



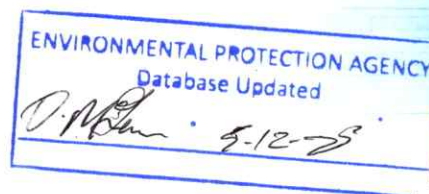
Environmental Protection Agency

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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 Regulations, 2000.

Reference No.:	20190111-SZGMB
Fee:	Extra Large (C2) - US\$ 3,100 per year
Fee Paid:	US\$15,500: Five (5) Years (July, 2021 to June, 2026)
Address:	Mr. Jason Wang, General Manager, Guyana Manganese Inc. 203, Lance Gibbs Street, Georgetown.
Activity:	Manganese Mining and Processing



Guyana Manganese Inc., hereinafter referred to as the “Permit Holder”, is hereby authorised in accordance with the Environmental Protection Act, No. Cap. 20:05, the Environmental Protection (Amendment) Act, 2005, and the Environmental Protection Regulations, 2000, to undertake Manganese Mining and Processing, located at Matthew’s Ridge, North West District, Region No. 01, hereinafter referred to as the “Project”, in a manner indicated in the Application submitted on January 11, 2019, and the Environmental Impact Assessment (EIA) dated April, 2021, 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 Environmental Protection 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 for the Operation:

1.0 OPERATION

- 1.1. Notify the Agency in writing and obtain approval for **ANY** proposed changes in the Manganese Mining/processing Operation, at least **fourteen (14) days** before making the change. The notification shall contain a **description of the proposed change in operation**. It is not necessary to make such a notification if an **Application to vary** this Permit has been made and the Application contains a description of the proposed change. In this condition ‘**change in operation**’ means a change in the nature or functioning, or an extension, of the installation, which may have consequences for the environment, including but

not limited to the following:

- i) Changes in construction, structure, layout of the facility;
- ii) Installation of new and/or changes to equipment, machine, apparatus, mechanism, system or technology serving the facility or operation; and
- iii) Any technology installed at the facility from which effluent may be discharged.

- 1.2 Ensure mining activities do not occur outside the boundaries of **PL 2/15/2010/**, **PL 3/16/2010** outlined as: **Point A**, located at geographical coordinates of longitude 60°9'44"W and latitude 7°32'9"N, thence at true bearing of 180°, for a distance of approximately 3 miles 394 yards, to **Point B**, located at geographical coordinates of longitude 60°9'44"W and latitude 7°29'21"N, thence at true bearing of 263°, for a distance of approximately 2 miles 1370 yards, to **Point C**, located at geographical coordinates of longitude 60°12'9"W and latitude 7°29'4"N, thence at true bearing of 273°, for a distance of approximately 3 miles 252 yards, to **Point D**, located at geographical coordinates of longitude 60°14'54"W and latitude 7°29'12"N, thence at true bearing of 359°, for a distance of approximately 3 miles 564 yards, to **Point E**, located at geographical coordinates of longitude 60°14'52"W and latitude 7°32'5"N, thence at true bearing of 89°, for a distance of approximately 5 miles 1515 yards, to the point of commencement at **Point A** and; **Point A**, located at geographical coordinates of longitude 60°9'44"W and latitude 7°29'21"N, thence at true bearing of 360°, for a distance of approximately 3 miles 394 yards, to **Point B**, located at geographical coordinates of longitude 60°9'44"W and latitude 7°32'9"N, thence at true bearing of 89°, for a distance of approximately 6 miles 604 yards, to **Point C**, located at geographical coordinates of longitude 60°4'11"W and latitude 7°32'12"N, thence at true bearing of 180°, for a distance of approximately **2 miles** 1419 yards, to **Point D**, located at geographical coordinates of longitude 60°4'12"W and latitude 7°29'46"N, thence at true bearing of 266°, for a distance of approximately 6 miles 595 yards, to the point of commencement at **Point A**.
- 1.3 Continue to maintain all demarcated boundary limits for the site claim and the periphery of the concession as prescribed by the Guyana Geology and Mines Commission (GGMC).
- 1.4 As far as possible, maintain the following non- extractable, vegetated buffer zone at least 20 m wide as follows:
 - Between your mining blocks and other different contiguous land-use activities.
 - Around the mine site.
 - Around the property boundary.
 - Around any water source/spring located on the property.

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In instances where 20m vegetative buffer zones cannot be maintained and operations have the potential to impact other contiguous activities, then adequate mitigation measures need to be implemented.

- 1.5 Within the legal powers of the Company, ensure proper signage and security measures are in place to discourage the influx of people and keep unauthorized persons from accessing restricted and high-risk areas that are under operation by Guyana Manganese Inc.
- 1.6 Continue implementing the Monitoring Plan and the **Emergency Response Plan as outlined in the Environmental Impact Assessment (EIA) dated April, 2021** and any subsequent approved revisions/amendments of the afore-mentioned documents, for the Project.
- 1.7 Continue to minimize the project footprint in the areas identified for mineral extraction, tailings and sediment ponds, the mine, mineral processing facilities, ancillary facilities and the access road(s).

2.0 EMPLOYEES AND EMERGENCY MANAGEMENT

- 2.1 Establish and regularly update the Company's evacuation plan which must be posted in a conspicuous location for all staff to be aware of.
- 2.2 Install an alarm system and ensure that all employees and third-party contractors are aware of the emergency response protocol and their duties and responsibilities according to the evacuation plan.
- 2.3 Establish and Implement a Mine Health and Safety Program that includes guidelines for contractors and visitor's safety procedures. This plan must include training requirements for all employees, contractors and visitors and outline an emergency evacuation plan for all emergencies such as but limited to fire, medical, medical evacuation (for more serious injuries), explosion, floods, hostile employees/ intruders, vehicle accidents or pit collapse and burial of individuals.
- 2.4 Ensure that the fire escape routes are clearly defined and have emergency lighting in accordance with the requirements of the Guyana Fire Service requirements.
- 2.5 Provide and install firefighting equipment such as fire extinguishers, sand buckets, fire pumps at visible locations on site, in accordance with guidelines established by the Guyana Fire Service.
- 2.6 Ensure all firefighting equipment are maintained and serviced regularly and provide training on the use of the equipment.
- 2.7 Provide Employees/third party contractors with training on good environmental management practices, occupational health and safety and of their obligations under this Permit on a regular basis.

