



September 2016

INTERNATIONAL CYANIDE MANAGEMENT
CODE CYANIDE TRANSPORTATION AUDIT

CSTT-AO Group Sénégal Re-
Certification Audit, Summary
Audit Report

Submitted to:

International Cyanide Management Institute (ICMI)
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REPORT



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Distribution:

- 1 Copy (+1 Electronic) – International Cyanide Management Institute
- 1 Electronic Copy – CSTT-AO Group Sénégal
- 1 Electronic Copy – Golder Associates Pty Ltd





Table of Contents

1.0 INTRODUCTION	1
1.1 Operational Information	1
1.2 CSTT-AO Group Sénégal	1
1.3 Auditors Findings and Attestation	1
1.4 Name and Signatures of Other Auditors	2
1.5 Dates of Audit	2
2.0 CONSIGNOR SUMMARY	3
2.1 Principle 1 – Transport	3
2.1.1 Transport Practice 1.1	3
2.1.2 Transport Practice 1.2	4
2.1.3 Transport Practice 1.3	4
2.1.4 Transport Practice 1.4	5
2.1.5 Transport Practice 1.5	6
2.1.6 Transport Practice 1.6	6
2.2 Principle 2 – Interim Storage	8
2.2.1 Transport Practice 2.1	8
2.3 Principle 3 – Emergency Response	9
2.3.1 Transport Practice 3.1	9
2.3.2 Transport Practice 3.2	10
2.3.3 Transport Practice 3.3	10
2.3.4 Transport Practice 3.4	11
2.3.5 Transport Practice 3.5	11
3.0 IMPORTANT INFORMATION	12

APPENDICES

APPENDIX A

Important Information



1.0 INTRODUCTION

1.1 Operational Information

Name of Transportation Facility: CSTT-AO Group Sénégal transport operations
Name of Facility Owner: CSTT-AO Group
Name of Facility Operator: CSTT-AO Group Sénégal
Name of Responsible Manager: Aissatou Kebe, Directeur Stratégie et Développement
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1.2 CSTT-AO Group Sénégal

CSTT-AO Group (CSTT) was founded in 1949 in Sénégal. It is focused on logistics, freight forwarding and transit services and has a vision of being a leading independent transport company within Africa. The company has procurement houses located in South Africa and Europe.

Approximately 80% of CSTT's business is focused on the mining industry. CSTT transports cyanide to the Sabodala mine site in Sénégal and Loulo mine site in Mali.

1.3 Auditors Findings and Attestation

in full compliance with
CSTT-AO Group 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

CSTT-AO Group

Name of Facility

Signature of Lead Auditor

6 September 2016

Date



1.4 Name and Signatures of Other Auditors

Name	Position	Signature	Date
Ed Clerk	Lead Auditor and Technical Specialist		6 September 2016

1.5 Dates of Audit

The ICMC Certification Audit was conducted over two days between 9 and 10 May 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.

CSTT-AO Group

Name of Facility

Signature of Lead Auditor

6 September 2016

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.

CSTT-AO Group is in full compliance with **Transport Practice 1.1**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

CSTT 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. The procedure considers numerous hazards including population density, infrastructure construction and condition, road pitch and grade, and prevalence and proximity of water bodies and fog. CSTT 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 as the most appropriate route to deliver cyanide to customers in Sénégal and Mali.

Hazards identified during the route survey are risk assessed using the risk assessment process described in the Route Assessment Procedure. These hazards are assessed and categorised into critical, major and minor risks. Once assessed, CSTT take the measures necessary to manage these risks.

CSTT has implemented a procedure requiring biannual route surveys and has a process for obtaining feedback on route conductions during each convoy. The convoy procedures require the Chef de Mission to develop a summary report.


CSTT has documented measures taken to address risks identified with the selected routes. The hazards are identified via the road survey reports.

CSTT seeks input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures.

Convoys are used as a means of managing the risks of the road conditions and responding to emergencies. A maximum of eight containers are transported within each convoy which consists of technicians, truck drivers and escort team members, which includes a medic and firefighters. The eight trucks are lead and tailed by two escort pickups.

Cyanide is delivered in convoy over an eight month campaign each year during the dry season.

In the event of an incident, primary emergency response is coordinated by CSTT escort personnel. The duties of primary responders include immediate notification to government authorities and medical facilities (as necessary). Secondary response activities are conducted by CSTT, emergency services (as required) and the mine sites.

<u>CSTT-AO Group</u>		6 September 2016
Name of Facility	Signature of Lead Auditor	Date



The Mali and Sénégal public external responders do not have a direct role in incident management outside of their normal duties and CSTT has consequently limited their consultation.

CSTT does not subcontract any of the cyanide handling or transport.

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.

CSTT-AO Group is in full compliance with **Transport Practice 1.2**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

CSTT 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.

CSTT only uses trained and competent operators to drive its trucks. CSTT has dedicated drivers that have appropriate training and vehicle licences to transport cyanide. The training matrix is used by Human Resources to track driver licence currency. 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 CSTT.

