



# BAM CONSULTANCY SERVICES LIMITED

P.O. Box: CS 8154 TEMA, GHANA

TEL: 030 331 9983 / 024 433 0392

GPS: GT-115-5410

Website: [www.bamconsultgh.com](http://www.bamconsultgh.com)

## ICMC RECERTIFICATION – SUMMARY REPORT

### INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

#### Transportation Summary Recertification Audit Report

## AFRICA TRANSPORT, CONAKRY, GUINEA

Date of Audit: 24<sup>th</sup> to 25<sup>th</sup> July 2025

For the

International Cyanide Management Institute

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## Table of Contents

Introduction.....	3
Acronyms and Abbreviations.....	4
Background of operation: .....	4
Auditor's Finding .....	6
Attestation .....	7
Principle 1, Transport: .....	8
Transport Practice 1.1: .....	8
Transport Practice 1.2: .....	13
Transport Practice 1.3: .....	15
Transport Practice 1.4: .....	17
Transport Practice 1.5: .....	21
Transport Practice 1.6: .....	21
Principle 2, Interim Storage: .....	23
Transport Practice 2.1: .....	23
Transport Principle 3- Emergency Response.....	23
Transport Practice 3.1: .....	23
Transport Practice 3.2: .....	26
Transport Practice 3.3: .....	28
Transport Practice 3.4: .....	30
Transport Practice 3.5: .....	31



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## INTRODUCTION

### 1.1 Operational information.

Name of Transport Company	:	Africa Transport, Conakry, Guinea
Name of Transport owner	:	Africa Transport, Conakry, Guinea
Name of facility operator.	:	Africa Transport, Conakry, Guinea
Name of responsible manager	:	Mohamed Sylla Alkabir
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## Acronyms and Abbreviations

ERP..... Emergency Response Plan

ICMC.....International Cyanide Management Code

ICMI.....International Cyanide Management Institute

QHSE.....Quality, Health, Safety & Environment

HSE .....Health, Safety & Environment

ONFPP..... Office National de Formation et de Perfectionnement Professionnels

IMDG .....International Maritime Dangerous Goods

RRA.....Route Risk Assessment

IBC.....Intermediate Bulk Container

ECOWAS....Economic Community of West African States

IVMS..... In-Vehicle Monitoring System

SMD.....Société Minier De Dinguiraye

SMM..... Société Minier de Mandiana

TMP..... Transport Management Plan

## 1.1 BACKGROUND OF THE OPERATION

Africa Transport, Republic of Guinea was established in 2012. It is a leading transport company based in Conakry, Guinea in West Africa. It transports all types of goods such as Sodium cyanide, general cargo as well as machinery and offers a cutting-edge logistics solution. It offers transportation services both in Guinea and neighbouring countries which borders Guinea. It also provides storage and warehousing services for general goods and mining items. The company is ISO14001:2018 certified.

Africa Transport, Guinea became a Signatory to the International Cyanide Management Code on 15<sup>th</sup> April 2019. The company was certified by ICMI on 22<sup>nd</sup> July 2022.

In the past 3 years there has not been any changes to the consigner, or individual components of the supply chain, such as the shipping line and ports since the previous audit.



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## Transportation of cyanide

Africa Transport was contracted by Africa Global Logistics (AGL Guinea) in 2022 to do the transportation of sodium cyanide on their behalf to Société Minier de Mandiana (SMM) a distance of 775km from the port of Conakry, Guinea to the mine site. The transporter also occasionally transports sodium cyanide manufactured by Hebei Chengxin to Société Minier De Dinguiraye (SMD) a distance of 670Km from the port of Conakry, Guinea to the mine site on behalf of Transco SA a logistics company in Guinea.

The transporter has a permit issued by the Guinea Ministry of Transport (Ministère Des Transports) permit # A/2022/879/MT/CAB/SGG dated 14/03/23 valid for 3 years. It also has a permit for the transportation of exceptional goods(oversize) permit# A/2022/829/MT/CAB/SGG and permit from the Ministry of Finance (Ministère Du Budget) permit # A/2022/8154/MB/SGG permitting the company to do customs clearance activities. Every 3 years the permits are subject to renewal.

All shipping documentation covering every shipment are processed through Guinea Customs prior to the arrival of a vessel to allow prompt clearing of the product from the port of Conakry. Upon arrival of a vessel at the port, Africa Transport will make trucks available at the port and are loaded directly from vessels onto the trucks after which they exit the port. The Guinea Port Authority is responsible for the off-loading of all the containers from the shipping vessels and loading them onto the trucks.

The containers of cyanide are collected from the port within 24 hours of arrival of a vessel. From the port the loaded trucks are escorted by the company's escort team and two Guinea police personnel to Africa Transport yard for a few hours where preparation for the journey is done and then they depart to the mine.

The overall control of the movement of a cyanide convoy is the sole responsibility of Africa Transport. The company has its own trained escort team who provide escorts right from the port through to the mine.

## Audit Scope

The audit covers the transportation of cyanide in 20ft shipping containers from the Port of Conakry, Guinea to mining companies within the country. The ICMI verification protocols were used as guidelines in conducting this audit.

## Audit Schedule

The recertification Audit was conducted from 24<sup>th</sup> to 25<sup>th</sup> July 2025.



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## Auditor's Finding.

This operation is

**X in full compliance**

in substantial compliance

not in compliance

with the International Cyanide Management Code.

## Compliance Statement

This operation has been found to be in full compliance with the requirements of the ICMI Cyanide transportation re-certification audit requirements. This operation has not experienced any compliance issues or significant cyanide incidents during the previous three-year audit cycle.

## Auditor Information.

Audit Company: **BAM Consultancy Services Limited**

Lead Auditor & Technical Expert Auditor: **Benjamin Amoo-Mensah**

Lead Auditor E-mail: **csbpghana@ghana.com**

Names and signatures of other Auditors: **None.**

Auditor 1: \_\_\_\_\_

Name (Print / Type Signature

Auditor 2: \_\_\_\_\_

Name (Print / Type Signature

Auditor 3: \_\_\_\_\_

Name (Print / Type Signature

Dates of Audit: This audit was conducted in the period of 24<sup>th</sup> to 25<sup>th</sup> July 2025.



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## Auditor Attestation.

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, 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 Cyanide Code Auditors.

