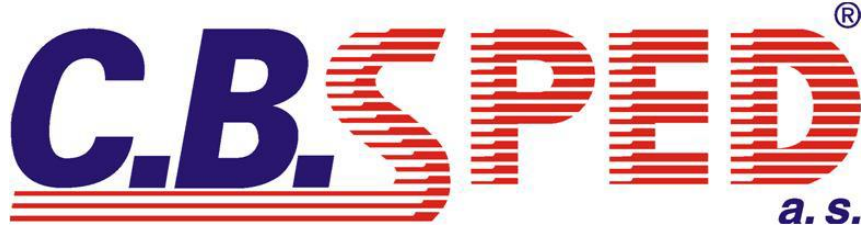

**ICMI Cyanide Code Transportation
Summary Certification Audit Report**



**Ceske Budejovice
Czech Republic**

**Submitted to:
International Cyanide Management Institute
1400 I Street, NW – Suite 550
Washington, DC 20005
USA**

2019 Audit Cycle



www.cnauditing.com

Company Information:

Name of Operation Audited: C.B. SPED a.s.
David Uhlir
Name and contact information for C.B. SPED: J.S. Baara 80
370 21 Ceske Budejovice
Czech Republic
Contact: Email: duhlir@cbsped.cz

Location detail and description of operation:


C.B. SPED was established in 1997 is a located in Ceske Budejovice, a city located approximately two hours south of Prague, in the Czech Republic. C.B. SPED is a full-service trucking and 3rd-Party Logistics (3PL) Provider. The company continues to maintain its ISO 9001 (Quality of Service) and ISO 14001 (Environmental Management) certification. C.B. SPED has been transporting cyanide throughout Europe since 2000. C.B. SPED primarily delivers cyanide for the ICMC (International Cyanide Management Code) certified supplier LZ Draslovka a.s. Kolin (Draslovka). At the time of the audit cyanide deliveries were being made to multiple customer and customer/consignor warehouses in Europe. C.B. SPED maintains its Code Signatory status and ICMC certification as part of its contractual agreement with Draslovka so that cyanide from this producer is always shipped using an ICMC-certified transporter.

At the time of the audit, cyanide was being transported in semi-bulk bag-in-box packaging and in drums using enclosed trailers. The shipments originate in the Czech Republic and are bound for European customers and international destinations.

Neither C.B. SPED nor its sub-contractors have experienced any cyanide incidents at any time, before or since the initial ICMC certification in 2012.

The ICMI-approved Lead/Transportation Technical Auditor verified that C.B. SPED operations are in FULL COMPLIANCE with ICMC requirements for transporters.

C.B. SPED a.s.
Name of Operation


Signature of Lead Auditor
www.cnauditing.com
Page 2 of 13

November 7-8, 2019
Date



Auditor's Finding

This operation is

- in full compliance
- in substantial compliance *(see below)
- not in compliance

with the International Cyanide Management Code.

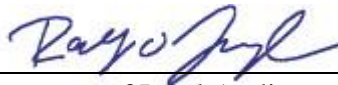
The operation has not experienced any cyanide spills or releases since its original certification audit in 2012.

Audit Company:	CN Auditing Group www.cnauditing.com
Lead / Technical Auditor:	Ralf Jurczyk E-mail: rj@cnauditing.com
Date(s) of Audit:	November 7-8, 2019

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.

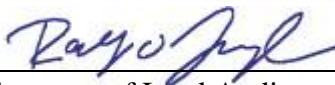
I attest that this Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

C.B. SPED a.s.
Name of Operation


Signature of Lead Auditor

January 31, 2020
Date

C.B. SPED a.s.
Name of Operation


Signature of Lead Auditor
www.cnauditing.com
Page 3 of 13

November 7-8, 2019
Date

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
 in substantial compliance with Transport Practice 1.1
 not in compliance with

Summarize the basis for this Finding:

C.B. SPED is in Full Compliance with Transport Practice 1.1 that requires that cyanide transport routes be selected in a way that minimizes the potential for accidents and releases.

C.B. SPED follows the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR) regulations. C.B. SPED and its sub-contracted carriers have ADR Specialists who are responsible for ensuring that all ADR requirements are fulfilled and that the planning for the safe transport of shipments is appropriately completed.


Considerations such as population density, infrastructure (specifically tunnels), pitch and grade of roads, the proximity of the transport route to water bodies, and route security are considered during the planning process. Interviews were conducted with Drivers, Dispatchers, and an ADR Transportation Expert. Awareness of the need for having a designated route and transportation security plan was very good. Routing considerations were found to be consistent with those required by the Code.

