

**INTERNATIONAL CYANIDE MANAGEMENT  
INSTITUTE**

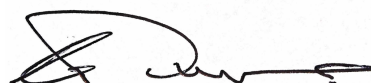
**Summary Production  
Recertification Audit Report  
Repackaging Plant #2**

**Vehrad Transport & Haulage  
Tema, Ghana**

**31 May 2024**

**For The  
International Cyanide Management Code**

Vehrad Transport & Haulage  
Repackaging Plant #2



Signature Lead Auditor

31 August 2024

Name of Operation: Vehrad Transport & Haulage Repacking Plant #2  
Name of Operation Owner: Vehrad Transport & Haulage  
Name of Operation Operator: Vehrad Transport & Haulage  
Name of Responsible Manager: Mr Nazih Hussein,  
General Manager  
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**Location detail and description of operation:**

The repackaging plant (Plant #2) is operated by Vehrad Transport and Haulage (Vehrad) and is located at Plot #A/46/30, Heavy Industrial Area, Tema, Ghana, a Vehrad subsidiary site within 5 kms of the main Vehrad site. The repackaging plant consists of a repackaging facility supported by a single warehouse and two cyanide packaging incinerators.

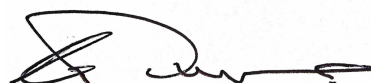
Vehrad collects and delivers loaded shipping containers to the main Vehrad site or to this site, where they are de-stuffed with boxes containing cyanide briquettes. These boxes are stored in a cyanide warehouse and awaiting repackaging into sparge Isotanks for onward transport to mine sites. Each consignor's or mine cyanide boxes are stored separately in the warehouse, and the sparge ISO tanks are filled in client-specific batches.

The repackaging plant consists of a screw convey and hopper facility supported by a warehouse. In this warehouse, the boxed and bagged cyanide briquettes are stored before being repacked into Isotanks and road transported by Vehrad Transport and Haulage trucks to mine sites in West Africa.

All waste cyanide packaging (wooden boxes, plastics and polypropylene bags) is taken directly to the incinerator facility situated at this same site.

Currently, repackaging operations are split between Repackaging Plant #1 and Repackaging Plant #2, approximately 80% to 20%, respectively.

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***Auditor's Finding***

*This operation is*

***X in full compliance***

*in substantial compliance \*(see below)*

*not in compliance*

*with the International Cyanide Management Code.*

This operation is in full compliance with the requirements of the International Cyanide Management Institute (ICMI) Cyanide transportation re-certification audit requirements. This operation has not experienced compliance problems during the previous three-year audit cycle.

Audit Company: Transheq Consulting and Auditing (Pty) Ltd

Lead Auditor and Production Auditor: Richard Durrant

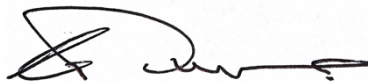
E-mail: [richard@transheq.co.za](mailto:richard@transheq.co.za)

I attest that I meet the International Cyanide Management Institute's criteria for knowledge, experience, and conflict of interest for Code Verification Audit Team Leader and that all members of the audit team meet the applicable criteria for Code Verification Auditors.

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

Date of audit: 31 May 2024

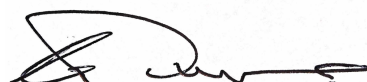
Richard Durrant  
Name



Signature

31 August 2024  
Date

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

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

**X** 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:*

Vehrad operates a cyanide repackaging facility (Repackaging Plant #1) next to its cyanide storage facility at its main site in the Heavy Industrial Area, Tema, Accra, Ghana. A second repackaging and incineration facility (Repackaging Plant #2 - Screw) is located offsite approximately 5 kms away at address plot No. IND/A/46/38 of Kpone Industrial Area. Currently repackaging operations are split between Repackaging Plant #1 and Repackaging Plant #2.

