



**REPORT**

# International Cyanide Management Code

*Lynx Logistics, Ivory Coast Supply Chain Certification Audit,  
Summary Audit Report*

Submitted to:

**International Cyanide Management Institute (ICMI)**

1400 I Street, NW Suite 550  
Washington, DC 20005  
UNITED STATES OF AMERICA

**Marc Moukarzel, Operations Manager**

Lynx Logistics  
ABIDJAN  
Ivory Coast

Submitted by:

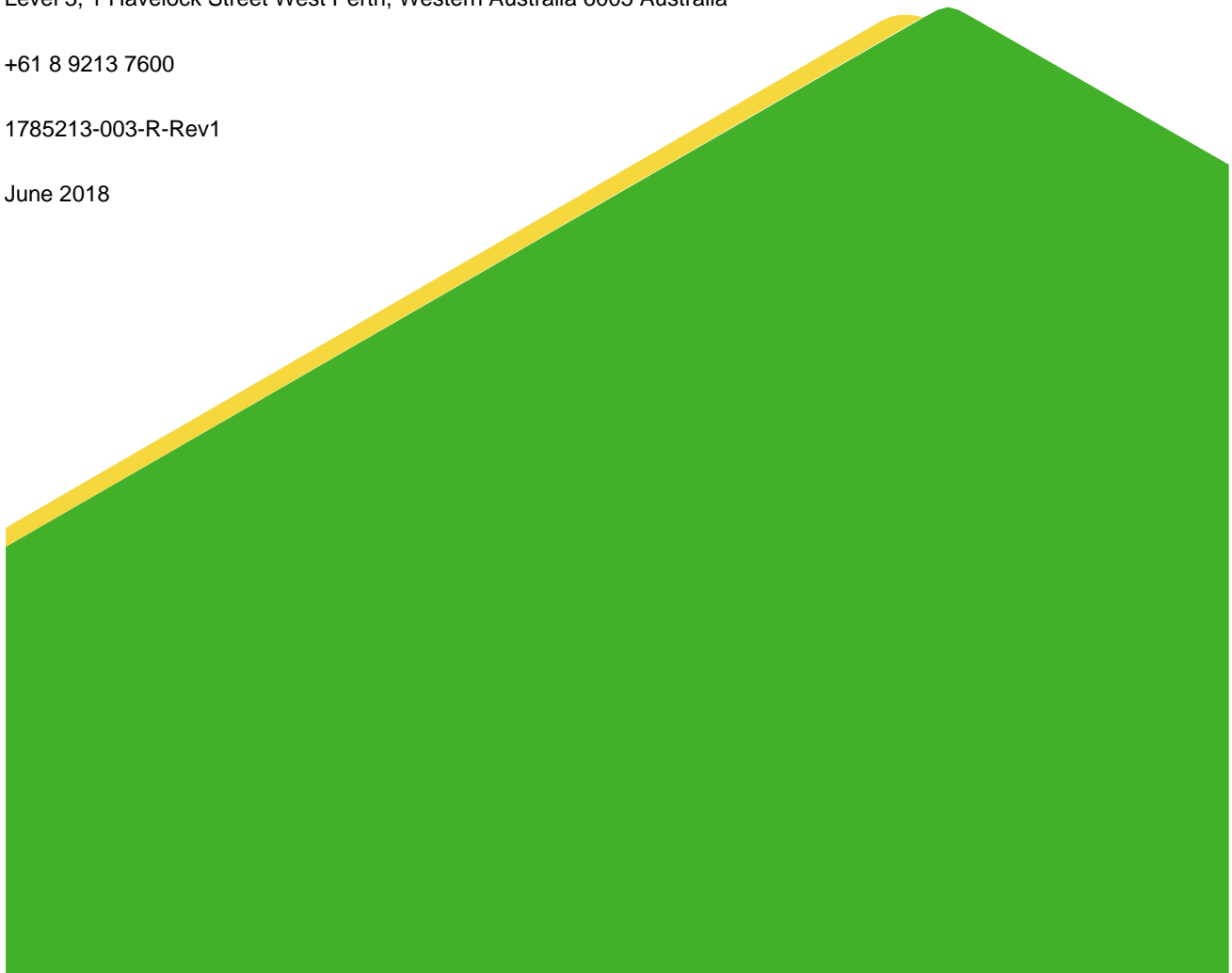
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## Distribution List

