



**REPORT**

# International Cyanide Management Code, Transport Recertification – Summary Audit Report

*Alistair James Company Ltd (Alistair Logistics)*

Submitted to:

**International Cyanide  
Management Institute (ICMI)**  
1400 I Street, NW  
Suite 550  
WASHINGTON DC 20005  
UNITED STATES OF AMERICA

**Alistair Logistics**  
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Alistair Group

Submitted by:

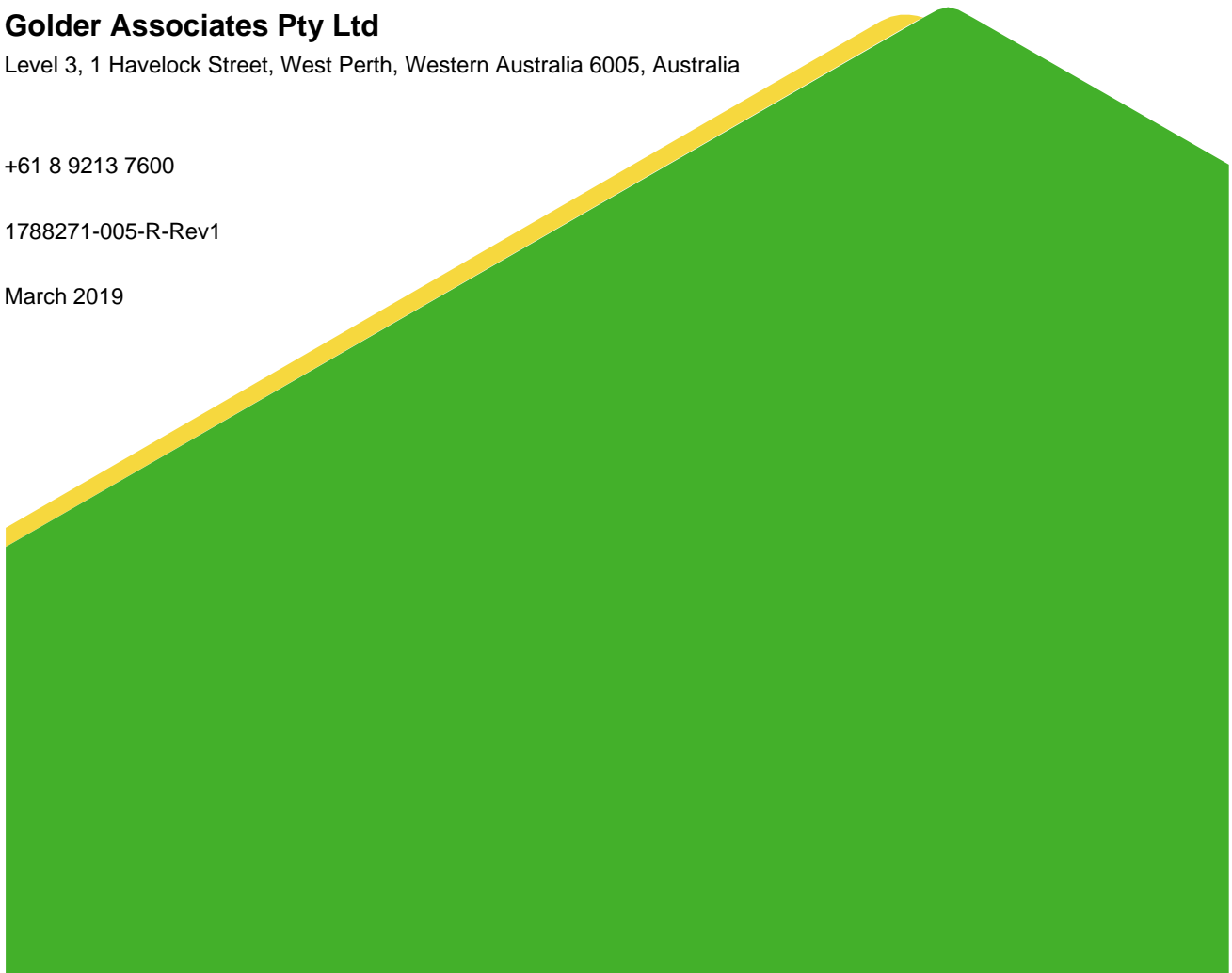
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1788271-005-R-Rev1

March 2019



## Distribution List

1 electronic copy – International Cyanide Management Institute

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\_\_\_\_\_  
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Signature of Lead Auditor