In previous certification audits, the following documents were reported: - Mabani Steel Design Calculations, Rev: 0, dated 13 Nov 2012, for Cyanide Debagging with Vacuum System (GH-1649) The Design Calculations Package was prepared using the latest applicable American Design codes, the (2002) edition of MBMA (Metal Building Manufacturers Association) and the latest developments in engineering practices.

A competent design engineer prepared the calculations and another competent engineer checked his work. Sighted general specifications notes from Mabani Steel for: Design, Foundations and Embedments, materials, fabrication – Index Sheet, Job No GH-1649, Nov 2012.

Also reviewed in a previous audit was the design pack which included a bulk bag reprocessing conceptual flow diagram; a warehouse process flow diagram; a unit process diagram; a bulk bag reprocessing process flow diagram; a fork lift transport of bulk bags schematic; the Isotainer transport process flow diagram; and the incinerator process flow diagram. The on-site warehouse was modified to accommodate cyanide storage by the installation of ventilation fans, the sealing of floors, and the installation of a ramp, linked to the bunding and containment requirements. No changes to the design or operation have taken place since the last audit.

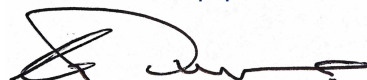
A previous certification audit reported on drawing of completed Cyanide Debagging System, dated 25/3/2014, signed off by QC Engineer, Ahmed Rashwany, and QC Manager, Hassan Assani of United Fabrication Ltd, Tema, Ghana. Sighted Final Inspection report dated 25-3-2014 signed by A Rashwany and H Assani of United Fabrication Ltd and Engineer Amer Mikati of United Fabrication Limited (Ghana Registration No C1206, and Registered Eng#6431, Member, Chartered Institute of Engineers).

Previous certification audit reported that the Repackaging facility was constructed from Mild Steel. (confirmed during current site inspection) The Design Engineer was aware, as per drawing annotations, that facilities being used for solid sodium cyanide briquette repackaging. Previous certification audit confirmed Mabani Steel Design calculations, Rev; 0, dated 13 Nov 2012. For Cyanide Debagging with Vacuum System (GH-1649) includes detailed material specifications for the various steel components of the construction. Engineer Amer Mikati of United Fabrication Limited (Ghana Registration No C1206, and Registered Eng#6431, Member, Chartered Institute of Engineers) has reviewed the drawings and structure and confirmed the “as-built” status of both incinerators and structure and materials of construction are “fit-for-purpose” for incinerating cyanide packaging.

No design or operation changes have occurred since the last audit.

There is a standby generator on site. The equipment has three emergency stop buttons: two at ground level and one on top of the gantry. If power fails, the equipment will automatically shut down.

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The plant is located on an impervious concrete base inside a building to minimise seepage to the subsurface.

Isotanks are batch-based with briquettes. 18 boxes pre-prepared for a 20-ton sparge Isotank.

There is no liquid cyanide or any form of liquid in the process.

Spills within the containment area will be cleaned up according to the Decontamination Procedure.

Repackaging: The facility has a high roof, which protects boxes from the weather. No boxes are stored in the repackaging facility; they are drawn from the adjacent warehouse for each repackaging process.

Repackaging will not take place under rainy conditions.

Storage Warehouse: Procedures are in place to keep water out of the warehouse, and a Procedure for Cyanide Warehouse Management is in place. The warehouse roof, gutters, and interior and exterior walls were inspected and found to be all in order. A cross drain is located at the entrance to the building to prevent the entry and exit of liquids.

Confirmed site inspections and sighted Warehouse Monthly Inspection.

Repackaging Facility: No cyanide is currently stored in the repackaging facility. The building has two extractor fans installed for ventilation and air circulation. Sighted fans operating during site inspection

Warehouse: The repackaging facility is a walled area within the main site. A security guard controls access. No person is permitted in the facility without authorisation, appropriate training, and appropriate PPE. The area is locked up when repackaging operations are not taking place.

Warehouse and Repackaging Screw: Always locked and monitored by the security guard.

