



**Environmental
Protection
Agency**

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Environmental Permit (Renewed)

Issued under the Environmental Protection Act, Cap. 20:05, Laws of Guyana, the Environmental Protection (Amendment) Act, 2005, and Environmental Protection (Authorisations) Regulations, 2000.

Reference No.:	20170314 – LRAVR
Fees:	Small (C2) - US\$175 per year
Fees Paid:	US\$875 - (5 years – March, 2023 - February, 2028)

Addressee(s): Two (2) Brothers Complex Inc.
Proprietor
17 Vergenogen
East Bank Essequibo.

Activity: Operation of a Rice Mill

Two (2) Brothers Complex Inc., hereinafter referred to as the “Permit Holder”, is hereby authorised in accordance with the Environmental Protection Act, Cap. 20:05, Laws of Guyana, the Environmental Protection (Amendment) Act, 2005, and the Environmental Protection (Authorisations) Regulations, 2000, to operate a Rice Mill, located at 17 Vergenogen, East Bank Essequibo hereinafter referred to as the “Project”, in a manner indicated in the Renewal Application submitted on June 26 2020, and subject to the terms and conditions set forth herein under the Environmental Protection Act, Cap. 20:05, existing and/or forthcoming regulations made under the said Act, and/or any other applicable laws, best practices, guidelines and standards relevant to this project.

This Environmental Permit (Renewed) is issued pursuant to the Environmental Protection (Authorisations) Regulations, 2000.

The Permit Holder, His Servant, Agents and/or Sub-Contractors shall comply with the following Terms and Conditions for the Operation:

1.0 OPERATION

- 1.1 Make an application to the Agency to vary this Permit in instances where it becomes necessary to:
- i. change the construction, operation, structure, or layout of the facility and all associated buildings;
 - ii. change equipment, machine, apparatus, mechanism, system or technology serving the facility;
 - iii. change the position and design of any outlet at the point or points of discharge of effluents; or
 - iv. effect any other change outlined in Regulation 20(3) of the Environmental Protection (Authorisations) Regulations.
- 1.2 Ensure that good house-keeping, sanitary and hygienic practices and the aesthetic quality of the surroundings are maintained at all times.

2.0 EMPLOYEES OCCUPATIONAL SAFETY AND HEALTH

2.1 Adhere to the requirements of the Occupational Safety and Health Act, Cap. 99:01, Laws of Guyana.

- 2.1.1 All employees MUST be equipped with and trained in the use Personal Protective Equipment (PPEs) in accordance with their job specifications.
- 2.1.2 A First Aid kit, equipped in accordance with the Guyana Red Cross Standards must be located onsite at all times.
- 2.1.3 Communication and transportation facilities must be in place to adequately respond in cases of emergencies.
- 2.1.4 Make all employees aware of the conditions of this Environmental Permit and provide training on good environmental management practices inclusive of emergency response.
- 2.1.5 Employees working in confined spaces must successfully complete training to work in confined spaces.
- 2.1.6 Employees and visitors entering the area should at all times, be well protected; ensure that employees are equipped with PPEs corresponding with their activity during operation of the Rice Mill, for example, protective headwear, respirators (e.g., N 95 filters or N 95 masks), safety vests, and safety boots, goggles etc.



- 2.1.7 Ensure that staff performing maintenance functions at heights wears safety lines and harnesses.
- 2.1.8 Practice integrated pest control management and ensure that all pest control applications are conducted either by a Pest Control Operator (PCO) who is registered and certified by Pesticides and Toxic Chemicals Control Board (PTCCB) or an employee of the Rice Mill who is certified by the PTCCB as a Pest Control Operative. If an employee is selected as the Pest Control Operative then the Rice Mill should be licensed to conduct the pest control activity. In the case of an employee as a Pest Control Operative, the following should be adhered to:
 - 2.1.8.1 Ensure the Pest Control Operative is equipped with Personal Protective Equipment (PPE) according to the Safety Data Sheets (SDS) during the mixing and application of pesticide including the spraying and rinsing operations.
 - 2.1.8.2 Use only pesticides, roach, fly, ant and rat baits that are approved for use in Guyana by the Pesticides and Toxic Chemicals Control Board. Pesticides should be mixed in accordance with the pesticides label directions.
- 2.1.9 All employees/third party contractors should be aware of the Conditions of this Environmental Permit and provide training on good environmental management practices.

