



January 2014

ICMI RE-CERTIFICATION SUMMARY AUDIT REPORT

Vehrad Transport and Haulage Ltd, Ghana

Submitted to:

International Cyanide Management Institute,
888 16th Street, NW-Suite 303,
Washington, DC 20006,
USA

Vehrad Transport and Haulage
Plot 16/17,
Heavy Industrial Area,
Tema,
Ghana

REPORT

Report Number. 1400686-13202-2

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1.0 SUMMARY AUDIT REPORT FOR GOLD MINING OPERATIONS

Name of Cyanide Transportation Facility: Vehrad Transport and Haulage, Tema Yard.

Name of Cyanide User Facility Owner: Vehrad Transport and Haulage Ltd.

Name of Cyanide User Facility Operator: Vehrad Transport and Haulage Ltd.

Name of Responsible Manager: Mr. Ghassan Hussein,
Deputy Managing Director

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Plot 16/17,
Heavy Industrial Area,
Tema,

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2.0 LOCATION DETAIL AND DESCRIPTION OF OPERATION

Vehrad Transport and Haulage Ltd are contracted as a cyanide transporter for Samsung to transport solid cyanide (briquettes) by road from Tema and Takoradi harbours to client mines in Ghana, Burkina Faso, Niger and Mali. Vehrad's main operations base is located at Plot 16/17, Heavy Industrial Area, Tema, Ghana, (their Tema yard), located approximately 2 km from the Tema harbour, within the greater Accra region.

Cyanide is received at the ports of Tema and Takoradi by sea in containers, which each hold 20 one-ton boxes of solid briquette cyanide. The containers are offloaded at the ports by Meridian Port Services (MPS) and stored at their facility. MPS is part of the ICMI audited supply chain of the cyanide producers and consignors bringing the cyanide into Ghana.

Containers are delivered from the Quays to the MPS Container Depot where they are stacked and stored separately. Control and monitoring of the containers is undertaken by MPS who subscribe to the IMDG Code. Vehrad's Cyanide Code responsibilities commence once they take the containers from the MPS storage area. Vehrad clears the consignment and Vehrad's vehicles collect the containers with the documentation and manage them under a Transport Management Plan (jointly agreed between Samsung the mine, and Vehrad).

The containers of cyanide, are then transported either in escorted convoy to the mine sites or to the bonded warehouse at the Tema yard, where they are loaded into sparging tankers for transportation to the mine. This facility is subject to a separate ICMI Cyanide Production Audit and is not included within the scope of this audit.

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Each truck has a driver, who is accompanied by a safety officer. The safety officer manages communications between the trucks, the escort vehicles and the convoy manager, and monitors the driver. The convoy includes a convoy manager, assistant convoy manager, a cyanide first aid-competent nurse, a mechanic, cyanide emergency response equipment for spills and releases and medical equipment to treat cyanide exposures (splashes, skin exposures, inhalations and ingestions). The convoys include an armed police escort whilst travelling through Ghana.

A handwritten signature in black ink, appearing to be 'R. L.', positioned above a horizontal line.

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Signature of Lead Auditor

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Date



3.0 SUMMARY AUDIT REPORT

3.1 Auditors Findings

in full compliance with

**The International
Cyanide Management
Code**

Vehrad Transport and Haulage Ltd. is: in substantial compliance with

not in compliance with

Audit Company: Golder Associates Africa (Pty) Ltd
Audit Team Leader: Ed Perry, Lead Auditor
Email: eperry@golder.com

Vehrad Transport and Haulage Ltd. has experienced one significant cyanide incidents during the previous three year audit cycle.

The incident occurred on 29 July 2011, which was subsequently reported to ICMI by Vehrad Transport and Haulage Ltd. The incident occurred near the town of Djibo, Burkina Faso. A convoy of 6 trucks each carrying two 20 tonne shipping containers of solid sodium cyanide were travelling along the main road which crossed a low earthen dam, when one of the trucks slipped off the dam in order to avoid a large pothole. The truck and containers fell on to their side in shallow water at the downstream side of the dam. Cyanide was released into solution as the water came into contact with the solid cyanide resulting in a localised fish kill.

The incident investigation shows though mine personnel were on site at 15.00 shortly after the incident happened at 12.30 on Friday 29 July 2011. The mine personnel supplied two cranes however, due to the lack of space the larger crane, which was required to lift the container could not be deployed. A side lifter was subsequently sourced and deployed to site. The recovery was completed by 14.10 on Sunday 31 July 2011.

