



November 2016

**INTERNATIONAL CYANIDE
MANAGEMENT CODE**

**Allship Logistics Limited
Production Warehouse
Recertification Audit,
Summary Audit 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
PO Box BT 582
Tema, GHANA

Submitted to:

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Distribution:

Electronic Copy – Allship Logistics
Electronic Copy – Golder Associates Pty Ltd

REPORT





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APPENDICES

APPENDIX A

Important Information



1.0 INTRODUCTION

1.1 Operational Information

Name of Production Facility:	Allship Logistics Limited
Name of Facility Owner:	Allship Logistics Limited
Name of Facility Operator:	Allship Logistics Limited
Name of Responsible Manager:	Robert Kutin
Address:	Allship Logistics Limited Head Office (Tema) Heavy Industrial Area, Opposite Tema Lube Oil PO Box BT 582
State/Province:	Tema
Country:	Ghana
Telephone:	0303-205627 or 37
Fax:	0303-206482
Email:	Robkutin@hotmail.com

1.2 Audit Scope

The scope of this audit covers the warehousing of cyanide at Allship's warehouse located at Dompim near Tarkwa, Ghana.

1.3 Description of Operations

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 Röhlig-Grindrod (Pty) Ltd, which is an airfreight, seafreight and project logistics service provider situated in sub-Saharan Africa, operating internationally and into Africa.

1.4 Cyanide Warehousing

Allship's cyanide storage warehouse is located at Tarkwa Road, Dompim, a town of approximately 10 000 people, approximately 30 km south-west of Tarkwa. Most cyanide is delivered by ship to the port at Takoradi. Some cyanide is delivered via Tema port.

Allship designed and arranged the construction of the warehouse in 2010. The Ghanaian Environmental Protection Authority granted authorisation on 28 December 2011 to commence the construction and operation of the sodium cyanide warehouse. The warehouse comprises two storage areas, separated by a wall. One area is used only for storage of cyanide.

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The warehouse is used for the storage of cyanide en-route from the port at Takoradi or Tema to the mine site. The cyanide is packaged in one tonne polypropylene lined timber boxes, which are unloaded from the shipping containers at the warehouse and stored, on the concrete floor, in the warehouse until required by the mine site. Upon request by the mine site, the cyanide boxes are removed from the warehouse using a forklift and packed into a shipping container, locked and sealed for transport to the mine site.

The warehouse has a capacity of 2000 one-tonne boxes of cyanide.

The warehouse is secured and has a manned presence on the site 24 hours per day, seven days per week.

No cyanide was present within the warehouse at the time of the audit.

1.5 Auditors Findings and Attestation

in full compliance with

**The International
Cyanide Management
Code**

**Allship Logistics’
Warehouse is**

in substantial compliance with

not in compliance with

Audit Company: Golder Associates Pty Ltd

Audit Team Leader: Edward Clerk – Exemplar Global (105995)

Email: eclerk@golder.com.au

No significant cyanide exposures and releases were noted as occurring during the audit period.

Name and Signatures of Auditors:

Name	Position	Signature	Date
Edward Clerk	Lead Auditor and Technical Specialist		17 November 2016

1.6 Dates of Audit

The Recertification Audit of Allship Logistics Warehouse was undertaken between 4 and 6 May 2016.

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.

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 Cyanide Production Verification Protocol* and using standard and accepted practices for health, safety and environmental audits.

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2.0 CONSIGNOR SUMMARY

2.1 Principle 1 – Operations

Design, construct and operate cyanide production facilities to prevent release of cyanide

2.1.1 Production Practice 1.1

Design and construct cyanide production facilities consistent with sound, accepted engineering practices and quality control/quality assurance procedures.

in full compliance with

Allship Logistics is

in substantial compliance with

Production Practice 1.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Production Practice 1.1 requiring the operation design and construct cyanide production facilities consistent with sound, accepted engineering practices and quality control/quality assurance procedures.

Quality control and quality assurance programmes were referenced during the last Certification Audit. The warehouse facility has not been modified since the Certification Audit.

The EPA authorised the designs and construction of the warehouse and incineration facility. Allship further met the intent of the Code's quality control and quality assurance requirements through the assessment of the facility by a competent person.

The area where cyanide is handled within the warehouse has been paved with concrete to minimise seepage to the subsurface. The area outside the warehouse where cyanide is handled has been surfaced with road-base material compacted by a heavy roller to minimise infiltration.

The facility does not have any cyanide processes or storage vessels.

