



July 2013

INTERNATIONAL CYANIDE MANAGEMENT CODE

Allship Logistics Limited Transportation Recertification Audit - Summary Report

Submitted to:

International Cyanide Management Institute (ICMI)
1400 I Street, NW – Suite 550
Washington, DC 20005
UNITED STATES OF AMERICA

Allship Logistics Limited
Head Office (Tema)
Heavy Industrial Area, Opposite Tema
Lube Oil
P.O. Box BT 582
Tema, GHANA

REPORT

Report Number. 137648004-003-R-Rev0

Distribution:

- 1 Copy - ICMI (+1 Electronic)
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APPENDIX A

Limitations



1.0 INTRODUCTION

1.1 Operational Information

Name of Transportation Facility: Allship Logistics Limited
Name of Facility Owner: Not Applicable
Name of Facility Operator: Allship Logistics Limited
Name of Responsible Manager: Robert Kingsford Kutin
Address: Allship Logistics Limited
Head Office (Tema)
Heavy Industrial Area, Opposite
Tema
Lube Oil
P.O. Box BT 582
State/Province: Tema
Country: Ghana
Telephone: +233 303 202362
Fax: +233 303 206482
Email: Kutin@all-ship.com

1.2 Description of Operation

1.2.1 Allship Logistics Limited

Allship is a wholly owned Ghanaian entity that was established in 1990 to provide freight forwarding and logistics services. The Company's head office is located in Tema, with branches in Accra, Takoradi, Tarkwa, Paga and Burkina Faso.

Since the establishment of the company it has provided services to companies in the mining, heavy industrialised sectors, government organisations as well as private organisations.

Allship has a 1.8 hectare (ha) truck yard and 3.4 ha warehouse facility at its Head office in Tema. It also has a 0.8 ha truck yard and a 0.5 ha warehouse facility at its branch office in Takoradi.

Allship Logistics Limited is a Network Partner with UTI, a worldwide Freight Forwarding and Logistics Company operating a network of over 400 offices in 128 countries worldwide.

1.2.2 Road Transportation

Allship transport cyanide manufactured by Orica Australia Pty Limited (Orica) and TaeKwang Industrial Company (TaeKwang), who are Code certified producers. The cyanide (solid) is packaged into intermediate bulk containers (IBCs), which are in turn packed into a freight (shipping) container to be transported by sea to the Ports of Tema and Takoradi, Ghana. A maximum of 20 IBCs are packed into a freight container with a maximum gross weight of 28 tonnes. Before arrival, Allship ensures that the shipping documentation is in order and the goods are cleared to allow prompt handling of the product through the Ports. Upon arrival at the Ports, the offloading of all containers is performed by the Port stevedores. Allship collects the containers and transport them to customer mine sites using the following routes:

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- Port of Tema – Accra – Yamoransa - Goldfields Tarkwa Mine
- Port of Takoradi – Nseum – Agona – Bonsaso - Goldfields Tarkwa Mine
- Port of Takoradi – Nseum – Agona – Bonsaso – Domang Mine.

1.2.3 Transit Storage

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol.

Storage in transit will occur at the Ports of Tema and Takoradi while formalities such as customs clearance are performed. Once formalities are complete, the cyanide containers will be collected and transported to customer mine sites or the warehouse. At no points, other than at customs, the warehouse or customer mine sites are the containers removed from the trucks or stored in one place for any length of time greater than a couple of hours.

1.3 Auditors Findings and Attestation

in full compliance with

Allship Logistics

The International Cyanide Management Code

is:

in substantial compliance with

not in compliance with

Audit Company: Golder Associates Pty Ltd

Audit Team Leader: Russell Beazley, CEnvP (418), RABQSA (109258)

Email: rbeazley@golder.com.au

Name and Signatures of Other Auditors:

Name	Position	Signature	Date
Russell Beazley	Lead Auditor	<i>R. Beazley</i>	10 July 2013
Tom Carmichael	Technical Specialist	<i>T. Carmichael</i>	10 July 2013

Dates of Audit

The Allship Logistics Limited Transport Recertification Audit was undertaken over three days (six person-days) between 4 and 6 March 2013.

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.

Allship Logistics
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R. Beazley
Signature of Lead Auditor

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Date





ALLSHIPS LOGISTICS LIMITED - SUMMARY REPORT

I attest that this Summary Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

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2.0 TRANSPORTER SUMMARY

2.1 Principle 1 – Transport

Transport Cyanide in a manner that minimises the potential for accidents and releases.

