



**REPORT**

# International Cyanide Management Code Transport Recertification Summary Audit Report

*Movis Ghana Limited*

Submitted to:

**International Cyanide Management Institute (ICMI)**

1400 I Street, NW Suite 550  
Washington, DC 20005  
UNITED STATES OF AMERICA

**Movis Ghana Limited**

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Submitted by:

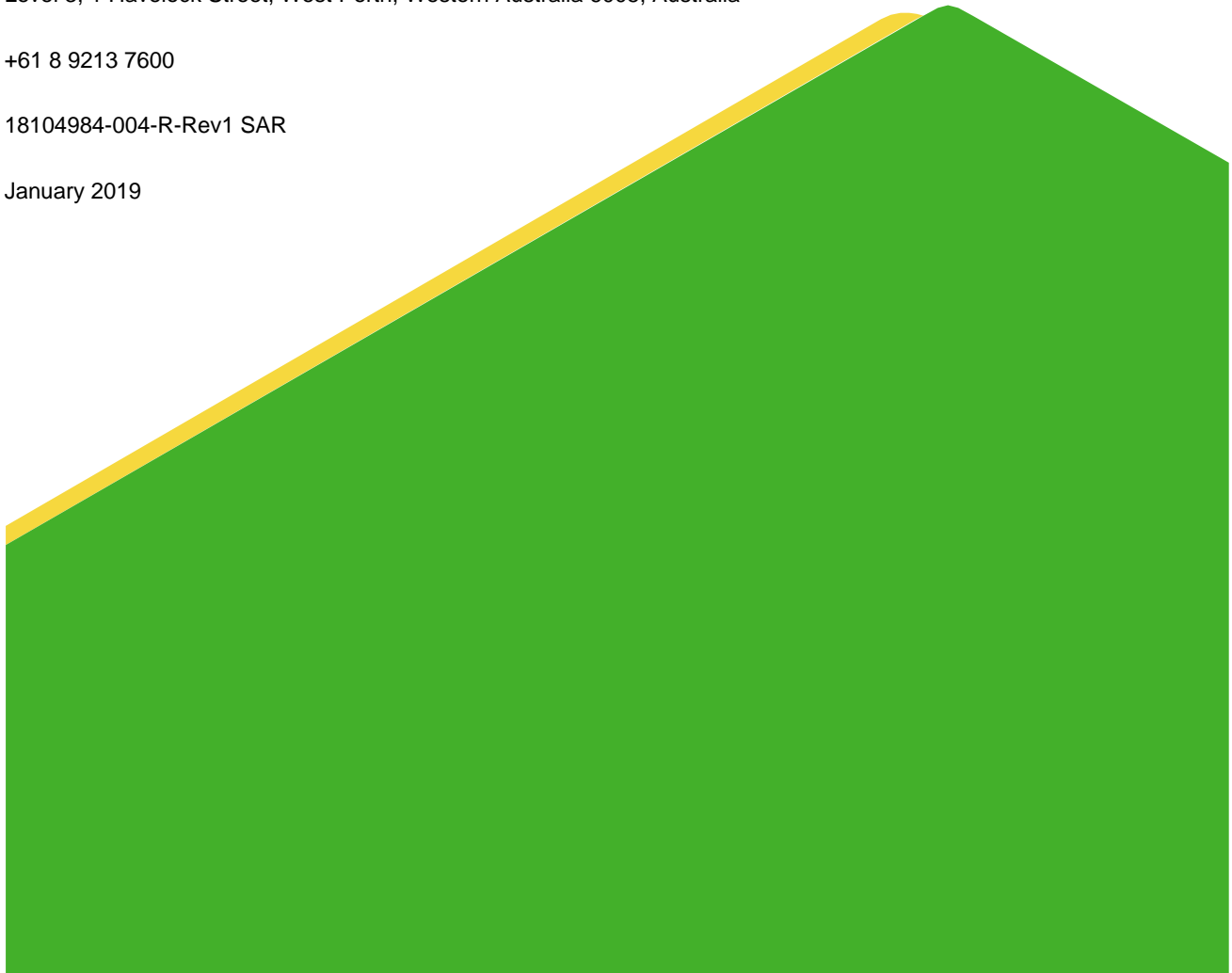
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## 1.0 INTRODUCTION