The facility does not have or require secondary containments as it does not handle liquids containing cyanide.

2.1.2 Production Practice 1.2

Develop and implement plans and procedures to operate cyanide production facilities in a manner that prevents accidental releases.

in full compliance with

Allship Logistics is

in substantial compliance with


Production Practice 1.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Production Practice 1.2 requiring the development and implementation of plans and procedures to operate cyanide production facilities in a manner that prevents accidental releases.

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The cyanide facility has procedures that describe the standard practices necessary for its safe and environmentally sound operation. The main procedures for operation of the warehouse are the Task Safety Analysis process and the Procedure for Loading and Unloading Cargo/Abnormal Cargo.

A Load Assessment Risk Form is completed at the warehouse prior to each unloading or loading activity.

The facility has procedures for contingencies during upsets in its activities that may result in cyanide exposures or releases. The Emergency Response Plan and Evacuation Procedures for Warehouse and Transport (ERP) addresses the management of spills.

The Allship Change Management Application Form details the risk assessment and approval process for changes undertaken at the site. HSE assessment is required for all changes assessed. No changes have occurred at the facility since the last Recertification Audit.

The operation has implemented preventative maintenance programmes and documented activities for equipment and devices necessary for cyanide production and operation. Maintenance on site is managed in accordance with the Allship Logistics Ltd Maintenance Procedure.

The warehouse is subject to a structured inspection programme.

The site does not have any chemical processes requiring monitoring.

The site does not generate cyanide-contaminated water and does not have secondary containment areas which may accumulate cyanide-contaminated water.

Waste packaging collected from mine site customers is managed by Allship. These materials are despatched to a waste contractor approved by the Ghanaian EPA for incineration. In the event of contaminated PPE or spilled cyanide, the material would be despatched to a waste contractor for incineration or would be decontaminated by rinsing with sodium hypochlorite.

Cyanide is stored only in 1 tonne timber boxes lined with polypropylene and polyvinyl chloride plastic bags. The boxes are stored in a locked warehouse building inside a secure compound, where public access is prohibited and rainwater ingress is prevented. The warehouse is ventilated.

Cyanide is packaged for transport in accordance with international standards for packing of solid cyanide and thereby meets the requirements of the political jurisdictions through which the loads will pass.

2.1.3 Production Practice 1.3

Inspect cyanide production facilities to ensure their integrity and prevent accidental releases.

in full compliance with

Allship Logistics is

in substantial compliance with

Production Practice 1.3


not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The Production Practice 1.3 requiring the inspection of cyanide production facilities to ensure their integrity and prevent accidental releases is NOT APPLICABLE to the facility.

The facility does not have any cyanide tanks, secondary containments, pipelines, pumps or valves or other liquid cyanide production facilities.

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2.2 Principle 2 – Worker Safety

Protect workers’ health and safety from exposure to cyanide

2.2.1 Production Practice 2.1

Develop and implement procedures to protect plant personnel from exposure to cyanide.

in full compliance with

Allship Logistics is

in substantial compliance with

Production Practice 2.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Production Practice 2.1 requiring the facility to develop and implement procedures to protect plant personnel from exposure to cyanide.

The site has developed operational procedures to minimise worker exposure during normal plant operations from receipt, storage and dispatch of cyanide containers. The key activities undertaken at the warehouse are the operation of forklifts and disposal of cyanide packaging materials and Allship has developed procedures covering these activities. The ERP addresses non-routine activities.

Maintenance on site is managed in accordance with the Allship Logistics Ltd Maintenance Procedure.

The Allship Change Management Application Form details the risk assessment and approval process for changes undertaken at the site. HSE assessment is required for all changes assessed. No changes have occurred at the facility since the last Recertification Audit.

The facility solicits and considers worker input in developing and evaluating health and safety procedures. Toolbox meetings are used as the primary mechanism to review procedures.

Allship advised that it undertakes monitoring of HCN concentrations in the warehouse. The warehouse has a HCN monitor which is calibrated. Calibration records were kept.


The cyanide facility has identified the following areas and activities where workers may be exposed to hydrogen cyanide gas and sodium cyanide dust at more than 4.7 parts per million (5 mg/m³), as cyanide:

- Loading and unloading containers
- Waste storage area.
- Decontamination zone.

The facility has the provisions to ensure that a buddy system is used or workers can otherwise notify or communicate with other personnel for assistance, help or aid where necessary. The ERP requires loading and off-loading of cyanide to be undertaken in the company of another cyanide trained worker.

