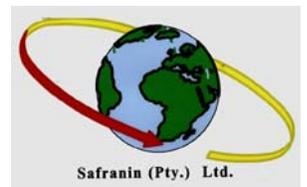


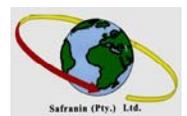
LAKE ASSAL SALT HEALTH & SAFETY AUDIT SEPTEMBER 2008

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1. TERMS OF REFERENCE

This Health and Safety audit at Lake Assal Salt was conducted by Mr. J Grobler of Safranin (Pty) Ltd on Monday 8th September to Wednesday 10th September on the instruction of Mr. D. Sutton the Chief Executive Officer of Salt Investment S.A at Lake Assal Salt, Djibouti 2008.

2. EXECUTIVE SUMMARY.

Lake Assal Salt is approximately 100 kilometers from Djibouti it is 155 m below sea level and covers an area of approximately 54 km² of crystallized salt which in turn can be up to 60 m thick. The second section of the Lake Assal consists of brine and is also approximately 54 km² in area and 40 m thick. The proposed project is to expand the current raw salt production to approximately 6 million tons per year which will then provide employment for 200 plus employees.

The aim of any Health and Safety audit is to determine the hazards and risks associated with the reclaiming and refining of the product (Salt). There is different legislation or practices that can be used as a guide line for the audit. Since legislation pertaining to health and safety is not of a high standard within Djibouti the report writer used the International Finance Corporation's guideline "Environmental, Health and Safety (EHS) Guidelines" as a base for this audit.

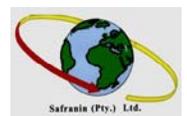
The Environmental section was conducted by Dr Harris of "Geographic Environmental Solutions" June 2008.

Health and Safety audits are there to identify short falls within a programme and to improve, mitigate and ultimately eliminate possible hazards that can cause severe disabilities or even death.

3. INTRODUCTION.

The purpose of a health and safety programme as recommended is to protect the wellbeing off all employees as they contribute to the development of an organisation and themselves. Injuries or even fatal incidents will have a devastating affect on management, employee and members of the public. The programme is there to ensure all employees, visitors and contractors are made aware of the different hazard and risks within the environment and to ensure there are procedures in place for conducting work in a safe manner.

If the programme is implemented effectively the accident rate can be kept low and early identification of potential environmental and health hazards can be identified and corrective action taken immediately.



3.1 Abbreviations.

IFC - International Finance Corporation
PPE - Personal Protective Equipment
OHSAS - Occupational Health and Safety Assessment Series

3.2 There are different sections within the health and safety implementation programme that management must look at

Section 1	Contractors Pre construction phase	Training	H&S policies & procedures	
Section 2	Contractors Construction phase	Training	H&S procedures	Inspections
Section 3	Operational phase	Training	H&S procedures H&S Implementation phases	Inspections
Section 4	Maintenance phase	Training	H&S procedures Audits	Inspections

3.3 Description of Activities on Site.

There are three sectors within this project namely:

- Lake Assal Salt
- Ghoubbet Harbour
- Accommodation Complex

LAKE ASSAL SALT.

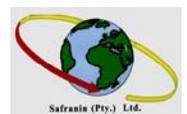
No construction work is being conducted on site as yet, but is planned for early in January 2009. Preparations have been made to bring the equipment from Djibouti to the lake by truck.

The proposed plan is to erect a large washing facility on the salt bank and a storage area for the salt will be created just behind the unit. Trucks will be loaded while on the lake surface and will off load the salt into a washing and conveyor system that will built large heaps of salt. The salt will then be loaded onto trucks to be transported to the harbour via a road specially built for the purpose.

GHOUBBET HARBOUR

There is a lot of work to be conducted in this area as a jetty has to be constructed and a conveyor belt installed to load the salt onto the ships.

At this point in time very little construction is taking place at Ghoubbet harbour. An area has been cleared to accommodate the conveyor system which will transport the salt from the storage area to the ships.



