

SUMMARY AUDIT REPORT

Movis Logistics Limited. Tema. Ghana. Cyanide Warehouse Certification Audit.

Summary Audit Report.

Report submitted to:-
International Cyanide Management Institute.
1400 I Street, NW, Suite 550
Washington. DC 20005
Unites Sates of America.

Report of:-
Movis Logistics Limited
No. 1 Movis Bereau
Plot No. WD/A/36/2B
Off Harbour Road,
Heavy Industrial area
Community 9,
Tema. Ghana.

Movis Logistics Warehouse
Name of facility



Signature of Lead Auditor

31stAugust 2023
Date

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1.0 INTRODUCTION

1.1 Operational information.

Name of warehouse facility : Movis Logistics Limited

Name of facility owner : Movis Logistics Limited

Name of facility operator. : Movis Logistics Limited

Name of responsible manager : Mr. Joshua Gbloe

Address : Movis Logistics Limited
: Head Office (Tema)
: No. 1 Movis Bereau
Plot No. WD/A/36/2B
Off Harbour Road,
Heavy Industrial area
Community 9,
Tema. Ghana.

State / Province : Tema

Country. : Ghana

Telephone. : +233204721652

E-mail. : www.movislogistics.com

1.2 Audit scope.

The audit covers the warehousing of sodium cyanide solid from the Port to mining companies in Ghana and Burkina Faso. Consignor of the sodium cyanide is Samsung C & T.

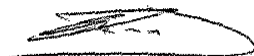
1.3 Operation Location Detail and Description.

MOVIS Logistics Ltd (MLL) was birthed out of MOVIS Ghana Ltd in 2017 to meet the Strategic Intent of the Visionary to venture into the Mining Projects and Oil and Gas space and also to meet the Local Content Laws of the Republic of Ghana. MOVIS Logistics is one of the top 5 vibrant wholly owned Logistics Companies in the Country.

MOVIS Logistics operates 3 offices between Ghana and Burkina Faso with an employee strength of about 37 Professionals providing various kinds of support to its customers.

The main office is at Tema Community 9, Ghana whiles its Airfreight branch is at the Kotoka International Airport area, Accra.

MOVIS Logistics as a Brand in the Logistics Space in Ghana has seen significant growth and successes from its inception in 2017 till date.



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The company serves clients who are mainly in Projects, Mining and Oil & Gas Sectors. Movis Logistics Limited is involved in customs clearing and freight forwarding of different chemicals including sodium cyanide and its transportation to mine site destinations.

MLL has a Ghana Environmental Protection permit No. TM20301L dated 28th March 2023 issued by the Environmental Protection Agency of Ghana. The permit is subject to renewal annually. The permit expires 28th March 2024. Yearly environmental report is sent EPA by Movis Logistics.

Other government permits such as Business Operation permit number TMA0000660 dated 24th February 2023 has been obtained from the local assembly (Tema Municipal Assembly) which is valid for 1 year and a Fire permit issued by the Ghana National Fire Services. All these permits were noted.

Cyanide Warehousing.

Movis cyanide warehouse is in Tema, a town with approximately 28 kilometers from Accra in the western side of West Africa. The size of the warehouse is 600 square meters with corrugated iron sheeting roof and cement brick walls.

Tema is the eleventh most populous settlement in Ghana, with a population of approximately 161,612 people. The warehouse is about 3 kilometers from the closest community dwellings. No water source close nearby.

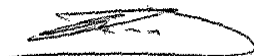
The warehouse is made up of one compartment with walls built up bricks and cement walls from ground to roof height. The warehouse is fitted with air vents and four electrical extraction fans. All these vents are placed close to the top of the northern and southern boundary walls. These vents are to allow heated air and fumes that may be generated within the warehouse to escape into the atmosphere. This warehouse is used for the temporary storage of full sodium cyanide one (1) ton Intermediate Bulk Containers (IBC's) received from Samsung via the port of Tema for the mines.

There is no secondary containment because the facility does not handle liquid cyanide. The warehouse construction is watertight equipped with air vents to the top of the walls with no windows with manually operated sliding door. Transparent sheets fitted between iron sheeting in the rooftop allow for artificial lights into the warehouse.

Cyanide is delivered by ship to the port at Tema of which some cyanide been transported and stored in the warehouse. The other consignment taken directly to the mine sites.

Structural Integrity Assessment was conducted at the warehouse by a qualified architect. Annual Assessment report, Structural Integrity Report, Environmental Protection Permit report, Ghana National Fire Services certificate available and on file.

An Environmental Protection Agency of Ghana (EPA) permit No. TMCI 003723-01 dated 13th December 2022 was noted. Permit valid till 8th February 2024. Ghana National fire permit number TC20301L dated 14th December 22 valid for one year. The next renewal date is 13th December 2024. The Business Operation permit number TMA0000880 dated 24th February 2023 obtained from the local assembly (Tema Municipal Assembly) found to be valid for a period of 1 year.



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Cyanide is packaged in one-ton polypropylene lined timber boxes which are destuffed from the sea freight containers at the warehouse and stored on concrete flooring in the warehouse. Destuffing from the freight containers is done by forklift of which the drivers have been fully trained and certified competent. Training was presented by an external certified service provider.

The IBC's are stored there until required by the one of the mine sites. Upon request from the mine, the cyanide boxes are removed from the warehouse, using a forklift, and packed into shipping freight containers. Twenty (20) IBC's are stacked into a 6 meter freight container. Once the containers are fully loaded, the doors are locked and sealed for road transport to the mine site.

The Movis yard is secured with a 1.8-meter-high built-up wall with coiled barbed wire fencing on top and electrified wire installed through the center of the wire coils. The premises is manned 24/7 by G4S armed security guards. Three during the day and three during night. At night time, guards perform foot patrols in the complex. High raised lights used to light the area at night.

At the time of the audit, boxes of cyanide were present within the warehouse. The "first in first out" (FIFO) system followed to prevent "old" stock remaining in the warehouse.

Auditor's Findings and Attestation.

This operation is

In full compliance with

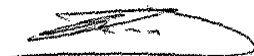
In substantial compliance with

Not in compliance with

with the International Cyanide Management Code.

Compliance Statement.