The facility assesses the health of employees to determine their fitness to perform their specified tasks. Allship has a Drug and Alcohol Policy, which includes workplace testing for drugs and alcohol prior to employment and during employment (as unannounced alcohol testing) and following any worker being involved in an accident. Allship requires all employees to undergo pre-employment health checks.

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The facility has a clothing change procedure for employees, contractors and visitors to areas with the potential for contamination of clothing by cyanide during abnormal or emergency operations. A cloth change procedure is not required for normal warehouse operations.

Suitable warning signs advising workers that cyanide is present and that, if necessary, suitable personal protective equipment must be worn are present at the facility. All personnel are prohibited from smoking, eating and drinking, and having open flames in areas where there is the potential for cyanide contamination.

2.2.2 Production Practice 2.2

Develop and implement plans and procedures for rapid and effective response to cyanide exposure.

in full compliance with

Allship Logistics is

in substantial compliance with

Production Practice 2.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Production Practice 2.2 requiring the operation to develop and implement plans and procedures for rapid and effective response to cyanide exposure.

The facility has developed specific written emergency response plans and procedures to respond to cyanide exposures. These are documented within the Emergency Response Plan and Evacuation Procedures for Warehouse and Office Block (ERP).

The site has a safety shower and eyewash station, which is inspected and tested weekly to ensure it is in good order and operating effectively. Non-acidic fire extinguishers are located at the facility and these are inspected internally and by a third party. The facility's first aid equipment is also inspected regularly to assure it is available when needed.


The facility has water, oxygen, resuscitators, antidote and a means of communication or emergency notification readily available for use in the ERP. Water is provided at the office building adjacent to the warehouse. Hydroxocobalamine antidote is kept in the emergency response equipment. The antidote was in date. It is noted that hydroxocobalamine is required to be administered under the supervision of a medical doctor. The facility has oxygen and a resuscitator. The office building has telephones to enable communication with emergency personnel.

The facility's first aid equipment is inspected regularly to assure it is available when needed. The first-aid and emergency response equipment are stored within a plastic carry container in a timber box in the escort vehicle and in a cabinet at the office building adjacent to the warehouse building. The equipment on the escort vehicle is inspected as part of the equipment check list prior to each vehicle trip. The equipment at the office block is inspected weekly and/or anytime there is a cyanide delivery.

Material Safety Data Sheets (MSDS) are in English (the language of the workforce) and are available to workers at the warehouse site. The MSDS for Cyanide is kept in laminated form in the first aid equipment in the office. A copy of the MSDS is also in the ERP. First aid procedures are also detailed in the ERP and is also available to the workforce through training.

Containers for storage of cyanide are identified to alert workers of their contents.

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The facility has a decontamination procedure for employees, contractors and visitors leaving the areas with the potential for skin exposure to cyanide. Under normal operation, personnel at the warehouse site do not have potential for skin exposure to cyanide.

The site has its own on-site capability to provide first aid assistance to workers exposed to cyanide. The ERP Sodium Cyanide Safety Handling Guide addresses first aid measures for exposure to cyanide and employees are trained in first aid.


The facility has developed procedures to transport workers to locally available, qualified off-site medical facilities. Only decontaminated patients or patients not requiring decontamination are be transported to a medical facility. The Safety Officer will report the incident to the receiving medical facility, including the condition of the patient, treatment given and estimated time of arrival at the medical facility.

The facility has alerted local hospitals of the potential to treat patients for cyanide exposure, and the operation is confident that the medical facility has adequate, qualified staff, equipment and expertise to respond to cyanide exposure.

Emergency response training, which includes mock drills, is provided annually. Mock emergency drills are conducted periodically to test response procedures for various exposure scenarios, and the lessons learned from the drills are incorporated into emergency response planning.

A procedure is in place to investigate and evaluate cyanide exposure incidents to determine if the facility's programmes and procedures to protect worker health and safety and to response to cyanide exposures are adequate or need to be revised. Allship maintains an incident register. Records indicate that no incidents had been recorded for the warehouse.

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2.3 Principle 3 – Monitoring

Conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.

2.3.1 Production Practice 3.1

Conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.

Allship Logistics is in full compliance with **Production Practice 3.1**
 in substantial compliance with
 not in compliance with


Summarise the basis for this Finding/Deficiencies Identified:

Production Practice 3.1 requiring the facility to conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts is not applicable to the cyanide facility.

The facility does not have direct or indirect discharge to surface waters.