HOUSING ACCOMMODATION

There are several houses on the site that were refurbished by Salt Investment and a large maintenance workshop that is in the process of being upgraded. A large diesel tank is to be installed to supply diesel fuel to the generators on site. The generator for this section is not on site as yet but will be housed in separate fenced in area.

4. LEGISLATION.

There is no legislation in Djibouti on Health and Safety and the prevention of accidents and injuries to employees. Therefore it was opted to use the International Finance Corporation (IFCO Health and Safety Guidelines the Occupational Health and Safety Assessment Series (OHSAS 18001) as well as best practices in South Africa and America.

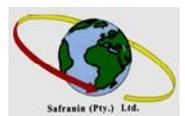
5. HEALTH AND SAFETY AUDIT FINDINGS

5.1 KHAT – CATHA EDULIS

Khat is widely used within Djibouti and due to the fact that it is a drug, although legal in the country, the use of the khat can result in serious injuries to employees and / or other persons within the immediate area.

During the discussion with Mr. Sutton it was clear that Khat will not be allowed on any of the sites of Salt Investment. Unfortunately there is no control of employees when they go off duty and they can obtain the Khat from people across the road from the accommodation site. There is already small shacks being built and with the proposed construction phase it is envisaged that the informal settlement will have a influx of people and dealers in Khat.

Khat contains a number of chemicals among which are two controlled substances, cathinone (Schedule I) and cathine (Schedule IV). As the leaves mature or dry, cathinone is converted to cathine which significantly reduces its stimulatory properties. Cathinone is approximately 10 more times more potent than cathine and is only present in fresh leaves.

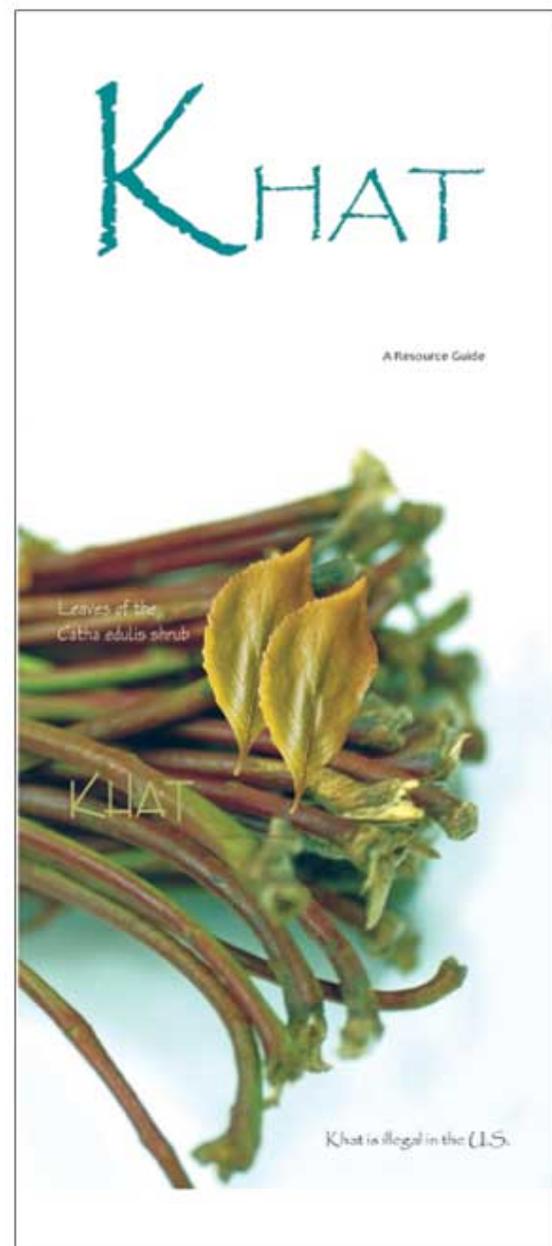


The effects are similar to but less intense than those of methamphetamine or cocaine. Fresh leaves are chewed and dried leaves are smoked, made into a paste and chewed, or brewed in tea. Used moderately, khat alleviates fatigue and reduces appetite. Long term use or abuse can cause insomnia, anorexia, gastric disorders, depression, liver damage and cardiac complications. Manic behavior, delusional behavior, violence, suicidal depression, hallucinations, paranoia and khat-induced psychosis have also been reported.