This operation has not experienced any non-compliance issues or significant cyanide incidents since the commencement of operations.



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Auditor Information.

Audit Company: Tommie Müller - South Africa.

Lead Auditor: Tommie Müller

Lead Auditor E-mail: tommieb.muller@gmail.com

Names and signatures of other Auditors: None.

Auditor 1:

Name (Print / Type)

Signature

Auditor 2:

Name (Print / Type)

Signature

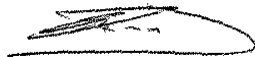
Auditor 3:

Name (Print / Type)

Signature

Dates of Audit: This audit was conducted in the period of 22nd to 24th July 2023.

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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.

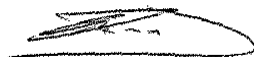
I attest that this Summary Audit Report accurately describes the findings of the certification audit. I further attest that the certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Cyanide Production / Warehouse Verification Protocol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



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Principles and Standards of Practice.

1. OPERATIONS: *Design, construct and operate cyanide warehouse facilities to prevent release of cyanide.*

Standard of Practice 1.1: *Design and construct cyanide warehouse facilities consistent with sound, accepted engineering practices and quality control/quality assurance procedures.*

in full compliance with

The operation is in substantial compliance with Production Practice 1.1
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The warehouse is in Tema Heavy Industrial Area. The size of the warehouse is 600 square meters roofed with metal traces and iron sheets. A transparent roofing sheets are in the middle of the roof to allow light into the warehouse. Patmos HS Limited designed the plan of the warehouse. The warehouse area is about 3Km from the nearest residence. No water sources close to the warehouse.

The building plans of the warehouse were sighted and matches with the physical structure. The roof is made up of corrugated iron roofing sheets. The warehouse has a pitch roof. There are vents on two walls of the warehouse. The size of the vents is 5m by 1meter. The warehouse is built with cement concrete. The height of the warehouse is 7.27meters from floor level to the tip of the pitch. There are four extractor fans to provide additional ventilation into it. The expansion gaps in concrete flooring are sealed off to prevent possible seepages of product into the ground.

The warehouse drawings were done by a company Patmos HS Limited a professional building designing and construction company based in Tema. The warehouse was found to be suitable for storage of sodium cyanide in briquette form. The warehouse plan was drawn in July 2022. The warehouse is located on 2.1 acres land. The lease agreement for the land was dated 31/1/83.

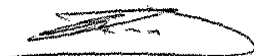
The facility has quality control and quality assurance records that has been retained. Approved building plans and plan of land was approved by Tema Metropolitan Assembly.

Building plans and Structural Integrity Assessment report were noted by auditor. Ghana Environmental Protection Agency has issued a permit for the warehouse. The EPA permit certificate was sighted and noted. Structural Integrity Assessment was conducted at the warehouse by a qualified Civil Engineer S.S. Adi. Structural Integrity report dated 18/7/2023 was sighted by auditor.

The facility has a quality control and quality assurance records that has been retained. Approved building plans, approved by Tema Metropolitan Assembly were sighted.

The two warehouse doors are sliding doors and are manually operated (opened or closed). The warehouse doors are kept closed at all times except when cyanide is destuffed from sea containers and taken into warehouse or when IBC's are taken out of the warehouse to be loaded into a freight container to be delivered to a mine. No automatic shutdown of doors installed. In the event of a electrical power outage doors can be closed manually. One standby electrical generator is available. Power outages cannot be the cause of any cyanide releases. The standby generator is only used for lighting the warehouse when the national grid goes off. Working hours at the warehouse in only day light hours. There are no secondary containments and no storage tanks and pipelines for solution cyanide as only the operations involved storage of solid sodium cyanide in IBCs.

The IBC's stored inside the warehouse are all intact and in good condition. No opened or damaged IBC's are kept in the in the warehouse. The warehouse structure is well constructed and no leakage of water from the



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roof into and onto the packaging. No destuffing of IBC's from or loading of packaging into a sea freight container during raining days or if there is any sign that it is going to rain soon. Doors are kept closed and locked when warehouse is not in use to prevent any moisture entering or getting in contact with cyanide packaging inside the warehouse. All these measures are in place to prevent exposure of the cyanide to moisture.

The warehouse has 7 vents close to the roof plus 4 electrical extraction fans close to the roof of the warehouse which allows air to ventilate through the warehouse thereby reduce the built-up of cyanide dust and hydrogen cyanide gas inside the warehouse.

The warehouse is walled with a gate manned 24/7 by G4S (a private security service provider) security personnel. Three officers on duty during the day and 3 during the night. Guards roaming the premises. There is electrical fence and barbed wire on the walls to prevent any intruder climbing over the wall to enter the premises and the warehouse. The warehouse is secured and access is prohibited without entry permission.

Only sodium cyanide in briquette form in IBC's are stored in warehouse. No other chemicals are stored inside warehouse with cyanide.

Standard of Practice 1.2: Develop and implement plans and procedures to operate cyanide warehouse facilities in a manner that prevents accidental releases.

in full compliance with

The operation is in substantial compliance with Production Practice 1.2

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Movis Logistics (MLL) has developed and implemented plans and procedure to operate the warehouse facilities. The facility has procedures in managing the warehouse to ensure its environmentally sound operation.

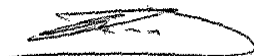
Movis Logistics has the following Standard Operating procedures (SOP) in the Emergency response plan.

- Loading and offloading procedure
- Hydrogen Cyanide Gas Monitoring procedure
- Emergency response and Evacuation
- Equipment Maintenance procedures
- Decontamination of Personal Protective Equipment
- Neutralization procedure
- Change Management Procedure
- Maintenance procedure
- Security and Access Control procedure

Offloading and loading of packed cargo are not carried out when the weather condition is not favorable i.e. in a rainy day or when rain is predicted.

The following in the warehouse have been considered as hot spots in the warehouse.

- The packing area for the cyanide IBC's inside the warehouse - medium risk
- Loading and offloading point outside in front of the warehouse. - medium risk.



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The HCN monitoring procedure specifies that the threshold limit for cyanide should not exceed 4.7ppm. Procedure for the monitoring of the HCN was verified.