Motion detector beams and CCTV cameras are in place throughout the yard and inside the warehouse and repackaging facility. CCTV monitoring can be done remotely from mobile phones.

Only cyanide is stored in this warehouse. No other materials are stored in the same warehouse.

*Production Practice 1.2: Develop and implement plans and procedures to operate cyanide production facilities in a manner that prevents accidental releases.*

### **X 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:*

Operating procedures have been developed for the repackaging plant and storage warehouses. The procedures cover pre, post, and basic operation, cyanide repackaging plant and warehouse management, guidelines for vital components, inspections, equipment decontamination, buddy system, change management procedure, and process flow diagram.

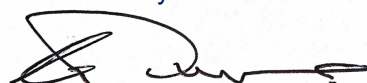
Procedures all include relevant pre-work inspections and appropriate PPE (Personal Protective Equipment).

Emergency Response Plan procedures considered include Incinerator Emergency Response Plan the release of HCN gas; Isolation Distances, Health Exposures Plant Incident – Cyanide Spill; Plant Incident-Cyanide Spill: Overfilling of Isotank: Bag not splitting for briquette discharge; Bag handle torn while lifting bag onto hopper; Bag handle torn while lifting bag out of hopper; bag partially split; spill from vehicle in the repackaging plant; explosion/fire in the repackaging plant; roof collapse with and without rain; unplanned power outage and other abnormal and emergency situations, etc. There are a total of 15 different scenarios covered in the procedure.

A Management of Change procedure is in place, and any changes must be approved by the HSSE Manager and General Manager. Procedure for New Modification & Change Management Exercise, is used to consider any changed cyanide risk. Change or modification related to cyanide operations must be approved by a cyanide specialist or HSSE Manager.

The Repackaging Facility and Storage Warehouse have a Planned Maintenance Schedule in place for inspections, maintenance of equipment and history of maintenance of equipment. Ongoing planned

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maintenance is in place for inspections prior to all operations, maintenance of equipment and history of equipment maintenance. Inspecting floors for cracks and walls and the roof for cracks/leaks is included. Under normal operating conditions, the process is a dry process. However, washings from the repackaging area will be flushed into the effluent gutter, leading to the containment sump. If necessary, the sump will be neutralised with ferrous sulphate. The sumps are emptied periodically by a professional waste disposal company.

All solid cyanide spillages will be contained, packaged, and sent to the mines. Contaminated packaging will be destroyed in Vehrad's own incinerators. . Procedures state that cyanide waste packaging is incinerated at 1500 °C till all materials will turn to ash.

Cyanide transported in ISO sparge tanks meets materials design specifications for cyanide. Tank drawings and specifications are in place. The cyanide briquettes are received from the producer, packed in boxes in sea containers, or decanted into sparge tanks and sealed according to Maritime Dangerous Goods Code (IMDG) requirements. All Isotanks and sea containers conform to IMDG specifications, placarding and sealing requirements.

*Production Practice 1.3: Inspect cyanide production facilities to ensure their integrity and prevent accidental releases.*

**X 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:*

Storage Warehouses - Plant Inspection Procedure and Checklist have been developed and are in use. Repackaging facility inspections for the sparge Isotanks have been developed. No pipes or valves are involved in the process. Inspection routines are in place for the hopper and related bag and box handling facilities in the repackaging plant. Isotank Pre-Load Inspection. Equipment is inspected before each load.

Annual Hydrostatic Tests conducted on Isotanks by Industrial Engineering Consultants Ltd an independent approved inspection authority.

Isotainers are inspected prior to loading and prior to despatch to check integrity and security of hatches and valves.

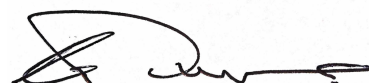
Drain inspections are conducted before every operation.

In the auditor's option, the inspection frequencies are sufficient as the repacking facility is not in continual use, and the storage warehouse is only accessed when cyanide boxes are being moved into or out of the warehouse. Therefore, the frequency of inspections would ensure that equipment is functioning within design parameters.