Taken in excess khat causes extreme thirst, hyperactivity, insomnia, and loss of appetite (which can lead to anorexia). Frequent khat use often leads to decreased productivity because the drug tends to reduce the user's motivation. Repeated use can cause manic behavior with grandiose delusions, paranoia, and hallucinations. The drug also can cause damage to the nervous, respiratory, circulatory, and digestive systems

SIDE EFFECTS (OVERDOSE SYMPTOMS)

- Grandiose delusions.
- Insomnia (loss of sleep (alertness)).
- Anorexia (loss of appetite) and loss of weight.
- Breathing difficulties.
- Increase blood pressure.
- Increase heart rate.
- Stomach irritation.
- Constipation which may precipitate hernias.
- Khat plant may be treated chemically which may affect the liver (chemical hepatitis).
- It interferes with absorption of iron and other minerals if taken internally.
- Opponents claim that Khat damages health by suppression of appetite and prevention of sleep.
- When its effects wear off, generates mild lapses of depression similar to those observed among cocaine users.



5.2 HEALTH HAZARDS FROM HEAT ON THE SALT FLATS.

There are different hazards that can be responsible for injuries to employees and heat is probably the biggest hazard causing heat stroke and heat exhaustion.

The sun's rays aren't the only hazard while working in hot weather. Heat stress is another. Hot weather stresses the body's cooling system. When high temperatures are combined with other stresses, like hard physical labour, loss of fluids or fatigue it can lead to heat-related illness, disability or even death.

Heat-related illnesses include:

- Heat cramps – Sweating drains the body of salt, resulting in painful cramps in the arms, legs or stomach.
- Heat exhaustion – Inadequate water and salt intake causes the body's cooling system to break down, producing heavy sweating, cool moist skin, high body temperature (over 38 degrees C), weak pulse and low blood pressure.
- Heat stroke – When the body has used up all its water and salt, sweating stops. Temperature rises quickly (to above 41 degrees C), and symptoms include weakness, confusion, distress, hot, dry, red skin, rapid pulse, headache or dizziness and, in later stages, convulsions or unconsciousness.
- Fatigue, exhaustion, muscle pain (from bending over/standing up when gathering salt in hot weather)
- Severe dizziness, particularly in hot weather.
- Cracked skin and hands and feet from handling salt and walking on it barefoot.
- Blisters from walking on salt flats.

(See Photo "A")



5.3 TRANSPORT OF SALT TO GHOUBBET HARBOUR.

Salt Investment has constructed a new road to enhance transport of the salt as on the main road the risks of accident, damage to the gearbox and engine problems would have been very high. These problems will be caused mainly by the steep up hills and sharp corners.

The new road is smooth but due to the heavy volume of traffic damage to the road will be high the sand will become powdery causing dust.

The following is recommended to minimise accidents on the road.

- The lights on the vehicles must be very strong and if possible additional light units to be installed on the roof to ensure a clear view of the road ahead.
- Due to the lack of street lights it is advised that large rocks are placed along the edge of the road that are painted in a very bright illuminant paint to highlight the edge.
- The sand on the roads will be pulverized to a very fine dust which can cause problems for the vehicles, possible contamination to salt and mainly the employees who can inhale the dust.



- **The five water bridges are also to be highlighted with bright illuminant paint.**
(See Photo "C" & "C1")



5.4 HAZARDOUS CHEMICAL SUBSTANCES.

Diesel will be stored on different sites to ensure the generators are kept running as these will supply the electrical current to the plant and all other facilities that require electricity.

