



July 2015

## INTERNATIONAL CYANIDE MANAGEMENT CODE

# Movis Ghana Limited Transportation Certification Audit, Ghana, Summary Audit Report

**Submitted to:**

International Cyanide Management Institute  
1400 I Street, NW - Suite 550  
Washington, DC 20005  
UNITED STATES OF AMERICA

Movis Ghana Limited  
Meridian Tower First Floor  
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TEMA, GHANA

REPORT



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### APPENDICES

#### APPENDIX A

Limitations



## 1.0 INTRODUCTION

### 1.1 Operational Information

**Name of Transportation Facility:** Movis Ghana Limited  
**Name of Facility Owner:** Movis Ghana Limited  
**Name of Facility Operator:** Movis Ghana Limited  
**Name of Responsible Manager:** Hubert Asamoah, Managing Director  
**Address:** Movis Ghana Limited  
1<sup>st</sup> Floor, Meridian Towers,  
Off Meridian Road, Community 1, Tema, Ghana.  
PO Box BT 160,  
Tema Community 2, Tema, Ghana  
**State/Province:** Tema  
**Country:** Ghana  
**Telephone:** +233 202 111 016  
**Fax:** +233 303 212 626  
**Email:** hubert.asamoah@movis-ghana.com

### 1.2 Movis Ghana Limited

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

Movis transports cyanide that is imported to Ghana through the Port of Tema and the Port of Takoradi. Movis currently transports cyanide between Ghana and Samira Mining in Niger.

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

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

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

Movis Ghana Limited  
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Signature of Lead Auditor

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### 1.4 Auditors Findings and Attestation

in full compliance with  
**Movis Ghana Ltd is:**  in substantial compliance with **Cyanide Management Code**  
 not in compliance with

**Audit Company:** Golder Associates Pty Ltd  
**Audit Team Leader:** Edward Clerk, CEnvP (112), Exemplar Global (020778)  
**Email:** eclerk@golder.com.au

### 1.5 Name and Signatures of Other Auditors:

Name	Position	Signature	Date
Edward Clerk	Lead Auditor and Transport Technical Specialist		22 July 2015

### 1.6 Dates of Audit

The Certification Transport Audit of Movis Ghana Ltd was undertaken over two days on 24 and 25 March 2015.

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

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

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## 2.0 TRANSPORT SUMMARY

### 2.1 Principle 1 – Transport

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

#### 2.1.1 Transport Practice 1.1

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

in full compliance with

Movis Ghana Ltd is

in substantial compliance with

Transport Practice 1.1

not in compliance with

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

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

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

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

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

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

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

Movis liaises with the Civil Protection Agency in Burkina Faso which accompanies the convoys from the Burkina Faso border to Niger Border. The Civil Protection Agency involvement is mandated by Burkina Faso government.

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

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The ERP identifies responsibilities for the Police, Fire Service, Ambulance, Ghana Environmental Protection Authority (EPA), Water Resources Commission and the Mine Site as external responders. Movis has advised these external responders and medical facilities of their roles during an emergency response. Direct engagement of communities by Movis did not occur as the communities are not designated a role as part of the planned response to an emergency involving cyanide negating the need for community consultation on this issue.

Movis does not subcontract any of its cyanide transport operations within the scope of this audit.

**2.1.2 Transport Practice 1.2**

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

in full compliance with

**Movis Ghana Ltd is**

in substantial compliance with

**Transport Practice 1.2**

not in compliance with

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

Movis is in FULL COMPLIANCE with Transport Practice 1.2 requiring personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

Movis only uses trained and competent operators to drive its trucks. All drivers are checked to ensure they have the correct and valid licence before being employed and prior to each trip departure. Licences issued by Ghanaian regulatory authorities are recognised by ECOWAS countries. When travelling in Burkina Faso and Niger, an International Driver’s Licence is accepted and used by drivers. There is no requirement in Ghana, Burkina Faso and Niger for drivers to be licensed for dangerous goods transport.

