

Tel: +233 (0) 302 302938782 / 302963802

Email: accrawest.region@epa.gov.gh

Location: Amasaman

Website: <http://www.epa.gov.gh>

GPS Digital Address: GW-0021-2180



**Environmental Protection Agency  
Accra West Region**

P. O. Box MB 461  
Ministries Post Office  
Accra, Ghana

**SCHEDULE TO THE ENVIRONMENTAL PERMIT**

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| 1.0 | <b>CONTACT:</b>  | <b>THE CHIEF EXECUTIVE OFFICER</b>   |
| 2.0 | <b>COMPANY:</b>  | <b>ELECTRO-RECLYING GHANA LIMITED<br/>P. O. BOX 283<br/>ABEKA LAPAZ -ACCRA</b> |
| 3.0 | <b>TELEPHONE:</b>  | <b>0243776026</b>  |
| 4.0 | <b>REGISTRATION NO.:</b>   | <b>GAR/AW/CU.831</b>   |
| 5.0 | <b>PERMIT NO.:</b>   | <b>GARCU0831 /01</b>   |
| 6.0 | <b>DATE OF ISSUE (PERMIT):</b>   | <b>JUNE 29, 2022</b>   |
| 7.0 | <b>VALIDITY PERIOD (PERMIT):</b>   | <b>JANUARY 10, 2022 - JULY 09, 2023</b>  |
| 8.0 | <b>ENVIRONMENTAL ASSESSMENT OF AN EXISTING 120,000 MT COLLECTION, DISMANTLING, ASSEMBLING/REFURBISHMENT AND SERVICING CENTRE OF ELECTRONIC APPLIANCES PROJECT LOCATED AT OYARIFA IN THE LA NKWANTANANG MADINA MUNICIPALITY OF THE GREATER ACCRA REGION</b> |  |

In pursuance of the Hazardous and Electronic Waste Control and Management Act, 2016, Act 916, Hazardous, Electronic and Other Wastes (Classification) Control and Management Regulations 2016 (LI 2250), the Environmental Assessment Regulations 1999 (LI 1652) and on the basis of the information provided in the Annual Environmental Report submitted to the Agency and Screening Report, this environmental permit is issued authorizing **ELECTRO-RECYCLING GHANA LIMITED** to continue the operations of the existing 120,000 metric tonne collection, dismantling, assembling/refurbishment and servicing centre of electronic appliances project located at Oyarifa in the La Nkwantanang Madina Municipality.

**9.0 CONDITIONS OF PERMIT**

**9.1 Commitment to Project Specification**

Comply with all relevant project specifications, mitigations, monitoring and other environmental management provisions as indicated in the Annual Environmental Report.

**9.2 Project Description**

The electrical and electronic waste project consist of a 120,000-metric tonne per annum with the following components:

- a) Warehouses with Storage Areas, Dismantling Area, Assembling/Refurbishment Area; and a Service Centre
- b) Offices
- c) Operation of a collection, dismantling, assembling/refurbishment centre of electrical and electronic waste;
- d) Storage of electrical and electronic waste; and
- e) Transportation of waste electrical and electronic items.

### 9.3 Project Location

- a) The proposed facility is located at Oyarifa in the La Nkwantanang Madina Municipality of the Greater Accra Region.
- b) Land take: 2.28 Acres
- c) Geographical Coordinates: 5.769852°N, 0.181858°W

### 9.4 Management of Non-Hazardous Wastes

- a) Liquid waste should be channelled into a septic tank and dislodged periodically.
- b) Provide litterbins for solid waste collection, storage and disposal.
- c) Ensure appropriate drainage measures to collect and transport storm water at the premises.
- d) Ensure that there is no burning of refuse within and outside the premises of the facility.

### 9.5 Management of Hazardous Wastes

- a.) Comply with section 19 (1) of the Hazardous, Electronic and Other Wastes (Classification) Control and Management Regulations 2016 (LI 2250) on the management of hazardous waste to prevent any risk of pollution or damage to the environment.
- b.) Ensure that all hazardous materials are classified and sent to a treatment facility or recycler registered by the Agency.
- c.) Maintain an accurate inventory of all waste materials collected, transported, delivered, and stored at the facility.
- d.) The burning of all forms of electrical and electronic waste is prohibited.