A delegation from the Ministry of Mines and the Ministry of the Environment had arrived on site by this time with whom the remedial action was agreed. It was agreed to keep the area barricaded for 10 days allowing a storm that was imminent to dilute any cyanide within the water to a non-toxic level.

Vehrad undertook an incident investigation. In addition Professor Mervat El-Hoz of Environmental Engineering Consulting was commissioned to undertake an environmental assessment of the accident. The conclusion of the report was that the direct impact of cyanide on the ecosystem was low. No dead fish were observed after 5 days from the date of the accident and no birds or livestock were found dead near the accident location. The report also concluded that "the sodium cyanide was washed away and dispersed bringing its levels to be below its standard and within the downstream system and on the accident location, which do not pose any threat to environment and health".

The investigation into the incident identified driver error as the route cause. This led to the route risk assessment being reviewed and a training session being given to the drivers on; the incident, the causes, and the updated risk assessment in order to prevent this incident from reoccurring. Vehrad has since ceased

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to deliver cyanide to this mine due to the transportation difficulties and therefore has not under taken any follow up evaluations to ensure that the remedy remains effective.

3.2 Name of Other Auditors

Lynton Brown, ICMI pre-certified Transportation Technical Specialist

3.3 Dates of Audit

The Re-certification Audit was undertaken between 19 and 21 May 2014.

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

Vehrad Transport and Haulage, Tema Yard

12 November 2014

Name of Facility

Signature of Lead Auditor

Date

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PRINCIPLE 1 – TRANSPORT

Transport Cyanide in a Manner that Minimizes the Potential for Accidents and Releases

Transport Practice 1.1: Select cyanide transport routes to minimize 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:

Procedures; JM13 Road Hazard Mapping Routes Selection and JM4 Procedure for Road Hazard Mapping state that a road hazard assessment needs to be undertaken for all routes. The routes within Ghana are dictated by the Ghanaian Environmental Protection Agency. The routes external to Ghana are suggested by the relevant mine as they have more experience of the road conditions in their relevant country and would be assisting in any recovery of a vehicle.

The availability of alternatives is extremely limited due to the rural nature of the road network to the mines. Feedback on the condition of the routes is provided by the Safety Manager of the Convoy and included in the Journey Plan for the next convoy. The Journey Plan is printed for the trip detailing the transient issues. On return of the Convoy the Safety Officer provides feedback on the route and then signs off the Journey Plan. The route risk assessments are updated every 5 years. This review includes representatives from the company, and an external structural engineer specialising in bridges, travelling the entire route. The Route Risk Assessment to Inata Mine (not an ICMI signatory) was updated following the accident on 29 July 2011.

The Route Risk Assessments included the following: identification of areas of population; the roads and road conditions, roundabouts, ramps, bridges, the pitch and grade of the road are considered where these may increase the risks associated with the transportation, and the proximity of water bodies and fog where appropriate.

The measure taken to address the risks identified with selected routes are documented within the Route Risk Assessments. In addition Summary Reports are contained within the Drivers Handbook. Convoy Managers have copies of the full route risk assessments and summary route risk assessments with them on the convoy. In addition in the Drivers Handbook there is a map of the route with pictograms showing the location of issues along the route.

Ghana EPA specifies the routes to be undertaken within Ghana (pers. comm.). The EPA liaises with District Assemblies who are part of the emergency response teams. The communities and regulators outside Ghana are communicated with by the mine. A seminar is undertaken on a regular basis to undertake Cyanide Awareness and Community Involvement, with the latest one being on 30 January 2014. Invitations were sent to all of the municipalities involved and those who attended were flown in at the company's expense.

All cyanide deliveries are conducted using a convoy system. This includes the truck(s) carrying the ISO Tanker or ISO Container, a police escort is at the front of the convoy while in Ghana, and the Safety Officer traveling in a 4x4 vehicle at the back of the convoy.

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Within Ghana the EPA acts as the co-ordinator of the external responders informing the medical facilities and District Authorities. A seminar is undertaken every 3 years to brief stakeholders, police, customs, NGOs, Fire Service, Chamber of Mines, mines representatives, National Disaster Management, hospitals and port authorities on cyanide awareness and emergency planning. The last seminar was undertaken on 30th January 2014.

No sub-contracting is undertaken.