Inspection documentation identifies all items to be observed, the date of the inspection, the inspector's name, and any observed deficiencies.

Corrective actions are documented, and records are retained. Confirmed in records sampling and review.

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

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

**X 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:*

Operating procedures have been developed for the repackaging plant and storage warehouses. These include consideration of PPE, a Hot Spot Survey, pre-work and post-operation checks, heat stress, normal and abnormal conditions, a buddy system, a Training Plan, pre-, post-, and basic operations, normal, abnormal, and emergency conditions, and a manual of authority.

Operating procedures cover stuffing, de-stuffing, repackaging and storage only, as these are the only on-site activities.

Repackaging Screw & Incinerator Emergency Response Plan covers non-routine (abnormal) and emergency scenarios and their responses

All routine, non-routine and emergency scenarios and their responses are covered by procedures and work instructions. Decontamination Procedure states that any contaminated equipment must be decontaminated prior to maintenance. The procedure describes the decontamination process which includes Personal Protective Equipment requirements and uses 1:1 diluted Ferrous Sulfate and water sprayed onto equipment or plant while continually monitoring for HCN gas

Procedures cover consulting with the workforce through Job Safety Observations (JSO) risk assessment, change management, and health and safety meetings.

Hot Spot Surveying for HCN gas and particulates using ICMI limits during repackaging operations has recordable levels within the approved limits. The site has 14 x portable personal HCN gas monitors: - 10 x Watchgas UNI MP 100 HCN 0-100 PPM and 4 x ToxiRAE 11 HCN PGM-1170

Monitors are calibrated to measure 4.7 ppm at the first alarm and 9.7 ppm at the second alarm. The first alarm prompts an investigation of the cause, and the second alarm prompts an evacuation. All monitors are submitted to one company for calibration. The monitor register matrix includes all monitors and expiration dates, calibration certificates and calibration information. Monitors are recalibrated on a staggered basis to ensure that always calibrated monitors are available. The monitor calibrations are conducted at annual intervals in accordance with the original equipment manufacturers requirements.

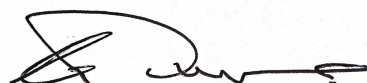
A Buddy System is used and includes a task procedure and abnormal conditions. This includes the functions of the buddy, the required PPE, and what to do in the case of an emergency. The use is also made of an "Ambulance/First Aider" observer who inspects the PPE, donning and doffing, decontaminates, does hot spot surveys, etc.

Driver Health Management is in place to ensure healthy drivers. Drivers and Safety Officers forklift operators and reach stacker operator staff are given medical examination and screening annually.

Full-cover PPE (full suit, gloves, rubber boots, full face mask, and canister) is always used during repackaging. There is no need for a clothing change policy as clothes do not come into contact with cyanide. There is no sub-contracting of jobs in areas where cyanide is located. Visitors are not permitted to access the cyanide warehouse.

Signage is in place. PPE requirements, warning signs and appropriate prohibitions. Signs are prominently displayed at all facilities' entrances, including no smoking or open flames and no eating and drinking other than in designated areas.

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

**X 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:*

The Facility has its own Emergency Response Plan to respond to cyanide exposures. The Repackaging-Hoist Emergency Response Plan. The Plan includes sections on Sodium Cyanide, Roles and Responsibilities, Emergency Equipment, and 15 x Screw Emergency scenarios.

Custom-built safety showers supplying potable water and pre-dissolved ferrous sulphate are outside the Repackaging plant and Warehouse. Potable water supplies eye wash at the same location. Nozzles have lower-pressure water and caps to prevent them from being dirtied. An eye wash bottle is also located in the first aid kit.

Fire extinguishers are strategically located in the yard and building (repackaging area and warehouse). They are maintained annually, and monthly inspections are recorded. Extinguishers are included in a register. They are all dry powder, non-acidic type.

