

***INTERNATIONAL CYANIDE  
MANAGEMENT INSTITUTE***

***Cyanide Transportation  
Summary Audit Report***

***For***


***Beagle Shipping S.A.***



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Name of Cyanide Transport Operation:	Beagle Shipping S.A.	
Name of the Company Ownership	Beagle Shipping S.A.	
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## Location and Description of the Operation


Beagle Shipping S.A. (Beagle) is a trucking company that belongs to Grupo Beagle, Peruvian organization with more than 480 workers, that has been operating in various sectors of the economy for 29 years, providing comprehensive logistics services in customs management, international cargo, national and international logistics management.

Beagle Shipping S.A. (Beagle) is certified in the International Cyanide Management Code, BASC (Business Alliance for Secure Commerce), ISO 14001 Environmental Management, ISO 45001 Occupational Health and Safety, ISO 28000 Security Management Systems for the Supply Chain and ISO 37001 Anti-Bribery Management Systems.

Beagle has a modern fleet of more than 140 trucks capable to transport different types of cargo as: general, refrigerated, IMO (international Maritime Organization), HAZMAT (Hazardous Materials), Sodium Cyanide and ethanol / methanol, among others.

The scope of this recertification audit is the solid sodium cyanide transport operation between Callao Port to warehouses and to mining clients.

Cyanide is transported by truck in 20-foot maritime containers. Around 20 tons (t) of sodium cyanide is placed in the container in 1-ton Intermediate Bulk Containers (IBC) and in metal drums containing sodium cyanide. IBCs and drums are placed in a way to prevent lateral movement within the container. Containers are received and delivered locked and tagged. No container is opened.

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## Auditor's Finding


This operation is

- in full compliance
- ✓ in substantial compliance
- not in compliance

with the International Cyanide Management Code.


During the previous three-year audit cycle, this operation experienced noncompliance with Code requirements. The Corrective Action Plan to bring this operation in substantial compliance into full compliance is enclosed with this Summary Audit Report. The plan must be fully implemented within one year of the date of this audit.

The operation has not experienced any significant cyanide incidents, releases, or exposures during this period.

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Transportation Technical Auditor:	Maria del Pilar Arrese	Sign: 
Date(s) of Audit	February 26 - 27, 2020	

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 International Cyanide Management Code Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

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## Detailed Audit Report

### Principle 1, Transport

Transport cyanide in a manner that minimizes the potential for accidents and releases.

#### Transport Practice 1.1:

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

The operation is:

- in full compliance with Transport Practice 1.1
- in substantial compliance
- not in compliance


Discuss the basis for this Finding/Deficiencies Identified:

Beagle has implemented the procedure Road Risk Management which covers all the cyanide transport process from route assessment cyanide loading and download and verification of effectiveness of security controls. The route analysis and evaluation considers dangerous curves, steep climbs, steep descents, population density, resting places, main cities or municipalities, significant bridges, railroad crossings, landslide areas, snow, ice, water, fog areas, environmentally sensitive areas and overnight places, among others. The update of the routes is annual, as indicated by their contingency plan.

The procedure Road Risk Management includes risks evaluations of the selected transport routes. By mean of the register Route Risk Assessment Matrix, they take the necessary measures to manage these risks. The auditor reviewed examples of the measures taken, through the annotations made in the risk matrices for the route from Callao to Lurín, covering the recertification period.

The transporter's procedure *Documentation Control* states documentation may be modified as a result of any change or improvement in the process, for accidents or incidents, non-conformities, corrective actions or changes in current regulations. The route risk assessment matrix reviewed was updated on February 2020. However, there was insufficient evidence of the periodic evaluation of the route for the delivery of cyanide to Almacenera Pacifico – Lurín during the recertification period. After the audit, Beagle sent to the auditor evidence a recent route reevaluation for the cyanide deliveries road, which was found in conformity.