The only roads that are used for transport are formally designated by the European Union as being acceptable roads for the transport of Dangerous Goods. According to interviews, one risk mitigation measure employed by drivers is the use of truck stops that have been specifically designated as being appropriate resting areas for drivers transporting Dangerous Goods.

According to interviews, driver feedback is obtained during each delivery through the dispatch operation. Routes are also re-evaluated each year. Any problems or issues from the previous year and any changes to allowable truck stops and routes are taken into consideration during this review. Records for the re-certification period were available for review. Route planning information reviewed during the audit was most recently reviewed in 2019.

Risk mitigation measures to be taken by drivers are documented in the route-specific transportation security plans. The routes traveled through Europe are generally considered safe. The driver is required to have the transportation security plan available at all times during the transport. This

C.B. SPED a.s.
Name of Operation


Signature of Lead Auditor

November 7-8, 2019
Date

practice was confirmed through interviews with the drivers and an evaluation of the paperwork that was available in the truck at the time of transport.

According to interviews with drivers, dispatchers, and an ADR Transportation Expert, acceptable Dangerous Goods routes and truck stops are designated by each country in the European Union. This information is referenced by C.B. SPED during the designation of acceptable routes. Additionally, only Dangerous Goods routes allowed by the governments through which the load is transported are used, which ensures adherence to local requirements regarding dangerous goods. No parts of the routes present special or additional security concerns.

Interviews were held with C.B. SPED Management to confirm that the cyanide producer and C.B. SPED interact with local emergency responders and hospitals and that these responders and medical facilities understand their roles in an emergency response. The cyanide producer is ICMC-certified and been found to be compliant with ICMC requirements.


The European infrastructure for managing emergency situations is very mature. According to European law, the managing of emergency transportation situations is the responsibility of the Competent Emergency Authorities in each country. These Competent Emergency Authorities are supported by an extensive emergency response network of companies and responders known as ICE (International Chemical Environment). This European emergency response network of national programs has been chartered to provide information, advice, and emergency response resources to respond to transportation emergencies.

C.B. SPED does use sub-contract trucking companies for the transport of cyanide. Procedures and contractual agreements are in place to ensure that subcontract trucking operations fulfill all ICMC requirements. C.B. SPED maintains a formal list of approved cyanide transporters who have been evaluated by C.B. SPED management and the C.B. SPED ADR Specialist for their ability to transport cyanide in a manner that fulfills all ICMC requirements. At the time of the audit, three companies had been evaluated by C.B. SPED and were being used for the transport of sodium cyanide between the Czech Republic and European destinations. Relevant qualification information and contracts were evaluated for each of these sub-contractor companies during the audit. Sub-contractor driver interviews were held, and trucking equipment observed.

All personnel interviewed demonstrated good awareness of ICMC requirements. All equipment was found to be in excellent working order. The loading process at the ICMC-certified cyanide producer, Lucebni zavody Draslovka a.s. (Draslovka) in Kolin, Czech Republic was included in the audit.

Procedures and contractual agreements are in place to ensure that subcontract trucking operations fulfill all ICMC requirements. Signed ICMC-related agreements, transportation orders (contracts) with ICMC requirements stated in them, records of communications between C.B. SPED and its

C.B. SPED a.s.
Name of Operation


Signature of Lead Auditor
www.cnauditing.com
Page 5 of 13

November 7-8, 2019
Date

subcontract transportation partners, and legal authorizations were confirmed during the audit. Additional sub-contractor controls include sub-contractor inspections done by C.B. SPED periodically and the inclusion of sub-contractors in the ICMC audit process. Records were available to demonstrate that sub-contractor controls are in place.

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
 in substantial compliance with Transport Practice 1.2
 not in compliance with

Summarize the basis for this Finding:


C.B. SPED is in Full Compliance with Transport Practice 1.2 that requires that personnel operating cyanide handling and transport equipment be able to perform their jobs with minimum risk to communities and the environment.

C.B. SPED uses only trained, qualified and licensed drivers and sub-contract drivers. The transport of Dangerous Goods is performed in accordance with the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR) regulations. These regulations require that drivers transporting Dangerous Goods undergo specific training, become authorized specifically for the hazard class that is being transported (6.1 for cyanide) and that the drivers receive periodic health examinations.