2.1.1 Transport Practice 1.1

Select cyanide transport routes to minimise the potential for accidents and releases.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Allship is in FULL COMPLIANCE with Transport Practice 1.1 requiring cyanide transport routes to be selected to minimise the potential for accidents and releases.

Allship has developed and implemented a *Route Selection Procedure* to guide the selection of transport routes to minimise the potential for accidents and releases or the potential impacts of accidents and releases. The procedure prompts the persons undertaking the survey to consider a number of hazards including population density, infrastructure construction and condition, pitch and grade and prevalence and proximity of water bodies and fog.

Hazards identified during the route assessment and selection process are risk assessed using the method outlined in the *Route Selection Procedure*. Once assessed, the *Route Selection Procedure* then guides the development of prevention and/or protective measures which mitigate risks. The *Route Selection Procedure* requires the resulting management measures to be documented within a Transport Management Plan (TMP). Allship has developed a TMP for all proposed routes to cyanide transport customers.

Allship has a process for providing feedback on route conditions during the journey and after each convoy. Upon returning to the Allship Tema Depot the Convoy Leader and Drivers attend a meeting to discuss the journey and complete the *Journey Feedback Form*. All attendees are required to sign the *Journey Feedback Form* acknowledging attendance at the meeting and that they understanding the issues discussed.

Additionally, Allship undertakes periodic route surveys.

Allship seeks input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures. Whilst Allship went through a selection and risk assessment process, there is only one possible transportation route. This route was approved for use for the transportation of cyanide by the Ghana Environmental Protection Agency (EPA). The TMP was issued in 2009 to identified stakeholders, including regulatory bodies and emergency services. Further issuances were not deemed necessary by Allship as the route has not changed nor the identified risk management practices.

Despite this, the EPA is consulted on an annual basis through the issuance by the EPA of an annual licence for the Hazardous Chemicals Transport. This licence includes the transportation of cyanide along the approved route.

Direct engagement of communities by Allship did not occur as the communities are not designated a role in emergency response and the EPA is mandated to consult with the community on the issue of cyanide transport.

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In addition to convoys, security measures are implemented including the use of locked and sealed containers, and constant monitoring of the progress of the convoy along the route using a GPS tracking system and a convoy escort.

Allship has advised external responders, medical facilities of their roles during an emergency response. The *Route Selection Review* procedure requires the TMP to be issued to the stakeholders for comment. This occurred in 2009 and the route has not changed since. The Allship Safety Supervisor indicated that, as the routes have not changed since the original issuance of the TMP and there has been no material change to the TMP, Allship has deemed that further issuance is not required. A review of the current and previous TMP by the Auditor supports this assertion.

Allship does not subcontract any of its cyanide transport operations within the scope of this audit.

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2.1.2 Transport Practice 1.2

Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

The operation is in full compliance with **Transport Practice 1.2**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Allship is in FULL COMPLIANCE with Transport Practice 1.2 requiring personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

Allship only uses trained and competent operators to drive its trucks. Prior to employment, drivers undergo licence and reference checks and an assessment of their driving competence and attitude. Once employed, drivers receive Defensive Driving, First Aid, Basic Fire Fighting, Hazardous Material Handling and Emergency Response.

In addition, drivers undergo annual Cyanide Awareness Training, which includes elements such as packaging and transport, chemical properties, first aid and toxicology, responsibilities and emergency response.

A review of the training records indicated that the aforementioned training was being conducted as appropriate.

Allship does not subcontract any of its cyanide transport operations within the scope of this audit.

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2.1.3 Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

The operation is in full compliance with **Transport Practice 1.3**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Allship is in FULL COMPLIANCE with Transport Practice 1.3 requiring that transport equipment is suitable for the cyanide shipment.

Allship only uses equipment designed and maintained to operate within the loads it will be handling when transporting cyanide. Within Ghana, prime movers and trailers are registered as a single unit. Allship has ten prime movers with single axle trailers dedicated to transporting cyanide. These dedicated vehicles are only capable of being loaded with one shipping container loaded with cyanide.

Allship has implemented a maintenance programme that is based on 10 000 km intervals. Vehicles fitted with a driver information module indicate whenever a service is due. Vehicles without these modules have their kilometres tracked via the speedometer. The Transport Officer and Drivers track the mileage of the vehicles and report to the Maintenance Supervisor when a service is due. The 10 000 km service sheet includes checks on the structural integrity of the prime mover and trailer.

