DEPARTMENT OF THE ENVIRONMENT

Market Square Belmopan, Belize Tel: 501-822-2548 / 2819



Please Quote: PRO/DEV/02/347/19 (82)



March 20, 2019

Mr. Geoffrey de Sibert Belize Sustainable Agriculture Limited 1826 Bougainvillea Street Belmopan Belize

Dear Mr. Sibert,

Please be informed that Environmental Clearance is hereby granted to Belize Sustainable Agriculture Limited for the establishment, management and operations of an agricultural production and processing facility located in the West Cotton Tree Area, Cayo District. This Environmental Clearance is granted subsequent to the signing of an Environmental Compliance Plan signed on March 20, 2019.

Kindly be informed that Belize Sustainable Agriculture Limited are required to comply with all the stated terms and conditions within the ECP. Disregard of any of the terms and conditions stipulated in the ECP may result in the revocation of the Environmental Clearance and/or legal actions being taken against Belize Sustainable Agriculture Limited.

No changes or alterations to what has been agreed within the ECP may be permitted without the written approval of the Department of the Environment.

Thank you for your kind consideration and cooperation.

Regards,

Chief Environmental Office

Department of the Environme



ENVIRONMENTAL COMPLIANCE PLAN

WRITTEN BY:

THE DEPARTMENT OF THE ENVIRONMENT

FOR:

Belize Sustainable Agriculture Limited

In Regards To

THE ESTABLISHMENT OF AN AGRICULTURAL PRODUCTION AND PROCESSING FACILITY LOCATED IN THE CAYO DISTRICT

March, 2019

This Environmental Compliance Plan supersedes the Environmental Compliance Plan signed between the DOE and BSAL on October 23, 2013 for the activities proposed at this specific location.

ENVIRIONMENTAL COMPLIANCE PLAN

FOR

Belize Sustainable Agriculture Limited FOR

THE ESTABLISHMENT OF AN AGRICULTURAL PRODUCTION AND PROCESSING FACILITY CAYO DISTRICT

The following are the terms and conditions of the Environmental Compliance Plan (ECP) entered into between "Belize Sustainable Agriculture Limited," hereinafter referred to as the 'Developer,' and the "Department of the Environment," hereinafter referred to as the "Department" or "DOE" in respect to the establishment of an agricultural production and processing facility located in the West Cotton Tree Area, Cayo District.

It is agreed that the terms and conditions of this compliance plan shall be binding upon Belize Sustainable Agriculture Limited, its servants, agents or assigns. The terms and conditions embodied in this compliance plan are made pursuant to Regulation 22A (1) of the Environmental Impact Assessment (Amendment) Regulations, 2007 and Section 20 (7) of the Environmental Protection Act, Chapter 328 of the Substantive Laws of Belize, Revised Edition 2000-2003 as amended by the Environmental Protection (Amendment) Act, 2009. Environmental Clearance is being granted under strict conditions contained in this ECP, which were developed during the environmental clearance process. This ECP supersedes the Environmental Compliance Plan signed between the DOE and BSAL on October 23, 2013 for the activities proposed at this specific location.

PURPOSE

The purpose of this document is to officially institute best practice measures that would prevent, control and mitigate the environmental degradation that may arise from the project. It must be borne in mind that this Environmental Compliance Plan was prepared based on the best available information contained in the Environmental Impact Assessment for this project and those gathered by the National Environmental Appraisal Committee and the Department. The Department therefore reserves the right to make modifications to this compliance plan, with prior consultation with the Developer, as the project develops and more information becomes available.

The Developer agrees to adhere to this document during all stages of the development of the project. The Department and other relevant agencies will conduct periodic monitoring to ensure compliance with the conditions herein. Any material breach of any of the terms and conditions of this compliance plan may result in the revocation of environmental clearance for this project.

This compliance plan is a dynamic one and may be reviewed and revised from time to time as the project develops and more information becomes available. The Developer must note that obtaining environmental clearance does not absolve the need to obtain other permits and approvals from other relevant agencies. Notification of any disregard or violations will be presented to the Developer/agents or assignees in writing who will immediately take actions to rectify the violation.

The ECP is a non-transferable document; therefore it cannot be transferred to any other company, organization or interested party. This ECP was developed for the sole use by Belize Sustainable Agriculture Limited.