Training and driver qualification records were reviewed and were found to be acceptable. Drivers are trained by an external training organization (DEKRA) that is authorized to provide governmentally required Dangerous Goods training. The training is designed to train drivers to perform their jobs in a manner that minimizes the potential for chemical releases and exposures. According to interviews with the C.B. SPED Training Coordinator, drivers who transport cyanide are trained every five years, in accordance with ADR regulations.

C.B. SPED does use sub-contract trucking companies for the transport of cyanide. Procedures and contractual agreements are in place to ensure that sub-contract trucking operations fulfill all ICMC requirements. Signed ICMC-related agreements, transportation orders (contracts) with ICMC

C.B. SPED a.s.
 Name of Operation


 Signature of Lead Auditor

November 7-8, 2019
 Date


requirements stated in them, records of communications between C.B. SPED and its subcontract transportation partners, and legal authorizations were confirmed during the audit.

Additionally, a representative from Draslovka (cyanide producer / shipper) was interviewed during the audit. Confirmation was made that driver license qualifications are checked as part of the dispatch process when the cargo is picked up from the producer.

Contracted cyanide drivers interviewed during the audit showed excellent awareness and were able to demonstrate that all above-mentioned C.B. SPED (and ADR) requirements have been fulfilled. Driver credentials were confirmed during the audit and were found to be in order.

Signed ICMC-related agreements, formal procedures that are part of the company's ISO 14001/9001 management system, transportation orders (contracts) with ICMC requirements stated in them, records of communications between C.B. SPED and its subcontract transportation partners, legal authorizations, shipping paperwork showing chain of custody requirements being met, shipping weight information, placarding practices, subcontractor driver awareness, and subcontractor equipment suitability were evaluated during the audit. In addition, drivers, dispatchers, and management personnel were randomly sampled during the audit and interviewed and/or observed in daily operations. All paperwork, records, and activities reviewed during the audit were found to be ICMC compliant.

C.B. SPED a.s.
Name of Operation


Signature of Lead Auditor
www.cnauditing.com

November 7-8, 2019
Date

Transport Practice 1.3: *Ensure that transport equipment is suitable for the cyanide shipment.*

The operation is in full compliance with
 in substantial compliance with Transport Practice 1.3
 not in compliance with

Summarize the basis for this Finding:

C.B. SPED is in Full Compliance with Transport Practice 1.3 that requires that transport equipment be suitable for cyanide shipments.

C.B. SPED uses tractor trucks and trailers to transport solid sodium cyanide. Equipment files were reviewed and specifications for the tractor trucks and trailers were reviewed specifically for weight capacity. The weights of shipments on Bills of Lading (BOL) shipping paperwork were compared to equipment design specifications. The equipment used by C.B. SPED is capable of operating at loads greater than the heaviest shipment reviewed. Interviews and a review of ADR regulations confirmed that only specially equipped tractors and trailers are allowed to be used for the transport of Dangerous Goods.


Since shipments cross borders between countries, inspections for weight, maintenance of equipment and shipping documentation was evident for most shipments reviewed. No issues were found.

Interviews and a review of ADR regulations confirmed that vehicles and equipment must be regularly maintained and inspected as part of the ADR equipment permitting process.

Trailers are loaded by Draslovka, an ICMC certified signatory cyanide producer. Trucking personnel are responsible for ensuring that the trailers are evenly loaded and that all containers are properly blocked and braced. The trucks used to transport the cyanide are heavy-duty commercial tractors pulling trailers that are capable of handling loads that are significantly heavier than these standard-weight shipments. ADR (European Transportation) regulations require that equipment that is authorized for the transport of hazardous materials meet fitness for duty requirements and that it be properly maintained and inspected. Authorities inspect equipment and confirm valid equipment certifications and proper loading practices commonly during road-side inspections throughout Europe.

An extensive review was conducted during the audit of shipping papers from the sub-contracted companies. This review of shipping weights and number of packages confirmed that loads are

C.B. SPED a.s.
Name of Operation


Signature of Lead Auditor

November 7-8, 2019
Date

always standard weights that have been predetermined by the shipper as being within equipment capability and legal road weight limits.

Transport Practice 1.4: Develop and implement a safety program for transport of cyanide.

The operation is in full compliance with
 in substantial compliance with Transport Practice 1.4
 not in compliance with

Summarize the basis for this Finding:

C.B. SPED is in Full Compliance with Transport 1.4 that requires the development and implementation of a safety program for the transport of cyanide.

