



January 2013

INTERNATIONAL CYANIDE MANAGEMENT
CODE CYANIDE TRANSPORTER AUDIT

**Bolloré Africa Logistics
Sénégal Re-Certification Audit
Summary Audit Report**

Submitted to:

International Cyanide Management Institute
888 16th Street, NW - Suite 303
Washington, DC 20006
UNITED STATES OF AMERICA

SDV Sénégal
47, Avenue Hassan II (Ex Albrt
Sarraut).
Dakar
SÉNÉGAL

REPORT



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1.0 INTRODUCTION

1.1 Operational Information

Name of Transportation Facility:	Bolloré Africa Logistics Sénégal (formerly referred to as SDV Sénégal)
Name of Facility Owner:	Bolloré Africa Logistics
Name of Facility Operator:	Bolloré Africa Logistics Sénégal (formerly referred to as SDV Sénégal)
Name of Responsible Manager:	Christian Devaux, QHSE & Organisation Manager, Bolloré Africa Logistics
Address:	Bolloré Africa Logistics Tour Bolloré 31-32 Quai de Dion Bouton
State/Province:	92811 Puteaux Cedex
Country:	FRANCE
Telephone:	+33 1 46 96 48 61
Fax:	+33 1 46 96 4043
E-Mail:	devaux.christian@bollore.com

1.2 Description of Operation

1.2.1 Bolloré Africa Logistics and SDV Sénégal

The Bolloré Group was founded in 1822, and is now involved in plastic films for capacitors and packaging, electric batteries, thin papers, transportation in Africa (freight forwarding and stevedoring, railways) and international logistics, fuel distribution and dedicated terminals and systems.

The African transportation arm of the Bolloré Group is managed by Bolloré Africa Logistics which has been established for more than 50 years in 41 countries. The company has established some 200 agencies and is a key player in port activity, terrestrial transport and tailor-made logistics solutions. Bolloré Africa Logistics is actively expanding its integrated logistics network in Africa and is now the biggest transport and logistics operator in Africa.

SDV Sénégal (SDV) is a subsidiary of Bolloré Africa Logistics based in Dakar, Sénégal. SDV conducts freight forwarding, stevedoring and transportation activities within West Africa. Following an organisational restructure SDV is now referred to as Bolloré Africa Logistics Sénégal. All references to SDV throughout this audit report should be considered to refer to Bolloré Africa Logistics Sénégal.

1.2.2 Transport Consignation Sénégal

Transport Consignation Sénégal (TCS) is a Senegalese transport company that has been established and managed by SDV for the purpose of delivering hazardous cargos to destinations within Mali.

Sénégal and Mali are both member countries of CEDEAO (Communauté Economique des Etats d'Afrique de l'Ouest - West African Countries Economic Community). SDV assets are mostly foreign and as such, it is viewed as a company from a non-CEDEAO member country. As CEDEAO regulations do not allow companies from non-member countries to conduct cross boarder transport activities, SDV is not entitled to

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an international transport licence. To counter this, SDV founded TCS, a transport company with mostly Senegalese shares, in order to transport hazardous cargo between CEDEAO countries. TCS is 85% owned by SDV. TCS is managed by SDV as an integral part of SDV and employees and equipment are managed and maintained as part of the SDV Sénégal group.

1.2.3 Aices SA

Aices SA (Aices) is a Senegalese emergency response and training service provider that has been subcontracted by SDV to provide convoy escort duties, emergency response and training services for cyanide transportation.

1.2.4 Sodium Cyanide Transportation

At the time of the audit, cyanide transported by SDV originated from the AGR cyanide production facility at CSBPs Kwinana complex and at other unspecified manufacturing sites sourced by Samsung C&T Deutschland GmbH (Samsung, part of Samsung C&T Corporation). The cyanide is delivered by ship to the Port of Dakar. The cyanide is packaged in intermediate bulk containers (IBCs), which are in turn packed into a freight (shipping) container to be transported by sea to the Port of Dakar, Sénégal. A maximum of 20 IBCs are packed into a freight container with a maximum gross weight of 28 tonnes.