### 1.1 Operational Information

<b>Name of Transportation Facility:</b>	Movis Ghana Limited
<b>Name of Facility Owner:</b>	Not Applicable
<b>Name of Facility Operator:</b>	Movis Ghana Limited
<b>Name of Responsible Manager:</b>	Hubert Asamoah, HSEQ Manager
<b>Address:</b>	2 <sup>nd</sup> Floor Wing A, Nicholas Plaza, Off Meridian Road, Community 1
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<b>Country:</b>	Ghana
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### 1.2 Audit Scope

The scope of this Recertification audit covers the road transportation of cyanide by Movis Ghana Limited (Movis). At the time of the audit this involved cyanide transportation from the Ports of Takoradi and Tema in Ghana to its mine site customers in Ghana and Niger.

### 1.3 Movis and Road Transportation

Movis is a joint venture between Geodis Wilson (France) and Sivom (Ivory Coast) and it has offices in Tema, Accra and Takoradi. Movis provides freight forwarding, logistics and warehousing services. It has been transporting hazardous materials and general goods serving Ghana, Niger, Burkina Faso, Ivory Coast, Senegal, Cameroon, Chad and Mali.

Movis transports cyanide that is imported to Ghana through the Port of Tema and the Port of Takoradi. Movis transports cyanide within Ghana and also to Samira Mining in Niger. During 2016-2018 Movis transported cyanide to the following operations:

- Tema Port – Samira mine, Niger
- Takoradi Port – Samira mine, Niger
- Takoradi Port – Perseus Mine Ayanfuri, Ghana
- Takoradi Port – Goldfields Mine Tarkwa, Ghana.

Movis transports solid sodium cyanide as a >95% pure white briquette. The cyanide briquettes are packaged in Intermediate Bulk Containers (IBCs) with a capacity of 1000 kg or 1200 kg. The briquettes are stored within a woven polypropylene bag, sealed with a polyethylene plastic liner, within a wooden crate. Consignments of stock are transported in standard shipping containers (sea containers) of up to a maximum of 24.2 tons.

### 1.4 Trans-shipping Depots or Interim Storage Sites

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

Movis Ghana Limited

Name of Facility



Signature of Lead Auditor

31 January 2019

Date

## 2.0 AUDITORS FINDINGS AND ATTESTATION

in full compliance with

**Movis is:**  in substantial compliance with **The International Cyanide Management Code**

not in compliance with


No significant cyanide exposures or releases were noted to have occurred during the recertification audit.

**Audit Company:** Golder Associates Pty Ltd

**Audit Team Leader:** Ed Clerk, Exemplar Global (105595)

**Email:** [eclerk@golder.com.au](mailto:eclerk@golder.com.au)

### 2.1 Name and Signatures of Other Auditors

Name	Position	Signature	Date
Edward Clerk	Lead Auditor and Transport Technical Specialist		31 January 2019

### 2.2 Dates of Audit

The recertification transport audit of Movis was undertaken over two days on 10-12 September 2018.

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 *Cyanide Transportation Verification Protocol for the International Cyanide Management Code* and using standard and accepted practices for health, safety and environmental audits.