Cyanide packages are loaded into C.B. SPED trailers by the shipper. C.B. SPED drivers / sub-contracted drivers block, strap, and brace the loads and confirm that the load has been properly secured prior to leaving the shipping facility. This loading activity was observed during the audit. Appropriate placards are displayed on the trucks. According to interviews with the cyanide producer and the drivers, the proper use of placards is confirmed during the pre-trip inspections.


According to driver interviews, pre-trip inspections are conducted prior to each departure. Additionally, interviews with a contracted driver and the cyanide producer also confirmed that trucks are visually inspected prior to each movement. Vehicles used for transportation of Dangerous Goods in Europe must meet certain technical specifications and must be regularly maintained. ADR vehicle technical certificates are issued for each piece of equipment (tractors and trailers). The vehicle certificates are renewed annually. C.B. SPED equipment is maintained regularly; maintenance records were found to be acceptable.

The Safety Program includes limitations on drivers' hours in accordance with ADR regulations. Driver's hours are logged and are monitored to ensure regulatory compliance and adherence to company policy.

Cyanide packages are loaded by the shipper. According to documented Safety Instructions, and interviews with Drivers, C.B. SPED drivers must confirm that the load has been properly secured after the cargo has been loaded.

Drivers are empowered and directed to pull over whenever weather, fatigue or other conditions are unsafe to continue the trip. The Security / Route Plan designates which truck stops are acceptable for stopping and resting during the transport. According to interviews, the drivers maintain close

C.B. SPED a.s.
Name of Operation



Signature of Lead Auditor
www.cnauditing.com
Page 9 of 13

November 7-8, 2019
Date

communication with the dispatcher and personnel at the point of delivery. If upset conditions arise, the driver would call the dispatcher to inform him or her of the situation.

Procedures and contractual agreements are in place to ensure that subcontract trucking operations fulfill all ICMC requirements. Signed ICMC-related agreements, transportation orders (contracts) with ICMC requirements stated in them, records of communications between C.B. SPED and its subcontract transportation partners, and legal authorizations were confirmed during the audit. Contractor equipment and contractor driver awareness were evaluated as part of this audit and were found to be acceptable.

Transport Practice 1.5: Follow international standards for transportation of cyanide by sea and air.

The operation is in full compliance with
 in substantial compliance with Transport Practice 1.5
 not in compliance with

Summarize the basis for this Finding:

C.B. SPED is in Full Compliance with Transport Practice 1.5 requiring that international standards for transportation of cyanide by sea and air be followed.

C.B. SPED does not ship cyanide by sea or by air.

Transport Practice 1.6: Track cyanide shipments to prevent losses during transport.


The operation is in full compliance with
 in substantial compliance with Transport Practice 1.6
 not in compliance with

Summarize the basis for this Finding:

C.B. SPED is in Full Compliance with Transport Practice 1.6 that requires the tracking of cyanide shipments to prevent losses during transport.

C.B. SPED uses GPS and communication systems to ensure that drivers are always able to communicate with dispatch personnel and others, as necessary. According to interviews, communication system function is confirmed during the pre-trip inspection process. In addition

C.B. SPED a.s.
Name of Operation


Signature of Lead Auditor

November 7-8, 2019
Date

to GPS tracking, drivers update dispatch personnel at defined frequencies to inform them of shipment status. Dispatch activities and communications were observed over the course of the audit. Dispatchers demonstrated that they had a very detailed understanding of shipment status and cargo location.

The communication/tracking equipment (cell phones and GPS Tracking) is in daily use. The proper functioning of equipment is checked during the driver pre-trip inspections. Blackout areas do not present a problem on the routes traveled.


Drivers have shipping documentation including the Bill of Lading with them at all times during a shipment. Bills of Lading were reviewed for cyanide shipments made during the re-certification period. Information regarding the type of material transported, the type of container, the number of packages, and the weight of the shipment is consistently entered onto the Bill of Lading by the shipper. Drivers carry Safety Data Sheets with them during deliveries. This practice was confirmed through interview.

Trailers are sealed upon loading and are not opened by C.B. SPED. Shipping paperwork was reviewed and the seal numbers on containers and the weight of the shipment are confirmed at the point of transfer of custody. Shipping paperwork was found to be conformant to Code requirements, including chain of custody requirements.