The site does not undertake monitoring as it does not generate atmospheric emissions and does not have a direct or indirect discharge to surface or groundwater.

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2.4 Principle 4 – Training

Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner

2.4.1 Production Practice 4.1

Train employees to operate the plan in a manner that minimises the potential for cyanide exposures and releases.

in full compliance with

Allship Logistics is

in substantial compliance with

Production Practice 4.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Production Practice 4.1 requiring employees to be trained to operate the ERP in a manner that minimises the potential for cyanide exposures and releases.

The facility trains workers to understand the hazards of cyanide and refresher training is conducted periodically. The ERP specifies the minimum qualification requirements and training for warehouse personnel. Refresher frequencies have been set for the courses.


The facility trains workers in the use of personal protective equipment and when and where this equipment is required. PPE training includes advice on how to properly wear particular PPE, when to wear it and what purpose it serves. The correct use of PPE Training is part of the annual cyanide awareness training provided to Allship personnel. Training in PPE use is also provided during the mock drill training.

Workers are trained to perform their normal production tasks with minimum risk to worker health and safety and in a manner that prevents unplanned cyanide releases specifically during departmental training and operational training where workers learn about specific tasks and hazards for the work they perform. All new staff undergo induction training to enable them to become aware of all procedures, including safety and warehouse operations.

Training elements necessary for each job function are identified in the training materials and training is provided by appropriately qualified personnel.

The facility evaluates the effectiveness of cyanide training by observation. Cyanide awareness, emergency response, and PPE training is provided by an external consultant. Attendees are assessed for competency in the training module. The Safety Officer uses a Behaviour Based Safety (BBS) Observation Checklists to record observations of safety practices.

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2.4.2 Production Practice 4.2

Train employees to respond to cyanide exposures and releases.

in full compliance with

Allship Logistics is

in substantial compliance with

Production Practice 4.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Production Practice 4.2 requiring employees to be trained to respond to cyanide exposures and releases.


Workers are trained during induction and annual training in procedures to be followed if a cyanide release is discovered and to respond to worker exposure to cyanide. A training matrix is kept which lists the names of all personnel according to their work function and the date of which they have undergone training.

Mock emergency drills are conducted annually to test response procedures for various exposure scenarios, and the lessons learned from the drills are incorporated into emergency response planning. Emergency drills are evaluated from a training aspect to determine if personnel have the knowledge and skills required for effective response, and training procedures are revised if deficiencies are identified.

Training records are retained throughout an individual's employment documenting the training they have received which including the name of the employee, the trainer, the date of training, the topics covered, and how the employee demonstrated an understanding of the training materials.

After mock drills the exercise is recorded and evaluated.

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2.5 Principle 5 – Emergency Response

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

2.5.1 Production Practice 5.1

Prepare detailed emergency response plans for potential cyanide releases.

in full compliance with

Allship Logistics is

in substantial compliance with

Production Practice 5.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Production Practice 5.1 requiring a detailed emergency response plan for potential cyanide releases.

The facility has an emergency response plan to address potential releases of cyanide that may occur.

The ERP considers potential failure scenarios appropriate for its site-specific environmental and operating circumstances, as applicable. It ERP considers four emergency scenarios:

- Container rollover – no product spill
- Container rollover – product spill
- Spill to water
- Spill of cyanide at the warehouse.


The ERP also provides information on other emergency events such as cyanide exposure, fires, severe weather and natural disasters, waste handling, earthquakes, civil disorder and armed confrontation, terrorist attack and power outages.

The cyanide facility does not undertake any dissolution operations, have any cyanide pipes, tanks or valves, nor does it have any cyanide ponds, tanks or waste treatment facilities.

The site has a backup generator which activates in the event of a failure of the mains power supply. Power is required to pump water on the site. Allship has a procedure for inspection of the back-up generator. A power failure or equipment failure cannot result in the release of cyanide.

The ERP details the specific roles and responsibilities of each person during anticipated emergency situations. It details the use of cyanide antidotes and first aid measures for cyanide exposure. It describes the response actions of the emergency response team. Containment, assessment, mitigation and future prevention of releases are also covered in the ERP.

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2.5.2 Production Practice 5.2

Involve site personnel and stakeholders in the planning process.

in full compliance with

Allship Logistics is

in substantial compliance with

Production Practice 5.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Production Practice 5.2 requiring the operation to involving site personnel and stakeholders in the planning process.