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

- Defensive driving
- Basic fire fighting
- General cyanide awareness and familiarisation
- Emergency response scenario (mock drill) training

A review of the training matrix and records indicated that the training was being conducted.

Movis does not subcontract any of its cyanide transport operations within the scope of this audit..

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**2.1.3 Transport Practice 1.3**

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

**in full compliance with**

**Movis Ghana Ltd is**

in substantial compliance with

**Transport Practice 1.3**

not in compliance with

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

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

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

The Ghanaian EPA liaises with their ECOWAS counterparts and consequently Movis' EPA Permit is recognized by the ECOWAS countries through which it transports cyanide. The ECOWAS protocol also guarantees free movement within the sub-region, subject to customs and other regulations.

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

Movis has implemented a *Maintenance Procedure*. This procedure requires regular preventive maintenance services to be undertaken at or before the manufacture's recommended mileage intervals. Services are undertaken by a qualified mechanic in accordance with the *Preventative Maintenance Service Chart* and the *Preventative Maintenance Checklist*. The procedure also requires pre-departure checks to be undertaken before each voyage.

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

Movis does not subcontract any of its cyanide transport operations within the scope of this audit.

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**2.1.4 Transport Practice 1.4**

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

in full compliance with

**Movis Ghana Ltd is**

in substantial compliance with

**Transport Practice 1.4**

not in compliance with

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

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

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

Placards are used to identify the shipment as cyanide, as required by international standards. Movis’ TMP requires that the containers used to transport solid sodium cyanide are marked with the required placards in accordance with International Maritime Dangerous Goods Code. The TMP also states that Movis conforms to regulations and codes as applicable for the transportation of cyanide.

The Ghanaian EPA liaises with their ECOWAS counterparts and consequently Movis’ EPA Permit is recognized by the ECOWAS countries through which it transports cyanide. The ECOWAS protocol also guarantees free movement within the sub-region, subject to customs and other regulations.

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

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

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

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

- *A preventative maintenance program.*

Movis has implemented a *Maintenance Procedure*. This procedure requires preventive maintenance services to be undertaken at or before the manufacture’s recommended mileage intervals.

- *Limitations on operator or drivers’ hours.*

Movis’ CMP includes a Fatigue Management Policy that provides measures to control fatigue. Some of these include:

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

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■ *Procedures to prevent loads from shifting.*

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

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

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

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

■ *A drug abuse prevention program.*

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

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

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

Movis does not subcontract any of its cyanide transport operations within the scope of this audit.

**2.1.5 Transport Practice 1.5**

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

**in full compliance with**

**Movis Ghana Ltd is**

in substantial compliance with

**Transport Practice 1.5**

not in compliance with

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

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

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

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**2.1.6 Transport Practice 1.6**

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

in full compliance with

**Movis Ghana Ltd is**

in substantial compliance with

**Transport Practice 1.6**

not in compliance with

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

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

Movis' vehicles use cell phones, radios and satellite phones to communicate with the transport depot, the mining operation, the cyanide producer and emergency responders. While in convoy, trucks must maintain radio or cell phone communication. A satellite phone is used in areas of no or limited cell phone communication. Escort personnel must call the Logistics Officer in Tema at designated Call Points along the route and all calls are logged in the communication log sheet.

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

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

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

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

Movis does not subcontract any of its cyanide transport operations within the scope of this audit.

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## 2.2 Principle 2 – Interim Storage

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

### 2.2.1 Transport Practice 2.1

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

in full compliance with

**Movis Ghana Ltd is**

in substantial compliance with

**Transport Practice 2.1**

not in compliance with

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

Transport Practice 2.1 requiring transporters design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures is NOT APPLICABLE to Movis.