- 2.8 Prepare and maintain a training file for employees/third party contractors, which should be available upon Officers' request during Compliance Inspection.
- 2.9 Employees shall be equipped with Personal Protective Equipment relevant to the occupational tasks during operation. These Personal Protective Equipment (PPE) must include but not be limited to:

- I. Safety helmets;
- II. Protective respiratory devices
- III. Safety boots with ankle support;
- IV. Gloves with reinforced palms and fingers; and
- V. Safety goggles.

(Employees shall at all times be well protected)

- 2.10 Provide well-equipped first aid and snake bite kits at all work sites.
- 2.11 Ensure that communication and transportation systems are in place to respond to all emergencies.
- 2.12 Ensure that proper prophylactic or other acceptable measures are implemented to protect workers and other persons from malaria and other harmful diseases at the project site.
- 2.13 Promote and run health awareness campaigns especially on HIV, STDs and Covid-19 amongst workers as well as local communities upstream and downstream of the project site.
- 2.14 Maintain employment of an Environmental Officer or an Environmental Unit that would be responsible for coordinating Environmental Management, implementing the conditions of this Permit, ensuring employees are trained in environmental management and Emergency Response Procedures and capable of monitoring for compliance with this Permit.

3.0 VEGETATION CLEARING, TOPSOIL STRIPPING

- 3.1 Take necessary precautions to avoid soil compaction, erosion, rutting, siltation and sedimentation during operation by limiting the size of the disturbed area, slope length and gradient, and the duration of soil exposure.
- 3.2 Consider the weather pattern before initiating major earthworks. Monitor areas of exposed soil during periods of heavy rainfall.
- 3.3 Maintain natural vegetative cover as far as practical, especially in the vicinity of steep slopes occurring at project site.
- 3.4 Limit cleared areas to those identified within the mine plan for ore recovery, infrastructure, waste and stockpiles areas, etc. In instances where proposed areas have previously been cleared, a record of clearance should be maintained prior to

commencing additional clearance activities.

- 3.5 Maintain the integrity of areas where riparian vegetation is located to aid in mitigating erosion/sedimentation impacts at the site.
- 3.6 Practice alternative methods of vegetation clearing, such as manual or mechanical felling or bulldozing. Burning vegetation as a means of clearing is strictly prohibited.
- 3.7 Top soil and vegetation should be carefully stripped and stockpiled in an allocated area marked by a sign and bermed to mitigate the free movement of sediments, so that it can be used for reclamation and re-vegetation as mining progresses.
- 3.8 Where practical, locate stockpiles in areas of low permeability. Stockpiles should be graded in such a manner to promote runoff.
- 3.9 Store overburden stockpiles away from the drainage system at least **two hundred (200) meters** away from any water courses. Runoff from this overburden must be directed to the settling pond for treatment before discharge.
- 3.10 Not store topsoil (overburden) within three meters (3m) of natural vegetation or mine face.
- 3.11 Where possible, topsoil should be placed directly onto an area being rehabilitated to reduce double handling of soil.
- 3.12 Employ practical measures such as growing of vegetation e.g. shrubs and grasses on stockpiles of topsoil, to reduce erosion and dust disturbances to surrounding ecosystems.
- 3.13 Implement measures to ensure stockpiled materials are not contaminated during mine operations.

4.0 MINING AND PROCESSING REQUIREMENTS

- 4.1 Adhere to the stipulations within the Mining Act, No. 20 of 1989, the Mining Regulations including the Mining (Amendment) Regulations, 2005.
- 4.2 Operate the major processing component of the mining operation in accordance with the EIA dated April, 2021; this includes Primary and Secondary crushing, Washing, Screening, Gravity Concentration (Batac jigging circuits) and the use of a series of tailings dams.
- 4.3 Ensure that the transport of mined material (ore, overburden, etc.) from the mines to the processing/ waste material dump is done in a manner that prevents adverse impacts to the environment and public safety.

- 4.4 Ensure water accumulated in mine pits, including groundwater and precipitation flow/storm water, are collected and contained within in-pit sumps and directed into sediment ponds prior to being discharged into any waterway.
- 4.5 Conduct continuous geo-chemical characterization of Ore and Gangue material within mines to develop a trace metals characterization profile. pH levels should at all times be maintained to near neutral levels while undertaking all necessary work to control and manage acid mine drainage from the mining and tailing areas.

5.0 DRILLING AND BLASTING

- 5.1 The Permit Holder shall submit a detailed Drilling and Blasting Plan, approved by the Guyana Geology and Mines (GGMC), **within three (3) months after the date of issuance of the Permit**. Adhere to the Protocols of the Drilling and Blast Plan; any modification of the said Plan must be approved by the Commission and submitted to the Agency within **one (1) month** from date of approval.
- 5.2 The Permit Holder shall ensure the use, storage, transport, handling, and general management of explosives are done in accordance with relevant laws and regulations including the **Explosives Act, 1989**, and subsequent amendments and the requirements of the Guyana Geology and Mines Commission and the Guyana Police Force.
- 5.3 Employ and utilise a drilling and blasting supervisor, who is certified and licensed by the Guyana Geology and Mines Commission (GGMC).
- 5.4 The Permit Holder shall ensure the appropriate blast design parameters are in place prior to the actual blasting. Attain minimum ground vibration by the utilisation of:
- Appropriate delay intervals for charge ignition.
 - Appropriate pattern.
 - Orientation of blast holes.
 - Confinement of the charge.
- 5.5 Ensure secondary blasting is avoided as much as possible, rather, drop balling, using a heavy mass operated by a dragline or any other appropriate best available technology/methods shall be considered.
- 5.6 Ensure that a review of the blast design is undertaken where necessary including the size of the Maximum Instantaneous Charges (MICs) and detonating sequence and that the correct stemming is in place.
- 5.7 Ensure that all measures such as the use of deck charges are utilised to reduce ground vibrations.