Prior to the arrival at Dakar, SDV ensures that the shipping documentation is in order and the goods are pre-cleared to allow prompt handling of the product through the Port. Upon arrival at the Port of Dakar, the off loading of all containers is performed by stevedoring companies. SDV collects the containers within 24 hours of arrival and transports the containers to the designated area at SDV's Transport depot where the containers are stored on the trailer in preparation for departure to the customer mine sites the following morning. At the time of the audit, these mine sites were:

- AngloGold Ashanti's Sadiola Gold Mine in Mali.
- AngloGold Ashanti's Yatela Gold Mine in Mali.
- Mineral Deposit Limited's Sabodala Gold Mine in Sénégal.
- Avion Gold Corporation's Tabakoto Gold Mine in Mali.

1.2.5 Transit Storage

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. Storage in transit occurs at the Port of Dakar for four to five days, under the control of the port, while formalities such as customs clearance and carrier releases are performed. Once formalities are complete, the cyanide containers are collected from the Port of Dakar by SDV and taken to the SDV Transport Yard where they are stored on the truck overnight in preparation for convoy departure at 0500 hrs 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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1.3 Auditors Findings and Attestation

in full compliance with

SDV Sénégal is:

in substantial compliance with

not in compliance with

The International Cyanide Management Code

This operation has not experienced compliance problems during the previous three-year audit cycle.

Audit Company: Golder Associates
Audit Team Leader: Tom Carmichael, RABQSA (14544)
Email: tomcarmichael@golder.com.au

1.4 Name and Signatures of Other Auditors:

Name	Position	Signature	Date
Tom Carmichael	Lead Auditor and Technical Specialist		3 January 2013

1.5 Dates of Audit:

The Certification Audit was undertaken within two days (2 person-days) on 24 and 25 July 2012.

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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2.0 CONSIGNOR SUMMARY

2.1 Principle 1 – Transport

The Code requires the consignor to “transport Cyanide in a manner that minimises the potential for accidents and releases”.

2.1.1 Transport Practice 1.1

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

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

SDV, through its parent company Bolloré Africa Logistics has developed and implemented a procedure to guide the selection of transport routes to minimise the potential for accidents and releases or the potential impacts of accidents and releases. SDV in consultation with its subcontractor Aices, cyanide suppliers and mining company customers, has implemented the procedure and conducted route surveys for the selected routes.

Sénégal has a designated east-west commercial route travelling from Dakar, Sénégal to the Mali boarder. This commercial route was selected at the most appropriate route to deliver cyanide to existing customers within Sénégal and to access mine sites within Mali.

Hazards identified during the route survey are risk assessed using either the Bolloré Africa Logistics Risk Evaluation Matrix or client risk assessment tools depending on customer requirements. Once risk assessed, prevention and/or protective measures are identified and implemented to make the resulting risks more acceptable.

SDV has implemented a procedure requiring annual route surveys and has a process of obtaining feedback on route conditions after each convoy.

SDV has documented measures taken to address risks identified with the selected routes within a Transport Risk Management Plan.

SDV has consulted as necessary with stakeholders and applicable governmental agencies in the selection of routes and development of cyanide management measures.

Convoys are used as a means of managing the risks of the road conditions and responding to emergencies. SDV’s Project Division Manager indicated that security is not usually a significant issue.

Cyanide is delivered in convoy over a nine month campaign each year during the dry season.

In the event of an incident, primary emergency response is coordinated by Aices using Aices and SDV personnel present with the convoy. Secondary response activities are conducted by Aices and supported by the supplier and SDV.

In the event of an incident, the duties of primary responders include immediate notification to government authorities and medical facilities (as necessary). The Mali and Sénégal public responders (police and fire brigades) do not have a direct role in incident management outside of their normal duties and SDV has consequently limited their consultation.

