



December 2014

ICMI RE-CERTIFICATION SUMMARY REPORT

Freight Forwarders Tanzania Ltd. Dar es Salaam, Tanzania

Submitted to:

International Cyanide Management Institute
(ICMI)
1400 I Street, NW - Suite 550
Washington, DC 20005
UNITED STATES OF AMERICA

Freight Forwarders Tanzania Ltd
PO Box 179
Dar es Salaam
Tanzania

REPORT

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1.0 SUMMARY AUDIT REPORT FOR TRANSPORTATION

Name of Cyanide Transportation Facility:	Freight Forwarders Tanzania Ltd
Name of Facility Owner:	Freight Forwarders Group
Name of Facility Operator:	Freight Forwarders Tanzania Ltd
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2.0 LOCATION DETAIL AND DESCRIPTION OF OPERATION

2.1 Facility Location

The FFT Mbagala Storage Facility is located off Kilwa Road in the Mbagala industrial area in the south part of Dar es Salaam airport at coordinates 6°54'42.10"S - 39°16'0.61"E. It has an access road and entrance along the eastern boundary and borders the Mainline Carriers Yard on the western boundary. The storage facility contains a dedicated area for the interim storage of cyanide containers; this has only taken place at this location for the last 18 months. At the time of the site visit cyanide containers were being held at this facility.

Golden Coach Ltd (GCL) became a Signatory to the International Cyanide Management Code on 27 May 2014 as part of the repeated requests by companies other than FFT to transport Cyanide to mines not serviced by FFT.


With their sister company, Golden Fleet Ltd (GFL) they have been in operation for over 30 years and are located off Nelson Mandela Road at coordinates 6°50'59.57"S - 39°15'49.21"E in Dar es Salaam. GCL and GFL are separate companies with separate agreements with FFT. However, they operate out of the same location, using the same management team, vehicles and trailers. GFL act as a subcontractor to GCL with regards to the transport of cyanide with GFL providing some of the trucks and drivers. GCL's main client is Freight Forwarders Tanzania Ltd.

2.2 Background

FFT became a Signatory to the Code in November 2007 and was certified as being fully compliant with the Code on 22 May 2008 and was recertified in 2011.

FFT coordinates cyanide transportation within Tanzania, and subcontracts the trucking component of transportation to Golden Coach Limited/Golden Fleet Limited (GCL/GFL) and Mainline Carriers Limited (MCL).

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FFG has been transporting cyanide since 1998 when large scale gold mining started in Tanzania. Initially the transportation was by rail as the roads were of a poor standard. In 2003 the transportation switched to road due to infrastructure improvements and has remained so since that time.

Solid Sodium Cyanide manufactured by Orica Australia Limited (Orica), Australia Gold Reagents (AGR) and Samsung Construction & Trading (SCT) in Korea, is packaged in Intermediate Bulk Containers (IBC), which are in turn packed into a container. The containers contain 17 to 20 1.1 ton IBCs – depending on client requirements and are delivered by ship to the Port of Dar es Salaam, Tanzania. The port is operated by the Tanzania Ports Authority (TPA).

At the Port of Dar es Salaam, the containers are unloaded using dockside container handling equipment by the Tanzania International Container Terminal System (TICTS).

In a cooperative effort between FFT, the Transporters and TICTS, the containers are arranged in a group, away from other dangerous goods while customs and import documents are cleared.

Once documentation is completed (between four and eight days), a convoy assembles and enters the TICTS area for loading. Following a risk assessment, cyanide is loaded at night for transfer to the interim storage yards so that traffic and people are at a minimum.

The convoy comprises a lead vehicle (crew-cab pick-up), the required number of semi-trailer trucks (between 5 and 16), and finally the Cyanide Emergency Spill Response vehicle. Prior to loading, each truck is checked for roadworthiness by the Convoy Leader using a check sheet for guidance. Each driver is also assessed to ensure that his training record is up-to-date, as there is a requirement for training to be updated on an annual basis.

One container is loaded on each trailer using the TICTS container stacker. During this operation, each container is checked for damage and the seals are noted as being correct and in place. An extra security plate arrangement is placed between the container and the trailer during loading. This security plate arrangement ensures that even if the seals are broken the doors of the container cannot be opened.


Once loaded the convoy of trucks with the escort vehicles departs the TICTS area and the Port. The Convoy travels to one of two vehicle depots, either the GCL vehicle yard or the FFT storage facility.

If a convoy is scheduled to travel directly to the client or if loading takes place overnight or finishes after 15:00, either the GCL yard on Mandela Road or the FFT Yard in Mbagala are used for overnight parking and the drivers go home and rest until the following day. This is as per FFT's and GCL's procedure for overnight storage to avoid travelling in the hours of darkness and is also part of the Fatigue Management Plan. The convoy then departs the yard the following morning.