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.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Procedure OR16 - Recruitment Policy requires that drivers have at least three years driving experience in straight chassis vehicles and three years experience with trailer trucks. Drivers are required to possess a legitimate professional driving licence, code "F", and hold at least a Middle School Leaving Certificate or Junior Secondary School Certificate and they should be able to read and write. Furthermore, a basic requirement in road sign comprehension is required. Procedure OR 39 - Driver Induction List shows all requirements, including training. Procedures OR43 - Training Matrix, OR18 - Competency Framework (Critical Tasks), and OR44 Training Plan 2014 detail the training that needs to be undertaken and what has been undertaken.

Drivers are all required to undergo a Defensive Driver training program provided by Road Safety Limited (RSL), a registered training body using Shell 16 Module Training program. Drivers also have a Training Passport showing the training that has been undertaken and if their training is not up to date they are not allowed to drive a convoy.

No subcontracting is undertaken.

Transport Practice 1.3: Ensure that transport equipment is suitable for the cyanide shipment.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Briquettes being delivered to the mine in boxes are transported in metal shipping containers on flat bed lorries. All lorries have a daily inspection by the driver, a quarterly inspection by the in-house mechanics and an annual inspection by a third party (Road Safety Ltd). There is an annual check by the Driver and Vehicle Licensing Authority (DVLA) for road worthiness. All of the vehicles are designed to comply with the Ghanaian legal maximum axle weight of 11.5 tons.

The cyanide is delivered in standard containers which are fitted on custom trailer designs. It is not possible to overload the trailers because the containers are loaded by the producer with 20 boxes each 1 tonne in

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weight, therefore a trailer only carries 20 tonnes. In the case of a sparging tank the maximum load is 17 tonnes.

The third party inspections by Road Safety Ltd and annual check by the Ghanaian DVLA check the adequacy of the equipment for the load it must bear.

Conformity Statements from Global Energy Ventures regarding the refurbishment of ISO tankers for the carriage of solid cyanide briquettes that will be used for sparging is in accordance with ASME-B31.3 Guidelines and Standards.

No subcontracting is undertaken.

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:

The producer's packaging consists of plastic lined wooden boxes packed into 20 foot containers and sealed. They are not un-sealed until they reach the mine or if they are to be repackaged into a sparging tank (repackaging is a production operation under ICMI and therefore not part of the scope of this audit). The integrity of the boxes and containers can only be compromised if they are damaged during handling or moisture/water/liquids enter the containers or the boxes. The container is sealed by the producer and only opened at the mine, thus internal damage cannot be identified en route. Cyanide box sizes are such that the boxes fit snugly in the container and do not move. The containers match the trailer sizes and additional lugs have been welded onto the trailers to provide additional support to prevent movement in transit.

A Container Interchange Report is completed and jointly signed by the shippers representatives and the cyanide transporter's representatives to agree on any damage that may be sighted on the container at the port.

The Vehicle Trip Checklist is completed at the mine, on delivery of the container and a section reports on container seals, labelling and general container condition. This checklist is stamped by the mine representative.

Ghana transport regulations require marking and placarding according to the Hazardous Materials Transportation Manual. The Transport Management Plan also contains placarding requirements. The Plan refers specifically to placarding as per the IMDG Code requirements. In addition the last truck in the convoy at the back also has a large sign which states "Dangerous Convoy, Sodium Cyanide" in English and French.

Vehrad undertake a preventative maintenance program through the following inspections: daily inspection by the driver, a quarterly inspection by the in-house mechanics and an annual inspection by a third party (Road Safety Ltd). There is an annual check by the Driver and Vehicle Licensing Authority (DVLA) for road worthiness. There is also an third party inspection by Road Safety Limited prior to the convoy leaving for the mine. The Vehicle Trip Checklist is stamped by Road Safety Limited to confirm the check has been undertaken.

Procedure DM3 - The Rules for the Driver states that the driver must have a minimum of 15 minutes rest for every 4 hours of driving. The maximum shift is 12 hours with only 9 hours of this being driving, and that the

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driver must have an uninterrupted 36 hours rest after 6 days on duty. Drivers hours are included in the journey plan documentation.

Procedure H56 - Cyanide Handling and Convoy Movement covers the actions to be taken in the event of bad weather and coups.

Procedure DM13 – Road Transport policy states the following: “Drivers must compulsorily undergo random alcohol test & annual medical check up”; “No drunk driving, culprits will have their appointments terminated without warning of any kind”; and “The possession, use, distribution and/or sale of alcohol or illegal drugs on the convoy or workplace or while on company business is strictly prohibited.”