The operation conducts weekly inspection in and around the warehouse. Tools box meetings are held weekly at the warehouse for all warehouse personnel.

All warehouse personnel have been trained in cyanide awareness and emergency response. Procedures for safe and environmentally sound operations and HCN gas monitoring results were verified and noted.

The facility has contingency plans for non-standard operating situations that may present a potential for cyanide exposures or releases. The facility has an Emergency Response and Evacuation procedure which considered the following anticipated emergencies and the measures to take during upsets in its activities;

- Medical emergency
- Severe weather
- Bomb threat
- Chemical spill
- Earthquakes
- Civil disorder
- Power outages
- Armed confrontation & Terrorist attack/Hostage taking
- Fire
- Terrorist attack/hostage taking

Each of the above instances have been clearly spelt out in the ERP. Up till date no product spill / loss has been experienced.

MLL have a procedure which identifies when site operating practices have or will be changed from those on which the original design and operating practices were predicated.

Clause 2 of the change management procedure mentions the following;

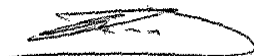
- Change in legal and other requirements,
- Changes in knowledge or information about hazards and related OH&S risks
- Developments in knowledge and technology.
- Change in personnel
- Change in work processes, procedures, equipment or organizational structure.

The HSE Manager is responsible for training employees when procedures changes.

The operation has a preventive maintenance program in place. Certificates of load test sighted by auditor. The operation has 2.5T, 5T and 28T forklifts. 28T forklifts inspected and passed by an independent company called Unit Inspection Company Ltd. The 28T forklift is rented from Patrick Logistics. The servicing of the 2.5T and 5T are done by Lucman Services Limited. The hours on the 2.5t forklift when it was last serviced is 11,577 hours and 5t is 2,396.7 hours.

The forklift is serviced within an interval of 250 hours. Load test is done by a company called Unit Inspection based in Accra, Ghana. The latest inspection of the 2.5t and 5t was 18th July 2023. Certificate numbers for the 2.5t and 5t are UIC/2/2023 and 5T UIC/ML/3/2023 respectively were sighted by auditor. Load test was performed on the 28t forklift is by Patrick Logistics Limited. A certificate of inspection was noted. The 28t forklift is serviced monthly.

This facility does not have any chemical processes that requires monitoring. However, HCN gas monitor with serial number ARPE0329 has been calibrated to ensure proper functioning and readings are accurate. HCN Gas monitoring is done weekly and a Weekly HCN gas monitoring control sheet completed. The HCN gas detector was calibrated by an external company, Reiss & Co. Ltd. The latest calibration done on the HCN gas



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monitor was on 4th July 2023. The next calibration date is 4th January 2024.

The facility only handles solid sodium cyanide and not a production plant and no liquid cyanide handled. In addition, no liquid cyanide or any other chemical or product are stored in the warehouse. Currently only solid sodium cyanide in IBC's is stored in the warehouse. No loading or offloading of IBC's are carried during rainy days or when potential for rain is predicted.

MLL does not handle cyanide waste or cyanide packaging materials. However, provision is made in the company's Cyanide Management Plan (MLL-WH-HSE-OPS-SOP-0001) that in case the mining client contracts MLL to handle cyanide packaging waste, the waste materials will be sent to Africhem an accredited incinerating plant in Ghana for disposal.

The weekly inspection requires that the HSE Officer is responsible for the inspection of the overall condition of packaging, damages of the packaging and the labels displayed on all the IBCs. Labelling displayed on the packaging must correspond with the contents of the IBCs. Any defects noted on the IBC's are to be reported to the warehouse supervisor, the mine site and the supplier accordingly.

Standard of Practice 1.3: *Inspect cyanide warehouse facilities to ensure their integrity and prevent accidental releases.*

in full compliance with

The operation is in substantial compliance with Production Practice 1.3
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

MLL facility is not a production facility but only warehousing of solid sodium cyanide in IBCs are stored there. However, there are provisions for inspections in the warehouse. The safety manager assigned to the warehouse does monthly safety inspections in all areas of the warehouse. Monthly inspection reports were noted.

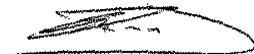
The operations Loading and Offloading procedure specifies the inspection of containers and IBC's and a load assessment form completed. Inspection of IBC.s and shipping containers are part of the loading process. A load assessment checklist specifies the inspection of containers to ensure its integrity.

The general condition of the containers is checked. The Safety Manager is responsible for the inspection of the containers. Specific things checked on the containers are: -

- placards on the 4 sides,
- rust;
- dents;
- the seal numbers; and
- the container numbers.
- [damage to container](#)
- Checks to conform with the details on the Bill of Lading.

The following inspections are carried out in the warehouse;

- First Aid inspection - monthly
- Warehouse inspections - monthly
- Emergency Response Equipment - monthly
- Cyanide emergency equipment - monthly
- Firefighting equipment i- monthly



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- Emergency shower and Eyewash facility - daily.
- HCN gas monitoring inside warehouse and at loading / off-loading area - weekly

The Safety Manager is responsible for the inspections. Records of the above inspection reports, checklists and corrective actions were scrutinized and found to be up to date. Evidence proved that records have been retained. Deficiencies noted during inspections are acted upon immediately and defects rectified.

2. WORKER SAFETY: *Protect workers' health and safety from exposure to cyanide.*

Standard of Practice 2.1: *Develop and implement procedures to protect plant personnel from exposure to cyanide.*

in full compliance with

The operation is in substantial compliance with Production Practice 2.1

 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The facility has developed and implemented operational procedures to protect warehouse employees or minimizes them from cyanide exposure during normal warehouse operations.

Clause 4.1.3.2 to 4.1.3.9 of the ERP addresses non-routine emergency operations. The main activities undertaken at the warehouse are the operation of forklift to load into and destuffing of IBC's from sea freight containers. For the loading and offloading of sea freight containers containing sodium cyanide IBCs from vehicles, a 28-ton forklift is used. A 2.5-ton forklift used for the destuffing of boxes from containers and when required loading boxes into containers for deliveries to the mine.