1.0 SPECIFIC ACTIVITIES FOR WHICH CLEARANCE IS BEING GRANTED

Environmental clearance is being granted for the following:

The development of approximately 4,905 acres located in the West Cotton Tree Area for the establishment of an agricultural and processing facility as follows:

- Agricultural plantation of approximately 4,680 usable acres for cultivation of corn, beans, peas, sorghum, and other seasonal crops;
- Planting and cultivation of a 4680 acres of sugar cane
- Construction of sedimentation/retention ponds based on the drainage patters of the facility. Establishment of a buffer zone along the entire perimeter of the property;
- Roads and drainage infrastructure consisting of approximately 100 acres;
- Construction of an agricultural storage facility consisting of silos, hoppers, and bins as well as conveyer systems for drying, storage and processing related activities within the Export Processing Zone, at Developer's discretion;
- Establishment of an office and administrative facility, at Developer's discretion;
- Establishment of 2.01 acres workers housing area, outside of the Export Processing Zone but within the project site, at Developer's discretion;
- Establishment of a 70 acres Export Processing Zone within the project site, at Developer's discretion.

No further development shall be undertaken in the project area outside of what has been agreed to and described in this compliance plan, without the prior written permission of the Department of the Environment.

2.0 ENVIRONMENTAL IMPACTS

The Department of the Environment has prepared this environmental risk analysis based on the project information contained in the Environmental Impact Assessment Study and other relevant information gathered by the National Environmental Appraisal Committee and the Department. This Environmental Compliance Plan was then developed to mitigate the negative environmental

impacts associated with this type of development.

POTENTIAL SOURCES OF ENVIRONMENTAL IMPACTS DURING DEVELOPMENT AND IMPLEMENTATION OF THE PROJECT:

- A. Pesticide poisoning of residents in nearby communities;
- B. Contamination of ground and surface water during from the use of agrochemicals and surface run-off;
- C. Contamination of soil by hazardous material such as battery acid and petroleum based substances;
- D. The loss of biodiversity and ecosystem functions and goods and services;
- E. Potential noise impact from machinery;
- F. Potential soil compaction and contamination of soil resources;
- G. Potential disturbance from dust.

This list is by no means an exhaustive list of potential environmental impacts that could arise from the said proposed project.

3.0 ENVIRONMENTAL COMPLIANCE PLAN

The implementation of this project will be carried out only for those activities described in Section 1.0 of this Environmental Compliance Plan. No further development will take place outside of what has been proposed without the prior written permission of the Department of the Environment. *Environmental Clearance* will need to be obtained from the Department of the Environment for all new activities outside of what is agreed upon in this Environmental Compliance Plan.

Recognizing that the project could have potential negative environmental impacts, the Developer hereby agrees to take the necessary measures described in the following actions to mitigate these impacts.

3.01 CLEARING OF LAND

In an effort to mitigate the negative impacts associated with clearance of the land (habitat loss, habitat fragmentation and decrease in wildlife), the Developer agrees to take the following measures:

3.01.1 In an effort to mitigate against potential unwarranted health risks associate with the dispersal of agrochemicals used, particularly from aerial spraying and erosion, a

- hundred (100) feet vegetated buffer will be maintained along the entire western, eastern and northern boundaries of the property and along the southern boundary, a buffer of two hundred (200) feet will be maintained.
- 3.01.2 The Developer shall establish within each of the three parcels that comprise the project area, at least two (2) vegetated pockets of no less than 4 acres each to allow for biological connectivity to facilitate the movement of wildlife through the property.
- 3.01.3 A vegetated buffer, of no less than 10 feet wide, shall be established/maintained around each of the retention/sedimentation ponds constructed.
- 3.01.4 Should any find be made of any important habitat niche (mammals, birds, reptiles), every effort shall made for their protection and possible transfer to another natural environment.
- 3.01.5 Land clearance activities will be limited to the dry season. Should land clearance be undertaken during the wet season or periods of heavy rainfall, necessary measures should be taken to mitigate against erosion and sedimentation of surrounding water bodies, including the Belize River.
- 3.01.6 The Developer shall as much as possible conduct salvaging of logs within the property wherever possible. In addition, the Developer shall employ a combination of mulching and burning in windrows. Burning will be conducted in such a manner and time of day when it poses the lease possible nuisance to the surrounding communities. In an effort to reduce nuisance associated with burning, burning will be conducted in a phase approach as per development outlined in the EIA Report.