3.0 WATER QUALITY MANAGEMENT

- 3.1 Comply with the provisions of the **Environmental Protection (Water Quality) Regulations, 2000.**
 - 3.1.1 **The disposal of** paddy husk, paddy ash or any other solid waste into drains and/or surrounding waterways **is strictly prohibited.**
 - 3.1.2 The drainage network in and around the facility must be kept free of debris and/or vegetation.
 - 3.1.3 Promote conservation of water resources by minimizing water consumption in the production processes and reuse water where practicable.

4.0 AIR QUALITY MANAGEMENT

- 4.1 Comply with the provisions of the **Environmental Protection (Air Quality) Regulations, 2000.**



- 4.1.1 Ensure that the exhaust stacks of the generator and dryer are at a height of at least two (2) meters above the tallest building in the surrounding area, so as to effectively disperse exhaust fumes into the atmosphere.
- 4.1.2 With regards to air quality the following should be done:
- 4.2 Comply with the World Health Organisation (WHO) Air Quality Guidelines for Particulate Matter in the Environment, not exceeding the limits below:
 - PM_{2.5}: 10 µg/m³ annual mean
25 µg/m³ 24-hour mean
 - PM₁₀: 20 µg/m³ annual mean
50 µg/m³ 24-hour mean
- 4.2.1 Conduct air quality monitoring at least twice yearly to gather baseline data for ambient conditions as well as conditions during operational phase of the project, during down seasons and once during full operation (milling season). Submit this information in the annual reports.
- 4.2.3 Conduct monitoring of PM 2.5 and PM₁₀ upwind and downwind of the rice mill during one milling season in the first year after this Environmental Permit (Renewed) was issued and submit the results to the Agency in your Annual Report. ***Note that the Agency reserves the right to request additional monitoring upon the review of the results submitted.***
- 4.4 Ensure that complete enclosure of the operation is maintained, i.e., grain receiving and storage area(s), cleaning house(s), mill house and load out area(s), packing and shipping area (s), to minimize the impact of dust and ash on the receiving environment. An adequate and efficient dust/ash collection system with extractor and containment bin(s) with the capacity to store approximately seventy-five percent (75%) of all paddy waste (paddy husks, soot, etc.) shall be installed, until such time for disposal.
- 4.5 Apply wet suppression techniques (where necessary) and erect dust screens/fences to control particulate matter/dust emissions from the facility, from material stockpiles, the paddy husk heap, milling area and other components of the operation that would generate dust.
- 4.6 Ensure that all concrete surfaces are thoroughly swept and all dust collected prior to any wash-down procedure in an effort to minimize the discharge of sediment.
- 4.7 Ensure that staff does not work for prolonged periods in areas where high levels of heat are emitted.



4.8 Open burning of paddy hull onsite is strictly prohibited.

5.0 NOISE MANAGEMENT

5.1 Comply with the provisions of the **Environmental Protection (Noise Management) Regulations, 2000.**

5.1.1 Maintain equipment according to manufacturer's specifications, to ensure that machinery works efficiently with all safeguards and electrical connections required by the manufacturer for safety.

5.2 Comply with the *Guyana National Bureau of Standards (GNBS) Guidelines* for Noise Emissions into the Environment, at a distance of 15 m (50 ft) from the source or at the property boundary, whichever is closer. Residential Limits not exceeding:

75 dB during the day-time (06:00 h - 18:00 h) and
60 B during the night-time (18:00 h - 06:00 h)

5.3 Equip all generators with silencers and/or mufflers, so as to reduce the levels of noise emitted into the environment.

5.4 Operate all sound-making devices (e.g., generators) from within a completely enclosed and properly sound-attenuated room to achieve compliance with Guyana National Bureau of Standards (GNBS) requirements.


6.0 WASTE MANAGEMENT

6.1 Comply with the provisions of the **Environmental Protection (Litter Enforcement) Regulations, 2013.**

6.1.1 Maintain proper solid waste management and disposal practices in the operation. Provide properly covered garbage receptacles both within and outside of the operation.

6.1.2 Dispose any additional unused paddy husk and paddy impurities and any other solid waste at a disposal site approved by the Neighborhood Democratic Council.

6.1.3 Ensure all solid waste materials are reused or recycled. Options for reuse include but are not limited to: bedding for poultry operations; mulching; and landfilling where practical.



- 6.2 Ensure that in event of paddy husk/chaff accumulating on site, the heap shall be kept at 5 feet or less and wet suppression methods shall be used to reduce dust pollution in the transport of paddy chaff to surrounding areas.
- 6.3 Maintain a septic system on site. The septic tank should not be located within 1.5m of a building or property boundary and should be accessible for cleaning and de-sludging. Any modification to the septic tanks must be in accordance with the Guyana National Bureau of Standards (GNBS) Code of Practice for the Design and Construction of Septic Tanks and Associated Secondary Treatment and Disposal Systems.
- 6.4 Label, tile, paint washroom facilities. There should also be running water at all times available to staff working at the facility. Washrooms should always be kept in a tidy manner.