No subcontracting is undertaken.

Transport Practice 1.5: Follow international standards for transportation of cyanide by sea and air.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Vehrad is not involved in the management of shipments of cyanide by air or sea.

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:

Communication with vehicles in the cyanide convoy is undertaken using mobile phones, short-wave radio, and satellite phones. The drivers do not use the communications equipment. The accompanying safety officer in each truck communicates with the convoy leader and support vehicles. Convoy managers have all the appropriate telephone numbers to communicate with Vehrad head office and appropriate emergency responders and emergency services on the convoy route. The Vehrad head office manages all associated communications with the mine and the cyanide producer. All convoys have satellite phones in case of black out areas. GPS monitors all convoys. Convoys are phoned periodically from Vehrad head office. Convoys report in from various rest stops. This high level of communication was demonstrated during the incident of the 29 July 2011 when personnel from the nearby mine were informed and were able to attend the accident quickly.

Procedure H56 – Procedure for Cyanide Handling and Convoy Movement states that all communication equipment “should be well charged and in a good working condition and tested before departure”. This is also included as part of the Vehicle Trip Checklist.

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Vehrad transports and delivers sealed containers either in the form of an ISO container or ISO tanker. A waybill accompanies the convoy which includes chain of custody data such as container numbers, waybill numbers, shipping documentation, packing list, bill of lading, customs declarations, and producer invoice. The shipping records and Material Safety Data Sheets form part of the documentation that accompanies the convoys.

Checks are carried out at customs posts and borders and at the mine site. Convoy stops have checklists which include the inspection of container seals.

No subcontracting is undertaken.

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PRINCIPLE 2 – INTERIM STORAGE

Design, Construct and Operate Cyanide Trans-shipping Depots and Interim Storage Sites to Prevent Releases and Exposures.

Interim Storage

Practice 2.1:

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

in full compliance with

The operation is

in substantial compliance with

Interim Storage Practice 2.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

There are no situations where interim storage occurs.

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PRINCIPLE 3 – EMERGENCY RESPONSE

Protect Communities and the Environment through the Development of Emergency Response Strategies and Capabilities.

Emergency Response

Practice 3.1: Prepare detailed emergency response plans for potential cyanide releases.

in full compliance with

The operation is in substantial compliance with **Emergency Response Practice 3.1**

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Procedure H34 - Emergency Response Plan (ERP) is reviewed annually, compiled by Company Safety Officer reviewed by Deputy Managing Director. The electronic version will go with the convoy safety officer as part of the convoy to ensure that they have the latest version.

The ERP is only applicable for solid cyanide, which is the only form of cyanide transported by Vehrad. All activities and documentation are only applicable to road transport as no other method of transport is undertaken by Vehrad

The ERP includes: contact details, objective, harbour operation, preparation procedures, communication procedure, parking procedure, driving policy, unsafe conditions, unsafe acts, driving conditions, rules for convoy movement applicable for individual trucks, convoy manager, convoy medic, lead safety officer, convoy mechanic, senior safety officers, junior safety officers, convoy mate, escort cars, characteristics of convoy personnel, convoy positioning, drivers responsibilities' in cyanide transport. The ERP is appropriate for the selected transportation routes. No interim storage is undertaken.

The Route Risk Assessments undertake an assessment of the conditions of the road and stipulates whether the mitigation measures detailed in the ERP are applicable

Vehrad deliver boxes of cyanide briquettes within metal shipping ISO containers that remain un-opened and sealed until it gets to the mine. In addition Vehrad undertakes repackaging of briquettes into ISO tankers for sparging . The ERP is relevant to both types of transport vehicle.

The likely scenarios included within the ERP include the following: truck breakdown, truck accident no spill, truck accident spill, truck accident with fire, truck driver injury, and security risk armed robbery. The response actions for these scenarios are detailed within the ERP. The scenarios will be responded to by Vehrad's dedicated emergency response team that travel's with the convoy of cyanide transporters. The ERP states where liaison with outside responders e.g. police, fire brigade, is required.