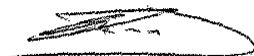
The Emergency response plan addresses severe weather conditions and natural disasters. All employees working at the warehouse are trained in the contents of the ER procedure which includes the content of product Safety Data Sheet (SDS). The Ghana Meteorological Service issues daily warning of severe weather conditions on the radio, electronic media or sometimes by circulars. Clauses 4.1.3.2 to 4.1.3.9 of Company's ER Plan addresses the actions to be taken during non-routine emergency operations. Emergency telephone numbers of stakeholders are available in Emergency Response Plan.

Maintenance and servicing of the 28-ton forklift is done monthly by owner Patrick Logistics (external service provider). The 2.5- and 5-ton forklifts are serviced every 250 hours by Lucman Services. The servicing of MLL own forklifts is done at 250 hours intervals.

Load testing done by company Unit Inspection Company based Accra, Ghana. Load tests of 2.5 and 5 tonner forklifts were carried out on 18th July 2023 with certificates numbers UIC/ML/2/2023 for 2.5 tonner and UIC/ML/3/29023 for the 5-tonner forklift. The 28 tonner load tests done on 30/9/2022 with certificate number UIC/PLLK/8/2022 This forklift is serviced monthly by owner Patrick Logistics. Proof of servicing provided by owner was noted.

The facility has a stand by generator that is serviced every six (6) months.

As per the ER procedure, the required PPE's such as full-face respirator with canister, tyvek disposal overalls, PVC gloves and safety boots are to be used. During walk-about all employees were seen wearing the prescribed PPE.



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The facility has a "Change of Management" procedure (MLL-HSE-SOP-040) which addresses changes on work processes or procedures. Clause 6 of the Change Management document mentions that input is sought from employees and the workers will participate as required in the implementation of the procedure. Employees inputs are sought during toolbox meetings and during training sessions.

The worker inputs are incorporated into the work procedures at the cyanide warehouse upon approval. Any worker having any suggestion or any general information related to cyanide activities to upgrade the work ethics of the workplace can drop their suggestions into a suggestion box, provided in front of the office block. Planned task observations are held when a new procedure or system is implemented to determine the shortfalls in the processes and procedures. Tools box meetings are held on cyanide weekly.

The facility has identified areas and activities where workers may be exposed to hydrogen cyanide gas. The Health & Safety Manager is responsible for the conducting of HCN gas monitoring in all the identified Cyanide Hot Spots areas in the warehouse. This is done at least once a week or [as and](#) when necessary.

Hot spot areas in the warehouse have been clearly designated. The following areas in the warehouse have been identified in the ER and Evacuation procedure: -

- The packing area for Cyanide in IBC's or of boxes as a medium risk area.
- The loading and offloading point as a medium risk.

Records of weekly monitoring indicates that the maximum HCN gas ever recorded is 0.0ppm. It is required that the HSE Manager who performs the HCN gas monitoring in the Hot Spots area wears the required PPE's. The procedure mentions the wearing of the required PPE's when the level of HCN gas exceeds 10ppm on an instantaneous basis and 4.7 over an 8hrs work. A calibrated HCN gas monitor is used. The HCN gas detector is inspected and tested weekly. Readings captured on file No. MLL-HSE-OPS-F-20. Weekly inspection checklist completed. Records of monthly inspection of emergency equipment includes the HCN gas monitoring device.

The warehouse manager and the safety manager have been trained in the use of the HCN detector. When the presence of HCN gas exceeds 4.7 ppm, all offloading / loading activities are to be ceased. The immediate area is cleared of personnel and the matter reported to the Managing Director.

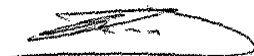
A man down alarm is installed in front of the warehouse. The buddy system is used when offloading and loading is done. When an employee and a buddy are working in an area and HCN gas levels rises above 4.7 ppm the portable HCN gas monitor will sound an audible alarm. When this occurs, employees evacuate the area immediately and move to a zone where HCN gas concentration is zero or less than 4.7 ppm. (Stay upwind). The "buddy" monitors the entire offloading and loading process and provide first aid assistance when necessary. The two should always be in constant contact (visual communication) with the team / person inside the warehouse during offloading and loading of the cyanide boxes.

In a situation where a worker is required stay or work in an area where the HCN level is above 4.7 ppm, the worker must put on full PPE including full face respirator with canister.

MLL has a "Fitness to work procedure" which specifies that employees undergo medical checks upon employment and once every two-yearly medical check to assess the state of health of the employees. Pre-employment Medical examinations are carried out on workers prior to employment includes ability to use full face respirator with canister. [Medical examinations are carried out at an accredited medical facility.](#)

MLL has a drug & alcohol policy, which includes workplace testing for drugs and alcohol during the period of employment as well as following any worker being involved in an accident. A Drager Alcotest 5000 Breathalyzer with serial number ARPV 0210 is used to perform alcohol testing.

MLL has a "Clothe Change" procedure for employees, contractors and visitors. The procedure states that



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personnel working in the warehouse are to change from their personal clothing into the required PPE's before beginning the process of loading and offloading. Clothing used for cyanide activities are kept away and washed with soap and running water in the premises of the warehouse. The procedure cautions that under no circumstances should any PPE be sent home for washing. Obsolete PPE is immediately replaced with new issue.

The MLL warehouse has appropriate international safety warning signs posted on the frontage. Applicable symbolic safety signage is displayed at main entrance to the facility, at the entrance to warehouse as well as on various places inside the facility. Signs such as Skull & Cross Bones, Hazard class 6, Marine pollutant, "Cyanide storage area", no eating, no drinking, no smoking, hard hat, eye protection, hand protection, overall, mask, safety shoes and gum boots are pasted at visible locations on the warehouse facility. The emergency safety shower and eyewash facility have been visibly pasted on the warehouse facility showing where they are located. Signages conform to the Ghana and international requirements. Written signage is printed in English. English being the official business language in Ghana. All employees are conversant in English.

All personnel are prohibited from smoking, eating and drinking, and having open flames in areas where there is the potential for cyanide contamination. This is also stressed in the Emergency Response Plan as well as in the Induction training that smoking, eating and drinking, and having open flames on site is forbidden. During walk-about inspection the applicable signage's were sighted on the facility and are clearly visible.

