

# EDUN'S POULTRY FARMS

## ADDENDUM ENVIRONMENTAL MANAGEMENT PLAN



**May 2021**

Prepared by:  
Environmental Management Consultants



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## ACRONYMS

EMC	Environmental Management Consultants
EMP	Environmental Management Plan
EPA	Environmental Protection Agency
TSS	Total Suspended Solids

## 1.0 INTRODUCTION

Edun's Poultry Farms was established at Garden of Eden, East Bank Demerara in 2000 with a focus on the production of eggs for the local market. The farm is supported by a hatchery and poultry feed mill located at Craig, East Bank Demerara.

Edun's Poultry Farms was granted Environmental Authorisation by the Environmental Protection Agency (EPA) in 2001. This Permit (Ref # 20011102-EDUNP) expired in 2004. In 2018, Edun's Poultry Farm engaged the EPA and submitted an Application for Environmental Authorisation. The EPA determined that it will consider the application as a request for the renewal of the expired Permit and prior to the renewal of the Permit, Edun's Poultry Farms would be required to prepare and submit to the Agency for review and approval an Environmental Management Plan (EMP). This requirement was communicated through a letter from the EPA dated June 27, 2019. A copy of this letter is attached as Appendix A.

In keeping with this requirement, a draft EMP was prepared by the Company through its consultants Environmental Management Consultants Inc. (EMC) and was submitted to the EPA for review in November 2020. In April 2021 the Company received comments from the EPA on the draft EMP. The Agency requested that the comments be addressed through the submission of an Addendum to the EMP. A copy of the correspondence and comments are attached as Appendix A.

This Addendum to the EMP has been prepared for submission to the EPA and addresses the comments provided along with additional information requested. The responses and/or the additional information are presented under each comment by the Agency.

## 2.0 RESPONSES/ADDITIONAL INFORMATION

Outlined below are the additional information requested by the Agency, or responses to the comments provided.

### 2.1 Section 4.1.2

#### ***EPA Comment***

Pages 38 (images of silted-up internal drains) and 62 - Section 5.2.1.3 - Recommended Mitigation and Management Measures, first bullet indicated that "drains will be cleared of silt and vegetation....."

What is the expected timeline for completion of this activity? A cleaning schedule should be included.

#### ***Response/ Additional Information***

The drains will be cleaned by May 30, 2021 and thereafter once per production prior to scheduled wash-downs of the manual houses. However, it should be noted that the drains located along the sides of the manual production houses will no longer be used when the automated production house is fully operational (see response below).

### 2.2 Section 5.2.2.1

#### ***EPA Comment***

Page 63 - Section 5.2.2.1 Surface Water, 3<sup>rd</sup> paragraph "When the expansion process is completed and all production houses transition to an automated system, no effluent will be discharged from the production section as the automated production houses will be cleaned by disinfectant mist". What is the expected timeline for completion of this expansion process? In the interim, what measures will be implemented to reduce the high levels of Total Iron, Total Suspended Solids and Turbidity?

#### ***Response/ Additional Information***

The second automated production house is already being used but not at full capacity. Full operationalization has been delayed due to the COVID-19 pandemic. The technicians who are needed to complete the installation of the automated equipment have to travel from Brazil. If there were no delays associated with the COVID-19 pandemic the second automated production house would have been already been fully operational.

As discussed in the EMP, the wastewater characterization with elevated levels of Total Iron, Total Suspended Solids (TSS) and Turbidity were not associated with effluent discharge from the operations since no animal excreta or other wastes are directly released into the internal drainage system. The elevated levels of Turbidity, TSS and Iron can be attributed to seasonal fluxes as a result of heavy rainfall which preceded and occurred during the sampling exercise. The levels recorded in the water quality analysis are expected due to sedimentation from increased surface runoff from the earthen banks.

## 2.3 Section 5.2.6

### ***EPA comment***

Page 68 - Section 5.2.6 Waste Management, there was no mention of broken and spoilt eggs under this section. Information on the quantity of broken and spoilt eggs collected at the end of the production cycle, as well as, the disposal method(s) should be indicated.