For getting feedback on route conditions from the transporter's operators, Beagle's head of transport plans the activities to identify hazards on transport routes, through roadmaps called Rutagrama which is the evidence of the follow-up during the trip.

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The transporter documents the measures taken to address risks identified with the selected routes in the roadmaps reviewed, in the route risk matrix, company policies, procedures and emergency response plan.. In addition the emergency response plan, there is a list of risks identified during transport, including situations during loading and unloading and indicating the necessary control measures. Precautions are taken along the road although being a short section of transfer in these cases.

The transporter seeks input from its clients and from the applicable governmental agencies as necessary in the selection of routes and development of risk management measures. The carrier evaluates the route to be taken, which has been previously reviewed with the customer and according to local regulations. During this recertification period Beagle transported sodium cyanide between Port of Callao and Lurín district, located 25 km to the south, in Lima’s metropolitan area. In case Beagle has to transport cyanide to a mine site, they will communicate with communities in the influence area of the mine operation site to seek input, in coordination with the mine operation.

Where routes present special safety or security concerns, the transporter uses convoys, with a pickup vehicle as escort to address the concern. Beagles procedure Sodium Cyanide Transport Procedure states the convoy modality will be at one escort van for every five transport units or fraction for domestic travel. The convoy may include one or more vehicles as an escort at the request of the transport the client.

Beagle has advised external responders about their roles during an emergency response regarding their roles and the necessary aid to provide. The documentation and communications delivered to the parties involved during the transport of cyanide is registered. The auditor reviewed the letters sent to firefighters and hospitals during the recertification period.

All Beagle’s cyanide transport operations are performed with their own trucks and employees. The company do not subcontract any of the cyanide handling or transport.


**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.

The operation is:

- in full compliance with Transport Practice 1.2
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

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Beagle uses only trained, qualified and licensed operators to operate its transport vehicles. The company maintains documents demonstrating his drivers are qualified and have received adequate operational and safety training. Records were available for all current cyanide drivers to demonstrate that qualification and training requirements were met.

Interviews with drivers, dispatch, administration and maintenance personnel, as well as training records, were used to confirm that all personnel operating the cyanide transport equipment are trained to perform their work safely and properly. Beagle’s annual training program includes training in cyanide management, first aids and performing mock drills.

Beagle does not subcontract cyanide handling or transport.

**Transport Practice 1.3:**

Ensure that transport equipment is suitable for the cyanide shipment.


The operation is:

- in full compliance with Transport Practice 1.3
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

The transporter uses the appropriate trucks and trailers designed and maintained to operate within the loads it will be handling. Each tractor-semitrailer configuration has passed local authorities’ inspections regarding weights and measures which specifies the maximum load the vehicle can transport. The semitrailer's ownership card indicates the allowable load, in accordance with the Transport and Communications Ministry (MTC) regulations. Fleet specification files were available for review during the audit. The tractors and trailers were found to be capable of carrying the loads for which they were being used.

Beagle procedure Sodium Cyanide Transportation establish the activities, controls, registers and necessary indicators to execute the transport service, which includes procedures to verify the adequacy of the equipment for the load it must bear. The procedure require drivers to perform vehicle pre-use checklist and to the maintenance area to approve the availability of the vehicles before any transport operation. On reception of the service requirement, is reviewed the load and quantity of containers to ensure the vehicles adequacy. With this information is assigned transport unit and the driver that would comply with the service requirement.

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The procedure for sodium cyanide transportation establishes the safety measures to prevent overloading of the transport vehicle. Beagle has established that each platform will load only one cyanide container and that each truck can only haul one platform trailer. This is consistent with the information included in the inspection checklist and was confirmed during the interviews. The load made by the port operator is weighed to confirm the weight of the shipment. The loads being hauled are standard loads that do not vary in weight.

**Transport Practice 1.4:**

Develop and implement a safety program for transport of cyanide.