7 FUEL, WASTE OIL, HAZARDOUS MATERIALS MANAGEMENT & ENVIRONMENTAL EMERGENCY

7.1 Comply with the provisions of the Environmental Protection (Hazardous Wastes Management) Regulations, 2000.

- 7.1.1 Store all fuel away from ignition sources and have No smoking signs posted where fuel is handled or store
- 7.1.2 Maintain the fuel containment bund with 100% containment capacity of the largest storage tank, which must have an impervious surface for the handling of all oils, lubricants and fuels. Designate areas for storage and collection of fuel and chemicals.
- 7.1.3 Maintain a supply of relevant oil-absorbent materials such as absorbent pads, sand, etc., at the site for the clean-up of spills. Used adsorbent materials stored and disposed of in a manner approved by the EPA. Used pads can be stored in bonded area until appropriately disposed.
 - 7.1.3.1 Ensure that appropriate clean-up equipment such as spill trays, oil spill clean-up recover pump, oil spill dispersant spray system or absorbent pads are readily accessible during refuelling exercises.
- 7.1.5 Install an oil-water separator at the final discharge point of the bunded area to capture any runoff from that structure.
- 7.1.6 Treat and contain spills of even a minor nature with absorbent materials.



8.0 COMPLIANCE, MONITORING & REPORTING

- 8.1 Notify the Environmental Protection Agency **within one (1) hour** of the occurrence of any environmental emergencies (e.g., oil spills, hazardous materials/wastes spill, sudden onset disaster, natural, technological or human-induced factors that cause or threaten to cause severe environmental damage as well as harm to human health or livelihood).
- 8.2 Monitor the implementation of the conditions of this Permit, insofar as they involve adherence by your employees and all third parties under your direction.
- 8.3 Notify the Agency in writing of any change of name or ownership of the Permit Holder's facility within **thirty (30) days** after the change occurs.
- 8.4 Notify the Agency **within twenty-one (21) days** in event of death, bankruptcy, liquidation or receivership of the Permit Holder or if the Company becomes a party to an amalgamation.
- 8.5 Maintain and submit to the Agency records of the type, composition and quantity of contaminant released (i.e., any solid, liquid, gas, odour, sound, vibration, radiation, heat or combination of any of them).
- 8.6 Submit an **Annual Report** to the EPA on your compliance with this Environmental Permit on or before **March 31, each year**.
- 8.7 Report to the Agency any non-compliance(s) with the Environmental Permit:
 - i. Within **twenty-four (24) hours** of the time the Holder of the Environmental Permit becomes aware of the non-compliance outlining the anticipated manner in which human health or the environment may be impacted.
 - ii. Within **seventy-two (72) hours** of the time the Holder of the Environmental Permit becomes aware of the non-compliance, submit to the Agency a written report containing a description of the non-compliance, its cause, the period of non-compliance including exact dates and time and the anticipated time it is expected to continue if the non-compliance(s) has not been corrected.
- 8.8 Comply with any lawful directions given by the EPA from time-to-time in furtherance of the implementation of any international or other obligation for the environmental protection of Guyana.



9.0 INSTITUTIONAL AUTHORITY AND LIABILITIES

- 9.1 The Permit Holder shall be liable for any material environmental harm caused by polluting the environment, pursuant to s. 39 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana.
- 9.2 The Permit Holder shall be liable for any serious environmental harm caused by polluting the environment, pursuant to s. 39 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana.
- 9.3 The Permit Holder shall be liable for any activity that causes or is likely to cause pollution of the environment unless all reasonable and practicable measures are taken to prevent or minimise any resulting adverse effect, pursuant to s. 19 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana.
- 9.4 The Permit Holder shall be liable for discharging, causing or permitting the entry into the environment, of any contaminant in any amount, concentration or level excess of that prescribed by the regulations or stipulated by this Environmental Permit, pursuant to s. 19 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana.
- 9.5 The Permit Holder shall be liable to compensate any person who suffers any loss or damage as a result of the contravention of the conditions of this Environmental Permit, pursuant to s. 19 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana.
- 9.6 The Permit Holder shall not be indemnified by the Agency for any activity that causes or is likely to cause pollution to the environment, resulting from adverse effects through the discharge, any contaminant in any amount, concentration, ultra-hazardous substances, chemicals or otherwise, and shall be rendered liable to prosecution and to penalties prescribed under the Environmental Protection Act and Regulations.
- 9.7 The Permit Holder shall be liable of any gross negligence or willful misconduct caused by the Permit Holder, his Servants and/or Agents, to the environment, biodiversity, protected species and natural habitat with respect to any release, discharge, or spill, of contaminant fluids, oil or lubricants.
- 9.8 Should the Permit Holder contravene or be likely to contravene any condition of this Permit, the Agency (EPA) may serve on him an Enforcement Notice in accordance with Section 26 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana.
- 9.9 Where it appears to the Agency that the Permit Holder is engaged in any activity that may pose a serious threat to natural resources or the environment, or a risk

