



November 2014

INTERNATIONAL CYANIDE MANAGEMENT CODE

Satellite Trans 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

Satellite Trans
Plot N° 30F
Agro Industry, Aflao Road.
Community 25, Tema-Ghana
Postal Address
Private Mail Bag
Community 1 – Tema, Ghana

REPORT

Report Number. 147648023-003-R-Rev0

Distribution:

- 1 Copy - ICMI (+1 Electronic)
- 1 Copy - Satellite Trans (Electronic)
- 1 Copy - Golder Associates Pty Ltd (Electronic)





Table of Contents

1.0 INTRODUCTION.....	1
1.1 Operational Information	1
1.2 Satellite Trans Limited	1
1.3 Trans-shipping Depots or Interim Storage Sites	1
1.4 Auditors Findings and Attestation	2
1.5 Name and Signatures of Other Auditors:	2
1.6 Dates of Audit	2
2.0 CONSIGNOR SUMMARY.....	3
2.1 Principle 1 – Transport.....	3
2.1.1 Transport Practice 1.1	3
2.1.2 Transport Practice 1.2.....	4
2.1.3 Transport Practice 1.3.....	4
2.1.4 Transport Practice 1.4.....	5
2.1.5 Transport Practice 1.5.....	6
2.1.6 Transport Practice 1.6.....	6
2.2 Principle 2 – Interim Storage.....	8
2.2.1 Transport Practice 2.1	8
2.3 Principle 3 – Emergency Response.....	9
2.3.1 Transport Practice 3.1	9
2.3.2 Transport Practice 3.2.....	9
2.3.3 Transport Practice 3.3.....	11
2.3.4 Transport Practice 3.4.....	11
2.3.5 Transport Practice 3.5.....	12
3.0 LIMITATIONS	13

APPENDICES

APPENDIX A

Limitations



1.0 INTRODUCTION

1.1 Operational Information

Name of Transportation Facility: Satellite Trans Limited
Name of Facility Owner: Not Applicable
Name of Facility Operator: Satellite Trans Limited
Name of Responsible Manager: Eric Simpiney, HSE Manager
Address: Satellite Trans Limited
Plot N° 30F
Agro Industry, Aflao Road.
Community 25, Tema, Ghana
State/Province: Tema
Country: Ghana
Telephone: +233 (0) 244330392
Fax: Not Applicable
Email: eric.simpiney@satellitetransghana.com

1.2 Satellite Trans Limited

Satellite Trans is a Belgian transport company that established their first office in Ghana in 2002 to provide freight forwarding and logistics services. They have now been transporting hazardous materials and general goods for over 12 years serving Ghana, Burkina Faso, Niger, Mali, Guinea, Togo, Benin, Côte d'Ivoire and Liberia.

Satellite Trans transports cyanide that is imported to Ghana through the Port of Tema and the Port of Takoradi. Satellite Trans currently transports cyanide between Ghana and Burkina Faso.

Satellite Trans transports solid sodium cyanide as a >95% pure white briquette. The cyanide briquettes are packaged in Intermediate Bulk Containers (IBCs) of between 1000 to 1200 kg capacity. 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.

Satellite Trans Limited
Name of Facility



Signature of Lead Auditor

28 November 2014
Date



1.4 Auditors Findings and Attestation

in full compliance with
Satellite Trans 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		28 November 2014

1.6 Dates of Audit

The Certification Transport Audit of Satellite Trans was undertaken over one day on 8 August 2014.

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

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

Satellite Trans Limited
Name of Facility

Signature of Lead Auditor

28 November 2014
Date



2.0 CONSIGNOR 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

Satellite Trans is

in substantial compliance with

Transport Practice 1.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Satellite Trans 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 potential risks along the route. Hazards identified during the route assessment and selection process are risk assessed using the process detailed in the *Route Risk Assessment Procedure*. Following the conduct of any risk assessment, the procedure requires the *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.

Satellite Trans 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.

Satellite Trans 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 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.

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

Satellite Trans seeks input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures. Satellite Trans has identified suppliers, government ministries and departments, mine site customers and medical providers as stakeholders.

Satellite Trans utilise road convoys to address safety concerns during transport. Satellite Trans has a *Convoy Management Plan* (CMP) that details the requirements of transport in convoys. *Route Risk Assessments* list traveling in convoy with an escort is as a generic control to reduce risk for all convoys. In addition to convoys, Satellite Trans also utilise GPS tracking of their vehicles.