In addition to the scheduled maintenance, the Convoy Leader and Drivers conduct an inspection of all prime movers and trailers prior to departure. These checks and the maintenance programme are used to verify the adequacy of the equipment for the load it must bear.

Procedures are in place to prevent overloading of the transport vehicle being used for handling cyanide. All vehicles must be weighed at a weighbridge at the Ports of Tema and Takoradi by the Ghana Highways Authority at a permanent weigh station prior to leaving. If the vehicles exceed the allowable maximum gross weight, they will not be allowed to leave. In addition to this, there are a number of mandatory weighbridges along the transport routes that the vehicles must pull into. If the vehicles are overloaded, the company will be fined by the Authority.

Allship does not subcontract any of its cyanide transport operations within the scope of this audit.

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2.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Allship is in FULL COMPLIANCE with Transport Practice 1.4 requiring the operation develop and implement a safety programme for transport of cyanide.

Allship has procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging. This includes checking for damage to the containers and seals, cross referencing the seal numbers with the shipping documents, inspection of placarding and checking of container twist locks prior to departure and during delivery.

Placards are used to identify the shipment as cyanide, as required by international standards. Consignments of cyanide, originating from TaeKwang and Orica, to be transported by Allship arrive in Ghana via the Ports of Takoradi and Tema. Orica and TaeKwang are Code certified cyanide producers. As such, these producers have systems in place to ensure its containers are labelled in accordance with the International Maritime Dangerous Goods (IMDG) Code and as required by local regulations or international standards.

Allship has implemented a safety programme for cyanide transport that includes the following:

- Vehicle inspections by the Driver and Convoy leader prior to departure and during delivery.
- A preventative maintenance programme that is based on 10 000 km intervals. Vehicles fitted with a driver information module indicate whenever a service is due. Vehicles without these modules have their kilometres tracked via the speedometer. The Transport Officer and Drivers track the mileage of the vehicles and report to the Maintenance Supervisor when a service is due.
- A *Fatigue Management Policy* that limits driver hours and mandates rest periods. Driving hours are tracked via a GPS system and through the payroll system.
- Procedures to prevent loads from shifting, including the use of specifically designed container twist locks. These locks are checked periodically throughout a delivery.
- Procedures to suspend operations for inclement weather or problems on the route.
- A *Drug and Alcohol Procedure* that details the organisation's awareness programme and notes the circumstances that testing may be carried out.

Records for the elements of the safety programme have been retained by Allship and were inspected by the Auditor. Due to the confidential nature of drug and alcohol tests, these records were not sought.

Allship does not subcontract any of its cyanide transport operations within the scope of this audit.

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2.1.5 Transport Practice 1.5

Standard of Practice 1.5 requiring the operation to follow international standards for transportation of cyanide by sea and air is NOT APPLICABLE to Allship.

Allship does not transport consignments of cyanide by sea or air within the scope of this audit. Consignments of cyanide proposed to be transported by Allship will arrived in Ghana via the Ports of Takoradi and Tema and originate from the Orica and TaeKwang Code certified production facilities. As such, these producers have systems in place to ensure its containers are labelled in accordance with the IMDG Code and as required by local regulations or international standards.

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2.1.6 Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.6

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Allship is in FULL COMPLIANCE with Transport Practice 1.6 requiring the operation track cyanide shipments to prevent losses during transport.

Allship vehicles have means to communicate with the Allship Tema Depot, the mining operation, the cyanide producer and emergency responders. During a delivery the convoy uses cell phones and GPS tracking to maintain contact within the convoy and to external parties. Communication between Allship and the supplier is via the Allship Logistics Manager at the Tema Depot.

Communication equipment is tested to ensure it functions properly either periodically or through continuous means. A GPS tracking system has been installed in all dedicated cyanide transport vehicles. This system is tested via continuous use. The Safety Supervisor stated that all mobile phones are tested prior to departure. This is documented in the Pre-trip Vehicle Checklists.

There are no communication blackout areas along the routes. Cell phones have 100% coverage along the routes and GPS tracking is available on some vehicles.

The GPS tracking system is used to track the progress of cyanide shipments. Upon returning to the Allship Tema Depot the Convoy Leader, Drivers and Driver Mates attend a meeting at the conference room to discuss the journey and complete the Journey Feedback Form.