Standard of Practice 2.2: *Develop and implement plans and procedures for rapid and effective response to cyanide exposure.*

in full compliance with

The operation is in substantial compliance with Production Practice 2.2
 not in compliance with

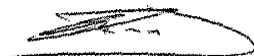
Summarize the basis for this Finding/Deficiencies Identified:

MLL has an Emergency Response and Evacuation procedure number MLL-WH-HSE-OPS-SOP-004 dated 21/10/22. The ER plan was scrutinized and found to be appropriate. It addresses all the response to possible emergency situations.

All warehouse employees have been trained in emergency response. An employee exposed to cyanide is transported to the hospital either by ambulance or by company vehicle. The company has arrangement with a hospital i.e. Empat-Caiquo Medicals center to treat any cyanide victim and to also provide them with ambulance services when needed. The Ghana police, Ghana Fire Service, EPA and NADMO(National Disaster Management Organization) are listed in the company's written plan as external responders. The hospital's role is to provide and administer the cyanide antidote (Hydroxycobalamine) to cyanide victims. Empat-Caiquo hospital have indicated its willingness and ability to deal with such emergencies in a letter signed by the medical director. MLL has emergency contact details in the ERP showing all the various emergency responders.

One safety shower and eye wash combined is available and located about 10 meters from the entrance to the warehouse. 4x 6Kg DCP fire extinguishers are available and located strategically close to the entrance of the warehouse. Positions of these safety devices are clearly marked by displaying of the appropriate symbolic safety signage.

Fire extinguishers are serviced yearly by accredited external service provider namely National Wide Fire



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Safety Limited based in Accra. Servicing done in accordance to the Ghana National Fire Services Act, Act 53 of 1997. Fire Certificate number TC20301L dated 14th December 2023 was noted. Service stickers noted on extinguisher's casing. Fire extinguishers are inspected monthly and the safety shower daily. Inspections are done by HSE Manger and findings recorded on appropriate registers.

MLL has cyanide antidote (Hydroxycobalamine) to administer to a cyanide victim. The available Hydroxycobalamine has an expiry date of 26/1/24. The cyanide antidote is stored at a temperature of around 25 degrees Celsius, as per the manufacturer's specification. The antidotes are carried with a cyanide victim to the hospital and administered by a registered doctor. There are 4 full face respirators with canister (A2B2E2K1 type). The facility has two (2) 5 liters medical oxygen cylinders which can be used to resuscitate a cyanide poisoned person whilst on the way to the hospital for further medical treatment. Telephone communication between with hospital and police is by use of a cellular phone. The contact phone numbers of all relevant stakeholders are contained in the ERP. The emergency contact numbers of all the emergency responders are pasted in the Company's reception area, security office and the entrance of the cyanide warehouse.

One fully equipped general first aid box available at the warehouse. The HSE Manager is responsible for the checking of the stock inside the first aid box. Two trained first aid service providers been utilized namely Ghana Red Cross and St Johns Ambulance. Fifteen training certificates were noted and all valid. Six (6) warehouse employees and nine (9) G4S Security Officers. Test report for oxygen cylinder issued by the Takoradi Gas. All employees are aware of the location where the first aid box is kept.

Storage of the cyanide antidote and the calibration of the HCN gas monitor is done in accordance to the directions of the manufacturer's recommendations.

First aid equipment is checked and inspected on a monthly basis as directed by their manufacturer. This is done to assure that it is available when needed. Clause 5.2 of the Emergency response procedure states that equipment must be checked monthly and as and when necessary. The first aid equipment is checked monthly and obsolete ones replaced. A First Aid Inspection checklist (MLL-HSE-SOP-F-027) and Emergency Equipment Checklist (MLL-HSE-OPS-006-D007) are completed after the inspection. The facility has two appointed First Aiders. The other 4 trained employees can provide first aid when required to support the appointees.

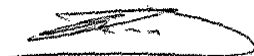
The medical oxygen cylinders were inspected and tested by Takoradi Gas and service stickers with dated of inspected pasted on them. The first-aid and emergency response equipment are stored in the warehouse office complex where it is protected against heat and moisture.

The supplier's SDS procedure, instructions, notice written in English are pasted in front of the warehouse. The SDS is available to all employees and copies of the SDS are kept at the reception. The product SDS is in English which is one of the official languages of Ghana and which are understood by all employees.

Employees of the warehouse been suspected of having their skin been contaminated with cyanide dust, will have to wash their hands and thereafter having to remove contaminated clothing, shower off the dust, footwear and wrist watch from patient. The ERP requires that every visitor to wash the hands thoroughly before leaving the warehouse.

Warehouse staff only operates during day shift. The hospital (Empat - Caiquo) is about 10 minutes' drive away from the warehouse facility. Patients can be sent directly from the warehouse to the hospital by ambulance. Should no ambulance be available, a Company vehicle is always available on standby. The cyanide antidote is carried with the patient to the hospital. The hospital is equipped with oxygen resuscitator and medical equipment to treat cyanide cases. The Warehouse staff is made up of 9 own employees plus three (3) G4S Security Officers during day shift. At night three (3) Security Officers on site as this operation is a day shift operation only.

All employees working at this facility have attended a standard first aid course presented by Ghana Red Cross and St John's Ambulance. ER Plan refers to the administering of medical oxygen only. Emergency telephone numbers are displayed in front of the warehouse, reception, and the security office. Auditor sighted all First Aid and ER equipment.



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The company does not have its own ambulance. Should it be required that a cyanide exposed employee must be transported to the hospital, such patient can be transported to a hospital with Company vehicle which is always available at the warehouse. Ambulance services can be called upon from Empat-Caiquo Hospital which is about 10minutes away from the company premises.

Letter of notification addressed to Empat - Caiquo hospital management, requesting their services / assistance to treat a cyanide effected patient at the hospital was noted. Letter dated 5th November 2022 indicated acknowledgement and signed by the medical director of Empat-Caiquo hospital, was sighted by auditor.

The HSE Manager does an initial assessment of the condition of the cyanide exposed person and thereafter reports the incident to the medical facility to where the patient will be transported as well as the condition of the patient. The medical facilities written reply dated 20th November 2022 indicating their willingness and ability to treat a cyanide poisoned person was noted by the auditor.