Oxygen is available outside the warehouse and repackaging facility in the site office via an "oxygen concentrator" (Perfecto2 Invacare) and an Oxy-Viva oxygen bottle. Emergency communication is via a man-down alarm and cell phones. The antidote is stored in the air-conditioned site office for transport with the patient, and it is also supplied to Lagoon Clinic, a private medical facility.

Cyanide first aid equipment is inspected monthly. Cyanide antidote is stored according to the manufacturer's specifications. The HSSE Department manages the schedule for replacing the antidote. There is a Monthly First Aid Inspection Checklist in place, and First Aid / Cyanokits are inspected prior to the commencement of any repackaging operations.

English is the working language of the site. SDSs are included in Emergency Response Plans and procedures. SDSs are also located on the labels of the cyanide boxes. Sighted SDSs for all types of sodium cyanide on site.

The Decontamination Procedure details the Plant and Equipment and the Decontamination Procedure. Visitors and contractors are not permitted in the area during repackaging.

Eleven Safety Officers are all trained first aiders. If repackaging is undertaken, an "ambulance" staff member (as identified in the procedure) is always a trained first aider.

First aiders are trained by the Ghana Red Cross, and recent training registers and certificates are in place. Safety Officers each have an HSSE Training Passport detailing all HSSE training, including first aid. Ghana First Aid is competent in cyanide first aid and has conducted this training since 2017. Emergency Response Plan indicates that in the event of a cyanide exposure safety officers apply the first aid, Ghana Red Cross evacuate contaminated persons to the hospital while giving oxygen, and hospital will administer the cyanide antidote

The Incident and Accident Investigation Procedure covering the warehouse and repackaging facilities is in place. The procedures describe the process of investigation of any incident that may occur. The procedure covers both cyanide and non-cyanide related incidents.

No incidents have occurred at the repackaging or warehouse facilities in the recent past.



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

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

**X 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:*

No water that is used in the facility escapes from the site. No direct discharge to groundwater. All discharge goes to an effluent containment sump, which is emptied whenever the compartment is 50% full, by a specialist waste company.

Water and soil sampling and analysis are done approximately every six months by an external test laboratory. Testing of water and soils shows results are at or below the limits of detection, and no seepage has ever required remedial activity. Recent test results indicate (WAD - Weak Acid Dissociable) WAD < 0.001 mg/l, free cyanide = 0.001mg/l and total cyanide= 0.001 mg/l. There is no upstream or downstream mixing zones.

No groundwater has beneficial uses by the jurisdiction. However, the plant is located on an impervious concrete base that can overflow to a collector channel which ultimately leads to the main site interceptor sump. The principle is, however, to keep any spillages within the repackaging plant bund area.

No seepage has ever required remedial activity.

The repackaging facility has extraction fans with filtration equipment. The hopper is also designed with flexible rubber flaps to keep any dust within the hopper and facility.

Monitoring is undertaken during repackaging plant operations. Portable gas and particulate monitor is available to check levels under normal, abnormal, and emergency conditions. Background and baseline monitoring has been undertaken during the plant's current commissioning operations.

Hot Spot Surveys are conducted while plant operations are taking place.


HCN monitoring is conducted on site on a daily basis. The facility is located within an industrial area.

Air Emissions testing for SO<sub>2</sub>, NO<sub>x</sub>, Carbon dioxide, Flue gases, and HCN is conducted on monthly basis and reported to the Environmental Protection Agency The results must comply with Ghana Standard Health Protection GS 1236:2019.

Surface water discharges are also monitored, and samples are taken and analysis reports are made from an independent laboratory. Decontamination process is conducted after every plant operation. Decontaminated material is directed to the sump. HCN monitoring is conducted prior to every plant operation.

In my professional opinion the frequencies of monitoring are adequate for the nature of the operations and the levels of detection recorded.