All personnel operating cyanide transport equipment have been trained to perform their jobs in a manner that minimises the potential for cyanide releases and exposures. The Directeur Stratégie et Développement advised that cyanide drivers are recruited from container drivers who are then trained in dangerous goods courses. Additional training requirements are specified within the Manuel de Transport de Matières Dangereuses.

CSTT does not subcontract any of the cyanide handling or transport.


2.1.3 Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

CSTT-AO Group is in full compliance with **Transport Practice 1.3**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

CSTT-AO Group  6 September 2016
 Name of Facility Signature of Lead Auditor Date



CSST only uses equipment designed and maintained to operate within the loads it will be handling when transporting cyanide. The company has prime movers and trailers dedicated to dangerous goods transportation. The prime movers have a 6 x 4 configuration and an appropriate vehicle power rating. The trailers carry single containers with an axel load that is within the CEDEAO limit for public roads. No other load bearing equipment is used by CSTT for cyanide.

CSTT has a preventative maintenance programme based on truck engine hours (every 10,000 hrs) and convoy schedules with checks done before and after each convoy. The inspection includes visual observations on the prime mover for signs of stress. A mechanic and electrician also accompany the convoy.

Subcontractors are used for maintenance activities.

Procedures are in place to verify the adequacy of the equipment for the load it must bear. Prime movers and trailers were purchased to a design specification appropriate for the cyanide transport task. CSTT has implemented a preventative maintenance program to ensure the load bearing capacity and adequacy of the vehicles are maintained.

Procedures are in place to prevent overloading of the transport vehicle being used for handling cyanide. Mission Reports, completed during each convoy, record the number of the truck and the containers carried by the truck.

CSTT does not subcontract any of the cyanide handling or transport.

2.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

in full compliance with

CSTT-AO Group is

in substantial compliance with

Transport Practice 1.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

CSTT has procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging. Checks are conducted when containers are loaded onto trucks at the port and visual inspections of the containers are completed throughout the journey. A record of the inspections is noted on the Mission Reports.

Placards are used to identify the shipment as cyanide, as required by 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.

CSTT has implemented a safety program for cyanide transport that includes (where appropriate or applicable) the following:

- Vehicle inspections;
- Preventative maintenance;

CSTT-AO Group

Name of Facility

Signature of Lead Auditor

6 September 2016

Date



- 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;
- Drug abuse prevention; and
- Retention of records documenting the above activities.

CSTT does not subcontract any of the cyanide handling or transport.

2.1.5 Transport Practice 1.5

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

in full compliance with

CSTT-AO Group 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 CSTT.

CSTT does not transport consignments of cyanide by air within the scope of this audit.

2.1.6 Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

in full compliance with

CSTT-AO Group is

in substantial compliance with

Transport Practice 1.6

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

CSTT is in FULL COMPLIANCE with Transport Practice 1.6 requiring the operation to 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 convoy escort vehicle.

The two way radios are used for internal convoy communication. The Chef de Mission uses the cell phone or satellite phone to communicate (SMS or voice) with the Depot every day. Once the report has been received, the CSTT Logistics Officer sends an email update to the mine.

Communication equipment is periodically tested to ensure it functions properly. The testing is conducted as part of the pre departure inspection process and through continual use. The pre departure inspection forms are included within the Mission Reports.

CSTT-AO Group
Name of Facility


Signature of Lead Auditor

6 September 2016
Date



CSTT-AO GROUP SÉNÉGAL RE-CERTIFICATION AUDIT, SUMMARY AUDIT REPORT

CSTT has identified communication blackout areas along transport routes as part of the route assessment process, and consequently cell phone signals, two way radios, satellite phones and GPS tracking are used as the communication methods. Rest stops are not located within communication blackout areas.

CSTT has systems to track the progress of cyanide shipments. The GPS tracking system continuously transmits position and other data from each truck throughout the trip. The Chef de Mission uses the cell phone or satellite phone to communicate (SMS or voice) with the Depot every day. Once the report has been received, the CSTT Logistics Officer sends an email update to the mine.

All movements of trucks is tracked via a GPS system which is monitored by CSTT.

CSTT implement chain of custody procedures to prevent loss of cyanide during shipment. The Chef de Mission 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 the Way Bill acknowledging that the consignment was received in good condition and unopened.

Shipping records indicating the amount of cyanide in transit and Material Safety Data Sheets are available during transport.

CSTT does not subcontract any of the cyanide handling or transport.

CSTT-AO Group

Name of Facility

Signature of Lead Auditor

6 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

CSTT-AO Group 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 CSTT.

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 CSTT and taken to the Maintenance Depot where they are stored on the truck overnight in preparation for convoy departure the following morning.

CSTT-AO Group

Name of Facility

Signature of Lead Auditor

6 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

CSTT-AO Group is

in substantial compliance with

Transport Practice 3.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

CSTT has developed an Intervention D'urgence and supporting emergency response procedures to address potential cyanide transportation emergencies within Sénégal and Mali. The development of the Intervention D'urgence was based on the route surveys and risk assessment.