3.02. AGROCHEMICAL MANAGEMENT AND AGRICULTURAL ACTIVITIES

Agrochemical use may have major detrimental impacts on the nonagricultural terrestrial and aquatic ecosystems. However, these detrimental environmental impacts of agriculture can be minimized only if there is much more efficient use and recycling of nitrogen and phosphorus in agro-ecosystems. In addition, agrochemicals, if not properly managed may pose unwarranted health risks. Therefore, in an effort to mitigate the potential negative impacts to surrounding freshwater ecosystems, which could be greatly eutrophied by high rates of nitrogen and phosphorus release and impact to human health as a result of agrochemical application, the Developer agrees to take the following measures:

- 3.02.1 The Developer will comply with all policies, rules and regulation of the Ministry of Natural Resources (MNR), pertaining to the use and application of agrochemicals.
- 3.02.2 Only Registered Pesticides as approved by the Pesticides Control Board will be allowed for use. In addition, the application of pesticides and agrochemicals shall only be conducted by Pesticides Control Board Certified Applicators with a valid license.
- 3.02.3 To mitigate against eutrophication of surrounding freshwater resources, especially the

Belize River, the Developer may construct suitably sized retention/sedimentation ponds with adequate drainage system for the recycling of nutrient rich waters for irrigation purpose, using the center pivot system or other appropriate systems. The final designs of the drainage system and retention/sedimentation ponds, if any, will be submitted to the Department of the Environment and the Ministry of Natural Resources for approval, prior to construction.

- 3.02.4 Prior to commencing retention/sedimentation ponds and drainage network construction, the Developer must consult with the Ministry of Natural Resources to ensure that the pertinent permit/license is obtained.
- 3.02.5 Retention/sedimentation ponds will be monitored regularly for sediment built up. These will be periodically remove for dewatering and dried solids used as soil conditioner. The collected leachate will be recycled into the retention/sedimentation ponds for irrigation purposes.
- 3.02.6 At the time aerial spraying is applicable, the Developer will ensure that such services are contracted only from providers having the necessary approvals/permits from the relevant government agencies, namely the Civil Aviation Department and the Pesticides Control Board.
- 3.02.7 All agrochemicals will be stored in a secure area that is properly ventilated. Chemical storage will be in accordance with the Material Safety Data Sheets. Each different type of chemical will be stored separately within one building.
- 3.02.8 Chemical storage area must be separate and apart from any administrative or kitchen facility. In addition, electrical wiring in the chemical storage area must be within fire proof conduits to mitigate against fires.
- 3.02.9 The chemical storage area must be equipped with one entry and one exist point. Furthermore, these areas must be kept free of any obstacles to facilitate easy access in and out of the storage area.
- 3.02.10 Chemical storage area must be equipped with at least two (2) twenty pounds Dry Chemical Fire Extinguisher conspicuously located and easily accessible in the immediate area. The Developer shall ensure that personnel are properly trained on the use of these extinguishers in the event of a fire.
- 3.02.11 The Developer shall ensure that all relevant personnel are properly trained on the management of agrochemicals, including measures to address poisoning. In addition, the Developer shall ensure that only authorized personnel are allowed to handle agrochemicals and that they are provided with adequate Personal Protective Equipment (PPE).
- 3.02.12 The Developer shall be responsible to ensure that personnel handling agrochemicals are properly attire with the required PPE.

- 3.02.13 Proper first aid facilities will be provided for employees in the event of an emergency. This must include at least one eye-wash and skin flush station.
- 3.02.14 No Genetically Modified organisms will be permitted for cultivation in Belize, without prior approval from the relevant entity. In addition, all seeds or plant materials imported will require an import permit from the Belize Agricultural Health Authority.
- 3.02.15 The Developer must comply with Global Good Agricultural Practices (G.A.P.) requirements for crop cultivation, including adhering to approved agrochemicals applications regimes and harvesting requirements.

SUGAR CANE HARVESTING:

- 3.02.16 The Developer shall refrain wherever possible from the burning (pre-harvest or post-harvest) of its sugar cane fields.
- 3.02.17 Burning may only be considered after exhausting all options for managing the sugarcane fields. If this becomes a necessity, the developer shall provide a technical justification for the Department's review and vetting.
- 3.02.18 Developer should be cognizant that there is a risk of transmitting disease and weeds due to the use of harvesters, as such the developer will take such steps to mitigate these risks as are typically consistent with Global GAP.