- 5.8 Ensure that all sites are evacuated and guarded before shots are fired. A distinctive **audible warning signal** must be given before firing and at the all-clear. In addition, notify nearby communities and homesteads of blasting times.
- 5.9 After the firing of Blast pattern, a Post Blast inspection must be conducted by a Certified Blaster/Shotfirer to identify any potential hazards or evidence of a misfire and/or the associated corrective action required to make the area safe before an “ALL Clear” is given prior to personnel and/or equipment being allowed back into blast radius.
- 5.10 Blast Pattern should be allowed a “Post Blast Fume Dispersion” time of **30-40 minutes** to allow prevailing winds or air currents enough time to readily dilute and dissipate to the atmosphere any gases generated in open pit blasting before the Re-entry of Personnel to this area.
- 5.11 After entering Blast radius any person experiencing sudden acute effects of coughing, shortness of breath or irritation of the mucous membranes of the eyes, nose or throat following post-blast Nitric Oxide (NOx) events must be examined by a medical practitioner without delay, even if no NOx smell was noticed or symptoms are mild.

6.0 CRUSHING PLANT

- 6.1 Ensure that the crushing plant and ancillary equipment are operated in strict compliance with the manufacturer’s specifications.
- 6.2 Implement well-designed sprinklers located at strategic points to contain/reduce the level of fugitive dust being emitted into the environment.
- 6.3 The unloading area of crushers and conveyor belts are to be enclosed and provided with a dust suppression system.
- 6.4 Ensure at all times crushing equipment is secured to a reinforced base so as to reduce the level of vibration and noise emitted from this equipment.

7.0 WATER QUALITY AND DRAINAGE MANAGEMENT

- 7.1 Comply with the **Environmental Protection (Water Quality) Regulations, 2000** and adhere to measures outlined for Water Quality Management in the Environmental Management Plan dated April, 2021.
- 7.2 The Permit Holder shall provide within **three (3) months from the date of issuance** of the Permit definite locations (*GPS coordinates of discharge points and receiving water sampling points*), justification of site selection, timelines and sampling methods for surface water monitoring. Any proposed variations to the final points must be approved by the EPA.

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- 7.3 Permitted discharges into the environment from sediment ponds and tailings pond, Support Facilities and final discharge points shall be in accordance with the *Guyana National Bureau of Standards Interim Guidelines for Industrial Effluent Discharge into the Environment* and the *International Finance Corporation (IFC) World Bank Performance Standards*. The following maximum allowable limits should not be exceeded:

Parameter(s)	Maximum Allowable Limits	Frequency of Monitoring
pH	5.0 – 9.0	Quarterly
Total Suspended Solids (TSS)	<50 mg/L	Quarterly
Total Dissolved Solids (TDS)	<50 mg/L	Quarterly
Oil and Grease (O&G)	<20 mg/L	Quarterly
Temperature	<40°C	Quarterly
Turbidity (NTU)	<50mg/L	Quarterly
Conductivity	(<400 µS/cm)	Quarterly
Biological Oxygen Demand (BOD)	<50 mg/L	Quarterly
Dissolved Oxygen (DO)	>5.0 mg/L	Quarterly
Iron (Fe)	<2.0 mg/L	Quarterly
Arsenic (As)	<0.1 mg/L	Quarterly
Zinc (Zn)	<0.5 mg/L	Quarterly
Aluminum (Al)	<5.0 mg/L	Quarterly
Lead (Pb)	<0.2 mg/L	Quarterly
Cobalt (Co)	<0.2 mg/L	Quarterly
Nickel (Ni)	<0.5 mg/L	Quarterly
Calcium (Ca)	<75 mg/L	Quarterly
Cadmium (Cd)	<0.05 mg/L	Quarterly
Copper (Cu)	<0.3 mg/L	Quarterly
Chromium (CrO ₄ ²⁻)	<0.1 mg/L	Quarterly
Magnesium (Mg)	< 30 mg/L	Quarterly
Sodium (Na)	< 200 mg/L	Quarterly
Sulphates	< 500 mg/L	Quarterly
Sulfides	< 0.2 mg/L	Quarterly
Manganese (Mn)	< 0.3mg/L	Quarterly

- 7.4 Conduct Quarterly monitoring of the water quality parameters outlined in condition 6.2 and submit results to the EPA for surface water. Water sampling points and parameters tested should conform to the Environmental Impact Assessment dated April, 2021. These reports should be submitted **two (2) months** after the reporting quarter.

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- 7.5 Install a filter treatment system at the domestic waste water discharge before discharge into the environment. Wastewater shall not be discharged directly into watercourses.
- 7.6 Ensure all Ore Material being stockpiled is done so on an impervious base. This area must be surrounded by perimeter drains and bermed to manage storm water runoff and reduce discharges of sediment.
- 7.7 Ensure ore materials are stockpiled **100m** away from any water body that might be found in the vicinity of the Mine site or processing facilities.
- 7.8 Ensure that Ore stockpiles are surrounded by toe drain and perimeter berms to manage discharges of sediment.
- 7.9 Provide practical containment of water-suspended solids originating from ore stockpiles to facilitate the removal of suspended solids prior to being discharged into the environment or recycled.
- 7.10 Design and install drainage systems such as underground pipelines to minimize disturbances to natural drainage patterns as applicable.
- 7.11 Install silt traps where necessary to avoid siltation and sedimentation of natural surface water body during operation of this facility.
- 7.12 Ensure that surface and perimeter drains are cleared of debris on a regular basis to promote free flow of water in and around the mine site and auxiliary facilities. Drains shall be adequately sloped and self-cleansing.
- 7.13 Direct all waste lines and drains carrying grease, fats, or culinary oil, or similar waste products from the kitchen area into one or more grease trap interceptors. All required grease trap interceptors shall comply with the following:
- Be constructed of durable, corrosion-resistant materials and have water-tight covers securely fastened in place.
 - Have a flow rate sufficient to handle the maximum demand of the connected system.
 - Be installed at strategic locations to allow accessibility for convenient removal of the lid and internal contents.
 - Be designed and installed with proper venting to avoid becoming air bound.
 - Be properly cleaned and maintained according to the manufacturer's recommended frequency.
- 7.14 The Permit Holder shall provide within **three (3) months** from the date of issuance of the Permit, definite plans for installation of new groundwater monitoring wells, stating proposed locations, justification of site selection, timelines and methods that will be employed to prevent loss of the new wells. The plan should also include methods of

drilling and borehole construction. Construction of the well must be done by qualified /licensed or experienced well drilling contractor(s).