Movis Ghana Limited

Name of Facility



Signature of Lead Auditor

31 January 2019

Date

## 3.0 CONSIGNOR SUMMARY

### 3.1 Principle 1 – Transport

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

#### 3.1.1 Transport Practice 1.1

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

in full compliance with

Movis is  in substantial compliance with **Transport Practice 1.1**

not in compliance with

#### Summarise the basis for this Finding/Deficiencies Identified:

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

Movis has implemented a route assessment procedure to guide the selection and review of transport routes to minimise the potential for accidents and releases or the potential impacts of accidents and releases. The *Route Selection and Risk Assessment Procedure* prompts the persons undertaking the route assessment to identify hazards along the route which are then assessed in accordance with the procedure. Following a risk assessment, the procedure requires the *Sodium Cyanide Emergency Response Plan (CERP)* and *Transport Management Plan (TMP)* to be reviewed and updated to reflect any new risks identified or the implementation of risk controls or mitigation measures during the risk assessment process.

Movis has implemented processes and a procedure to periodically re-evaluate routes used for cyanide deliveries. The *Route Selection and Risk Assessment Procedure* and *TMP* note that route assessments will be reviewed and updated annually, or when there is a significant change to a transport route.

Movis has a process for providing feedback on route conditions during the journey and after each convoy. The *TMP* requires *Feedback Reports* to be completed by the Escort Leader after the return of each journey. These forms, along with continuous journey feedback verbally provided by drivers on the state of roads are also taken into consideration in route assessments.

Movis has documented measures taken to address risks identified with the selected routes within the *TMP* and *Route Risk Assessments*.

Movis seeks input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures. Movis has identified suppliers, government ministries and departments, mine site customers and medical providers as stakeholders. Licences issued by Ghanaian regulatory authorities are recognised by ECOWAS (Economic Community of West African States) countries. Ghana, Burkina Faso and Niger are member countries of ECOWAS.

Movis utilises road convoys to address safety concerns during transport and has developed a *Convoy Management Plan (CMP)* that details the requirements of transport in convoys.

The *CERP* identifies responsibilities for external responders and has advised them of their roles during an emergency response. Direct engagement of communities by Movis did not occur as the communities are not designated a role as part of the planned response to an emergency involving cyanide negating the need for community consultation on this issue.

Movis Ghana Limited

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Signature of Lead Auditor

31 January 2019

Date

Movis does not subcontract its cyanide transport operations.

### 3.1.2 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.**

**Movis 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:

Movis 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.

Movis only uses trained and competent operators to drive its trucks. All drivers are checked to ensure they have the correct and valid licence before being employed and prior to each trip departure. Licences issued by Ghanaian regulatory authorities are recognised by ECOWAS countries. When travelling in Burkina Faso and Niger, an International Driver's Licence is also accepted and used by drivers.

The CMP details training requirements for drivers and escort personnel including that all old and new employees must have the following mandatory training prior to transporting:

- Cyanide awareness
- Defensive driving
- Emergency response scenario (mock drill) training
- Fire fighting
- Convoy management.

Where drivers have not been trained in the required courses, they are not allocated to the convoy.

Movis does not subcontract its cyanide transport operations.

### 3.1.3 Transport Practice 1.3

**Ensure that transport equipment is suitable for the cyanide shipment.**

**Movis 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:

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

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Movis only uses equipment designed and maintained to operate within the loads it will be handling when transporting cyanide. The TMP states that Movis conforms with all regulations and codes as applicable to the transportation of dangerous goods and that prime movers and trailers shall be maintained to manufacturer's specifications and be subjected to government standards.

Movis has implemented a maintenance program. This program requires regular preventive maintenance services to be undertaken in accordance with the Original Equipment Manufacturer's (OEM) requirements. Pre-departure checks are also undertaken before each convoy.

Movis has procedures in place to prevent overloading of vehicles. The Escort Leader undertakes measures to ensure that the trucks transporting the consignment are roadworthy including ensuring all vehicles (prime movers and trailers) are inspected using the *Pre-Departure Checklist*. Specific truck/trailer combinations are also inspected (for transport of consignments) so that no combination is overloaded before leaving the port.

Movis does not subcontract its cyanide transport operations.