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

Date: 31-10- 2025



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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.**

**The operation is:**

✓ in full compliance with Transport Practice 1.1

o in substantial compliance

o not in compliance

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

The company has developed a Transport Management Plan (Plan de Gestion du Transport de Cyanure) to manage its transportation operation. The company has a Route Transport Selection Procedure number PRO/CNC/02version 2 dated 01/07/2025 and Route Survey Procedure. The operation has selected the appropriate route from Conakry port terminal to Société Minier de Mandiana (SMM) mine and Société De Minier Dinguiraye (SMD). The route to the mines is the only government approved route to the two mines.

The QHSE Manager is responsible person to conduct the route selection and route review in consultation with the operations manager. The QHSE Manager organizes all the resources such as 4x4 vehicle and conduct the route survey with the Operations Manager and the convoy escort team leader. The road surveys are reviewed in the company's Transport Management Plan based on the following reasons;

- Following a significant change which has occurred on the road. This include road construction or severe accident.
- Following a significant change of operations performed on the route
- During dry season and another during the rainy season.
- Before commencement of operations after its suspension for more than 6 months or subsequent to an unusual event (climate, political or social event)

The transporter's TMP is reviewed every 2 years.

Africa Transport considered the following when conducting the route survey: -





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- Population density
- Waterways located along the route
- Road Infrastructure
- Weather condition and Fog
- Size of the road
- Slopes, bridges, distance
- Number of towns and villages
- Railway Crossings
- T-intersections
- Helipad
- Construction and general condition,
- Gradients and Steep turns
- Speed bumps
- Parking areas
- Schools
- Proximity to rivers and water,
- Road sealed or unsealed.
- Pitch and grade of road
- sandstorms and other environmental conditions

When selecting a particular route, the following process is followed;

- Recording of distance covered and taking of photos of all hazards on the route
- Checking of condition of bridges (level of deterioration)
- Checking details of road restrictions
- Exploiting of alternative bypassed routes (if available) when a particular road is undergoing repairs
- Transportation risk, environmental and road use safety factors.
- Identification of the hazards on the route
- Evaluation of the risks and implementation of control measures

Africa Transport has implemented a procedure to evaluate the risks of selected cyanide transport routes and has taken measures to manage these risks.

The operation has conducted Cyanide Transportation Risk Assessment as per RRA procedure document # PRO/CNC/06 version 02 dated 03/06/2025. Risk Assessment has been conducted on the route from Conakry port to Mandiani mine which is located close to the town of Loila a distance of 775Km and from Conakry port to Société Minier De Dinguiraye (SMD) a distance of 670Km from the port of Conakry. The QHSE Manager and his assistant conducts the risk assessment on selected route.

Population density in towns and villages along the route has been taken into account during the Route Selection Procedure. The risks identified on the route have been evaluated and documented.



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Africa Transport procedure includes a requirement to complete a new Route Risk Assessment at least annually. The following records of Route Risk Assessments were scrutinized by auditor:

- Route Risk Assessment (document # CTRD-01-V0-25 dated 13<sup>th</sup> June 2025) from Conakry port to SMD mine site.
- Route Risk Assessment (document # CTRD-02-V0-25 dated 5<sup>th</sup> January 2025) from Conakry port to Mandiana mine site.

The Route Risk Assessment procedure specifies that the route surveys and risk assessment are conducted at least on an annual basis and as when necessary.

The items used in conducting the route surveys are cameras, road map, a tape measure, a telescopic pole or laser rectangle, GSM cell phone, reserve fuel and fire extinguisher.

Recommended preventative actions to mitigate or eradicate the risks on the selected routes are included in RRA assessment documents. Within the Route Risk Assessments there is documentation of existing controls, (e.g., using bypass to avoid construction areas) and driver actions to adhere to in order to reduce the risks (e.g., use low gears, decrease speed).

Recommended preventative actions to mitigate, reduce or eradicate the risks on selected routes are included in RRA assessment document.

The Control measures include;

- Planning ahead of every operation
- Reducing speed and Exercising caution
- Adhering to speed limits
- Convoy management
- Engaging Higher gears on hills
- Daylight driving all the time
- Driver Defensive Training/Cyanide Awareness Training for drivers and escort team

Africa Transport has implemented processes to periodically re-evaluate risks in the routes used for cyanide transportation and has a process of getting feedback on the risks noted by drivers / convoy leaders during journeys to the mines. Route surveys are conducted at least annually and as and when necessary. Records of RRA's for years 2022, 2023, 2024 and 2025. After each delivery of containers to a mine escort leaders and drivers are given the opportunity to comment on areas of concern on the route or areas which are found to be unsafe to travel during the de-briefing sessions. Before the departure of a convoy, the Convoy Leader discusses in a Tool box meeting with the drivers and the escort team the hazard sighted in the previous convoy to mitigate any transportation risk.

RRAs that have been conducted revealed that different hazard types were considered and evaluated. It was evident from documentation presented that the findings with respect to road infrastructure and



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road condition were taken into consideration. Road markings on tarred road, surfaces and condition of road surface, impact of temperature on road surface, edges of tarred roads, inclines, adjoining roads and the possible effect should vehicles need to pull off the road, pitch and grade, rivers, water sources nearby and weather conditions have all been captured in the RRA.

Feuille de Route Interurbaine (Road Map Form) is used for recording and reporting feedback on the road condition. The logistics department of the transporter and the drivers complete a Debriefing form (Debriefing Retour Voyage document # PO/LOG/27. Records of debriefing forms were sighted and noted. Sampled records of completed Feuille de Route Interurbaine (Road Map Forms) were verified and noted.

Measures to reduce risks are covered in the company's Risk Assessment. The transporter Risk Assessment Procedure outlines the category of risks identified when conducting the route assessment.

The transporter conducts tools box meeting on the feedback on a regular basis prior to the start of commencement of delivery. Participants sign attendance register to indicate their presence. Records of Tools box meetings dated showing the discussions about the feedback on the road conditions and names of attendees were sighted by auditor.

The QHSE department is responsible for organizing the toolbox meetings. The meetings are attended by the drivers, escort team and the police.

A revised cyanide transport Route Risk Assessment is performed at least annually and as when is necessary. Africa Transport has documented the measures taken to address risks identified on the selected routes within the Route Risk Assessments. The state of the road which includes changes such as constructions on the road, potholes and sharp diversions which are identified after each delivery to the mine site are documented. The company's Route Risk Assessment Procedure outlines the category of risks to be identified when conducting a route assessment and risk ratings.