It is determined that a large bulk tank will be situated in an old fuel station outside the accommodation area.

Diesel will then be decanted and transported to the different areas to refill the generators as and when required.

The following hazards are part and parcel of the diesel storage and use.

- **Fire from the diesel.** Although the flash point of diesel is very high it will be both difficult to prevent and/or extinguish a bulk tank fire. Flash point of diesel is 38°C (100°F)
- **Spillage during the decanting process.**
- **Possible static electrical build up during the decanting process and it is therefore advisable to implement an earth system during decanting. A safe operating procedure to be drawn up and implemented.**
- **All tanks to be bunded to contain any spillages. The bund wall should take 110% of the containers volume.**

■ The following signs to be displayed at each diesel storage area.

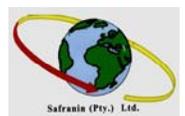


5.5 Hazard identification and Risk Assessments

PROBABILITY X FREQUENCY X SEVERITY = RISK RATING

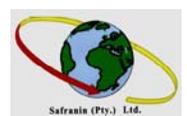
Probability Index	Descriptive Phrase	Severity Index	Descriptive Phrase
10	Inevitable	10	Death / Severe building damage \$ 1 Billion
9	Almost Certain	9	Permanent Total Incapacity / Major property damage > \$ 5 million
8	Very Likely	8	Permanent Severe Incapacity / Some building damage > \$ 1 million
7	Probable	7	Permanent slight incapacity ≤ \$ 1 Million
6	More Than Even Change	6	Absent from work for more than 3 weeks. > \$ 500 000.00
5	Even Change	5	Absent from work for more than 3 weeks but with subsequent complete recovery / Property damage < \$ 400 000.00
4	Less Than Even Change	4	From work for more than 3 days but less than 3 weeks with a subsequent complete recovery > \$ 100 000.00
3	Improbable	3	Absent from work for less than 3 days with complete recovery / Property damage > \$ 50 000.00
2	Very Improbable	2	Minor injury with no loss time and complete recovery. Property damage < \$ 1 000.00
1	Almost Impossible	1	No human injury expected. > \$ 500.00

Frequency Index	Descriptive Phrase	Priority of Action Scale			
10	Hazard permanently present	800 - 1000	Immediate action		
9	Hazard arises every 30 seconds	600 - 800	Action within 7 days		
8	Hazard arises every minute	400 - 600	Action within a month		
7	Hazard arises every 30 minutes	200 - 400	Action within next year		
6	Hazard arises every hour	Below 200	No immediate action necessary, but review.		
5	Hazard arises every shift	Intolerable	Significant	Slight	Low
4	Hazard arises every once a week				
3	Hazard arises every once a month				
2	Hazard arises every year				
1	Hazard arises every 5 years				

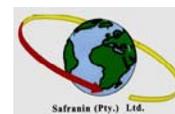


The following hazards and associated risks were noted and analysed during the audit process.

Hazard	Risk associated with the hazard	Probability	Frequency	Severity		Risk Rating	Recommendation	
1	Work Environment Temperature (Natural)	Dehydration of employees	9	10	4	360	SLIGHT RISK	Employees to be supplied with water 24 hours a day First Aider's to identify early signs of dehydration
2		Heat stroke	9	10	4	360	SLIGHT RISK	Employees to be supplied with water 24 hours a day First Aider's to identify early signs of dehydration
3		Dehydration of employees (During Ramadan)	10	10	4	400	SIGNIFICANT RISK	No employee to work during the afternoon shift. Employees to go to their respective sleeping quarters
4		Heat stroke (During Ramadan)	10	10	4	400	SIGNIFICANT RISK	No employee to work during the afternoon shift Employees to go to their respective sleeping quarters
5	KHAT QAT	Aggressive Behaviour (Employee making use of the drug)	10	10	2	200	MEDIUM RISK	KHAT Policy to be introduced and applicable signs displayed.
6		Light headed 9 Lack of Co-ordination) (Employee making use of the drug)	10	10	2	200	MEDIUM RISK	KHAT Policy to be introduced and applicable signs displayed.
7		Injuries to the employee using the KHAT	10	10	6	600	HIGH RISK	KHAT Policy to be introduced and applicable signs displayed. Build up a data base on employees caught with KHAT or who has used KHAT on site



