



September 2016

## INTERNATIONAL CYANIDE MANAGEMENT CODE

# Bolloré Africa Logistics Sénégal Re-Certification Audit, Summary Audit Report

**Submitted to:**

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

Bolloré Africa Logistics  
B.P.233  
Dakar  
SÉNÉGAL

REPORT



**Report Number.** 1542476-008-R-Rev1

**Distribution:**

- 1 Copy (+1 Electronic) – International Cyanide Management Institute
- 1 Electronic Copy – Bolloré Africa Logistics
- 1 Electronic Copy – Golder Associates Pty Ltd





## Table of Contents

<b>1.0 INTRODUCTION.....</b>	<b>1</b>
1.1 Operational Information .....	1
1.2 Bolloré Africa Logistics Sénégal .....	1
1.3 Transport Consignation Sénégal .....	1
1.4 Aices SA .....	2
1.5 Snat and Tramar .....	2
1.6 Auditors Findings and Attestation .....	2
1.7 Name and Signatures of Other Auditors .....	2
1.8 Dates of Audit .....	2
<b>2.0 CONSIGNOR SUMMARY.....</b>	<b>3</b>
2.1 Principle 1 – Transport.....	3
2.1.1 Transport Practice 1.1 .....	3
2.1.2 Transport Practice 1.2.....	5
2.1.3 Transport Practice 1.3.....	6
2.1.4 Transport Practice 1.4.....	7
2.1.5 Transport Practice 1.5.....	8
2.1.6 Transport Practice 1.6.....	9
2.2 Principle 2 – Interim Storage.....	10
2.2.1 Transport Practice 2.1 .....	10
2.3 Principle 3 – Emergency Response.....	11
2.3.1 Transport Practice 3.1 .....	11
2.3.2 Transport Practice 3.2.....	12
2.3.3 Transport Practice 3.3.....	13
2.3.4 Transport Practice 3.4.....	14
2.3.5 Transport Practice 3.5.....	15
<b>3.0 IMPORTANT INFORMATION.....</b>	<b>16</b>

### APPENDICES

#### APPENDIX A

Important Information



## 1.0 INTRODUCTION

### 1.1 Operational Information

<b>Name of Transportation Facility:</b>	Bolloré Africa Logistics Sénégal
<b>Name of Facility Owner:</b>	Bolloré Africa Logistics
<b>Name of Facility Operator:</b>	Bolloré Africa Logistics Sénégal
<b>Name of Responsible Manager:</b>	Alioune COUNTA, HSE Manager Sénégal
<b>Address:</b>	B.P.233
<b>State/Province:</b>	DAKAR
<b>Country:</b>	SENEGAL
<b>Telephone:</b>	(Tel) +(221) 33 859 53 58 (Cell) +(221) 77 366 40 37
<b>Fax:</b>	None
<b>Email:</b>	Alioune.Counta@bollore.com

### 1.2 Bolloré Africa Logistics Sénégal

The Bolloré Group was founded in 1822. From its beginnings in thin papers, the Group has diversified its product ranges and services. It 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 Africa transportation arm of the Group is managed by Bolloré Africa Logistics which has been established for more than 50 years. The company is involved in port activity, terrestrial transport and logistics solutions. Bolloré Africa Logistics is one of the largest transport and logistics operator in Africa.

Bolloré Africa Logistics, Senegal conducts freight forwarding, stevedoring and transportation activities within Senegal and Mali.

### 1.3 Transport Consignation Sénégal

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

Sénégal and Mali are both member countries of CEDEAO (Communaute Economique des Etats d'Afrique de l'Ouest – West African Countries Economic Community). Bolloré assets are mostly foreign and it is viewed as a company from a non-CEDEAO member country. As such, Bolloré is not entitled to an international transport licence as CEDEAO regulations do not allow companies from non-member countries to conduct cross boarder transport activities. To counter this, Bolloré founded TCS, a transport company with mostly Senegalese shares, in order to transport hazardous cargo between CEDEAO countries. TCS is 100% owned by Bolloré. TCS is managed by Bolloré as an integral part of Bolloré and employees and equipment are managed and maintained as part of the Bolloré group.

Bolloré Africa Logistics

Name of Facility

Signature of Lead Auditor

7 September 2016

Date



### 1.4 Aices SA

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

### 1.5 Snat and Tramar

Snat and Tramar are subcontractors to Bolloré. These companies provide trucks and drivers for the transportation of cyanide.

