

FINAL
SUMMARY AUDIT REPORT

for

CSTT-AO Group
Compagnie Sénégalaise de Transport Transatlantique
West Africa

Audit Dates:

- October 9 to 12- 2012 (on-site)
- January 7 to 11-2013 (on-site)
- January 22 to 25-2013 (off-site)

Audit team: Guy Auclair; ICMI-Lead Auditor & Technical Expert for Hazardous
Materials Transportation



Montreal, Canada
January 2013

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Name of Cyanide Transportation Facility: CSTT-AO-GROUP

Name of Facility Owner: CSTT-AO Group

Name of Facility Operator: CSTT-AO- Group

Name of Responsible Manager: Mr. Mamadou Lamine Gueye

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State/Province: Dakar

Country: Senegal

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Location detail and description of operations:

Private Group operating for almost 65 years, CSTT-AO is a pioneer on the continent and especially in West Africa, of logistic services offering to Mines and Industries.

Started in 1949 in Senegal CSTT-AO has grown, through subsidiaries, from West Africa: (Afrilog Mali, Afrilog Côte d'Ivoire, Afrilog Ghana, Afrilog Guinea), to East Africa (Afrilog Mozambique) via Central Africa (Afrilog Congo).

Designing, implementing and operating integrated logistics solutions for heavy industries and mining projects, CSTT-AO Group offers:

- Transportation of Hazardous classified goods as cyanide, hydrogen peroxide, lead nitrate. In 2011 CSTT-AO has delivered by road 8000 tons of cyanide (400 containers).
- Transportation of Oversized Cargo (Grinding Mills, Mill motors, Dump trucks...), containers, bulk cargo....
- Sourcing and procurement of raw material, reagents, spare parts and consumables.
- Warehousing and distribution
- Freight forwarding, Stevedoring, Clearing Air and Sea.

Certified ISO 9001-2008 for 2 years now, CSTT-AO has developed and implemented standardized processes in all its functions and across its complete logistic chain services. Recently CSTT-AO has taken the ISO 14001 environmental step.

By mastering information, physical and finance flows – using SAP as its ERP – CSTT-AO is able to offer tailor made and reliable solutions contributing therefore to add value to its clients operations.

With own trucks and low beds fleets, warehouses and laydown areas CSTT-AO has a competitive advantages in benefiting of better flexibility in the conduct of operations.

Teams of trade and logistic experts, dedicated to clients, develop permanently solutions aligned on CSTT-AO Group's values: Commitment – Ownership – Professionalism and Innovation.

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Permanently reviewing its environment and market segment, to analyze trends and anticipate clients' needs, the CSTT-AO Group has launch a densification of its logistic network (through subsidiaries and partnerships) and a reinforcement of his operational capabilities (by increase of trucks fleets and warehousing infrastructure) to make a reality its vision to be the leading integrated logistic provider in Africa.

Auditor's finding

This operation is

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

with the International Cyanide Management Code.

Audit Company: *Environmental & Safety Counselor Firm GA*

Audit Team Leader: Guy Auclair., IRCA-ICMI-TSM-ECO Certified Lead Auditor & Technical expert for hazardous materials transportation.

E-mail: ceauclair@videotron.ca

Names and Signatures of Other Auditors: No additional auditor assigned for this transporter.

Date(s) of Audit: January 7 to 11-2013

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 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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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/Deficiencies Identified:

Sodium cyanide transportation is provided by roads and routes previously defined under assessment and selection. Whenever possible the urban areas or high density are avoided.

Products shall not be carried during rain seasons (June to late September), except in accordance with procedures and clearly defined.

Critical risks are mainly determined but not limited to:

- Weather conditions (wind exceptionally heavy rains, floods,)
- State of infrastructure (roads, bridges and completely impractical roads)
- Social factors: large crowds of people on the road (Magal, Gamou, Events, disturbing public order, etc.

The reports are forwarded to the team leader before each departure of the convoy. It also take the opportunity to make contact with the administrative authorities (Police officers, fire-fighters, sub-prefecture,) located along the way.


