



December 2014

ICMI RE-CERTIFICATION SUMMARY REPORT

Freight Forwarders Kenya Ltd

Submitted to:

International Cyanide Management Institute
(ICMI)
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UNITED STATES OF AMERICA

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REPORT

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1.0 SUMMARY AUDIT REPORT FOR TRANSPORTATION

Name of Cyanide Transportation Facility:	Freight Forwarders Kenya Ltd
Name of Facility Owner:	Freight Forwarders Group
Name of Facility Operator:	Freight Forwarders Kenya Ltd
Name of Responsible Manager:	Hafiz Noormohamed, Freight Forwarders Kenya Ltd
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2.0 LOCATION DETAIL AND DESCRIPTION OF OPERATION

2.1 Facility Location

Allied Wharfage Ltd (AWL) was formed in 1990 to provide warehousing and related services and is a wholly owned company of FFK. Transeast is a subsidiary of FFK who is also its key customer.


AWL's interim storage facility is located off Magongo Road in the Chagamwe district of Mombasa approximately seven kilometres (km) to the northwest of the Port of Mombasa and 11 km to the northwest of the city of Mombasa at coordinates -4.009887 +39.601057. The interim storage facility is close to the main Nairobi highway and Moi International airport. The facility covers an area of 7,972 m² (1.97 acres) and is a roughly rectangular in shape with an entrance gate on the northern boundary. The interim storage facility holds bonded, transit and local cargos and is owned and managed by AWL.

Shipping containers containing cyanide are held in the interim storage facility while customs documents are obtained (as the cyanide shipments are delivered to North Mara mine, in Tanzania, the cargo is considered bonded cargo (tax free)). In addition, clearance has to be given from the mine that the last section of road is in good order as this section of road may be affected by heavy rains. Shipments may therefore be held in AWL's facility for up to two weeks. The shipping containers are never opened and the cyanide is not repackaged in any way. There was no cyanide present at the time of the audit.

The cyanide containers are handled by a Terex reach stacker. Clearing and forwarding services for AWL are undertaken by its principal company FFK, while transportation is undertaken by its group associated company, Transeast Ltd (Transeast).

Transeast's premises are located along the Mombasa – Nairobi highway, 2 km from *Mazeras* centre. The entrance gate is approximately 100 m from the highway. The company specialises in the transport of regular containerised cargo, bulk cargo, out of gauge cargo and dangerous goods within the east and central African region.

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Transeast transports all cyanide for FFK. They utilise a fleet of well-maintained trucks with assorted trailers to move cargo from the Port of Mombasa to its various client destinations.

Cyanide is transported from AWL's interim storage facility along the Mombasa to Nairobi highway and through the Isebania border point into Tanzania. From the border, the cyanide is transported to the mine customer for offloading. Cyanide is delivered to African Barrick Gold's North Mara mine, a distance of 1,079 km taking 5 days (with 2 days wait at the border).

2.2 Background

Freight Forwarders Kenya Ltd (FFK) was incorporated in 1973 following the amalgamation of three clearing and forwarding agents namely Kenya General Agency Ltd, Reynolds and Co Ltd and Wafco Ltd.

FFK became a Signatory to the Code in November 2007 and was certified as being fully compliant with the Code on 27 May 2008 and re-certified in September 2011.

FFK is a member of the Kenya International Clearing, Forwarding and Warehousing Association and was a founder member of the Association's predecessor, the Kenya Clearing, Forwarding and Warehousing Association.

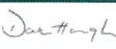
With over 30 years of experience, FFK has developed a network of subsidiaries and agents enabling the organisation to offer the following range of Clearing, Forwarding and Logistics services:

- Customs clearance;
- Marine services;
- Warehousing.
- Transportation;
- Procurement services;
- Communications; and
- Transportation.

FFK has a close working relationship with Freight Forwarders Tanzania Ltd (FFT) and both are part of Freight Forwarders Group (FFG).

FFK transports solid sodium cyanide as supplied by Samsung and packaged in heavy duty plastic bags inside nylon bulk bags which are packaged into UN approved wooden boxes within 20 foot shipping containers. At the time of the audit, FFK delivered to one client site within Tanzania.