### 1.6 Auditors Findings and Attestation

in full compliance with

**Bolloré Africa Logistics is:**  in substantial compliance with **Cyanide Management Code**  
 not in compliance with

No cyanide incidents or compliance concerns were noted as occurring during the audit period.

**Audit Company:** Golder Associates Pty Ltd  
**Audit Team Leader:** Ed Clerk, Exemplar Global (105995)  
**Email:** eclerk@golder.com.au

### 1.7 Name and Signatures of Other Auditors


Name	Position	Signature	Date
Ed Clerk	Lead Auditor and Technical Specialist		7 September 2016

### 1.8 Dates of Audit

The ICMC Certification Audit was conducted over two days between 17-18 March 2016.

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 Pre-Operational Verification Protocol for Cyanide Transportation Operations* and using standard and accepted practices for health, safety and environmental audits.

Bolloré Africa Logistics  7 September 2016  
Name of Facility Signature of Lead Auditor Date



## 2.0 CONSIGNOR SUMMARY

### 2.1 Principle 1 – Transport

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

Bolloré Africa Logistics is  in substantial compliance with

**Transport Practice 1.1**

not in compliance with

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

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

Bolloré, 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. Bolloré 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 border. 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 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.

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

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

Bolloré 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. Section 8 of the Transport Management Plan specifies the requirement that all convoys are accompanied by a security and safety escort supplied by Aices.

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 Bolloré personnel present with the convoy. Secondary response activities are conducted by Aices and supported by the supplier and Bolloré.

Bolloré Africa Logistics

Name of Facility

Signature of Lead Auditor

7 September 2016

Date



## BOLLORÉ AFRICA LOGISTICS SÉNÉGAL RE-CERTIFICATION AUDIT SUMMARY AUDIT REPORT

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 Bolloré has consequently limited their consultation.

Bolloré subcontracts Aices to undertake convoy management, emergency response and training (convoy management and dangerous goods training) of drivers. A formal contract, developed on 27 March 2009, between Bolloré and Aices was signed by the Bolloré Directeur General and Aices Administrateur Generalor. This contract was reviewed and updated on 26 July 2015 to include Morila mine.

The contract notes that Bolloré is a signatory of the ICMI code and the contractor (Aices) must comply with the Code's requirements.

Aices prepares a Mission Report during each transport convoy. The Mission Reports includes an assessment of key risks encountered during the convoy and adopted management measures. The Mission Reports are provided to Bolloré for review at the completion of each mission.

Snat and Tramar provide trucks and drivers for the transportation of cyanide. The drivers are managed within the Bolloré system to ensure appropriate training is provided and compliance with the ICMC. The vehicles are required to be maintained to Bolloré's requirements. Maintenance records are provided to Bolloré for inspection and Bolloré conduct pre-departure inspections as well to confirm the equipment meets their standards including ICMC requirements.

Bolloré Africa Logistics

Name of Facility

Signature of Lead Auditor

7 September 2016

Date



## 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

Bolloré Africa Logistics is  in substantial compliance with **Transport Practice 1.2**

not in compliance with

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

Bolloré 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.

Bolloré uses dedicated Bolloré 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 Bolloré, 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.

Bolloré subcontracts Aices to undertake convoy management, emergency response and training (convoy management and dangerous goods training) of drivers. A formal contract, developed on 27 March 2009, between Bolloré and Aices was signed by the Bolloré Directeur General and Aices Administrateur Generalor. This contract was reviewed and updated on 26 July 2015 to include Marilo mine.

The contract notes that Bolloré is a signatory of the ICMI code and the contractor (Aices) must comply with the Code's requirements.

Snat and Tramar provide trucks and drivers for the transportation of cyanide. The drivers are managed within the Bolloré system to ensure appropriate training is provided and compliance with the ICMC.

Bolloré Africa Logistics

Name of Facility

Signature of Lead Auditor

7 September 2016

Date



### 2.1.3 Transport Practice 1.3

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

in full compliance with

**Bolloré Africa Logistics is**  in substantial compliance with **Transport Practice 1.3**

not in compliance with

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

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

Bolloré 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 Bolloré.

Bolloré 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.

Bolloré subcontracts Aices to undertake convoy management, emergency response and training (convoy management and dangerous goods training) of drivers. A formal contract, developed on 27 March 2009, between Bolloré and Aices was signed by the Bolloré Directeur General and Aices Administrateur Generalor. This contract was reviewed and updated on 26 July 2015 to include Marilo mine.

The contract notes that Bolloré is a signatory of the ICMI code and the contractor (Aices) must comply with the Code’s requirements.