8		Injuries to other employees due to the influence of KHAT on the employee	9	10	6	540	SIGNIFICANT RISK	Employees to be identified early with signs and symptoms of being under the influence of the drug. Training of employees on the dangers of KHAT
9	Operating Heavy Equipment on a Dirt Road	Loose control of the heavy duty vehicle	9	10	6	540	SIGNIFICANT RISK	A speed limit to be introduced and monitored via a techo graph system or the proposed satellite monitoring
10		Bumping into or falling to a lower level should the truck go over the cliff	9	10	8	720	HIGH RISK	Training and monitoring is essential to prevent accidents. Develop an accident investigation programme and identify the causes.
11		Inhalation of dust during the transport of the salt on the dirt road	5	10	3	150	LOW RISK	The trucks to be maintained and ventilation measured. If necessary employees to be issued with dust masks. ANSI Approved
12		Noise induced hearing loss from the noise of the engine into the driving compartment	5	10	3	150	LOW RISK	Obtain the noise levels from the truck manufacturer and measure the noise while in operation
13		Vibration due to the engine vibration into the Compartment	5	10	3	150	LOW RISK	Vibration to be monitored and should employees complain of kidney or lower back problems the use of kidney belts are then recommended
14		Fatigue, due to heat or private actions after the shift ends	8	10	5	400	SIGNIFICANT RISK	Monitor employees that come on duty for KHAT and minimise driving hours
15		Severe vehicle damage	10	10	8	800	HIGH RISK	Training and monitoring essential to prevent accidents and consequent damage
16		Bumping into employees during loading or off loading	7	10	8	560	SIGNIFICANT RISK	All employees working in and around heavy duty vehicles to don reflective vests at all times.
17	Diesel spillage	Spillage during tank to tank transfer	6	4	4	96	LOW RISK	Ensure all equipment is in a good state of repair



18	Soil contamination	8	5	4	160	LOW RISK	All units to be installed in a bund wall with a concrete floor to prevent soil contamination
19	During transport and an accident occur	8	5	5	200	SLIGHT RISK	Speed limit to be introduced and monitored. Only fill containers three quarters.
20	Fire from open fires in the area	5	4	3	60	LOW RISK	No open flames in the area and cleaning procedures to be adhered to.

There are many other risks that can be identified but these will be recorded during the construction phase and then during the operational phases. It is vital that a hazard identification and risk assessment process is conducted on a monthly basis as per the specific procedure.

5.2 TRAINING

Training is of prime importance and it is imperative that all employees receive the following training.

The training courses must at the least contains the following

Employees

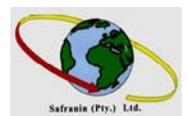
- Fire Prevention and Equipment Training
- General Health and Safety Training
- Occupational Hygiene Training
- Emergency procedures and Actions

Supervisors

- Health and Safety for Supervisors
- Hazard Identification and Risk Assessment
- Lake Assal Policies and Procedures
- Occupational Hygiene Training
- Hazardous Chemical Substances

Elected employees

- Health and Safety Representative Training
- First Aid Training
- Accident / Incident Investigation



5.3 CONTRACTORS

All contractors must comply with the following and management must ensure that the documentation and records is in place at all times.