- Fleet management procedure preventive and corrective # PO02 SP04 PCSN 08
- Emergency preparedness and response plan # PO02 SP04 PCSN 06 A
- Route and road updated assessments reporting # PO02 SP04 PCSN03 E 01
- Trucks and trailers verification check list # PO02 SP04 PCSN06 E05
- Escort vehicle instruction check list # PO02 SP04 PCSN05 E06/A

There were several procedures to determine, select, assess proper and acceptable and available route selected par the selected and assessor team which include client (mine site destination) of sodium cyanide delivery. The road recognition criteria team include on a regular basis, client security responsible, convoy security manager and when existent local municipal or village authorities.

Safety assessment procedure indicates how and decisional level for risk assessment results had predetermined appropriate routes. External communication procedure # PO02 SP04 PCSN07 involved clients convoy destination for validating all criteria particularly bridges, small communities, security social concerns or issues. Sodium cyanide delivery use only trucks and trailers only on various types of road and routes. In West Africa, roads are in gravel with no asphalt pavements. Provincial routes are built gravel with asphalt pavements. A maintenances

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program is under the local country responsibilities. Bridges and railroad are included in the maintenance program. Overall route assessment take into account in the matrix assessment sheet the quality, the condition and capacity of loading.

Local routes are in asphalt and mine site roads in gravel and top soil sand. Securities of mine site communicate and participate with the evaluation team with the selection of acceptable or not acceptable route and road.

Critical risk identified are listed but limited to:

- Climatic conditions: exceptional wind, rain, flood, fog, in a rain season including potential for hurricane, thunderstorm, abnormal over flood,
- State of infrastructure risk: roads, bridges, cut and completely impassable or destroyed
- Social factors: Crowds of people on the road (Gamou, Magal ...), events, disturbances to public order etc

Those risk assessment result to temporary delivery suspension or global termination of the convoy. Task force team member including client and government representative are involved on those critical risk assessment results.

Major risk is the subject of preventive and corrective or approved by stakeholders (customer, internal operations team ...)


- State of infrastructure: the presence of potholes, rough roads, bridge, road gradient, slippery roads, turn.

Minor risk: it is subject to corrective or preventive measures and approved by members of the security team.

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
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Summarize the basis for this Finding/Deficiencies Identified:

Procedure PO02 SP04 PCSN 08 Version A qualification and selection of drivers is implemented. In addition, specific trainings for selected drivers are developed and implemented as per procedure. Records have been verified on site during the audit. Following drivers competencies had been done and human resources department evaluate competencies at least on an annual base.

- Training loading and unloading hazardous materials including sodium cyanide # PO2SP04 PCSN05 Rev A
- Decontamination and elimination of waste hazardous materials including sodium cyanide # PO2SP04 PCSN09 Rev A
- Transportation dangerous goods (TDGs) version 2012
- Cyanide transportation procedure and work instructions # PO2SP04 PCSN03 Rev A
- Verification and protection of sodium cyanide emergency equipment # PO2SP04 PCSN I 03 Rev A
- Safety inspection for departure and trucks returns # PO02 SP04 PCSN08 E 12

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/Deficiencies Identified:

Sodium cyanide is received by ship and safely stored in sealed ISO containers. Procurement contract reviewed procedure indicates roles & responsibilities at each level of the procurement including supplier, port of Dakar at Senegal. The transporters responsibilities level begin when sodium cyanide containers are safely installed and sealed on their truck trailers. All manifests, transport documentation required by local government and insurance company including but not limited to:

- Senegal environmental ministry communication for sodium cyanide international order shipment.
- Risk assessments results sheet instruction and convoy mission report PO03 SP04 E07 Version A
- Convoy planning check list form.
- Hazardous materials qualification equipment # PO02 SP04 PCSN NO 3 E02
- Approval documentations for convoy mission (Manifest, TDGs, MSDS sheet, risk assessments results, spills kit, communication devices, cell, satellite etc.)
- Check list verification for approval vehicles # PO02SP04 PCSN 05 E6/A (pick up, cars, trucks and trailers transporting ISO containers.
- Check list verification for fleet on a daily planned stop. # PO02 SP04 PVSNO5-E07
- Safety verification check list form # PO02 SP04 PCSN 06 E09-A
- First aid and spill kit verification check list medical form. # PO02 SP04 PCSN06-E10/A
- Accident/incident declaration form # PO02 SP04 PCSN06-E08/A

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- Mission sheet daily report form # PO02 SP04 PCSN06-E01/A

Logistic department complete following document: Importation form # PO02 SP03 PCSN 02-B. Procedure loading sodium cyanide # PO02 SP04 PCSN05 and work instruction related to driver including check list form. Check list form criteria include, verification of ISO containers sealed, trailers lock, etc.