If the Cyanide is scheduled to be stored for later transport to the client, the FFT Mbagala yard is used as an Interim Storage Facility and the containers are offloaded by a container handler and stacked in a designated area within the yard. The containers will be re-loaded at a later time for transport to the client sites. At that time, the same procedures for driver training, truck roadworthiness and container integrity are used as in the TICTS area.

Convoys usually leave the city of Dar es Salaam for client sites early in the morning, following a pre-convoy toolbox meeting held by the Convoy Leader.

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Convoys only operate during daylight hours, 06:00 and 18:00, to limit driver fatigue and ensure that should there be an incident there is some daylight remaining to effect immediate first response. To minimize stoppages the transporter usually has at least two less critical Non-Cyanide Loads travel with the convoy. In the event of a rig breakdown the rig from one of these loads can be switched with the broken down rig allowing the cyanide containers to continue to the client site with the non-cyanide load remaining to be collected later. Once at a client site, the cyanide containers are offloaded by the client.

Routes to the Client sites have been route risk assessed and the most suitable routes selected. The condition of transport infrastructure from the Port of Dar es Salaam to the mine site locations varies greatly, ranging between high quality sealed roads, sections of tarmac in poor condition to gravel/dirt roads in poor condition.


At the time of the audit, FFT delivered to five client sites within Tanzania and two in Democratic Republic of Congo (DRC). If required they are also able to deliver to North Mara mine; normally serviced by Freight Forwarders Kenya Limited as shown in Table 1.

Currently FFT deliver to five client sites within Tanzania.

Table 1: Mines delivered to by FFT

	Client	Supplier	Distance	Travel Time
1	Shanta Mining - Shanta Mine	SCT	980 Km	3-4 Days
2	<i>Resolute - Golden Pride Mine</i>	<i>AGR</i>	<i>Discontinued in Jan 2014</i>	
3	Barrick - North Mara Mine	Orica	1,450 Km	4-5 Days
4	Barrick - Buzwagi Mine	Orica/SCT	1,030 Km	3-4 Days
5	Barrick - Bulyanhulu Mine	Orica/SCT	1,120 Km	3-4 Days
6	AngloAshanti - Geita Gold Mine	AGR	1,170 Km	3-4 Days
7	Banro - Bukavu for Twangiza	Orica	1,930 Km	9-11 Days
8	Banro - Namoya Mine	Orica	1,980 Km	11-14 Days

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SUMMARY AUDIT REPORT

Auditors Findings

in full compliance with

Freight Forwarders Tanzania 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 23 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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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.

[X] 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.

FFT, with its carriers GCL, GFL and MCL and clients have implemented a procedure for the 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 and numerous actions were identified and implemented to improve safety. Drivers assess and report on conditions during each trip. FFT, 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 delivery as a means of managing the risks of the road conditions (traffic and people, poor road conditions). Each convoy is led by a support vehicle and fitted with warning signs and flags.

FFT largely manages its own emergency response but contact emergency support (Police and Hospitals) along the route each year. These stakeholders were consulted on cyanide and advised of their roles during an emergency.

FFT subcontracts the transport of cyanide to MCL, GCL and GFL under Service Level Agreements. The Service Level Agreements require MCL and GCL/GFL to comply with the ICMC. FFT has developed an audit protocol to assist in the subcontractor performance assessment and this has been used through the period 2011 to 2014.

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.

[X] 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.





FFT does not own and operate transport trucks directly. FFT does however manage the Mbagala interim storage facility and within this storage facility, FFT only uses trained and competent operators to drive its fork lift trucks within its interim storage yard. FFT sub-contracts the driving of trucks carrying cyanide to GCL/GFL and MCL. Both GCL/GFL and MCL have only used trained and competent operators to drive its trucks (during the period between 2011 and 2014) and the companies maintain files on their drivers that contain copies of licences (heavy vehicle drivers licences) and training records. FFT maintains copies of the files on drivers used by its subcontractors.

There is no requirement in Tanzania for drivers to be licensed for dangerous goods transport. However, all personnel from FFT, MCL and GCL 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 coordinated by FFT. Records show that such training continued during the period 2011 to 2014.

Interviews with drivers at FFT, MCL and GCL/GFL indicated that all FFT 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.

FFT subcontracts the transport of cyanide to MCL, GCL and GFL under Service Level Agreements. The Service Level Agreements require MCL and GCL/GFL to comply with the ICMC. FFT has developed an audit protocol to assist in the subcontractor performance assessment and this has been used through the period 2011 to 2014.

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.

FFT and its subcontractors MCL and GCL only use equipment designed and maintained to operate with the design loads.