Every contractor will:-

Compile a health and safety file containing the following documents

Procedures pertaining to:-

- Accident investigation and prevention
- Inspections and record keeping
- Machine guarding
- Personal Protective equipment (Issue and use)
- Ladders and scaffolding
- Excavations and demarcation

Training of employees on the following:-

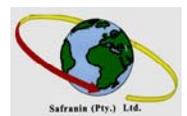
- Personal Protective Equipment
- Fire prevention
- First Aid
- General Health and Safety

6. CONCLUSIONS.

It is vital that the development and implementation of the proposed Occupational Health and Safety Assessment series 18001 is approved and implemented at all levels within the company. Manpower is a very important aspect of any organisation and it is the moral duty of an organisation to ensure the lives of employees are protected as far as reasonable practicable. A system to be developed for immediate attention in the event of an injury or multiple injuries. It is therefore necessary to ensure the training of all first aiders is of a high standard and that a medical station is erected and manned to ensure proper care for seriously injured employees. The fact that Lake Assal is 100 km from Djibouti the lack of medical facilities can result in unwanted deaths which can be very costly for both company and family members.

Safranin (Pty) Ltd is in the process of developing the standards, policies and procedures for the system and will forward them as soon as they are finalised. The system is set out in section 7 recommendations.

There are several high risks identified and control measures can be introduced without a big outlay of capital. It is imperative that the management team appoint responsible people into positions of accountability and to clearly state their expectation from these employees.



The hazards identified require immediate attention and it is therefore necessary to implement the register as soon as possible. The development of an accident / incident investigation programme is of prime importance and the following accident and incidents must be investigated and recorded.

- Environmental incidents
- Minor accidents (First aid cases)
- Serious a injuries (More than first aid)
- Building and / or property damage

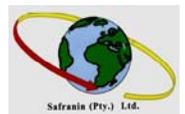
The proposed health and safety programme must be supported by management and driven by a strong person to ensure compliance at all times.

The training of all employees is of prime importance and as discussed in section 7, all levels of employees should receive training. Training must be an ongoing action and proper planning is required to ensure the correct information is passed to employees. All employees should undergo a medical examination and be declared fit for work.

7. RECOMMENDATIONS.

It is not going to be easy to implement some of the recommendations nevertheless the management must endeavour to implement the recommendations. A it is vital that an implementation matrix is drawn up and reliable dates be set to achieve the different aspects.

- 7.1 Management will have no control over the sale of khat outside the gates of the living quarters. It is therefore vital that no khat is allowed onto the property and used on site. The rules pertaining the use and possession must be made clear to all employees. Security to be authorised to conduct random searches of any article entering the premises and all khat to be confiscated.
- 7.2 The operating of heavy duty vehicles is a dangerous occupation and the following rules and procedures to be developed and implemented:-
 - 7.2.1 The spacing of vehicles on the road is of prime importance to allow dust to settle and to prevent driving into the dust cloud. In some instance this will be unavoidable. It is necessary to investigate the use of a chemical suppressants using the admix method, blending the product with the top few inches of surface material. Suppressants may also be applied as surface treatments.
 - 7.2.2 Vehicles to be inspected and the findings recorded on a daily basis.
 - 7.2.3 Adequate breaks for the drivers between trips to eliminate possible driver fatigue.
 - 7.2.4 Additional lights to be installed to allow clear vision at night time, but it must be able to dim to prevent the blinding of a driver approaching the vehicle on the road.
 - 7.2.5 Lights to be functional during day time driving.
 - 7.2.6 All trailers to be fitted with reflective tape as indicated in the picture to allow easy and early identification from a distance.





7.3 The storage of diesel in above level ground tanks.

The possibility of spillages is very high and all spillages can come from various areas during the decanting process.

- 7.3.1 All tanks to be display all the recommended safety symbolic signs.
- 7.3.2 Fire equipment to be available at all storage depots.
- 7.3.3 All tanks to be earthed properly to the ground.
- 7.3.4 A specific off loading procedure to be drawn up and implemented.

7.4 Training.

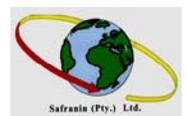
All contractors must receive induction training before they can enter the premises to conduct construction work.