### ***Response/ Additional Information***

Eggs are packaged for delivery on a daily basis and as such spoilage is not an issue encountered by the operation.

However, eggs with cracks on the shells are set aside for donation on a daily basis to a pig farmer who operates within proximity to Edun's Poultry Farms and who visits in the evenings to collect the discarded eggs.

## 2.4 Section 5.2.6.2

### ***EPA comment***

Page 69 - 5.2.6.2 Mitigation and Mitigation Measures,

- 1) First bullet indicated that "Arrangements should be put in place to collect packaging wastes inclusive of large cardboard boxes and damaged paper egg trays by the third-party contractor for disposal at Haags Bosch Landfill Site".  
When will this arrangement be finalized and which waste disposal company will be contracted to collect the waste?
- 2) Second bullet stated that "Used fuel/oil filters should be drained before being disposed with general solid waste". Please explain how the used fuel/ oil filters will be drained as well as the storage and disposal of the residual oils.

### ***Response/ Additional Information***

#### Mitigation and Management Measures:

1. All general solid wastes generated on-site are consolidated for collection by Puran's Brothers Inc. for disposal at the Haags Bosch Landfill Site.
2. A rack to facilitate drainage of used fuel/oil filters and used oily rags prior to disposal has been set-up in a designated section of the generator room.



## Appendix A – EPA Correspondence on Draft EMP



### Government of the Co-operative Republic of Guyana Environmental Protection Agency



March 22, 2021

Reference No.: 20011102 – EDUNP

**Mr. Mohamed Saeed Edun**  
**Proprietor**  
**Edun's Poultry Farms & Hatchery**  
24-25, Buzz Bee Dam, Craig  
East Bank Demerara.



Dear Mr. Edun,

**Re: Comments on Environmental Management Plan (EMP) for Edun's Poultry Farms**

The Environmental Protection Agency (EPA) acknowledges receipt of Environmental Management Plan (EMP), submitted on November 19, 2020. The Agency has completed its review of the EMP and the following comments/questions, attached herein, should be fully addressed and resubmitted in an Addendum for approval by the Agency, **on or before April 16, 2021.**

Should you have any questions or need clarification, please do not hesitate to make contact with **Mr. Ronn Sullivan, Senior Environmental Officer, Agriculture and Forestry Department** on telephone number 225- 5472 (Ext 2343) or email [rsullivan@epaguyana.org](mailto:rsullivan@epaguyana.org).

Yours Sincerely,

.....  
**Mr. Imole Mc Donald**  
**Head**  
**Forestry & Agriculture**

Attach: Comments/questions regarding EMP

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Government of the Co-operative Republic of Guyana  
Environmental Protection Agency



Attached:

*Comments/questions regarding EMP to be addressed in Addendum.*

- I. Pages 38 (images of silted-up internal drains) and 62 -section 5.2.1.3 – Recommended Mitigation and Management Measures, first bullet indicated that “drains will be cleared of silt and vegetation.....” What is the expected timeline for completion of this activity? A cleaning schedule should be included
- II. Page 63-section-5.2.2.1 Surface Water, 3<sup>rd</sup> paragraph “When the expansion process is completed and all production houses transition to an automated system, no effluent will be discharged from the production section as the automated production houses will be cleaned by disinfectant mist”. What is the expected timeline for completion of this expansion process? In the interim, what measures will be implemented to reduce the high levels of Total Iron, TSS and Turbidity?
- III. Page 68, section- 5.2.6 Waste Management, there was no mention of broken and spoilt eggs under this section. Information on the quantity of broken and spoilt eggs collected at the end of the production cycle, as well as, the disposal method (s) should be indicated.
- IV. Page 69, 5.2.6.2 Mitigation and Mitigation Measures,
  - i) First bullet indicated that “Arrangements should be put in place to collect packaging wastes inclusive of large cardboard boxes and damaged paper egg trays by the third party contractor for disposal at Haags Bosch Landfill Site”. When will this arrangement be finalized and which waste disposal company will be contracted to collect the waste?
  - ii) Second bullet stated that “Used fuel/oil filters should be drained before being disposed with general solid waste”. Please explain how the used fuel/oil filters will be drained as well as the storage and disposal of the residual oils.

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