3.03 ENERGY AND FUELS

- 3.03.1 Energy supply for administrative facilities will be provided by means interconnecting to Belize Electricity Limited (BEL) main grid. As a means of back-up energy supply, the Developer may install multiple large (200KVA+) generator sets. These must be located in a contained area within a properly ventilated structure that provides for noise attenuation to comply with the prescribed standards for Structure C of the Second Schedule of the Pollution Regulations, Revised Edition 2003 and its amendments.
- 3.03.2 Fuel and oil storage will comply with the guidelines established by the Department of the Environment and the National Fire Service. The storage of LPG must be separate from other fuel sources.
- 3.03.3 All fuel storage tanks (except LPG) will be sited within containment bunds and in areas that will allow for easy access by service vehicles. The containment bunds must be equipped with an oil-water separator with a shut off valve. No pipe should pass through the walls of the containment bund. The containment bund must be constructed to have a holding capacity of 110% of the largest tank.

- 3.03.4 Proper measures will be taken in order to avoid fuel and oil spills. Fuel lines will be piped to their destinations using the least number of elbows, sleeves and couplings as reasonably possible in order to prevent leaks. The fuel lines must be in compliance with US API 650 Code, and comply with the Department of the Environment guidelines for above-ground fuel storage tanks.
- 3.03.5 All fuels spills of 20 gallons or more inside containment bond; 10 gallons outside the containment bond and any spill that comes in contact with any drainage system must be immediately contained and clean up and the matter be reported to the Department. In addition, the Developer must submit quarterly reports on all other spills exceeding 5 gallons.
- 3.03.6 A fire cart should be located in the immediate vicinity of the fuel storage area.
- 3.03.7 LPG storage tanks, if they are to be used, must comply with national prescribed standards.
- 3.03.8 All waste oil generated by operations of the facility shall be deemed to be hazardous waste. As such, all waste oil will be stored in sealed containers located in a containment bund in a sheltered area for subsequent collection and recycling by DOE certified personnel with a valid waste oil collection permit.

3.04 WATER RESOURCES

- 3.04.1 Freshwater supply for potable domestic use will be from Belize Water Services Limited supply source in the area whenever reasonably possible.
- 3.04.2 Freshwater supply for irrigation purpose will be provided by a combination of recycling of surface run-off captured in retention/sedimentation ponds, supplemented by ground water supply and lastly by abstraction from the Belize River.
- 3.04.3 Prior to conducting any groundwater abstraction, the Developer must conduct a proper pump test of the aquifer by a duly qualified hydrologist or recognized well drilling company having the required capacity. Well drilling results, along with the well logs, should be submitted to the Department of the Environment, which shall treat such information as being strictly confidential.
- 3.04.4 Should water supply be required from the Belize River, the Developer must submit to the DOE, for vetting and approval, which submission will be diligently and timely addressed by the DOE, a water abstraction program, inclusive of proof of access to the Belize River, specific location of abstraction point, estimated volumes of water to be abstracted and methodology to be used for water abstraction. The canalization to divert water from the Belize River shall not be permitted.
- 3.04.5 The Developer shall apply and obtain a Water Abstraction License from the Ministry of Natural Resources and comply will all conditions stated therein.

3.04.6 Developer will develop and implement a Water Quality Monitoring Programme for surface and groundwater sources, prior to undertaking any development activities. The programme shall include potential groundwater source, the Belize River and existing surface water bodies on the property. The parameters to be monitored will include, but not limited to: Dissolved Oxygen, Total Solids, Chemical Oxygen Demand, Chlorine, Sulphates, Phosphates, Total Nitrogen, Nitrates, Temperature, pH, Pesticides Residues (glyphosate, organophosphates) and Heavy Metals. The programmed must consist of at least three sample points along the Belize River, being at the western and eastern boundary of the property and one in between. Water quality testing will be done initially on a quarterly basis for the first year operation and results submitted to the DOE no later than one month after taking of the sample. The Developer will ensure that the results of its water quality monitoring programme are made available on-site or at its corporate offices at all times for inspection. Subsequently, the frequency of monitoring shall no less than annually.