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SUMMARY AUDIT REPORT

Auditors Findings

in full compliance with

Freight Forwarders Kenya Ltd is: in substantial compliance with

The International Cyanide Management Code

not in compliance with

This operation has maintained full compliance with the International Cyanide Management Code throughout the previous three-year audit cycle.

Audit Company: Golder Associates

Audit Team Leader: Dale Haigh, Lead Auditor and Technical Specialist

Email: dhaigh@golder.com

Name of Other Auditors

Name, Position	Signature
Ed Perry, ICMI Pre-certified Auditor	

Dates of Audit

The Certification Transport Audit was undertaken within one day (one person-day) on 22 September 2014.

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

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Date

Freight Forwarders Kenya Ltd
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D. Haigh
Signature of Lead Auditor

18 December 2014
Date





PRINCIPLE 1 – TRANSPORT

Transport Cyanide in a Manner that Minimizes the Potential for Accidents and Releases

Transport Practice 1.1: Select cyanide routes to minimize the potential for accidents and releases.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in Full Compliance with Transport Practice 1.1; select cyanide transport routes to minimize the potential for accidents and releases.

FFK, with its sub-contractors Transeast and AWL have implemented a procedure for transport route selection to minimise potential for accidents and releases, in an environment where there are limited practical alternative transport routes.

The transport routes have been periodically reviewed (between 2011 and 2014) and analysed for risks and restrictions. Numerous actions have been identified and implemented during the reviews to improve safety. Drivers assess and report on conditions during each trip.

FFK/Transeast, its clients and suppliers have consulted various stakeholders and applicable governmental agencies as necessary (during the period 2011 to 2014) in the selection of routes and development of cyanide management measures.

Convoys are used for every cyanide delivery as a means of managing the risks of the road conditions (e.g., traffic and people, poor road conditions). Each convoy is led by a support vehicle which is fitted with signs and flags, all vehicles use dipped headlights.

FFK/Transeast largely manages its own emergency response but contacts emergency support (police and hospitals) along the route each year. These stakeholders have been consulted on cyanide and advised of their roles during an emergency.

FFK subcontracts the transport of cyanide to Transeast and the interim storage of cyanide to AWL under Service Level Agreements. The Service Level Agreements require Transeast and AWL to comply with the ICMI. FFK has developed an audit protocol to assist in the subcontractor performance assessment.

Transport Practice 1.2: Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with 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.



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FFK subcontracts the transport of cyanide to Transeast and the interim storage of cyanide to AWL under Service Level Agreements. The Service Level Agreements require Transeast and AWL to comply with the ICMC. FFK has developed an audit protocol to assist in the subcontractor performance assessment.

Transeast have only used trained and competent operators to drive its trucks (during the period between 2011 and 2014).

AWL, only uses trained and competent operators to drive its Reach Stacker within its Interim storage facility.

FFK, Transeast and AWL maintain files on their drivers that contain copies of licences (heavy vehicle drivers licences) and training records.

There is no requirement in Kenya and Tanzania for drivers to be licensed for dangerous goods transport, although these convoys can travel through Tanzania where there is a need. Kenya and Tanzania are both in the East African Community (EAC) where all members driving licences are accepted in each country. All personnel from FFK, Transeast and AWL operating cyanide handling and transport equipment have been trained to perform their jobs in a manner that minimises the potential for cyanide releases and exposures. The training of cyanide handling and transport equipment operators is completed each year. Records show that such training continued during the period 2011 to 2014.

Interviews with drivers at FFK, Transeast and AWL indicated that all FFK and subcontractor personnel operating cyanide handling and transport equipment are competent to perform their jobs in a manner that minimises the potential for cyanide releases and exposures.

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

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 1.3; ensure that transport equipment is suitable for the cyanide shipment.

FFK and its subcontractors Transeast and AWL only use equipment designed and maintained to operate with the design loads.