Allship has implemented inventory controls and/or chain of custody documentation to prevent loss of cyanide during shipment when it commences cyanide transportation activities. This is achieved through the use of waybills, which are created based on the shipping documentation for each container and accompany the container throughout delivery. The waybill is signed by the Allship Delivery Clerk, Driver and customer representative upon receipt. Upon signing, the customer representative is acknowledging that the consignment was received in good condition and unopened.

Allship maintains records that indicate the amount of cyanide in transit when it commences cyanide transportation activities. This is achieved through the creation of a waybill for each container, which is based on the information provided in the shipping documentation. The waybills include a description of the goods, including container details and weights.

Material Safety Data Sheets are also available during transport. This is can be found at the back of the Emergency Response Plan, which is carried in each vehicle within the convoy.

Allship does not subcontract any of its cyanide transport operations within the scope of this audit.

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2.2 Principle 2 – Interim Storage

Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures.

2.2.1 Transport Practice 2.1

Store cyanide in a manner that minimises the potential for accidental releases.

Transport Practice 2.1 requiring transporters design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures is NOT APPLICABLE to Allship.

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. Storage may occur at the Ports of Takoradi and Tema while formalities such as customs clearance and carrier releases are performed. Once formalities are complete, it is proposed that the cyanide containers are collected from the Ports of Takoradi and Tema and taken in convoy to either the mine site or the Allship warehouse in Dompim which is the subject of a separate ICMC audit.

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2.3 Principle 3 – Emergency Response

Protect communities and the environment through the development of emergency response strategies and capabilities.

2.3.1 Transport Practice 3.1

Prepare detailed Emergency Response Plans for potential cyanide releases.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Allship is in FULL COMPLIANCE with Transport Practice 3.1 requiring the operation prepare detailed Emergency Response Plans for potential cyanide releases.

Allship has developed an Emergency Response Plan (ERP) and TMP that guides responses to potential cyanide emergencies. The ERP and TMP are specific to the transportation routes used by Allship.

Section 2.1 of the ERP identifies the following potential scenarios:

- Rollover of container with spill
- Rollover of container without spill
- Spillage into waterways

The route risks assessment process has been used by Allship to develop the TMP and ERP. The documents appear to be applicable to the management of an emergency involving the transport of sodium cyanide by Allship. It is considered applicable for product spillages along the transport routes.

The TMP and ERP consider both the physical and chemical form of cyanide. The ERP outlines the handling hazards and precautions associated with handling solid and liquid sodium cyanide and when dealing with hydrogen cyanide gas. The TMP details the properties of the product transported by Allship as well as the poisoning routes and exposure limits.

Both documents have the material safety data sheet for solid sodium cyanide as an appendix.

The plans do consider the method of transport. The ERP is designed for the response to potential scenarios that have been identified during the route risk assessment process.

The TMP is developed around road transportation of sodium cyanide and includes:

- Container design information
- Procedures for receiving product at Ports and transport to mine sites
- Steps in the event of a road transportation incident.

The plans consider all aspects of the transport infrastructure. Allship has undertaken route risk assessment that details the relevant transport infrastructure.

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The TMP considers the design of the transport vehicle. Section 2.2 of the TMP outlines container security and design information including:

- The use of twist locks to secure containers during road transport.
- The use of a security seal on each container during transport.
- Placarding of the transport vehicles.

The ERP includes a description of the sequence of events for an incident during road transport. In addition, specific response actions per position (internal and external to Allship) for the identified potential scenarios have been developed.

The ERP identifies the roles of outside responders and medical facilities in the event of an emergency. Section 2.5.1 outlines the roles and responsibilities for internal and external stakeholders in the event of an emergency. External stakeholders include emergency response organisations and government authorities/departments. Emergency contact numbers for internal and external entities are provided as appendices in both the ERP and TMP.

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2.3.2 Transport Practice 3.2

Designate appropriate response personnel and commit necessary resources for emergency response.

The operation is [X] in full compliance with [] in substantial compliance with [] not in compliance with Transport Practice 3.2

Summarise the basis for this Finding/Deficiencies Identified:

Allship is in FULL COMPLIANCE with Transport Practice 3.2 requiring they designate appropriate response personnel and commit necessary resources for emergency response.

Allship provides emergency response training of appropriate personnel. Allship has developed and implemented a training scheme for its Drivers and Escorts. Required training includes:

- Defensive driving
First aid
Basic fire fighting
Hazardous materials and general materials handling
Emergency response.

The emergency response training (both theory and practical) is included in the annual cyanide training given to all Drivers and escorts. A review of the training records confirmed that all escort staff and Drivers had completed the required training.