It was evident that Route Surveys have been conducted over the years. Recommended preventative actions to mitigate or eradicate the risks on selected route are included in RRA assessment document. The identified risk or changes on the route are discussed at tool box meetings prior to departure of the next convoy. This is to ensure that each person in the convoy get to know the current risk on the route. Attendance registers of those present during the tool box meetings are kept on record. Those who attends the meetings signs the attendance sheet to acknowledge that such training was presented. There is evidence of training attendance sheets on filed depicting the training programs.

Records of completed Feuille De Route Interurbaine and Debriefing Retour Voyage forms used to record identified risks and as well as RRAs were sighted by auditor. The RRAs have been documented for each of the destinations where deliveries are made to. The RRAs have the hazards and measures to control the risks.



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Records of feedback reports detailing risks on the road and measures to address them are all documented.

Africa Transport has sought input from various stakeholders and applicable governmental agencies in the selection of routes and development of cyanide management measures. Consultation has made with the Ministry of Transport (Ministère Des Transport) Guinea police, hospitals, gendarme, police and Ambulance service.

Records of Letters of notification to the Guinea police addressed to the Director General of Internal Intelligence (DGRI), notifications to gendarme, Dabola hospital, Civil Protection Unit, Fire brigade letter and Civil Protection were noted. As per the government regulations in Guinea, letters are written to notify the police anytime there is a convoy of sodium cyanide shipment departing the port to the mines. The police then assign a maximum of two policemen to be part of the escort team anytime there are deliveries to the mines.

The Civil Protection Unit is responsible for community consultations which is part of their mandate. The Civil Protection Unit, Gendarme and hospitals in some selected towns along the transportation route have been consulted accordingly and evidence placed on record.

The company has a valid Permit # A/2022/879/MT/CAB/SGG dated 14/03/23 which was issued to them by the Ministry of Transport. This permit grants permission for the company's transportation of cyanide and other transportation activities. The permit is valid for 3 years and renewed after the expiration of the validity.

The transporter uses escorts, convoys and additional safety and security measures when doing deliveries to the mine site destinations. Africa Transport has a Transport Management Plan (TMP) document # PRO/CNC/03 version 3 dated 03/06/2025 which that convoys and escorts are used when doing deliveries to the mines. Convoys are used as a means of helping to manage the risks on the road thereby reducing or avoiding road incidents.

As per the transporter's TMP procedure, the transportation of cyanide is strictly prohibited during the night. The allowed driving period for cyanide convoys are from 06:00hrs to 18:00hrs. The Escort leader ensures that required rest stops are respected and that convoy follow the required speed limits and correct travelling distances.

The number of trucks per convoy is four (4) with one (1) escort vehicle.

The composition of the escort team is as follows;

- 1 Escort driver
- 1 Safety Coordinator
- 2 Policemen
- 1 Customs officer



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Africa Transport does not subcontract any of the transportation of cyanide business.

## Transport Practice 1.2:

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

The operation is:

- ✓ in full compliance with Transport Practice 1.2
- o in substantial compliance
- o not in compliance

## Summarize the basis for this Finding/Deficiencies Identified

Africa Transport only uses trained, qualified, and licensed operators to operate its handling transport vehicles. The transporter has employed qualified drivers with Class C licenses to do deliveries to the mines. A driving license is valid for 5 years but renewable every 5 years.

The following are the training programs for all drivers (both old and new), escort team and other staff;

- Defensive driving
- Road Risk Evaluation
- Fatigue management
- Fire Fighting
- Cyanide Awareness training
- Emergency response and ER scenarios
- Basic First Aid
- Alcohol, medical and drugs management

All the training programs are conducted annually for all drivers, escort team and staff. Training records of the following training programs held at different in the past 3 years were sighted and noted.

- Records of Defensive driving
- Cyanide Awareness training records
- Firefighting training records
- Road risk evaluation training records
- Emergency response & ER Training records
- Basic First Aid training records
- Alcohol & drug test records



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The training programs were conducted by training company ONFPP a training company in Guinea and the QHSE Manager. The contents of the training were scrutinized by the auditor. Training Assessments of most the training was used as a tool to test drivers understanding about a particular topic discussed. Records of training assessment were sighted by auditor.

The transporter has a Recruitment procedure (Procédure de recrutement et Intégration du personnel doc# PRO/RH/01) dated 18th January 2021 version 03. The Recruitment procedure specifies a process of selecting a driver for employment. First, application is invited from qualified drivers to apply after which a pre-selection of candidates is done according to the following criteria.

- Prospective applicant should be between 23-48 years.
- He must have a valid driver's license.
- Must have a minimum of 3 years' experience
- Must have a guarantor

The prospective driver is expected to present.

- Job application
- 4 passport size photos
- Guinea Residence certificate
- Medical report
- CV
- Birth certificate
- Copy of previous work certificate
- Photocopy of identity card
- Police extract about the driver
- Valid driver's license

Prior to selection of drivers they undergo theoretical and practical test. At the end of the training qualified drivers who pass the test are appointed permanently. Appointed drivers are taken through training and mentoring. The training they undergo are aforementioned training and these have been captured in a training matrix (document # FO/RH/47 dated 30/11/2024).

Training is conducted by external company called ONFPP a training consulting company based in Guinea. Copies of cyanide training and defensive driving certificates for the drivers been placed on record. Validity of driver's licenses are checked during pre-departure checks and vehicle predeparture checklist completed. Drivers answer questions posed to them verbally after the training to ascertain their knowledge about cyanide. Yearly, emergency response scenarios are performed to ascertain the understanding of drivers and escort team during mock drills. Copies of Certificates of Defensive driving training dated 10 July 2023, 10 July 2024 and 05 January 2025 issued to the drivers were noted.



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A review of training records of drivers and escort team against the company's training matrix confirmed that personnel undertaking cyanide transportation have completed the mandated training. Selected drivers and escort team personnel who were interviewed confirmed the training system and are knowledgeable in handling of cyanide as well as convoy management. Copies of training attendance register have been retained.

Africa Transport does not subcontract Transport Practice 1.2.

