

Environmental Assessment Board

C/o The Environmental Protection Agency
Ganges Street, Sophia,
Georgetown

July 1, 2025

Mr. Kemraj Parsram
Executive Director
Environmental Protection Agency
Ganges Street, Sophia,
Georgetown

Dear Executive Director,

**DECISION OF MAKPAK INC. – MANUFACTURING OF PLASTIC PRODUCTS
AT PLOT 60 – AREA “KK” LAND OF CANAAN, EAST BANK DEMERARA**

BACKGROUND

The Environmental Protection Agency (hereinafter the “EPA”) under Sec. 11(2)(a) of the Environmental Protection Act, Cap. 20:05, Laws of Guyana (hereinafter the “Act”) in September 2024, published its decision with reasons to exempt the proposed project – MAKPAK Inc – Manufacturing of Plastic Products (hereinafter the “project”), from the requirement for an Environmental Impact Assessment (hereinafter the “EIA”).

The Environmental Assessment Board (hereinafter referred to as the “EAB”) received an appeal dated October 17, 2024, under Sec. 11(3) of the Act, within the statutory timeline of thirty (30) days of the date of publication of the Agency’s decision. The EAB, in compliance with Sec. 18 of the Act and Sec. 6 of the Third Schedule of the Act, published a fourteen (14) day notice on May 12, 2025, for a public hearing.

The EAB convened a public hearing under Sec. 18(2) of the Act, on the 28th day of May 2025. All parties were heard in person and included an oral presentation from the Appellant, the Developer, and the EPA under Sec. 6 of the Third Schedule of the Act.

The Appellant’s presentations were generally in keeping with their written submissions. From the oral and written presentations, the Appellant identified legal and technical areas with which they were concerned and which served as the basis for their appeal to the EPA’s decision to waive an EIA for the said project.

The project application was made by MAKPAK Inc. (hereinafter the “Developer”), a duly registered company per the Companies Act, Cap. 89:01, Laws of Guyana, which is privately owned and operated.

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The Developer provided an overview of the proposed project, which involves the injection molding of plastic products, including bottle caps, food containers, and medical trays, using polyethylene (PE), polypropylene (PP), and polystyrene (PS) resins, being conducted in a fully enclosed facility, that would be a ventilated structure that utilize closed-loop molding technology. The Developer further focuses on the economic benefits, the application timeline, the material to be utilized, the (international) standards they intend to conform to, and some potential impacts on the surrounding environment. The potential impacts on the surrounding environment that were highlighted include noise emission (cumulative effect from equipment, primarily the generator) and air emission. The Developer also outlined the project's proposed location.

The EPA presented its legal mandate under Sec. 4 and 11 of the Act, which authorized it to assess and waive an EIA for any development activities listed in the Fourth Schedule of the Act or any other activities which may significantly affect the environment. Their presentation also provided a background of the project, an overview of the screening process results. And the key reasons for the decision to waive the EIA.

The EAB examined all information presented on the project, including submissions made at the public hearing concerning the EPA's decision to waive the requirement for an EIA for the Manufacturing of Plastic Products and all additional documents submitted.

The EAB noted the objections raised by the Appellant and made the following observations regarding the key technical concerns: -

1. Air Emissions and Use of Chemicals during Operation

The Board considered the appellant's concerns about polymer toxicity, additives, and emissions of volatile organic compounds (VOCs). However, EPA's monitoring data indicated that total VOCs, formaldehyde, and other relevant compounds were undetectable during operational testing. The manufacturing process, as described, does not involve solvents or chemical reactions, and the thermoplastics in use (PE, PP, and PS) are common materials with established industrial safety profiles. The injection molding process is enclosed and supported by ventilation and extractor systems.

2. Noise Pollution

The Board reviewed EPA's site measurements, which showed that noise levels at residential boundaries (including the appellant's property) were below the GNBS's daytime limit of 75 dB, with average levels between 60 and 65 dB. The highest levels were recorded immediately downwind of the diesel generator, but not at any identified receptor points. The generator was reported to be enclosed, mounted on a sound-dampening base, and operated only during daytime hours.

3. Waste Management and Drainage

The Board reviewed the oral presentation and all additional documents submitted, noting that the project would generate a minor volume of solid plastic waste (i.e., sprues from the molding process), which the Developer intends to reuse or recycle. There are no liquid discharges, effluent lines, or reports of chemical storage that would raise concern under the Environmental Protection Act. While the appellant cited drainage obstruction and sand dumping, these were found to fall primarily under the purview of the local Neighbourhood Democratic Council (NDC). The EPA's inspections did not reveal any ongoing environmental harm or sedimentation risk attributable to the Developer. Additionally, the Developer's intent is to recycle and reuse any waste material generated from the molding process.

4. Public Safety and Health Risks

The appellant further raised concerns about fire hazards and historical examples of catastrophic plastic factory accidents. However, the Board found that the MAKPAK project, due to its scale, materials, and technological setup, does not present the same risk profile as the large-scale operations cited in the appeal. There is no evidence that flammable solvents, volatile reactants, or pressurized systems are involved in the process. Nevertheless, the Board noted that even low-risk operations should maintain a minimum level of fire safety preparedness.

5. Accuracy of the Application (location)

The Board, in further addressing the appellant's claim of misleading or inaccurate information, particularly concerning the distances between the project site and nearby residences, places of worship, and other land uses, noted that the EPA's independent site inspection verified the presence of nearby receptors and accounted for them in its assessment. While some distances may have been misstated in the original application, these inaccuracies did not materially

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affect the EPA's screening determination or the applied mitigation measures.

6. Lack of Access to Information

During this appeal, concerns were raised regarding the EPA's compliance with Sec 36 of the Act, which mandates timely public access to the environmental register. Sec 36(1) of the Act requires the Agency to maintain a register of each application for environmental authorization, including supporting documentation, while subsections (4) and (5) stipulate that these records must be available for public inspection during working hours and that copies may be obtained upon request. The appellant reported that during a visit to the EPA on 30 September 2024, only partial access was granted, while key documents, such as the site map, building plans, and operation layout, were unavailable despite being referenced in the application. The EAB emphasizes that transparency and access to environmental information are essential, especially for projects located near residential areas. While the Board recognizes that all information under Sec. 36 of the Act was provided in conjunction with Sec 11(1) of the Act, the EPA must communicate effectively what information the Appellant is entitled to and provide such promptly.

DECISION OF THE EAB

The Board maintains/supports the decision made by the EPA to exempt the MAKPAK Inc. project from the requirement to conduct an Environmental Impact Assessment (EIA), and recommends the following conditions to support the operations by MAKPAK Inc.;

1. Noise pollution

The EAB notes the proposal by the developer to use noise reduction enclosure to further reduce noise emanating from the facility.

2. Project Site Access

Access to the project site must match the site map/application documents submitted by MAKPAK Inc.

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Should you have any questions, or require further clarifications, please do not hesitate to contact the members of the Board.

Yours sincerely,



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Secretary
Environmental Assessment Board