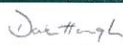
Transeast and its trailer suppliers (Nelion Trading Limited) have determined that the maximum trailer loading capacity for the trailers they use for cyanide loads is 45 tonnes. Orica/Samsung supply cyanide containers of around 23 tonnes weight which is well within the capacity of the trailers. FFK with Transeast also ensure that each trailer only carries one container. The gross weight (trailer and load weight) allowed on Kenyan road is 48 tonnes and the loaded trailers are well below this limit.

Transeast obtain trailer loading certificates from the Kenyan Government for all of its trailers. All examples seen show that the trailers are allowed to carry loads over 31 tonnes.

FFK and its subcontractors have procedures in place to verify the adequacy of the equipment for the load it must bear and its fitness for purpose. FFK has performed daily vehicle checks during the convoys carried out between 2012 and 2014, and these are documented. Transeast also have routine maintenance schedules and ad hoc maintenance procedures that include checks for structural problems on the vehicles. These checks were performed during the period 2012 to 2014. Transeast and AWL maintain records of vehicle specifications and maintenance history.

FFK and its subcontractors have procedures in place to prevent overloading of the transport vehicles being used for handling cyanide. Transeast have sufficient vehicles of appropriate capacity to ensure that no other

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vehicles (without sufficient capacity) are used. The procedures and inspections carried out ensure that only one cyanide container is loaded and that no other material is added to the vehicles.

FFK subcontracts the transport of cyanide to Transeast and the interim storage of cyanide to AWL under Service Level Agreements. The Service Level Agreements require Transeast and AWL to comply with the ICMC. FFK has developed an audit protocol to assist in the subcontractor performance assessment and these have been applied during the period 2012 to 2014.

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

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 1.4; develop and implement a safety program for transport of cyanide.

FFK along with its subcontractors Transeast and AWL, has implemented procedures (between 2012 and 2014) which have ensured that the cyanide is transported in a manner that maintains the integrity of the packaging. These include ensuring that containers are securely attached to the trailers using twistlocks and frequent inspection that the secure attachment remains in place during the convoy.

Local signs are used by FFK/Transeast to identify shipments as containing cyanide for each convoy. These signs are attached to the lead vehicles and all cyanide containing vehicles. In addition, the vehicles carry red flags and dipped headlights are used. The signage is inspected prior to starting the convoy and at various stops each day as the convoy progresses.

Equipment consists of road vehicles (trailers) that were purchased to a design specification appropriate to carry the cyanide containers (see 1.3.3). FFK has developed a Safety Program which is implemented in conjunction with its subcontractors Transeast and AWL. This includes vehicle inspections prior to each shipment and preventive maintenance activities. Limitations on driver hours are also managed; locally through use of Convoy Leaders who ensure that driver hours are limited each day, and through the use of the GPS system which also monitors driver hours. Procedures have been implemented to prevent loads from shifting through the use of twistlocks. Procedures are also in place for modifying or suspending travel during severe weather and the Convoy Leaders assess conditions and can take appropriate action.

FFK and its sub-contractors also have a drug prevention policy. Records are maintained for all aspects of the Safety Program.

FFK subcontracts the transport of cyanide to Transeast and the interim storage of cyanide to AWL under Service Level Agreements. The Service Level Agreements require Transeast and AWL to comply with the ICMC. FFK has developed an audit protocol to assist in the subcontractor performance assessment and such audits were performed during the period 2012 to 2014.

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

in full compliance with

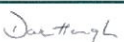
The operation is

in substantial compliance with

Transport Practice 1.5

not in compliance with

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Summarise the basis for this Finding/Deficiencies Identified:

No cyanide is transported by sea or air and therefore this principle is not applicable.

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

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.6

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

FFK is in Full Compliance with Standard of Practice 1.6 requiring the operation to track cyanide shipments to prevent losses during transport.

FFK subcontracts the transport of cyanide to Transeast and the interim storage of cyanide to AWL under Service Level Agreements. The Service Level Agreements require Transeast and AWL to comply with the ICMC. FFK has developed an audit protocol to assist in the subcontractor performance assessment and these audits have been implemented during the period 2012 to 2014


FFK, through its sub-contractors Transeast and AWL has effective means of communication with their transport vehicles. Communication systems include GPS tracking which is used for all cyanide shipments; the use of long-range cell phones which are continuously on and satellite phones. All communication equipment is checked prior to the start of each convoy, during the convoy pre-checks and at various points each day.