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**APPENDICES**

**APPENDIX A**  
Important Information

## 1.0 INTRODUCTION

### 1.1 Operational Information

<b>Name of Transportation Facility:</b>	Lynx Logistics
<b>Name of Facility Owner:</b>	Not Applicable
<b>Name of Facility Operator:</b>	Lynx Logistics
<b>Name of Responsible Manager:</b>	Marc Moukarzel, Operations Manager
<b>Address:</b>	26 BP 1261 Abidjan 26, Ivory Coast
<b>State/Province:</b>	Abidjan
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## 2.0 CYANIDE TRANSPORTATION

### 2.1 Audit Scope

The scope of this Transportation Certification Audit is the road transportation of solid cyanide by Lynx Logistics (Lynx) from the Port of Abidjan to customers in West Africa.

### 2.2 Lynx Logistics Road Transportation

Lynx is an Ivorian Limited Company operating as Forwarder, Shipping agent, Stevedore and Land Carrier. Lynx has been registered under the trade register number 1709801N from 7 April 2017, but the team's company started its activities 20 years earlier, on 1 October 1997, with Trident Shipping.

The Lynx Head Office is in the Industrial Zone of Yopougon, 26 BP 1261 Abidjan 26, Ivory Coast in its own building on an area of 500 m<sup>2</sup>. Lynx transports hazardous materials and general goods serving Mali, Ivory Coast, Burkina Faso and Ghana.

Currently, Lynx Logistics transports solid sodium cyanide from Abidjan port, to:

- Randgold, Tongon gold mine, Ivory Coast
- Randgold/AngloGold Ashanti, Morila gold mine, Mali
- Perseus Mining, Sissingué gold mine, Ivory Coast.

### 2.3 Transit Storage

Within the scope of this audit, there is an interim storage facility at Lynx operations in Abidjan. Cyanide is temporarily stored within the sealed shipping containers. At no time are containers opened or is cyanide removed from the containers.

The trans-shipping storage sites associated with port operations where containers of cyanide are removed from vessels, temporarily stored and then placed on road vehicles for the next part of the journey are not covered under this Supply Chain. These transit storages or trans-shipping depots are managed by the relevant port authorities.

Lynx Logistics Ivory Coast Supply Chain

Name of Facility



Signature of Lead Auditor

18 June 2018

Date

## 2.4 Auditors Findings and Attestation


in full compliance with

Lynx Logistics is:  in substantial compliance with **The International Cyanide Management Code**  
 not in compliance with

No significant cyanide exposures or releases were noted to have occurred during Lynx Logistics' Supply Chain recertification audit.

**Audit Company:** Golder Associates Pty Ltd  
**Audit Team Leader:** Mike Woods, Exemplar Global (110895)  
**Email:** [mwoods@golder.com.au](mailto:mwoods@golder.com.au)

## 2.5 Name and Signatures of Other Auditors:

Name	Position	Signature	Date
Mike Woods	Lead Auditor and Transport Technical Specialist		18 June 2018

## 2.6 Dates of Audit

The Certification Transport Audit of Lynx was undertaken over two days 31 October and 1 November 2017.

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 *Cyanide Transportation Verification Protocol for the International Cyanide Management Code* and using standard and accepted practices for health, safety and environmental audits.

Lynx Logistics Ivory Coast Supply Chain  
 Name of Facility

  
 Signature of Lead Auditor

18 June 2018  
 Date

## 3.0 CONSIGNOR SUMMARY

### 3.1 Principle 1 – Transport

Transport Cyanide in a manner that minimises the potential for accidents and releases.

#### 3.1.1 Transport Practice 1.1

Select cyanide transport routes to minimise the potential for accidents and releases.

in full compliance with

Lynx Logistics is  in substantial compliance with **Transport Practice 1.1**

not in compliance with

#### Summarise the basis for this Finding/Deficiencies Identified:

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

The transporter has implemented a process or procedure for selecting transport routes that minimise the potential for accidents and releases or the potential impacts of accidents and releases. The procedure considers the following during the assessment process:

- Potential for vehicle on vehicle accidents
- High pedestrian activity areas
- Impact of possible road blockages and diversions
- Pitch and grade of roads (in particular with regards to rail crossings, etc.)
- Quality and general condition of roads
- Location of waterways along the route
- Possibility of fog that may inhibit visibility.