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## 1.0 INTRODUCTION

### 1.1 Operational information

<b>Name of Transportation Facility:</b>	Alistair James Company Ltd
<b>Name of Facility Owner:</b>	Not Applicable
<b>Name of Facility Operator:</b>	Alistair Logistics
<b>Name of Responsible Manager:</b>	George Alando, QHES Manager, Alistair Group
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## 2.0 DESCRIPTION OF OPERATION

### 2.1 Alistair James Company Ltd (Alistair Logistics)

Alistair Logistics is part of Alistair James Company Ltd (also referred to as Alistair Group) and is headquartered in Dar es Salaam, Tanzania, with offices in Mtwara, Tanzania; Pemba, Mozambique; South Africa; Zambia and Kampala, Uganda.

Alistair Logistics provides transport of cargo from Dar es Salaam port to the neighbouring countries of East, Central and Southern Africa. Alistair Logistics provides transport services to a variety of clients in the oil and gas, mining and freight forwarding industries.

### 2.2 Cyanide Transport

Cyanide is transported by Alistair Logistics from the Port of Dar es Salaam, Tanzania to gold mines in Tanzania and the Democratic Republic of Congo. During the certification period, Alistair Logistics had transported cyanide to:

- Shanta Gold's New Luika Gold Mine in Tanzania (ceasing transport in 2016)
- Pamoja Mining's Pamoja Mine in Tanzania (ceasing transport in 2016)
- Banro's Namoya Mine in Democratic Republic of Congo
- Banro's Twangiza Mine in Democratic Republic of Congo
- WEMA chemicals (distributor), Mwanza Warehouse (one delivery).

### 2.3 Transit Storage

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. Following collection from the port, containers may be temporarily stored on trailers at the Alistair Logistics overnight in preparation for departure to the customer mine sites the following morning. At no stage is cyanide removed from the trucks or containers prior to unloading at customer mine sites.

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## 2.4 Auditor’s Findings and Attestation

in full compliance with

**Alistair Logistics is:**  in substantial compliance with **The International Cyanide Management Code**

not in compliance with


No significant cyanide exposures or releases were noted to have occurred during the Alistair Logistics Transport Recertification audit.

**Audit Company:** Golder Associates Pty Ltd

**Audit Team Leader:** Ed Clerk, Exemplar Global (105995)

**Email:** [eclerk@golder.com.au](mailto:eclerk@golder.com.au)

### 1.1 Name and Signatures of Other Auditors

Name	Position	Signature	Date
Ed Clerk	Lead Auditor and Transport Technical Specialist		12 March 2019


## 2.5 Dates of Audit

The ICMC Certification Audit of Alistair Logistics was conducted over two days between 18 and 19 September 2018.

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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\_\_\_\_\_  
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### 3.0 CONSIGNOR SUMMARY

#### 3.1 Principle 1 – Transport

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

##### 3.1.1 Transport Practice 1.1

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

in full compliance with  
**Alistair Logistics is**  in substantial compliance with **Transport Practice 1.1**  
 not in compliance with

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

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

Alistair Logistics has implemented a procedure for selecting transport routes that minimises the potential for accidents and releases or the potential impacts of accidents and releases. It considers population density, infrastructure, pitch and grade and environmental factors such as water bodies and fog along the route.

The Quality, Health, Environment and Safety (QHES) Manager together with a driver travels the route to the customer collecting information on the route conditions and then considers the risk associated with hazards and features identified along the route prior to undertaking transport of cyanide. The route assessments are documented.

Alistair Logistics has implemented a procedure to evaluate the risks of selected cyanide transport routes and take the measures necessary to manage these risks.


Route risk assessments have been completed for all cyanide transport routes. The route assessments include descriptions and photographs of hazards that have been identified and assessed along the route.

Alistair Logistics has developed a Cyanide Transport Management Plan (CTMP) that outlines the measures to be undertaken during transport including escorts, convoys and speed reduction.

A Transportation Route Analysis and Risk Assessment procedure provides for periodic re-evaluation of routes used and a process for getting feedback on route condition from the drivers and convoy leaders. All convoys require both a Convoy and Route Conditions Feedback Form to be completed during and after a cyanide delivery. Completed convoy feedback forms were observed for a selection of trips from 2015 to 2018.

Alistair Logistics has established mechanisms to document the measures taken to address risks identified with selected routes. The route assessments cover the port of entry to the mine site and include measures to address identified risks. This is supplemented by the CTMP and the route reviews and inspections carried out by the drivers and convoy leader.