Descriptions of the specific emergency response duties and responsibilities for internal personnel and external entities are detailed in the ERP. Additionally, steps to be undertaken by the Safety Officer/ Escort Coordinator and Convoy Team are detailed in the TMP.

Allship maintains a list of all its emergency response equipment that should be available during the transport route. The quantity and condition of the equipment is checked as part of the pre-departure checklist.

The quantity and condition of the equipment is checked as part of the pre-departure checklist. During the audit inspection, questions were asked if the responsible parties knew how to use the emergency response equipment and visual inspections were made of some of the equipment. The Escort Team knew which equipment was to be used during a spill and how to use their PPE correctly. A visual inspection was also made of the coveralls and respirators, which appeared to be appropriate for the emergencies to be encountered.

Allship provide initial and periodic refresher training in emergency response procedures including implementation of the ERP and TMP. Emergency response training, which includes mock drills, is provided annually. A review of the training matrix indicates that this is occurring.

Allship does not subcontract any of its cyanide transport operations within the scope of this audit.

Allship Logistics Name of Facility R. Beazley Signature of Lead Auditor 10 July 2013 Date



2.3.3 Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

The operation is in full compliance with **Transport Practice 3.3**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Allship is in FULL COMPLIANCE with Transport Practice 3.3 requiring that they develop procedures for internal and external emergency notification and reporting.

The ERP contains procedures and current contact information for notifying outside response providers, and medical facilities of an emergency. The ERP contains an emergency contact flow chart and emergency contact details for internal and external entities, including Allship personnel, customer mine sites, cyanide producers and government authorities/departments.

Systems are in place to ensure that internal and external emergency notification and reporting procedures are kept current. The ERP, including contacts is reviewed annually.

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2.3.4 Transport Practice 3.4

Develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Allship is in FULL COMPLIANCE with Transport Practice 3.4 requiring that they develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

Allship has procedures for remediation, which are covered in the ERP. These procedures include neutralisation of soil and water using ferrous sulfate and the removal of the contaminated media.

Allship prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water. This is communicated to Drivers and the Escort team personnel in the annual Cyanide Awareness Training. The ERP also states a warning prohibiting the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water.

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2.3.5 Transport Practice 3.5

Periodically evaluate response procedures and capabilities and revise them as needed.

The operation is in full compliance with **Transport Practice 3.5**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Allship is in FULL COMPLIANCE with Transport Practice 3.5 requiring the operation periodically evaluate response procedures and capabilities and revise them as needed.

There provisions for periodically reviewing and evaluating the adequacy and performance of the ERP. Section 5 of the ERP states that the:

... function and structure of the Allship Logistics ERP for the transport of hazardous chemical substances is reviewed annually to ensure its effectiveness.

In case of any transportation incident and an investigation report issued, the company will review and revise the Emergency Response Plans and Procedures. Also, the ERP will be reviewed when necessary based on findings from yearly mock drills conducted by Allship Logistics Ltd.

Post field phase, the Auditor received an updated copy of the ERP, which had been reviewed by Allship as part of their annual commitment to periodically evaluate their ERP.

Allship has provisions for periodically conduction mock emergency drills. Table 2 within the TMP outlines the training programme for Allship personnel. This includes annual Cyanide Emergency Response Scenario Training, which is to be conducted in conjunction with the annual Cyanide Awareness training.

Evidence, in the form of Mock Drill Reports, was supplied indicating that mock drills had been undertaken, as per the commitment, for the 2010, 2011 and 2012 operational years.

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3.0 LIMITATIONS

Your attention is drawn to the document - "Limitations", which is included as Appendix A to this report. This document is intended to assist you in ensuring that your expectations of this report are realistic, and that you understand the inherent limitations of a report of this nature. If you are uncertain as to whether this report is appropriate for any particular purpose please discuss this issue with us.

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Report Signature Page

GOLDER ASSOCIATES PTY LTD

Russell Beazley
ICMI Lead Auditor

Tom Carmichael
ICMI Transport Technical Specialist

RJB/EWC/slj

A.B.N. 64 006 107 857

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APPENDIX A

Limitations



LIMITATIONS

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South America	+ 55 21 3095 9500

solutions@golder.com
www.golder.com

**Golder Associates Pty Ltd
Level 3, 1 Havelock Street
West Perth, Western Australia 6005
Australia
T: +61 8 9213 7600**