C.B. SPED does use sub-contract trucking companies for the transport of cyanide. Procedures and contractual agreements are in place to ensure that sub-contract trucking operations fulfill all ICMC requirements. C.B. SPED maintains a formal list of approved cyanide transporters who have been evaluated by C.B. SPED management and the C.B. SPED ADR Specialist for their ability to transport cyanide in a manner that fulfills all ICMC requirements. At the time of the audit, three companies had been evaluated by C.B. SPED and were being used for the transport of sodium cyanide between the Czech Republic and European destinations. Relevant qualification information and contracts were evaluated for each of these sub-contractor companies during the audit.

Signed ICMC-related agreements, formal procedures that are part of the company's ISO 14001/9001 management system, transportation orders (contracts) with ICMC requirements stated in them, records of communications between C.B. SPED and its subcontract transportation partners, legal authorizations, shipping paperwork showing chain of custody requirements being met, shipping weight information, placarding practices, subcontractor driver awareness, and subcontractor equipment suitability were evaluated during the audit. In addition, drivers, dispatchers, and management personnel were randomly sampled during the audit and interviewed and/or observed in daily operations.

C.B. SPED a.s.
Name of Operation


Signature of Lead Auditor
www.cnauditing.com
Page 11 of 13

November 7-8, 2019
Date

An extensive review was conducted during the audit of shipping papers from a wide range of sub-contracted companies. This review of shipping weights and number of packages (chain of custody) confirmed that loads are always standard weights that have been predetermined by the shipper as being within equipment capability and legal road weight limits.

Dispatching of subcontracted drivers and equipment was including in the audit. Activities and records were found to be acceptable.

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
 in substantial compliance with Transport Practice 2.1
 not in compliance with

Summarize the basis for this Finding:

C.B. SPED is in Full Compliance with Transport Practice 2.1 that requires the trans-shipping depots and interim storage sites be designed, constructed, and operated in a way that prevents releases and exposures.


C.B. SPED does not have any cyanide interim storage responsibilities. At the time of the audit C.B. SPED was not storing any cyanide. Cargo was being transported directly from the Cyanide Producer to customers and to customer or consignor warehouses in Europe. C.B. SPED reported that they have not stored cyanide since the beginning of this operation prior to the certification audit in 2012.

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.*

in full compliance with

C.B. SPED a.s.
Name of Operation


Signature of Lead Auditor
www.cnauditing.com
Page 12 of 13

November 7-8, 2019
Date

The operation is in substantial compliance with Transport Practice 3.1
 not in compliance with

Summarize the basis for this Finding:

C.B. SPED is in Full Compliance with Transport Practice 3.1 that requires that detailed emergency response plans for potential cyanide releases.

C.B. SPED has documented emergency response procedures for transportation accidents. Emergency preparedness documents were first developed in 2012 and were most recently updated in 2019. These documents were evaluated by the auditor. The information was found to be appropriately detailed. C.B. SPED drivers have emergency response procedures, the Safety Data Sheet, the security plan, and emergency telephone numbers with them during all deliveries. In addition to the emergency response procedures, emergency response information is included in the security plan.

The emergency response procedures do not refer to the design of the transport vehicle, but C.B. SPED only transports solid sodium cyanide by truck. The ERP is appropriate for the equipment and types of cargo and was found to be acceptable.

C.B. SPED only transports cyanide via truck and all scenarios considered in the emergency planning documents were related to truck accidents or small cyanide spills from packaging. Solid sodium cyanide (the only physical form transported), roadway infrastructure differences, and the detailed roles of emergency responders are discussed in the planning information. This information was reviewed for the different countries through which the load was transported. The information was found to be appropriately detailed for the operation.


Transport Practice 3.2: *Designate appropriate response personnel and commit necessary resources for emergency response.*

The operation is in full compliance with
 in substantial compliance with Transport Practice 3.2
 not in compliance with

Summarize the basis for this Finding:

C.B. SPED is in Full Compliance with the Transport Practice 3.2 that requires that appropriate response personnel have been designated and necessary resources have been committed for emergency response.

C.B. SPED a.s.
Name of Operation


Signature of Lead Auditor
www.cnauditing.com
Page 13 of 13

November 7-8, 2019
Date

All drivers receive emergency response training through a government-approved Dangerous Goods training program every five years. This training is required as part of the license renewal process and includes hands-on emergency response training. Additionally, C.B. SPED personnel (dispatchers and office personnel) are trained and refreshed on company emergency procedures periodically. The information in the emergency and security plans was reviewed and was found to be appropriately detailed.