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. Satellite Trans has advised these external responders and medical facilities of their roles during an emergency response.

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

Satellite Trans Limited
Name of Facility


Signature of Lead Auditor

28 November 2014
Date



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
Satellite Trans is in substantial compliance with **Transport Practice 1.2**
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Satellite Trans 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.

Satellite Trans only uses trained and competent operators to drive its trucks. All drivers are checked to ensure they have the correct licence before being employed and prior to each trip departure.

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
- Mock drill training

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

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

2.1.3 Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

in full compliance with
Satellite Trans is in substantial compliance with **Transport Practice 1.3**
 not in compliance with

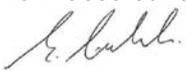
Summarise the basis for this Finding/Deficiencies Identified:

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

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

Satellite Trans has implemented a *Maintenance Procedure*. This procedure requires regular preventive maintenance services to be undertaken at or before the manufacturer's recommended mileage intervals. Services are undertaken by a qualified mechanic in accordance with the *Preventative Maintenance Service*

Satellite Trans Limited
Name of Facility


Signature of Lead Auditor

28 November 2014
Date



**SATELLITE TRANS LIMITED CERTIFICATION AUDIT
SUMMARY AUDIT REPORT**

Chart and the Preventative Maintenance Checklist. The Maintenance Procedure includes copies of the Fault Rectification Card, Preventative Maintenance Checklist, and the Maintenance Checklist. The procedure also requires all vehicles (prime movers and trailers) to be inspected using a Pre-departure Checklist before each voyage.

Satellite Trans has procedures in place to prevent overloading of vehicles. The Emergency Response Team 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.

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

2.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

in full compliance with

Satellite Trans is

in substantial compliance with

Transport Practice 1.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Satellite Trans 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 Satellite Trans to check container seal integrity and the trailer twist locks for damage. The TMP requires information including that containers are undamaged and seals are in place 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. Satellite Trans' TMP details the requirement 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 Satellite Trans conforms with all Ghana regulations and codes as applicable to the transportation of HAZMAT and general goods. The *Pre-departure Checklist* requires a check for 1689 and marine pollutant labelling on containers.

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

- A *Maintenance Procedure* that requires vehicles to be inspected with the *Pre-departure Checklist*. The Emergency Response Team Leader ensures trucks transporting the consignment have had the *Pre-departure Checklist* completed and are roadworthy.
- Satellite Trans 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*.
- Procedures to control driver fatigue that includes limits to worker hours, maximum driving times and required stopover points.

Satellite Trans Limited
Name of Facility


Signature of Lead Auditor

28 November 2014
Date



- Procedures to prevent loads from shifting, including the use of container twist locks designed and constructed to international transport standards, and container belts.
- Procedures to suspend operations for inclement weather or problems on the route.
- A *Zero Tolerance Drugs and Alcohol Policy* that details the organisation’s awareness programme and notes the circumstances that testing may be carried out.

Records are retained confirming the above activities have been conducted.

Satellite Trans 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

Satellite Trans 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 Satellite Trans.

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

2.1.6 Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

in full compliance with

Satellite Trans is in substantial compliance with **Transport Practice 1.6**
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Satellite Trans’s vehicles have means to communicate with the transport, the mining operation, the cyanide producer and emergency responders.

The CMP includes a communication procedure for convoys travelling between ports and mine sites including requirement for loaded trucks to inform the mine site via email or using a cell phone of their planned departure time. While in convoy, trucks must maintain radio or cell phone communication, with a satellite phone to be used in areas of communication blackout. Escort personnel must call the Logistics Officer in Tema at designated Call Points along the route. All calls are logged in the communication log sheet. All communications systems are to be checked prior to the convoy leaving as per the *Pre-departure Checklist* and *Escort Vehicle Pre-trip* checklists.

Satellite Trans Limited
Name of Facility

Signature of Lead Auditor

28 November 2014
Date



SATELLITE TRANS LIMITED CERTIFICATION AUDIT SUMMARY AUDIT REPORT

Emergency contact details for authorities, emergency responders and medical facilities are provided as appendices in the ERP. The procedure states that numbers are reviewed annually or when the route assessment is updated.