### **Transport Practice 1.3:**

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

**The operation is:**

✓ **in full compliance with Transport Practice 1.3**

o **in substantial compliance**

o **not in compliance**

### **Summarize the basis for this Finding/Deficiencies Identified**

Africa Transport uses different brands of trucks. These are HOWO brand of trucks with Horsepower (HP) of 430, Renault with HP 440 and IVECO having HP of 400.

The trucks have the following configurations as per Clause 4.4(Equipment) of the Transport Management Plan;

- 6x4 with 4 axles interlink trailer to carry 2x20ft containers of cyanide (total weight of 46.4mt)
- 4x2 with 3 axle flatbed trailers to carry 1x20ft containers of cyanide (total weight of 23.2)

The maximum load capacity of the 6x4 with 4 axle trailers is 60mt whilst the 4x2 with triaxle can carry a maximum weight of 50mt.

Africa Transport has a Maintenance Procedure (Procédure de Planification Et Réalisation des travaux de maintenance document # PRO/MAN/01 version 06 dated 18th December 2023) that it follows in maintaining its vehicles. The Fleet Maintenance Plan includes both Preventive and Corrective Maintenance.

The Preventive Maintenance are;

- Vehicle inspection,
- Changing of oil and greasing,
- Tyre maintenance,



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- Trailer maintenance,
- Routine Servicing.

An inspection is conducted on the trucks upon arrival from a trip. Identified fault(s) goes through a process of raising of job order for the workshop and execution of the job, testing of the repaired vehicle and the signing off of the job request form by a mechanic and countersigned by the Maintenance Manager. Vehicles are serviced at after every 10,000Km of working time as per the manufacturer's specifications.

The transporter has a tyre management procedure (Procédure de Gestion des Pneus Et Jantes) procedure # PRO/MAN/02. The company ensures that good tyres with the right tread depth(>5mm) are used on the trucks.

The transporter's trucks have the required capacities and configurations for cyanide transportation. As per the manufacturers design, the 6x4 truck configurations with 4 axles interlink trailers have the capacity to load two containers of approximate gross weight of 46.6mt whilst the 4x2 with 3 axles carry a maximum load of gross weight of 23.3tmt. The manufacturer's manual was verified by the auditor. The manufacturer's manual was verified by the auditor and the load capacities confirmed.

The transporter ensure that trucks are not overloaded. There are procedures in place to prevent overloading of the transport vehicle being used for transporting cyanide.

Vehicles are weighed at the port of Conakry by the Guinea Port Authority before they leave the port to prevent overloading of every vehicle leaving port. An Equipment Interchange Receipt is issued covering the weight of the truck and load. Copies of the Equipment Interchange numbers were verified and noted.

The maximum load per axle of the 6x4 with 4 axles interlink is 7.1mt/axle and the axle load for the 4x2 with tri-axle is 10.1/axle which are lower that the Economic Community of West Africa States (ECOWAS) axle load regulation of 10.5mt/axle. The weights of the containers of cyanide are written on the Bill of Lading documents. The 6x4 axle with 4 axles interlink and 4x2 with 3 axles flatbed trailer have the capacity to take 2x20ft and 1x20ft containers respectively. The transporter has a fleet of 71 trucks.

The auditor examined records of weighing bridge tickets and concluded that the transport vehicles are not overloaded.

Africa Transport does not subcontract any of the above activities in Transport Practice 1.3





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## Transport Practice 1.4:

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

**The operation is:**

✓ in full compliance with Transport Practice 1.4

o in substantial compliance

o not in compliance

## **Summarize the basis for this Finding/Deficiencies Identified**

Africa Transport ensures that cyanide is transported in a manner that maintains the integrity of the producers packaging. Clause 5 of the Transport Management Plan (Doc # PRO/CNC/03 version 3) gives a vivid description of solid sodium cyanide as packaged in Intermediate Bulk Container with each box containing 1000Kg of product. The Solid sodium cyanide briquettes packaged in sacs with polyethene to prevent moisture and are encased with plywood box with an integral pallet base and is secured with a lid. The packaging conforms to the IMDG code. The IBCs are packed in 20ft standard shipping containers and are tagged with security seal for the duration of the entire transportation to the mine site.

A trail of documents namely Order of Mission, Waybills (Lettre Voiture # LV012207-2334), issued by Africa Transport, Bill of Ladings and interchange document issued by the shipping lines and the Port Authority respectively indicates the container number, general conditions of the containers and container seal numbers. Copies of interchange documents were noted. Copies of Bill of Lading numbers and sampled records waybills were verified and noted.

Upon receipt of the containers at the mine site, the mine site staff checks and ascertain whether the containers are intact and then sign off the waybill. Journey plans (document # FO/LOG/01 version 2) which shows the times the convoy stops and departs whilst on the road to the mine were noted. Waybills are signed by the mine site personnel and stamped indicating the containers are received in good condition and intact. The location of the convoys is communicated to the mine and the supplier after every 1hr interval. GPS system (Technology Center) tracks the convoy till the trucks reach the respective mines.

Signage(s) are used to identify the shipment as cyanide as required by international standards as well as the IMDG code and are conspicuously displayed on all four sides of a shipping container. Clause 7.2 Page 6 of the TMP, mentions that cyanide containers should be marked by the required placards. The cyanide manufacturer has visibly placarded all four sides of the container as required by the IMDG code of Practice. Hazard Class 6, Skull & Cross bones, UN number 1689, and Marine Pollutant labels



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are used. In addition, the transporter has put cyanide placards namely Marine Pollutant label, Toxic 6 labels and Cross bones in the front and rear of the trucks. The required signage(s) identifying the shipment as cyanide were verified and noted by auditor.

The transporter has implemented a safety program and policies for all the transportation operations.

(a) Africa Transport carries out various inspections before the convoy sets off for a trip. The inspection includes;

- Pre-departure vehicle inspection using checklist document # FO/QHSE/19
- Special Operation checklist (Fiche Operation Speciale ADR) # FO/QHSE/41
- Emergency Equipment Checklist document #CL/CNL/01
- Road vehicle inspection document (Tour Du Vehicle # FO/LOG/33)

Africa Transport has a vehicle predeparture checklist (Checklist Pre-depart). Vehicles are inspected and the checklist completed prior to departure. A work order is raised when any defect or fault picked up during the inspection and defect rectified before the convoy departs. Copies of predeparture checklist for trucks numbers for selected vehicles were noted. The checklists are signed off appropriately. Another inspection is carried out on each truck after each trip to the mine site and their return to their base. This checklist is titled "Checklist Retour. This inspection is carried out to ascertain whether there are no defects or any fault that has arisen during the trip to the mine site. Escort equipment are also inspected and Equipment Checklist is signed off by Escort Leader. Records of completed equipment checklist were noted by auditor.