Procedure for carriers handling applied a provision of the UEMOA (Economic and Monetary of Union African) concerning maximum capacity of loading. A maximum of 24200 kilograms of Sodium Cyanide never exceeded

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/Deficiencies Identified:

All responsibilities related to logistics department to prepare and supply all documentations and check sheets control to be integrated and manage by the responsible of sodium cyanide convoy. This include but not limited to bill of lading, seals number series per ISO containers, several pictures of ISO containers convoy prior to leave Dakar port of Senegal. A complete check list criteria form is fully completed. Records are maintained on hard copies for seven (7) years. Procedure # PO02 SP04 PCSN 08 and control of records procedure implemented and maintained. Internal procedure indicates driving performed between 06:00 am sunrises to 19:00 pm sunrise time. Each driver shall indicate in the driver manifest time on and time out on a daily base. There was no transportation planned during the rainy season. However mission escort evaluate on a daily base route and road planned as per assessments results. Procedure # PO02 SP04 PCSN 04 A. Communication procedure # PO02 SP04 PCSN07 with client (mine site) resulting daily assessments reviewed and head office for any modification or proposed amendment to road and route assessments. Decision to modify or cancel daily planning is under a consensus between all parties.

International TDGs placards are posted on each side of trailers and trucks. Criteria on verification check sheet is also included. A complete check list criteria form is fully completed. Records are maintained on hard copies for seven (7) years.

A full documented corrective and preventive maintenance programs are established internally on a rigorous schedule and a semi-annual performed externally. Records reviewed indicate. Procedure # PO02 SP04 PCSN 08 and control of records procedure implemented and maintained.

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An internal procedure indicates driving performed between 06:00 am sunrises to 19:00 pm sunrise time. Each driver shall indicate in the driver manifest time on and time out on a daily base.

An internal procedure indicates driving performed between 06:00 am sunrises to 19:00 pm sunrise time. Each driver shall indicate in the driver manifest time on and time out on a daily base. There was no transportation planned during the rainy season. However mission escort evaluate on a daily base route and road planned as per assessments results. Procedure # PO02 SP04 PCSN 04 A. Communication procedure # PO02 SP04 PCSN07 with client (mine site) resulting daily assessments reviewed and head office for any modification or proposed amendment to road and route assessments. Decision to modify or cancel daily planning is under a consensus between all parties.

The human resources department is responsible to manage driver evaluation. Drug test and others medical exams are planned on an annual base. Documented procedure # PO02 SP04 PCSN 06 I 02 Rev A is implemented concerning drug and alcohol prevention program.

A documented procedure PO02 PCSN 01 B for documentations, control of documentations including control of records is under each department manager. Human resources manager maintain employees folders and files which include confidential employees health data's and information's including results of drug and alcohol testing or usage.


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/Deficiencies Identified:

Note: The transporter does not use air or sea transportation and/or shipments.

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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/Deficiencies Identified: (Due to the sensitivity of security issues regarding storage of cyanide, no descriptions of substantial or non-compliance with this aspect of the Transport Practice should be provided.)

An initial planning by mission teams of recognition is performed at least 4 weeks before the departure of cyanide convoy to the gold mine site. The communications levels are maintained between client's representative, government and local authorities to implement procedure for cyanide delivery. Communications are maintained by internet, telephone, cellular, satellite telephone, short wave radios. Mission convoy chief maintained up to date all contact names from the port of Dakar to the mine site where final sodium cyanide delivery. Local authorities for each town, village, country identified during the risk assessment are also maintained up to date as per communication procedure. Communication directory includes at least convoy members name, chief mission, escorts, truck drivers, additional security vehicle when necessary consequent risk assessment results. Performance reviewed, effectiveness and efficiency of electronic communications devices are also assessed taking into account country region necessary frequencies, private radio walky-talky, telephone and satellite cellular are rigorously tested and verified. Control of inspection and inventory records are maintained electronically and on soft copies for a period of seven (7) years.

Some documented procedures are implemented for tracking progress cyanide shipments.