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SDV subcontracts Aices to undertake convoy management, emergency response and training of SDV and TCS drivers. A formal contract, signed on 27 March 2009, notes that SDV is a signatory of the ICMI code and the contractor (Aices) must comply with the Code's requirements. The contract also notes that SDV will periodically audit the contractor in order to make sure Aices complies with the Code requirements.

TCS is a transport company that has been established and managed by SDV for the purpose of delivering hazardous cargos to destinations within Mali. TCS is managed by SDV as an integral part of SDV and employees and equipment are managed and maintained as part of the SDV group.

2.1.2 Transport Practice 1.2

Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

SDV uses dedicated SDV and TCS drivers that have appropriate training and vehicle licences to transport cyanide. Mali and Sénégal are both members of CEDEAO and drivers' licences issued in Sénégal are valid other CEDEAO member countries.

Sénégal and Mali do not have any dangerous goods legislation, despite this, dangerous goods training of all cyanide drivers is provided by SDV, through Aices.

All 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. The training of cyanide handling and transport equipment operators is provided by Aices.

SDV subcontracts Aices to undertake convoy management, emergency response and training of SDV and TCS drivers. A formal contract, signed on 27 March 2009, notes that SDV is a signatory of the ICMI code and the contractor (Aices) must comply with the Code's requirements. The contract also notes that SDV will periodically audit the contractor in order to make sure Aices complies with the Code requirements.

2.1.3 Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

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SDV only uses equipment designed and maintained to operate within the cyanide loads it will be handling. Equipment consists of road vehicles (tractor – semi-trailers) that were purchased to a design specification appropriate for the cyanide transport task. Vehicle power, axle loadings and other parameters are set by the manufacturer and the loads are well within the legal capacities of the public roads.

All trailers dedicated to the cyanide delivery task are capable of carrying two fully loaded cyanide containers. No other load bearing equipment is used by SDV.

SDV has implemented an "A B C" maintenance program that is based on truck engine hours as well as a maintenance request program for breakdowns. In addition to the workshop maintenance, the Convoy Leader and drivers conduct an inspection of all prime movers and trailers prior to departure.

The Convoy Leader and drivers inspect prime movers and trailers for overloading and signs of stress prior to departure.

SDV subcontracts Aices to undertake convoy management, emergency response and training of SDV and TCS drivers. A formal contract, signed on 27 March 2009, notes that SDV is a signatory of the ICMI code and the contractor (Aices) must comply with the Code's requirements. The contract also notes that SDV will periodically audit the contractor in order to make sure Aices complies with the Code requirements.

2.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

	<input checked="" type="checkbox"/> in full compliance with	
The operation is	<input type="checkbox"/> in substantial compliance with	Transport Practice 1.4
	<input type="checkbox"/> not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

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

SDV has procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging. These comprise checks at the port, route, border crossings and checks and the mine site prior to unloading.

SDV transport cyanide for Code certified cyanide producers, who have systems in place to ensure their containers are labelled in accordance with the International Maritime Dangerous Goods (IMDG) Code and as required by local regulations or international standards. Mali and Sénégal do not have any dangerous goods legislation. As a control measure, the cyanide is trucked in convoy under the escort of persons who have received training in cyanide emergency response and dangerous goods training.

SDV has implemented a safety program for cyanide transport that includes:

- Vehicle inspections;
- Preventative maintenance;
- Limitations on operator or drivers' hours;
- Procedures to prevent loads from shifting;

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- Procedures to modify or suspend transport if conditions such as severe weather or civil unrest are encountered; and
- Drug abuse prevention.

Bolloré have adopted the International Labour Organisation SOLVE (Stress, violence, alcohol et drogue, VIH/sida, and tabagisme) training program aimed at raising awareness and managing stress violence, alcohol, drugs, HIV/Aids and tobacco. The SDV doctor is a regional trainer for the SOLVE programme.

SDV subcontracts Aices to undertake convoy management, emergency response and training of SDV and TCS drivers. A formal contract, signed on 27 March 2009, notes that SDV is a signatory of the ICMI code and the contractor (Aices) must comply with the Code's requirements. The contract also notes that SDV will periodically audit the contractor in order to make sure Aices complies with the Code requirements.