### 9.6 Management of Electrical and Electronic Waste

#### *Electro-recycling Ghana Ltd shall:*

- a) Comply with section 45 (1) of the Hazardous, Electronic and Other Wastes (Classification) Control and Management Regulations 2016 (LI 2250) on the responsibility of a producer of electrical and electronic equipment.
- b) Comply with section 46 (1) of the Hazardous, Electronic and Other Wastes (Classification) Control and Management Regulations 2016 (LI 2250) on the responsibility of a refurbisher or repairer of electrical and electronic equipment.
- c) Comply with section 47 (1) of the Hazardous, Electronic and Other Wastes (Classification) Control and Management Regulations 2016 (LI 2250) on the responsibility of the operator of a collection centre of electrical and electronic equipment.
- d) Comply with section 49 (1) of the Hazardous, Electronic and Other Wastes (Classification) Control and Management Regulations 2016 (LI 2250) on the responsibility of a dismantler of electrical and electronic equipment.
- e) Comply with section 51 (1) of the Hazardous, Electronic and Other Wastes (Classification) Control and Management Regulations 2016 (LI 2250) to provide disposal containers for the disposal of electrical and electronic waste

- f) Comply with section 53 (1) of the Hazardous, Electronic and Other Wastes (Classification) Control and Management Regulations 2016 (LI 2250) on the storage of electrical and electronic waste.
- g) Comply with sections 56 (1), 56 (2), and 56 (3) of the Hazardous, Electronic and Other Wastes (Classification) Control and Management Regulations 2016 (LI 2250) on the transportation of electrical and electronic waste.

**9.7 Compliance with the Technical Guidelines on Electrical and Electronic Waste**  
*Electro-recycling Ghana Ltd* shall comply with the following principles in the technical guidelines on Electrical and Electronic Waste:

- a) Comply with the guiding principles for Collectors;
- b) Comply with the guiding principles for Collection and dismantling Centres;
- c) Comply with the guiding principles for Transportation

**9.8 House Keeping and Warehouse Management**

- a) Adequate storage space should be provided for received and dismantled electrical and electronic waste to ease congestion and free movement in the warehouse and during emergencies.
- b) Train all staff on how to segregate items into their compatible groups.

**9.9 Occupational and Public Health and Safety**

- a.) Manage and operate the facility in accordance with a written management system that identifies and minimizes risks of pollution, including those arising from operations, maintenance, accidents, incidents and non-conformities.
- b.) Create adequate space to allow for access and free movement to all sections of the facility during emergencies.
- c.) Erect appropriate signage at vantage points to serve as warning so as to prevent any incidents/accidents.
- d.) Develop a Standard Operating Procedures (SOPs) for your operations and ensure adherence to strict procedures and constant monitoring of all operations to forestall any incidence.
- e.) Provide adequate sanitary and washroom facilities at the site.
- f.) Provide first aid kits for minor injuries that might occur during operations.
- g.) Provide personal protective clothing such as goggles, safety boots, helmets, nose masks, overalls, etc. to the workers.
- h.) Organize environmental awareness training programmes to sensitize workers on the need to follow laid down procedures in the operation of the facility.
- i.) Provide adequate protection and signalling off work sides by marking of the safety border on the workers perimeter.
- j.) Ensure that pedestrian areas are clearly defined and marked.
- k.) The project site should be fenced and cautionary notices visibly displayed to ward off the public from the site.

**9.10 Compliance with the Electrical and Electronic Waste Levy Under Act 917**

*Electro-recycling Ghana Ltd shall:*

- a) Comply with section 20 (1) of the Hazardous and Electronic Wastes Control and Management Act, 2016 (Act 917).
- b) Comply with section 20 (2) of the Hazardous and Electronic Wastes Control and Management Act, 2016 (Act 917).

- c) Comply with section 22 of the Hazardous and Electronic Wastes Control and Management Act, 2016 (Act 917).
- d) Submit half-yearly report as part of the annual environmental report to the Agency of items or products refurbished, placed on the market for the assessment of eco-levy payment.

**9.11 Compliance with the Memorandum of Understanding (MOU)**

- a. Comply with the provisions of the Memorandum of Understanding (MOU) between Electro Recycling Ghana Limited and ELOREC GMBH
- b. The existence of this MOU does not constitute an approval by the Agency to import defective or waste electrical and electronic items into the country without the necessary permit from the Agency.
- c. Submit half-yearly report as part of the annual environmental report to the Agency on the status of implementation of the MOU including the details of items received for refurbishment and exported for recycling.

**9.12 Regulatory Requirements**

Notwithstanding this permit, the project is further subject to other relevant regulations and permits pertaining to the sector and must be observed. These include the following amongst others;

- a) National Building Regulations, 1996 (LI 1630)
- b) Public Health Act, 2012 (Act 851)
- c) Fire Precaution (Premises) Regulations, 2003 (LI 1724)
- d) Factories, Offices and Shops Act, 1970 (Act 328)
- e) Persons with Disability Act, 2006 (Act 715)
- f) Management of Ozone Depletion Substances and Products Regulations, 2005 (LI 1812)

**9.13 Comply with the Ghana Standards for Environment and Health Protection**

- a) Comply with the Ghana Standards for Health Protection – Requirements for Ambient Noise Control (GS 1222, 2018)
- b) Comply with the Ghana Standards for Environmental Protection – Requirements for Effluent Discharge (GS 1222, 2019)
- c) Comply with the Ghana Standards for Environment and Health Protection – Requirements Ambient Air Quality and Point Source/Stack Emissions (GS 1236, 2019).
- d) Comply with La Nkwantanang Madina Municipal Assembly bye-laws on noise and sanitation.

