



**International Cyanide Management Code
Cyanide Production
Summary Audit Report**

**DuPont European Cyanide Supply Chain
Warehouse and Distribution
Certification Audit**

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

2012 Audit Cycle



www.mss-team.com

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European Supply Chain Summary

Company Summary

Company Names & Contact Information

Name of Operation:	DuPont Corporation - European Supply Chain Wilmington, Delaware USA
Name and contact information for DuPont Contact:	Donald Jeffery Cyanide Business Global Product Stewardship Manager Email: Donald.W.Jeffery@USA.dupont.com Tel. (623) 444-2989
VLS Warehouse Location	Kruisweg 2 (Port # 650) B-2040 Antwerpen
SGS Emergency Response Services	Noorderlaan 87 B-2030 Antwerpen

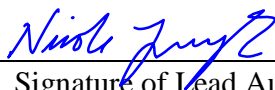
Supply Chain Overview

E.I. DuPont de Nemours and Company, Inc. (DuPont) is a science-based company operating in more than 70 countries. DuPont offers a wide range of products and services for markets including agriculture, nutrition, electronics, communications, safety and protection, home and construction, transportation and apparel.

DuPont was one of the original 14 International Cyanide Management Code (ICMC) signatory companies announced on November 3, 2005. As such, DuPont made the commitment to obtain ICMC certification for its Memphis Solid Cyanide Plant and its Warehouse operations. DuPont was the first Cyanide Producer in the world to achieve certification in June 2006 and the operation was re-certified in 2009.

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DuPont produces sodium cyanide for use in the gold mining sector at the Memphis, Tennessee plant in the United States. DuPont maintains several cyanide distribution terminals and delivers solid and liquid cyanide to mining customers throughout the world. Cyanide that is distributed through the European Supply Chain and sold to gold mining customers is packaged in 1 ton bag/box packaging and is stored in Antwerp, Belgium prior to being distributed world-wide. The storage and distribution of cyanide stored and distributed from the VLS Warehouse was the subject of this audit.

The DuPont European Supply Chain for sodium cyanide consists of the DuPont Customer Service, Logistics, and Product Stewardship personnel for Supply Chain Management, warehousing activities at a VLS-Group operated warehouse in the Port of Antwerp, Belgium, and emergency response, testing, and remediation services that are performed by SGS, a service provider located near the warehouse.

All organizations and supply chain components (DuPont Antwerp Operations (European-based Customer Service, Logistics, and Distribution), VLS (warehousing in Antwerp), and SGS (emergency response services) were included in this ICMC Certification Audit. Each organization underwent a full on-site ICMC audit and was found to be in full compliance with ICMC requirements.

Description of the VLS-Group Warehouse Operation

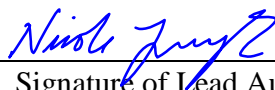
The VLS-Group warehouse evaluated during this audit is located within the boundaries of the Port of Antwerp in Belgium. Previously part of the Royal Vopak organization, the VLS-Group was formed in 2003. VLS-Group operates nine warehouses in Europe and manages approximately 200,000 square meters of warehouse space. The VLS-Group specializes in the storage and handling of hazardous materials. Chemical storage facilities with hazard-specific design parameters are available for numerous types of hazardous materials. Storage areas are constructed and operated in a way that ensures that incompatible materials are segregated, ventilation is appropriate, and that chemicals and potential spills are appropriately contained.

The VLS warehouse receives truck and ocean shipments of solid sodium cyanide. Cyanide that is shipped to gold mine customers is received in bag/box packaging in either dry van trailers or intermodal sea containers. The cyanide is unloaded by VLS employees and is stored in a covered well-ventilated warehouse prior to being distributed to customers. The cyanide packaging is not opened by VLS at any point during the operation.

Outward bound cyanide that is shipped to gold mine customers is packed into intermodal containers by VLS personnel. The VLS material unloading, warehousing, and intermodal container loading operations were evaluated during this audit.