- 7.15 Monitor the groundwater well for parameters below and ensure that it's in accordance with the World Health Organisation (WHO) Drinking Water Quality Standards (1993), Guidelines for potable water, not exceeding the limits shown in the following table:

Parameters Heavy metals	WHO Standards (1993) mg/L	Frequency of Monitoring
		Bi-annual
Iron	0.3	Bi-annual
Copper	2.0	Bi-annual
Lead	0.01	Bi-annual
Zinc	3.0	Bi-annual
Manganese	0.4	Bi-annual
Arsenic	0.01	Bi-annual
Parameters to be tested		
Oil and Grease	Not detectable	Bi-annual
pH	5.0 – 9.0 (pH Units)	Bi-annual
Nitrates	50	Bi-annual
Total Dissolved Solids (TDS)	500	Bi-annual
Microbiological Parameters Tested twice yearly WHO Standards (1993)		
<i>E. coli</i>	0 count/100ml	Bi-annual
Total coliform	0 count/100ml	Bi-annual

- 7.16 Submit the data required in condition 7.4 to the Agency as a component of the Environmental Annual Report required in Condition 17.2.

8.0 TAILINGS POND MANAGEMENT

- 8.1 Construct and design tailings ponds with materials which take into consideration the physical and chemical characteristics of the tailings material, including metal leaching and acidic drainage potential.
- 8.2 Ensure that the design capacity of the tailings pond can contain all of the sediment-laden process water, as well as seepage, surface runoff and precipitation from the design storm event with a minimum freeboard of 0.60 m (2 feet) between the design high water level and the top of the channel bank to prevent overtopping.
- 8.3 Execute a consistent programme of continuous inspection and maintenance of the tailings pond dam throughout the operation phase of the project.

- 8.4 Maintain instrumentation in the tailings and water management ponds embankment and their foundations, such as piezometers, settlement plates, inclinometers etc. to monitor their structural stability.
- 8.5 To ensure and maintain a phreatic surface within the embankment continue to monitor and analyze the monitoring data from the piezometers within the embankment of the tailings pond, for early indications of wetting or seepage unto the embankment surface.
- 8.6 Install and maintain decant pipes/systems so that sediment-free water can be discharged and emergency spillways shall be installed to prevent overtopping. Spillways must be rip rapped with coarse material to prevent erosion.
- 8.7 Establish and maintain sedimentation structures to allow for maximum retention time of sediment enriched effluents within the tailings pond, this will allow for settling of suspended solids and natural degradation of possible contaminants.
- 8.8 Conduct annual susceptibility analysis which will investigate the hydrological conditions of the tailings storage site and analyze its susceptibility to failure. The records/reports should be submitted as part of the Environmental Annual Report required in condition Reports must include but not be limited to the following:
 - i. Issues in foundation and stability conditions observed examples: undercutting of embankments, seepage/piping and erosion;
 - ii. Availability and suitability of borrow materials;
 - iii. Flood assessment of the site;
 - iv. Tailing specific factors such as but not limited to pulp density, particle size distribution and acidity all of which can have implications on the structural stability of the tailing storage site.
 - v. Details on any maintenance carried out and monitoring conducted on area, noting any significant issues identified during the monitoring exercise.

9.0 HAUL ROADS

- 9.1 Maintain mine service roads and internal roads from all approved mineral deposits in such a manner to ensure good drainage, erosion control and dust management.
- 9.2 Assist in the maintenance of the Matthews Ridge to Port Kaituma Haul Road.
- 9.3 Ensure that the transport of mined material from the mines to the processing facility is done in a manner that prevents adverse impacts to the environment. All trucks transporting ore shall at all times be covered once loaded.
- 9.4 Take necessary precautions to avoid erosion, siltation and sedimentation of the creeks along haul roads during the operation life of the facility, e.g. sediment traps, screens, revetments and where practical, provision of a buffer zone of at least 100 m between roads and water bodies.

- 9.5 Ensure the running surface of all roads are crowned with a compacted layer and equipped with good drainage on both sides of the road shoulder to catch and direct storm water to the local drainage system and to prevent erosion of roads.
- 9.6 Minimize the clearing of vegetation during road construction and maintenance by restricting the width of road corridors as much as possible, while allowing all works to be conducted in a safe manner.
- 9.7 Ensure that culverts are installed at points of low elevation along new roadways to maintain local drainage patterns and sized to handle wet season flood flows.
- 9.8 Ensure all reasonable and practical measures such as the provision of turnout drains at regular intervals are implemented to prevent erosion of roads.
- 9.9 Ensure adequate safety signs are erected along all roads informing users of dangerous bends, crossing of haul trucks, speed limits, etc.