### 3.1.4 Transport Practice 1.4

#### Develop and implement a safety program for transport of cyanide.

in full compliance with

**Movis is**  in substantial compliance with **Transport Practice 1.4**

not in compliance with

#### Summarise the basis for this Finding/Deficiencies Identified:

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

Movis has a *Pre-Departure Checklist* to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging. This procedure requires Movis to check container seal integrity and the trailer twist locks for damage. The TMP requires information, including container and seal integrity to be supplied to the mine site before the convoy leaves port.

Placards are used to identify the shipment as cyanide, as required by international standards. The TMP requires that the containers used to transport solid sodium cyanide are marked with the required placards in accordance with International Maritime Dangerous Goods Code.

The *Route Selection and Risk Assessment Procedure* requires Movis to consider regulatory requirements that have the potential affect the transportation of dangerous goods in all countries through which it travels as part of the initial planning of the transport route. Specific requirements that are identified are incorporated within the TMP.

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

- Vehicle *inspections prior to each departure/shipment*.

Movis has a *Pre-Departure Checklist* that is completed on all vehicles prior to departure.

■ *A preventative maintenance program.*

Movis has implemented a maintenance program. This program requires regular preventive maintenance services to be undertaken in accordance with the OEM requirements.

■ *Limitations on operator or drivers' hours.*

The CMP includes a Fatigue Management procedure that provides measures to control fatigue. Some of these include:

- Specified maximum driving times and mandated breaks.
- Journey stopover points.

■ *Procedures to prevent loads from shifting.*

At the Tema and Takoradi Ports, containers are fastened after being loaded onto trailers using twist locks and container belts.

■ *Procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered.*

Movis has a procedure to suspend operations for inclement weather or problems on the route.

The TMP notes that the Convoy Leader will manage the convoy suitably in adverse conditions. This will include adjusting convoy speeds due to bad roads, weather or dust conditions.

■ *A drug abuse prevention program.*

Movis has a *Zero Tolerance Drugs and Alcohol Policy*. The Policy effectiveness is assessed through pre-employment and random alcohol testing in the work place.

■ *Retention of records documenting that the above activities have been conducted.*

Records are retained and were observed confirming the above activities have been conducted.

Movis does not subcontract its cyanide transport operations.

### 3.1.5 Transport Practice 1.5

#### Follow international standards for transportation of cyanide by sea and air.

in full compliance with

Movis is

in substantial compliance with

**Transport Practice 1.5**

not in compliance with

#### Summarise the basis for this Finding/Deficiencies Identified:

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

Movis does not transport consignments of cyanide by sea or air within the scope of this audit.

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Signature of Lead Auditor

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### 3.1.6 Transport Practice 1.6

**Track cyanide shipments to prevent losses during transport.**

in full compliance with

**Movis is**

in substantial compliance with

**Transport Practice 1.6**

not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

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

Movis' vehicles use cell phones to communicate with the transport depot, the mining operation, the cyanide producer and emergency responders. While in convoy, trucks must maintain cell phone communication. Escort personnel must call the Logistics Officer in Tema at designated Call Points along the route and all calls are logged in the communication log sheet.

Communication equipment is tested to ensure it functions properly either periodically or through continuous means. The *Pre-Departure Checklist* includes a check for phone function, as does the *Escort Vehicle Pre-Trip Checklist*.

Global Positioning System (GPS) tracking is checked prior to and throughout voyages through the review of reports generated by the tracking system. The GPS tracking system continuously transmits position and other data from the convoy throughout the trip. The combined use of cell phones with multiple service providers has eliminated blackout areas along the transport route. Blackout areas are also checked for during the route survey process.

Movis has implemented inventory controls and/or chain of custody documentation to prevent loss of cyanide during shipment. After the initial inspection, a way-bill is generated by Movis for each container. The way-bill accompanies the Driver during the delivery. The way-bill includes a description of the goods, including container and seal details. This system is used as proof of delivery to customer mines.

The TMP requires all trucks and escort vehicles to have laminated cards showing the Safety Data Sheets for sodium cyanide.

Movis does not subcontract its cyanide transport operations.