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The warehouse is located within the Port of Antwerp boundaries and material handling personnel who work for the Port Authority move the intermodal containers to the shipping docks for ocean transport. The results of the ICMC Due Diligence evaluations of the Port of Antwerp and the Ocean Carriers are included in the 2012 DuPont Ocean Supply Chain Certification Audit Addendum report.

Audit Implementation and Conclusions

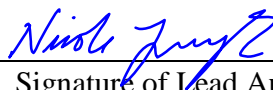
This report contains information regarding the on-site International Cyanide Management Code (ICMC) Certification Audits conducted of the DuPont European Cyanide Supply Chain management activities, of the VLS-Group cyanide warehouse activities using the *ICMI Cyanide Production Verification Protocol (2011)*, and of the SGS emergency response services provided to DuPont in support of their management of the European Cyanide Supply Chain.

The audit was conducted on January 23-25, 2012 in Antwerp, Belgium. Personnel and operations at the DuPont offices, the VLS-Group warehouse at the Port of Antwerp, and at the SGS emergency response offices near the Port were included in the audit. Interviews were conducted, policies and procedures were reviewed, records were evaluated, operations were observed, and equipment and facilities were inspected.

The audit was performed by an independent third-party auditor who was pre-approved by the ICMI as a Lead Auditor for all types of International Cyanide Management Code (ICMC) audits and as a technical expert for ICMC audits of cyanide transportation and production operations.

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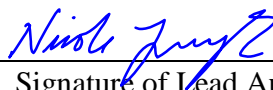
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Personnel interviewed during the audit included:

Topic (Production Practice) →		1.1 QA / QC – Design of Facility	1.2 Safe Operations to Avoid Accidents	1.3 Inspect Facilities and Equipment	2.1 Safety Procedures – Protect Against Exposure	2.2 Plans and Procedures for Response to Exposure	3.1 Environmental Monitoring	4.1 Train Employees in Safe Operations	4.2 Train Employees to Respond to Emergencies	5.1 Emergency Response Plan	5.2 Involve Stakeholders	5.3 Emergency Response Resources	5.4 Notification Procedures	5.5 Remediation & Cyanide in Water Hazards	5.6 Emergency Response Drills	General Management Structure	Distribution & Supply Chain Management
Audit Participants	Organization																
Safety, Health, Environment, and Quality (SHEQ) Manager	VLS-Group	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
Logistics Manager	VLS-Group	X		X					X	X					X		
Cyanides Product Steward	DuPont – Europe / Middle East / Africa Region				X			X		X	X	X	X	X	X		
Product Stewardship Manager	DuPont - US	X							X	X				X		X	
General Manager	VLS-Group	X					X				X					X	
Customer Service Manager - Europe	VLS-Group	X	X					X	X	X					X	X	
Customer Service Personnel	VLS-Group												X			X	X
Operations & Warehouse Personnel – Antwerp	VLS-Group		X	X	X	X		X	X	X		X	X		X		X
Sourcing & Logistics Personnel	DuPont Europe										X					X	
Emergency Response Personnel	SGS									X	X	X	X	X	X		
Customer Service Personnel	DuPont Europe				X			X	X	X	X		X			X	X

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DuPont Supply Chain Certification Audit - Auditor's finding and attestation

Cyanide management practices for the DuPont European Supply Chain were evaluated for ICMI ICMC compliance using the *ICMI Cyanide Production Verification Protocol (2011)*. DuPont internal Standards, Policies, Practices, and Procedures regarding the management of the Cyanide Transportation Supply Chain were reviewed.

The audit was conducted through discussions and interviews with DuPont personnel, VLS personnel, and SGS emergency response personnel who are contracted to DuPont to provide emergency response, testing, and remediation services in the event of a cyanide release or upset condition at the VLS warehouse.

Additionally, records regarding shipment tracking, incident tracking, security measures, shipping documentation, community involvement, and emergency response records were randomly sampled during the audit and were found to be acceptable.