No communication black out zones have been identified on routes to current end user destinations. However, the HSE Manager stated that black spots are also checked for during the route survey process. The GPS tracking system continuously transmits position and other data from the convoy throughout the trip.

Communication equipment is tested to ensure it functions properly either periodically or through continuous means. The *Pre-departure Checklist* includes a check for mobile phone 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.

Satellite Trans has implemented systems and procedures to track the process of cyanide. The CMP requires Escort personnel to follow the Call Points along the route by calling the Logistics Officer in Tema for him to track their location and progress. The TMP requires Satellite Trans to inform the Supply Department at the mine site of convoy details including expected departure and arrival times. Satellite Trans also utilises a tracking system to determine the convoy location. The GPS tracking system continuously transmits position data and vehicle ID, local time, status (i.e. end drive, parked, drive), current location, course, speed and fuel consumption.

The driver's *Journey Plan* also details the departure and delivery points and rest points in between.

The TMP requires all trucks and escort vehicles to have laminated cards showing the Material Safety Data Sheets for sodium cyanide. The *Pre-departure Checklist* includes a check for the laminated Material Safety Data Sheets.

Satellite Trans 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 Satellite Trans for each container. The waybill (duplicate and original) accompanies the Driver during the delivery. The waybills include a description of the goods, including container and seal details. This system is used as proof of delivery to customer mines.

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

Satellite Trans Limited
Name of Facility


Signature of Lead Auditor

28 November 2014
Date



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

Satellite Trans 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 Satellite Trans.

Storage of sea containers containing cyanide is not planned as part of Satellite Trans' transport logistics.

Satellite Trans Limited
Name of Facility


Signature of Lead Auditor

28 November 2014
Date



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

Satellite Trans is

in substantial compliance with

Transport Practice 3.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Satellite Trans has developed *Sodium Cyanide Emergency Response Plan* (ERP). The ERP is specific to the design of the vehicles and transportation routes used by Satellite Trans. The *Specific Emergency Response Guide* Section 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 Satellite Trans 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, Satellite Trans Ltd, the Mine Site and external emergency services.

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

2.3.2 Transport Practice 3.2

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

in full compliance with

Satellite Trans is

in substantial compliance with

Transport Practice 3.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Satellite Trans Limited
Name of Facility


Signature of Lead Auditor

28 November 2014
Date



SATELLITE TRANS LIMITED CERTIFICATION AUDIT SUMMARY AUDIT REPORT

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

Satellite Trans provides emergency response training of appropriate personnel. Satellite Trans 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
- Mock drill training

A review of *Training Matrix* showed that all drivers had completed the mandatory training. The Emergency Response Team Leader checks drivers have the required up to date training prior to departure. The emergency response training is detailed in the TMP under *Minimum Training and Road Transport Requirements*.

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

- ERT Leader
- Vehicle Driver
- ER Team
- External Responders.

Satellite Trans 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* and *Escort Vehicle Pre-trip Checklist*. It is the Emergency Response Team Leader's responsibility to ensure that all emergency equipment is checked and are up to manufactures specification prior to convoy departure.

Satellite Trans provides initial and periodic refresher training in emergency response procedures including implementation of the ERP. The emergency response training is detailed in the TMP under *Minimum Training and Road Transport Requirements*. Refresher training will be organised at a minimum on an annual bases 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.

Satellite Trans 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* and *Escort Vehicle Pre-trip Checklist*.

Records are retained showing that checks of emergency equipment are being undertaken prior to convoy departure.

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

Satellite Trans Limited
Name of Facility


Signature of Lead Auditor

28 November 2014
Date



2.3.3 Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

in full compliance with

Satellite Trans is

in substantial compliance with

Transport Practice 3.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Satellite Trans 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

Satellite Trans is

in substantial compliance with

Transport Practice 3.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Satellite Trans 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.

Satellite Trans 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.

Satellite Trans Limited
Name of Facility


Signature of Lead Auditor

28 November 2014
Date



Satellite Trans 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

Satellite Trans is

in substantial compliance with

Transport Practice 3.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Satellite Trans 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 Satellite Trans 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 Satellite Trans Ltd.

Completed ERP will be issued to stakeholders for their comment.

Satellite Trans has provisions for periodically conducting mock emergency drills.