The operation is:

- in full compliance with Transport Practice 1.4
- in substantial compliance
- not in compliance


Discuss the basis for this Finding/Deficiencies Identified:

The procedure for sodium cyanide transportation states that on receipt of the cargo, to perform verification of seal numbers in the container doors, to perform visual verification of integrity and conservation status of containers, verification of correct attachment point fastening on semi-trailer platform (maritime anchor pineapples), to visual verification of security labeling of maritime container, truck and semi-trailer.

Beagle receives cyanide as solid briquettes transported in polypropylene supersacks enclosed in polyethylene lined 1,000 kg plywood Intermediate Bulk Containers (IBCs) and in metal drums, all packed also in sealed 20 foot shipping containers. For security purposes and to maintain integrity of the packaging the shipping containers remain sealed. The seals are checked at the following designated points during transportation: on cargo receipt, at the start of transport and on arrival.

During transport the containers are secured to the trailer bed using locking clamp mechanisms that are part of the trailer. The clamps are located at fixed positions on the trailer so that the container is balanced during transport. Beagle performs pre-trip inspections to ensure that trailers are locked and secured and that placards are on all four sides of the trailers. Normal safe driving procedures and unloading procedures ensure that the truck and the trailer are not damaged during transit.

Each cyanide container is labelled to meet International Marine Dangerous Goods (IMDG) Code labelling requirements. This labelling is posted on each side of the container and includes identification of solid sodium cyanide by UN number (#1689), Class 6.1 toxic substances and the Marine Pollutant marker. Drivers conduct pre-trip vehicle safety

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checks prior to departure of the truck. These checks include confirmation that the cyanide placarding are displayed on all four sides of the vehicle.

Prior to truck departure, an inspection sheet is completed and signed by the driver prior to the vehicle leaving its base. Prior to departure of a convoy the driver and the convoy leader conduct a pre-trip inspection of the vehicle and both sign that the truck is in good operating condition. Any issues that could affect safety or the operation of the vehicle are resolved prior to departure.


Beagle has developed and implemented a preventive maintenance program for all his transport vehicles which is tracked through an Excel spreadsheet, which provide information about next maintenance date based on the kilometers traveled or the time established for each maintenance, whichever comes first, according to the truck manufacturer specifications. The system is fed by the vehicle pre-use inspections, where vehicle mileage is recorded and any needed corrective action is registered, including drivers' feedback. Preventive maintenance is performed at the authorized brand workshop.

The procedure for cyanide transportation states that drivers are contractually limited to an "on-duty" workday to 12 hours, as also required by local regulations. The procedure address that the Transport Chief will assign the drivers for cyanide transport according to the hours of rest of the drivers. The entrance of the drivers to service and their exit is controlled manually, by means of their signatures in the guardhouse of the Beagle headquarters. In occasion of the audit, cyanide transportation was being performed in local routes, demanding around 2 hours to move the cargo between origin and destination.

Beagle procedures calls for the securing of the containers to the trailer bed using the clamping mechanisms that are part of the trailer itself and also with chains, for sodium cyanide transport operation. The integrity of the clamping mechanism and the attachment point on the container is checked during a pre-trip inspection prior to the departure of the truck or the cyanide convoy to destination. Correct clamping between semitrailer and sea container is checked by the driver once at the truck scale.

It is stated in the emergency response plan that Beagle Safety Coordinator and the Convoy Leader are responsible for evaluating weather and road conditions and determining what actions should be taken. Convoy Leaders are senior personnel, experienced with weather and road conditions, and authorized to decide regarding the need to suspend a shipment or to modify any convoy plans. Regular reports are received from the Monitoring Central, including cases of civil unrest.

Before each trip, Beagle drivers must undergo alcohol testing and periodically disclose evidence of drug use and a daily report of the tests carried out is generated for the

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managers. Violation of this policy will result in the separation of the worker from the organization. Beagle maintains drug and alcohol abuse prevention policies, which were reviewed during the audit, as well of examples of daily alcohol tests. In addition, the transporter has a preventive program on alcohol and drug abuse managed by an external entity, where specialists in the field give talks to drivers regularly. Interviews with Beagle driver and guards confirmed the realization of daily alcohol tests to all personnel.