Route assessment documents were noted as being detailed. The documents are structured in a tabular format that denote the distances along the routes, specific hazards or issues, a corresponding picture and control measures to manage the hazard or issue.

The routes in operation during the audit were:

- Port of Abidjan to Rangold's Tongon Mine
- Port of Abidjan to Perseus Sissingué Mine.

Route assessments were documented for both of these routes.

The transporter does implement a procedure to evaluate the risks of selected cyanide transport routes and take the measures necessary to manage these risks. There is a procedure to evaluate the risks of a transport route that involves an assessment of the road conditions and a risk assessment of the potential hazards identified along the route. Controls are documented together with the identified hazard.

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The transporter has implemented a process or procedure to periodically re-evaluate routes used for cyanide deliveries and obtain feedback on route conditions from operators. The route assessment procedure includes processes to periodically re-evaluate routes used for cyanide deliveries and a process of debriefing following a completion of a convoy that includes obtaining feedback on the route.

The transporter does document the measures taken to address risks identified with the selected routes. The control measures are documented in the risk assessment document and in the convoy management plan.

The transporter does seek input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures. Input is obtained through liaison with government agencies as part of the initial route selection process and the Ivory Coast Environmental Protection Agency can impose conditions via the permitting process. Input from the mine customer in the selection of routes is also obtained. Direct consultation with communities is not undertaken but the location, number and density of communities are part of the considerations outlined in the procedure.

The transporter does use convoys, escorts or other additional safety and security measures where required. Convoys of up to 5 trucks and escorts are required as standard for all cyanide convoys. Convoys are conducted during daylight hours and scheduled stops are identified along the route.

The transporter has advised external responders, medical facilities and communities of their roles and or mutual aid requirements during an emergency.

Potential medical facilities have been identified along routes and part of the route assessment procedure is to evaluate the capabilities these medical facilities. Consultation has been undertaken with mining customers and with the Sante de l'Hospital de Korhogo regarding assistance in the event of an emergency.

The transporter does not subcontract the handling or transport of cyanide.

### 3.1.2 Transport Practice 1.2

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

in full compliance with

Lynx Logistics is

in substantial compliance with

**Transport Practice 1.2**

not in compliance with

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

Lynx is in FULL COMPLIANCE with Transport Practice 1.2 requiring personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

The transporter only uses licensed drivers to operate their vehicles and the drivers have the required licence and class of licence necessary to drive the semi-trailer vehicles used to transport cyanide.

The transporter has provided the drivers with training in the transport of dangerous goods and also provide pre-departure briefings which covers breaks, fatigue management, convoy procedures and alcohol testing.

All personnel operating cyanide transport equipment have been trained to perform their jobs in a manner that minimises the potential for cyanide releases and exposures. The Lynx training program includes driver training, fatigue and pre-departure inspections. In addition, pre-departure briefings are held to inform drivers of the hazards and controls for each of the convoys.

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### 3.1.3 Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

in full compliance with

Lynx Logistics is  in substantial compliance with **Transport Practice 1.3**

not in compliance with

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

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

The transporter only uses equipment designed and maintained to operate within the loads it will be handling when transporting cyanide. The fleet consists of Renault prime movers and trailers. The equipment is sufficient for the single cyanide container that is transported by each truck.

There is a preventative maintenance plan that includes inspections by the drivers prior to each departure and periodic inspections by mechanics based on the vehicle manufacturers' service frequency.

Maintenance records, interviews with personnel and an inspection of vehicles confirmed maintenance systems have been established and are being implemented.

There are procedures to verify the adequacy of the equipment for the load it must bear. Checks are completed as part of the scheduled servicing, daily checks and regulatory inspections. The scheduled servicing includes checks on equipment to identify signs of stress or overloading.