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

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## 2.3 Principle 3 – Emergency Response

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

### 2.3.1 Transport Practice 3.1

Prepare detailed Emergency Response Plans for potential cyanide releases.

in full compliance with

Movis Ghana Ltd is

in substantial compliance with

Transport Practice 3.1

not in compliance with

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

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

Movis has developed an ERP which is specific to the design of the vehicles and transportation routes used by Movis. Section 3 of the ERP contains a Specific Emergency Response Guide that details incident types and it includes scenarios for truck transportation. It considers both the physical and chemical form of cyanide along with the method of transport. The consideration of transport infrastructure has also been undertaken by Movis through Route Risk Assessments. Route Risk Assessments detail the condition of the road, traffic hazards, intersections and issues to be managed by the driver along the route. The *Route Risk Assessment Procedure* considers the design of the intended transport vehicles.

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

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

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

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

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

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**2.3.2 Transport Practice 3.2**

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

**in full compliance with**

**Movis Ghana Ltd is**

in substantial compliance with

**Transport Practice 3.2**

not in compliance with

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

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

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

- Defensive driving
- Basic fire fighting
- General cyanide awareness and familiarisation
- Emergency response scenario (mock drill) training

The emergency response training is detailed in section 3.1 of the TMP under Minimum Training and Road Transport Requirements. A brief course description for each of the required training is also provided.

A review of the *Training Matrix* indicated that all drivers had completed the mandatory training. The ERT Leader checks drivers have the required up to date training prior to departure. Refresher training is planned at a minimum on an annual basis and whenever the plan is reviewed or an incident occurs. Where there is change in the route used, refresher training on emergency response will be undertaken.

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

- ERT Leader
- Vehicle Driver
- Emergency Response Team
- External Responders.

Movis maintains a list of all of its emergency response equipment that should be available during the transport route. The quantity and condition of the equipment is checked as part of the *Emergency Equipment Checklist, Pre-Departure Checklist and Escort Vehicle Pre-Trip Checklist*. It is the ERT Leader's responsibility to ensure that all emergency equipment is checked and are up to manufactures specification prior to convoy departure.

Movis has emergency response and health and safety equipment, including personal protective equipment during transport. Movis has procedures to inspect emergency response equipment and assure its

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availability when required. The quantity and condition of the equipment is checked as part of the *Emergency Equipment Checklist, Pre-Departure Checklist and Escort Vehicle Pre-Trip Checklist*.

Movis does not subcontract any of its cyanide transport operations within the scope of this audit.

**2.3.3 Transport Practice 3.3**

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

in full compliance with

**Movis Ghana Ltd is**

in substantial compliance with

**Transport Practice 3.3**

not in compliance with

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

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

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

**2.3.4 Transport Practice 3.4**

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

in full compliance with

**Movis Ghana Ltd is**

in substantial compliance with

**Transport Practice 3.4**

not in compliance with

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

Movis is in FULL COMPLIANCE with Transport Practice 3.4 requiring that they develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

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

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

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

The ERP and TMP both state:

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

**2.3.5 Transport Practice 3.5**

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

in full compliance with

**Movis Ghana Ltd is**

in substantial compliance with

**Transport Practice 3.5**

not in compliance with

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

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

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

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

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

*Completed ERP will be issued to stakeholders for their comment.*

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

The ERP states that:

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

At the time of the Audit, the ERP was 6 months old and had been revised once.

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### **3.0 LIMITATIONS**

Your attention is drawn to the document – “Limitations”, which is included as Appendix A to this report. This document is intended to assist you in ensuring that your expectations of this report are realistic, and that you understand the inherent limitations of a report of this nature. If you are uncertain as to whether this report is appropriate for any particular purpose please discuss this issue with us.

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## Report Signature Page

**GOLDER ASSOCIATES PTY LTD**

A handwritten signature in black ink, appearing to read 'E. Clerk'.

Edward Clerk  
ICMC Lead Auditor and ICMC Transportation Expert

DCR/EWC/eh

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# **APPENDIX A**

## **Limitations**



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