Records documenting all the above are maintained in hard copy and in electronic versions at the transporters office.

### Transport Practice 1.5:

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

The operation is:

- in full compliance with Transport Practice 1.5
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

Beagle do not ship cyanide by sea or by air. This section of the ICMC does not apply to the operation.

### Transport Practice 1.6:


Track cyanide shipments to prevent losses during transport.

The operation is:

- in full compliance with Transport Practice 1.6
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

All truck drivers and personnel involved in the cyanide transport operation are provided with cell phones with data for internet access, a WhatsApp distribution list and an Emergency Contact List to communicate between them, with the transport company, the cyanide consignor, distributor and with emergency responders. The communication group via WhatsApp application aloud to inform them any novelty or alert in the transport operation. Trucks are equipped with GPS that allows Beagle to track their units at all times at the port during loading operations, on route and on arrival to the warehouse or any other final destination of the cargo.

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Beagle's GPS are maintained by Comsatel, the GPS service provider, in coordination with the Transport Area for trucks availability. Before departure, it is required the driver to test the correct operation of the GPS's panic button. Beagle's operators from the vehicles tracking center, called the Control Tower, will report any difficulties to Comsatel. The auditor reviewed email communications between the Control Tower and Comsatel, copying communications Beagle's to Maintenance and Transport areas, as well as an Excel spreadsheet where they track the GPS operation state.

Communication blackout areas along the transport routes have been checked during routs risk assessments performed by Beagle convoy leaders. During this recertification period, sodium cyanide transport operation was performed in areas all covered by communications.

Beagle trucks are continuous monitored along the route in real time, by mean of the system called Beaglenet, and any delay will be immediately notice at the Control Tower. Communications with the base are performed upon dispatch, upon arrival at the customer sites, and after unloading is complete. The Control Tower operator, responsible for tracking cyanide shipment status in Beagle was interviewed, the GPS system was demonstrated, and logs showing that shipment status, other than cyanide, was being recorded were reviewed and were found to be complete. Beagle procedure for tracking of shipment status was reviewed during the audit and found to follow current practices.

Beagle implement inventory controls and chain of custody documentation to prevent loss of cyanide during shipment. A waybill accompanies the cargo for transportation which includes chain of custody data such as container numbers, the amount of cyanide delivered, waybill number, shipping documentation, Material Safety Data Sheets (MSDS), packing list, bill of lading, customs declarations and producer invoice, among others. This paperwork is used to document the chain of custody and is signed upon delivery of the product to the customer. The amount of cyanide delivered is carefully monitored by the driver and remotely through Beagle's office.

Documentation used at Beagle during transport include the amount of cyanide in transit from the cyanide producer and Material Safety Data Sheets, for inventory tracking and movement of cyanide. The bills of lading and shipping papers reviewed clearly indicates the number of packages and amount of cyanide transported.

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## Principle 2, Interim Storage:

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

### Transport Practice 2.1:


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

The operation is:

- in full compliance with Transport Practice 2.1
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

Beagle does not operate cyanide trans-shipping depots or interim storage sites in its transport operation. If a delivery is interrupted, loaded cyanide trucks would be stored in a secure location. The scope of this audit is for the ground transportation operations performed by Beagle trucking company from Callao Port to warehouses in Callao and to mining clients within Peru without any interim storage. Therefore, this Transport Practice does not apply to the operation.

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## Principle 3, Emergency Response

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

### Transport Practice 3.1:

Prepare detailed emergency response plans for potential cyanide releases.

The operation is:

- in full compliance
- in substantial compliance with Transport Practice 3.1
- not in compliance


Discuss the basis for this Finding/Deficiencies Identified:

Beagle has the emergency response plan PL MCS 08 Appendix N°1: Sodium Cyanide Contingency Plan. The plan includes responsibilities, communication procedures, and notification numbers for emergency responders and actions to take against cyanide emergency scenarios, among others.