2.1.5 Transport Practice 1.5

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

in full compliance with

The operation 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 requiring the operation to follow international standards for transportation of cyanide by sea and air is NOT APPLICABLE to SDV.

SDV does not transport consignments of cyanide by sea or air within the scope of this audit. Consignments of cyanide transported by SDV arrive in Sénégal via the Port of Dakar from AGR and Samsung which are both Code certified cyanide producers. As Code certified cyanide transporters, AGR and Samsung have systems in place to ensure their containers are labelled in accordance with the International Maritime Dangerous Goods (IMDG) Code and as required by local regulations or international standards.

2.1.6 Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.6

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

All vehicles have communications systems that include two way radios, cell phones and a GPS tracking system for trucks and two way radios, cell phones and satellite phones for the escort vehicle.

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The two way radios are used for internal convoy communication. The Escort Leader uses the Satellite phone to communicate with Aices every morning and evening. Once the report has been received, Aices then email the custom mine site, SDV Transport Division and the SDV Project Manager with a convoy update.

Communication equipment is tested as part of a pre-start check to ensure it functions properly. The GPS tracking system signal is used continuously and is transmitted from each truck throughout the trip.

SDV has identified cell phone communication blackout areas along transport routes, consequently two way radios, satellite phones and GPS tracking are used as the communication methods.

The GPS tracking system continuously transmits position and other data from each truck throughout the trip. The Escort Leader uses the satellite phone to communicate with Aices every morning and evening. Once the report has been received, Aices then email the custom mine site, SDV Transport Division and the SDV Project Manager with a convoy update.

SDV implement chain of custody procedures to prevent loss of cyanide during shipment. The Escort Leader conducts inspections of the containers at the Port and at the conclusion of each break. Customs officials in Sénégal and Mali check the presence of the seals and check the seal numbers. Once delivered, a mine site representative signs a form acknowledging that the consignment was received in good condition and unopened.

Shipping papers and Material Safety Data Sheets accompany each cyanide convoy.

SDV subcontracts Aices to undertake convoy management, emergency response and training of SDV and TCS drivers. A formal contract, signed on 27 March 2009, notes that SDV is a signatory of the ICMI code and the contractor (Aices) must comply with the Code's requirements. The contract also notes that SDV will periodically audit the contractor in order to make sure Aices complies with the Code requirements.

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2.2 Principle 2 – Interim Storage

The Code requires that the consignor “**design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures**”.

2.2.1 Transport Practice 2.1

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

in full compliance with

The operation is

in substantial compliance with

Transport Practice 2.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 2.1 requiring transporters design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures is NOT APPLICABLE to SDV.

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. Storage in transit does occur at the Port of Dakar for four to five days, under the control of the port, while formalities such as customs clearance and carrier releases are performed. Once formalities are complete, the cyanide containers are collected from the Port of Dakar by SDV and taken to the SDV Transport Yard where they are stored on the truck overnight in preparation for convoy departure at 0500 hrs 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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2.3 Principle 3 – Emergency Response

The Code requires that the consignor “**Protect communities and the environment through the development of emergency response strategies and capabilities**”.

2.3.1 Transport Practice 3.1

Prepare detailed Emergency Response Plans for potential cyanide releases.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

SDV has developed detailed documents to cover emergency response for potential cyanide releases for cyanide transportation within Sénégal and Mali. The information is contained within an Emergency Response Plan and route specific Transport Management Plans.

The Transport Management Plans and Emergency Response Plan are based on road transportation between the Port of Dakar and the Sadiola, Yatela, Sabodala and Tabakoto Gold Mines. The plans are appropriate for the selected transportation routes and they consider relevant aspects of the transport infrastructure. The route evaluation process, route hazard/risk assessment process, and operational experience was used by SDV and AGR to identify three likely emergency scenarios:

- Transport incident – Vehicle Rollover caused by pulling over to stop on soft edge along a sealed road. Sea container intact with no spill or product release.
- Transport incident – Vehicle Rollover caused by crash or crash avoidance with another vehicle. Sea container intact with no spill or product release.
- Transport incident – Vehicle Rollover caused by crash or crash avoidance with another vehicle. Sea container damaged resulting in spill of product released from container.