- PROCEDURE # PO02 SP04 PCSN07 communication internal & external
- Procedure # PO02 PSCSN 01Rev B commercial communication
- Transportation of hazardous materials Rev B 16


In addition, all specific documented an updated Material Safety Data Sheet (MSDS) for shipment and transportation manifest submitted by local government authorities at Dakar port are carried by all truck drivers and chief of convoy mission. Those documents are available at all time at each level of the convoy mission.

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

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

Note: The transporter does not design, construct, or operate cyanide trans-shipping depots and interim storage sites.

3. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities

Transport Practice 3.1: Prepare detailed emergency response plans for potential cyanide releases

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

Summarize the basis for this Finding/Deficiencies Identified:

A detailed documented emergency response plan and capacity to react has been fully implemented. Controlled document # PO02 SP04 PCSN 06 A is communicated at each level of fleet management process. Forms and check list inspection criteria take into account risk for:

- Fall Containers.
- Drop and fall containers and container fractures.
- Drop and fall container with eventuation and victim.
- Discharge into a stream.
- Discharge consequent to severe fire.
- Discharge to water surface.

Transporter does not carried out sodium cyanide of liquid stage. Material Safety Data Sheet (MSDS) are available for truck drivers in appropriate languages. Each metal container transportation provider is placard according to international legislations on the Transport of Dangerous Goods (TDGs). Unloading ISO containers from the sea ships are under local port responsibilities of Dakar. The transporter does not attend to unload metal ISO containers of sodium cyanide on its trailers. Therefore he is responsible to ensure all documentations, and safe installations are validated by loading inspectors. Placards, manifests, safety equipment's, risk assessment results including selection of routes and road are under transporter responsibilities, its emergency plan take into account those aspects.

Transporter carries solid sodium cyanide state only. Just truck and trailers are used for transportation from public routes and road to gold mine site.

The solid cyanide sodium is transported in briquettes form. It is packed in waterproof bags (polypropylene + plastic). Polypropylene bags are placed in ISO containers over wood pallets.

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Each box weight one (1) ton and all wooden pallets are potted in an ISO container which net weight twenty (20) tons. Total weight of the goods is twenty two (22) tons. Container is: 2200kg. Each container contains 20 boxes of palletized sodium cyanide.

All appropriate emergency measures activities are planned through each scenario listed. Emergency measures plan specifies actions to take for each scenario and actions general basis for any incident relating to transportation of sodium cyanide. Those scenarios listed are mainly repeated:

- Fire
- Explosion
- Surface water and underground infiltration
- Soil and land surface contamination
- Specific response plans are described as following criteria:

Alert is signaled to all selected authorities. (Local, country, client, and local government representatives) Following steps are implemented:


- Immediate secure site
- Port of PPE's (personal protective equipment's)
- Intervention to minimize impacts
- Decontamination and Waste Treatment
- Analysis of environmental impact
- Escort identifies the nature of the accident; analyze the environment effect of the accident (rain, wind, rivers, population). Assess the severity of the accident (the presence of aggravating factors, victims, etc.
- Amount of spilled is evaluated, communicated and recorded.

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/Deficiencies Identified:

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All teams associated with carrier convoys are fully trained and educated on the PMU. This includes:

- Heads of Mission.
- Truck drivers
- Escort vehicles driver
- Health and safety teams.
- Security escort officers

Training programs contained has been reviewed: Information on the characteristics of product sodium cyanide included but not limited to:

- Hazards associated with cyanide and preventive measures
- Symptoms of cyanide poisoning
- Procedures for emergency first aid cyanide
- Use proper personal protective equipment and collective
- Proper use of emergency equipment
- Procedure for emergency
- Procedure for decontamination and disposal
- Simulation Exercises

All emergency equipment including interventions specialist, local authorities, names and date of purchase and recent planned inspection for all equipment are:

- The first aid kits.
- The clothing and personal protective equipment.
- The batches equipment and materials recovery and neutralization of cyanide.
- Reagents and poison antidotes including dates of expiring dates etc.
- Electronic communication equipment's inspected and tested.


Following equipment has been observed during the audit:

- Safety certified hat and helmet
- Protective goggles certified
- Nitrile gloves, leather, neoprene appropriate for the nature of the interventions.
- Clothing color CSTT-OA standardized carrier-Group
- Extinguishers ABC (5) kg with label inspection.
- First aid kit and first responder spill kits
- Emergency mask for sodium cyanide dust.