10.0 HAZARDOUS MATERIALS/WASTE MANAGEMENT

- 10.1 Adhere to the provisions of the **Environmental Protection (Hazardous Waste Management) Regulations, 2000**, and the stipulations within the Pesticides and Toxic Chemicals **Act, No. 13 of 2000**, the Pesticides and Toxic Chemicals Regulations, No. 8 of 2004, the Pesticides and Toxic Chemicals (Amendment) Regulations, No. 8 of 2007.
- 10.2 The Hazardous Material Storage areas shall be clearly labelled, secured and well illuminated when not in use. The following warning signs shall be clearly posted:
 - (a) Danger- Chemical Storage Area "Authorized Personnel Only"
 - (b) Read and Follow all label directions
 - (c) No Smoking
 - (d) No Eating or Drinking
- 10.3 Establish and maintain a register of hazardous materials or chemicals used or generated by the operation. Submit to the Agency, twice yearly (June and December), a report on hazardous waste generation and management for the previous six months including (please see attached form):
 - The name, location and type of facility.
 - Types and quantities (in metric units) of hazardous waste generated.
 - Manner of storage, use, any applied treatment standards/methods and disposal of these substances.
 - Data concerning off-site shipments of waste, i.e. local disposal facility utilized, country to which hazardous waste is shipped, purpose of shipment and amount of waste shipped.
 - A summary of any accidents that may have occurred and any action taken.

- Any waste minimization efforts undertaken by your facility for hazardous material/waste.
- Any other matter the Agency may require.

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

- 10.4 (a) Collect and store waste oils, used batteries, and any other hazardous waste on site until ready for disposal in a manner approved by the EPA.
- (b) Refrain from draining fuel/ lubricants, including waste oils of any quantity from equipment on to the ground and waterways.
- 10.5 Contain all chemicals securely and conform to the safety conditions as outlined in the Material Safety Data Sheet for each chemical. Keep all chemicals in well-sealed and individually labeled containers and properly store in an impervious and well-ventilated room/bond.
- 10.6 Safety Data Sheets for all hazardous materials shall be readily available and easily accessible at all times at the Facility.
- 10.7 Take the necessary precautionary measures during the transport, transfer, use and handling of all hazardous material.
- 10.8 Implement a programme to ensure regular and preventative maintenance of machinery and equipment to prevent leaks and minimize air emissions and hydrocarbon releases.
- 10.9 All hazardous waste shall be stored in a covered, bunded area. This area shall include the following:
- (a) Signage- "Hazardous Waste Storage Area";
 - (b) Low traffic;
 - (c) No floor drains; and
 - (d) Secondary containment capable of containing 110% of the largest volume therein.
- 10.10 Do not service vehicles in mining pits except in instances of emergency repairs.
- 10.11 Maintain emergency spill cleanup kits on site for response to spills.
- 10.12 A fully stocked first- aid kit shall be readily available at the hazardous storage Facility.
- 10.13 Material storage containers shall be inspected weekly for signs of leakage or corrosion and damaged containers must be replaced immediately. Inspection Reports must be maintained and signed by the appropriately qualified inspecting officer and his/her supervisor.

- 10.14 Elevate all waste oil/ chemical tanks and containers so that leaks are easily identifiable.
- 10.15 Collect and store waste oils on site, until ready for disposal or reuse. It is an offence to drain fuel/lubricants including waste oils of any quantity from equipment onto the ground or water way.

11.0 FUEL HANDLING AND STORAGE

- 11.1 Fuel shall at all times be stored above-ground, in a cool, dry place and away from ignition sources. 'No Smoking' signs shall be posted where fuel is handled or stored.
- 11.2 Construct and maintain an impervious secondary containment wall around fuel storage tanks, creating a temporary holding area in the event of accidental spillage. The containment wall for areas with multiple tanks must have the capacity to provide at least 110% containment of the largest tank. The containment wall for areas with solitary tanks must have the capacity to provide 110% containment of each fuel tank. The containment wall MUST be fully sealed to prevent spillage into the receiving drainage system.
- 11.3 Secondary containment, drip trays or other overflow and drip containment measures shall be installed and maintained at connection points or other possible overflow points.
- 11.4 Existing secondary containment around the fuel tanks shall be inspected monthly for cracks and breakage to ensure they are liquid tight to withstand hydrostatic pressure.
- 11.5 All piping must enter or exit the containment over the wall and no part of the tank infrastructure (e.g. dispenser, filling hoses and valves) shall protrude outside the containment.
- 11.6 Ensure that adequate signage is installed in fuel storage areas, such as No Smoking, Flammable Materials, etc.
- 11.7 Protection measures for fuel storage tanks such as painting and coating shall be maintained to minimize corrosion of fuel tanks.
- 11.8 Maintenance and/ or repair of fittings, pipes and hoses shall be conducted monthly and in accordance to manufacturer's specifications. A summarized inspection report shall be compiled and submitted to the Agency as part of the Annual Report required in condition 16.2.
- 11.9 Secondary containment, drip trays or other overflow and drip containment measures shall be installed and maintained at connection points or other possible overflow points.

- 11.10 Leak detection systems shall be installed on all fuel tanks. At least two (2) of the following measures should be implemented:
- (a) Overflow alarms on tanks;
 - (b) Gauging system;
 - (c) Dipstick measurements;
 - (d) Sensors on walls of tanks; or
 - (e) Electric shut down buttons

12.0 WASTE MANAGEMENT

- 12.1 Adhere to the provisions of the **Environmental Protection (Litter Enforcement) Regulations, 2013.**
- 12.2 A Standard Operating Procedure (SOP) shall be prepared and distributed among personnel utilizing and managing the solid waste disposal site. The SOP shall include information related to collection, transportation and disposal of waste at the site, as well as safety precautions and procedures to be employed at the site during its operation. EPA shall be made aware of any changes to the existing SOP.
- 12.3 Provide within **three (3) months of issuance** of the Permit a waste management plan which must include but not be limited to:
- Plans for managing different waste types;
 - Plans for the construction of the “separate waste pits for the disposal of plastics, cardboard and food wastes and for organic wastes” and;
 - Plans for the disposal/Management of Hazardous waste.
- 12.4 Maintain good house-keeping, sanitary and hygienic practices and the aesthetic quality of the surroundings at all times.
- 12.5 Ensure that solid waste pits are located at least one hundred (100) meters away from watercourses, or habitation. The waste sites should be constructed at least 1.5 m above the ground water table and lined with an impervious, earthen or other material to prevent leaching to groundwater.
- 12.6 Ensure that solid waste pits are designed with an impermeable base such as well compacted layer of clay, plastic liners or geotextile to ensure ground water protection and minimize contamination of the subsurface by leachate infiltration.
- 12.7 Provide covered garbage receptacles at strategic locations of the operation and ensure that all solid waste materials are appropriately stored until the time of disposal in the solid waste disposal.
- 12.8 Hazardous wastes inclusive of toxic, corrosive, flammable, volatile, and infectious wastes are strictly prohibited from the waste disposal site.
- 12.9 Organic waste (food waste) shall not be disposed of in the waste disposal site. Undertake composting of, organic waste and reuse organic materials as fertilizer for

re-vegetation of reclaimed areas.