3.05 WASTE TREATMENT/DISPOSAL

Agrochemical Waste

- 3.05.1 The Developer shall comply with the Crop Protection Product Packaging Recovery/Disposal Guidelines or established Guidelines of the Pesticides Control Board, for all containers of five (5) gallons and less, and paper sacks.
- 3.05.2 Agrochemical containers shall be tripled rinsed and resulting dilute solution returned to the sprayer and applied to crops. All triple rinsed containers will be labeled as "Used Pesticides Container" and be punctured and rendered unusable.
- 3.05.3 Used High Density Polyethylene (HDPE) and Polyethylene Terephthalate (PET) agrochemical containers of five (5) gallon or greater capacity may be recycled for reuse. However, these must not be used for food or water for humans or animals, or in places where contact with food and water could occur.
- 3.05.4 To avoid dangers of labeling mix-ups and reactions between chemicals, it is important that pesticide containers are not filled with another pesticide.

Domestic Solid Waste

- 3.05.5 The Developer shall be responsible to properly collect, transport and dispose of all domestic solid waste generated on site.
- 3.05.6 Garbage receptacles will be strategically located through the administrative facilities. These will be lined and kept covered at all times for subsequent collection.
- 3.05.7 The Developer will encourage reuse and composting of organic wastes and the separation of garbage at source into plastics, aluminum cans, paper, and glass.

Liquid Waste Disposal

- 3.05.8 Sewage waste disposal will be by means of suitably sized sealed, steel floated, multichambered septic tanks equipped with adequately designed drain fields. These systems must be installed in areas of stable soils that are nearly level, well drained, and permeable, with enough separation between the drain field and the groundwater table or other receiving waters.
- 3.05.9 All grey water from offices, administrative buildings, will be treated via properly constructed drain fields.
- 3.05.10 Special care must be taken in order to avoid contamination of the surface and ground water, and the surrounding environment. In order for this to take place, the following measures will be taken:
 - a. Grease and oils shall not be disposed of into any drain, as this could be a potential source of soil and water contamination. Grease traps are to be installed on each kitchen sink and maintained on a regular basis.
 - b. Chemical wastes (such as paints, thinners, acids, used oil, etc.) will be stored in watertight containers for subsequent disposal at a designated site.

3.06 INFRASTRUCTURE, ROADS AND DRAINAGE

- 3.06.1 The Developer shall obtain approval from the Central Building Authority for the construction of any building/structure.
- 3.06.2 All roads, walkway, footpaths and drainage structures must be designed and constructed in accordance with Ministry of Works Standards, provided said standards are published and reasonably available on a timely basis, and in such a manner as to reasonably minimize erosion and disruption of natural drainage. Primary roads will be designed to have a 40 foot right of way and secondary roads to have a right of way of 20 feet.
- 3.06.3 The Developer shall construct adequate road shoulders approaching the entrance from the George Price Highway to allow for proper visibility to traffic from both directions. The final designs, inclusive of any bus stop and road signs, if any, must be as approved by the Ministry of Works.
- 3.06.4 Household drainage pipes should not empty directly into any public drain system or any other water resource and surrounding environment. Instead it should lead to leach fields.

3.07 NOISE AND AIR QUALITY

- 3.07.1 The Developer shall ensure that all machinery and vehicles associated with the construction phase are regularly maintained and that maintenance of these vehicles is always conducted in stipulated areas, to the extent possible. Only properly functioning machinery shall be used, to reduce the risks of oils and lubricant spills/leaks, as well as to reduce noise and air emissions.
- 3.07.2 Heavy equipment and/or machinery should not be left idling for prolong period of time, so as to reduce emissions and mitigate noise pollution.
- 3.07.3 Field preparation should not be done during gusty wind conditions so as to prevent being a nuisance to adjacent property owners.

3.08 DECOMISSIONING AND REHABILITATION OF THE SITE

3.08.1 Should the Developer intend to convert to other land use, a decommissioning and rehabilitation plan must be developed and submitted to the Department for approval. This plan should address amongst other issues, health and safety of employees, debris and solid waste management, management of hazardous waste, and landscaping of the area.

3.09 CULTURAL AND SOCIAL ISSUES

- 3.09.1 If mounds, clay works or other artifacts of likely historical importance are found during land clearing, the articles will be left and work in the immediate area will be halted immediately and the Institute of Archaeology will be contacted to determine the potential importance and the recommended action.
- 3.09.2 As long as there are qualified and available Belizean workers, no labor force will be imported. If this labor force is not sufficient, then only foreigners with a valid Belize work permit will be employed. Developer will use reasonable efforts to establish a training program for Belizean workers wherein these specific skilled labors.
- 3.09.3 Security guards will be hired, if necessary, to minimize the need for additional police services.
- 3.09.4 All safety and health measures specifically provided for by law will be observed for all workers. Potable water and proper rest-room facilities will be provided during all activities. Employees will be trained in basic first aid, and relevant staff trained in CPR.
- 3.09.5 On site housing may be provided for administrative and field personnel. Housing area is to be sited outside of any Export Processing Zone and in an area where it will not pose any unwarranted health risks to employees.

