



PALADIN ENERGY LTD

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**Paladin Energy's Ltd Response to the questions from
The International Consortium of
Investigative Journalists (ICIJ) in relation to the
Langer Heinrich Mine, Namibia**

8 July 2015

LANGER HEINRICH URANIUM RESPONSE TO QUESTIONS PUT BY ICIJ

- 1. In the (Inter-Ministerial Committee) report, it was noted that there is a lack of safety culture at the mine due to the workers limited amount of knowledge at the mine on how to keep themselves safe and other regulations and procedures. What was done in this regard?**

LHU RESPONSE

The Inter-Ministerial Committee's Report of July 2013 on the investigation of grievances of the Mine Workers Union concerning the health, safety and labour practices at the Langer Heinrich Uranium Mine (LHU) states in Section 4.2.1 in relation to Radiation Exposure that there is a *"lack of safety culture and this is particularly evident in that the workers are not aware of the policies, roles and procedures as outline(d) in the radiation management plan."*

In Section 4.4.1, on the subject of general safety on the Mine, the Report notes that the Ministry of Mines and Energy's Mines Safety and Services Division has visited the LHU Mine on an annual basis since the Mine started production. It further noted that *"without prejudice, most of the safety-related incidents reported to the Ministry ... could be attributed to mere uncarefullness (sic.) of the individual employees, although one cannot explicitly rule out the possibility of poor supervision and effective safety awareness campaigns by the regulatory authorities (MoL, MoHSS, MME, including Trade Unions)."*

It is evident from the above-mentioned comment that the alleged *"lack of safety culture"* cited in the Report related mainly to policies, roles and procedures concerning radiation management, while the section on general safety makes it clear that safety should be the concern of all involved – individual employees, their immediate supervisors, the Company, trades unions and indeed the regulatory authorities. LHU endorses that view. The Company's philosophy is that that every single person in our workplace is responsible for ensuring their own safety and the safety of those around them and that we should collectively strive to maintain and improve our safety record.

LHU maintains a Manager-led Safety, Health, Security and Radiation Protection Division, which has 19 employees dedicated to maintaining health and safety standards in the Operation. Since publication of the Report, the great majority of the LHU workforce has undergone safety re-induction and been provided with role-related safety training.

Paladin's safety and health performance of its operations is measured through the external internationally recognized National Occupational Safety Association (NOSA) Five Star System ensuring transparency and complementing its own internal audit processes. LHU's most recent NOSA grading audit conducted in March 2015 resulted in the operation regaining its 4 Star Platinum (health, safety and environment) grade rating.

- 2. It was recommended that pregnancy test be made compulsory so that the working conditions of female employees can be adapted to them in that regard. Is this being done? If so what is the process in place?**

LHU RESPONSE

LHU has implemented voluntary onsite pregnancy testing at the LHU first aid centre, but has not made this mandatory, as this would be an infringement of the rights of female employees. Employees have been notified of the availability of voluntary pregnancy testing by an occupational nurse, while new employees are informed about its availability during their workplace safety induction. If a female employee's pregnancy is reported, a risk assessment is conducted and, if deemed necessary, the employee is transferred into another role to minimize any radiation exposure, which in any event is considered of minimal risk to the mother or her child. In addition, employees undergo periodic medical examinations to ensure that they are not exposed to undue occupational hazards.

- 3. The company has a Safety, Health, Environment and Radiation Protection policy (SHER), but there is no radiation management staff in place. Has somebody been appointed since? If yes when and how?**

LHU RESPONSE

As previously noted, LHU maintains a Manager-led Safety, Health, Security and Radiation Protection Department, which has 19 employees dedicated to maintaining health and safety standards in the Operation. This includes five radiation management section officers. The Paladin Energy Group's Senior Radiation Specialist is now permanently assigned to LHU and is based in Namibia to oversee the LHU site radiation management system.

LHU has submitted a revised Radiation Management Plan (**RMP**) to the Namibian National Radiation Protection Authority (**NRPA**). The RMP has been approved by the NRPA and LHU is now implementing the provisions of this plan.

- 4. It was noted that there were no regular meetings, has this been changed? If so how and when are the meetings held?**

LHU RESPONSE

In light of the Report's recommendations, LHU's new employee induction program has been expanded to provide more comprehensive training on safety aspects and, in particular, on the policies, roles and procedures of the Radiation Management Plan. Daily pre-shift safety talks are conducted across the mine site and monthly departmental safety meetings take place.

Departmental shop floor safety representatives have been elected and trained and can discuss any safety, health or radiation concerns with line managers and/or the senior management safety committee. Review of safety procedures and employee safety training is part of the ongoing safety culture of LHU. For example, employee fire training is provided by the local fire brigade. Selected employees are also receiving training in accident/incident investigation methodology.

- 5. It was found during the investigation that the company has been lagging behind in terms of releasing annual reports to the relevant authorities. The 2011 annual report was submitted in 2013 and the 2012 radiation exposure results were provided in 2013. What has been done to rectify this?**

LHU RESPONSE

The Report (Section 4.1.2) recommended that the SHER Department should be staffed with personnel with the relevant experience and qualifications on Occupational Health and Safety and Radiation Safety Protection. Recruitment of suitably qualified and experienced staff in Namibia has been a challenge – a fact recognized by the Uranium Institute of Namibia, which is in the process of introducing a specialized post-graduate course at the Polytechnic of Namibia. Nevertheless, the Department is now fully staffed with appropriately qualified personnel. A comprehensive radiation monitoring program has been operating for some time to determine radiation characteristics around the mine site. This monitoring program also generates data for the Annual Radiation Report, enabling LHU to meet its reporting obligations in a timely manner.

6. **Did the company submit its annual reports as recommended since 2013? If yes, can we have copies of these reports?**

LHU RESPONSE

The 2014 Annual Radiation Report was submitted to the NRPA by the due date of 30 March 2015. Annual radiation dose assessments were distributed to relevant LHU employees in April 2015. Results of LHU's 2014 monitoring program as reported demonstrate that the mean radiation dose to employees was 3.1 milliSieverts (**mSv**). This is well within the occupational exposure limits recommended by the International Commission for Radiological Protection (**ICRP**) and set by the NRPA, which provides that the occupational exposure should not exceed:

- An effective dose of 20 mSv, averaged over a period of five consecutive calendar years, or
- An effective dose of 50 mSv in any single year.

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