DuPont maintains a mature supply chain management infrastructure to ensure that all necessary import and export licenses are maintained and that the status and location of shipments is known at all times. Interviews were conducted with DuPont and VLS customer service personnel and shipment records were reviewed. Communication pathways between DuPont, and its supply chain partners, and its customers are very well established and maintained. Corrective action systems at DuPont were also evaluated and personnel were able to demonstrate that information is very well organized, computer systems are appropriate, and that issues requiring attention are effectively tracked to resolution.

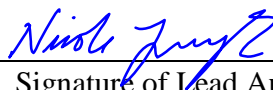
The results of the this certification audit indicate that DuPont and all portions of its European Supply Chain are in FULL COMPLIANCE with International Cyanide Management Code requirements.

VLS Warehouse Certification Audit - Auditor's finding and attestation

The VLS-Group warehouse practices were evaluated for ICMI Code compliance using the *ICMI Cyanide Production Verification Protocol (2011)*. VLS internal Standards, Policies, Practices, and Procedures regarding the management of the operations were also reviewed. Overall warehouse operations, shipment tracking, inventory management, and distribution activities were evaluated. The audit was conducted through discussions and interviews with multiple individuals in cross-functional roles at VLS (see table on previous page). Records were randomly sampled for all ICMC requirements and were found to be acceptable.

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The results of this certification audit indicate that the VLS-Group Cyanide Warehouse Operations are in FULL COMPLIANCE with International Cyanide Management Code requirements.

Auditor's Finding

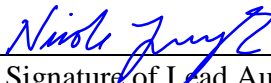
All DuPont European cyanide supply chain management practices, VLS warehouse unloading, material management, storage, loading, and distribution activities, and SGS emergency response activities were found to be in FULL COMPLIANCE with the requirements of the International Cyanide Management Code according to the *ICMI Cyanide Production Verification Protocol (2011)*. All personnel were very well prepared for the audit. The audit team found that the overall level of preparedness and understanding of ICMC requirements was excellent.

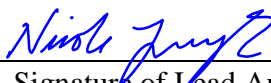
The DuPont European Sodium Cyanide Supply Chain is in full compliance with the ICMI International Cyanide Management Code.

Audit Company:	MSS Code Certification Service www.mss-team.com
Lead / Technical Auditor:	Nicole Jurczyk E-mail: CodeAudits@mss-team.com
Date(s) of Audit:	January 23-25, 2012

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Certification 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 the Audit Reports accurately describe the findings of the certification audit. I further attest that the certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Production Operations and using standard and accepted practices for health, safety and environmental audits.

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Name of Operation	Signature of Lead Auditor	Date

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VLS-Group Warehouse Certification Audit Results

1. OPERATIONS: Design, construct and operate cyanide production facilities to prevent release of cyanide.

Production Practice 1.1: *Design and construct cyanide production facilities consistent with sound, accepted engineering practices and quality control/quality assurance procedures.*

The operation is **in full compliance with Production Practice 1.1**

Summarize the basis for this Finding:

The VLS-Group (VLS) warehouse facility was built using sound, accepted engineering practices. Quality check or sign-offs obtained during the construction phase are not maintained by VLS, however VLS was able to demonstrate that a third-party risk assessment evaluation was performed by a Professional Engineer and that the warehouse was found to be suitable for cyanide storage. The Risk Assessment reports from 2005 that concluded that the construction was acceptable for a number of different types of chemicals specifically included sodium cyanide as being one the commodities being stored. Additionally, this information was accepted by local authorities for the issuance of an operations permit which includes the permission to store solid sodium cyanide.

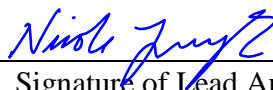
There are no cyanide solutions or process equipment at this facility. The floor of the storage area is concrete and steel. Trenches are constructed of concrete, which is compatible with solid cyanide and potential spilled materials.

There are no material feed systems or other mechanical systems in use at this facility. The cyanide packages are not opened. Emergency shut-off valve systems for the protection of storm water are tested twice per year by local authorities.