(b) Africa Transport has a Maintenance Procedure (Procédure de Planification Et Réalisation Des Travaux De Maintenance) document # PRO/MAN/01 version 06 dated 18th December 2023. The company does both preventive maintenance and periodic maintenance program.

The Preventive Maintenance are;

- Changing of oil, greasing,
- Tyre maintenance,
- Trailer maintenance,
- Routine Servicing

As per clause 5.2 of the Maintenance Procedure. the transporter services its vehicle at every 10,000Km interval as per the manufacturer's specifications of the trucks.

If any fault is identified during vehicle inspection, the Maintenance Manager is immediately informed who then raises a work order and escalate it to the workshop manager. The fault is worked on and vehicle tested and the work signed off by the mechanic who worked on it and countersigned by the Workshop Manager.



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A Software application called Nimba Software which guides the company workshop in doing maintenance on the vehicles is used by the company's workshop. The software has the history of work done or scheduled work to be done on each vehicle. The software ensures that no truck is missed when its maintenance is due. The speedometer readings (in Kilometres) showing the distance each truck has covered are also recorded on the pre-departure checklist before a truck does any cyanide deliveries.

Upon return of each trip, each truck is inspected and faults identified are fixed. All vehicles are also inspected (Carnet d'Expertise Technique) every six months by the Ministry of Transport and issued certificates to prove that the vehicles are road worthy to continue to do delivery of cyanide. Copies of road worthy certificates with numbers for selected vehicles were seen.

The company has a tyre management procedure # PRO/MAN/02 version 2 dated 5/2/2020. Tyres are inspected periodically to ensure that they are in good condition. During pre-departure inspections, tyres of each vehicle in convoy are inspected and condition noted on the pre-departure checklist. Tyre inspection sheet is completed any time tyres are changed on each vehicle. It shows the brand of tyres changed, the serial numbers and where the changed tyre(s) is or are located on the tractor unit or the trailer. Tyres are replaced at 30,000Km or a tread depth of 5mm or as when necessary. No re-treaded tyres are used by the transporter.

The maintenance manager or its delegate assigns responsibility to a workshop personnel (mechanic) to rectify the defect;

- A job request Form is completed by the mechanic who carries out the job
- The vehicle is then tested to ascertain whether the work has been successfully completed
- The defect rectified is signed off on the work order form by the mechanic and countersigned by the Maintenance Manager.

The sea containers transported are not owned by the transporter. The Shipping Companies own them and are responsible for the maintenance of the sea containers.

(c) The company has a Fatigue Management Plan (Procédure de Gestion de la Fatigue) document number PRO/QHSE/11 version 02 dated 24/03/23). Clause 8 of the Fatigue Management procedure version states that drivers are to respect driving hours and take 15 minutes break for every 2hrs drive and 30 minutes for 4hrs of continuous driving. A journey plan is also used to ensure that drivers conform to the driving and resting guidelines. Clause 24 of the TMP mentions that night driving is strictly prohibited. Permitted driving hours is from 6am to 6pm. The GPS (Technology Center) is monitored by the Tracking Supervisor during each trip to ensure that the convoy conforms to all the required driving regulations till they arrive at the mine destination. Random samples of completed



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journey plans document (reference #FO/LOG/01 version 02 dated 24/05/21) showing the times of stopping for a brief rest and departure times were verified.

(d) Loading and offloading of shipping containers are the responsibility of the Guinean Port Authority and the mining companies respectively. The TMP in Clause 15 titled "Choosing trucks for Loading Operations" states that a special attention is made to ensure that twist locks and the fifth wheel are well fitted on trailers to avoid unhitching during driving. The checklist also makes provision for checking that the twist locks are firmly in place prior to the convoy's departure. During pre-departure inspection, twistlocks are inspected to ascertain whether they are in good condition. Upon stopping for rest or a brief refreshment break, twist lock as well as the entire containers are inspected and conditions documented. A checklist "Tours Du Vehicle" is completed after the inspections before the convoy continues its journey. Sampled records of completed "Tours du Vehicle with different dates were noted by the auditors.

The Convoy Leader conducts the inspection and to verify that the twist locks are firmly in place in the containers.

(e) Procedure are in place to suspend the transportation operation during to civil arrest on the route, bad weather condition, road collapse, mudslides, and any adverse conditions that will affect the convoy movement. Clause 8.7 of the TMP specifies that deliveries must be suspended during civil unrest and bad weather conditions. The decision to continue the trip is made by Convoy Leader in conjunction with the mine client and his office after the civil unrest or bad weather condition is over.

(f) The company has a Drug and Alcohol policy document # PO-DAV-03-2024) that prohibits the use of drugs and alcohol whilst at work. The company has also an Alcohol Test Procedure # PRO/QHSE/07. Alcohol test are performed periodically by the QHSE representative using the Alcoblow (Exhale Breath Digital Display Alcohol Tester). Alcohol test checklist document # FO/QHSE/40 is completed with the details of the tests performed i.e. name of driver, test result, date and signature of the QHSE person. The Alcohol test procedure details Random testing of alcohol, educating the employees about the dangers of drug, alcohol and smoking and the punishment thereof if an employee contravenes the policy. Test are performed by the QHSE representatives. Copies of completed alcohol test checklists were noted by auditor. The Alcoblow AT8801 Breathalyzer used are new and has been calibrated by the manufacturer (Hanwei). The next calibration date is 20/6/26. Consumption of alcohol and abuse of drugs whilst on duty is strictly prohibited and is punishable.

(g) Africa Transport has a retained documented evidence of the above activities and these were verified by the auditor. The operation has a Document Control Procedure (Registre de Conservation des information Documentees # FO/QHSE/03). Documents are retained for a minimum of 3 years.

The transporter does not subcontract above activity in Transport Practice 1.4.



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## **Transport Practice 1.5: Follow international standards for transportation of cyanide by sea.**

**The operation is:**

☒ **in full compliance with Transport Practice 1.5**

☐ **in substantial compliance**

☐ **not in compliance**

### **Summarize the basis for this Finding/Deficiencies Identified:**

The transporter does not transport cyanide by sea. This provision does not apply to transportation of cyanide by road using trucks.

