



**Environmental  
Protection  
Agency**

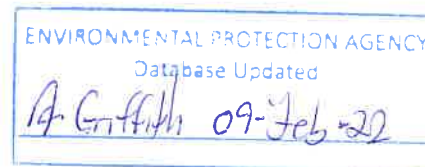
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## **Environmental Permit**

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

Reference No.:	20180403 - RLSLS
Fees:	ExtraLarge (C2) US\$15,500 five (5) years) i.e., US\$3,100 per year
Fees Paid:	US\$ 15,500 (January 2022 to December 2026)

**Addressee(s):** Mr. Ragunauth Lall Sukhram  
Chief Executive Officer  
R.L. Sukhram & Sons  
Lots 6 & 7, St. Lawrence  
East Bank Essequibo.



**Activity:** To undertake Logging and Sawmilling Activities within SFEP 02/2017

Mr. Ragunauth Lall Sukhram, trading and operating under the name R.L. Sukhram & Sons, 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 undertake logging and sawmilling activities located within SFEP 02/2017, located at Left Bank Puruni River, Right Bank Cuyuni River, Kartabu Triangle, hereinafter referred to as the "Project", in a manner indicated in the Application submitted on April 03, 2018, and subject to the terms and conditions set forth herein under the Environmental Protection Act, 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.

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

### **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

D.S. 17 Jan 2022

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**Environmental Permit - Ref. No.: 20180403-RLSLS**

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- iv. effect any other change outlined in Regulation 20(3) of the Environmental Protection (Authorisations) Regulations.
- 1.2 **Engage with the community of Kurutuku within three (3) months of the issuance of the Permit, presenting the project and identifying any issues/concerns. Submit to the Agency a report outlining the issues/concerns raised and how these will be addressed by the Company.**
- 1.3 Submit to the Agency the Shape file (.shp) for the concession **within six weeks** of the issuance of this Permit.
- 1.4 Be obligated to restore or rehabilitate the Environment due to impacts resulting from any breach of the conditions of this Permit.
- 1.5 Construct camps, roads, log markets, plumbed toilets/pit latrines and trail(s) in the manner specified in the Guyana Forestry Commission (GFC) Guidelines for Forest Operations, 2018.
- 1.6 Ensure that logs do not free fall from log haulers to the ground to aid in the attenuation of vibrations and reduce the incidence of accidents.

## **2.0 EMPLOYEES**

- 2.1 Adhere to the requirements of the **Occupational Safety and Health Act, Cap. 99:01, Laws of Guyana.**
- 2.2 Employ an Environmental Officer or utilize the Company's Health and Safety Officer/ Committee to:
  - 2.2.1 Be responsible for the implementation of Environmental and Social Impact Assessment (ESIA).
  - 2.2.2 Make aware all employees/third party contractors of the conditions of the Environmental Permit, and
  - 2.2.3 Provide training on good environmental management practices.

## **3.0 WASTE MANAGEMENT**

- 3.1 **Comply with the provisions of the Environmental Protection (Litter Enforcement) Regulations, 2013, where applicable.**
- 3.2 Maintain good housekeeping, sanitary, hygienic practices, and the aesthetic quality of all operational facilities and surroundings.
- 3.3 Promote proper solid waste management and disposal practices on site. Including but not limited to:
  - 3.3.1 Placing covered garbage receptacles at strategic locations both in and

D.S 19 Jan 2022

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**Environmental Permit - Ref. No.: 20180403-RLSLS**

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- outside of camps;
- 3.3.2 Ensuring that all solid waste collected is appropriately stored until such time for disposal in solid waste pits; and
- 3.3.3 Reusing, recycling and composting waste material as much as practicable.
- 3.4 Solid Waste Pits shall be located at least 100 metres away from waterways, above the water table and lined with at least 1.5 metres of clay/loam material to avoid leachate entering the ground water. Additionally:
  - 3.4.1 Storm water shall be diverted from the solid waste pits. Pits shall be maintained and covered on a regular basis to minimise insect and rodent infestations, as well as mal-odour from leachate.
  - 3.4.2 When the maximum capacity is reached, solid waste pits shall be capped with at least 0.3 metres of clay/loam and a suitable site determined for another.
- 3.5 In event that sawdust, wood shaving and wood ends accumulate site. They must be stored in a designated area, in heaps, not exceeding two (2) metres. Options for reuse include but not limited to those identified below:
  - 3.5.1 Mulching
  - 3.5.2 Landfilling, where practical.

#### **4.0 HAZARDOUS MATERIALS**

- 4.1 **Adhere to the provisions of the Environmental Protection (Hazardous Wastes Management) Regulations, 2000.**
- 4.2 There shall be no release of any pollutants (i.e., fuel, waste oil, wood preservatives) to ground water or soil from permitted installation. Please note:
  - 4.2.1 An incident spill report shall document **EVERY** occurrence of spills during collection and/or transportation of hazardous waste. A copy of the spill report shall be submitted to the Agency **within twenty-four (24) hours of the incident.**
- 4.3 Store all fuel away from ignition sources and have '**No Smoking**' signs posted where fuel is handled or stored.
- 4.4 Waste oils, used batteries, oily rags, and oil containers shall be appropriately labelled and stored in tightly covered drums or barrels to avoid spillage. Waste oils and used batteries shall be reused for example, for lubrication of equipment or sold to an authorised dealer.
- 4.5 Construct a fuel containment bund for the fuel storage tank. The containment bund must have the capacity to store 110 percent of the volume of fuel stored in the tank.
- 4.6 Store all used/waste oil used as preservatives at least 100 metres away from all

D. S 19 Jan 2022

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water courses. It is an offence to drain fuel/lubricants including waste oils of any quantity from equipment onto the ground, or in water ways.