The cyanide storage area is built on a concrete floor that is at least 18 cm thick in all areas. Additionally, a clay barrier was installed under the concrete at the time of construction. The concrete floor and concrete pad in the loading/unloading areas of the warehouse was found to be in excellent condition. The entire warehouse storage area has a sloped floor that acts as secondary containment. Drains in the warehouse and in the truck unloading/loading area lead to collection sumps that would be pumped out and processed appropriately in the event that water

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was collected. The warehouse has appropriate containment systems that ensure full containment with sufficient storage capacity in case of a storm event bringing rain water.

Production Practice 1.2: Develop and implement plans and procedures to operate cyanide production facilities in a manner that prevents accidental releases.

The operation is in full compliance with Production Practice 1.2

Summarize the basis for this Finding:

Standard operating procedures are maintained by the VLS operation. The procedures are well-organized and were available for review during the audit. The procedures were sampled throughout the audit and were found to be appropriate for ensuring environmentally sound operation of the facility.

VLS maintains an emergency procedure for each warehouse that describes what should be done in case of a material spill. Procedures are also maintained to address emergency situations involving human exposure scenarios. Additionally, SGS, the emergency response organization contracted to respond to chemical spills, maintains an emergency plan specifically for the response actions that would be required in the event of a release of sodium cyanide. Operations personnel and emergency response personnel were interviewed and their awareness level of emergency and contingency procedures was very good.

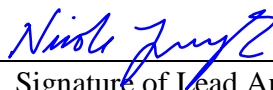
Operating procedures are formally maintained, reviewed at regular frequencies, and approved prior to use. VLS maintains an integrated Safety, Health, Environment, and Quality (SHEQ) management system that is certified to ISO 9001 and has been assessed by the European Chemical Industry (CEFIC) according to the Safety and Quality Assessment Systems (SQAS) program. The appropriate control of operating procedures and the management of change of operating processes is audited at least annually by third-party management system auditors as part of the certification programs to which the VLS-Group subscribes.

The only material handling equipment used at this site is forklifts. Records showed that required maintenance is being completed as planned. Environmental Plans are in place to prevent unauthorized/unregulated discharge to the environment of any cyanide-containing water.

Waste from clean-up activities following a packaging breach would be decontaminated and disposed of by the emergency response company SGS. SGS maintains procedures for the decontamination and disposal of contaminated solids. All disposal is done in accordance with EU regulations.

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The storage facility is continuously ventilated at all times. Large air vents were designed into the walls and roof lines of the warehouses. Ventilation was found to be appropriate in all storage areas.

There is no storage of cyanide outside of the roofed storage area. Loading, unloading, and material handling is also done under roofed portions of the loading dock. This practice helps to ensure that the potential for cyanide being exposed to moisture is minimized. Additionally, the solid cyanide briquettes are stored in water-tight packaging and the packages are not opened at this facility.

The perimeter of the facility is fenced and monitored at all times. The warehouse is within the boundaries of the Port of Antwerp and the area is not accessible to the public. The cyanide producer controls the labeling and packing specifications for all products. Processes exist within the DuPont Corporation to ensure that packaging and labeling are appropriate for the jurisdictions through which the load will pass. The languages printed on the containers, for example, appear in English, the language of the destination country, and also in 6 standard European languages. All packages and containers observed during the audit had appropriate packaging and labeling.

Production Practice 1.3: Inspect cyanide production facilities to ensure their integrity and prevent accidental releases.

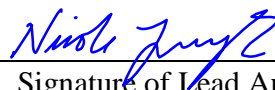
The operation is in full compliance with Production Practice 1.3

Summarize the basis for this Finding:

This location only stores and handles solid sodium cyanide. Interviews confirmed that all secondary containment areas are appropriate for the operation and are in excellent condition. Monthly safety inspections of the facility are conducted. Records were sampled and were found to be appropriate. Containment systems are monitored as part of the facility maintenance program. There are no cyanide solution tanks or process solution tanks or piping at this facility. Records showed a checklist of items that are inspected, the name of the inspector, and any observed deficiencies. Actions taken in response to problems in the field were clearly documented in the records.

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2. **WORKER SAFETY: Protect workers' health and safety from exposure to cyanide.**

Production Practice 2.1: Develop and implement procedures to protect plant personnel from exposure to cyanide.