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

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

**X 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:*

Workers at the Repacking Plant # 2 facility and warehouse have been trained in cyanide awareness, hazards, and emergency response. Up-to-date training "passport" records are available for all Safety and all other employees involved with cyanide. Periodic refresher training is carried out. The training includes: Cyanide History & Uses, Physical & Chemical Properties, Cyanide Packaging, Manufacture of Cyanide, Neutralization of Cyanide, Effects & Symptoms of Cyanide, Protection from Cyanide, Cyanide spill - What to do? and First Aid. PPE training is included in Cyanide Awareness Training. These are the same worker crews that operate at Plant # 1 as the two operations would not be in operation at the same time.

Training is conducted on all Safe Operating Procedures and tasks relating to cyanide.. All training is conducted by the HSSE Manager.

No person is permitted to work in the repackaging plant until appropriately trained. Training passports in place as evidence of training.

A training matrix is used to manage training requirements and programmes. Formal training, on-the-job procedure training, and Planned Task Observations (PTOs) are all used. A procedure is in place that explains the type of training to be conducted and the required frequency of the training.

Training is conducted by experienced and qualified training personnel.

*Production Practice 4.2: Train employees to respond to cyanide exposures and releases.*

**X in full compliance with**

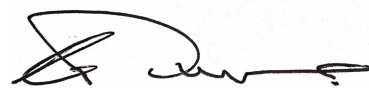
**The operation is**       in substantial compliance with      **Production Practice 4.2**  
 not in compliance with  
 not subject to

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

All operators at #1 and # 2 Repackaging Plant and the warehouse received training on the Emergency Response Plan, including cyanide releases and worker exposures. Training Passports showing ER training were sighted.

Emergency Response Training was provided to 41 Vehrad employees and 9 Ghana Fire Service officers. Training on procedures, including Evacuation and Isolation training, Chemical Awareness and Chemical Segregation and Standard Fire Aid covering stress management, Immediate first aid training in the event of cyanide contamination, and CPR.

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Cyanide Awareness Training has been conducted extensively over the last three years, with topics and registers in place. In 2023, awareness training from Orica Limited was provided for 163 Vehrad employees. Vehrad training is conducted on all Safe Operating Procedures relating to cyanide.

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

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

**X 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:*

Repackaging Screw Emergency Response. The Plan includes fifteen scenarios that may require a response.

The scenarios considered in the Plan include roof collapse and the impact of rain on stored cyanide; fire outbreak in the repacking plant during operation; robbery/Civil Disturbance; Overloaded Isotank; bag handle torn while lifting bag with briquette spill; and unplanned power outage during repacking operation.

The Emergency Evacuation Map and Repackaging Emergency Response Plan include specific response actions, as appropriate for the anticipated emergency situations, including an isolation radius around the plant.

The procedure for medical treatment for cyanide exposure includes the use of the Antidote, advice to the Doctor, and First Aid Treatment.

Control of releases at their source is addressed in normal and abnormal operating procedures for the Repackaging Plant.

The Plan includes assessment, mitigation and investigation to prevent future releases. Emergency Plan process Flow is described in the Emergency Response Plan.

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

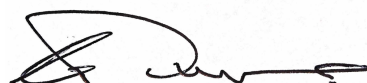
**X in full compliance with**

**The operation is**  in substantial compliance with **Production Practice 5.2**  
 not in compliance with

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

Tema Heavy Industrial Area has created a Safety Task Force called the Tema Industrial Area Task Force. The objective of the Task Force is to take a proactive approach to preventing unforeseen events due to fire and property damage. This includes educating stakeholders, peer-to-peer review audits, sharing industrial ideas and best practices, and supporting each other in an emergency, e.g., fire, spill, etc.

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Through continuous liaison, the site engages with key stakeholders such as the Ghana EPA, Police, navy, National Security, Ghana Red Cross, and Fire Service.

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

**X 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:*

Repackaging Emergency Plan- Human Resources (HR) informs medical services, police and other government departments. Base Controller is the General Manager or Operations Manager, Incident Controller is the HSSE Department. This is all dependent on the nature of the incident.