MLL has an Incident Reporting and Investigation Procedure number MLL-HSE-OPS-SOP-024 dated 15th June 2022. Incidents, near-misses and emergencies during the storage or handling of sodium cyanide, be reported to the HSE Manager. Cyanide related incidents are also reported to the supplier, the mine site and the ICMI. Accidents are investigated by the Company's HSE Manager and team of investigators.

The purpose of investigations is to:

- Gather evidence which includes incident statement by the casualty and taking of photographs.
- Find the immediate, root cause/s of the incidents.
- To determine possible non-compliance with Legal and or Company requirements or procedures,
- Identify any deficiencies in the management systems.

From these findings appropriate preventative and corrective measures recommended to be implemented to prevent recurrence of a similar incident in the future. Reported incidents are recorded in an incident register. Copies of incident report is to be submitted to the mine sites, the cyanide supplier / manufacturer, the Ghana Environmental Protection Agency (EPA) and ICMI.

The lesson learnt from the outcome of the incident / accident investigation, are used to update the ERP and other procedures.

No cyanide incident has been recorded since the warehouse operation started.

3. MONITORING: *Ensure that process controls are protective of the environment.*

Standard of Practice 3.1: *Conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.*

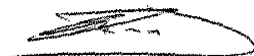
in full compliance with

The operation is in substantial compliance with Production Practice 3.1

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Question 1(a) & (b) is not applicable to this facility as no process activities undertaken at this facility.



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There are no direct and indirect discharges of cyanide contaminated solution into surface waters. The facility does not generate any cyanide contaminated water and therefore do not monitor for cyanide been discharges to surface and ground water down gradient. Water been used for the washing of potentially contaminated PPE sent for disposal at approved disposal service provider.

There are no surface water bodies near the warehouse which require monitoring.

4. TRAINING: *Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.*

Standard of Practice 4.1: *Train employees to operate the plant in a manner that minimizes the potential for cyanide exposures and releases.*

in full compliance with

The operation is in substantial compliance with Production Practice 4.1
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The facility trains their workers to understand the hazards of sodium cyanide. Training is provided to employees before they will be allowed to perform any work with sodium cyanide. Annual refresher training presented for all the employees. The mandatory training programs for all employees working at the warehouse, are Cyanide awareness (annually), Mock drills held (annually), basic firefighting (theoretical and practical) (annually), cyanide emergency response and evacuation (annually), the wearing of Personal Protective Equipment and basic first aid training presented every 2 years. Tools box talks are conducted on a weekly basis with various relevant subjects. Evidence of this training media noted, Training in Personal Protective Equipment is also covered in the cyanide emergency response (ERP) training, ERP training presented and mock drills. Planned task observations are conducted to determine whether employees' level of understanding the training been presented.

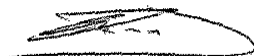
The required type of PPE's that is to be worn by employees is prescribed in the product SDS and Issue Based Risk Assessment. These includes correct use of full-face respirator with canister, PVC gloves, disposal tyvek overalls, safety boots and helmets. PPE training is covered in tools box meetings. Training presented captured on training matrix.

The training programs are organized and presented by professional external consultants e.g. forklift driving and the other in house training modules are handled by HSE Manager.

Attendance register required to be completed. The training models are all captured in the company's training matrix and the records are updated after each training program. A planned task observation is also used to ascertain employee's competency.

Training in Personal Protective Equipment is also covered in the cyanide emergency response training and mock drills. The required type of PPE's that is to be worn by employees is prescribed in the product SDS as well as those indicated in the various Issue Based Risk Assessments. These include correct use of respirator with canister, PVC gloves, disposal tyvek overalls, safety boots and helmets. PPE training is covered in tools box meetings. Employees are trained when new type of PPE is issued to workers.

Employees been trained, assessed and certified competent prior to commencing work at the warehouse. Workers are trained in each of their specific task that they perform to prevent risks of exposure to cyanide



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releases and injuries. The tasks include loading and offloading of sodium cyanide IBC's, safe operation of forklift inside warehouse (stacking of IBC's. The procedure addresses the safe practices in loading and offloading IBC's into or from sea freight containers to prevent unwanted risk of exposure to any employee due to possible cyanide gas been released or product exposure. Prior to loading or offloading of cyanide full IBC's or empty cyanide boxes and other packaging, each worker needs to be dressed-up in their prescribed PPE to perform this task.

At this warehouse facility no production activities are performed.

Tasks performed at this warehouse is the off-loading of cyanide packaging from shipping containers, stacking of packaged IBCs inside the warehouse as well as from warehouse into freight containers. Training elements found to be relevant to the current tasks performed by the warehouse staff.

Training is provided by appropriately qualified personnel e.g., basic first aid (Ghana Red Cross & St John's ambulance services), fire-fighting (the Ghana Fire Department) other training (registered external consultant and in house employee). HSE Manager can be regarded as qualified in the light of his qualifications, experience and background knowledge.

To assess the competency of each employee after training has been presented, it is required from participants to answer a written evaluation assessment on each course. Illiterate employees are subjected to a verbal questioning on the subject been presented.

Mock drill is held. The purpose of mock drills at the facility is to simulate an incident and to test, observe and evaluate the effectiveness of cyanide training. Planned work observations are also performed with each employee to determine whether task is performed in accordance to the work procedure and in safe sequence.

Standard of Practice 4.2: Train employees to respond to cyanide exposures and releases.

in full compliance with

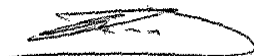
The operation is in substantial compliance with Production Practice 4.2
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The facility does present training to their employees and emergency response personnel to manage cyanide in a safe and environmentally protective manner and to ensure that they understand the hazards of cyanide not only to themselves, but also the environment and other people. Training been presented to warehouse employees how to respond to cyanide exposures and releases in a safe manner. Training requirements and actions on exposure to HCN gas and sodium cyanide dust is covered during the presentation of cyanide awareness. Procedure for handling an employee who has been overcome by HCN gas is covered under scenario "D" of the Emergency Response Plan and Evacuation Procedures.

Training in Emergency Response and mock drills are held annually for all employees. The training module for newly appointed employees includes Plant induction, cyanide awareness, Emergency Response Plan basic fire-fighting, basic first aid and the correct use of PPE. Once this training has been presented new employees can then start working. The facility has a training matrix that stipulates the training requirements.