Alistair Logistics seeks input from communities, other stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures.

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A Transportation Route Analysis and Risk Assessment procedure details the route selection and assessment process. The procedure includes meeting with the relevant stakeholders to discuss the route. Stakeholders to be consulted include:

- The prospective customer
- Tanroads and International Equivalentents
- Government Chemist Laboratory Agency (GCLA)
- Hospitals
- Emergency service providers.

Completed route assessments include stakeholder contact details. The QHES Manager completes the assessments including consultation with the listed stakeholders.

Alistair Logistics has adopted security arrangements for all cyanide convoys including escorts, container door seals and constant GPRS (General Packet Radio Services) tracking as standard for the operation.

Alistair Logistics has advised external responders and medical facilities of their roles during an emergency. Consultation is undertaken through the route assessment process and the names and contact details for those consulted that have or may have to be notified of an incident are provided in an Emergency Contacts List.

Alistair Logistics does not subcontract cyanide transport.

### 3.1.2 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.**

**Alistair Logistics is**  **in full compliance with** **Transport Practice 1.2**  
 in substantial compliance with  
 not in compliance with


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

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

Alistair Logistics only uses trained, qualified and licensed operators to operate its transport vehicles. Drivers must hold a valid Tanzanian Driver’s license for the class of vehicle and have completed the required Alistair Group Driver Training.

Convoy Leaders have additional training requirements and undertake Advanced Cyanide Awareness Training

All driver training material is translated into Swahili, the local language of the drivers. Personnel operating cyanide handling and transport equipment have been trained to perform their jobs in a manner that minimises the potential for cyanide releases and exposures. Alistair Logistics only transports solid cyanide in sealed shipping containers that are placed on the trucks by port operators and removed by the mine.

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Each driver completes the Alistair Group Initial Driver Training, which includes cyanide awareness training, convoy rules, driving limits, accident response and spill control and fitness for work.

Alistair Logistics does not subcontract cyanide transport.

### 3.1.3 Transport Practice 1.3

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

**in full compliance with**  
**Alistair Logistics is**  in substantial compliance with **Transport Practice 1.3**  
 not in compliance with

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

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

Alistair Logistics only uses equipment designed and maintained to operate within the loads it will be handling when transporting cyanide. Alistair Logistics has a fleet of prime movers and flatbed trailers that are sufficiently rated to carry the load. Each truck and trailer unit carry one shipping container which is well within the design load limits.


Alistair Logistics has implemented a preventative maintenance and inspections system to maintain vehicles and trailers. The inspection system includes pre- and post-shipment inspections. Work orders are raised to address any defects or faults identified during the inspections.

There are procedures to verify the adequacy of the equipment for the load it must bear. The truck and trailer inspection require a visual inspection of the truck and trailer and the trailer inspection includes an assessment of the condition of floor and chassis, lights, legs, jacking, springs, brake booster, axels, roller joins, wheels and locking lugs.

Container tracking checklists include a requirement to list the weight, ISO number, and Dangerous Good (DG) or UN Number. They also include an inspection of container integrity.

Alistair Logistics retains a file for each destination and retains the completed checklists and forms for each delivery. There are procedures in place to prevent overloading of the transport vehicle being used for handling cyanide. The CTMP details the general requirements for convoys including the requirement of only one container of cyanide to be loaded onto each truck. A single container is within the rated loading limits of the transport vehicle.

Alistair Logistics does not subcontract cyanide transport.

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### 3.1.4 Transport Practice 1.4

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

**Alistair Logistics is**  **in full compliance with** **Transport Practice 1.4**  
 in substantial compliance with  
 not in compliance with

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

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

Alistair Logistics has procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer’s packaging. The CTMP requires the fitting of door seals at the time containers are received from the port and these are checked during and at the completion of the delivery. The container tracking checklist includes a check on door seals.

Placards or other signage are used to identify the shipment as cyanide, as required by local regulations and international standards. Vehicle placarding consists of the following:

- One Emergency Information Panel (EIP). This is done by the distributor/producer; and is placed on the rear of the container so that it is visible from the rear
- One Class 6 dangerous goods diamond shaped label placed on the front of the vehicle
- Red flags.