There are no communication blackout areas within Kenya on the transport routes used by Transeast.

FFK has systems to track the progress of cyanide shipments. Transeast utilise a GPS system (which is continuously monitored) to track progress along the routes while FFK also log convoy movements using telephone text messaging, which are also recorded. All information is shared between the parties.

FFK has appropriate inventory controls and chain of custody documentation to prevent loss of cyanide during shipment. Vehicles are weighed at weighbridge stations along the route which verifies that no material is lost. All trucks carry a material safety datasheet for sodium cyanide in Swahili and English.

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PRINCIPLE 2 – INTERIM STORAGE

Design, Construct and Operate Cyanide Trans-shipping Depots and Interim Storage Sites to Prevent Releases and Exposures.

Interim Storage

Practice 2.1: Store cyanide in a manner that minimizes the potential for accidental releases.

in full compliance with

The operation is in substantial compliance with **Interim Storage Practice 2.1**

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 2.1; store cyanide in a manner that minimizes the potential for accidental releases.

The AWL interim storage facility is secured to prevent unauthorised access to cyanide, has appropriate warning signs (no smoking, eating and drinking, no naked flames and PPE requirements).

Incompatible materials such as acids, strong oxidisers and explosives are stored at a distance of more than 10 m from any cyanide held at the AWL interim storage facility.

The cyanide is stored within shipping containers that are designed to minimise the potential for contact of solid cyanide with water.

The cyanide is stored with adequate ventilation to prevent build-up of hydrogen cyanide gas, the shipping containers are not opened while in storage and they are stored outside on a hardstand area.

Systems and resources are in place at the interim storage site to contain and remediate any spilled cyanide materials and minimise the extent of a release.



PRINCIPLE 3 – EMERGENCY RESPONSE

Ensure that Process Controls are Protective of the Environment.

Emergency Response

Practice 3.1:

Prepare detailed emergency response plans for potential cyanide releases.

in full compliance with

The operation is

in substantial compliance with

Emergency Response Practice 3.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.1; prepare detailed emergency response plans for potential cyanide releases.

FFG have a document entitled Cyanide Procedures that contains all of the details of how to respond in an emergency that involves cyanide.

The Cyanide Procedures document has been adapted by FFG from Orica Australia Limited's (Orica) Emergency Response Guide. The Orica Emergency Response Guide provides guidance in the development of specific site and transport route emergency response plans for the management of incidents involving spillage of sodium cyanide product. The document has been modified by FFG to suit the conditions of East and Central Africa.

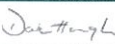
The Cyanide Procedures document has been developed to be appropriate for the selected transportation routes and interim storage facility, transport infrastructure, the physical and chemical form of cyanide and the design of the transport vehicle.

The Cyanide Procedures cover specific circumstances where they will be used. The document includes Emergency Response Guides for specific scenarios including:

- RG1 Dry Sodium Cyanide Spill inside interim storage facility;
- RG2 Dry Sodium Cyanide Spill outside interim storage facility;
- RG3 Dry Sodium Cyanide Spill Inside a Sea Container;
- RG4 Sea Container Decontamination;
- RG5 Handling Wet Sodium Cyanide;
- RG6 Dry Sodium Cyanide Spill to a Waterway;
- RG7 Decontamination of a Spill of Solid Cyanide into Soil; and
- RG8 Response to an Incident with a Fire Involving Sodium Cyanide.

External responders identified in the documents are aware of their role in an emergency.

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Emergency Response

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

in full compliance with

The operation is in substantial compliance with **Emergency Response Practice 3.2**

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.2; designate appropriate response personnel and commit necessary resources for emergency response.

The operation is in full compliance with Transport Practice 3.2; designate appropriate response personnel and commit necessary resources for emergency response.