Training presented captured on attendance register. Attendance register covering the trainer's name, courses presented, date training was presented, names and signatures of attendees. Presenter required to sign attendance register. Theoretical competency test done after each of the presented topics as well as employee's performance on written test results. Training records on subjects presented are retained for a minimum period of 10 years.



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5. EMERGENCY RESPONSE: *Protect communities and the environment through the development of emergency response strategies and capabilities.*

Standard of Practice 5.1: *Prepare detailed emergency response plans for potential cyanide releases.*

in full compliance with

The operation is in substantial compliance with Production Practice 5.1

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified

An Emergency Response Plan and Evacuation procedure No.MLL-WH-HSE-OPS-SOP-004 dated 21st October 2022 have been developed for the warehouse that details the actions to address potential releases of cyanide that may occur on site and that may require various other response actions. At the time of the audit, only cyanide in briquette form stored inside the warehouse. No damaged IBC's or redundant packaging noticed been kept inside the warehouse.

The possibility that hydrogen cyanide gas will be generated at this facility is very slim, as product do not get in contact with moisture. The facility does not carry out any dissolution activities and does not have any tanks, valves, pipes, pumps and waste treatment facilities. The facilities have procedures in handling cyanide exposed persons and spills of dry cyanide. No potentially ~~of~~ affected communities in and around the immediate vicinity of the facility as the warehouse is about 3 km from the nearest human settlement.

The warehouse facility has an 8 KVA standby electric generator which is used to generate power in case the national electricity supply grid goes down. In case of a power outage, the generator gets switched on manually by the security personnel as they are 24/7 on duty at the premises.

The ER Plan and Evacuation procedures details the emergency response for the most likely emergency situations that could occur, being a fire, injury, spillage of solid cyanide, gas release, severe weather and natural disasters, earthquakes, civil disorder, and explosion.

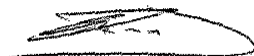
The designated position of the emergency assembly point noted and properly identified and conspicuously and position clearly displayed.

The facility does have procedures in handling cyanide exposed persons and spills of dry cyanide.

Movis Logistics have an arrangement with the Empat-Caiquo hospital Management stating that they are willing to administer the recommended cyanide antidote. Registered medical doctor on duty will administer the antidote intravenously. The recommended antidote used is Hydroxocobalamin. Administration of the antidotes will solely be administered by a medical doctor or a trained paramedic. The victim is transported using an ambulance or a company vehicle [with the cyanide antidote](#).

The Company do have an ER Plan compiled that details the emergency first aid measures that are to be followed in the event of emergency situations and in particular cyanide exposure cases. Specific first aid procedures and the administering of the cyanide antidote been detailed.

Hydroxycobalamine being the Company's preferred antidote for cyanide poisoning. As per the ERP, medical oxygen is administered at a prescribed flow rate of 12 to 15 l/min as set on the regulator to a cyanide exposed person and then transported to hospital while still on oxygen.



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Three warehouse staff members, Mr. Paul Akuettea, Okutu Emanuel and Robert Kaaka working in the cyanide warehouse were interviewed to determine their knowledge on the contents of the ER Plan. Auditor was satisfied that all three of them was well acquainted with the contents of this plan.

Standard of Practice 5.2: *Involve site personnel and stakeholders in the planning process.*

in full compliance with

The operation is in substantial compliance with Production Practice 5.2

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The facility has involved its workforce and stakeholders in the emergency response planning process. Company Management have not been directly involved with the engagement of communities. The Ghanaian Environmental Protection Agency (EPA) is tasked with the consultation of the community on the issue of cyanide warehousing. Other local response agencies such as Ghana Police, Ghana Fire Service, Ghana Ambulance Service, the elected community leader of the communities have been notified and is involved in the ER planning process.

The following external responders have been notified about their roles and responsibilities during emergency and the responders have acknowledged the roles they need to play in an emergency involving cyanide. Clause 3.1.4 (External Responders) of the Emergency Response Plan MLL-WH-HSE-OPS-SOP-0004 dated 21 st October 2022, specifies the roles and responsibilities of external responders.

Letters notifying the external responders of their roles and responsibilities should it be required of them during cyanide incidents. The stakeholders accepted in writing to assist during cyanide incidents at the warehouse. The external responders are;

- ❖ the Ghana Police service,
- ❖ Ghana Fire Service,
- ❖ Disaster Management (NADMO).
- ❖ Ghana EPA
- ❖ Mine site
- ❖ Medical Providers namely Empat-Caiquo hospital.

Movis Logistics organizes annual Emergency Response training and mock drills. External responders invited are Ghana Police, Ghana Fire Service and Ghana Ambulance Service.

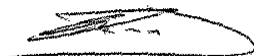
Standard of Practice 5.3: *Designate appropriate personnel and commit necessary equipment and resources for emergency response.*

in full compliance with

The operation is in substantial compliance with Production Practice 5.3

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:



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The Company's HSE Manager is the formal appointed primary emergency response coordinator. Appointee is responsible for initiation of alerts and to commit whatever resources are necessary to manage the required functions. Duties and responsibilities are clearly defined in the appointment. The HSE Manager may call on participating organizations or responders as per the specific ER Plan.

The following Movis personnel constitute the ER team of the warehouse:

- ❖ The MLL HSE Manager.
- ❖ The warehouse safety officer
- ❖ The warehouse supervisor
- ❖ 2 Forklift operators
- ❖ Security personnel

The above-mentioned personnel have been trained in cyanide awareness, basic first aid and how to handle cyanide exposed person.

Interviews conducted on each of the above members proved that their knowledge about cyanide and handling of cyanide incidents. The ERP identifies the emergency response teams.

The external emergency responders stipulated in the ERP are:

- ❖ Ghana police,
- ❖ Ghana EPA,
- ❖ Ghana Ambulance services,
- ❖ Ghana Fire Services,
- ❖ Water resources Commission,
- ❖ NADMO and
- ❖ mine sites.

Appropriate training for emergency responders is stipulated in the Emergency Response Plan and Evacuation procedure (MLL-HSE-OPS-SOP-005 dated 28/6/22) for the Warehouse employees. Required training also included in training matrix. The Company organizes annual refresher Emergency Response training. Mock drills held together with the external responders. The training comprises annual cyanide emergency response scenario training.