On the 29 July 2011 an accident occurred during the transportation of cyanide to Inata mine (not a signatory to the ICMI) in the north of Burkina Faso. The convoy was travelling along the main road that goes across the top of a small earthen dam, when one of the trucks carrying two shipping containers slipped off the road onto its side into water adjacent to the dam. The Emergency Response Plan was implemented with immediate effect. The area was barricaded and all of the appropriate parties contacted. Although water did come in to contact with the cyanide resulting in a localised fish kill no further ecological damage was

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observed to have occurred. The lorry and the shipping containers were recovered approximately 48 hours after the incident occurred.

The investigation into the incident identified driver error as the route cause. This led to the route risk assessment being reviewed and a training session being given to the drivers on; the incident, the causes, and the updated risk assessment in order to prevent this incident from reoccurring. Vehrad has since ceased to deliver cyanide to this mine due to the transportation difficulties and therefore has not undertaken any follow up evaluations to ensure that the remedy remains effective.

Emergency Response

Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response.

in full compliance with

The operation is in substantial compliance with **Emergency Response Practice 3.2**

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Procedure OR18 - Competency Framework shows the training and competency needs, including emergency response for all positions. Emergency response training is undertaken on at least an annual basis. Transport vehicle operators receive initial and periodic refresher training in emergency response procedures.

Procedure H48 - Manual of Authority for Emergency Response includes a matrix of positions against duties in the event of an emergency.

The emergency response equipment that accompanies the cyanide convoy is checked before the convoy leaves the depot.

The convoy escort vehicles carry all the necessary emergency response equipment that may be needed including oxygen, antidote kit, first aid kit, and PPE

Procedure H51 - Safety Equipment Inventory and Status Control details the safety equipment available. Convoy safety equipment is checked and tested before the convoy moves as detailed on the Vehicle Trip Checklist

No sub-contracting is undertaken.

Emergency Response

Practice 3.3: Develop procedures for internal and external emergency notification and reporting.

in full compliance with

The operation is in substantial compliance with **Emergency Response Practice 3.3**

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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Procedure H81 - ER Contact List and Organogram details the contact information for medical support and emergency organisations, police and fire services in Ghana, Burkina Faso, Niger and Mali. This also contains an organogram showing the relevant structure for undertaking communications.

Procedure H48 - Manual Authority for Emergency Response Action details the responsibilities in the event of an emergency including the level of responsibility.

Procedure OR15 - System for Maintaining Records states that procedures are not be kept for more than 12 months unless there is a significant change, which will cause the relevant procedure to be reviewed earlier.

Emergency Response

Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

in full compliance with

The operation is in substantial compliance with **Emergency Response Practice 3.4**

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Procedure H56 - Procedure for Cyanide Handling and Convoy Movement includes the actions to be undertaken in the event of a spill such as the neutralisation of solids (no cyanide solutions are transported). This includes instruction for any waste material to be sent to the mine for disposal.

Procedure H56 - Procedure for Cyanide Handling and Convoy Management states "if the spill went into water body you must not by any means ADD ANY CHEMICAL"

Emergency Response

Practice 3.5: Periodically evaluate response procedures and capabilities and revise them as needed.

in full compliance with

The operation is in substantial compliance with **Emergency Response Practice 3.5**

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Procedure H34 - Emergency Response Plan (ERP) viewed in electronic form. Reviewed annually compiled by the Company Safety Officer reviewed by Deputy Managing Director. Most up to date version is electronic. The electronic version will go with the safety officer as part of the convoy to ensure that they have the latest version.

Drills are held annually including desk top drills. Physical drills are only held once every three years the last drill being on 7 May 2014.

The ERP is evaluated through undertaking emergency drills. Comments are provided on the drill evaluation form with the last drill being on 7 May 2014. A drill was undertaken in 2012 simulating a vehicle accident with a container carrying cyanide briquettes turning over. Attendance register was observed. Drill evaluation forms were completed. No revisions of the ERP were found to be necessary.

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The ERP was reviewed following the significant incident on 29 July 2011, no changes were required as the ERP was successfully implemented. The Route Risk Assessment was updated and the Communications Procedure OR2 rev. 05 was updated to include one point of contact for the press in the event of an incident.

A handwritten signature in black ink, appearing to be 'R. Golder', written over a horizontal line.

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Report Signature Page

GOLDER ASSOCIATES AFRICA (PTY) LTD.

Handwritten signature of Ed Perry in black ink.

Ed Perry
Lead Auditor

Handwritten signature of Marie Schlechter in black ink.

Marie Schlechter
Reviewer

MS/EP/ms

Reg. No. 2002/007104/07

Directors: SAP Brown, L Greyling, RGM Heath

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