Transeast and AWL provide the same training to their respective employees which is given by Transeast's Health and Safety Officer. All drivers transporting cyanide, AWL facility operators including handling equipment operators and banksmen receive the Cyanide Awareness course and the drivers received the Cyanide Convoy Procedures course.


The Cyanide Procedures identify the key roles and responsibilities in the event of an emergency for the following positions:

- Cyanide Code Manager;
- Cyanide Convoy Leader;
- Emergency Response (ER) Truck Driver;
- Convoy Lead Drivers;
- Local Authorities;
- Interim Storage Yard Supervisor; and
- Interim Storage Yard Worker.

The requirements are clear and unambiguous and are also covered in the training programmes.

All emergency response equipment is taken in an Emergency Response vehicle as no other equipment is available en-route. A list of emergency response equipment is documented on a checklist. The equipment is checked before every convoy of vehicles leaves. The lists were viewed during the audit. In addition to the emergency response vehicles all drivers are issued with a "Get out alive" kit bag when the convoy assembles that includes essential PPE and an MSDS for sodium cyanide.

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Emergency Response

Practice 3.3:

Develop procedures for internal and external emergency notification and reporting.

in full compliance with

The operation is

in substantial compliance with

Emergency Response Practice 3.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.3; develop procedures for internal and external emergency notification and reporting.

The Emergency Call List and General Emergency Response sections of the Cyanide Procedures contain details on how the emergency response procedures are activated including details of who is contacted.

The procedure requires the following companies to be contacted in the event of an incident:

- FFK;
- Orica ;
- Emergency services (police and medical providers);
- NEMC (when in Tanzania);
- GCLA (when in Tanzania);
- Client (mine);

The relevant contact details for parties identified are provided in the Emergency Call List of the Cyanide Procedures. It contains information on contact names and positions within the respective organisations as well as office numbers and mobile numbers.

A test of the telephone numbers of the internal and external responders is undertaken annually to update the latest contact sheet. An Awareness Campaign was undertaken in September 2014, which was also used to update contact numbers.

Emergency Response

Practice 3.4:

Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

in full compliance with

The operation is

in substantial compliance with

Emergency Response Practice 3.4

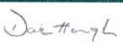
not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.4; develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

The Emergency Response Guide RG 6 Dry Sodium Cyanide Spill to a Waterway (part of the Cyanide Procedures) states that "FFT, FFK & Orica Mining Chemicals subscribe to the recommendations of the

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International Cyanide Management Code in that no chemicals are to be added to a flowing waterway in the event of a cyanide spill as these may only exacerbate the situation with their own toxicity characteristics.”

RG 7 'Decontamination of a Spill of Solid Cyanide into Soil' (part of the Cyanide Procedures) recommends the use of sodium hypochlorite for use where there has been contamination of the soil.

Ferrous sulphate and hydrogen peroxide are not carried by the convoy as part of their spill kit.

Emergency Response

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

in full compliance with

The operation is in substantial compliance with **Emergency Response Practice 3.5**

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.5; periodically evaluate response procedures and capabilities and revise them as needed.

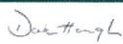
The Cyanide Procedures contains provisions for periodically reviewing and evaluating its adequacy and they are being implemented.

In addition to this the Review and Audit Process Section of the Cyanide Procedures states that the responsible people are required to coordinate a review at least annually, and after any of the following resulting from or affected by the transportation of cyanide:

- Incidents;
- Emergencies;
- Emergency exercises; and
- Transportation audits and assessments.

A full scale incident scenario was undertaken on 16 October 2013 jointly between FFK and Transeast. The drill was undertaken 1 km from the centre of Maungu along the Mombasa highway with the transportation of one 20 tonnes shipping container to North Mara Mine. The drill simulated the driver being affected by cyanide.

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Report Signature Page

GOLDER ASSOCIATES (UK) LTD

Dale Haigh
Lead Auditor/Transportation Technical Specialist

Sophie Wheeler
Project Manager/Reviewer

Date: 18 December 2014

DH/EP/SW/pr

Company Registered in England No. 1125149

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VAT No. 209 0084 92

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