Movis Ghana Limited

Name of Facility



Signature of Lead Auditor

31 January 2019

Date

### 3.2 Principle 2 – Interim Storage

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

#### 3.2.1 Transport Practice 2.1

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

in full compliance with

Movis is

in substantial compliance with

Transport Practice 2.1

not in compliance with

#### Summarise the basis for this Finding/Deficiencies Identified:

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 Movis.

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

Movis Ghana Limited

Name of Facility



Signature of Lead Auditor

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Date

### 3.3 Principle 3 – Emergency Response

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

#### 3.3.1 Transport Practice 3.1

Prepare detailed Emergency Response Plans for potential cyanide releases.

in full compliance with

Movis is

in substantial compliance with

**Transport Practice 3.1**

not in compliance with

#### Summarise the basis for this Finding/Deficiencies Identified:

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

Movis has developed an CERP which is specific to the design of the vehicles and transportation routes used by Movis. The CERP contains a Specific Emergency Response Guide that details incident types and it includes scenarios for truck transportation. It considers both the physical and chemical form of cyanide along with the method of transport. The consideration of transport infrastructure has also been undertaken by Movis through Route Risk Assessments. Route Risk Assessments detail the condition of the road, traffic hazards, intersections and issues to be managed by the driver along the route. The *Route Selection and Risk Assessment Procedure* considers the design of the intended transport vehicles.

The Specific Emergency Response Guide section of the CERP details incident types including the scenarios:

- Handling Wet Sodium Cyanide
- Rollover of Cyanide Container with spill in or outside a community
- Rollover of Cyanide container without spill in or outside a community.

A decontamination of a persons and equipment procedure is also included in the CERP.

The CERP details internal and external responsibilities in the event of an emergency including responsibilities specific to the three emergency incident types. Responsibilities are provided for Escort Leader, Emergency Response Team (ERT), Vehicle Driver, Movis Ghana Ltd, the Mine Site and external emergency services.

Emergency contact numbers for internal and external entities are provided in the CERP.

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Signature of Lead Auditor

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### 3.3.2 Transport Practice 3.2

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

in full compliance with

**Movis is**

in substantial compliance with

**Transport Practice 3.2**

not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

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

Movis provides initial and periodic emergency response training of appropriate personnel, including implementation of the CERP. Movis has developed and implemented a training scheme for its drivers and escort personnel. The minimum training requirements are:

- Cyanide awareness
- Defensive driving
- Emergency response scenario (mock drill) training
- Fire fighting
- Convoy management.

The emergency response training is detailed in the TMP.

A review of the *Training Matrix* indicated that drivers had completed the mandatory training. The Escort Leader checks drivers have the required up to date training prior to departure. Refresher training is planned at a minimum on an annual basis.

Descriptions of the specific emergency response duties and responsibilities for internal personnel and external entities are included for:

- Escort Leader
- Vehicle driver
- Emergency Response Team
- Police services
- Ambulance services
- Fire services
- EPA
- Movis Ghana Ltd
- Mine Site.

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Movis maintains a list of all of 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 *Emergency Equipment Checklist*, *Pre-Departure Checklist* and *Escort Vehicle Pre-Trip Checklist*. It is the Escort Leader's responsibility to ensure that all emergency equipment is checked and are up to manufactures specification prior to convoy departure.

Movis has emergency response and health and safety equipment, including personal protective equipment during transport. Movis has procedures to inspect emergency response equipment and assure its availability when required. The quantity and condition of the equipment is checked as part of the *Emergency Equipment Checklist*, *Pre-Departure Checklist* and *Escort Vehicle Pre-Trip Checklist*.

Movis does not subcontract its cyanide transport operations.