The emergency response procedures are appropriate for the selected transportation routes. CSTT does not undertake any interim storage activities. The route evaluation process, hazard/risk assessment process, and operational experience was used by CSTT to identify likely emergency scenarios within the ERP. The Emergency Response Plan details the required actions under each of the following scenarios:

- Vehicle rollover (no release)
- Vehicle rollover and cyanide release.
- Victim decontamination
- Vehicle rollover, cyanide release and cyanide exposure

The emergency response procedures consider the physical and chemical form of cyanide. The procedures contain response information for scenarios relevant to solid cyanide and its packaging in IBCs. Material Safety Data Sheets that detail the chemical form of cyanide are readily available.

The emergency response procedures are based on road transportation via convoy, and consider all aspects of the transport infrastructure as they were developed using the route evaluation process and hazard/risk assessment process.

The emergency response procedures consider the design of the transport vehicles. The plans are specifically drafted around the transport of solid cyanide in IBCs packed within 20 foot sea containers. Single containers are transported on flat top trailers pulled by 6 x 4 trucks.

The emergency response procedures include descriptions of response actions, as appropriate for the anticipated emergency situation, and detail the roles and responsibilities for CSST personnel for each scenario.

CSTT-AO Group

Name of Facility

Signature of Lead Auditor

6 September 2016

Date



Outside responders and medical facilities are not allocated roles within the CSTT emergency documentation outside of their normal duties. In the event of an incident, primary emergency response is coordinated by CSTT escort personnel. Secondary response activities are conducted by CSTT, emergency services (as required) and the mine sites. The community is not designated a role as part of the planned response to an emergency.

2.3.2 Transport Practice 3.2

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

in full compliance with

CSTT-AO Group is

in substantial compliance with

Transport Practice 3.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

CSTT provides emergency response training of appropriate personnel. The training requirements, including training frequency, are specified within the Manuel de Transport de Matières Dangereuses and emergency response procedures. Training includes annual emergency response (mock drill) training.

Training matrix and records were viewed.

Descriptions of the specific emergency response duties and responsibilities are detailed within the Emergency Response procedures. The roles and responsibilities (including duties) for CSST personnel are detailed in the Définition des Rôles et Responsabilités en Cas D'accident Pendant Le Convoyage de Produits Dangereux procedure.

CSTT maintains a list of all of the emergency response equipment that should be available during the transport route. The equipment is inspected against the equipment list to ensure it is present and checked to ensure it is in good order. The checklist is completed as part of the preparations for each convoy of cyanide deliveries.

CSTT has the necessary emergency response and health and safety equipment, including personal protective equipment during transport. During the site inspection, the equipment was compared to the emergency response equipment checklists.

CSTT does not subcontract any of the cyanide handling or transport.

2.3.3 Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

in full compliance with

CSTT-AO Group is

in substantial compliance with

Transport Practice 3.3

not in compliance with

CSTT-AO Group

Name of Facility

Signature of Lead Auditor

6 September 2016

Date



Summarise the basis for this Finding/Deficiencies Identified:

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

CSTT maintains a procedure and current contact information for notifying the shipper, the receiver/consignee, outside response providers, and medical facilities of an emergency. The communication process is documented in Procedure de Communication du Convoi procedure and the numbers are detailed on the Contact List.

The emergency response documentation and route assessment processes contain procedures to ensure that internal and external emergency notification and reporting procedures are kept current. The route assessment process is used by CSTT to update all contact numbers annually.

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

CSTT-AO Group is

in substantial compliance with

Transport Practice 3.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

CSTT 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.

CSTT 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 procedures describe the decontamination and remediation processes for both minor and major spills.

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

2.3.5 Transport Practice 3.5

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

in full compliance with

CSTT-AO Group is

in substantial compliance with


Transport Practice 3.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

CSTT-AO Group
Name of Facility



Signature of Lead Auditor

6 September 2016
Date



There are provisions within the Intervention D'urgence for reviewing emergency documentation annually and following mock drill events. The Intervention D'urgence has been reviewed several times during the recertification period in conformance with the procedural requirements.

The emergency response procedures contain provisions for conducting Mock Drills. Additionally, the training program requires these drills to be conducted annually. Drills were completed by CSTT in July 2013, June 2014 and June 2015.

Debrief reports were compiled for each drill.

CSTT has procedure to evaluate the performance of the Intervention D'urgence after its implementation and revise it as needed. This is specified within the document.

No cyanide incident occurred during the recertification period.

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.

CSTT-AO Group

Name of Facility

Signature of Lead Auditor

6 September 2016

Date



Report Signature Page

GOLDER ASSOCIATES PTY LTD

A handwritten signature in black ink, appearing to read 'Ed Clerk'.

Ed Clerk
ICMC Lead Auditor and ICMC Transportation Expert

JEJ/EWC/hn

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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.

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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.

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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.

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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.

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