- 12.10 Ensure personnel trained in the recognition of hazardous and other unacceptable wastes, visually inspect all incoming waste loads to verify that no wastes other than those allowed by this permit are disposed of at the solid waste disposal site.
- 12.11 Solid waste and cover material shall be compacted monthly to the smallest practicable volume, to conserve on disposal capacity, and to minimize moisture infiltration and settlement.
- 12.12 Cover material shall be applied no less than **monthly** over the entire working face or more often if necessary to minimize fire hazards, infiltration of precipitation, blowing of litter and fugitive dust. Sources of cover material shall be accessible on all operating days. The thickness of the compacted cover shall be sufficient, with a minimum of 6 inches, so that waste material does not protrude nor becomes visible.
- 12.13 Final cover shall be applied on each area as it is completed; or if the area is to remain idle for over one (1) year. The thickness of the compacted final cover shall not be less than 2 feet. Final cover shall be vegetated to minimize against erosion.
- 12.14 Solid waste handling equipment must be able to compact and spread the solid waste to the smallest practicable volume. Substitute equipment shall be available to provide uninterrupted service during routine equipment maintenance periods, or equipment breakdowns.
- 12.15 Promote the reduction and reuse of waste generated from the facility.
- 12.16 Intentional burning of waste is strictly prohibited. All accidental fires shall be extinguished immediately.
- 12.17 Maintain records and monitoring data, to be provided as required to the EPA. At a minimum, the following records shall be maintained:
 - (a) The number of loads of waste and the weights and/or volume or estimates of weights and/or volume of waste disposed at the waste disposal site.
 - (b) Description of the type of solid waste materials disposed, identified by source of materials.
 - (c) Major operation problems, complaints or difficulties /deviations from the approved plan/management practice outlined in the SOP, recorded at the end of each day waste is disposed at the site (where applicable).
 - (d) Records of all inspections conducted by the Permit Holder, results of such inspections and any corrective actions taken.

- 12.18 These records shall be maintained daily where applicable, summarized monthly, and a synopsis of such be submitted as a component of the Annual Environmental Report. All records shall be signed and dated by the person responsible for completing them.
- 12.19 All vehicles transporting waste shall be adequately covered to ensure waste does not fall or spill onto the road, creating dust and litter, or causing injuries to persons or damage to property. Wastes that are easily moved by wind shall be controlled as necessary to prevent there becoming airborne and scattered.
- 12.20 Operate the Waste Disposal Site, so that unauthorized entry to the facility is restricted. The site shall be accessible only when operating personnel are on duty, except in emergency situations.
- 12.21 On-site vegetation shall be cleared only as necessary. Natural windbreaks such as green belts, shall be maintained where they will improve the appearance and operation of the disposal site.
- 12.22 Place the final cover on the waste disposal site prior to closure. The GPS coordinates of this area shall be recorded. Visible signs shall be erected identifying the boundaries of the waste disposal site.
- 12.23 Traffic signs, markers and/or site personnel shall be provided to promote an orderly traffic pattern to and from the disposal area, maintain efficient operating conditions, and if necessary, restrict access
- 12.24 Maintain a septic system on site at all times. The septic tank should not be located within 1.5 m 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.***

13.0 AIR QUALITY MANAGEMENT

- 13.1 Comply with the provisions of **the Environmental Protection (Air Quality) Regulations, 2000.**
- 13.2 Develop and maintain an inventory of all air emission sources on site.
- 13.3 Ensure employees responsible for visual monitoring are aware of the mitigation measures to be implemented if the threshold for dust monitoring is surpassed.
- 13.4 Use low sulphur diesel where possible to reduce vehicle emissions of sulphur dioxide (SO₂) and particulate matter (PM).

- 13.5 Monitor ambient air quality in accordance with the locations and protocol outlined in the Environmental Impact Assessment dated April, 2021, inclusive of boundary areas near the generator sites to determine compliance with the requisite Standards. Readings should comply with the World Health Organization (WHO) Air Quality Guidelines and the US EPA National Ambient Air Quality Standard (NAAQS) as outlined below:

Table 1: Air Contaminants to be Monitored

Air Pollutant	Averaging Time	Maximum Permissible Level	Type of Monitoring	Frequency of Monitoring
PM _{2.5}	24 h	25 µg/m ³	Ambient	Quarterly
PM ₁₀	24 h	50 µg/m ³	Ambient	Quarterly
Carbon Monoxide	1 h	35ppm	Ambient	Bi-Annual
Nitrogen Dioxide	1 h	200µg/m ³	Ambient	Bi-Annual
Sulphur Dioxide	10 Mins	500 µg/m ³	Ambient	Bi-Annual

- 13.19 Maintenance activities of generators, machines, vehicles or equipment shall be scheduled based on manufacturer's specifications to avoid inefficiencies and noxious emissions.
- 13.20 Employ all practical measures along roads and material stockpiles and other necessary sensitive areas to control and prevent fugitive dust impacts. Dust suppression methods such as watering must be used regularly, specifically during the dry season.
- 13.21 Respond to equipment malfunction or inefficiencies which may result in visible emissions to air. In the event of malfunction leading to abnormal emissions, the operator shall:
- Investigate and undertake remedial action immediately;
 - Adjust the process or activity to minimize those emissions; and
 - Record the events and actions taken.
- 13.22 Operate all mechanical equipment in accordance with the manufacturer's specifications. Additionally, ensure that all mechanical equipment and vehicles are

regularly maintained and operated at their optimal levels to minimize atmospheric emissions.