The Emergency Response Plan (ERP) details the Emergency Control Centre and Emergency Control Team designations. It also includes a 24-hour Emergency Contact List.

All repackaging and warehouse operators are trained as emergency response team members and their training is included in the Training Matrix and the Training Plan.

In 2023, 49 people, including Vehrad staff and Ghana Fire and Police Service officers, received emergency response training.

The Repackaging Plant Emergency Response Plan describe the roles and responsibilities of members of the emergency control centre, emergency control team and external emergency responders

The Emergency Response Plan details the Emergency Equipment—Plant Emergency Response Equipment, an Emergency Van (4x4 vehicle), and a Pumper Tanker Truck. The procedure with emergency tools and equipment checklists lists the emergency equipment for each of the above.

The site engages with key stakeholders such as the Ghana EPA, Police, Navy, National Security, Ghana Red Cross, and Fire Service through continuous liaison. However, these key stakeholders do not regularly participate in mock drills due to a lack of resources.

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

**X in full compliance with**

**The operation is**  in substantial compliance with **Production Practice 5.4**

not in compliance with

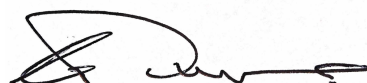
*Summarize the basis for this Finding/Deficiencies Identified:*

Emergency Response Plan - Roles and Responsibilities are detailed in the plan and this includes notifying management, regulatory agencies, and potentially affected communities of an incident and/or response measures and communication with the media

Vehrad has a written procedure for notifying ICMI of any significant cyanide incidents, as detailed in the Emergency Response Plan—Roles and Responsibilities.

No significant cyanide incidents have occurred on the site that required reporting.

Vehrad Transport & Haulage  
Repackaging Plant #2



Signature Lead Auditor

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

**X 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:*

The Repackaging Plant is fully concreted from front to back, with no exposed soil or environment. The only task required is to clean up dry spills.

Treatment chemicals are stored in an emergency equipment trailer on-site when repacking occurs.

Recovery or neutralization of solutions or solids is detailed in the Emergency Response Plan - Clause Neutralization, which decontaminates soils or other contaminated media.

Waste-neutralized cyanide solutions must not be allowed to be discharged directly into sewers, drains or water courses. Therefore, it is collected in the site interceptor. Samples will be taken, and analysis will be conducted by an independent test laboratory. This waste will be collected by a waste disposal company for final safe disposal.

There would be no need to provide alternative water supplies because all water is provided by a Municipal reticulated water supply. Potable water is provided from bottled water in all circumstances.

Neutralization or disposal of sodium cyanide spills using ferrous sulphate and sodium/calcium hypochlorite is permitted unless there is a possibility for these chemicals enter standing water or streams and may affect aquatic life. In these circumstances, the neutralization agents may not be used unless there is a direct threat to human life.

Emergency Response Plan details the Treatment and Neutralization of Sodium Cyanide Spills and explains the monitoring and treatment of any potential spill to the land surface and water.

As the facility is fully concreted and drains to a containment sump the risk of environmental contaminations is seen as low.

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

**X 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 Plan is revised annually or when necessary after mock drills, activations of the Emergency Response Plan, changes or alterations of any routine operation, or legislative changes.

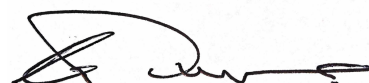
The last Emergency Plan revision was conducted in March 2024

Mock Emergency - Mock drill carried out in March 2024.

Sighted drill in 2023 - Cyanide poisoning during spillage recovery- testing the first aid response, communication, roles and responsibilities and spill recovery. Evaluation was done with future recommendations noted.

Emergency Plan states that mock or tabletop exercises are to be conducted at least once per year.

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Evaluation is included in the Mock Emergency documentation process. The mock drill carried out in January 2024 included an evaluation and lessons observed from the exercise, including an Immediate Action Plan and additional Buddy personnel to be available during repackaging operations.

End of Report