### 3.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

in full compliance with

Lynx Logistics is  in substantial compliance with **Transport Practice 1.4**

not in compliance with

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

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

The transporter implements a safety programme for cyanide transportation that includes pre-start checklists on the prime mover and trailer. These include checks of vehicle roadworthiness, dangerous goods requirements, PPE, and communication equipment. Completed checklists indicate these have been completed in accordance with procedures.

Vehicles, trailers and forklifts involved in the transportation of cyanide are subject to a tiered, routine servicing regime.

Drivers are restricted to daylight driving hours and breaks as outlined in the customer specific transport plan.

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Cyanide is transported only in solid form, stowed into the containers at the production facility. Containers are secured using twist locks to the trailers, which are an integral part of the frame of trailer. Twist locks are checked by the driver prior to departure from the loading area.

If a delivery needs to be modified or suspended a convoy escort will contact the office and detail the situation, the Operations Manager is responsible for assessing the situation and directing the actions of the convoy. If temporary changes occur during a convoy (e.g. due to road works or road closures) the same process is followed.

As part of pre-departure briefings the drivers are tested for alcohol.

Records for deliveries, inspections, vehicle maintenance are kept.

### 3.1.5 Transport Practice 1.5

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

**Lynx Logistics is**  in full compliance with **Transport Practice 1.5**  
 in substantial compliance with  
 not in compliance with

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

Transport Practice 1.5 requiring the operation follow international standards for transportation of cyanide by sea and air is NOT APPLICABLE to Lynx. Lynx does not transport consignments of cyanide by sea or air within the scope of this audit.

### 3.1.6 Transport Practice 1.6

**Track cyanide shipments to prevent losses during transport.**

**Lynx Logistics is**  in full compliance with **Transport Practice 1.6**  
 in substantial compliance with  
 not in compliance with

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

Lynx is in FULL COMPLIANCE with Transport Practice 1.6 requiring the operation track cyanide shipments to prevent losses during transport.

Transport vehicles have the means to communicate with the transport company, the mining operation, the cyanide producer or distributor and/or emergency responders. Vehicles utilise radio transmitters (high frequency two-way radios) for communication with other drivers and mobile phones for communication with the operations. Communication with producers and the mine is undertaken by the operations manager.

The communication equipment, mobile phone and radio, is periodically tested to ensure it functions properly. Communications equipment including GPS and phone is checked as part of the pre-departure checks.

Communication blackout areas along the transport route have been identified. The operation has implemented a call in schedule prior to entry and upon exiting the blackspot area.

There are systems and procedures to track the progress of cyanide shipments. The operation has delivery documentation and scheduled call in procedures to track the progress and completion of shipments, as well as a GPS system to track the vehicles.

The transporter does implement inventory controls and/or chain of custody documentation to prevent loss of cyanide during shipment. All shipping containers are locked by the producer with seals and the seal numbers recorded and checked by the consignee. Seals are also checked at transfer locations and on route. The container numbers and seals are checked off by the mine site upon arrival.

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

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## 3.2 Principle 2 – Interim Storage

**Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures.**

### 3.2.1 Transport Practice 2.1

**Store cyanide in a manner that minimises the potential for accidental releases.**

in full compliance with

**Lynx Logistics is**

in substantial compliance with

**Transport Practice 2.1**

not in compliance with

#### **Summarise the basis for this Finding/Deficiencies Identified:**

Lynx is in FULL COMPLIANCE with Transport Practice 2.1 requiring the storage of cyanide in a manner that minimises the potential for accidental releases.

In-transit storage occurs occasionally. There is a dedicated depot that is used for ad hoc storage of full cyanide shipping containers and returned empty isotainers.

There are warning signs posted at the entry to the site alerting works that cyanide is present, that smoking, open flames, eating and drinking are not allowed and what PPE must be worn.

The containers are removed from the truck and placed on the ground, bunting and movable signage are placed around the containers. The depot has a secure fence around the perimeter and manned gate to control access.

There are security measures in place to prevent unauthorised access to cyanide, such as lockouts on valves and fenced storage of solids. The containers have locks and metal cable seals installed to prevent access. At no time are the seals or locks removed prior to the point of discharge at the mine site.

Container inspections occur at the time of collection at the port and this check includes a visual inspection of locks and seals.