The operation is **in full compliance with Production Practice 2.1**

Summarize the basis for this Finding:

Worker exposure to cyanide is minimized through the use of personal protective equipment (PPE) and through the safe operation of the facility. The minimum PPE requirements are defined in the Standard Operating Procedures, which were reviewed during the audit. Proper use of PPE was observed in all areas of the operation. All cyanide packaging is sealed.

In the event that a package breaks open or is found to have spilled, workers block off the area and call the emergency response company, SGS. Workers do not clean up any spilled cyanide, regardless of the volume of material spilled. This practice was confirmed through interviews with the warehouse material operators and SGS personnel.

Non-routine and emergency operations are performed by trained personnel wearing appropriate PPE. Emergency procedures are defined in the site Emergency Response Plans maintained at VLS and at SGS. Warehouse employees showed excellent awareness of PPE requirements and emergency response requirements.

There is no process equipment at this facility. General PPE requirements for all areas in which cyanide may be present are clearly defined and are well understood by all personnel interviewed.

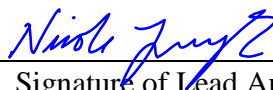
The Safety, Health, Environment, and Quality (SHEQ) management system is used to manage proposed operational changes. The SHEQ Manager reviews all proposed operational and facility changes to ensure that operations continue to be in compliance with the law and protective of human health and the environment.

Employee involvement is achieved through employee attendance at Safety Meetings. Employee participation in the development and maintenance of safety practices was found to be acceptable.

There are no areas where cyanide gas or dust can be generated during normal operations. In the event of an emergency, external emergency responders would be called in immediately. This practice was confirmed through interview.

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No hydrogen cyanide monitoring equipment is used by VLS. Calibration records for monitoring equipment used by SGS (the emergency responders) were found to be acceptable.

The buddy system is used for all tasks. Employees have radios and access to Management, Security, and Emergency Response Personnel at all times.

Employees' health is evaluated upon hire and periodically thereafter. Health exams are used to evaluate the employee general health and confirm fitness for duty.

The general worker safety policy is that work overalls, gloves, and shoes are to be left in the changing room at the warehouse and are not to be brought home. The operation has posted signs that limit access to cyanide storage areas. PPE signs are posted in appropriate locations.

All sodium cyanide packages were clearly marked with appropriate labeling and placards. The cyanide storage areas also had additional signs mounted on metal poles indicating that additional precautions should be taken due to the presence of poisonous materials.

Eating, drinking, smoking, open flames are prohibited where there is a potential for cyanide contamination. Employees showed very good awareness of the restrictions and of the potential dangers of not following the rules. Eating is allowed in a designated lunchroom area and in offices. Smoking is restricted to a designated smoking area.

Production Practice 2.2: Develop and implement plans and procedures for rapid and effective response to cyanide exposure.

The operation is in full compliance with Production Practice 2.2

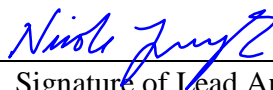
Summarize the basis for this Finding:

VLS maintains comprehensive Emergency Response Plans and procedures for rapid and effective response to cyanide exposure. The procedure for treatment of cyanide exposure is available for a medical emergency responder and the antidote response kit was being properly stored. The VLS emergency response plan was last updated in January 2012. Additionally, SGS maintains procedures and antidote in the event that there is a human exposure to cyanide during an emergency response event.

Commercially supplied combination shower / low-pressure eye wash stations were in use at the facility. ABC-type fire extinguishers and eye wash/shower units are located at the facility. The fire extinguishers and eye wash/shower units are checked monthly. Records were reviewed and were found to be complete.

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The facility has water, oxygen, resuscitator, antidote and a means of communication readily available at the facility. Emergency equipment is inspected on a monthly basis.

VLS and SGS appropriately maintain emergency response equipment and antidote to ensure their availability during an emergency. Recent records of equipment inspections were reviewed for both. The methods by which shelf-life medicines and antidotes are managed were also reviewed. Antidote is stored in locations that are temperature controlled. The medicine is stored in a manner that protects it from moisture and from light, as recommended by the manufacturer. Emergency response equipment is stored and tested according to manufacturer's recommendations.