The Induction course should contain the following aspects

- Use of personal protective equipment
- Fire prevention
- Environmental aspects and pollution prevention
- Safety signs and notices
- Rules and regulations of Lake Assal
- Accident reporting procedures
- Drug Policy (Khat)

7.5 The health and safety officer of Salt Investments must conduct the following inspections as per the inspection matrix.

			Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	Fire Equipment	See Checklist												
2	First Aid Boxes	See Checklist												
3	Personal Protective Equipment	See Checklist												
4	Hygiene (Water Containers)													
5	General H&S Inspections	See Checklist												
6	Motorised Equipment	See Checklist												
7	Ladders	See Checklist												
8	Portable Electrical Equipment	See Checklist												
9	Facilities	See Checklist												



- 7.6 It is recommended that the Occupational Health and Safety Assessment Series 18001 are implemented.

This will ensure that all aspects of the proposed health and safety programme are introduced at all levels of the work force.

The system will consist of different procedures and policies that will ensure that all aspects are regularly monitored and kept up to date within the work environment, every section and sub section will be clearly defined and programmes identified to ensure the system is adhered to.

The system will consist of the following main categories

1. MANAGEMENT RESPONSIBILITIES

- 1.1 Health and Safety Appointments
- 1.2 Objectives & Targets

2. DOCUMENT CONTROL

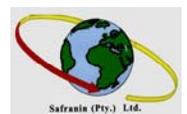
- 2.1 Record Keeping

3. COMMUNICATION

- 3.1 Health & Safety Committees
- 3.2 Internal / External Communication

4. OPERATIONAL CONTROL

- 4.1 Accident Investigation and Recording
- 4.2 Hazard Identification & Risk Assessments
- 4.3 Machine Guarding
- 4.4 Motorised Equipment: Checklist, Licensing
- 4.5 Condition of Vehicles/ Equipment
- 4.6 Health & Safety Notices and Signs
- 4.7 Hazardous Chemical Substances
- 4.8 Lifting Machines and Lifting Tackle
- 4.9 First Aid Equipment & Training
- 4.10 Personal Protective Equipment
- 4.11 Portable Electrical equipment
- 4.12 Ladders, Stairs & Walkways
- 4.13 General Electrical Installations
- 4.14 Labelling of Electrical Switch-Gear and Critical Valves
- 4.15 Ergonomics
- 4.16 Lock-out-Procedures
- 4.17 Design Specifications: Manufacturing, Purchasing and Engineering Control – New Plant, and Modifications
- 4.18 Contractor and Contracts Control
- 4.19 Written Safe Work Procedures / Job Observations



- 4.20 Work Permits
- 4.21 Illumination
- 4.22 Ventilation
- 4.23 Sanitation, Plant Hygiene Amenities

5. SYSTEM AUDITS

- 5.1 System Review
- 5.2 Annual Self Audits
- 5.3 Inspections and Action
- 5.4 Inspection register

6. CORRECTIVE AND PREVENTATIVE ACTION

- 6.1 Internal Incident Investigation
- 6.2 Health & Safety Accident / Incident Records

7. EMERGENCY PREPAREDNESS AND RESPONSE

- 7.1 Management of Fire Risks
- 7.2 Fire Emergency Equipment Accessible and Visible
- 7.3 Maintenance of Fire Protection Equipment
- 7.4 Storage of Flammables Chemicals and Explosive Material
- 7.5 Emergency Alarm System
- 7.6 Security System

8. HEALTH & SAFETY TRAINING

- 8.1 Health and Safety Training

9. MONITORING AND MEASUREMENT

- 9.1 Statistics

7.7 It is recommended that the following health and safety audits are conducted and recorded as soon as the construction commences and then during the operation of the plant.

- Fire prevention audit
- Personal protective equipment audit
- Safety symbolic sign audit
- Occupational hygiene survey (Illumination Noise, heat)
- Machine guard survey