Cyanide is separated from incompatible materials such as acids, strong oxidisers and explosives to prevent mixing. No acids or strong oxidisers are stored in proximity of the cyanide. The sodium cyanide is in solid form within the locked and sealed container further preventing the potential for mixing with incompatible materials.

Cyanide is stored in a manner designed to minimise the potential for contact of solid cyanide with water. The containers are stored on an area of the site that minimises the potential for ponding of stormwater around the containers. Cyanide is only stored within the shipping containers with locks and seals which minimise potential for contact of solid cyanide with water.

Cyanide is stored with adequate ventilation to prevent the build-up of hydrogen cyanide gas. The solid cyanide is a pH buffered product at the point of manufacture and the product is placed within the shipping containers with locks and seals which minimise potential for contact of solid cyanide with water or other incompatible material there by preventing the build-up of HCN gas. The containers are also stored in a naturally ventilated area.

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Systems are in place with the capacity to contain any spilled cyanide materials and minimise the extent of a release. An emergency response plan includes the response to potential loss of containment from storage at the depot.

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### 3.3 Principle 3 – Emergency Response

Protect communities and the environment through the development of emergency response strategies and capabilities.

#### 3.3.1 Transport Practice 3.1

Prepare detailed Emergency Response Plans for potential cyanide releases.

in full compliance with

Lynx Logistics is

in substantial compliance with

Transport Practice 3.1

not in compliance with

#### Summarise the basis for this Finding/Deficiencies Identified:

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

The transporter has an Emergency Response Plan (ERP) that details the objectives, incident management strategy and responsibilities in the event of an emergency. The plan outlines the interactions between Lynx, its customers and key government agencies that may become involved in responding to an incident during cyanide transport.

The ERP is appropriate for the selected transportation route and interim storage facility. The ERP focuses on incidents during transport, but the details of responding to foreseeable incident scenarios are applicable to the current storage facility. The ERP provides actions to secure the scene, evaluate the incident and the equipment needed to respond for various applicable scenarios.

The ERP considers both the physical and chemical form of cyanide. Only solid cyanide in the form of briquettes is transported and stored in intermediate bulk containers within sealed sea containers. The ERP considers the solid form of cyanide and response procedures in the event of fire or spillage. It also outlines additional steps if spilt material becomes wet. The ERP contains information on the physical and chemical form of cyanide via the Safety Data Sheet (SDS).

The ERP considers the method of transport, the storage conditions and all aspects of the transport infrastructure. The route assessment process informs the ERP. The route risk assessments consider road condition, communication around blackspot areas and road hazards.

The ERP considers the design of the transport vehicle and storage facility. The plan is based around road transportation and the configuration of the transport vehicles. The plan is based around solid cyanide transport in shipping containers with the container secured to a drop deck trailer. Cyanide is stored in a designated area of the depot away from other activities with an exclusion zone established.

The ERP includes descriptions of response actions, as appropriate for the anticipated emergency situation for transportation and storage. The ERP includes a role, responsibility and contact list table that provides a summary of the actions for the drivers, escorts, management and the customer. In addition to the military and government personnel, Lynx engages Nawa Logistics to accompany the convoy. Nawa Logistics are a specialist provider with experienced personnel in safety and emergency response. Nawa Logistics personnel would implement Lynx's emergency response procedures at the scene under the management of Lynx.

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The plans identify the roles of outside responders, medical facilities or communities in emergency response procedures. Depending on the nature of the incident there may be involvement from the fire service, police, military and CIAPOL (Centre for Ivorien Antipollution).

### 3.3.2 Transport Practice 3.2

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

in full compliance with

**Lynx Logistics is**

in substantial compliance with

**Transport Practice 3.2**

not in compliance with

#### **Summarise the basis for this Finding/Deficiencies Identified:**

Lynx is in FULL COMPLIANCE with Transport Practice 3.2 requiring they designate appropriate response personnel and commit necessary resources for emergency response.

The transporter provides emergency response training for appropriate personnel.

Lynx provides training on the response processes detailed in the ERP and uses mock emergency drills as part of the training process. Lynx conducted a mock drill on response to minor spills that was attended by drivers, escorts and CIAPOL.

The plans include descriptions of the specific emergency response duties and responsibilities of personnel. The ERP provides a description of the specific responsibilities for personnel in the event of an emergency, including managers, drivers and escorts.