- 13.23 Ensure that the Manganese ore stored at Matthew's Ridge is wetted and suppressed regularly to avoid air dispersion to downwind residents and other contiguous land-use activities.

14.0 NOISE MANAGEMENT

- 14.1 Adhere to the **Environmental Protection (Noise Management) Regulations, 2000.**

- 14.2 Develop and maintain an inventory of all noise producing equipment on site and the associated noise emissions.

- 14.3 Implement all possible measures to mitigate adverse noise impacts from heavy machinery and generators on the environment. Ensure all significant noise producing equipment, e.g., generators etc. are equipped with appropriate silencers or mufflers or are enclosed in suitable acoustic enclosures where necessary to reduce noise levels to achieve compliance with the GNBS requirements.

- 14.4 Monitor noise emissions quarterly to determine compliance with the Guyana National Bureau of Standards (GNBS) *Guidelines for Noise Emission into the Environment* at a distance of 15 m (50 ft) from the source and at the property boundary.

Industrial	Limits	100dB	(Day-time	(06:00-18:00h))
		80 dB	(Night –time	(18:00-06:00 h))

- 14.5 All sampling and monitoring points are to be submitted on a scaled map of the project site within three months of commencing operation.

- 14.6 All monitoring of noise shall be conducted by trained personnel using calibrated Type 2 sound level meters. The source of noise being monitored shall be assessed for a minimum of fifteen minutes.

- 14.7 Respond to all complaints of excessive noise above the threshold of 85dB with corrective action.

15.0 PROGRESSIVE RECLAMATION AND CLOSURE

- 15.1 Adhere to the Conceptual Closure Plan as outlined in the ESIA Document dated April, 2021. Submit to the Agency any changes in the Conceptual Closure Plan **two (2)** years prior to closure. Thereafter, the closure plan will be updated and reviewed at a frequency agreed to with the Agency.

- 15.2 Ensure progressive reclamation occurs as mining progresses.

- 15.3 Ensure to re-contour mined-out areas within your concession to address the effects such as erosion, wildlife movement, landslide and Occupational Health and Safety hazards.
- 15.4 Re-contour borrow pits from which materials are sourced for the construction of roads and for other infrastructure works to conform to the natural topography of the area. Replace topsoil removed from these areas after excavation to facilitate re-vegetation.
- 15.5 Species used in the re-vegetation of the site as part of the progressive reclamation process, should, as far as possible, be native to the area.
- 15.6 Soil used during the reclamation process should be characteristically suitable for the vegetation to be established on the site. In instances of insufficient stockpiled overburden or topsoil to facilitate the reclamation process, soil from a nearby source should be used to ensure similar soil conditions, to avoid importing of non-native seeds/species.
- 15.7 Restore all waterways temporarily diverted during mining operations to their original channels.

16.0 BIODIVERSITY PROTECTION

- 16.1 Continue to maintain vegetation around production facilities and along access roads to mitigate the impact on terrestrial resources.
- 16.2 Prohibit employees from the capturing, killing and trading of all Wildlife from the project area in accordance with the Wildlife Conservation and Management Act, 2016.
- 16.3 Maintain all water crossings (culvert or bridges) to enable the passage of migratory aquatic species.
- 16.4 Report any occurrences of illegal wildlife trapping and trading in the project area to the EPA and Wildlife Management Authority.
- 16.5 Implement the Biodiversity Management plan, for species protection and conservation in the event that threatened species are encountered.
- 16.6 Sample biodiversity at least once every two years, utilizing, as far as possible, the same methodology used to acquire the ecological baseline in the ESIA, to assess any alteration of species type and abundance.
- 16.7 Record observances of aquatic and terrestrial biodiversity and submit quarterly reports to the EPA. These reports shall be submitted **two (2) months** after the reporting quarter.

- 16.8 Report any occurrences of illegal wildlife trapping and trading in the project area to the EPA and Wildlife Conservation and Management Commission.

17.0 COMPLIANCE MONITORING AND REPORTING

- 17.1 Keep all records of environmental monitoring, malfunctions, pollution of the environment, and any failure to comply with requirements as stated in this Permit in an acceptable format, which should be made available to the EPA upon request.
- 17.2 Submit **Annual Environmental Reports** to the EPA on or before **March 31** every year of environmental management activities; status of the project, progress of the implementation of the EMP, monitoring activities, as well as compliance with the conditions of this Permit. (Please see attached the reporting format for the preparation of Environmental Annual Reports.)
- 17.3 Ensure the reports and records of monitoring include the following:
- a) The names of the individuals and designations, who conducted sampling, prepared and compiled the reports;
 - b) The date, place/location, time, weather conditions, techniques and methods used in sampling;
 - c) The date the measurements were compiled or analysed and the names of the individuals who compiled the information;
 - d) Observations, readings, calculations, benchmarks, bench data, the results of analyses;
 - e) Limitations of the sampling process and all other occurrence at the time of study, which may affect the results;
 - f) Possible sources of error during monitoring activities;
 - g) Photographs and drawings of all relevant aspects of the operation; and
 - h) The state of operation of facilities at the time of measurement, including planned and unplanned shutdowns, production levels and achievement of design capacity, identification of release point, source of release and substances being released.
- 17.4 Notify the EPA within **one (1) hour** of the occurrence of any environmental emergencies.
- 17.5 Immediately notify the EPA of any accidental release of contaminants or incidence of pollution into the environment. The Permit Holder shall provide the financial, equipment and technical capacity to adequately respond to any emergency that may occur on site and emergency response shall be immediate.