**9.14 Environmental Monitoring**

Monitor the following at the facility:

- a) Accidents and incidents as set out in Form G of the Seventh Schedule of LI 2250;
- b) Noise
- c) Occupational health and safety
- d) Waste generation and disposal
- e) Report on the outcome of the monitoring in the Annual Environmental Report.
- f) Inventory of e-waste materials collected or handed over to the collection and dismantling facility as set out in Form F of the Seventh Schedule of (LI 2250).
- g) Inventory of defective components shipped abroad.

**9.15 Notification of Changes**

- a) Notify EPA of any major changes in the planned development contrary to the information provided in the Form H16.

**9.16 Annual Environmental Report**

- a) Submit Annual Environmental Report Company's operations to the Agency in accordance with Regulation 25 of (LI 1652). The next report should be submitted on or before 28<sup>th</sup> **June, 2023**.
- b) The annual shall contain information as set out in Form F of the Seventh Schedule of the Hazardous, Electronic and Other Wastes (Classification) Control and Management Regulations 2016 (LI 2250).
- b) The Annual Environmental Reports together with Site Inspection Reports will serve as the basis for the Environmental permit.

**9.17 Environmental Management Plan**

Submit Environmental Management Plan on your operations to the Agency within 12 months and thereafter every 3 years in accordance with Regulation 24 of (LI 1652).

**9.18 Right of Entry**

The company shall allow authorized representatives of EPA to enter the facility to:

- a) Access and verify records that must be kept under this permit.
- b) Inspect and audit any facilities, equipment, practices and/or operations regulated or required under this permit.
- c) Monitor substances and/or parameters for the purposes of ensuring compliance with this permit.

**9.19 Other Permits**

- a) Notwithstanding this Permit, the project is further subject to other relevant regulations and permits pertaining to the sector.
- b) Ensure that a separate permit is obtained to ship defective components or items to **ELOREC GMBH** for the purpose of recycling.

**9.20 Permit Limitation**

- a) This permit does not cover the production/manufacturing, treatment and recovery/recycling of electrical and electronic items.
- b) Separate permits would be required for these projects.
- c) This permit does not cover shipment of defective components.

**9.21 Permit Awareness**

- a) A copy of this permit shall be displayed prominently on the premises at all times.
- b) All staff at the premises shall be familiar with the conditions of this permit.

**9.22 Permit Transferability**

This permit is not transferable and covers only the operations of **ELECTRO-RECYCLING GHANA LTD's** existing facility as prescribed in section 9.2 of this permit and located at Oyarifa in the La Nkwantanang Madina Municipality of the Greater Accra Region.

**9.23 Validity Period**

This permit is valid for a period of 18 months effective January 10, 2022 and shall expire on July 09, 2023.

**9.24 Permit Renewal**

This permit must be renewed by submitting the necessary applications to the Agency three (3) months before the permit expiration date.

**9.25 Revocation, Suspension and Refusal of Permit**

The Agency shall revoke or suspend a permit issued or shall refuse to renew a permit where:

- (a) The provisions and conditions of this permit are not being satisfactorily complied with.
- (b) The continued operation of the project poses a risk to the environment, public health and safety.
- (c) The operations by the proponent have deteriorated below the required standard.

**9.26 Penalty for breach of conditions of the Environmental Permit**

**Providing false information or failure to comply with any or observe all the permit conditions above shall:**

- a) Attract administrative penalties as shall be presented by the Agency.
- b) Attract the necessary fines as prescribed under Hazardous, Electronic and Other Wastes (Classification) Control and Management Regulations 2016 (LI 2250).
- c) Render this Environmental Permit invalid
- d) Lead to suspension or revocation of this permit or prosecution.

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**EBENEZER APPAH -SAMPONG**  
**DEPUTY EXECUTIVE DIRECTOR/TECHNICAL SERVICES**  
**FOR: EXECUTIVE DIRECTOR**

**JUNE 29, 2022**  
**DATE ISSUED**

**11.0 NOTIFICATION**

The Hon. Minister, Ministry of Environment, Science, Technology & Innovation, Accra.  
The Executive Director, Environmental Protection Agency, Accra.  
The Director, Greater Accra West Regional Office, Environmental Protection Agency, Amasaman.  
The Chief Inspector of Factories, Factories Inspectorate Department, Accra. ✓