FFT has procedures in place to verify the adequacy of the equipment for the load it must bear and its fitness for purpose. FFT has performed daily vehicle checks during convoys carried out between 2011 and 2014, and these are documented. MCL and GCL subcontractors 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 2011 to 2014. Both MCL and GCL/GFL maintain records of vehicle specifications and maintenance history. FFT has performed maintenance checks on the forklift truck which is of sufficient capacity to lift full cyanide containers.

FFT has procedures in place to prevent overloading of the transport vehicles being used for handling cyanide. MCL and GCL/GFL trucks and trailers were purchased to a design specification appropriate for the cyanide transport task.

Both MCL and GCL/GFL have sufficient vehicles for transporting cyanide to ensure that no other vehicles are used. In addition, the load limits of the containers, the axle loadings allowed for the vehicles and the vehicle design specifications ensure that the vehicles will not be overloaded. The procedures and inspections carried out ensure that only one cyanide container is loaded and that no other material is added to the vehicles.



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.

FFT has implemented procedures (between 2011 and 2014) which have ensured that the cyanide is transported in a manner that maintains the integrity of the packaging by its subcontractors. These include ensuring that containers are securely attached to the trailers using twist locks and frequent inspection that the secure attachment remains in place during the convoy.

Signs have been also used by FFT by its subcontractors 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 that were purchased to a design specification appropriate to carry the cyanide containers by FFT's subcontractors. FFT has developed a Safety Program which is implemented in conjunction with its subcontractors MCL and GCL. 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 followed to prevent loads from shifting. Procedures are also in place for modifying or suspending travel during severe weather and the convoy leaders assess conditions and can take appropriate action.

FFT and its sub-contractors have drug prevention policies. Records are maintained for all aspects of the Safety Program.

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

Summarise the basis for this Finding/Deficiencies Identified:

The operation does not involve shipment by sea or air and so Transport Practice 1.5 does not apply.

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

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The operation is in full compliance with Transport Practice 1.6; track cyanide shipments to prevent losses during transport.


Through its sub-contractors MCL and GCL/GFL, FFT has effective means of communication with their transport vehicles. Communication systems include GPS tracking which is used for all cyanide shipments; the use of satellite and long-range cell phones which are continuously on. All communication equipment is checked during the convoy pre-checks prior to the start of each convoy.

Communication risk areas only relate to small areas where the cell phone may not have a signal, although coverage throughout Tanzania is generally good, but a satellite phone is carried as back up should the signal fail.

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

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

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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 Mbagala interim storage facility is secured to prevent unauthorised access to cyanide, and has appropriate warning signs alerting workers (no smoking, eating and drinking in the cyanide storage area, no naked flames in the cyanide storage area, and PPE requirements). Incompatible materials such as acids and strong oxidisers are stored more than 10 m from the cyanide interim storage area. No explosives are stored at the Mbagala interim storage facility.

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

The shipping containers are not opened while in storage and they are stored outside on an area of hardstanding.

Systems and resources are in place on the site to contain and remediate any spilled cyanide materials and minimise the extent of a release. No incidents have occurred in the last 3 years.





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.



Emergency Response

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

[X] 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.

Both FFT and subcontractors MCL and GCL/GFL provide the same training to their respective employees, provided by the HSE and Training Manager for GCL/GFL and MCL. The emergency response training is given to all appropriate personnel. All drivers transporting cyanide receive a Cyanide Awareness course which is then followed periodically by Cyanide Convoy Procedures.

The Cyanide Procedures document identifies 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 the Emergency Response vehicles as no other equipment is available en-route. A list of emergency response equipment is documented on a checklist. The equipment is checked and tested before every convoy of vehicles leaves. 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 written in Swahili.

Emergency Response

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

[X] 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.

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Systems are in place to ensure that internal and external emergency contact information and reporting procedures are kept current.

The Emergency Call List and Plan Activation sections of the Cyanide Procedures document contain details on how the emergency response procedures are activated including details of who is contacted. This includes emergency personnel, internal personnel, the shipper, the receiver and the regulatory authorities.

A test of the numbers of the internal and external responders is undertaken annually through a Community Awareness road trip and the Cyanide Procedures updated in response to this.

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 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;

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

A full scale incident scenario was undertaken on 13 June 2014 jointly between FFT and GCL. The Cyanide Emergency Drill Report for this was observed.

The drill involved a simulated vehicle incident and associated cyanide spill. The drill took place on one truck in a 16 truck convoy. The drill involved Morogoro Regional Police. Following the drill the write up included areas where improvements could be made which included additional training requirements. Since the drill a number of these training requirements have been undertaken and others are planned.

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GOLDER ASSOCIATES (UK) LTD

Dale Haigh
Lead Auditor/Transportation Technical Specialist

Sophie Wheeler
Project Manager/Reviewer

Date: 18 December 2014

DH/EP/SW/pr

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