### 3.3.3 Transport Practice 3.3

**Develop procedures for internal and external emergency notification and reporting.**

in full compliance with

**Movis is**

in substantial compliance with

**Transport Practice 3.3**

not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

Movis is in FULL COMPLIANCE with Transport Practice 3.3 requiring that they develop procedures for internal and external emergency notification and reporting. The CERP and TMP contain procedures and current contact information for notifying outside response providers, and medical facilities of an emergency. The CERP contains emergency communication procedures, an *Emergency Call List*, *Medical Support and Emergency Equipment Contacts*, and an *Emergency Contacts of other External Responders* list. Emergency contact details for authorities, emergency responders and medical facilities are included in these procedures.

Systems are in place to ensure that internal and external emergency notification and reporting procedures are kept current. The *Route Risk Assessment* is reviewed annually or when there is a significant change to a transport route. The CERP is then updated as required and re-issued to medical providers and emergency services along the route for comment on whether the facility has capacity and capability to respond to a potential cyanide incident. As part of this process, emergency responder contact information is checked and updated as required if comment is received from emergency responder.

### 3.3.4 Transport Practice 3.4

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

in full compliance with

**Movis is**

in substantial compliance with

**Transport Practice 3.4**

not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

Movis 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.

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Movis has a procedure for remediation, such as recovery or neutralisation of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris.

The CERP includes descriptions of the response actions for an anticipated emergency situation. The CERP includes descriptions covering clean up and decontamination of personnel and equipment, and response actions for three emergency scenarios; handling wet sodium cyanide; roll-over of shipping container with spill in or outside a community; and rollover of cyanide container without spill in or outside a community.

The procedure on decontamination describes the general response to a cyanide spill. In a solid spill event, an attempt is first made to safely recover as much product as is practicable in order to reduce the amount of cyanide requiring in-situ neutralisation. Recovered product and contaminated materials are placed into drums or lined cyanide recovery boxes and taken to the Mine Site for disposal and or use in operations where possible. For spills of liquid cyanide, recovery of product is generally not possible, therefore in-situ neutralisation of the impacted material is required.

Prior to neutralisation activities commencing, an effort is made to understand the soil structure, pH and permeability of the impacted area – this information assists in determining the amount of sodium hypochlorite (preferred neutralisation reagent) to be used; and maintaining a suitable pH during the neutralisation process. The sodium hypochlorite is available in a variety of strengths and a decision is made based on the nature of the spill event as to the correct reagent strength and the process to prepare the reagent used in decontamination.

Movis prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water.

The CERP states:

*Under no circumstances will sodium hypochlorite or Ferrous Sulphate or any cyanide neutralizing chemicals be used in neutralizing cyanide that has entered surface water as this is strictly prohibited.*

**3.3.5 Transport Practice 3.5**

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

in full compliance with

**Movis is**

in substantial compliance with

**Transport Practice 3.5**

not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

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

There are provisions for periodically reviewing and evaluating the adequacy of the CERP. The CERP states that:

*Emergency Response Procedures are audited annually. The function and structure of the Movis Ghana Ltd ERT is reviewed annually to ensure its effectiveness.*

Movis Ghana Limited

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Movis has provisions for periodically conducting mock emergency drills. The CMP details mandatory training requirements for drivers and escort personnel which includes Cyanide Awareness and Mock Drill training.

Mock drills are conducted as part of the mandatory emergency response training (Emergency response scenario (mock drill) training) conducted annually. A larger mock drill (exposure and spill clean-up) was conducted in June 2018. The drill was reported, improvements identified and duly implemented.

The CERP states that:

*...the CERP will be reviewed when necessary based on findings from yearly mock drills conducted by Movis Ghana Ltd.*

Movis has a procedure to evaluate the Plan's performance after its implementation and revise it as needed.

The CERP states that:

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

## 4.0 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.

Movis Ghana Limited

Name of Facility



Signature of Lead Auditor

31 January 2019

Date

## Signature Page

**GOLDER ASSOCIATES PTY LTD**



Ed Clerk

*ICMC Lead Auditor and ICMC Transportation Expert*

EWC/JEJ/hn

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**APPENDIX A**

**Important Information**

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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