The plans consider the physical and chemical form of cyanide and design of the transport vehicle. Storage facility emergency response plans were not developed, as cyanide is not stored at an interim storage facility between the Port of Dakar and the mine site destinations.

The Transport Management Plan and Emergency Response Plan include descriptions of response actions, as appropriate for the anticipated emergency situation. External responders identified in the documents are aware of their role in an emergency.

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2.3.2 Transport Practice 3.2

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

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

SDV is in FULL COMPLIANCE with Transport Practice 3.2 requiring that it designates appropriate response personnel and commits necessary resources for emergency response.

SDV through Aices provides emergency response training of appropriate personnel. Aices provides a four day training course (two days of theory and two days of practical) at the beginning of every convoy season, which is approximately yearly. All SDV drivers, their helpers and the Aices escort team complete this training.

Records of the annual completed training were viewed from 2010 and 2011.

The Emergency Response Plan identifies the specific emergency response duties and responsibilities of personnel for the three scenarios. Descriptions of the specific emergency response duties and responsibilities SDV Drivers and the Escort Team are detailed within the Emergency Response Plan. The cyanide training provides additional detail of the responsibilities for each of the specific roles.

SDV through Aices, as the Escort Team, maintain a list of all of the emergency response equipment that should be available during the transport route. The equipment is check prior to departure and records kept of the checks.

2.3.3 Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

SDV is in FULL COMPLIANCE with Transport Practice 3.3 requiring that it develops procedures for internal and external emergency notification and reporting.

The Emergency Response Plan contains procedures and current contact information for notifying the shipper, the receiver/consignee, outside response providers, and medical facilities of an emergency.

The Emergency Response Plan details a communication flow chart and contact numbers. A list of the same numbers is also kept by Aices in the Escort Vehicle.

Both SDV and Aices have procedures in place to ensure the numbers are kept current.

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2.3.4 Transport Practice 3.4

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

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

SDV is in FULL COMPLIANCE with Transport Practice 3.4 requiring that it develops procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

SDV has 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.

A copy of the Spill Contingency Plan is kept in each of the convoy trucks and in the escort vehicle.

The training also contains requirements for remediation depending on the spill. All SDV drivers and escort team receive this training yearly and a copy of the training information is also kept in the escort vehicle.

SDV prohibits the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water.

The Transport Management Plans (page 14) and the Emergency Response Plan (page 22) state:

When cyanide is in contact with water, it is strictly forbidden to use the following neutralising agents: sodium hypochlorite, ferrous sulphate and hydrogen peroxide.

These plans are located in the escort vehicle and the convoy trucks.

2.3.5 Transport Practice 3.5

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

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

The Transport Management Plans contain provisions for periodically reviewing and evaluating the Plan's adequacy. These reviews are being implemented.

Transport Management Plans contain provisions for conducting mock drills and they are being implemented.

Bolloré participated with Sadiola Gold Mine in Mali in a practice emergency response exercise in May 2012 including a mock traffic accident near the mine site. A report was compiled of the mock drill, including

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photographs of key activities. The findings are currently being assessed to identify whether any changes to transport practices or emergency response are required.

The Transport Management Plans and the Emergency Response Plan contains provisions for conducting a review after an incident. Bolloré Africa Logistics also has a procedure (Incident – Accident Management Procedure) requiring emergency documents to be updated after an accident. SDV has not had any incidents triggering implementation of the Emergency Response Plan.

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GOLDER ASSOCIATES PTY LTD

Tom Carmichael
ICMI Lead Auditor, Associate

TC/EWC/gf

A.B.N. 64 006 107 857

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APPENDIX A

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

solutions@golder.com
www.golder.com

Golder Associates Pty Ltd
124 Pacific Highway
St. Leonards, New South Wales 2065
Australia
T: +61 2 9478 3900