3.10 DISASTER MITIGATION

- 3.10.1 Developer shall develop and submit to the Department of the Environment an Environmental Risk and Emergency Management Plan. This plan must incorporate safety measures for the following:
 - i. Action Plan for the protection of biodiversity and ecosystem functions;
 - ii. Safeguard for agrochemical use;
 - iii. Food safety;
 - iv. Employee safety measures;
- 3.10.2 The Developer shall ensure that its Hurricane Preparedness Plan is in conformity with the requirements of the National Emergency Management Organization and that its employees are duly familiarized with this plan to ensure its effective and efficient implementation, when applicable.

4.0 ENFORCEMENT AND MONITORING

- 4.01.1. The implementation of this Environmental Compliance Plan shall be the direct responsibility of Developer and/or its servants, assigns and contractors. The Department of the Environment in conjunction with other relevant agencies shall carry out compliance monitoring to ensure that this Compliance Plan is being adhered to.
- 4.01.2. During development, measures taken to mitigate negative environmental impacts shall be reviewed to assure compliance with the objectives of the plan. As development continues, the adequacy of mitigation measures shall be assessed and where necessary revised in consultation with the Developer.
- 4.01.3. Developer shall appoint an on-site liaison person responsible for environmental protection in work areas for distributing of information pertaining to environmental protection, chemicals management, etc. to its employees and/or contractors and for reporting to the DOE on environmental activities.
- 4.01.4. To ensure that compliance monitoring is conducted by the Department with respect to this environmental compliance plan and to assist in defraying expenses associated with monitoring by the Department, the Developer, its servants or agents, contractor(s), or assigns will pay an annual environmental monitoring fee of ten thousand dollars (BZD 10,000) for the first three years of operations beginning in 2013, and an annual monitoring fee of five thousand dollars (BZD 5,000) for the following years, beginning in 2016, to the Department of the Environment/Government of Belize. The Department of the Environment shall invoice the Developer annually in arrears for said payment.

4.02 REPORTING REQUIREMENTS

4.02.1. The Developer shall use its reasonable efforts to comply with all of the reporting requirements specified in this Environmental Compliance Plan.

- 4.02.2. The Developer will include in its operating procedures periodic internal management meetings that will inter alia discuss any environmental considerations.
- 4.02.3. Updated licenses and permits for all relevant activities will be kept at all times. The Developer will assist, subject to reasonable and timely prior notice by duly authorized officers in the performance of their duties during site inspections, which are solely in connection with the project's agricultural activities.
- 4.02.4. It is the responsibility of the Developer to immediately report any activity that has the potential to negatively impact or may damage the environment, whether accidentally or intentionally, to the Department of the Environment and all other relevant agencies.

4.03 POST DEVELOPMENT REVIEW

- 4.03.1. Additional monitoring is the responsibility of relevant government agencies to ensure that the various pollution control features and facilities installed are functioning and maintained properly.
- 4.03.2. As previously mentioned, wanton disregard for the conditions agreed upon in this document may result in the revocation of all permits and licenses issued for the implementation of this project and in the imposition of administrative and/or legal penalties.

Developer herein agrees to comply with this Environmental Compliance Plan (ECP) and to commence operation of this project within one year from the date of signing this ECP. If this project does not commence within one year from the date of signing this ECP, this document will be null and void. Should this happen, the Developer will need to re-apply for Environmental Clearance and a new plan may be prepared.

SIGNED on behalf of BELIZE SUSTAINABLE AGRICULTURE LIMITED) DIRECTOR) $\sqrt{\alpha}$, am the attesting witness to the due execution of the said instrument and the signature hereto subscribed as that of such attesting witness is in proper handwriting of the said deponent. Sworn at the Department of the Environment, Belmopan, the 20 day of March , 2019. SIGNED on behalf of the DEPARTMENT OF THE ENVIRONMENT CHIEF ENVIRONMENTAL OFFICER I, Ado Carsino, am the attesting witness to the due execution of the said instrument and the signature hereto subscribed as that of such attesting witness is in proper handwriting of the said deponent. Sworn at the Department of the Environment, Belmopan, the 22 day of March, 2019.