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- 17.6 Comply with any lawful directions given by the EPA from time-to-time in furtherance of the implementation of any international or other obligations for the environmental protection.
- 17.7 Foster good corporate relations involving the Regional Democratic Council (RDC), residents, Village Councils and other stakeholders, where general information can be shared and major concerns or complaints resolved. Adhere to the agreement signed between Guyana Manganese Inc. and the Port Kaituma Neighborhood Democratic Council, Matthew's Ridge, and Arakaka Communities.
- 17.8 Inform the National Trust and Walter Roth Museum if any artifacts of archaeological and anthropological significance are unearthed during operations.
- 17.9 Be responsible for payment for all environmental audits and compliance monitoring associated with this Permit.
- 17.10 Conform to all terms and conditions under which this Permit is granted and be liable for any loss or damage which arises from the project as a result of the Permit Holder's activities or breach of any term or condition of this Permit.
- 17.11 Commission an independent environmental audit of the operation every two (2) years using a Terms of Reference agreed upon by the EPA and the Company and submit the report to the Agency within **three (3) months** of completion of the audit.

18.0 LIABILITY AND INDEMNIFICATION FOR POLLUTION DAMAGE

- 18.1 The Permit Holder shall be strictly liable for any loss and / or damage to the environment through any act caused intentionally or recklessly, through the adverse effect of any discharge or release, or cause or permit the entry of pollution, contaminant in any amount, concentration or level in excess of those prescribed by the regulations or stipulated by any environmental authorisation, which are attributed to the Project. (s.19(1) EP Act).
- 18.2 Where the Permit Holder in accordance with s. 19(3) is found liable for the contaminant or for the process involving the contaminant or who causes or permits a discharge as aforementioned in relation to above, shall:
 - (a) Immediately notify the Agency of –
 - (i) the discharge;
 - (ii) the concentration and amount contaminant
 - (iii) the circumstances of the discharge;
 - (iv) What action the person has taken or intends to take to restore the natural environment;
 - (b) Be liable to pay for the cost of an independent investigation into the discharge.
- 18.3 The Permit Holder shall be guilty of any offence in accordance with s. 39 (1), (2), (3), (4) of the EP Act, Laws of Guyana, which states every person who causes material or serious environmental harm by polluting the environment intentionally or recklessly

and with the knowledge that material and or / serious environmental harm will or might result is guilty of an offence and shall be liable to the penalties prescribed under the said Act.

- 18.4 The Permit Holder shall compensate any party who suffers any loss or damage as a result of the attributed project. (PART V s. 19 (3) (e)).
- 18.5 To the extent permitted by Law, the Permit Holder shall indemnify, defend and hold harmless the Agency (EPA) from liability including all claims and losses, and all related costs, and expenses (including reasonable attorney's fees and costs of investigation, litigation, settlement, judgments, interest and penalties) resulting to any person, firm or corporation that may be injured or damaged as a result of the Permit Holder in the performance of the said project, that are attributed to the negligence or tortuous acts of the Permit Holder or any of its sub – contractors and / or by anyone else for whose acts any of them may be liable.
- 18.6 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.

19.0 INSTITUTIONAL AUTHORITY/LIABILITIES

- 18.1 The EPA reserves the right to conduct regular inspections of the Permit Holder's operation as part of its monitoring and enforcement requirements under the Environmental Protection Act, Cap. 20:05, Laws of Guyana, the Environmental Protection (Amendment) Act, 2005, and the Environmental Protection (Authorisations) Regulations, 2000.
- 18.2 The EPA reserves the right to review and/or amend the permit conditions and fees attached to this Permit, which also includes the review and/or amendment of permit fees in consideration of any changes in fee structure as determined by the Agency for projects of this nature.
- 18.3 The EPA shall have the right to cancel or suspend this Permit for breach of any of the terms and conditions contained herein.
- 18.4 The Permit Holder, His Servants, Agents and/or Sub-Contractors 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 s.38 of 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.

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- 18.5 The Permit Holder shall comply strictly with section 39 (1), (2), (3) and (4) of the Environmental Protection Act Cap 20:05, Laws of Guyana.
- 18.6 This Environmental Permit is not the final consent; all relevant permissions should be obtained from other regulatory bodies for continued operation.
- 18.7 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 biodiversity, protected species and natural habitat with respect to any release or discharge, spill, contaminant fluids, oil or lubricants from the fuel storage.
- 18.8 Where it appears to the Agency (EPA) that the Permit Holder is engaged in any activity that may pose serious threat to natural resources or serious pollution of the Environment or any damage to public health, the (EPA) shall issue to the Permit Holder a Prohibition Notice Order to immediately cease the offending activity. S. 27 EP Act, Cap. 20:05.
- 18.9 Should the Permit Holder contravene or is likely to contravene any condition of this Permit, the Agency (EPA) may serve him an enforcement notice in accordance with s. 26 of the EP Act Cap. 20:05, Laws of Guyana.
- 18.10 This Environmental Permit is effective for the period stipulated herein **July, 2021 to June, 2026**.
- 18.11 This Permit shall remain valid until **June 30, 2026**, unless otherwise suspended or revoked in accordance with the provisions of this Permit or the Environmental Protection Act, Cap. 20:05, Environmental Protection (Amendment) Act, 2005, and the Environmental Protection Regulations, 2000.
- 18.12 This Permit must be renewed by submitting a completed Application Form for Renewal of Environmental Authorisation to the Agency at least six months before this Permit expires, that is, no later than **December 31, 2025**.
- 18.13 Any late submission of renewal Application(s) after the specified date as stated above, shall 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 day late, until such renewal application is submitted to the Agency, without prejudice to any other rights of the Permit Holder in connection therewith.
- 18.14 Failure to comply with the requirements of this Permit shall render the Permit Holder liable to prosecution and to civil penalties and/or injunctive reliefs prescribed under the Environmental Protection Act, Cap. 20:05, Laws of Guyana, the Environmental Protection (Amendment) Act, 2005, and the Environmental Protection (Authorisations) Regulations, 2000, including under any existing and forthcoming regulations made under the said Act or any other applicable Laws of Guyana.

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Signed by _____ on behalf of the Environmental Protection Agency.
Mr. Kemraj Parsram
Executive Director

Date _____

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, and the Environmental Protection Regulations, 2000, and any forthcoming regulations and standards made under this Act.

NAME	
DESIGNATION	
SIGNATURE	
DATE	