During the audit it was found the plan was not appropriate for the transport operation. Contains elements that do not apply to the current operation, e.g. disposal of waste in mine, actions of first and second response, monitor HCN, among others according to annotations in the revised plan. This condition resulting in substantial compliance did not present an immediate or substantial risk to health, safety or the environment while it was being corrected as Beagle was not transporting sodium cyanide by the time of the audit. Beagle is required in the Corrective Action Plan (CAP) to develop and implement an emergency response plan to reflect actions according to the response capabilities and ongoing operations.

Also, in occasion of the audit the plan did not consider the physical and chemical form of the cyanide. After the audit Beagle sent to the auditor a modification to the plan including a description of the form of cyanide. The plan includes description of the physical and chemical form of cyanide as solid white granular cyanide and specific information regarding the hazardous material to be transported. No additional information was required to find this Protocol Question in Full Compliance.

In occasion of the audit the plan did not consider the method of transport, trucking to the final destination. After the audit Beagle sent to the auditor a modification to the plan including a description of the transport method: by trucks, only in 20 foot sea sealed sea containers, describing the trucks configuration. No additional information was required to find this Protocol Question in Full Compliance.

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Beagle’s emergency response plan consider all parts of the transport infrastructures including conditions of the roads and urban areas. The plan considers the road conditions, security issues, population density and bridges conditions, among others.

Beagle’s plan considers the trucks design of the transport vehicle in their emergency response procedures. The documents define the appropriate trucks and chassis to use to transport cyanide. The procedure indicates cyanide will be transported in shipment containers.

During the audit the reviewed plan lacked descriptions of response actions, as appropriate for the anticipated emergency situation. Throughout the plan, different response actions to the same scenario were described with no coherence, creating confusion.


This condition resulting in substantial compliance did not present an immediate or substantial risk to health, safety or the environment while it was being corrected as Beagle was not transporting sodium cyanide by the time of the audit. Beagle is required in the CAP to describe in the plan response actions that will be useful and appropriate for an emergency situation.

During the audit the reviewed plan did not identify the roles of outside responders, medical facilities or communities in emergency response procedures, although they were mentioned in the plan as to help in the emergency.

This condition resulting in substantial compliance did not present an immediate or substantial risk to health, safety or the environment while it was being corrected as Beagle was not transporting sodium cyanide by the time of the audit.

After the audit Beagle presented its Emergency Response Plan v4 where at Section 8.2 states the roles of the police, firefighters, medical centers and a private external response company for remediation. The Plan do not consider the communities participation to take their own actions in response to cyanide releases as the transporters current route is through Lima metropolitan area.

The auditor reviewed documentation in emails informing these external entities about their functions assigned in the Emergency Response Plan. No additional action was required to find this Protocol Question in Full Compliance with the Code.

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**Transport Practice 3.2:**

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

The operation is:

- in full compliance with Transport Practice 3.2
- in substantial compliance
- not in compliance

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

Beagle has provided emergency response training to all his personnel involved in the cyanide transport operation as drivers, convoy leaders, managers, convoy mechanics, maintenance shop logistics and dispatch personnel, among others. They receive an appropriate level of training to fulfill their role in emergency response. Evidence of the Staff Training and Education Program was verified which includes: first aids, road safety, firefighting basic notions in emergency situations and training in cyanide management (by external trainer).

Specific emergency response duties and responsibilities of personnel are stated in the emergency response plan, including responsibilities of the Convoy Leader and drivers.


Beagle has a complete emergency response equipment list in his emergency plan, that should be available during transport in the Convoy Leader vehicle who must inspect the medical and emergency kits prior to the departure of the convoy.