Convoy Leaders are required to check that this signage is in place prior to departure. Alistair Logistics has implemented a safety program for cyanide transport that includes (where appropriate or applicable) the following:

a) *Vehicle inspections prior to each departure/shipment*


Vehicle inspections of the trucks, trailers and escort vehicles are completed by the drivers and Convoy Leader prior to each shipment. A review of convoy documentation and interviews with personnel confirmed that inspections are completed prior to each shipment for the vehicles involved.

b) *A preventative maintenance program*

The operation has an established preventative maintenance program that involves regular inspections and maintenance by qualified mechanics. The operation uses a maintenance management system to track and schedule preventative maintenance activities. A review of maintenance records and maintenance schedule confirmed that the operation has implemented a preventative maintenance program.

c) *Limitations on operator or drivers’ hours*

The operation has set a limit of 13 hours for drivers and this is further restricted to day time operations. Overnight driving is not permitted with the exception of early departures from the port to avoid traffic

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d) *Procedures to prevent loads from shifting*

The operation transports full shipping containers that are locked and sealed. The containers are secured to the vehicle using four container twist locks that are integral to the trailer.

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

The CTMP provides the procedures by which transportation can be modified or suspended. This is undertaken in consultation with the Alistair Logistics operational Leaders.

f) *A drug abuse prevention program*

Alistair Logistics has developed a substance abuse policy covering alcohol and drugs that includes provisions for random and for cause testing. The CTMP also provides rules for convoys including prohibiting alcohol consumption. Alcohol testing is completed daily on each morning of the delivery.

Training is provided through Alistair Group Initial Driver Training on the induction process on company standards and a breathalyser for alcohol is being installed at the company depot.

g) *Retention of records documenting that the above activities have been conducted*

The operation retains a file for each destination and retains the completed checklists and forms for each delivery.

Alistair Logistics does not subcontract cyanide transport.

### 3.1.5 Transport Practice 1.5

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

in full compliance with

**Alistair Logistics is**

in substantial compliance with

**Transport Practice 1.5**

not in compliance with

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

Transport Practice 1.5 is NOT APPLICABLE. Alistair Logistics does not transport consignments of cyanide by sea or air within the scope of this audit.

### 3.1.6 Transport Practice 1.6

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

in full compliance with

**Alistair Logistics is**

in substantial compliance with

**Transport Practice 1.6**

not in compliance with

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

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

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Transport vehicles do have a means to communicate with the transport company, the mining operation, the cyanide producer or distributor and/or emergency responders.

Each convoy has a mobile phones and radios for communication. In addition, the convoys are tracked via an electronic real time tracking system. The GPRS tracking system is supplemented by satellite tracking in the escort vehicles in areas where GPRS coverage is not available.

The trucks are fitted with GPRS and the escort vehicles with satellite tracking. The communication equipment, mobile phones and radios, are periodically tested to ensure they function properly. Checks on the equipment are undertaken as part of its continued use and during the pre-departure checks.

The operation has implemented procedures to manage mobile phone blackout areas along the transport route. These are managed using multiple cell phone providers and satellite phones can also be made available to the escort personnel if required.

No blackout areas exist along the route where all communication systems and satellite tracking are simultaneously unavailable.

The operation has an online tracking system and each convoy is monitored. The online tracking system provides real time information on the location of the vehicle, whether the vehicle engine is running or not, whether it is moving or stationary and for how long. This information is provided for each vehicle and can be accessed via the main system or mobile phone application. The system has also been enabled to send alerts for unscheduled stops or departures from routes.

Alistair Logistics does implement inventory controls and chain of custody documentation to prevent loss of cyanide during shipment.

The container weight and number are recorded, and a unique seal is attached to the container upon arrival in Tanzania in accordance with government requirements.

Container condition and inspection sheets note the seal numbers and is signed off by the client to confirm all goods have been received, unopened and undamaged.

Shipping records indicating the amount of cyanide in transit and Safety Data Sheets are available during transport. Each shipment has a government permit that details the amount of cyanide and this is reflected in the convoy records. Safety Data Sheets are carried by the escort drivers in both English and Swahili.

Alistair Logistics does not subcontract cyanide transport.

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### 3.2 Principle 2 – Interim Storage

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

#### 3.2.1 Transport Practice 2.1

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

in full compliance with

Alistair Logistics 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.

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. Following collection from the port, containers may be temporarily stored on trailers at the port in preparation for departure to the customer mine sites. At no stage is cyanide removed from the trucks or containers prior to unloading at customer mine sites.