Safety Data Sheets and first aid procedures are available to workers in operational areas. Safety procedures that describe how to respond to a cyanide exposure and how to use the medical kit were available.

Cyanide safety training is given annually and employees and supervisors demonstrated a good understanding of the decontamination policy and the need for safety precautions. Upon review of the operations, it was deemed to be highly unlikely that there would be a potential for skin exposure to cyanide. The safety training and procedures of the facility were found to be acceptable.

All medical treatment would be done by a licensed physician. The site maintains a medical response kit with instructions for use. The medical kit would be given to the doctor or brought to the hospital with an exposure victim to ensure availability of appropriate supplies to medical responders.

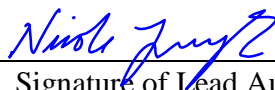
Trained medical emergency response personnel are readily available at the Port of Antwerp to transport an exposure victim to a qualified medical facility. The auditor concluded that there is no need for additional procedures to be developed by the facility.

The doctor who is responsible for medical exams and treatment in the event of an emergency visits the facility annually. Correspondence regarding the potential for cyanide exposure and treatment plans was reviewed from 2003 and 2006. Additionally the doctor monitors all employees for cyanides on an annual basis. Emergency response drills are conducted annually by SGS and VLS. Spill and exposure scenarios tested were deemed to be appropriate for the operations.

VLS and SGS have documented investigation and reporting requirements for any safety or environmental incident. According to interviews, procedures and practices would be extensively reviewed in the event of an incident.

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3. MONITORING : *Ensure that process controls are protective of the environment.*

Production Practice 3.1: *Conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.*

The operation is **in full compliance with Production Practice 3.1**

Summarize the basis for this Finding:

The facility does not have any requirements or demonstrated need to perform environmental monitoring. This part of the ICMC is therefore deemed to be not applicable at this time. The facility does not discharge directly or indirectly to surface water. There are no known spill or release events that could have impacted groundwater, soil, or air. There is no processing or handling of cyanide solution and there is no known generation of measurable quantities of hydrogen cyanide gas.

4. TRAINING: *Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.*

Production Practice 4.1: *Train employees to operate the plant in a manner that minimizes the potential for cyanide exposures and releases.*

The operation is **in full compliance with Production Practice 4.1**

Summarize the basis for this Finding:

VLS and SGS both have formal training programs that include safety training for the handling of hazardous materials prior to the start of work and periodic refresher training on all procedures. The training program discusses chemical hazards and safety precautions. VLS and SGS employees also received additional training and training materials from DuPont.

Personnel are trained on the use of personal protective equipment as part of the safety training and again during the on-the-job training.

Employees are trained to perform normal operation tasks to minimize risks to personal safety and the environment. Awareness of procedural requirements was evaluated through interviews. Employees showed very good awareness of procedural requirements for both normal and upset operating conditions.

All personnel are trained on all of the operating and safety procedures. Forklift drivers also receive specialized training in order to perform their jobs safely. Records were reviewed and were found to be complete.

Experienced and qualified personnel provide the safety and operations training. Interviews indicated that the cyanide-specific training at VLS is given by DuPont and the general safety training is given by the SHEQ Manager. SGS training is conducted internally by hazardous material experts.

All workers are trained prior to being allowed to work with cyanide. The buddy system is used for all operations and each new employee is monitored very closely prior to being allowed to complete tasks unsupervised. Training effectiveness is evaluated through observation of on-the-job performance by a qualified person.

Production Practice 4.2: Train employees to respond to cyanide exposures and releases.

The operation is in full compliance with Production Practice 4.2

Summarize the basis for this Finding:

VLS trains personnel on emergency response procedures and on what to do if a cyanide release is discovered. This is done as part of the regular safety training and emergency response training on the emergency response plan that is specific to each warehouse. Interviews with personnel showed acceptable awareness of procedures.