The lists includes cyanide gas detector, Tyvek suits, leather and impermeable gloves, PVC boots, safety goggles, full face masks, disposable respirators, oxygen, lime, bleach, ambú (resuscitator), area isolating tape rolls, shovels, sweeps, polyethylene bags and empty containers.

Beagle has the necessary emergency response and health and safety equipment available, including personal protective equipment during transportation.

A checklist is used to verify that the emergency equipment it is available, and it is documented in the convoy report. The Procedure establishes that the emergency kit must be inspected prior to every loading operation. The availability of this equipment was confirmed during the audit; all the equipment was available.

Beagle’s vehicle operators receive initial and periodic cyanide update training in emergency response procedures, including implementation of the emergency response plan. Vehicle operators receive refresher training in emergency response procedures every year. The auditors reviewed assistance records for emergency response training

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covering the recertification period. The auditor reviewed training records covering the recertification period.

Beagle has procedures to inspect the emergency response equipment and assure its availability when required. The operation maintains a monthly inspection program to maintain emergency response equipment in optimal condition. The auditors reviewed several inspection records covering the recertification period.

**Transport Practice 3.3:**

Develop procedures for internal and external emergency notification and reporting.

The operation is:

- in full compliance with Transport Practice 3.3
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

The Plan includes procedures and current contact information for notifying the client, the receiver, regulatory agencies and authorities from potentially affected communities of an emergency. The notification procedures, including telephone numbers, are described in the emergency response plan. It lists current emergency numbers for local hospitals, ambulance, firefighters, police and environmental responders.

Beagle emergency response plan includes internal and external emergency notification and reporting procedures The Plan states it must be updated when there are changes in the background and form, in terms of procedures, persons, telephone numbers, routes, equipment, methods, or any other consideration that allows more efficiency and effectiveness. The plan last update was been carried out and verified through the performance of a cyanide emergency mock drill in 2019.


**Transport Practice 3.4:**

Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

The operation is:

- in full compliance
- in substantial compliance with Transport Practice 3.4
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

		
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At the time of the audit remediation actions in the plan were found very general in the plan, it also describes general remediation actions that in opinion of the auditor escape the capabilities of the transport company, as rescue of cyanide containers from water courses and water bodies remediation.

This condition resulting in substantial compliance did not present an immediate or substantial risk to health, safety or the environment while it was being corrected as Beagle was not transporting sodium cyanide by the time of the audit. Beagle is required in the CAP to describe objectively and in detail the remediation actions that they reasonably will address as the first response and what actions correspond to a second response and who will carry them out after a cyanide spill.

In occasion of the audit it was not clearly stated in the plan or a procedure, the prohibition to use of chemicals, to treat cyanide released in surface water.

This condition resulting in substantial compliance did not present an immediate or substantial risk to health, safety or the environment while it was being corrected as Beagle was not transporting sodium cyanide by the time of the audit.

After the audit Beagle clarified the statement in its Emergency Response Plan v4 prohibiting the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water. No additional evidence was required to close this audit finding..

**Transport Practice 3.5:**

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


The operation is:

- in full compliance with Transport Practice 3.5
- in substantial compliance
- not in compliance


Discuss the basis for this Finding/Deficiencies Identified:

The plan states to be updated once a year. By the time of the audit it was updated, next review to be carried out in March 2020.

According to Beagle’s Annual Health and Safety Program, one cyanide emergency mock drills is scheduled on per year. The auditor reviewed Beagle drills reports for cyanide spills, finding them to be effective. In all cases scenarios simulated human exposure with the testing of the decontamination procedures. The auditors reviewed the annual cyanide mock drill reports covering the recertification period related to spills with exposure to cyanide, requiring first aids response and recovery of cyanide, finding them in compliance.

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The operation has provisions to evaluate and revise, as necessary, its emergency response plan following incidents that trigger their implementation. Although the plan was periodically updated during this certification period, no evaluations were conducted due to incidents or emergencies during this audit cycle as these events did not occur during the period, as reported by Beagle's managers.

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