Snat and Tramar provide trucks and drivers for the transportation of cyanide. The drivers are managed within the Bolloré system to ensure appropriate training is provided and compliance with the ICMC.

Bolloré Africa Logistics

Name of Facility

Signature of Lead Auditor

7 September 2016

Date





## 2.1.4 Transport Practice 1.4

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

in full compliance with

**Bolloré Africa Logistics is**  in substantial compliance with

**Transport Practice 1.4**

not in compliance with

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

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

Bolloré 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.

Bolloré 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.

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

Bolloré subcontracts Aices to undertake convoy management, emergency response and training (convoy management and dangerous goods training) of drivers. A formal contract, developed on 27 March 2009, between Bolloré and Aices was signed by the Bolloré Directeur General and Aices Administrateur Generalor. This contract was reviewed and updated on 26 July 2015 to include Marilo mine.

The contract notes that Bolloré is a signatory of the ICMI code and the contractor (Aices) must comply with the Code's requirements.

Snat and Tramar provide trucks and drivers for the transportation of cyanide. The drivers are managed within the Bolloré system to ensure appropriate training is provided and compliance with the ICMC.

Bolloré Africa Logistics

Name of Facility

Signature of Lead Auditor

7 September 2016

Date



## 2.1.5 Transport Practice 1.5

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

in full compliance with

**Bolloré Africa 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 requiring the operation to follow international standards for transportation of cyanide by sea and air is NOT APPLICABLE to Bolloré.

Bolloré does not transport consignments of cyanide by sea or air within the scope of this audit.

Bolloré Africa Logistics

Name of Facility

Signature of Lead Auditor

7 September 2016

Date



**2.1.6 Transport Practice 1.6**

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

in full compliance with

**Bolloré Africa Logistics is**  in substantial compliance with

**Transport Practice 1.6**

not in compliance with

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

Bolloré 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.

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, Bolloré Transport Division and the Bolloré 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.

Bolloré 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, Bolloré Transport Division and the Bolloré Project Manager with a convoy update.

Bolloré 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.

Bolloré subcontracts Aices to undertake convoy management, emergency response and training (convoy management and dangerous goods training) of drivers. A formal contract, developed on 27 March 2009, between Bolloré and Aices was signed by the Bolloré Directeur General and Aices Administrateur Generalor. This contract was reviewed and updated on 26 July 2015 to include Marilo mine.

The contract notes that Bolloré is a signatory of the ICMI code and the contractor (Aices) must comply with the Code's requirements.

Snat and Tamar provide trucks and drivers for the transportation of cyanide. The drivers are managed within the Bolloré system to ensure appropriate training is provided and compliance with the ICMC.

Bolloré Africa Logistics

Name of Facility

Signature of Lead Auditor

7 September 2016

Date



## 2.2 Principle 2 – Interim Storage

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

Bolloré Africa 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 to Bolloré.

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 Bolloré and taken to the Bolloré Transport Yard where they are stored on the truck overnight in preparation for convoy departure early the following morning.

Bolloré Africa Logistics

Name of Facility

Signature of Lead Auditor

7 September 2016

Date



## 2.3 Principle 3 – Emergency Response

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

Bolloré Africa Logistics is  in substantial compliance with

**Transport Practice 3.1**

not in compliance with

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

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

Bolloré 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 Bolloré and AGR to identify the following likely scenarios:

- Incident during transport without spillage
- Incident during transport without spillage involving several vehicles
- Incident during transport with spillage
- Vehicle falls into a river
- Collision with a person
- Extreme weather
- Civil strife, attack on convoy

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.

Bolloré Africa Logistics

Name of Facility

Signature of Lead Auditor

7 September 2016

Date



**2.3.2 Transport Practice 3.2**

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

**in full compliance with**

**Bolloré Africa Logistics is**  in substantial compliance with **Transport Practice 3.2**

not in compliance with

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

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

Bolloré 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 Bolloré drivers, their helpers and the Aices escort team complete this training.

Records of the annual completed training were viewed.

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 Bolloré 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.

Bolloré 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.

Bolloré subcontracts Aices to undertake convoy management, emergency response and training (convoy management and dangerous goods training) of drivers. A formal contract, developed on 27 March 2009, between Bolloré and Aices was signed by the Bolloré Directeur General and Aices Administrateur Generalor. This contract was reviewed and updated on 26 July 2015 to include Marilo mine.

The contract notes that Bolloré is a signatory of the ICMI code and the contractor (Aices) must comply with the Code's requirements.