Drills are conducted annually to test general response to chemical emergencies, including chemical exposure. Corrective actions are processed and emergency procedures are revised as necessary following drill critiques.

Training records are maintained for at least as long as the employee is working at the site. Records were sufficiently detailed to be found conformant.

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

Production Practice 5.1: Prepare detailed emergency response plans for potential cyanide releases.

The operation is in full compliance with Production Practice 5.1

Summarize the basis for this Finding:

Emergency response services are provided by SGS. Although VLS has an emergency response plan in place to respond to potential releases of cyanide, the plan only calls for VLS employees to call SGS in the event of an upset condition or spill. The answers to the questions in this part of the ICMI protocol are combined for the VLS warehouse and the SGS emergency response services that are part of this Supply Chain.

VLS maintains emergency response plans for each warehouse building, as required by their operating permits. The emergency response plan for the building used to store sodium cyanide was last updated in January 2012.

SGS maintains an emergency response plan entitled "SHE Plan for UN 1689 (Cyanides)" that was last revised in January 2012. The plan is specific to the provision of emergency response services in the event of a sodium cyanide spill at the VLS warehouse or in the Port of Antwerp.

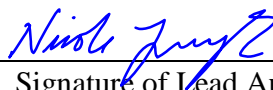
The emergency response procedures address plausible scenarios and were found to be appropriate for the operation. The emergency response plan and detailed support procedures for managing emergency situations fulfill all ICMC Emergency Response Plan requirements.

The emergency response procedures were reviewed with SGS and VLS personnel. The warehouse is located in an industrial Port. Only sodium cyanide in the solid form is stored at this warehouse. Specific response actions such as risk evaluation and careful containment and remediation steps are detailed in the emergency plans. Part of the evaluation procedure is to identify the source of the spill, and control the release of material at the source. Evaluations are done following the deployment of the emergency procedures to determine what may have caused the spill. Information learned from the event is used to facilitate the implementation of corrective measures to prevent future releases.

According to the emergency response plans and interviews, the cyanide antidote can only be administered by a trained doctor, who is readily available at the Port at all times. VLS maintains records that show that the doctor has been appropriately informed and involved in emergency planning for the warehouse.

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Production Practice 5.2: *Involve site personnel and stakeholders in the planning process.*

The operation is **in full compliance with Production Practice 5.2**

Summarize the basis for this Finding:

SGS holds safety meetings with its personnel multiple times per year. During these meetings employees are involved in the emergency planning process. Additionally, SGS holds risk evaluation meetings in the event that emergency responders are to be deployed. The risks and risk mitigation steps to be taken for each specific emergency event are discussed during such meetings.

Cyanide antidote can only be administered by a trained doctor, who is readily available at the Port at all times. VLS maintains records that show that the doctor has been appropriately informed and involved in emergency planning for the warehouse. Records were also available to demonstrate close interaction between Port emergency responders (e.g., fire and spill to surface water response) and SGS and VLS personnel.

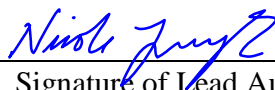
Coordination of roles and responsibilities between SGS and VLS personnel was evaluated through interviews held with personnel from each organization. Awareness of roles and responsibilities was very good.

The VLS warehouse is located in an industrial Port and only solid sodium cyanide is stored at this warehouse. VLS and SGS were able to demonstrate through interview and through communication records that they are in regular contact with Port and external emergency responders. Governmental permits to operate were issued with solid cyanide specifically mentioned, which was further evidence that local communities are aware of the presence of cyanide being stored in the warehouse.

Annual drills and training sessions are conducted with employees and drills with external stakeholders are conducted at least every three years. Emergency plans are evaluated after drills to confirm that they are accurate and continue to be suitable for the operation. Additionally, the SGS SHE Plan for UN 1689 emergency response calls for a reassessment of current conditions and risks each time the plan is deployed.

