 10% — this is the foundation for all other compliance areas. Prioritise in Sprint 1.

Risk Assessment Matrix

Likelihood × Impact scoring — 6 risks identified, 5 rated Critical or High

Risk Assessment Matrix

Likelihood × Impact scoring for compliance programme risks



RISK REGISTER

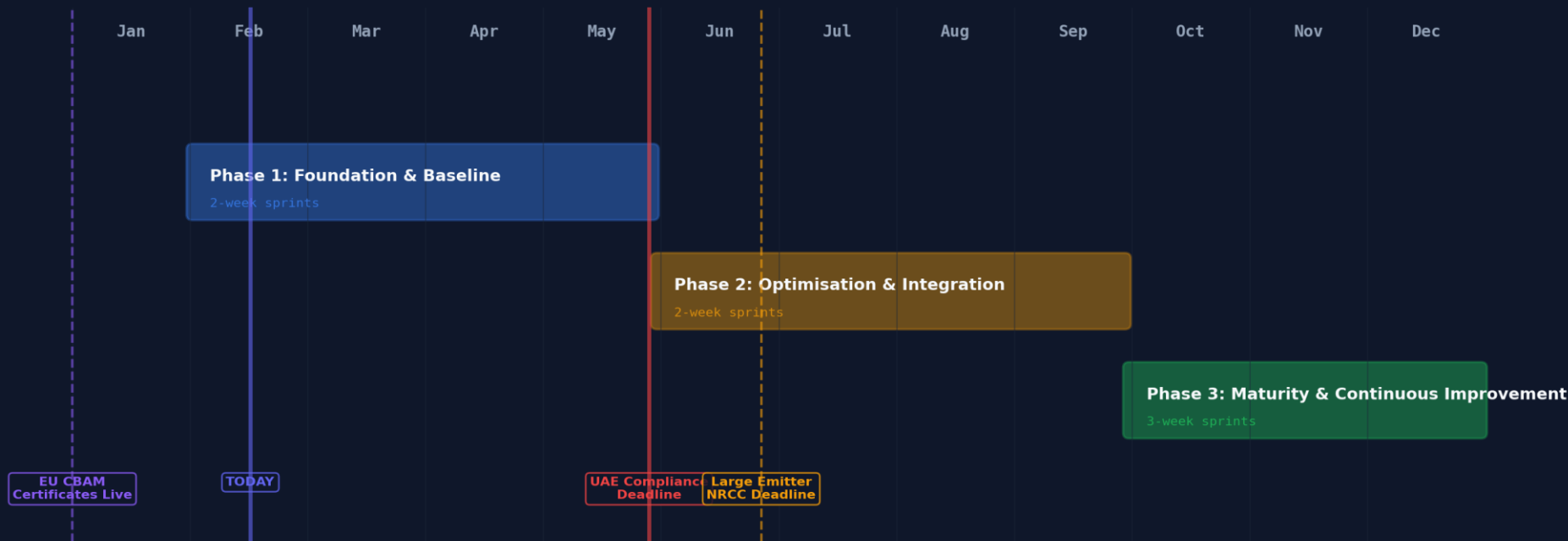
- 1 UAE regulations issued late**
Regulatory | Critical
→ Agile backlog reprioritisation; flexible data schemas
4×4=16
- 2 Saudi targets more stringent**
Regulatory | Critical
→ Design systems to exceed known baselines by 15-20%
3×4=12
- 3 CEMS/IoT deployment delays**
Operational | High
→ Phase deployment; use interim estimation methods
3×3=9
- 4 Third-party verifiers unavailable**
Compliance | Critical
→ Engage verifiers early Q1 2026; multiple providers
3×4=12
- 5 EU CBAM pricing higher**
Financial | Critical
→ Build pricing scenarios into blend optimisation
3×4=12
- 6 Staff skills gap**
Operational | Critical
→ Targeted training Sprint 1; contract specialists
4×3=12

Agile Implementation Roadmap — 2026

Three-phase delivery with sprint cadence, milestones & regulatory deadlines

Agile Implementation Roadmap — 2026

Three-phase delivery timeline with sprint cadence, milestones, and regulatory deadlines



⚠ Critical path: UAE hard compliance deadline of 30 May 2026 falls at the end of Phase 1. Data platform MVP and baseline GHG inventory must be complete before this date.

Key Recommendations

- 1 Treat 30 May 2026 as a hard deadline.** Begin Phase 1 immediately. Register with NRCC if applicable.
- 2 Invest in the data platform first.** Build centralised carbon accounting engine (T-SQL/PL-SQL) as Sprint 1 priority.
- 3 Deploy CEMS at highest-emission sites first.** Top 3–5 facilities likely account for majority of Scope 1 emissions.
- 4 Integrate carbon cost into blend optimisation.** Single highest-impact operational change — every batch decision drives lower emissions.
- 5 Engage third-party verifiers early.** Demand will spike as May 2026 approaches. Secure engagement letters Q1 2026.
- 6 Design for dual jurisdiction.** MRV system must handle UAE prescriptive reporting AND Saudi self-regulation simultaneously.
- 7 Use Agile to absorb regulatory uncertainty.** Both jurisdictions still finalising implementing regulations. Sprints enable pivoting.

Next Steps

Convene a cross-functional sprint planning session within the next two weeks to:

- Finalise the Phase 1 backlog
- Assign product ownership for the compliance programme
- Launch Sprint 1 targeting data platform MVP and CEMS deployment
- Engage accredited third-party verifiers