The facility has involved its workforce and stakeholders in the emergency response planning process. Direct engagement of communities by Allship did not occur as the Ghanaian EPA is tasked with the consultation of the community on the issue of cyanide transportation and warehousing. Also, the nature and scale of identified scenarios are unlikely to result in impacts beyond the facility boundary and the community are not designated a role as part of the planned response to an emergency involving cyanide.

Local response agencies such as outside responders and medical facilities have been involved in the emergency planning and response process. Allship has advised external responders and medical facilities of their roles during an emergency response. Letters were sent to a number of emergency services and medical providers prior to the audit advising them of Allship’s cyanide practices. The role of the medical and fire agencies are within the scope of their normal duties.

The operation engages in regular consultation and communication with stakeholders to assure that the ERP addresses current conditions and risks. The ERP requires Allship to use the lessons learnt from mock drills and other change management processes to update the Plans.

In case of any emergency or incident at the warehouse, an investigation report will be issued and the company will review and revise the ERP when necessary. The client (supplier) and Mine sites will be notified accordingly of any changes to the ERP.

2.5.3 Production Practice 5.3

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

in full compliance with

Allship Logistics is

in substantial compliance with

Production Practice 5.3


not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Production Practice 5.3 requiring designated appropriate personnel and committed equipment and resources for emergency response.

The ERP specifies that the Safety Officer assigned to the warehouse is responsible for initiation of alerts and for the call-out to the Safety Manager who then makes the call outs to the participating internal and external responders.

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The ERP identifies the emergency response teams.

Training in the ERP is undertaken. The training comprises annual cyanide emergency response scenario training (mock drill).

The ERP details cell phone contact information for company leaders and team members are called by radio.

The ERP details the duties and responsibilities of personnel in the event of a cyanide emergency, including the Safety Officer, Emergency Response Team and the Forklift Operator.

The ERP lists the emergency response equipment kept at the facility. The first-aid and emergency response equipment are stored within a plastic carry container in a box in the escort vehicle and in the office building. The equipment is inspected weekly. The site has a safety shower and eyewash station, which is inspected and tested weekly to ensure it is in good order and operating effectively. Two non-acidic fire extinguishers are located at the warehouse. Additional fire extinguishers are located at the office block, generator and gate house. The fire extinguishers are inspected annually by a third party.

The ERP details the duties and responsibilities of personnel in the event of a cyanide emergency, including ambulance, medical facility, and EPA.

2.5.4 Production Practice 5.4

Develop procedures for internal and external emergency notification and reporting.

in full compliance with

Allship Logistics is

in substantial compliance with

Production Practice 5.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Production Practice 5.4 requiring development of procedures for internal and external emergency notification and reporting.


The ERP includes procedures and contact information for notifying management, regulatory agencies, outside response providers and medical facilities of the emergency.

The ERP requires the Safety Manager to liaise with internal personnel (Safety Officer, Logistics Manager, and Departmental Heads) and communicate to external responders (e.g. fire service, police service, ambulance).

The ERP includes procedures and contact information for notifying potentially affected communities of the incident and/or response measures and for communication with the media.

The ERP does not specifically address contact with the media. However, the ERP states that the HSE Manager is responsible for communicating with all external parties.

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2.5.5 Production Practice 5.5

Incorporate into response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.

in full compliance with

Allship Logistics is

in substantial compliance with

Production Practice 5.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Production Practice 5.5 requiring the operation to incorporate monitoring elements that account for the additional hazards of using cyanide treatment chemicals into response plans and remediation measures.

The ERP describes specific, appropriate remediation measures, such as recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris, and provision of an alternate drinking water supply, as appropriate. It details that remedial measures will include *in situ* neutralisation or digging out contaminated soil, then decontaminating the soil using sodium or calcium hypochlorite solution, or hydrated ferrous sulfate crystals or solution.


Contaminated soil which is not remediated will be transferred to one of the mine sites tailings dams for disposal.

There is no surface water on the site or within proximity of the site. Nonetheless the ERP (Section 4.3.6) prohibits the use of sodium hypochlorite or ferrous sulfate or any cyanide neutralising chemical to be used in neutralising cyanide that has entered surface water.

The ERP address the potential need for environmental monitoring to identify the extent and effects of a release, include sampling methodologies and parameters.

The ERP provides for sampling and analysis of surface water through external laboratories in Tarkwa or the nearby mine site laboratories.

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2.5.6 Production Practice 5.6

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

in full compliance with

Allship Logistics is

in substantial compliance with

Production Practice 5.6

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Production Practice 5.6 requiring the operation to periodically evaluate response procedures and capabilities and revise them as needed.