- 4.7 Use leak-proof and tightly closed containers during the transport of fuels to the logging concession and take precautions during handling and use of all hazardous waste.
- 4.8 Where applicable, prepare and submit to the Agency no later than **forty-five (45) days** after the end of the operating year, a report relating to the activities for the previous year. The report shall include:
- a) The identification information of the facility.
  - b) Type and quantities of hazardous waste generated.
  - c) Data concerning off-site shipments of waste.
  - d) Any applied treatment standards.
  - e) A summary of any accidents that may have occurred and any action taken.
  - f) Any waste minimisation efforts undertaken by the generator.
  - g) Any other matter the Agency may require.

The Agency considers all materials listed in **Schedules I and II of the Environmental Protection (Hazardous Waste Management) Regulations, 2000**, to be hazardous. Please see attached list of Hazardous Wastes to be controlled.

## **5.0 AIR QUALITY AND NOISE MANAGEMENT**

- 5.1 **Adhere to the Environmental Protection (Air Quality) Regulations, 2000 and the Environmental Protection (Noise Management) Regulations, 2000.**
- 5.2 Maintain all equipment, machinery and vehicles in accordance with manufacturer's instructions to maintain optimal performance and reduce emissions.
- 5.3 Monitor noise emissions from noise producing equipment onsite to determine compliance with the Guyana National Bureau of Standards (GNBS) Guidelines for noise emission into the environment, not exceeding the limits below at a distance of 15m (50 ft) from the source.
- **Industrial Limits 100dB** (Daytime Limits 06:00 h - 18:00 h)  
**80 dB** (Nighttime Limits 18:00 h - 06:00 h)
- 5.7 Maintain an inventory of all sound making devices/ equipment and sources of air emissions. Inventory shall be made available to the Agency upon request.

- 5.8 Enclose all sound-making devices, e.g., generators, etc. in structures constructed with materials of good noise insulation properties (e.g. concrete blocks, insulation boards, solid clay bricks) and equip with silencers or mufflers to reduce the noise level.
- 5.9 Ensure all equipment and machinery are placed on foundations properly designed to ensure effective damping of vibrations.

## **6.0 BIODIVERSITY MANAGEMENT**

- 6.1 The Permit Holder shall ensure that rare and endangered species are monitored and sustainably managed.
- 6.2 The Permit Holder shall ensure all persons/researchers entering the area to undertake inventories and other studies/research, with the exception of timber inventories, obtain a valid Biodiversity Research Permit from the Agency prior to commencing research.
- 6.3 Maintain the integrity of the biodiversity reserve, monitor and report all activities inclusive of mining within same.
- 6.4 Report to the EPA and the Guyana Wildlife Conservation and Management Commission all occurrences of illegal wildlife trapping & trading. The Permit Holder shall discourage hunting of wildlife by staff.

## **7.0 COMPLIANCE, MONITORING& REPORTING**

- 7.1 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).
- 7.2 Monitor the implementation of the conditions of this Permit, insofar as they involve adherence by your employees and all third parties under your direction.
- 7.3 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.
- 7.4 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.



**Environmental Permit - Ref. No.: 20180403-RLSLS**

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- 7.5 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).
- 7.6 Submit an **Annual Report** to the EPA on your compliance with this Environmental Permit on or before **March 31, each year**.
- 7.7 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.
- 7.8 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.
- 7.9 Inform the National Trust and Walter Roth Museum if any artefacts of archaeological and anthropological significance are unearthed during R.L. Suhkram & Sons' operations.

**8.0 INSTITUTIONAL AUTHORITY AND LIABILITIES**

- 8.1 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.
- 8.2 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.
- 8.3 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.
- 8.4 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

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- 8.5 The Permit Holder shall be liable to compensate any person who suffers any loss or damage as a result of contravening conditions of this Environmental Permit, pursuant to s. 19 of the Environmental Protection Act, Cap. 20:05, Laws of Guyana.
- 8.6 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.
- 8.7 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.
- 8.8 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.
- 8.9 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 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.
- 8.10 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, the Environmental Protection (Amendment) Act, 2005, and Environmental Protection (Authorisations) Regulations, 2000.
- 8.11 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.
- 8.12 The EPA has the right to modify, cancel or suspend this Permit for breach of any of the terms and conditions contained herein.
- 8.13 **This Environmental Permit is not the final consent; all relevant**

**Permissions should be obtained from other regulatory bodies for continued operation.**

- 8.14 This **Environmental Permit** is effective for the period stipulated herein, **January 2022 to December 2026.**
- 8.15 This **Environmental Permit** shall remain valid until **December 31, 2026**, 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.
- 8.16 This **Environmental Permit** 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 **June 30, 2026.**
- 8.17 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 connection therewith.
- 8.18 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 other applicable Laws of Guyana.

Signed by

  
**Kemraj Parsram**  
**Executive Director**

on behalf of the Environmental Protection Agency.

Date 18.1.2022



**Environmental Permit - Ref. No.: 20180403-RLSLS**

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I hereby accept the above Terms and Conditions upon which this Environmental Permit 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:	Devendra Sukhram for R. L. Sukhram
DESIGNATION:	Son
SIGNATURE:	D. Sukhram
DATE:	19 Jan 2022