## **Transport Practice 1.6:**

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

**The operation is:**

☒ **in full compliance with Transport Practice 1.6**

☐ **in substantial compliance**

☐ **not in compliance**

### **Summarize the basis for this Finding/Deficiencies Identified:**

The medium of communication with the mining company, producer and external and internal responders is by Cell phones (Orange mobile network) and email communication. Also, communication is via WhatsApp messages. Each driver has Walkie Talkie and Orange Mobile phones for communication purposes. Each vehicle in the convoy is fitted with a GPS tracking system. Africa Transport's GPS system is monitored 24/7 by the Tracking Supervisor.

Emergency contact list has contact cell phone numbers of all emergency responders. A list of emergency telephone numbers for the various stakeholders and emergency services were noted. Electrical chargers are available in the vehicles to fully charge the phones. Mobile phone is part of the items to inspect during the pre-departure inspections. Trucks drivers journey checklist has the inspection of the mobile phones/Walkie Talkies prior to departure of a convoy.



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Africa has a system in place to ensure that all communication equipment(s) are regularly tested and functions correctly. Communication equipment such as cell phone and GPS are installed in the tractor units of the vehicles and are inspected prior to the departure of the convoy. The GPS device is also tested by the Tracking Supervisor to ensure that they are functioning properly. Real time GPS reports of selected trucks were verified and noted by the auditor. As per Clause 21 of the transporter's Journey Management Plan # PRO/CNC/03, the mobile phones are checked and pre-departure checklist completed by the Convoy leader.

An emergency equipment checklist is completed after inspecting the communication equipment. It is the responsibility of the Convoy leader to ensure that the communication equipment's are working effectively. Sampled copies of completed emergency equipment checklist were verified.

There are no black out areas along the route that the company uses. Orange mobile network which the company uses covers the whole country. However, the drivers and escort team have multiple sim cards (MTN and Cellcom network service providers) which the convoy can fall on it in case of an unlikely event of a drop in reception of Orange mobile network.

GPS tracking system is used to track and monitor the location and progress of the cyanide shipment. The system is manned by a dedicated Tracking Supervisor. In-Vehicle Monitoring System (IVMS) have been installed in all the vehicles which monitors the actions of the drivers whilst driving. The company has a Standard Operating Procedure for tracking the company's fleet.

The procedure covers a process for tracking the vehicles on the GPS tracking system and monitoring the live feed and review of downloaded videos from the IVMS.

The Tracking Supervisor checks the status of the vehicles in the convoy, monitors alerts from the tracking platform, speed limits, checking rest stops, checking driving hours, Idling time of the vehicles, reporting of any issues or anomalies and checking of fuel consumption. Pre-alerts are sent in advance by the shipping line when the shipments arrive in the port of Conakry.

Some emails communications sent to the client and all the stakeholders prior to the commencement of a journey which shows the number of containers, the Expected Time of Arrival (ETA) to the mine site, the registration numbers of the trucks and escort vehicles were sighted.

Records of the Bill of Ladings specifying the gross weight of the sodium cyanide, were reviewed. Container Numbers, seal numbers, the gross weights of each freight container, Shipper's information, Consignee's information, description of packaging & chemical details of shipment are specified on the Bill of Ladings. Waybills are written to cover each container and these are given to the mine site representative who signs it to ensure that the containers have been received in good condition. Copies of waybills numbers as well as copies of container Interchange documents issued by the shipping lines were verified by auditor.



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Copies of Bill of Lading sent by the supplier prior to shipping the product are sent to the transporter. Bill Ladings showing the weights of container and quantity of product were verified. The Convoy leader has the supplier's Safety Data Sheet anytime the vehicles are in convoy to a mine. MSDS This was verified by the auditor.

Africa Transport does not use sub-contractors for any of activities specified in Transport Practice 1.6

## **2.0: INTERIM STORAGE: Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.**

**Transport Practice 2.1: Store cyanide in a manner that minimizes the potential for accidental releases.**

The operation is:

✓ in full compliance with Transport Practice 2.0

o in substantial compliance

o not in compliance

### **Summarize the basis for this Finding/Deficiencies Identified:**

Within the scope of this audit, there are no transshipment depots or interim storage sites as defined in the audit protocol. Africa Transport does not have a cyanide trans-shipment depot or interim storage for cyanide.

### **Transport Principle 3 – Emergency response**

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

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

The operation is:

✓ in full compliance with Transport Practice 3.1

o in substantial compliance





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## o not in compliance

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

The transporter has developed an Emergency Response Plan for the transportation of sodium cyanide (document # PRO/CNC/04 Revision 03 dated 03/06/2025).

The plan outlines the following.

- Sufficient instruction to effectively deal with a cyanide transportation emergency
- Mode of transport
- The Physical and Chemical Properties of Sodium cyanide
- Minimizing of risk to public, environment, employees, emergency response services, property and equipment.
- Roles and Responsibilities of emergency responders and other stakeholders
- Incident Scenarios and description of response actions
- First Aid and treatment
- Containment, neutralization and decontamination processes
- PPE requirements

The contents of the transporter's ERP were found to contain all the relevant information to handle cyanide emergency situations. Auditor verified the contents of the plan and its applicability.

The transporter has selected and has carried out RRA's for all the routes from Conakry – Kindia – Mamou- Dabola- Kouroussa – Kankan – Mandiana. RRAs took into consideration the general road conditions e.g. bridges, sharp curves, slopes and other road infrastructure. The ER Procedure were found to be appropriate for the activities it has been designed for as it addresses issues particularly of road transportation of the sodium cyanide.

Clause 5 of the ERP gives details the physical and chemical composition of sodium cyanide. It describes the nature of cyanide and its packaging and other chemical properties. It also describes the results of reactions when on contact with acids and other incompatible chemicals and when exposed to moisture. The plan describes the physical and chemical properties of the sodium cyanide, its placarding with UN No. 1689, Toxic Six and Marine pollutant labels. The plan further addresses the process of handling accidental release of cyanide.

The method of transport is described in clause 5 of ERP. Emergency response procedures are based on the road transportation of solid cyanide in IBCs within a 20ft shipping container using vehicles of the required configuration.

RRAs have been conducted for the transportation routes from Conakry port to the mine sites.





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The IBCs are packed in 20ft standard shipping containers and are tagged with security seal and placards for the duration of their transportation to the mine site.