The ERP includes provisions for annually reviewing and evaluating its adequacy. The ERP will also be reviewed in the event of an emergency, incident or mock drill.

The ERP had been updated during the audit period as verified through a review of previous versions and interviews.


Mock emergency drills are conducted annually to test response procedures for various exposure scenarios, and the lessons learned from the drills are incorporated into emergency response planning.

No changes were required to the procedures for emergency responses.

In the event of an emergency or incident at the warehouse, an investigation report will be prepared and Allship will review and revise the ERP as necessary. The facility has not had any emergencies involving cyanide to date.

The ERP had been updated during the audit period as verified through a review of previous versions and interviews.

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3.0 IMPORTANT INFORMATION

Your attention is drawn to the document titled – “Important Information Relating to this Report”, which is included in Appendix A of this report. The statements presented in that document are intended to inform a reader of the report about its proper use. There are important limitations as to who can use the report and how it can be used. It is important that a reader of the report understands and has realistic expectations about those matters. The Important Information document does not alter the obligations Golder Associates has under the contract between it and its client.

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Report Signature Page

GOLDER ASSOCIATES PTY LTD

A handwritten signature in black ink, appearing to read 'E. Clerk'.

Edward Clerk
ICMI Lead Auditor

JEJ/EWC/hsl

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APPENDIX A

Important Information



IMPORTANT INFORMATION RELATING TO THIS REPORT

The document (“Report”) to which this page is attached and which this page forms a part of, has been issued by Golder Associates Pty Ltd (“Golder”) subject to the important limitations and other qualifications set out below.

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The scope of Golder’s Services and the period of time they relate to are determined by the Contract and are subject to restrictions and limitations set out in the Contract. If a service or other work is not expressly referred to in this Report, do not assume that it has been provided or performed. If a matter is not addressed in this Report, do not assume that any determination has been made by Golder in regards to it.

At any location relevant to the Services conditions may exist which were not detected by Golder, in particular due to the specific scope of the investigation Golder has been engaged to undertake. Conditions can only be verified at the exact location of any tests undertaken. Variations in conditions may occur between tested locations and there may be conditions which have not been revealed by the investigation and which have not therefore been taken into account in this Report.

Golder accepts no responsibility for and makes no representation as to the accuracy or completeness of the information provided to it by or on behalf of the Client or sourced from any third party. Golder has assumed that such information is correct unless otherwise stated and no responsibility is accepted by Golder for incomplete or inaccurate data supplied by its Client or any other person for whom Golder is not responsible. Golder has not taken account of matters that may have existed when the Report was prepared but which were only later disclosed to Golder.

Having regard to the matters referred to in the previous paragraphs on this page in particular, carrying out the Services has allowed Golder to form no more than an opinion as to the actual conditions at any relevant location. That opinion is necessarily constrained by the extent of the information collected by Golder or otherwise made available to Golder. Further, the passage of time may affect the accuracy, applicability or usefulness of the opinions, assessments or other information in this Report. This Report is based upon the information and other circumstances that existed and were known to Golder when the Services were performed and this Report was prepared. Golder has not considered the effect of any possible future developments including physical changes to any relevant location or changes to any laws or regulations relevant to such location.

Where permitted by the Contract, Golder may have retained subconsultants affiliated with Golder to provide some or all of the Services. However, it is Golder which remains solely responsible for the Services and there is no legal recourse against any of Golder’s affiliated companies or the employees, officers or directors of any of them.

By date, or revision, the Report supersedes any prior report or other document issued by Golder dealing with any matter that is addressed in the Report.

Any uncertainty as to the extent to which this Report can be used or relied upon in any respect should be referred to Golder for clarification.

At Golder Associates we strive to be the most respected global company providing consulting, design, and construction services in earth, environment, and related areas of energy. Employee owned since our formation in 1960, our focus, unique culture and operating environment offer opportunities and the freedom to excel, which attracts the leading specialists in our fields. Golder professionals take the time to build an understanding of client needs and of the specific environments in which they operate. We continue to expand our technical capabilities and have experienced steady growth with employees who operate from offices located throughout Africa, Asia, Australasia, Europe, North America, and South America.

Africa	+ 27 11 254 4800
Asia	+ 86 21 6258 5522
Australasia	+ 61 3 8862 3500
Europe	+ 356 21 42 30 20
North America	+ 1 800 275 3281
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