Snat and Tramar provide trucks and drivers for the transportation of cyanide. The drivers are managed within the Bolloré system to ensure appropriate training is provided and compliance with the ICMC.

Bolloré Africa Logistics

Name of Facility

Signature of Lead Auditor

7 September 2016

Date



**2.3.3 Transport Practice 3.3**

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

**in full compliance with**

**Bolloré Africa Logistics is**  in substantial compliance with **Transport Practice 3.3**

not in compliance with

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

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

Bolloré Africa Logistics

Name of Facility

Signature of Lead Auditor

7 September 2016

Date



### 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

**Bolloré Africa Logistics is**  in substantial compliance with **Transport Practice 3.4**

not in compliance with

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

Bolloré 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.

Bolloré 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.

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

Bolloré 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 Emergency Response Plan states:

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

The plan is located in the escort vehicle and the convoy trucks.

The ERP states:

*Under no circumstances will sodium hypochlorite or Ferrous Sulphate or any cyanide neutralizing chemicals be used in neutralizing cyanide that has entered surface water as this is strictly prohibited.*

Bolloré Africa Logistics

Name of Facility

Signature of Lead Auditor

7 September 2016

Date





### 2.3.5 Transport Practice 3.5

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

in full compliance with

**Bolloré Africa Logistics is**  in substantial compliance with **Transport Practice 3.5**

not in compliance with

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

Bolloré 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.

The Emergency Response Plan contains provisions for conducting Mock Drills. Additionally, the training program requires these drills to be conducted annually.

Mock drills were completed annually. A drill was completed by Aices in 2014 and by Aices and AGR in 2015. The drills involved an accident where cyanide was spilt and people injured.

A report was compiled of the mock drill, including photographs of key activities.

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. Bolloré has not had any incidents triggering implementation of the Emergency Response Plan.

Bolloré Africa Logistics

Name of Facility

Signature of Lead Auditor

7 September 2016

Date



### 3.0 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.

Bolloré Africa Logistics

Name of Facility

Signature of Lead Auditor

7 September 2016

Date



## Report Signature Page

**GOLDER ASSOCIATES PTY LTD**

A handwritten signature in black ink, appearing to read 'Ed Clerk', written over a light blue grid background.

Ed Clerk  
ICMC Lead Auditor and ICMC Transportation Expert

JEJ/EWC/hsl

A.B.N. 64 006 107 857

Golder, Golder Associates and the GA globe design are trademarks of Golder Associates Corporation.

j:\env\2015 - environment\1542476 - bolloré audits west africa\correspondence out\008 senegal sdv sar\1542476-008-r-rev1 sar bolloré africa logistics - sdv.docx



# **APPENDIX A**

## **Important Information**



## IMPORTANT INFORMATION RELATING TO THIS REPORT

The document (“Report”) to which this page is attached and which this page forms a part of, has been issued by Golder Associates Pty Ltd (“Golder”) subject to the important limitations and other qualifications set out below.

This Report constitutes or is part of services (“Services”) provided by Golder to its client (“Client”) under and subject to a contract between Golder and its Client (“Contract”). The contents of this page are not intended to and do not alter Golder’s obligations (including any limits on those obligations) to its Client under the Contract.

This Report is provided for use solely by Golder’s Client and persons acting on the Client’s behalf, such as its professional advisers. Golder is responsible only to its Client for this Report. Golder has no responsibility to any other person who relies or makes decisions based upon this Report or who makes any other use of this Report. Golder accepts no responsibility for any loss or damage suffered by any person other than its Client as a result of any reliance upon any part of this Report, decisions made based upon this Report or any other use of it.

This Report has been prepared in the context of the circumstances and purposes referred to in, or derived from, the Contract and Golder accepts no responsibility for use of the Report, in whole or in part, in any other context or circumstance or for any other purpose.

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.**

At Golder Associates we strive to be the most respected global company providing consulting, design, and construction services in earth, environment, and related areas of energy. Employee owned since our formation in 1960, our focus, unique culture and operating environment offer opportunities and the freedom to excel, which attracts the leading specialists in our fields. Golder professionals take the time to build an understanding of client needs and of the specific environments in which they operate. We continue to expand our technical capabilities and have experienced steady growth with employees who operate from offices located throughout Africa, Asia, Australasia, Europe, North America, and South America.

Africa	+ 27 11 254 4800
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](mailto:solutions@golder.com)  
[www.golder.com](http://www.golder.com)

**Golder Associates Pty Ltd**  
**Level 3, 1 Havelock Street**  
**West Perth, Western Australia 6005**  
**Australia**  
**T: +61 8 9213 7600**