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### 3.3 Principle 3 – Emergency Response

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

#### 3.3.1 Transport Practice 3.1

Prepare detailed Emergency Response Plans for potential cyanide releases.

in full compliance with

Alistair Logistics is

in substantial compliance with

Transport Practice 3.1

not in compliance with

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

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

Alistair Logistics does have an Emergency Response Plan (ERP). The ERP provides guidance for Alistair Logistics in the overarching approach for the management of emergencies. Specific emergency information regarding cyanide is detailed in the CTMP which contains response actions, spill scenarios and responsibilities. The CTMP is appropriate for the selected transportation routes and there are no interim storage facilities. The CTMP considers spill scenarios and incidents involving fires, spillage and handling wet cyanide. This combined with the route risk assessments provides route specific response actions.

The CTMP does consider the physical and chemical form of cyanide. The CTMP has been developed for solid cyanide which is the only form of cyanide transported. The CTMP does consider liquid cyanide spills should solid cyanide come into contact with water.

The CTMP does consider the method of transport. The CTMP is specific to the road transport of cyanide in Intermediate Bulk Containers (IBCs) within shipping containers. Alistair Logistics does not transport other forms of cyanide or use other methods of transport.

The CTMP does consider the transport infrastructure from the port to the mine site. The route risk assessments encompass the pick-up and delivery which includes port and road infrastructure. Cyanide is not collected from railways or transported by rail.

The CTMP does consider the design of the shipping container and wooden IBCs. This is considered in the spill response guides and description of material transported. The CTMP does address spillage inside the shipping container and decontamination arrangements.

The CTMP does include descriptions of response actions, as appropriate for the anticipated emergency situation. The plan contains a series of response guides to identified emergency situations and provides response actions. The plan also provides roles and responsibilities applicable to the management of emergencies and specific roles in the management of emergencies.

The CTMP does identify the roles of outside responders, medical facilities or communities in emergency response procedures. The CTMP reflects the general responsibilities of outside responders and medical facilities and the role the police take in emergency situations.

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### 3.3.2 Transport Practice 3.2

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

in full compliance with

**Alistair Logistics is**

in substantial compliance with

**Transport Practice 3.2**

not in compliance with

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

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

Alistair Logistics provides emergency response training for appropriate personnel. Training is provided through the cyanide awareness training package and through mock exercises. The cyanide awareness package is provided in English and Swahili and drivers, convoy leaders and operational personnel have completed the course.

The operation has undertaken annual simulated mock exercises and desktop exercises that involved management personnel and convoy leaders and familiarisation with emergency response procedures and actions in the event of an emergency. Simulations have involved both exposures and environmental releases.

The CTMP provides descriptions of the specific emergency response duties and responsibilities of personnel.

There is a list of all emergency response equipment that should be available during transport or along the transportation route. Alistair Logistics has developed checklists for the equipment that are to be carried by the escort vehicles as required by the CTMP. The checklists address the cyanide spill response equipment and general spill response equipment along with HCN detectors and communications equipment.

The transporter has available the necessary emergency response and health and safety equipment, including personal protective equipment during transport. A site inspection of the emergency response vehicle confirmed that equipment listed on the checklists was available and HCN monitors and radios.

Transport vehicle operators receive initial and periodic refresher training in emergency response procedures including implementation of the Emergency Response Plan. Response to cyanide incidents forms part of the cyanide awareness training that is completed regularly for drivers. Cyanide Awareness training is scheduled to be completed annually.

There are procedures to inspect emergency response equipment and assure its availability when required. The checks are completed prior to departure for each convoy by the convoy leader and collated with delivery documentation. The CTMP details the inspections to be conducted and those personnel responsible for conducting the checks.

Alistair Logistics does not subcontract cyanide transport.

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### 3.3.3 Transport Practice 3.3

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

in full compliance with

**Alistair Logistics is**

in substantial compliance with

**Transport Practice 3.3**

not in compliance with

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

Alistair Logistics is in FULL COMPLIANCE with Transport Practice 3.3 requiring that they develop procedures for internal and external emergency notification reporting.

There are procedures and current contact information for notifying the shipper, the receiver/consignee, regulatory agencies, outside response providers, medical facilities and potentially affected communities of an emergency. The CTMP details the names and contact information for key stakeholders and the route assessment details the contact information for identified responders. There are systems in place to ensure that internal and external emergency notification and reporting procedures are kept current.

The CTMP is reviewed on an annual basis and following incidents, emergencies, mock exercises and audits. The plan is updated as needed.

All procedures are listed on a review schedule, which highlights dates and a responsible person for the review.

### 3.3.4 Transport Practice 3.4

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

in full compliance with

**Alistair Logistics is**

in substantial compliance with

**Transport Practice 3.4**

not in compliance with

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

Alistair Logistics is in FULL COMPLIANCE with Transport Practice 3.4 requiring the operation to develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

Alistair Logistics has implemented procedures 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. Drivers and Convoy leaders are the first responders in an incident, guidance on the specific roles for the Convoy Leader, Escort Driver and Convoy Drivers is provided in CTMP.