The ERP considers all aspects of transport infrastructure. Transport infrastructure is covered in the RRA. and Evaluation of the route are done during route survey and infrastructure are covered route survey reports. The nature of the roads, tarred or untarred, slopes, bridges, water bodies, towns and villages are appropriately covered in the ERP.

The brands of trucks used by the transporter are HOWO, Renault and IVECO having Horsepower (HP) 430, 440 and 400 respectively. The ERP consider road transportation using the following truck configurations;

- 4x2 with 3 axle flatbed trailers to carry 1x20ft container of total weight of 23.2mt.
- 6x4 with 4 axles interlink trailer to carry 2x20ft containers of 46.4mt

The ERP includes descriptions of response actions for anticipated emergency situation. Response actions of different incident scenarios has been described comprehensively in the ERP.

Clause 10 (Emergency Exercises) of the ERP describes the response actions during emergency situations. The plan addresses the following 4 incident scenarios;

- Rollover of cyanide shipping container on dry ground without any spillage.
- Roll over of container resulting in spill on dry ground.
- Roll over of container into water body.
- Rollover of cyanide container resulting in injury and cyanide exposure.

The ERP describes the various response actions including the possible neutralization processes of each above anticipated emergency situations in Clause 15 and 16. It also highlights the mechanism of cyanide poisoning and how to administer 100% oxygen to a person exposed to cyanide before handing him over to a medical facility or Ambulance.

The ERP addresses the roles of emergency responders namely Guinea Police, Gendarme, Ambulance, Fire Service, Civil Protection and Ministry of Environment (Ministère De Environment) and the mines.

In the event of an accident the Convoy leader will notify the QHSE Manager who in turn will notify management about it. The Convoy leader is responsible for the overall management of an incident which includes neutralization and decontamination. He will notify the head office and other external responders and also ensure that the incident site is condoned off. The convoy leader is also responsible for administering 100% oxygen to a cyanide poisoned person.

The escort team will move people upwind and also condone of the area.



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The local Fire Service will be responsible for rescuing and putting off fire with the appropriate fire suppressant and also help in neutralization.

The Ambulance Service will provide First Aid and assist in conveying people to the hospital.

The Hospital will provide treatment for a cyanide poisoned person.

The responsibility of the mine is to receive and supervise destuffing of shipping containers as box may have been damaged and use product as soon as practicable.

The police will do traffic control and also prevent intruders to the incident area also accident investigation.

Civil Protection will assist in cleaning up the area of an incident and assist in rescue of a poisoned person.

The community will not play direct role when there is an incident but will be handled and given directions by the Civil Protection.

The mine will be responsible for receiving the recovered container and contaminated soils and properly neutralize. The mine will be fully involved in the recovery in case the incident occurs close to the mine site. The supplier will offer technical advice also communication with the mine site.

Auditor scrutinized the roles and responsibilities and found them to be appropriate.

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

**The operation is:**

☒ **in full compliance with Transport Practice 3.2**

☐ **in substantial compliance**

☐ **not in compliance**

### **Summarize the basis for this Finding/Deficiencies Identified:**

The transporter's Training Matrix shows annual refresher ER training which are organized for all employees. Emergency response training is held annually and drivers, escort leader, escort team and the police participates. Records of ER Training Attendance Register for the last 3 years were sighted by auditor. To ascertain the effectiveness of the training, assessment of participants is done by verbal assessments through questioning and answering verbally for drivers who are not well educated and are not conversant with the official language of Guinea which is French.



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The Emergency Response Plan identifies the specific emergency response duties and responsibilities of personnel in case of an incident. Descriptions of the specific emergency response duties and responsibilities have been clearly documented. The specific emergency response duties and responsibilities of the Convoy leader, escort team, drivers, police, fire service, Ambulance, hospitals are all outlined clearly in clause 8.1 of the ERP as per aforementioned in Transport Practice 3.1.

The transporter has cyanide emergency response equipment which are kept in the QHSE office when there are no cyanide deliveries to the mine sites. The company has a list of emergency equipment document number CL/CND/01. The names of the individual items and quantities are listed on the Escort Equipment Checklist. A list of required first aid equipment is also available and contents of equipment checked. As per the ERP, the escort equipment's are inspected at regular intervals and before a cyanide convoy departs to a mine. This is to ensure availability and operability. Records of monthly inspection carried out were verified.

The following are the list;

- Oxygen resuscitator
- Tyvek Overalls
- First Aid kits
- Full face respirator and filter (ABEK)
- HCN Gas Detector
- Spare filters
- PVC gauntlet gloves/overalls
- Rubber boots
- Safety triangles
- Convoy signs
- Cones
- Shovels
- Brooms
- Tarpaulin
- Bulk bags
- Plastic bucket
- Spray pack
- Reflector tape
- Danger flags
- Distress device
- Ferrous sulphate monohydrate
- Torch lights
- Megaphone
- Walkie Talkie
- Fire extinguishers



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The HCN gas detector was calibrated on 12<sup>th</sup> February 2025. Oxygen gas cylinder is periodically checked for Oxygen levels by the QHSE Manager to ensure it is always full. The equipment is kept under lock in the QHSE office. The QHSE Manager is responsible for the safe keeping and inspections of all the ER equipment. The Escort leader is trained in the use of the HCN gas detector and the oxygen resuscitator. Africa Transport has an arrangement with the mine sites and hospitals contacted to administer cyanide antidote. The transporter previously kept cyanide antidote as part of the escort equipment until its expiration. Currently in this recertification period, the transporter does not keep any cyanide antidotes but a suspected cyanide poisoned person is administered with 100% oxygen to sustain his/her life and then transported to the nearest hospital or mine clinic.

Africa Transport has the necessary emergency equipment and Personal Protective Equipment which are available and forms part of the escort equipment. PPEs are part of the ER equipment checklist. Personal Protective Equipment, namely, disposable Tyvek overalls, rubber boots, PVC gloves, full face respirator with canisters and helmets are available. Drivers and escort team have been trained in the correct use of PPEs. Auditor carried out thorough inspection of all the PPEs and found them available. The transporter has PPE issuing checklist (Formulaire de Register des EPI document # FO/QHSE/18) which is used to record all PPEs which are issued to personnel. PPE training is organized once in a year by the QHSE Manager.