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Production Practice 5.3: *Designate appropriate personnel and commit necessary equipment and resources for emergency response.*

The operation is in full compliance with Production Practice 5.3

Summarize the basis for this Finding:

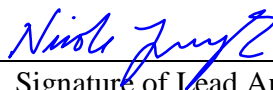
Primary Emergency Response Teams are identified and alternate coordinators are identified in the emergency procedures for VLS and SGS. The emergency response plan clearly designates full responsibility, authority, and duties for managing an emergency situation to coordinators and team members. Call-out procedures including 24-hour contact information for coordinators and response team members are included in the emergency planning documentation. Training for emergency responders was found to be appropriate. SGS personnel also receive additional training for responding to emergency situations at customer sites. Coordination of roles and responsibilities between SGS and VLS personnel was evaluated during this audit. Awareness of roles and responsibilities was very good.

Lists of necessary emergency response equipment are contained within the emergency planning documentation. SGS maintains an extensive supply of emergency response equipment in mobile units that can be deployed to a customer site. The equipment is regularly maintained and inspected. Frequencies for equipment inspections are defined and records showed that all equipment identified as necessary for cyanide spill response was available in the mobile unit and had been inspected at monthly intervals. Detailed checklists showing each piece of emergency response equipment are used to perform the inspections.

The processes for maintaining emergency equipment is also addressed in the VLS emergency response plan. Emergency equipment is checked at least monthly. Records and interviews during the VLS confirmed this practice.

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Production Practice 5.4: Develop procedures for internal and external emergency notification and reporting.

The operation is in full compliance with Production Practice 5.4

Summarize the basis for this Finding:

The notification procedures, including internal and external telephone numbers, are described in the emergency response procedures for both SGS and VLS. Notification numbers are checked at least annually.

Extensive notification information is also contained in the “Cyanides Global Response Plan for Off-Site Incidents.” For on-site emergencies at VLS, notifications are made to SGS emergency responders and to personnel within DuPont. The DuPont emergency response plans were last updated in 2011. Additionally, DuPont maintains emergency planning documentation that details steps to be taken for any incident, including contact with the Media.

Production Practice 5.5: Incorporate into response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.

The operation is in full compliance with Production Practice 5.5

Summarize the basis for this Finding:

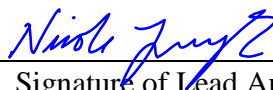
SGS maintains detailed procedures for the testing of potentially contaminated solids, the decontamination of solids, and the disposal of any waste following the remediation of a spill.

Additionally, DuPont maintains detailed procedures for the neutralization and decontamination of solids and contaminated debris. Additional details regarding the remediation, neutralization, decontamination, and disposal of clean-up debris are contained within the DuPont Global Emergency Response Procedures. Extensive descriptions of necessary action steps depending on the incident scenario are clearly outlined in the procedures.

Interviews with SGS, DuPont, and VLS personnel showed a high level of awareness that the use of treatment chemicals is prohibited if cyanide spills into surface waters. SGS personnel noted, however, that the use of any chemical treatment methods for spills into the waterways is strictly prohibited and that only authorized external responders from the Port of Antwerp are allowed to respond to a chemical spill that involves a spill into surface water.

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The DuPont emergency response plan prohibits the use of treatment chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide if cyanide spills into surface waters.

No cyanide solution is handled at this location and it is highly improbable that a spill of solid sodium cyanide onto concrete would result in a release requiring environmental monitoring. SGS provides DuPont and VLS with a full range of emergency response and remediation services that include testing and environmental monitoring, when required.

Production Practice 5.6: Periodically evaluate response procedures and capabilities and revise them as needed.

The operation is in full compliance with Production Practice 5.6

Summarize the basis for this Finding:

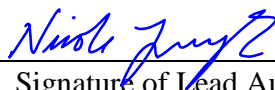
Both the VLS and SGS emergency procedures are reviewed at least annually to keep the plans up-to-date and confirm that the plans continue to be appropriate for the operation.

SGS and VLS perform internal emergency drills on an annual basis and emergency tests with external responders from the Port area every three years.

Full incident investigations are conducted by SGS in the event that an actual emergency occurs. Records were available to demonstrate this practice. Revisions to the emergency procedures were appropriately processed after such reviews.

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