External responders are responsible for the secondary response as per the Spillage Emergency Response Guides (SERG) in the CTMP. Emergency Response Guides (ERGs) detail decontamination of a sea container and the process and precautions to follow when decontaminating a spill of solid cyanide to soil. The process involves consultation with the regulator and mine as to the most suitable disposal options.

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The procedure does prohibit the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water. The ERG states that Alistair Logistics subscribes to the recommendations of the ICMC in that no chemicals are to be added to a flowing water way in the event of a cyanide spill as these may only exacerbate the situation with their own toxicity characteristics.

### 3.3.5 Transport Practice 3.5

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

in full compliance with

**Alistair Logistics is**

in substantial compliance with

**Transport Practice 3.5**

not in compliance with

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

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

There are provisions for periodically reviewing and evaluating the CTMP’s adequacy and they are being implemented. The CTMP is reviewed on an annual basis and following incidents, emergencies, mock exercises and audits. The CTMP is updated as needed. The CTMP was first developed in January 2014 and there have been four revisions of the document since inception.

Provisions are in place for periodically conducting mock emergency drills. The CTMP provides for the conduct of Driver Cyanide Awareness and Advanced Driver Awareness training, in addition to annual emergency response simulation drills.


Alistair Logistics has completed three simulated emergency response exercises and three desktop exercises to date.

There is a procedure to evaluate the CTMP’s performance after its implementation and revise it as needed, it is stated in the front of the CTMP. At the time of the audit the operation had not had cause to activate the plan.

## 4.0 IMPORTANT INFORMATION

Your attention is drawn to the document titled – “Important Information Relating to this Report”, which is included in Appendix A of this report. The statements presented in that document are intended to inform a reader of the report about its proper use. There are important limitations as to who can use the report and how it can be used. It is important that a reader of the report understands and has realistic expectations about those matters. The Important Information document does not alter the obligations Golder Associates has under the contract between it and its client.

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Name of Facility

  
\_\_\_\_\_  
Signature of Lead Auditor

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## Signature Page

### **Golder Associates Pty Ltd**



Ed Clerk  
*ICMC Lead Auditor and ICMC Transportation Expert*

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**APPENDIX A**

**Important Information**

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The scope of Golder's Services and the period of time they relate to are determined by the Contract and are subject to restrictions and limitations set out in the Contract. If a service or other work is not expressly referred to in this Report, do not assume that it has been provided or performed. If a matter is not addressed in this Report, do not assume that any determination has been made by Golder in regards to it.

At any location relevant to the Services conditions may exist which were not detected by Golder, in particular due to the specific scope of the investigation Golder has been engaged to undertake. Conditions can only be verified at the exact location of any tests undertaken. Variations in conditions may occur between tested locations and there may be conditions which have not been revealed by the investigation and which have not therefore been taken into account in this Report.

Golder accepts no responsibility for and makes no representation as to the accuracy or completeness of the information provided to it by or on behalf of the Client or sourced from any third party. Golder has assumed that such information is correct unless otherwise stated and no responsibility is accepted by Golder for incomplete or inaccurate data supplied by its Client or any other person for whom Golder is not responsible. Golder has not taken account of matters that may have existed when the Report was prepared but which were only later disclosed to Golder.

Having regard to the matters referred to in the previous paragraphs on this page in particular, carrying out the Services has allowed Golder to form no more than an opinion as to the actual conditions at any relevant location. That opinion is necessarily constrained by the extent of the information collected by Golder or otherwise made available to Golder. Further, the passage of time may affect the accuracy, applicability or usefulness of the opinions, assessments or other information in this Report. This Report is based upon the information and other circumstances that existed and were known to Golder when the Services were performed and this Report was prepared. Golder has not considered the effect of any possible future developments including physical changes to any relevant location or changes to any laws or regulations relevant to such location.

Where permitted by the Contract, Golder may have retained subconsultants affiliated with Golder to provide some or all of the Services. However, it is Golder which remains solely responsible for the Services and there is no legal recourse against any of Golder's affiliated companies or the employees, officers or directors of any of them.

By date, or revision, the Report supersedes any prior report or other document issued by Golder dealing with any matter that is addressed in the Report.

**Any uncertainty as to the extent to which this Report can be used or relied upon in any respect should be referred to Golder for clarification**



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