The company has procedures to inspect emergency response equipment and assure its availability when required. Prior to delivery, the emergency equipment's are inspected by the Convoy leader and an Emergency Response Equipment Checklist (document # CL/CNL/01) completed. After the inspections are carried out on the equipment and obsolete equipment are identified, they are quickly replaced with new ones. When not in use, the Emergency equipment are kept in a designated QHSE office under lock and key and are inspected weekly.

Records of weekly equipment inspections were noted by auditor. The QHSE Manager is responsible for safe keep of the escort equipment. Records of inspection were noted.

Africa Transport does not sub-contract any of the activities in clause 3.2.



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

**The operation is:**

☒ **in full compliance with Transport Practice 3.3**

☐ **in substantial compliance**

☐ **not in compliance**

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

Africa Transport has a procedure for notifying and reporting all the stakeholders in case of an emergency. Listed in the Emergency Response procedure in Clause 25 is a table with all the names and contact phone numbers of external emergency responders. Community notification is done by the Civil Protection who will contact the affected communities in case of an incident. The ER contact list have the phone numbers and email addresses of the internal and external responders namely Police, Fire Service, Civil Protection, mine and supplier. The QHSE Manager, General Manager and the escort leader's phone numbers are part of the list of phone numbers. Clause 23(Reporting and Investigation) of the ERP states that all incidents and near misses during the transport operations are to be reported to Africa Transport QHSE Manager using phone or emails. In case of an incident, it is the responsibility of the QHSE Manager and the Escort leader to report to the relevant authorities.

The transporter has a procedure for validating internal and external emergency responders contacts. The emergency response procedure states that the contact details are updated during the review of the route assessment. Clause 23 of the ERP states that Internal and External emergency response contact numbers will be reviewed twice a year to make it current. The QHSE Manager is responsible for keeping the internal notification and external reporting procedures are kept current. Sampled phone numbers of the some of the entities namely hospitals, the mines and Civil Protection were tested to ascertain whether they are active and were found to be active.

Africa Transport has a procedure that states that significant incidents are to be reported to the International Cyanide Management Institute (ICMI) within 24hrs.

The following are significant incidents mentioned in clause 23(Reporting and investigation) of the ERP.

- Human exposure that requires action by an emergency response team, such as decontamination or treatment.
- An unauthorized discharge that enters natural surface waters, on or off site.
- An on-site release requiring the intervention of an emergency response team.
- A transport incident requiring an emergency response in the event of a release of cyanide.



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- A multiple wildlife death event where cyanide is known or credibly suspected to be the cause of death.
- Unauthorized release that occurs off-site or migrates off-site.
- Theft of cyanide.

The procedure for notification to ICMI in the event of a significant incident was read and noted by auditor. Africa Transport has not recorded any cyanide transportation incident since that past 3 years and since they started the transportation of cyanide.

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

**The operation is:**

☒ **in full compliance with Transport Practice 3.4**

☐ **in substantial compliance**

☐ **not in compliance**

### **Summarize the basis for this Finding/Deficiencies Identified:**

Africa Transport has procedures for remediation, 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. The transporter has developed neutralization procedure which explains the process of using Ferrous sulphate monohydrate or sodium hypochlorite.

Clauses 18 to 20 of the ERP (# PRO/CNC/04) describes how to effectively use either Ferrous sulphate in neutralizing residues of cyanide, the use of Sodium hypochlorite in neutralization of contaminated PPEs and cyanide solution (not surface water). The ERP describes the appropriate use of the neutralizing chemicals.

The procedure states that in containing a cyanide spill, the escort team will ensure the spill is prevented from entering water ways. In case a spill on dry ground the briquettes of cyanide will be shovelled into a sealable container. The residue will be neutralized with Ferrous sulphate. The initial clean-up will be the responsibility of the Convoy leader. In the case of a large spill of product, the escort leader will take the initial response and then call in the outside responders to assist.

Any contaminated soil or product removed during clean-up will be handed over to the mine Emergency Response Team to dispose it off appropriately. In case of a spill into a river the procedure mentions that the Civil Protection and Ministry of Environment will be notified and in conjunction with



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the company inform the villages and town downstream to avoid using the water and alternative water supply given to them. Sample of the river will be taken and tested regularly by Civil Protection till it declared safe. No neutralizing chemical will be introduced into the water body. The procedure was scrutinized and noted by auditor.

Clause 20 of Africa Transport ERP prohibits the use of neutralizing chemicals such as Ferrous sulphate, Hydrogen peroxide and Sodium hypochlorite to treat cyanide that has been released into surface waters. This statement was noted by auditor.

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

The operation is:

✓ in full compliance with Transport Practice 3.5

o in substantial compliance

o not in compliance

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

The operation has made provision for periodic review of the ERP. Clause 6 of ERP mentions that the ERP is reviewed at least every two years or when changes to system or procedures makes it necessary. The biennial review will be initiated and based mainly on Africa transport document control system. In case of any transportation incident and an investigation report is issued, the QHSE Manager reviews and update the emergency response procedure. The procedure reiterate that the revision and update is also based on findings from yearly mock drills conducted by the QHSE team. The ERP has been reviewed twice with a current reviewed date of 03/06/25.

Clause 10 (Emergency Exercises) of ERP makes provision for biannual emergency response drill exercises. Cyanide Emergency exercises are conducted biannually involving drivers, escort team and logistics department. The drill is organized by the QHSE department of the company and the QHSE Manager is responsible for developing the strategies and training outcomes. The training matrix also makes provision for emergency drills to be conducted biannually. Mock drill was conducted on 22nd June, 2025, 17 May 2024 and 12 April 2023. Mock drills which were performed are related to the aforementioned anticipated emergency scenarios and it includes responses to both exposures and releases. Separate drills were performed with the involvement of the drivers, escort team and the police. The simulations included handling of a cyanide poisoned persons and cyanide spills.

Mock drill report for the aforementioned dates was scrutinized and noted. A review of mock drill reports and interviews confirmed that mock drills have been duly conducted.



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The transporter evaluates the emergency response plan's performance from lessons learnt from the mock drills or when there are changes to conditions of the routes and corrective actions after a minor or significant incident as well as inputs from participants after a mock drill. Clause 6 of ERP makes provision for periodically reviewing and evaluation of the procedures. Records of mock drill reports show that mock drills were repeated to ensure that any non-conformities are rectified.

**END OF REPORT**