The ERP states that:

...the ERP will be reviewed when necessary based on findings from yearly mock drills conducted by Satellite Trans Ltd.

The CMP details mandatory training requirements for drivers and escort personnel which includes Cyanide Awareness and Mock Drill training.

Evidence was provided in the form of drill reports that mock drill exercises are being undertaken by Satellite Trans.

Satellite Trans Limited
Name of Facility



Signature of Lead Auditor

28 November 2014
Date



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.

Satellite Trans Limited
Name of Facility



Signature of Lead Auditor

28 November 2014
Date



Report Signature Page

GOLDER ASSOCIATES PTY LTD

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

Edward Clerk
Associate, ICMC Lead Auditor and ICMC Transportation Expert

BJL/EWC/vb

A.B.N. 64 006 107 857

Golder, Golder Associates and the GA globe design are trademarks of Golder Associates Corporation.

\\pth1-s-file01\jobs\env\2014 - environment\147648023 - satellite trans-icmi transport audit-ghana\correspondence out\147648023-003-r-rev0 sar satellite trans.docx



APPENDIX A

Limitations



LIMITATIONS

This Document has been provided by Golder Associates Pty Ltd ("Golder") subject to the following limitations:

This Document has been prepared for the particular purpose outlined in Golder's proposal and no responsibility is accepted for the use of this Document, in whole or in part, in other contexts or for any other purpose.

The scope and the period of Golder's Services are as described in Golder's proposal, and are subject to restrictions and limitations. Golder did not perform a complete assessment of all possible conditions or circumstances that may exist at the site referenced in the Document. If a service is not expressly indicated, do not assume it has been provided. If a matter is not addressed, do not assume that any determination has been made by Golder in regards to it.

Conditions may exist which were undetectable given the limited nature of the enquiry Golder was retained to undertake with respect to the site. Variations in conditions may occur between investigatory locations, and there may be special conditions pertaining to the site which have not been revealed by the investigation and which have not therefore been taken into account in the Document. Accordingly, additional studies and actions may be required.

In addition, it is recognised that the passage of time affects the information and assessment provided in this Document. Golder's opinions are based upon information that existed at the time of the production of the Document. It is understood that the Services provided allowed Golder to form no more than an opinion of the actual conditions of the site at the time the site was visited and cannot be used to assess the effect of any subsequent changes in the quality of the site, or its surroundings, or any laws or regulations.

Any assessments made in this Document are based on the conditions indicated from published sources and the investigation described. No warranty is included, either express or implied, that the actual conditions will conform exactly to the assessments contained in this Document.

Where data supplied by the client or other external sources, including previous site investigation data, have been used, it has been assumed that the information is correct unless otherwise stated. No responsibility is accepted by Golder for incomplete or inaccurate data supplied by others.

Golder may have retained subconsultants affiliated with Golder to provide Services for the benefit of Golder. To the maximum extent allowed by law, the Client acknowledges and agrees it will not have any direct legal recourse to, and waives any claim, demand, or cause of action against, Golder's affiliated companies, and their employees, officers and directors.

This Document is provided for sole use by the Client and is confidential to it and its professional advisers. No responsibility whatsoever for the contents of this Document will be accepted to any person other than the Client. Any use which a third party makes of this Document, or any reliance on or decisions to be made based on it, is the responsibility of such third parties. Golder accepts no responsibility for damages, if any, suffered by any third party as a result of decisions made or actions based on this Document.

At Golder Associates we strive to be the most respected global company providing consulting, design, and construction services in earth, environment, and related areas of energy. Employee owned since our formation in 1960, our focus, unique culture and operating environment offer opportunities and the freedom to excel, which attracts the leading specialists in our fields. Golder professionals take the time to build an understanding of client needs and of the specific environments in which they operate. We continue to expand our technical capabilities and have experienced steady growth with employees who operate from offices located throughout Africa, Asia, Australasia, Europe, North America, and South America.

Africa	+ 27 11 254 4800
Asia	+ 86 21 6258 5522
Australasia	+ 61 3 8862 3500
Europe	+ 356 21 42 30 20
North America	+ 1 800 275 3281
South America	+ 55 21 3095 9500

solutions@golder.com
www.golder.com

Golder Associates Pty Ltd
Level 3, 1 Havelock Street
West Perth, Western Australia 6005
Australia
T: +61 8 9213 7600