There is a list of emergency response equipment that should be available during transport or along the transport route. The transporter has the necessary emergency response and health and safety equipment, including PPE, available during transport.

The transporter has provided training in emergency response procedures through Transport of Hazardous Goods (Cyanide) and mock emergency drills. The ERP contains commitments to annual mock drills and response to emergencies is also covered in pre-departure briefings.

Initial training on the ERP is provided as part of the induction process, refresher training is provided whenever a new revision of the ERP is developed. Mock drills include an assessment of the implementation of the ERP and identify lessons learnt.

The transporter has formal procedures in place to inspect emergency response equipment and assure its availability when required. Checklists are completed prior to departure and the Transport Manager is responsible for maintaining emergency response equipment.

Whilst Lynx does not subcontract the transport of cyanide it has a specialist subcontractor to implement some components of its emergency response plan at the scene. The ERP does clearly delineate the roles and responsibilities as this contractor performs the role of escort as detailed in the plan.

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### 3.3.3 Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

in full compliance with

Lynx Logistics is

in substantial compliance with

Transport Practice 3.3

not in compliance with

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

Lynx is in FULL COMPLIANCE with Transport Practice 3.3 requiring that they develop procedures for internal and external emergency notification and reporting.

There are procedures and current contact information for notifying the shipper, the receiver/consignee, regulatory agencies, outside response providers, medical facilities and potentially affected communities of an emergency.

The ERP has an emergency contact list and the list includes contact details for the police, hospitals, fire service, customers and military.

There are systems in place to ensure that internal and external emergency notification and reporting procedures are kept current. The ERP details the currency of Emergency Contact Numbers and includes provision for checking annually and when updates to the plan are made.

### 3.3.4 Transport Practice 3.4

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

in full compliance with

Lynx Logistics is

in substantial compliance with

Transport Practice 3.4

not in compliance with

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

Lynx is in FULL COMPLIANCE with Transport Practice 3.4 requiring that they develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

There are procedures for remediation, such as recovery or neutralisation of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris.

The ERP provides the guidance on recovery and neutralisation should the loss of product occur. Lynx would undertake spill recovery but in the event of a major incident the Government may take control of the scene and Lynx would provide support as requested. Lynx engages a specialist contractor Nawa Logistics to undertake the recovery in the event of a spill under Lynx procedures and management.

The ERP covers the decontamination process for a spill of solid or liquid cyanide into soil and the use of Sodium Hypochlorite for decontamination purposes. The plan provides guidance on the steps to take as well as the hazards involved.

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The ERP prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water.

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### 3.3.5 Transport Practice 3.5

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

in full compliance with

Lynx Logistics is

in substantial compliance with

**Transport Practice 3.5**

not in compliance with

#### Summarise the basis for this Finding/Deficiencies Identified:

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

There are provisions for periodically reviewing and evaluating each plan's adequacy and they are being implemented. The ERP is reviewed annually and following mock drills or emergencies where findings indicate changes are needed.

The ERP was developed in July 2017 and is not yet due for its first annual review.

There are provisions for periodically conducting mock emergency drills and they are being implemented. The ERP states that mock exercises will be conducted annually. A recent mock exercise was conducted and included drivers, management personnel and representatives from CIAPOL.

A debrief report was generated following the exercise that included an assessment of performance and possible improvements.

### 4.0 IMPORTANT INFORMATION

Your attention is drawn to the document titled – "Important Information Relating to this Report", which is included in Appendix A of this report. The statements presented in that document are intended to inform a reader of the report about its proper use. There are important limitations as to who can use the report and how it can be used. It is important that a reader of the report understands and has realistic expectations about those matters. The Important Information document does not alter the obligations Golder Associates has under the contract between it and its client.

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## Signature Page

**GOLDER ASSOCIATES PTY LTD**



Mike Woods  
*ICMC Lead Auditor and ICMC Transportation Expert*

MCW/EWC/hn

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**APPENDIX A**

**Important Information**

The document ("Report") to which this page is attached and which this page forms a part of, has been issued by Golder Associates Pty Ltd ("Golder") subject to the important limitations and other qualifications set out below.

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