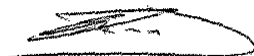
Appropriate training for emergency responders is stipulated in the Emergency Response Plan and as per training matrix (reference training requirement)

The facility has a call-out procedures. This procedure is covered in the ER Plan which: -

- ❖ details the call-out procedures,
- ❖ the emergency contact list,
- ❖ the roles and responsibilities of the ER Response teams,
- ❖ the list of emergency response equipment, and
- ❖ inspection procedures.

MLL has a list of all emergency response equipment and a product SDS ~~to be~~ is available for use in responding to cyanide incidents. List of emergency equipment specified in ERP. The Emergency Response Plan and Evacuation procedure for the Warehouse details the required emergency equipment that must be made available. Equipment is checked monthly by the HSE Manager to ensure availability and operability.

Emergency response equipment are stored in a dry and clean storage area and as per manufacturer's guidelines. This includes the cyanide antidote. Medical oxygen bottles and content checked by external company. Emergency Response Equipment are checked and tested weekly and replaced when damaged or expiry date have reached. Emergency safety shower and eye wash facilities checked monthly to ensure functionality. Findings recorded on appropriate checklists. Fire extinguishers are checked monthly and serviced annually by external service provider. All checklists found to be up to date and complete.



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Standard of Practice 5.4: *Develop procedures for internal and external emergency notification and reporting.*

in full compliance with

The operation is in substantial compliance with Production Practice 5.4
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Clause 8.0 (Internal and External Notification) of the Emergency response plan outlines the notification procedures to be followed and who to be contacted in the case of an emergency. The emergency coordinator for the Company is the HSE Manager who will notify the Company's Managing Director (MD) of such incident.

The MD will notify the mining companies, the relevant authorities including the following:

- ❖ the local Police,
- ❖ the local Fire Service,
- ❖ the local Ambulance Service,
- ❖ the Environmental Protection Agencies (the local community authorities)
- ❖ the Water Resources Commission and
- ❖ ICMI.

The list of emergency telephone contact numbers for the external responders, (Ambulance Service, Police and Ghana Fire Service) available at the warehouse, the Security Office, and the reception in the Administrative Building. Revising of telephone contact list is done annually or as when there is a change in the contact persons and phone numbers of the external ER responders.

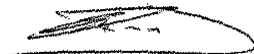
Notification of the community is the responsibility of the Ghana EPA in conjunction with MLL in case of an incident. Clause 1.0 of the Sodium cyanide management plan states that EPA is responsible for notify all affected communities in case of a major incident.

ER procedure details the responsibility of addressing the media and who to notify the consignor (Manufacturer) and ICMI.

The Manufacturer and the International Cyanide Management Institute (ICMI) will be notified in case of a significant cyanide incident. Clause 7.2.5 of the ERP states that the ICMI be notified in the event of the following: -

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

The Emergency Response Plan does not specifically address contact with media however from interviews held with HSE Manager and other senior members, it was clear that the Managing Director is the only authorised person allowed to address the media and release media statements.



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Standard of Practice 5.5: *Incorporate into response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.*

in full compliance with

The operation is in substantial compliance with Production Practice 5.5
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Emergency Response Plan PART D: "CLEAN UP AND CONTAINMENT OF SODIUM CYANIDE SPILLAGES" describes specific, appropriate remediation measures, such as recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and / or disposal of spill clean-up debris.

The plan addresses the following: -

- Recovery of sodium cyanide solid material
- Neutralization and/or disposal of excavated soil
- Appropriate use of Ferrous sulphate in neutralization
- Recovery and treatment of surface/ground water

Contaminated soils are neutralized using Ferrous sulphate under strict supervision and neutralized material sent to the mine site for disposal.

Also, remediation measures, such as the recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media, management and/or disposal of spill clean-up debris addressed in clauses 3.6.4 and 7.1.5 of the ER Plan. Potable water is available throughout the facility. The local municipality supply drinking water to the facility.

The ER Plan stipulates that under no circumstances **should** sodium hypochlorite, ferrous sulphate and hydrogen peroxide be used as neutralizing agent for cyanide that has been released into surface water.

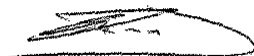
Standard of Practice 5.6: *Periodically evaluate response procedures and capabilities and revise them as needed.*

in full compliance with

The operation is in substantial compliance with Production Practice 5.6
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The Emergency Response Plan states that "All documentation will be reviewed and updated based on the outcome of the quarterly emergency mock drill or when significant or critical changes have been observed or reported. The company will review the ER Plan based on the lessons learnt or recommendations made from the outcome of an incident investigation. Working documents and forms reviewed periodically as and when required. MOC procedures followed when reviewing procedures and / or the ER Plan.



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The Company procedures require that the ER Plan be revised and evaluated at least on an annual basis or when significant or critical changes have been observed or reported. The Emergency Response Plan and Evacuation procedures were revised on 2nd January 2023. Revision 9.

Company procedures require that mock drills be held at least on an annual basis. Emergency mock drills are to ascertain the preparedness of the Company's site personnel, drivers, escort leaders, security officers and external service providers to respond to a cyanide related emergency and to evaluate their competency as well as the effectiveness of the requirements as stipulated in the ER plan. Based on the non-conformances and observation done during the annual mock drills, the ERP is reviewed according

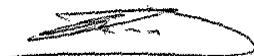
The HSE **Manager** and his team is responsible for reviewing and updating the plan annually to ensure that the business and technology changes are aligned with the plan.

The facility had no emergency involving cyanide since the last audit to date.

The facility's procedures require that refresher training in cyanide awareness and mock drills are held on an annual basis. The annual training and mock drill have been followed consistently and records filed. Mock drill reports are issued for every mock drill that is conducted. External emergency responders such as Ghana Fire Service, Ghana Police and Ghana Ambulance Service participate in the annual mock drills.

Emergency mock drills and lesson learned from incidents are used for the evaluating and revising of the ER plan. Corrective action plans are put in place based on non-conformances noted during the drills. Recommended corrective actions are issued, considered and incorporated into the ER Plan.

End of report.



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