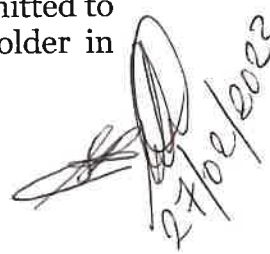


Environmental Permit (renewed) - Ref. No. 20170314 – LRAVR

Issued under the Environmental Protection Act, Cap.20:05, Laws of Guyana, the Environmental Protection (Amendment) Act, 2005, and Environmental Protection (Authorisations) Regulations, 2000.

of serious pollution of the environment or any damage to public health, the EPA may issue to the Permit Holder a Prohibition Notice, which may order him to immediately cease the offending activity, in accordance with Section 27 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana.

- 9.10 The EPA reserves the right to conduct regular inspections of the Permit Holder's activities as part of its monitoring and enforcement requirements under the Environmental Protection Act, Cap 20:05 and its regulations.
- 9.11 The Permit Holder, His Servants and/or Agents shall at all times, allow entry to the permitted facility to any Officer designated by the EPA for the purposes of conducting inspections or any other legitimate business of the Agency. Pursuant to Section 38 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana, it is an offence to assault, obstruct or hinder an authorised person in the execution of his/her duty under the said Act or its Regulations and the Permit Holder shall be liable to penalties prescribed under paragraph (c) of the Fifth Schedule for doing so.
- 9.12 The EPA has the right to modify, cancel or suspend this Permit for breach of any of the terms and conditions contained herein.
- 9.13 **This Environmental Permit (renewed) is not the final consent; all relevant Permissions should be obtained from other regulatory bodies for continued operation.**
- 9.14 This **Environmental Permit (renewed)** is effective for the period stipulated herein, **March, 2023 to February, 2028.**
- 9.15 This **Environmental Permit (renewed)** shall remain valid until **February 28 2028**, unless otherwise suspended, cancelled, modified or varied, in accordance with the provisions of this Permit or the Environmental Protection Act, Cap. 20:05, Laws of Guyana and the Environmental Protection (Authorisations) Regulations, 2000.
- 9.16 This **Environmental Permit (renewed)** must be renewed by submitting a completed *Application Form for Renewal of Environmental Authorisation* to the Agency at least six (6) months before this Permit expires, that is, no later than **September 30, 2027.**
- 9.17 Any late submission of renewal application after the specified date as stated above, the agency may require the Permit Holder to pay, in addition to the renewal fee, a late penalty fee (accruing at the time such obligation was first owed for renewal) at a rate of **two thousand dollars (\$2,000.00) per day for every business day late**, until such renewal application is submitted to the Agency, without prejudice to any other rights of the Permit Holder in





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connection therewith.

- 9.18 Failure to comply with the requirements of this Permit or with applicable laws and regulations, whether existing or forthcoming, shall render the Permit Holder liable to prosecution and to penalties, inclusive of civil penalties, injunctive relief and imprisonment, as prescribed under the Environmental Protection Act, Cap. 20:05, Laws of Guyana, the Environmental Protection Regulations and any other applicable Laws of Guyana.

Signed by Shamirh Ragack on behalf of the Environmental Protection Agency.


for **Kemraj Parsram**
Executive Director

Date 2023. 01.27

I hereby accept the above Terms and Conditions upon which this Environmental Permit (renewed) is granted and agree to abide by the Environmental Protection Act, Cap. 20:05, Laws of Guyana, the Environmental Protection (Amendment) Act, 2005, the Environmental Protection Regulations, 2000, and any forthcoming regulations, best practices, guidelines and standards made under this Act.

NAME:	
<u>WOODSWORTH WILLIAMS</u>	
DESIGNATION:	
<u>REP 2 BROTHERS</u>	
SIGNATURE:	
	
DATE:	
<u>27/02/2023</u>	