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 Transport Practice 3.3
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Summarize the basis for this Finding/Deficiencies Identified:

Global management processes and procedures section 6.1 of manual clarify traceability to identify all necessary information's for shipper, receiver/consignee, regulatory agencies, outside response providers, medical facilities of sodium cyanide. Section outlined 6.1 of global manual identify all modes of communication and notifications. All current members of sodium cyanide convoy are aware of stakeholders information's including suppliers, delivery mine site customers, local contact of hospitals, and the local police department. Electronic communications are maintained between stakeholders in the process, merchandise transported the convoy, and GPS location-based methods. Procedures for communications # PO02 SP04 PCSN07 Rev A, described step by step how to maintain current and updated information's and process to communicate it

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 Transport Practice 3.4
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:


Section 3.0 to 6.0 of global management processes explain how emergency scenarios and methods of intervention in case of discharge of sodium cyanide diverse on surface waters, on surface ground and underground infiltration are treated. Documented procedures are developed and available for the convoys. Remediation protocols are established for the following scenarios:

Remediation protocols are established for the following scenarios:

Falling container with major spills included:

- Immediate government authorities, local, country etc.
- Inventory recognition.
- Inform the competent authorities.
- Establishment safe wide area.
- Prepare response equipment. (Pumps, bags, shovel, etc.)
- Accurate communication with authorities and gold mine site for proper intervention.
- Perform initial test (water test, soil test etc.)
- Filling the holes with rags and cover with plastic wrap for sealing.
- Marking and pickup in pairs with an agent, shovel and the second holds the trash bag. Garbage bag is strengthened (doubled or tripled). Picked up product is transported to the mine site.
- Pollution (ground material response team): Spray the affected area with reactive cyanide destruction. Decontaminate an area as wide as possible.
- Conclude additional tests.

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- Monitoring contaminated areas.
- Perform a second test
- Monitoring places
- The truck is lifted and delivered to the customer. The truck will remain in the last position of the convoy inspection at regular intervals.

Remediation with major spill with victim included:


- Inventory (recognition)
- Inform the competent authorities
- Establishment of the wide area
- Port of response equipment
- Establishing a safety zone
- Isolate the victim
- Pollution (ground material response team): Spray the affected area with reactive cyanide destruction. Decontaminate an area as wide as possible. Perform a second test
- Monitoring places
- Awaiting lifting equipment
- Truck is lifted and delivered to the customer. The truck will remain in the last position of the convoy inspection at regular intervals

Remediation with major spill with victim:

- Inventory (recognition)
- Inform the competent authorities
- Establishment of the wide area
- Port of response equipment
- Establishing a safety zone
- Isolate the victim
- Pollution (ground material response team): Spray the affected area with reactive cyanide destruction. Decontaminate an area as wide as possible. Perform a second test
- Monitoring places
- Awaiting lifting equipment

A global procedure and emergency preparedness and response plan specify than transporter CSST-OA Group does not utilize sodium hypochlorite, ferrous sulphate, and hydrogen peroxide to treat cyanide into surface water. Training data base indicate truck drivers, first responders as escort, security officers and external authorities had been awarded regarding decontamination process.

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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/Deficiencies Identified:

An emergency plan and capacity to react is periodically reviewed on a semi-annual base or following emergency drill and tested or after a management review meeting with top management head office located at Dakar, Senegal. Records reviewed by year 2011 and December 2012 confirm modification to plan adequacy. Government representatives are awarded of any major changes to the ERP (emergency response plan).

A simulation has been performed in July 2012 and conducted by consultant firm. A simulation of an ISO container with eventer intoxicated victim was planned. The review of the emergency accident scenarios involving cyanide containers indicates sodium cyanide diverse on the public road. General and specific information's for each participant were clearly identified. Few external authorities were invited to participate as figurant or observer. Report and meeting minutes related to drill and exercise required additional provision to maintain periodic drill as per training matrix identification.

Documented human resources procedure # PO02 SP04 PCSN 06 for review of the management system of sodium cyanide take into account KPIs (Key Performance Indicators) of performance measurement parameters to validate the effectiveness, efficiency management system and measures taken to improve management global performance. Statistics, spills, potential of incidents, near misses, and other abnormal situations related during sodium cyanide transport and all external claims, complains received by top management following a sodium cyanide convoy to gold mine sites in West Africa.

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