The emergency response procedures and the security plans explain that the C.B. SPED drivers are to secure the scene by blocking public access to the accident scene and make notifications in the event of an emergency situation. The universal emergency response number to be used for a crash is 112. This number can be dialed in the European Union free of charge from any telephone or any mobile phone in order to reach emergency services. In addition to the 112-emergency number, the driver is to contact the transportation emergency response network ICE. The emergency numbers outlined in the emergency documentation are for TRINS in the Czech Republic, TUIS in Germany, and Belintra in Belgium. Each sub-contractor is required by ADR regulations to plan the route and emergency response information specifically for each delivery of hazardous goods. Drivers are required to have this in the truck during deliveries.

European ADR regulations define what emergency response equipment must in a truck at all times during the transport of Dangerous Goods. Emergency equipment maintained on a cyanide shipment truck that was evaluated during the audit and was found to be in excellent condition and was found to be suitable for the type of transport and road conditions. Driver awareness of the need to regularly inspect the equipment as part of the pre-trip inspection process and have it available at all times was excellent. Additionally, the driver indicated that government authorities check for this equipment during routine truck stops and inspections. Dispatching of subcontracted drivers and equipment was including in the audit. Activities and records were found to be acceptable.

All drivers receive emergency response training through a government-approved Dangerous Goods training program every five years. This training is required as part of the license renewal process and includes hands-on emergency response training. Additionally, C.B. SPED personnel (dispatchers and office personnel) are trained and refreshed on company emergency procedures periodically. The most recent training was provided on 1/2/2020.

C.B. SPED does use sub-contract trucking companies for the transport of cyanide. Contracts and emergency procedures clearly delineate the roles and responsibilities of the sub-contractor during emergency response. Procedures and contractual agreements are in place to ensure that sub-contract trucking operations fulfill all ICMC requirements. C.B. SPED maintains a formal list of approved cyanide transporters who have been evaluated by C.B. SPED management and the C.B. SPED ADR Specialist for their ability to transport cyanide in a manner that fulfills all ICMC requirements. At the time of the audit, three companies had been evaluated by C.B. SPED

C.B. SPED a.s.
Name of Operation


Signature of Lead Auditor
www.cnauditing.com
Page 14 of 13

November 7-8, 2019
Date

and were being used for the transport of sodium cyanide between the Czech Republic and European destinations. Relevant qualification information and contracts were evaluated for each of these sub-contractor companies during the audit.

Transport Practice 3.3: *Develop procedures for internal and external emergency notification and reporting.*

The operation is in full compliance with in substantial compliance with not in compliance with Transport Practice 3.3

Summarize the basis for this Finding:

C.B. SPED is in Full Compliance with Transport Practice 3.3 that requires the development of procedures for internal and external emergency notification and reporting.

The notification procedures, including current telephone numbers, are described in the route-specific transportation security plan that is carried by drivers at all times. The documents were reviewed during the audit and found to be appropriately detailed. According to interviews the Security Plans are reviewed at least annually and are updated as necessary. Office personnel reference the emergency response procedures, which are also updated at least annually and were found to have up-to-date notification information for notifying the shipper, receiver, regulatory agencies, outside responders, and medical facilities. Potentially affected communities would be notified by authorities.


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

Summarize the basis for this Finding:

C.B. SPED is in Full Compliance with Transport Practice 3.4. C.B. SPED does not remediate spilled materials and the details regarding the use of cyanide treatment chemicals is not discussed in the emergency plan. This is managed by the authorities and professional emergency response

C.B. SPED a.s.
Name of Operation


Signature of Lead Auditor

November 7-8, 2019
Date

companies in Europe. According to interviews, the cyanide producer or consignor would coordinate the remediation response. This explanation was accepted by the auditor.

Transport Practice 3.5: Periodically evaluate response procedures and capabilities and revise them as needed.


The operation is in full compliance with
 in substantial compliance with Transport Practice 3.5
 not in compliance with

Summarize the basis for this Finding:

C.B. SPED is in Full Compliance with Transport Practice 3.5 that requires that response procedures and capabilities be periodically evaluated and revised, as needed.

The emergency procedures are reviewed as necessary, and contact information is reviewed at least annually. All documentation reviewed as part of this evaluation was updated in 2019. The emergency plan states that an emergency drill is conducted at least once every three years. Records were available to show that a drill was conducted in 2019. Emergency response drills were reviewed for performance and the need to change the emergency plans. No actions were identified as being necessary.

C.B. SPED a.s.
Name of Operation



Signature of Lead Auditor
www.cnauditing.com
Page 16 of 13

November 7-8, 2019
Date